

COUNTERING IRAN IN THE ARABIAN GULF

BY ROBERT CLARK AND LUKE RAWLINGS



**GLOBAL
BRITAIN
PROGRAMME**

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About The Henry Jackson Society

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About the Global Britain Programme

The **Global Britain Programme** is a research programme within The Henry Jackson Society that aims to educate the public on the need for an open, confident and expansive British geostrategic policy in the twenty-first century, drawing off the United Kingdom's unique strengths not only as an advocate for liberalism and national democracy, but also a custodian of both the European and international orders.

Executive Summary

Since 2019, the Islamic Republic of Iran has been openly defiant of the nuclear deal it joined in 2016, the Joint Comprehensive Plan of Action (JCPOA). The Iranian Government insists that its noncompliance was a direct consequence of the US withdrawal from the JCPOA, and the subsequent sanctions imposed. However, this report will demonstrate how the deterioration of the JCPOA and its supporting components – such as UNSC Resolution 2231 – is rooted in the inability of the deal to address broader security issues pertaining to the Middle East.

Sanctions relief incumbent within the JCPOA has enabled an enriched Iranian regime to increase its sponsorship of regional terrorist organisations. Such an influx of funds without adequate measures in place jeopardises the UK’s national security interests, as well as those of some of our allies in the region: Saudi Arabia and Israel. With its comparably easy access to currency since the implementation of the JCPOA, the Islamic Revolutionary Guards Corps (IRGC) has caused the deaths of UK and US personnel and inflicted traumatic injuries on hundreds of others through its sponsorship of violence. Furthermore, Iran has continually ignored arms embargos, arming proxy groups in the region with weapons that are later used against military personnel, civilians or Coalition interests in the Middle Eastern region.

This report demonstrates that, while the JCPOA was an effective instrument for constraining Iranian nuclear proliferation, it failed to constrain broader security issues which are intertwined with the nuclear capacity of Iran. The US’s reimposition of sanctions in 2018 significantly constrained the Iranian economy, and consequently Tehran’s medium-term ability to fund regional terrorist organisations. This report finds that hard-hitting economic sanctions which successfully target the Iranian oil industry are effective temporary tools for delivering regional security. In order to further improve the efficacy of such sanctions, more attention should be paid to the banking infrastructure in both Lebanon and Iraq. These entities channel the transfer of Iranian money to regional terrorist proxy organisations. Accordingly, any future sanctions should target these regional banks.

Furthermore, the International Maritime Security Construct (IMSC) – while a welcome addition to the regional security architecture across the Arabian Gulf – should be augmented. The Royal Navy, which following the Integrated Review is to see an increase in size and scope, must have a more active and engaging role within the Gulf. This should include: deterring Iranian attacks on international shipping; preventing illegal ship seizures; combatting the threat from Iran’s Unmanned Aerial Vehicles (UAV); and countering drone technology.

It is imperative that the UK and its allies act quickly to deal with Iran. Stability in the region cannot be achieved through nuclear proliferation alone, so the P5+1 and their regional allies must look to establish a more comprehensive nuclear and regional deal which can sufficiently safeguard Coalition interests, as well as the interests of the local population.

Glossary of terms and abbreviations

IAEA – International Atomic Energy Agency. Comprising 173 state members, the IAEA is an independent nuclear energy watchdog that reports directly to the United Nations General Assembly and Security Council.

IRGC – Islamic Revolutionary Guards Corps. A branch of the Iranian Armed Forces founded after the Iranian Revolution by Ayatollah Khomeini. According to the Iranian constitution, the IRGC protects Iran’s Islamic republic political system. The IRGC’s foreign operations wing, the Quds Force, maintains a leadership cadre and fighters actively engaged across many of the Middle East’s ongoing conflicts, including those in Syria, Iraq, Yemen and Lebanon. Comprising approximately 250,000 personnel, the IRGC’s naval forces are tasked with operational control of the Persian Gulf. The IRGC is listed as a terrorist organisation by the United States, Bahrain and Saudi Arabia.

IMSC – International Maritime Security Construct. An informal maritime alliance comprising Albania, Bahrain, Estonia, Lithuania, Saudi Arabia, the United Arab Emirates, the United Kingdom and the United States. Headquartered in Bahrain, the organisation was established in 2019 after multiple oil tankers and merchant ships were attacked by Iran. The IMSC’s aim is to deter maritime harassment and illegal seizure of merchant vessels in the region’s waters. The security construct is officially tasked with maintaining order and the security of global oil supply routes in the Persian Gulf, Gulf of Oman, Gulf of Aden and Southern Red Sea. Task Force Sentinel is the IMSC’s operational wing.

JCPOA – Joint Comprehensive Plan of Action. Agreed in 2015 by Iran, the United States, the United Kingdom, France, Germany, Russia, China and the European Union, it aimed to curtail Iran’s nuclear programme in return for sanctions relief. It came into force on 16 January 2016 and was reinforced by United Nations Security Council (UNSC) Resolution 2231.

MTCR – Missile Technology Control Regime. A multilateral export control regime that seeks to limit the proliferation of missiles and missile technology. Founded by the G7 states, the now 35-member organisation seeks to limit the proliferation of weapons of mass destruction by controlling exports of goods and technologies that could contribute to delivery systems. The MTCR places particular restrictions on rockets and unmanned aerial vehicles capable of delivering a payload of at least 500 kg to a range of at least 300 km, as well as on equipment, software and technology for such systems.

**Foreword by the Rt Hon. Tobias Ellwood MP,
Chair of the Defence Select Committee**

‘Countering Iran in the Arabian Gulf’ is an important read for those interested in Iran’s growing influence in the Arabian Gulf.

I have thoroughly enjoyed both my discussions with Robert and reading this report, given the issues he highlights but more importantly given his policy recommendations for the UK Government. Since becoming an MP, and especially more recently in my role as Chairman of Parliament’s Defence Select Committee, I have been a vocal advocate for Global Britain, and have stressed that to maintain our international influence we must ensure we maintain a strong defence posture. This couldn’t be more important than in the Middle East, where unstable and fractured states are vulnerable to radicalised extremist and authoritarian influences that are determined to challenge the fragile international order.

Robert’s recommendations echo many of my own thoughts, especially regarding our engagement in the region. The Government’s recent publication of the ‘Integrated Review’ has reinforced just how crucial a robust defence posture is, not only for our country’s global influence but to protect current international standards and values.

The decision to reduce the size of our naval surface fleet before replacement ships are built risks destabilising the International Maritime Security Construct if it is not replaced with another permanent deployment. Robert’s recommendation to fully operationalise the ‘permanent deployment’ of a type 23 Frigate to Operation Kipion, based in Bahrain, is definitely something the Government should consider.

More broadly speaking, this report spotlights Iran’s proxy influence in the region and the wider strategic wins in securing a potential nuclear deal. As this report illustrates, including Saudi Arabia and the UAE (both strategic allies of the UK) in some aspects of the nuclear negotiations could help reduce long-term tensions, which would not just be mutually beneficial but would allow the entire region to prosper.

Robert’s findings and recommendations are highly thought-provoking and I hope will stimulate the Government into considering how we might be more pro-active, in the spirit of Global Britain, to help shape the political weather in these critical months ahead.

PART ONE: THE GEOPOLITICAL ENVIRONMENT

Introduction

The Iranian Government represents a direct threat to both the economic and the military interests of the United Kingdom (UK) in the Arabian Peninsula. This report offers a review of the threats posed by Iran to the UK's national interests, arguing that Iran directly threatens the UK's security through its continued nuclear proliferation, criminal seizures of civilian merchant vessels, and the unlawful detentions of UK and dual UK-Iranian citizens.

According to the US Department of State, Iran continues to be “the world's worst state sponsor of terrorism”, spending approximately US\$1 billion annually on supporting, arming, and financing regional terrorist organisations.¹ Iran utilises organisations such as the Houthis and Hezbollah as proxies in regional conflicts, some of which directly threaten UK security. By way of example, in February 2021, Kata'ib Hezbollah rocketed the Al-Asad Airbase in Iraq which houses² the US-led Coalition, including UK personnel, who are fighting the Islamic State.³ The attack by Iranian proxy Kata'ib Hezbollah contributed to the death of a US civilian contractor who suffered a heart attack as a result of the bombing. Given the close proximity of UK and US personnel and the limitations of rocket targeting, it is an unavoidable reality that such an attack could have resulted in the deaths of British nationals. The February attack came immediately after a similar attack on Coalition forces at Erbil International Airport in January 2021, which killed a Filipino contractor and inflicted injuries on a US serviceman. This attack was claimed by Iraq Shia militia group Saraya Awliya al-Dam, which Iraqi officials believe is linked to Tehran.⁴

Furthermore, Iran continues to engage in state-based piracy towards international merchant shipping across the region, particularly in the vulnerable Strait of Hormuz. The Iranian regime – despite struggling to deal with its own domestic issues, including ongoing pandemic relief and worsening civil unrest – has demonstrated no reduction in the threat it poses towards international shipping through the Navy of the IRGC. In January 2021, the IRGC illegally seized the South Korean oil tanker *MT Hankuk Chemi* and its crew.⁵ Notwithstanding the implementation of the IMSC, Iranian piracy remains a clear threat to both British and international economic interests in the region, as demonstrated by the illegal seizure of the British-flagged *Stena Impero* by the IRGC in July 2019.

Given the Iranian Government's increasingly aggressive behaviour, the UK Government's Integrated Review (IR) provided an excellent opportunity to evaluate the threats posed by Iran. The IR also coincided with the return of a Democratic administration in the US. Continued Iranian breaches of the now largely symbolic JCPOA have been one of President Biden's first real foreign policy tests.

¹ “Country Reports on Terrorism 2018”, Bureau of Counterterrorism, U.S. Department of State, <https://www.state.gov/reports/country-reports-on-terrorism-2018/>.

² “Iraq rocket attack: Air base hosting US-led coalition forces targeted”, *BBC News*, 3 March 2021, <https://www.bbc.co.uk/news/56249926>.

³ Rosie Laydon and Tom Sables, “Iran Air Strikes: Military bases containing British personnel attacked”, *Forces.net*, 8 January 2020, <https://www.forces.net/news/iran-air-strikes-us-military-bases-containing-british-personnel-attacked>.

⁴ John Davison and Ahmed Rasheed, “U.S. Forces in Iraq Hit by Rockets, Contractor Killed”, *U.S. News*, 15 February 2021, <https://www.usnews.com/news/world/articles/2021-02-15/mortars-land-near-erbil-airport-iraqi-kurdish-security-sources-say>.

⁵ Dominic Dudley, “South Korea Agrees to Unfreeze \$1 Billion In Iranian Assets, Following Tanker Seizure by Tehran”, *Forbes*, 24 February 2020, <https://www.forbes.com/sites/dominicdudley/2021/02/24/south-korea-agrees-to-unfreeze-1-billion-in-iranian-assets-following-tanker-seizure-by-tehran/?sh=54d6c9101386>.

With the cessation of snap inspections announced in February 2021 and the announcement of uranium enrichment of up to 20% in January 2021,⁶ President Biden's administration is attempting to bring Iran back to the negotiation table. This is a critical time, following the election as Iranian president on 18 June 2021 of Ebrahim Raisi, a former judge. Raisi is widely regarded⁷ as a conservative hard-line figure, who will make ongoing negotiations surrounding the JCPOA revival even tougher for the US.

Should the predictions about Raisi prove accurate, it will render an already deteriorating situation more complex and fragile, drawing the UK into a mediating role between the US, European partners who remain signatories to the JCPOA, and Iran. More than one of the existing signatories agree that the JCPOA needs to either be updated or replaced entirely with a broader mandate.⁸ Such a model would likely include not only prohibitions on Iran's nuclear proliferation but would also address regional insecurity concerns emanating from the Islamic Republic, such as Iran's Inter-Continental Ballistic Missile (ICBM) programme.

The UK should seek the advice of key regional partners excluded by the original deal, namely Israel, Saudi Arabia, and the United Arab Emirates (UAE), who have suffered continued Iranian aggression and hostility. The UK Government's recent foreign policy and security review has certainly left enough political and diplomatic capital for this option and a more flexible approach to the current JCPOA arrangements. This would help to address the security challenge presented by Iran across the Arabian Peninsula.

This report begins with a geopolitical overview of the UK's national interests in the region, as defined by the recent IR and other UK Government policy documents. Following this, the report answers two research questions: what is the nature of the Iranian security threat to the UK national interest, and how can the UK Government respond appropriately to this threat? To accurately determine the nature of the Iranian security threats, all recorded and verified instances of Iranian aggression against the UK's national security interests are compiled into an anthology. The data for this anthology was collected from open-source intelligence and online media archives, with verification for official Iranian breaches of the JCPOA being provided by the IAEA, and other UN bodies. The timeframe for this anthology is from August 2013, when President Hassan Rouhani took office, to May 2021. In 2013, at the time of Rouhani's election, some commentators viewed him as a positive change for the regional security environment, compared to the previous hard-line government of Mahmoud Ahmadinejad.⁹ However, once international sanctions were lifted in 2016, the Iranian Government and the IRGC increased their attacks on British interests and those of Britain's allies, including the US, Saudi Arabia, and Israel. Subsequently, all recorded and verified instances of the following are detailed in sequential chapter order:

1. Iranian breaches of the JCPOA.
2. Iran's ICBM Programme.
3. Verified aerial attacks from the Houthis against targets in Saudi Arabia using Iranian-supplied cruise and ballistic missiles, and Iranian UAV drone technology.
4. Verified attacks conducted by the IRGC-controlled Shia militias against Coalition forces in Iraq.

⁶ "Iran resumes enriching uranium to 20% purity at Fordo facility," *BBC News*, 4 January 2021, <https://www.bbc.co.uk/news/world-middle-east-55530366>.

⁷ Dominic Dudley, "Iran's Next President is Almost Certain To Be A Hardliner, Making Biden's Outreach To Tehran Tougher", *Forbes*, 24 February 2021, <https://www.forbes.com/sites/dominicdudley/2021/02/24/irans-next-president-is-almost-certain-to-be-a-hardliner-making-bidens-outreach-to-tehran-harder/?sh=3f24509b5b45>.

⁸ "French President Emmanuel Macron for broader Iran deal", *DW*, 9 May 2018, <https://www.dw.com/en/french-president-emmanuel-macron-for-broader-iran-deal/a-43716203>.

⁹ Saeed Kamali Dehghan, "Hassan Rouhani sworn in as president of Iran, urging moderation and respect", *The Guardian*, 4 August 2013, <https://www.theguardian.com/world/2013/aug/04/hassan-rouhani-sworn-in-president-iran>.

Furthermore, this report details Iranian attacks against international shipping across the Arabian Peninsula, and all illegal IRGC ship seizures. Finally, this report lists British and dual-British nationals who have been held in unlawful detention in Iran on spurious charges since 2013. This completes a comprehensive undertaking of all recorded instances of Iranian state-based activity against UK national interests since 2013, when negotiations over an Iranian nuclear deal first began.

At the time of writing, the US is currently engaged in ongoing negotiations, through EU intermediaries, with representatives of the Iranian regime in Vienna. Officials in Washington are attempting to bring Iran back to nuclear compliance within the original terms of the JCPOA. However, as argued in this report, the original terms of the JCPOA are unfit for purpose. In particular, the deal does little to address Iran's regional terrorist activity, as sanctions relief emboldened and enriched the IRGC to conduct attacks against the UK's regional security interests and those of its allies. Just as troublingly, the original terms of the JCPOA revealed very little strategic understanding of the threats posed by the Iranian regime to regional security. Nor did it properly address the question of how liberal democracies like the UK and US should respond to these threats and challenges.

Finally, this report highlights key security concerns which the UK Government should address, as well as a list of specific policy recommendations for doing so.

Chapter 1: The UK's National Interest in the Arabian Peninsula

1.1 *The Integrated Review: A geopolitical context*

In March 2021, the UK Government released its Integrated Review (IR) of Security, Defence, Development and Foreign Policy, entitled 'Global Britain in a competitive age'. Realigning diplomatic and security priorities for the coming decade, this text established the foundations for the UK's engagement with the Middle East. The defining feature of the IR was the Government's renewed assessment of the changing character of the global environment with which the UK must interact. In the IR, the Government identified that the central threats to the UK's national security are those derived from state-based entities, primarily from Russia, China, Iran, and North Korea:

Opportunistic states will increasingly seek strategic advantage through exploiting and undermining democratic systems and open economies. Russia will be more active around the wider European neighbourhood, and Iran and North Korea will continue to destabilise their regions.¹⁰

Since the end of the Cold War, the UK Government had perceived the main threats to the UK's national security as originating from so-called "zones of chaos".¹¹ These are failing or failed states which lead to power vacuums, internal conflict, and a high propensity to trigger or enable terrorism and radicalisation.¹² However, the primary threats to security are now emerging from the recent return to great power rivalry, and state-based threats. Here, the Cold War and post-Cold War narrative of 'East versus West' is no longer a valid perspective through which to view this changing security threat narrative.

The geopolitical environment in which the UK now operates – for the coming decade at least – should instead be viewed as a contest between liberal, open democracies and authoritarian, revisionist states. The Middle East teeters on the fringes of both blocs, with authoritarian monarchies and revisionist dictatorships coexisting alongside the fragile and emerging democracies and democratic movements witnessed since the so-called Arab Spring, in addition to established democracies like Israel. The UK maintains active interests across Middle Eastern states incorporating these different forms of governance, particularly in the fields of hydrocarbon energy extraction, green energy innovation, science and technology collaboration, growing markets for UK export, and both regional and international transport and telecommunications hubs.¹³ As well as being the most current document for British foreign and security policy, the IR highlights the strategic direction for 'Global Britain' in the Middle East, and with respect to Iran in particular.

1.2 *The Middle East: Recent UK policy*

At the conclusion of the long-negotiated JCPOA, the 2015 Strategic Defence and Security Review (SDSR) set out the Government's strategic direction for the UK's interests in the Middle East. These primarily concerned counterterrorism and radicalisation, cross-border migration,

¹⁰ "Global Britain in a competitive age: The Integrated Review of Security, Defence, Development and Foreign Policy", UK Government Cabinet Office, March 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/975077/Global_Britain_in_a_Competitive_Age-the_Integrated_Review_of_Security__Defence__Development_and_Foreign_Policy.pdf, p.29.

¹¹ Robert Cooper, *The post-modern state and the world order* (London: Demos, 1996), p.16. See also: "Defence White Paper", 2003, p.5.

¹² *Ibid.*, p.16.

¹³ "Global Britain in a Competitive Age", p.6.

the Syrian civil war, and the threat from the Islamic State of Iraq and Levant (ISIL).¹⁴ It identified the region as vital to European security and prosperity, offering both significant opportunities but also threats to security. It committed to an increase in diplomatic efforts, in particular with the Gulf Cooperation Council (GCC), which the UK Government viewed as among its regional allies. It also envisaged an increased role for the UK Armed Forces in the region, as was most apparent in Bahrain and Oman, where the UK established new naval facilities.¹⁵ Furthermore, the SDSR sought to highlight the growing emphasis on state-based threats, which would be echoed six years later in the 2021 IR:

...wider state competition can be a risk to stability. In the Middle East and North Africa, regional powers have been pursuing competing security interests, driven by growing military and economic capabilities.¹⁶

The SDSR also highlighted the “resurgence of state-based threats; and intensifying wider state competition” in its first annual report, published in December 2016.¹⁷ The geopolitical environment has changed since then, however. The 2015 SDSR and its subsequent first annual report in 2016 began to highlight this change in the geopolitical environment within which the UK will increasingly operate.

The 2015 SDSR and subsequent annual report in 2016 demonstrated how the geopolitical environment was beginning to shift away from the zones of chaos of the previous ten years and towards the growing great power rivalry characterised by state-based threats to UK interests in the Middle East.

Since 2015, British interests in the Middle East have been defined by ‘prosperity’ and ‘security’, but there are three main challenges to them. The first is from terrorism and radicalisation (particularly from ISIL). The second is the geopolitical environment of wider state-based competition between regional powers (with both Israel and Saudi Arabia at one end of the spectrum, and Iran at the other). Third are the threats to the global oil supply on which the UK economy currently still depends.

The 2021 IR builds upon and solidifies the UK’s commitment to its trade and security interests in the Middle East: “The UK has strong, historic bilateral ties in the Middle East and North Africa region – such as with Jordan and Oman – which are vital to UK prosperity and security.”¹⁸ These historical links with countries in the Middle East help further strengthen the UK’s legitimate role as a security actor in the region, with established historical and economic interests to safeguard.

In addition, the IR goes on to state that the UK will develop a deeper involvement in protecting its interests (defined as trade and security). The UK Armed Forces will achieve this by working in closer collaboration with regional allies, thus increasing the capacity of partner nations’ security forces:

...and working with our partners to enhance and modernise their security capacity and capabilities to ensure lasting stability in the region. Our armed forces will continue to

¹⁴ “National Security Strategy and Strategic Defence and Security Review 2015”, UK Government Cabinet Office, November 2015, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/555607/2015_Strategic_Defence_and_Security_Review.pdf.

¹⁵ Ibid., p.55.

¹⁶ Ibid., p.19.

¹⁷ “National Security Strategy and Strategic Defence and Security Review 2015: First Annual Report 2016”, UK Government Cabinet Office, December 2016, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575378/national_security_strategy_strategic_defence_security_review_annual_report_2016.pdf, p.6.

¹⁸ “Global Britain in a Competitive Age”, p.63.

contribute to the Global Coalition against Daesh in Iraq and Syria. We will also build upon our close security partnerships, including with Israel and Saudi Arabia, to better protect our interests in the region.¹⁹

Crucially, the document also emphasises how the maintenance of oil supplies is central to both the global economy and to regional security: “We will work with our international partners to maintain secure global oil supplies, particularly in the Middle East”.²⁰

Therefore, in an attempt to counteract these challenges to UK interests in the Middle East, the IR has shifted future British strategy in the region to one of increased integration with regional partners, with a particular focus on the development of allied capacity building to ensure the expansion of its own security and security relationships with both Israel and Saudi Arabia. Such a strategy will become increasingly pertinent to the UK’s engagement with Iran on regional security interests in the coming decade.

1.3 Iran in the IR: A more comprehensive nuclear and regional deal

Importantly, the IR outlines how Iranian nuclear proliferation remains a central security concern for the UK and its allies. Consequently, it places an emphasis on the UK working with allies and partners to hold Tehran to account over its nuclear proliferation. In addition, it describes how the UK will work with allies to achieve a “more comprehensive nuclear and regional deal”:

As a priority, we will continue to work with partners on a renewed diplomatic effort to prevent Iran from developing a nuclear weapon, to hold it to account for its destabilising activity in the region...²¹

Alongside our allies, the UK will hold Iran to account for its nuclear activity, remaining open to talks on a more comprehensive nuclear and regional deal.²²

This last remark concerning talks for a more comprehensive nuclear and regional deal is exceptionally important for the UK’s Iranian policy, as it signals a steep change to the recent strategy of abiding by the terms of the JCPOA on Iranian nuclear proliferation. The JCPOA does not contain provisions regarding Iranian actions which further destabilise regional security – one of the deal’s central failings. The UK Government now signalling its intent to seek a renewed deal which addresses “nuclear and regional” issues, while holding Iran “to account for its destabilising activity in the region”, reflects the extent to which the UK views Iran as a threat to its national interests.

The IR also addresses the changing geopolitical environment in the Middle East more broadly, and how the UK will seek closer cooperation with regional allies, especially Israel and Saudi Arabia (both of whom were entirely excluded from the negotiations leading up to the signing of the document in 2015), in order to address these challenges.

In the light of the IR’s commitment to working with these two allies on regional security matters, from the UK perspective, any future “nuclear and regional deal” must include close consultation with both Saudi Arabi and Israel. This would strengthen the UK’s position and credibility as a security actor, while also ensuring regional legitimacy to a new deal on Iranian nuclear proliferation and regional instability.

¹⁹ “Global Britain in a Competitive Age”.

²⁰ Ibid., p.92.

²¹ Ibid., p.64.

²² Ibid., p.85.

Chapter 2: Iranian Strategic Interests

2.1 Iranian geostrategy: Core aims and beliefs

Analysts have described Iran's strategic aims as focused on becoming the hegemonic power in the Middle East, and ultimately the dominant global Islamic power.²³ Jack David of the Hudson Institute has aptly described this hegemonic objective of Iran as an attempt to establish "Islamofascist rule in the Middle East".²⁴ In his view, this aim can be directly traced back to the Islamic Revolution of 1979, when modern Iranian strategic thought became steeped in the belief that Iran is the true national centre for a devout Islam. Further historical inspiration is drawn from Iran's imperial past when its rule stretched from China to the Persian Gulf, thus reinforcing conceptions of Iran's rightful place at the centre of the Muslim world.²⁵

In order to achieve this regional hegemony and religious authority, the Iranian leadership employs policies that seek to: undermine US influence across the Middle East; subvert the interests of Saudi Arabia in the Gulf; and destroy the state of Israel.²⁶ As competing centres for regional power, the Iranian Government views Saudi Arabia and Israel as legitimate targets in its quest for achieving regional hegemony. While many of the strategic factors driving Iranian foreign policy complement one another, they inevitably (by their nature) bring Iranian policy makers into conflict with regional partners, in particular Saudi Arabia.

This overarching strategic aim has two operational elements.²⁷ The first operational element is the establishment of a contiguous line of pro-Iranian entities between the Iraq-Iran border, and across to the Mediterranean Sea. This would give Tehran strategic access to the Mediterranean, in addition to a direct entry point into the Arab-Israeli conflict, which would increase its legitimacy among Sunni Arabs who oppose Israel. Furthermore, this policy of maintaining pro-Iranian forces on the Iraq border keeps Baghdad weak and dependent on Iran (particularly when Iran is subjected to US sanctions). In addition, it reduces the risk of another highly destructive war between Iran and Iraq.

The practical realisation of this operational element has led Iran to defend the Assad regime in Syria and maintain significant strategic and political depth in Lebanon. Tehran and Damascus have been military allies since 1982, and should the current Syrian leadership fall to the Sunni rebels, it would spell the end of Iranian influence in the country. Iran also sponsors friendly political players in Iraq, such as the Popular Mobilization Forces (PMF), which include elements and militias proscribed by the US as terrorist entities, including Kata'ib Hezbollah. In Lebanon, the IRGC oversees the political power of Hezbollah, while also supporting Hezbollah's military and terrorist attacks against Israel. Iran's second operational objective is to extend its influence across the Arabic-speaking side of the Arabian Gulf. It sees Saudi Arabia and the Saudi-dominated

²³ Rafael Bardaji, Emily B. Landau, Jonathan Spyer and Tom Wilson, "The Iran Deal a Year On: Assessing Iranian Ambitions", *The Henry Jackson Society*, 2016, <http://henryjacksonsociety.org/wp-content/uploads/2016/07/IRAN-online.pdf>. See also Wyn Bowen and Matthew Moran, "Living with nuclear hedging: the implications of Iran's nuclear strategy", *Chatham House*, https://www.chathamhouse.org/sites/default/files/field/field_document/INTA91_4_01_BowenMoran.pdf. See also Jack David, "Iran's Nuclear Weapon Capability: Containment or Military Action", *Hudson Institute*, 8 June 2010, <https://www.hudson.org/research/7066-iran-s-nuclear-weapon-capability-containment-or-military-action->.

²⁴ Jack David, "We Cannot Reason with Iran", *Hudson Institute*, 5 March 2015, <https://www.hudson.org/research/11119-we-cannot-reason-with-iran>.

²⁵ Bardaji, et al., "The Iran Deal a Year On".

²⁶ "Proposed Bill At Iran's Parliament Calls For Israel's 'Destruction'", *Iran International*, 4 January 2021, <https://iranintl.com/en/iran-in-brief/proposed-bill-irans-parliament-calls-israels-destruction>. See also: Farzin Nadimi, "New Iranian Bill Aims To Officialize a Policy of Avenging Solemani and Destroying Israel", *The Washington Institute for Near East Policy*, 12 January 2021, <https://www.washingtoninstitute.org/policy-analysis/new-iranian-bill-aims-officialize-policy-avenging-soleimani-and-destroying-israel>.

²⁷ Ibid.

GCC as a rival Middle Eastern hegemon and seeks to subvert this influence by developing a ballistic missile programme. Through its ICBM programme, the Iranian Government aims to mitigate a lack of traditional ground and air capability, which Saudi Arabia maintains through extensive contracts with US and UK defence companies. Iran's ballistic missile programme also serves as a deterrent to the expansion of both US and Saudi influences.

This policy of extending Iranian influence across the Arabian Gulf has also led to the rise of proxy warfare across the region, which is yet another way for Iran to compensate for a lack of traditional military strength. The Houthis' attacks against Saudi Arabia and UK and US interests in the Kingdom work towards Iran's goal of weakening Saudi Arabia. Consequently, Tehran is only too willing to support the Houthis, breaking UN arms embargoes, UNSC Resolutions, and the JCPOA. In addition, Iranian harassment of international shipping in the Strait of Hormuz further acts as sabre-rattling at Saudi and US interests, while the build-up of coastal defences and UAVs acts as a deterrent against any overt military response in return.

2.2 Iran's nuclear programme

Iran originally agreed to forgo any development of a nuclear weapons programme as a signatory to the 1970 Nuclear Non-proliferation Treaty. However, after the Islamic Revolution in 1979 and the overthrow of the Shah, the new Iranian leadership secretly pursued nuclear technology. The US concluded in 2007 that Iran had previously halted its nuclear weapons programme in 2003 as a result of the US-led invasion of neighbouring Iraq, but that Tehran had continued to acquire nuclear technology and expertise.

Iran's nuclear programme both complements and reinforces Tehran's strategic aims. Professors Wyn Bowen and Mathew Moran of King's College London have argued that a nuclear weapon would "add symbolic weight to Iran's aspirations of regional hegemony".²⁸ Nuclear weapons are the ultimate symbol of power and military capability, and no Arab Middle Eastern state currently possesses them; Iran views Israel's nuclear weapons as sufficient reason for it to develop them.²⁹ Additionally, a nuclear programme serves as a significant deterrent against US, Saudi and Israeli influence and military action in the region.³⁰

Maintaining an ambiguous nuclear programme enables Iran to sustain a more nuanced deterrent of "nuclear hedging".³¹ The threat of a short breakout period for obtaining a nuclear warhead suits Iran's strategic aims. Iran can employ the threat of upping its nuclear activity in response to sanctions, and other hostile moves from regional actors, while also maintaining the option of gradually backing down, in return for concessions. This policy also avoids the heavier international ostracising, and the almost certain military action that would occur, should Iran's leadership confirm outright that they had a credible nuclear weapon and delivery capability.

As part of this policy of nuclear hedging, Iran can release details of the weapons programme in response to perceived provocations, allowing for the possibility of talks, while also allowing Iranian officials to withdraw last-minute, or to constantly change demands. Such a strategy buys them time to continue developing weapons and enact other subversive policies while making it appear that they are willing to cooperate with Western overtures.³² Lee Smith of the Hudson Institute recalls Ayatollah Khamenei's assertion that he had declared a Fatwah

²⁸ Bowen and Moran, "Living with nuclear hedging".

²⁹ Jack David, J., "Iran's Nuclear Weapon Capability".

³⁰ Ibid.

³¹ Wyn Bowen and Matthew Moran, "Living with nuclear hedging". See also: Andrea Berger and Malcolm Chalmers, "Iran's Nuclear Ambitions: A Steady Crawl to Breakout Capability", *RUSI*, 15 November 2011, <https://rusi.org/explore-our-research/publications/commentary/irans-nuclear-ambitions-a-steady-crawl-to-breakout-capability>.

³² Ibid.

against nuclear weapons in 2005, citing it as evidence of the Iranian leadership's active use of deception.³³

The Iranian Government is evidently more emboldened than ever in using the threat of nuclear weapons to gain concessions from the international community. In the short-term, the hardliners who control the Iranian political landscape are less likely to seek rapprochement with the JCPOA under its current terms, especially while the Biden administration is maintaining Trump-era sanctions. The US withdrawal from the JCPOA under President Trump in May 2018 for continued Iranian noncompliance was viewed by the Iranian Government as confirming its claims that the US cannot be trusted and that France, Germany and the UK (the E3) are too weak to enforce a deal without the US. This has made Tehran more confident in its ability to withstand sanctions after a perceived failure of 'maximum pressure'. Despite US sanctions, the Iranian regime is still in place, and the IRGC still causes significant security threats across the Arabian Peninsula.

³³ Lee Smith, "Iran's Missing Nuclear Fatwa", *Hudson Institute*, 25 April 2012, <https://www.hudson.org/research/8894-iran-s-missing-nuclear-fatwa>.

PART TWO: IRANIAN THREATS TO THE UK'S NATIONAL SECURITY

Iran poses significant threats to British national interests in the Gulf. The IRGC and its external relations wing, the Quds Force, directly and indirectly menace UK trade and security interests, acting in accordance with the strategic vision set for the Islamic Republic by the Supreme Leader Ali Khamenei and the Islamic Consultative Assembly. These threats include: continued nuclear proliferation; increasing ICBM testing – against UNSC Resolution 2231; and the continued financing, arming, and supporting of regional terrorist entities, which directly attack UK or allied personnel.

Chapter Three details continued Iranian nuclear breaches of the JCPOA. Since the withdrawal of the United States from the JCPOA, Iranian nuclear proliferation has increased to dangerous levels, with the regime refusing to remain bound to the rules outlined in the agreement. Consequently, a new agreement which curtails this rapidly evolving nuclear programme, as well as encompassing the broader security issues within the region, is needed with utmost priority to ensure regional stability is restored.

Chapter Four examines Iran's ICBM programme and the agreements made regarding ICBM testing and production under UNSC Resolution 2231. Policymakers have failed to pay enough attention to Tehran's ICBM programme when examining nuclear compliance. After all, the ability to develop weapons-grade uranium is only one aspect of becoming a nuclear power and a reliable delivery capability is a crucial element. Iran's repeated testing and development of ICBMs capable of carrying a nuclear payload further increase its ability to become such a power. The JCPOA is highly ineffective when dealing with Iran's ICBM programme. As such, the US should reappraise these points before fully reinstating the deal.

Chapters Five, Six, and Seven catalogue and analyse the IRGC's sponsoring of regional terrorist organisations, which Iran uses as proxies to realise its strategic aims (regional hegemony, creating a Shia crescent to the Mediterranean, and rolling back US and Western influence). Catalogued in these chapters are the IRGC's ongoing (and, in places, increasing) involvement with the Houthis in Yemen and the Shia militias in Iraq. While US sanctions have considerably reduced elements of the IRGC's ability to fund these organisations, Iran remains highly active in its overt support for, and operational control of, these groups. The JCPOA's ineffectiveness at addressing Iranian sponsorship of regional proxy groups requires urgent attention in the ongoing JCPOA negotiations.

In the aftermath of attacks perpetrated by Iranian proxies on Western forces or their allies, Iranian officials often deny any involvement. The fourteen 107 mm Iranian rockets fired at the Coalition military base in Erbil, northern Iraq, on 15 February 2021 is one such case in point. The attack resulted in two deaths and 13 injuries, including to US service personnel. The attack was claimed by the Iranian proxy militia Saraya Awliya al-Dam.³⁴ In a letter to the UN Secretary General Antonio Guterres in the immediate aftermath of this attack (and others like it), Iran's Ambassador to the UN, Majid Takht-Ravanchi, denied his country's support of "non-governmental militia groups" in Iraq:

The Islamic Republic of Iran has not been directly or indirectly involved in any armed attack against any US individual or body in Iraq... Therefore, we deny any claim about

³⁴ Bethan McKernan and Julian Borger, "Rocket attack on US airbase in Iraq kills civilian contractor", *The Guardian*, 16 February 2021, <https://www.theguardian.com/world/2021/feb/16/rocket-attack-us-airbase-iraq-kills-civilian-contractor>.

our implicit or explicit involvement in attacks against American forces in Iraq. Such allegations are totally baseless, invalid, and false.³⁵

The UK faces separate security challenges beyond the JCPOA and Iran's regional terrorist proxies. Chapter Eight details maritime threats to UK interests across the Gulf, involving illegal ship seizures and attacks on international shipping. The IMSC was established in 2019 in the wake of the illegal seizure of the UK-flagged tanker *Stena Impero* by the IRGC Navy. The IMSC aims to deter and defeat regional threats to its members' maritime security interests in the region, including preventing Iran from seizing ships. Considering the UK's continued reliance on oil imports from the Gulf region, and the fact that Iran illegally seized international shipping at the start of 2021, the Royal Navy's presence in this domain can and should be expanded.

Finally, Chapter Nine examines the British nationals and dual nationals in Iranian detention, often on highly spurious charges. The Foreign, Commonwealth and Development Office (FCDO) advises against all travel to Iran for dual-British nationals, due to the threat of illegal detention. Iran often uses detained foreign nationals as leverage in political disputes with other states. This hostage-taking policy - not new to the Islamic Republic - is a further threat to UK national security. Unfortunately, the UK does not have adequate mechanisms for dealing with these situations. The US maintains a far more effective model for dealing with hostage rescue situations from Iran, as demonstrated in this chapter.

³⁵ Seth J. Frantzman, "Iran denies involvement in Iraq attacks, more attacks hours later", *The Jerusalem Post*, 16 March 2021, <https://www.jpost.com/middle-east/iran-denies-involvement-in-iraq-attacks-more-attacks-hours-later-662126>.

Chapter 3: Nuclear Proliferation

Iran signed the Treaty on the Non-Proliferation of Nuclear Weapons (NPT) in 1968.³⁶ After the revelation in August 2002, by the Paris-based National Council of Resistance of Iran, of the existence of two undeclared nuclear facilities, the Arak heavy water production facility and the Natanz enrichment facility,³⁷ the IAEA reported in June 2003 that Iran had failed to meet its obligations under the NPT safeguards agreement.³⁸ Iran, faced with the prospect of being referred to the UN Security Council, entered into diplomatic negotiations with the E3. Over the next ten years, various discussions between these states resulted in very little, while the UN Security Council moved to adopt a total of six separate resolutions imposing gradual sanctions on Tehran. These included freezing the assets of individuals and companies related to the enrichment programme, and banning the supply of nuclear-related technology to the country.³⁹

It was in 2013, with the election of President Hassan Rouhani, that relations with the US initially improved. In November 2013, Iran and the P5+1 reached an interim agreement, the 'Joint Plan of Action'. This agreement aimed to limit Iran's nuclear programme, and included the cessation of heavy water production at the Arak reactor, and a proposed depletion of much of Iran's stockpile of medium-enriched uranium. In return, certain sanctions were partially lifted, creating the environment needed for more comprehensive talks.⁴⁰ While this document was an important first step to establishing a formal agreement to limit Iranian nuclear proliferation, it contained no parameters for addressing related security concerns, including the Iranian ICBM programme and its sponsoring of regional terrorist organisations. This text subsequently went on to form the basis of the JCPOA and, with it, resulted in the wider security concerns which persist today.

3.1 Summary of key Iranian commitments within the JCPOA⁴¹

Below are the key nuclear commitments of the JCPOA to which Iran must abide in return for the sanctions relief reinstated from 2016. The P5+1 agreed to a lifting of economic sanctions, including Iranian access to more than \$100 billion (USD) in frozen overseas assets, as well as allowing Iranian oil sales on international markets and Iranian access to the global financial system for trade. In return, Iran had to comply with the following:

- A.2. Reduce uranium enrichment capacity to 5060 IR-1 centrifuges for ten years.
- A.3. Only conduct research and development for enrichment that does not accumulate enriched uranium, only using IR-4, IR-5, IR-6 and IR-8 centrifuges. Number of permitted IR-6 and IR-8 centrifuges is capped at 30 for eight-and-a-half years.
- A.5. All enrichment-related activities are to take place at the facility at Natanz. The Fordow facility is not permitted to undertake any enrichment or enrichment research and development.

³⁶ "Iran: Nuclear", *NTI*, June 2020, <https://www.nti.org/learn/countries/iran/nuclear/>.

³⁷ Gary Samore (Ed.), *Iran's Strategic Weapons Programmes: A Net Assessment* (London: The International Institute for Strategic Studies, 2005), p.16.

³⁸ "Implementation of the NPT safeguards agreement in the Islamic Republic of Iran", International Atomic Energy Agency, 6 June 2003, <https://www.iaea.org/sites/default/files/gov2003-40.pdf>.

³⁹ Ian Black, "UN approves new Iran sanctions", *The Guardian*, 9 June 2010, <https://www.theguardian.com/world/2010/jun/09/iran-sanctions-united-nations-nuclear>.

⁴⁰ "Joint Plan of Action", Arms Control Association, https://www.armscontrol.org/files/Iran_P5_1_Nuclear3_Deal_131123.pdf.

⁴¹ "Joint Comprehensive Plan of Action and restrictive measures", European Council/Council of the European Union, <https://www.consilium.europa.eu/en/policies/sanctions/iran/jcpoa-restrictive-measures/>.

- A.7. Keep uranium stockpile under 300 kg up to a maximum 3.67% of enriched uranium for 15 years. Any remaining to be sold or melted down to natural uranium levels.
- B.8. The heavy water research reactor at the Arak facility to be redesigned, rendering it unable to produce weapons-grade uranium.
- B.10. No heavy water reactors or accumulation of heavy water in Iran for 15 years.
- C.15. Allow the IAEA to monitor the implementation of these measures, including: a long-term IAEA presence in Iran; IAEA monitoring of uranium ore concentrate produced by Iran from all uranium ore concentrate plants for 25 years; containment and surveillance of centrifuge rotors and bellows for 20 years; use of IAEA approved and certified modern technologies including on-line enrichment measurement and electronic seals; and a reliable mechanism to ensure speedy resolution of IAEA access for 15 years.
- C.16. Refrain from activities, including research and development, that could contribute to the development of a nuclear explosive device, including uranium or plutonium metallurgy activities.
- Annex 1, C.14. Iran must not allow its stockpile of heavy water to exceed 130 metric tonnes.

*3.2 Timeline – Iranian breaches of the JCPOA*⁴²

Below is a summary of all recorded and verified instances of Iranian breaches of the nuclear agreements under the JCPOA. While the JCPOA was announced on 14 July 2015, it was formally adopted on 18 October 2015, and fully implemented in accordance with Resolution 2231 from 16 January 2016. Documented in Annex A are 33 verified instances of Iranian breaches of the JCPOA. They date from the implementation of the JCPOA up until April 2021. The signatory powers must undertake more work to prevent these nuclear breaches, which continue unabated.

Iran began significantly increasing its nuclear noncompliance after 2019, as evidenced by the data collected and presented in this report. This was especially evident from 2020 onwards, and with continual breaches during 2021 under the new US administration. Here, rather than enforcing the snap-back mechanisms or other meaningful measures to curtail Iran's nuclear proliferation, the Biden administration has sought to enter into the ongoing JCPOA negotiations with Iran in Vienna, despite the deal's inherent structural weaknesses which allowed Iranian noncompliance to continue throughout the last five years.

Iran's nuclear proliferation since 2020 has significantly reduced the breakout time required for Iran to develop nuclear weapons, bringing it down to just six months. This has been allowed to happen through the implementation of structurally weak mechanisms which fail to hold a noncompliant Iran to any form of meaningful account. These failures must be addressed in a meaningful and robust manner before any attempt is made to enter back in to a JCPOA framework.

Below is a summary of Iran's most significant nuclear violations of the JCPOA since its implementation in January 2016, verified by the IAEA. These violations have resulted in the reduced breakout time which Iran now enjoys.

- **February 2016:** The IAEA confirmed that Iran was exceeding the limit for heavy water production by over 900 kg.

⁴² "Timeline of Nuclear Diplomacy with Iran", Arms Control Association, <https://www.armscontrol.org/factsheets/Timeline-of-Nuclear-Diplomacy-With-Iran>.

- **November 2016:** The IAEA confirmed that Iran was exceeding the limit for heavy water production by over 100 kg. Both the February and November heavy water breaches were direct violations of Annex 1, C.14 of the JCPOA.
- **July 2019:** The IAEA confirmed that Iran had breached the 300 kg limit on uranium gas enriched to 3.67%, set out in Paragraph A.7 of the JCPOA.
- **July 2019:** The IAEA verified that Iran had enriched uranium to produce 4.5% uranium-235 at the Natanz enrichment plant, in violation of Paragraph A.5 of the JCPOA.
- **September 2019:** The IAEA reported that Iran began constructing centrifuge rotor tubes using carbon fibre material not subject to continuous IAEA surveillance. This was in breach of Annex 1, Paragraph R.79 of the JCPOA.
- **November 2019:** In continued breach of Paragraph A.7, Iran announced that it had enriched uranium to 4.5% U-235, and that its low enriched uranium stockpile now totalled over 500 kg.
- **November 2019:** The IAEA detected natural uranium particles of anthropogenic origin at a location in Iran that had not been declared to the agency. This was in contravention of Annex 1, O.69, and Annex 1, F.31.
- **November 2019:** The IAEA verified that Iran had amassed 372.3 kg of enriched uranium, including 159.7 kg of UF₆ enriched to 4.5% uranium-235, in breach of Paragraph A.7 of the JCPOA.
- **March 2020:** The IAEA announced that Iran's stockpile exceeded 1000 kg of uranium enriched up to 4.5%. This was a continued breach of Paragraphs A.5 and A.7. Iran also enriched uranium using additional centrifuges at the Fordow facility.
- **April 2020:** An AEOI (Atomic Energy Organisation of Iran) spokesman claimed that Iran had produced 60 new advanced centrifuges each day, and that it planned to significantly increase its enriched uranium output.
- **September 2020:** The IAEA's quarterly report detailed Iran's continued efforts to expand its enriched uranium stockpile up to 4.5% uranium-235, in continued breach of Paragraph A.7.
- **November 2020:** Iran's Parliament approved a provisional bill calling on the AEOI to begin enriching up to 20% uranium-235 at the Fordow facility, which would further breach Paragraphs A.5 and A.7.
- **November 2020:** The IAEA reported that Iran's stockpile of uranium gas was enriched up to 4.5% uranium-235 equated to 2443 kg, an increase of 338 kg from the last quarter, in further breach of Paragraph A.7.
- **November 2020:** The IAEA reported that Iran had enriched uranium using advanced IR-2m centrifuges at Natanz. This marked a further violation of Paragraph A.2 which states that Iran can only enrich uranium using IR-1 machines.
- **December 2020:** Iran's Guardian Council approved legislation mandating the AEOI to increase enrichment levels to 20%, and suspend implementation of the Additional Protocol if sanctions were not addressed in 60 days.
- **December 2020:** Iran constructed the underground Fordow enrichment facility, breaching Paragraph A.5.
- **January 2021:** Iran enriched uranium to 20% uranium-235 in a further breach of Paragraph A.7.
- **January 2021:** The AEOI announced that Iran was in the process of installing one thousand new IR-2m centrifuges. This was a further breach of Paragraphs A.2 and A.7.

- **January 2021:** The IAEA released a report detailing Iran's plans to conduct research and development activities into uranium metal production, in violation of Annex 1, E.25. This prohibits Iran from producing or acquiring uranium metal for 15 years.
- **January 2021:** The Iranian Government announced that if US sanctions were not lifted by February 2021, it would prevent the IAEA from carrying out snap inspections. Inspections take place under the Additional Protocol, which Iran agreed to abide by in Paragraph A.1 of the JCPOA.

As evidenced in the text and Annex A, between 2016 and 2019, Iranian nuclear proliferation was stable and the JCPOA appeared to be working as intended. However, as this report will demonstrate, Iran's actions outside of the JCPOA during this period were destabilising other aspects of regional security. Therefore, in order to counter Iranian aggression in these other domains, the US withdrew from the agreement and reimposed strict sanctions to constrain the economic prowess of Iran in mid-2018.

In retaliation for the US's withdrawal from the JCPOA, the Iranian regime embarked on a strategy of open defiance in regards to the terms of the nuclear deal. Such defiance is highlighted in the spike of breaches between 2019 and 2021. From the recent refusal to engage with IAEA snap inspections, to the announcement of plans to research and develop its uranium production programme, Iran's commitment to contain its nuclear programme is no longer apparent.

Crucially, the UK and its allies within the region are faced with an increasingly hostile and unstable geopolitical environment. The JCPOA is no longer fit for purpose under contemporary developments and must be swiftly addressed by the P5+1 signatories of the JCPOA, as well as by regional neighbours (i.e. Saudi Arabia and Israel) who were previously omitted from negotiations. As this report will highlight in the subsequent chapters, a new JCPOA must look to encompass the broader security challenges within the region – as well as the central issue of nuclear proliferation – if it is to be successful.

Chapter 4: Iran's ICBM Development

The inherent inability to constrain Iran's missile programme is one of the most contentious issues surrounding the JCPOA and its supporting component, UNSC Resolution 2231. UNSC Resolution 2231 was unanimously passed by the UN Security Council on 20 July 2015, with the contents of the resolution endorsing the JCPOA and scheduling the lifting of sanctions on Iran as a consequence of its compliance with the deal.⁴³

Whilst providing guidance on the lifting of sanctions, the resolution also attempted to outline rules and expectations pertaining to broader security issues within the region. In regards to Iran's ICBM programme, UNSC Resolution 2231, Annex B, Paragraph 3, states that:

Iran is called upon not to undertake any activity related to ballistic missiles designed to be capable of delivering nuclear weapons, including launches using such ballistic missile technology, until the date eight years after the JCPOA Adoption Day or until the date on which the IAEA submits a report confirming the Broader Conclusion, whichever is earlier.⁴⁴

Notably, the language used in Resolution 2231 diverged from its predecessor, Resolution 1929. UNSC Resolution 1929 was passed on 9 June 2010 in an attempt to encourage dialogue with Iran over the ongoing JCPOA negotiations at the time. Within the resolution, it asserts that:

...Iran shall not undertake any activity related to ballistic missiles capable of delivering nuclear weapons, including launches using ballistic missile technology, and that States shall take all necessary measures to prevent the transfer of technology or technical assistance to Iran related to such activities.⁴⁵

Crucially, such an alteration in the language between the resolutions – moving from “shall not” under Resolution 1929 to “called upon” in Resolution 2231 – has resulted in a legal grey area in regards to Iran's ICBM programme and its ability to conduct ballistic missile tests.⁴⁶ In a joint letter to the Secretary-General of the United Nations, Ban Ki-moon, the US, UK, France, and Germany accused Iran of “defying” UNSC Resolution 2231 due to Iran conducting missile tests that were “inherently capable of delivering nuclear weapons”.⁴⁷ Significantly, the letter did stop short of claiming that the tests were illegal.

Despite this grey area surrounding Iran's ICBM development and testing, the regime continues to arm the Houthis in Yemen with cruise and ballistic missiles (evidenced in Annex C). This undisputedly falls in direct contravention of the arms embargo on Yemen and UNSC Resolution 2231. Iran's ability to do this has been made easier by the lifting of sanctions in 2016 under the JCPOA, releasing funds for the IRGC to increase this activity.

Ballistic missiles capable of delivering a payload of at least 500 kg, to a range of 300 km, are designated as Category I missile systems by the 35-nation Missile Technology Control Regime (MTCR) in its Equipment and Technology Annex. Iran possesses at least eight missile platforms capable of these means of delivery (see Annex B for more details). These missiles

⁴³ “Resolution 2231”, United Nations Security Council, 20 July 2015, [https://www.undocs.org/en/S/RES/2231\(2015\)](https://www.undocs.org/en/S/RES/2231(2015)).

⁴⁴ *Ibid.*, p.94.

⁴⁵ “Resolution 1929”, United Nations Security Council, 9 June 2010, [https://www.undocs.org/S/RES/1929%20\(2010\)](https://www.undocs.org/S/RES/1929%20(2010)), p.5.

⁴⁶ “Iran missile tests defied UN resolution, say US and European allies”, *Deutsche Welle*, 30 March 2016, <https://www.dw.com/en/iran-missile-tests-defied-un-resolution-say-us-and-european-allies/a-19149402?maca=en-rss-en-all-1573-rdf>.

⁴⁷ Louis Charbonneau, “Iran missile tests were ‘in defiance of’ U.N. resolution – U.S., allies”, *Reuters*, 29 March 2016, <https://www.reuters.com/article/us-iran-missiles-idUSKCN0WV2HE>.

are internationally regarded as capable of delivering nuclear weapons,⁴⁸ thus demonstrating the need for firmer rules surrounding Iran's increasingly potent ICBM programme.

Furthermore, restrictions placed upon Iran's ballistic missile programme expire eight years from the adoption of UNSC Resolution 2231. This leaves Iran free from 18 October 2023 to advance its ballistic missile programme and to acquire equipment from other countries that facilitate the development of nuclear-capable ballistic missiles.⁴⁹ This is a significant threat to regional security as it will allow Iran to purchase a much wider – and more sophisticated – range of technology after 2023. Moreover, Iran could supply these ballistic missiles to both the Houthis in Yemen and to Hezbollah in Israel, in addition to attacking Coalition forces in Iraq with such weapons.

The US Defense Intelligence Agency's 2019 report on Iran's military power concluded that: "Iran continues to depend on foreign suppliers for critical [missile] components and technology".⁵⁰ The success of the Iranian missile programme and the speed of its development would not have been possible without extensive foreign assistance, notably from North Korea, Russia, and China. North Korea furnished the basic hardware for liquid-fuelled rocket propulsion; Russia supplied materials, equipment, and training; China supplied help with guidance and solid-fuelled rocket propulsion.⁵¹

Significantly, both Russia and China facilitate Iranian regional aggression. Both sit on the UN Security Council and veto US attempts to enforce Iranian arms embargoes and its ballistic missile programme;⁵² and, by helping Iran to advance its missile programme, they are also complicit in facilitating Iranian violations of UNSC Resolution 2231 and the JCPOA. Chinese and Russian support of Iran's missile programme is a direct threat to both British and American interests in the Gulf, in addition to those of their allies Saudi Arabia and Israel.

Since the implementation of the JCPOA and UNSC Resolution 2231, Iran has frequently breached the MTCR, undermining the long-term goals of the JCPOA by developing and testing ballistic missiles which are capable of delivering a nuclear payload. Therefore, any return to the JCPOA must incorporate additional measures that curtail Iran's ICBM programme, most fundamentally, an extension of the missile embargo which is due to expire in October 2023. In addition, the continued breaches of the MTCR remain a significant cause for concern. The JCPOA's inability to enforce restrictions on Iran's missile programme continues to be a significant structural weakness which urgently requires addressing.

⁴⁸ Robert Einhorn and Vann H. Van Diepen, "Constraining Iran's Missile Capabilities", *Brookings*, March 2019, https://www.brookings.edu/wp-content/uploads/2019/03/FP_20190321_missile_program_WEB.pdf. See also "Equipment, Software, and Technology Annex", Missile Technology Control Regime, 22 March 2018, http://mtcr.info/wordpress/wp-content/uploads/2016/03/MTCR-TEM-Technical_Annex_2018-03-22.pdf.

⁴⁹ "Iran's Ballistic Missile Programme", United Against Nuclear Iran, March 2021, https://www.unitedagainstnucleariran.com/sites/default/files/UPDATE_UANI_Ballistic%20Missile%20Report_03162021_clean.pdf, p.5.

⁵⁰ "Iran: Military Power", Defense Intelligence Agency, August 2019, https://www.dia.mil/Portals/27/Documents/News/Military%20Power%20Publications/Iran_Military_Power_LR.pdf.

⁵¹ *Ibid.* See also "Iran's Missile Programme: Past and Present", *Iran Watch*, 29 June 2020, <https://www.iranwatch.org/our-publications/weapon-program-background-report/history-irans-ballistic-missile-program#Current%20Ballistic%20Missile%20Capabilities>.

⁵² Louis Charbonneau, "Iran missile tests were 'in defiance of' U.N. resolution".

Chapter 5: Houthi Attacks Against Saudi Arabia

The Iranian Government maintains a vested interest in supporting the Shia Houthi movement in Yemen, which the US proscribed as a terrorist organisation in 2020. The Houthis continue to employ Iranian military advisers and to conduct aerial attacks against Saudi Arabia using Iranian missiles. These attacks have increased considerably since 2018, particularly through both cruise and ballistic missiles, and more recently from UAV loitering drone attacks. The Houthis mainly direct these aerial strikes against static Saudi military targets, critical national infrastructure, and Saudi Arabia's sizeable oil infrastructure. These aerial attacks, usually launched from Yemen but also from Iran due to its geographical proximity to Saudi targets, have a destabilising impact on US and British interests in the region. Both the US and the UK maintain military assets and personnel at military facilities in Saudi Arabia,⁵³ which can be targeted by these Iranian/Houthi aerial attacks. In addition, the attacks launched against Saudi Aramco had enormous repercussions for the global economy. The lack of a robust military response in the immediate aftermath of the September 2019 Saudi Aramco attack only emboldened both the Houthis and Iran to increase aerial attacks.

Iran protects its interests in Yemen by placing senior IRGC and Quds Force commanders among Houthi units to coordinate attacks against Saudi Arabia. This covert Iranian presence also takes an overt form in the role of a diplomatic council and an 'Ambassador' to the unrecognised Houthi Government. Senior IRGC commanders play a more clandestine role, planning and leading Houthi attacks. The Iranian regime's actions highlight how terrorist entities are often reliant on support from state actors, as demonstrated by the US State Department's classification of Iran as a state-sponsor of terrorism.⁵⁴ These are very complex and multi-faceted issues which the JCPOA does not address and which UNSC Resolution 2231 is too weak to enforce. The UK Government needs to give serious consideration to these problems given the extent to which Iranian actions seriously threaten Britain's national interests across the region.

The IRGC's destabilising role in Yemen can be evidenced by the explosion of the IRGC vessel the *Saviz*, which was attacked in April 2021. Following the explosion on the *Saviz*, the Yemeni Government issued warnings against the violation of Yemeni territorial waters by Iranian vessels.⁵⁵ The IRGC's ability to fund, arm, and support the Houthis has increased since the JCPOA sanctions relief began in 2016, as reflected by increasing evidence of Iranian-made and supplied missiles used against Saudi Arabia by the Houthis.

5.1 Houthi missile attacks on Saudi Arabia, 2015 to present

In its latest report, dated January 2021, the UN Panel of Experts on Yemen noted that there is an increasing body of evidence to suggest that individuals or entities in Iran are supplying "significant volumes of weapons and components to the Houthis",⁵⁶ and documented a growing body of evidence that substantiates claims of Houthi military and lethal aid by the IRGC. On 22 September 2020, Brigadier General Abolfazl Shekarchi, a spokesperson of the Iranian armed forces, was quoted as saying, "we provided them (Yemenis) with the experiences in technology

⁵³ Nancy A. Youssef, "Esper Tours Saudi Military Site as U.S. Readies Troop Buildup", *The Wall Street Journal*, 22 October 2019, <https://www.wsj.com/articles/esper-tours-saudi-military-site-as-u-s-readies-troop-buildup-11571772446>. See also: Mike Lewis and Katherine Templar, "UK personnel supporting the Saudi armed forces — Risk, knowledge and accountability", *mikelewisresearch*, 2018, <https://www.mikelewisresearch.com/RSAFfinal.pdf>.

⁵⁴ "State Sponsors of Terrorism", U.S. Department of State, <https://www.state.gov/state-sponsors-of-terrorism/>.

⁵⁵ Farnaz Fassihi, Eric Schmitt and Ronen Bergman, "Israel-Iran Sea Skirmishes Escalate as Mine Damages Iranian Military Ship", *The New York Times*, 27 April 2021, <https://www.nytimes.com/2021/04/06/world/middleeast/israel-iran-ship-mine-attack.html>.

⁵⁶ UN Panel of Experts on Yemen, "Letter dated 22 January 2021 from the Panel of Experts on Yemen addressed to the President of the Security Council", UN Security Council, https://reliefweb.int/sites/reliefweb.int/files/resources/S_2021_79_E.pdf, p.2.

in the defense (*sic*) sphere”.⁵⁷ This admission puts Iran in direct breach of paragraph 14 of UN Resolution 2216 (2015) – the Yemeni arms embargo.⁵⁸ While the ongoing civil war in Yemen is multi-faceted, with many competing causal factors, Iran’s destabilising influence acts as an enhanced capability for the Houthis. Annex C contains a full list of verified Houthi missile attacks on Saudi Arabia.

In its report, the UN Panel of Experts on Yemen showed that individuals or entities within Iran are engaged in smuggling weapons directly to the Houthis in Yemen, either via land over Oman or by sea, in further violations of paragraph 14 of Resolution 2216 (2015).⁵⁹ The Panel concluded that the increase in Houthi aerial attacks (missiles and UAV drones) on Saudi Arabia is due to the “flows of weapons and weapons components in violation of the targeted arms embargo”.⁶⁰ The Houthis have used these Iranian supplies to attack Saudi Arabian targets, including its oil infrastructure, and to carry out indiscriminate attacks that have led to the deaths of innocent civilians. The full list of Houthi missile attacks can be found in Annex C. This annex provides a full list of Houthi missile attacks against Saudi Arabia, with the data taken from either the United States Institute of Peace’s Iran Primer,⁶¹ or from the UN Panel of Experts on Yemen, unless separately footnoted.

In addition, there have been many cases of arms shipments – almost certainly originating from Iran⁶² – being intercepted by regional security actors. This includes the *USS Forrest Sherman* in November 2019, which intercepted a dhow carrying, among other contraband, components for the Quds-1 cruise missile, a C802 anti-ship cruise missile, and a third, unidentified, cruise missile.

The majority of Houthi missile attacks against Saudi Arabia target static Saudi military targets, including airfields where US and British military personnel are deployed; civilian targets in residential areas including Riyadh; or critical national infrastructure, including the Saudi Aramco facilities. These attacks steadily increased after the sanctions relief from the JCPOA between 2017 and 2018, before reducing significantly after the US reimposed sanctions on Iran in late 2018. Despite a brief spike between 2019 and 2020, ballistic missile attacks have not reached anywhere near the 2017–2018 levels.

The Houthis began using the Quds-1 cruise missile from June 2019, exactly one month after Iran began seriously reneging on its nuclear commitments under the JCPOA. This was when Tehran announced that it would no longer be bound by limitations on enriched uranium and heavy water reserves, in breach of Paragraph A.7 of the JCPOA. Iran also threatened to restart construction on the unfinished heavy water reactor at Arak and resume higher level enrichment in the future.

The Quds-1 missile was identified in at least four different attacks on civilian targets in Saudi Arabia that year: two strikes on Abha International Airport on 12 June and 28 August 2019, an attack on the water-desalination plant in Shuqayq on 19 June 2019, and attacks on the Saudi Aramco facilities on 14 September 2019. The Quds-1 cruise missile was first publicly displayed by Houthi-affiliated media on 7 June 2019.⁶³ The UN Panel of Experts on Yemen assessed that

⁵⁷ “Iran has supplied Yemen with defense Know-How: Spokesman”, *Tasnim News Agency*, 22 September 2020, <https://www.tasnimnews.com/en/news/2020/09/22/2354460/iran-has-supplied-yemen-with-defense-know-how-spokesman>.

⁵⁸ United Nations Security Council, “Resolution 2216 (2015)”, United Nations Security Council, 14 April 2015, [https://www.undocs.org/S/RES/2216%20\(2015\)](https://www.undocs.org/S/RES/2216%20(2015)), p.5.

⁵⁹ *Ibid.*, see paras.76, 84–85 and 88.

⁶⁰ UN Panel of Experts on Yemen, “Letter dated 22 January 2021”, p.7.

⁶¹ “Timeline of Houthi Attacks on Saudi Arabia”, *The Iran Primer*, 16 September 2019, <https://iranprimer.usip.org/blog/2019/sep/16/timeline-houthi-attacks-saudi-arabia>.

⁶² UN Panel of Experts on Yemen, “Letter dated 27 January 2020 from the Panel of Experts on Yemen addressed to the President of the Security Council”, UN Security Council, <https://undocs.org/en/S/2020/326>, p.19.

⁶³ *Ibid.*, p.23.

the Quds-1 missile was assembled in Yemen using Iranian technological experience, in violation of Resolution 2231. The Panel cited lack of Yemeni experience and knowledge in assembling the Quds-1 missile.⁶⁴ This is further evidence of significant Iranian violations of Resolution 2231 since 2019.

5.2 Houthi drone attacks on Saudi Arabia

Iran began to renege significantly on its nuclear commitments under the JCPOA from May 2019, in the same month that Houthi UAV drone strikes began to rise. In 2020, the UN Panel of Experts on Yemen noted that these attacks coincided with the escalation in regional tensions over the JCPOA, which seemed intended to potentially force Saudi Arabia to adopt a more conciliatory approach towards the Houthis.⁶⁵

The advent of suicide drone UAV technology, funded and sourced by the IRGC, is a worrying trend emerging in the Yemen conflict. If it were not for the Saudi air defences, more IRGC-supplied cruise and ballistic missiles would successfully land inside Saudi Arabia, destroying infrastructure also important to the UK's economic interests. However, Saudi Arabia's air defences, although integrated and layered, are not designed for the mass swarm UAV technology which is increasingly used by the Houthis with direct support from the IRGC.

A troubling recent development is an unveiling by the Iranian military of a new generation of suicide drones, which can now hit targets at a range of 4000 km – twice the range of older models.⁶⁶ This follows from October 2020 when the IRGC unveiled fast attack boats equipped with Ababil-2 suicide drones, deployed to its naval force in the Sea of Oman and the Persian Gulf. These recent developments will severely threaten the Royal Navy-led Carrier Strike Group heading into the Red Sea, the Sea of Oman, and the Indian Ocean from summer 2021 onwards.⁶⁷ The increased range of the new Iranian-manufactured drones – which will likely be used by the Houthis – will be a cause for serious concern for the Royal Navy operating across the region throughout the remainder of 2021.

Annex D provides a full list of all verified Houthi drone attacks on Saudi Arabia from their advent in 2018 up until May 2021. Although the first recorded drone attack occurred in 2018, they really began developing in 2019, with the number of strikes remaining consistent throughout 2020. Throughout 2021, however, there has been an exponential increase in attacks: of the 56 recorded drone strikes since 2018, 28 occurred between January and May 2021. This recent increase in drone strikes corresponds with various developments, including: the reduced success rate for Houthi missile strikes (due to an effective Saudi air defence system); the increased technological development of drones, including both lethality and range; Iranian political desire to increase leverage over the new US administration throughout 2021, in relation to ongoing JCPOA negotiations; and the relatively cheap and compact design of UAV drone systems compared to cruise missiles, making them much easier for the IRGC to illegally smuggle to Yemen.

While the means of delivery at the tactical level has changed to now include this new and increasing threat from UAV drone technology, the operational and strategic aims of both the Houthis and Iran remain constant. The Iranian funding of the Houthis, with IRGC command

⁶⁴ UN Panel of Experts on Yemen, "Letter dated 27 January 2020 from the Panel of Experts on Yemen addressed to the President of the Security Council", UN Security Council, <https://undocs.org/en/S/2020/326>, p.24.

⁶⁵ *Ibid.*, p.19.

⁶⁶ "Iran Reveals New Long-Range Combat, Surveillance Drone", *Defense World*, 24 February 2021, <https://www.defenseworld.net/news/29043/#.YJOBbKhKg2w>.

⁶⁷ "RAF Marham personnel make final preparations for CSG21", *RAF News*, <https://www.raf.mod.uk/news/articles/raf-marham-personnel-make-final-preparations-for-csg21/>.

and control on the ground in Yemen, has not changed. The direct funding and arming of the Houthis breaches the ongoing Yemen arms embargo under UNSC Resolution 2231. Such an occurrence further exemplifies how the JCPOA and its supporting bodies fail to adequately address Iran's role in regional destabilisation via the sponsorship of proxy organisations.

As the Supreme Leader sets the national security agenda for Iran, the Government in Tehran has little agency or inclination to abide by international mechanisms that directly contravene the Supreme Leader's strategic vision. In relation to the Houthi drone attacks against Saudi Arabia, the UK Government must consider greater support to the Saudis against these increasing drone attacks. As stated, the Saudi air defences, although layered and integrated, lack the latest sophisticated technology to identify and subsequently defeat low-flying loitering UAVs. In line with the IR, the UK needs to engage further with Saudi Arabia on regional security matters. The ability to detect and defeat increasingly sophisticated Iranian drone technology, pioneered by the Houthis with increasing precision and lethality, is certainly one area for common concern and thus requires action.

Chapter 6: Iranian Attacks on Coalition Forces in Iraq

Iran has long maintained significant influence in Iraq's domestic security affairs. During the Iraq War (2003–11) the Pentagon calculated that Iranian-provided weapons killed at least 603 US personnel.⁶⁸ This included Iranian signature systems such as rockets, explosively formed penetrators (EFPs), improvised rocket-assisted munitions (IRAMs), rocket-propelled grenades, and large-calibre rifles. Iran had a similar role in coordinating Shia attacks via the IRGC-controlled Mehdi army – a militia controlled by the radical Shia cleric Moqtada Sadr – against British forces in the south of Iraq around Basra between 2003 and 2009. In 2005 alone, British officials believe that all eight UK armed forces personnel deaths in Iraq could be traced to Iran.⁶⁹

These attacks on Coalition forces abated after 2011, particularly as the threat from the Sunni insurgency and the subsequent rise of ISIL threatened Iranian interests. This period can be seen almost as an uneasy truce between the two factions while fighting a common enemy;⁷⁰ the 'Tikrit Agreement' stipulated that the two sides would refrain from encroachment upon one another's space while both fighting against ISIL. However, tensions between Coalition forces and Iran-backed militias reoccurred as early as June 2016,⁷¹ as it became clear that Iran was using militias fighting ISIL to consolidate its regional powerbase.⁷² Iranian-backed harassment against Coalition forces later recommenced as tensions with Tehran increased under the Trump administration.⁷³

The role of the IRGC during the Iraq War, supplying and supporting the various Shia militias who attacked Coalition forces, reflected Iran's wider strategic interest in the region: namely, attacking US and British forces and interests in order to scale back Western presence across the Arabian Peninsula.

A full list of the IRGC-controlled Shia militia attacks against Coalition forces is located in Annex E. The attacks listed in this annex are included because they have been verified and thus validated by reputable sources, including Coalition military statements and third-party non-governmental organisations, as well as by independent media. Many more attacks are quoted in open-source media and articles, but these are unsubstantiated by verifiable reports from either the Coalition military or reputable multinational agencies such as the UN, and have therefore been disregarded here. A combination of the high volume of smaller-scale attacks, in addition to their general ineffectiveness, means that a large quantity of these smaller-scale attacks have not been subsequently verified by the reputable reporting chains listed above.

Between 2017 and May 2021 there were 59 reported attacks by Iraqi militias. Of these 59 attacks, four were IEDs (Improvised Explosive Device) and roadside bombs, while the remainder, apart from the attempted siege to the US Embassy in December 2019, were aerial attacks: either 107 mm rockets, ballistic missiles, or mortars. The most common targets for these aerial attacks were: Camp Taji, located approximately 27 kms north of Baghdad, which was attacked on at

⁶⁸ Kyle Rempfer, "Iran killed more US troops in Iraq than previously known, Pentagon says", *Military Times*, 4 April 2019, <https://www.militarytimes.com/news/your-military/2019/04/04/iran-killed-more-us-troops-in-iraq-than-previously-known-pentagon-says/>.

⁶⁹ "Iran 'behind attacks on British'", *BBC News*, 5 October 2005, http://news.bbc.co.uk/1/hi/world/middle_east/4312516.stm.

⁷⁰ Krishnadev Calamur, "Trump's Latest Warning to Iran Didn't Come Out of Nowhere", *The Atlantic*, 12 September 2018, <https://www.theatlantic.com/international/archive/2018/09/trump-warns-iran-shia-militia-iraq/569989/>.

⁷¹ Dan De Luce and Henry Johnson, "Can the U.S. Control Iran's Militias in the Fight for Fallujah?", *Foreign Policy*, 9 June 2016, <https://foreignpolicy.com/2016/06/09/can-the-u-s-control-irans-militias-in-the-fight-for-fallujah-shiite-iraq-isis/>.

⁷² Martin Chulov, "Amid Syrian chaos, Iran's game plan emerges: a path to the Mediterranean", *The Guardian*, 8 October 2016, <https://www.theguardian.com/world/2016/oct/08/iran-iraq-syria-isis-land-corridor>.

⁷³ Michael Knights, "Responding to Iranian Harassment of U.S. Facilities in Iraq", *The Washington Institute for Near East Policy*, 21 May 2019, <https://www.washingtoninstitute.org/policy-analysis/responding-iranian-harassment-us-facilities-iraq>.

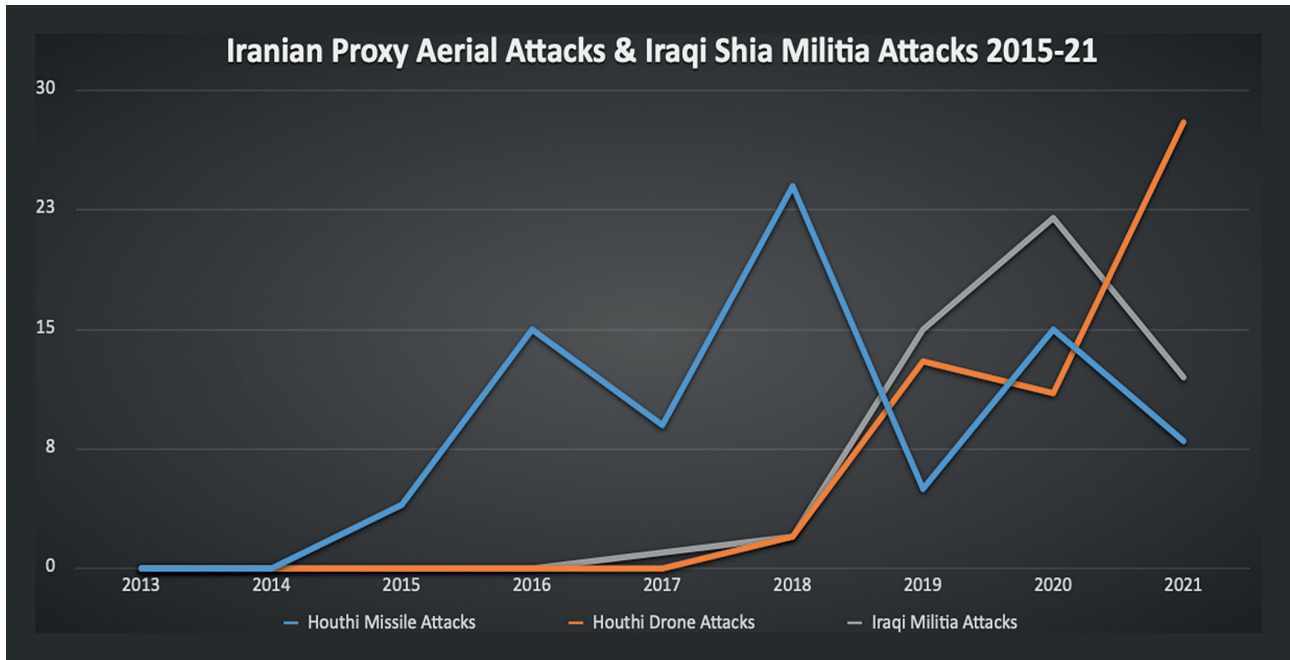
least six occasions with over 71 rockets; Balad Airbase, located 40 miles north of Baghdad, which was attacked on seven different occasions between June 2019 and May 2021, by at least 23 rockets or mortars, and included a UAV drone attack; and Al-Asad Airbase in Anbar province, which was attacked at least five times between December 2018 and May 2021 – including an attack by dozens of missiles launched from Iran by the IRGC in January 2020 in retaliation for the targeted killing of Qassem Solemani. The US Embassy in Baghdad has also been subjected to frequent barrages from both Iran and from the IRGC-controlled PMF: there were ten attacks between September 2018 and December 2020, by at least 21 rockets and missiles, including the attempted siege in December 2019 by Kata'ib Hezbollah and the PMF.

The number of attacks against Coalition forces and bases in Iraq rose significantly throughout the second half of 2020, the year when injuries and fatalities spiked. Four British civilians were killed (in the downing by the IRGC of Ukrainian Airlines Flight 752) and one British military personnel member was killed. Hundreds of US military personnel were injured in 2020 (the majority suffering traumatic brain injuries caused by the ballistic missile strike at al-Asad Airbase in revenge for the targeted killing of Qassem Solemani in January 2020), and there were two deaths. In addition, there were at least nine Iraqi casualties caused by Iranian-controlled strikes at Coalition bases in 2020.

However, at the current rate, attacks in 2021 will overtake the previous year by some margin (at least – although likely much higher – 24 verified attacks in 2021, compared to 14 by May 2021). Reflecting the deteriorating security situation for Coalition personnel, IRGC-controlled PMF leaders refused to enter negotiations with the US and reiterated their commitment to continued attacks until the US left Iraq.

The JCPOA and its supporting component, UNSC Resolution 2231, do nothing to address this worsening security situation for both British and American interests in the Gulf beyond Iranian nuclear proliferation. It is a further indication of Iranian strategic intent to roll back US and Western influence from the Gulf. Any renegotiation of the JCPOA by the US must include mechanisms which address Iran's continued arming and coordinating of the PMF, and their attacks against British and American personnel in Iraq.

Chapter 7: Analysis of Iranian Proxy Attacks



Graph 1: All Houthi and Iraqi militia attacks up to 5 May 2021.

The data collected on the Iranian-facilitated Houthi aerial attacks on Saudi Arabia and the Iranian-controlled Iraqi Shia militia attacks on Coalition forces in Iraq all highlight many important findings.

1. The cruise and ballistic missile attacks into Saudi Arabia steadily increased after the implementation of the JCPOA in October 2015. The peak year for attacks was 2018, with 24 strikes occurring. The supply of cruise and ballistic missiles to the Houthis by Iran, coordinated by senior IRGC commanders inside Yemen, directly contravenes the arms embargo on Yemen under UNSC Resolutions 2216 and 2231, thus also undermining the JCPOA.
2. The Houthi drone strikes against Saudi Arabia increased significantly from 2019 onwards, with 2021 looking set to increase further still. This is a worrying development not just for Saudi Arabia but also for US and British interests in the country. Despite not recording as many fatalities as the Houthi's missile strikes, drone strikes are used to effectively target Saudi Arabia's oil infrastructure. This is due to Saudi air defences not being designed to intercept small, low-flying drone technology. This trend was most evident in March 2021, when there were at least three separate drone attacks against Saudi oil infrastructure. The inability of the Saudi defences to intercept, interdict and neutralise Houthi drone attacks was exemplified in 2021, where data up to April shows that marginally more attacks were successful than were intercepted by Saudi air defences.
3. The number of IRGC-controlled Shia militia attacks against Coalition forces in Iraq has significantly risen since 2018. From that year, all the attacks by Iranian-controlled or supported Shia militias were recorded after May, when the US announced that it would withdraw from the JCPOA. The low number of attacks before May 2018 could also be associated in part with the conclusion of the Tikrit Agreement between Coalition forces in Iraq and the IRGC-controlled elements of the PMF. December 2017 saw the

Iraqi Government declare the end of the war against the so-called Islamic State⁷⁴ and, with it, the subsequent disintegration of the Tikrit Agreement between the PMF and Coalition forces. The ensuing scale of the increased attacks against Coalition forces from 2018 onwards demonstrates how Iran is able to use its regional proxy forces to leverage greater diplomatic pressure as a tool of policy and statecraft, and at a considered point in time and space of their choosing.

Iran continues to apply pressure on the US for sanctions relief throughout 2021, despite ever-growing noncompliance under both Resolution 2231 and the JCPOA. One noticeable method by which Iran applies this pressure is through the IRGC-controlled militias in Iraq conducting attacks against British and American forces. Iran has been attempting to use coercion, intimidation, and deadly force against British and US personnel in order to leverage much-needed sanctions-relief. This method by Iran has become even more apparent throughout 2021 as the new US administration attempts to renegotiate the JCPOA with Iran. The intensity of IRGC-coordinated attacks in the second quarter of 2021 is highly indicative of this Iranian tactic of utilising its proxy forces to assert diplomatic leverage at a point in time of its choosing; in this instance, the ongoing JCPOA negotiations occurring in Vienna.

In the short to medium term (one- to three-year period), the data suggests that it is likely that cruise and ballistic missile attacks will still occur from Houthi territory, coordinated and facilitated by the IRGC, but at a decreasing rate. The Saudi air defence systems require continuous upgrading, now even more so in light of US Patriot batteries being rotated out of Saudi Arabia. These were installed in the aftermath of the destructive September 2019 Saudi Aramco attacks, but have now rotated out of Saudi Arabia (reassigned to Iraq and back to the US).⁷⁵ This was a troubling development, with Iranian-supplied Houthi cruise missiles still successfully striking Saudi Arabian targets, including as recently as the 26 March 2021 strike on the Saudi Aramco facility at Jizan. While less frequent, cruise and ballistic missile strikes will evidently continue to occur with little to deter the continued Iranian facilitation of the missiles. Such actions demonstrate the failure of UNSC Resolution 2231 in providing clarity, enforceability and stability in the area of Iranian ICBM programmes. Consequently, stability in the region has continued to spiral, further undermining the potency of the JCPOA in maintaining control over Iran's nuclear programme, due to the fact that influential actors have become understandably distracted by other issues of regional security.

In the short term, the influx of UAV drone strikes will likely continue to surge. The nature of their loitering technology – hard for Saudi Arabia's conventional air defences to discover – will ensure that this form of aerial attack will almost certainly increase. The relatively lower costs associated with drones compared to cruise and ballistic missiles, in addition to their smaller and therefore more undetectable size, will also make them more popular with Iranian smugglers who continue to ship them into Yemen in direct defiance of Resolution 2231. The threats posed to Saudi security by the increasing proliferation of drone attacks, in addition to the oil infrastructure targeted by the Iranian-supplied drones which threatens British and American interests, requires addressing during the JCPOA renegotiations – particularly by the US and the UK who should support Saudi Arabia's legitimate security concerns, in addition to safeguarding their own interests.

The IRGC-controlled Shia militias will likely continue to attack Coalition forces in Iraq at precise moments when Iran wishes to apply pressure to the US. With the ongoing US-led

⁷⁴ "Iraq declares war with Islamic State is over", *BBC News*, 9 December 2017, <https://www.bbc.co.uk/news/world-middle-east-42291985>.

⁷⁵ Tommy Hilton, Ismaeel Naar and Lauren Holtmeier, "Saudi Arabia to replace US missile defenses at oil sites, relations strong: Experts", *Alarabiya News*, 11 May 2020, <https://english.alarabiya.net/features/2020/05/11/Saudi-Arabia-to-replace-US-missile-defenses-at-oil-sites-relations-strong-Experts>.

negotiations attempting to bring Tehran back to nuclear compliance, attacks by Shia militia will almost certainly continue. These will likely increase at times when Iran wishes to apply its own 'maximum pressure' on Washington, in line with the data collected in this report. The withdrawal of Lockheed Martin in May 2021 from Balad Airbase, due to increasing attacks, signifies that the security situation on Coalition bases in Iraq is deteriorating and will likely worsen still, based on current trends and the frequency of such attacks. The undeniable role which the IRGC maintains in Iraq, further destabilising Iraqi, British and American security, is a demonstrable consequence of Iran's strategic intent in the region, and further highlights how the JCPOA, in its current form, does not adequately address these security challenges.

Crucially, some of the US sanctions imposed after May 2018 for continued Iranian noncompliance were established precisely to deal with broader Iranian security threats which the JCPOA was too weak to incorporate before its implementation. These US sanctions included measures to punish continued Iranian funding of regional proxy and terrorist forces which routinely threaten American and British interests in Iraq.⁷⁶ These include H.R. 361, the Iranian Proxies Terrorist Sanctions Act of 2019, and H.R. 571, the Preventing Destabilization of Iraq Act of 2019.⁷⁷ US officials involved in the ongoing JCPOA renegotiations will potentially scrap these sanctions, due to Iranian insistence that they were added by the Trump administration and are not related to Iran's nuclear noncompliance, and are therefore illegitimate in the eyes of Tehran. This insistence by Iranian officials is central to their negotiating strategy,⁷⁸ and worryingly, with increased IRGC-controlled attacks in Iraq continuing, the US may relent and drop these sanctions aimed at limiting Iran's control over regional proxy organisations and their ability to strike against Coalition forces.

⁷⁶ Tasra Naji, "Iran nuclear deal: Shadow of sabotage hangs over critical talks", *BBC News*, 14 April 2021, <https://www.bbc.co.uk/news/world-middle-east-56716472>.

⁷⁷ "Iran Sanctions", Congressional Research Service, 6 April 2021, <https://fas.org/sgp/crs/mideast/RS20871.pdf>.

⁷⁸ Maziar Motamedi, "Iran says 'no step-by-step plan' for lifting US sanctions", *Aljazeera*, 3 April 2021, <https://www.aljazeera.com/news/2021/4/3/iran-says-no-step-by-step-plan-for-lifting-us-sanctions>.

Chapter 8: Iranian State-based Piracy

The IRGC maintains several maritime policies in order to exert greater control over the Arabian Peninsula. These include the illegal seizure of international civilian vessels for ransom and attacking ships that belong to states with which Iran maintains hostile or tense relations. This state-sanctioned policy of international piracy affects not just civilian vessels, but military ones also. A small British military contingent was attacked and seized in 2004,⁷⁹ and again in 2007,⁸⁰ by Iranian forces. Although eventually released, the Iranians seized the personnel operating in Iraqi waters, and their treatment involved mock executions which is contrary to the Geneva Convention and international laws governing prisoner handling.⁸¹

This chapter covers illegal Iranian ship seizures and Iranian attacks on ships and maritime infrastructure since 2019. The pattern for Iranian hostility at sea is quite simple. The overall aim is to control as much as possible the international traffic which passes along its coastline, as this includes the extremely lucrative oil exports from Iraq, Kuwait, and a portion from Saudi Arabia. The IRGC Navy utilises smaller, rapid speedboats in order to interdict larger vessels.⁸² These are often able to outmanoeuvre slower ships sent to help, such as *HMS Montrose* which was too late to stop the *Stena Impro* from being seized in 2019.

Iran sees as fair game the seizure of international ships in order to increase bargaining power over ongoing political and diplomatic disputes with foreign nations. This was evidenced in January 2021 when the IRGC seized a South Korean tanker operating in international waters. Iranian officials claimed that this was due to environmental concerns – in reality it was in response to South Korean banks abiding by the ongoing US sanctions. The ability to hold diplomatic leverage, no matter the legality by which it arrived, is a central component to Iranian diplomacy.

Likewise, Iran's policy of attacking ships and maritime infrastructure across the region serves as a further means for Iran to continue its diplomatic antagonisms with rival states, but under the threshold for conflict, as opposed to all-out war. This is evidenced by Iranian denials of these attacks, despite overwhelming evidence to the contrary. Iranian denials allow the actions to continue unabated and unpunished. These acts of government-sanctioned international piracy further demonstrate that the Iranian Government is not a responsible actor in the international community, and does not respect or abide by the rules-based order. The JCPOA, an agreement which has many clauses based around goodwill, understanding, and non-binding resolutions, is made only weaker by this regional aggressive behaviour by the Iranian Government. However, it is important to note that only one of the 13 Iranian ship seizures outlined occurred whilst the United States was part of the agreement, with the following seizures in retaliation over worsening relations between Iran, its Middle Eastern neighbours and their Western allies.

8.1 List of Iranian ship seizures across the Arabian Peninsula since JCPOA implementation

18 January 2016: Two US Navy riverine command boats were seized after they strayed into Iranian waters. They were subsequently released 15 hours later.⁸³

⁷⁹ "Iran releases British servicemen", *BBC News*, 24 June 2004, http://news.bbc.co.uk/1/hi/world/middle_east/3835313.stm.

⁸⁰ "Iraq urges Iran to free sailors", *BBC News*, 26 March 2007, <http://news.bbc.co.uk/1/hi/uk/6495761.stm>.

⁸¹ *Ibid.*

⁸² Joseph Trevithick, "Iranian Speed Boat Swarm Harasses American Naval Ships At Very Close Range In Persian Gulf", *The Drive*, 15 April 2020, <https://www.thedrive.com/the-war-zone/33033/iranian-speed-boat-swarm-harasses-american-naval-ships-at-very-close-range-in-persian-gulf>.

⁸³ Sarah N. Lynch, "U.S. sailors captured by Iran were held at gunpoint: U.S. military", *Reuters*, 18 January 2016, <https://www.reuters.com/article/us-usa-iran-boats-idUSKCN0UW1Q7>.

10 July 2019: British MoD officials confirmed that three Iranian vessels had attempted and subsequently failed to divert a British tanker into Iranian waters on the previous day.⁸⁴

14 July 2019: A Panamanian-flagged fuel tanker went missing in the Strait of Hormuz.⁸⁵

- On 18 July 2019, Iran announced it had seized it on suspicion of fuel smuggling.⁸⁶
- US Central Command Chief General McKenzie was quoted by *Reuters* as saying that the US would work “aggressively” to secure free passage for ships in the region.⁸⁷

19 July 2019: Iran seized the British-flagged tanker the *Stena Impero*. Iranian Foreign Minister Javad Zarif tweeted that this was to “uphold international maritime laws”, although he never gave any evidence for this.⁸⁸

- In a statement, the then UK Foreign Secretary Jeremy Hunt called the seizure a “clear contravention of international law” and said that “Our priority continues to be to find a way to de-escalate the situation.”⁸⁹ He also claimed that it was in retaliation for the UK’s detainment of the Iranian vessel *Grace I*.
- The UK sent the Royal Navy ship *HMS Duncan* to the Gulf to escort British-flagged ships through Hormuz along with *HMS Montrose*.⁹⁰
- On 27 September the vessel was released.⁹¹

19 July 2019: Iran seized a Liberian-flagged vessel for oil smuggling.⁹²

4 August 2019: Iran seized an Iraqi vessel accused of fuel smuggling.⁹³

7 September 2019: Iranian state media claimed that Iran had seized a ship for fuel smuggling and were holding 12 Filipino crew.⁹⁴

16 September 2019: Iran seized a vessel, the *Linch*,⁹⁵ on accusations of diesel smuggling, with footage of the tanker broadcast on State TV.

30 December 2019: Iran seized a vessel accused of fuel smuggling.⁹⁶ *Aljazeera* quoted the Iranian state broadcaster’s announcement that there were 16 Malaysian nationals aboard, although they did not say from where the ship originated.⁹⁷

⁸⁴ Barbara Starr and Ryan Browne, “Iranian boats attempted to seize a British tanker in the Strait of Hormuz”, *CNN*, 11 July 2019, <https://edition.cnn.com/2019/07/10/politics/iran-attempted-seize-british-tanker/index.html>.

⁸⁵ Richard Perez-Pena, “Iran Says It Seized Foreign Tanker Escalating Regional Tensions”, *The New York Times*, 18 July 2019, <https://www.nytimes.com/2019/07/18/world/middleeast/iran-oil-tanker.html>.

⁸⁶ Press TV (@PressTV), *Twitter*, 18 July 2019, 4.20p.m., <https://twitter.com/PressTV/status/1151874429326110720>.

⁸⁷ “U.S. general says will work ‘aggressively’ to enable free passage in the Gulf”, *Reuters*, 18 July 2019, <https://www.reuters.com/article/mideast-iran-tanker-centcom-idUKD5N23V00Q?edition-redirect=uk>.

⁸⁸ Javad Zarif (@JZarif), *Twitter*, 20 July 2019, 11.48a.m., <https://twitter.com/JZarif/status/1152530835154833408>.

⁸⁹ “Iranian actions in the Strait of Hormuz: Foreign Secretary’s statement”, Gov.UK, 20 July 2019, <https://www.gov.uk/government/news/foreign-secretary-statement-on-iranian-actions-in-the-strait-of-hormuz>.

⁹⁰ “Iran tanker seizure: UK government response”, Gov.UK, 21 July 2019, <https://www.gov.uk/government/news/iran-tanker-seizure-uk-government-response>.

⁹¹ “Stena Impero Statement”, Stena Bulk, 28 September 2019, <https://www.stenabulk.com/statement/stena-impero>.

⁹² Meg Wagner, Mike Hayes, Elise Hammond and Joshua Berlinger, “Tensions soar after Iran seizes tanker”, *CNN*, 24 July 2019, https://edition.cnn.com/middleeast/live-news/iran-british-tanker-july-2019/h_d21e099835347faacc82200bb4c7452a#:text=A%20British%20flagged%20oil%20tanker,allowed%20to%20continue%20its%20course.

⁹³ “Iran ‘seizes Iraqi tanker in Gulf for smuggling fuel’”, *BBC News*, 5 August 2019, <https://www.bbc.co.uk/news/world-middle-east-49225916>.

⁹⁴ “Iran seizes ship for alleged fuel smuggling in Gulf, holds 12 Filipino crew”, *Arab News*, 7 September 2019, <https://www.arabnews.com/node/1550941/middle-east>.

⁹⁵ “Iran ‘seizes another vessel’ in Strait of Hormuz”, *The National*, 16 September 2019, <https://www.thenationalnews.com/world/mena/iran-seizes-another-vessel-in-strait-of-hormuz-1.910968>.

⁹⁶ “Iran Says Seized Tanker With ‘Illegal’ Oil In Hormuz”, *Radio Liberty*, 30 December 2019, <https://www.rferl.org/a/iran-says-seized-tanker-with-illegal-oil-in-hormuz/30352935.html#:text=But%20the%20Iranians%20said%20the,the%20semiofficial%20Fars%20news%20agency>.

⁹⁷ “Iran seizes ship, arrests 16 Malaysian crew members: State TV”, *Aljazeera*, 31 December 2019, <https://www.aljazeera.com/news/2019/12/31/iran-seizes-ship-arrests-16-malaysian-crew-members-state-tv>.

14 April 2020: The UK Maritime Trade Operations (UKMTO) reported that a Hong Kong-flagged oil tanker was boarded by armed men, sailed into Iranian waters, then released.⁹⁸

- On 15 April, the same organisation quoted British maritime security company Ambrey Intelligence as confirming that the attack was conducted by Iranian forces.⁹⁹
- *The Washington Post* speculated that the reason for the ship's swift release was the realisation by Iranian forces that this was a vessel from China, with which Tehran maintains very strong relations, rather than a Western vessel.¹⁰⁰

5 July 2020: The Dominica-flagged *MT Gulf Sky*, which was sought by the US for circumventing Iranian sanctions, had been hijacked, then taken to Iranian waters, where its crew and cargo were offloaded, with the Indian crew flying back to India.¹⁰¹

- Iran's involvement was later confirmed by the UN's International Labour Organization.¹⁰²

12 August 2020: US Central Command released footage of Iran seizing and then releasing Liberian tanker *MT Wila* near the Strait of Hormuz.¹⁰³

4 January 2021: Iran seized a South Korean tanker for "polluting the Persian Gulf with chemicals" according to an Iranian Foreign Ministry spokesman.¹⁰⁴ The *BBC* linked the attack to South Korean banks having frozen Iranian assets as part of US sanctions.¹⁰⁵

- Korea sent an anti-piracy unit to Hormuz in response.¹⁰⁶
- A US State Department official told *Reuters*, on condition of anonymity, that: "The (Iranian) regime continues to threaten navigational rights and freedoms in the Persian Gulf as part of a clear attempt to extort the international community into relieving the pressure of sanctions. We join the Republic of Korea's call for Iran to immediately release the tanker."¹⁰⁷

8.2 List of suspected Iranian attacks on tankers and infrastructure around the Gulf Peninsula

12 May 2019: Four commercial ships were damaged off the port of Fujairah in the Gulf of Oman in a suspected Iranian limpet mine attack. Two were Saudi, one Norwegian and the other from the UAE.¹⁰⁸

⁹⁸ "Armed Men Board Vessel in Gulf of Oman", *Marine Link*, 14 April 2020, <https://www.marinelink.com/news/armed-men-board-vessel-gulf-oman-477575>.

⁹⁹ Jonathan Saul, "Iran Briefly Detained Hong Kong-Flagged Ship", *Marine Link*, 15 April 2020, <https://www.marinelink.com/news/iran-briefly-detained-hong-kong-flagged-477619>.

¹⁰⁰ "Armed men seize, release tanker off Iran", *The Washington Post*, 14 April 2020, https://www.washingtonpost.com/national/world-digest-april-14-2020/2020/04/14/1fb3cb0c-7e59-11ea-a3ee-13e1ae0a3571_story.html.

¹⁰¹ Jon Gambrell, "Tanker off UAE sought by US over Iran sanctions 'hijacked'", *AP News*, 16 July 2020, <https://apnews.com/article/8c0317d66db96b8c4487b7eaff91354a>.

¹⁰² "UN agency: US-sought tanker 'hijacked' off UAE now in Iran", *Aljazeera*, 19 July 2020, <https://www.aljazeera.com/news/2020/7/19/un-agency-us-sought-tanker-hijacked-off-uae-now-in-iran>.

¹⁰³ U.S. Central Command (@CENTCOM), *Twitter*, 12 August 2020, 11.38p.m., <https://twitter.com/centcom/status/1293678243552395264?lang=en>.

¹⁰⁴ Parisa Hafezi and Hyonhee Shin, "South Korean-flagged tanker seized by Iran, Seoul demands release", *Reuters*, 4 January 2021, <https://www.reuters.com/article/iran-tanker-int-idUSKBN299188>.

¹⁰⁵ "South Korea to send delegation after Iran seizes tanker", *BBC News*, 5 January 2021, <https://www.bbc.co.uk/news/world-asia-55540507>.

¹⁰⁶ *Ibid.*

¹⁰⁷ "U.S. calls for Iran to release South Korean-flagged tanker", *Reuters*, 4 January 2021, <https://www.reuters.com/article/us-iran-tanker-usa-idUSKBN2992AJ>.

¹⁰⁸ "US 'blames Iran' for damage to tankers in Gulf of Oman", *BBC News*, 14 May 2019, <https://www.bbc.co.uk/news/world-middle-east-48264499>.

- US Director of Joint Staff Admiral Gilday blamed Iran for the attacks, telling a Department of Defense briefing on 24 May: “we believe with a high degree of confidence that this stems back to the leadership of Iran at the highest levels.”¹⁰⁹
 - The US responded by sending 1500 extra troops to the Middle East,¹¹⁰ as well as approving an emergency sale of arms to Saudi Arabia, which then Secretary of State Mike Pompeo said “must occur as quickly as possible in order to deter further Iranian adventurism in the Gulf and throughout the Middle East.”¹¹¹
 - On 19 May, in an interview with *Fox News*, President Trump said: “Right now, I don’t think Iran wants to fight. And I certainly don’t think they want to fight with us... But they cannot have nuclear weapons. They can’t have nuclear weapons. And they understand that.”¹¹²
- A joint UAE-Norwegian-Saudi report said that the attack was most likely carried out by a “state actor”.¹¹³

13 June 2019: Two tankers were damaged by explosions in a suspected Iranian limpet mine attack in the Gulf of Oman. One was Panamanian-flagged, the other flagged from the Marshall Islands.¹¹⁴

- US Secretary of State Pompeo told a press briefing that Iran was to blame for the attack, based on the “intelligence, the weapons used, the level of expertise needed to execute the operation, recent similar Iranian attacks on shipping, and the fact that no proxy group operating in the area has the resources and proficiency to act with such a high degree of sophistication”.¹¹⁵
 - US Central Command corroborated this with a statement and video showing Iranian special forces removing an unexploded mine from one of the ships.¹¹⁶
- On 14 June, The UK Foreign Office also blamed Iran for the attack, and Foreign Secretary Jeremy Hunt called for Iran to “urgently cease all forms of destabilising activity”.¹¹⁷

14 December 2020: Singapore-flagged tanker *MT Wila* was hit by an “external explosion” caused by an explosives-laden boat at the Saudi port of Jeddah.¹¹⁸ Saudi officials blamed Houthi terrorists.¹¹⁹

¹⁰⁹ Katie Wheelbarger and Michael Gilday, “Department of Defense Briefing on Iran”, U.S. Dept of Defense, 24 May 2019, <https://www.defense.gov/Newsroom/Transcripts/Transcript/Article/1857948/department-of-defense-briefing-on-iran/>.

¹¹⁰ “White House OK’s 1,500 troops to Mideast, moves to push through Saudi arms sales”, *CBC*, 24 May 2019, <https://www.cbc.ca/news/world/us-troops-middle-east-1.5148606?fbclid=IwAR1gYpDw88NHvFaK6vljKcR18AMZSeq2u5YpZISctCcLUaNmBp-6sOMUB9A>.

¹¹¹ “Arms Sales Notification”, *Federal Register*, 24 July 2019, <https://www.federalregister.gov/documents/2019/07/24/2019-15755/arms-sales-notification>.

¹¹² *Fox News*, “Interview: Steve Hilton Interviews Donald Trump”, *YouTube* video, 36:44, posted by *Fox News*, 20 May 2019, https://www.youtube.com/watch?v=H9ys30khGM8&ab_channel=FactbaseVideos.

¹¹³ “Letter dated 17 June 2019 from the Permanent Representatives of Norway, Saudi Arabia and the United Arab Emirates to the United Nations addressed to the President of the Security Council”, UNSC, 18 June 2019, <https://undocs.org/pdf?symbol=en/S/2019/502>.

¹¹⁴ “Gulf of Oman tanker attacks: What we know”, *BBC News*, 18 June 2019, <https://www.bbc.co.uk/news/world-middle-east-48627014>.

¹¹⁵ “Secretary of State Michael R. Pompeo Remarks to the Press”, U.S. Department of State, 13 June 2019, <https://2017-2021.state.gov/secretary-of-state-michael-r-pompeo-remarks-to-the-press/index.html>.

¹¹⁶ “U.S. Central Command Statement on June 13 Limpet Mine Attack in the Gulf of Oman”, U.S. Central Command, 13 June 2019, https://www.centcom.mil/MEDIA/STATEMENTS/Statements-View/Article/1875666/us-central-command-statement-on-june-13-limpet-mine-attack-in-the-gulf-of-oman/utm_source/hootsuite/.

¹¹⁷ “Gulf of Oman attacks: UK statement”, Foreign & Commonwealth Office, 14 June 2019, <https://www.gov.uk/government/news/gulf-of-oman-attacks-uk-statement>.

¹¹⁸ Florence Tan, “‘External source’ Causes Explosion, Fire on Oil Tanker in Saudi Arabia”, *Marine Link*, 14 December 2020, <https://www.marinelink.com/news/external-source-causes-explosion-fire-oil-483857>.

¹¹⁹ “‘Terrorist attack’ strikes oil tanker at Saudi port in Jeddah”, *Aljazeera*, 14 December 2020, <https://www.aljazeera.com/news/2020/12/14/external-source-causes-oil-tanker-blast-off-saudi-arabia>.

26 February 2021: UKMTO reported that an Israeli-owned ship had been hit by missiles in the Gulf of Oman.¹²⁰

- On 28 February, Israeli defence minister Benny Gantz said that he thought that Iran was behind the explosion: “Iran is looking to hit Israeli infrastructure and Israeli citizens,” Gantz told the public broadcaster *Kan*. “The location of the ship in relatively close proximity to Iran raises the notion, the assessment, that it is the Iranians.”¹²¹

3 March 2021: Israel accused Iran of “environmental terrorism” after an Iranian ship turned off its navigation systems, entered Israeli waters, and spilled oil into the sea.¹²²

25 March 2021: An Israeli cargo ship was hit by a missile in the Arabian Sea in a suspected Iranian attack.¹²³

14 April 2021: Israeli-owned vessel *Hyperion Ray* was attacked and “lightly damaged” in Gulf waters off the UAE by a missile strike. Israeli sources blamed Iran.¹²⁴

27 April 2021: The US coastguard reported that IRGC boats had harassed two of its ships in the Persian Gulf on 2 April.¹²⁵

¹²⁰ Lisa Barrington, “Vehicle Carrier Ship Hit by Explosion in Gulf of Oman”, *Marine Link*, 26 February 2021, <https://www.marinelink.com/news/vehicle-carrier-ship-hit-explosion-gulf-485602>.

¹²¹ Maayan Lubell, “Israel says initial assessment is Iran behind explosion on Israeli-owned ship”, *Reuters*, 27 February 2021, <https://www.reuters.com/article/us-gulf-security-ship-idUSKCN2AROLC>.

¹²² Rami Ayyub and Ari Rabinovitch, “Israel Says It Tracked Down the Ship Linked to Recent Oil Spill”, *Marine Link*, 3 March 2021, <https://www.marinelink.com/news/israel-says-tracked-down-ship-linked-485727>.

¹²³ “Israeli-owned Cargo Ship Hit by Missile in Arabian Sea”, *Marine Link*, 25 March 2021, <https://www.marinelink.com/news/israeliowned-cargo-ship-hit-missile-486342>.

¹²⁴ “Vessel owned by Israeli company attacked off UAE coast: Reports”, *Aljazeera*, 14 April 2021, <https://www.aljazeera.com/news/2021/4/14/vessel-owned-by-israeli-company-attacked-off-uae-coast-reports>.

¹²⁵ “Iranian Ships, U.S. Coast Guard Vessels Meet In Tense Gulf Encounter”, *Radio Liberty*, 27 April 2021, <https://www.rferl.org/a/iran-us-ships-tense-encounter-persian-gulf/31224892.html>.

Chapter 9: Unlawful Detention of British Nationals

There are currently at least five British and dual-British citizens being unlawfully detained in Iran. While many of these charges are fabricated or without legitimate justification, the conditions in which Iran holds detainees, and the wider associated human rights abuses under the Iranian regime, leaves this as a particular source of contention for UK national interests. As of 9 May 2021, the FCDO advised dual-British-Iranian citizens against all travel to Iran; and advised against all but essential travel for British citizens except for the Iraqi, Afghan, Pakistani and Turkmenistan borders.¹²⁶ The FCDO further advised that:

There is a risk that British nationals, and a significantly higher risk that British-Iranian dual nationals, could be arbitrarily detained or arrested in Iran. The criminal justice process followed in such cases falls below international standards. Iran does not recognise dual nationality. If you are a dual British-Iranian national and are detained in Iran, the FCDO's ability to provide consular support is extremely limited.¹²⁷

The FCDO's travel advice for British and especially for dual-British-Iranian citizens is stark. This level of travel advice is usually reserved for either failed states with no functioning government (e.g. Somalia),¹²⁸ or for a country with which the UK is at war. This level of advice reflects the risks and threats posed to British and dual-British-Iranian citizens by the Islamic Republic regime, which has maintained an active state policy of hostage taking to further its political ends since its inception.

9.1.1 List of known British citizens/permanent residents/dual nationals, who were in Iranian detention during President Rouhani's premiership, now released

The Center for Human Rights in Iran¹²⁹ claims that there are likely to be more foreign and dual nationals currently and previously imprisoned in Iran, but the details of these have not been publicly released.¹³⁰ The data set for this goes back to British and dual-British nationals who have been under Iranian detention during President Rouhani's premiership, which began in August 2013. This marked the start of nuclear negotiations prior to the JCPOA.

October 2013 – Roya Nobakht¹³¹

A British-Iranian dual national, Roya Nobakht was imprisoned during a family visit to Iran for publishing Facebook posts criticising the Iranian regime. Held for approximately 1424 days, she was submitted to physical and mental torture, while denied access to medication. She was released on 25 August 2017 after serving her sentence, though is still subject to a two-year travel ban.

20 June 2014 – Ghoncheh Ghavami¹³²

British-Iranian dual national Ghoncheh Ghavami was charged for "spreading propaganda against the political system". Sentenced to one year in jail after joining a peaceful protest

¹²⁶ "Foreign travel advice: Iran", Gov.UK, <https://www.gov.uk/foreign-travel-advice/iran>.

¹²⁷ Ibid.

¹²⁸ "Foreign travel advice: Somalia", Gov.UK, <https://www.gov.uk/foreign-travel-advice/somalia>.

¹²⁹ The Center for Human Rights in Iran is a US-based non-government organisation that aims to promote human rights in Iran. Its website can be found at <https://iranhumanrights.org/>.

¹³⁰ "Who Are the Dual and Foreign Nationals Imprisoned in Iran?", *Center for Human Rights in Iran*, 24 May 2018 (updated 26 April 2021), <https://www.iranhumanrights.org/2018/05/who-are-the-dual-nationals-imprisoned-in-iran/>.

¹³¹ "Iran urged to free imprisoned British citizens on humanitarian grounds", *Independent*, 20 January 2016, <https://www.independent.co.uk/news/uk/home-news/tehran-urged-free-imprisoned-british-citizens-humanitarian-grounds-a6824071.html>.

¹³² "Ghoncheh Ghavami, in prison in Iran for wanting to watch volleyball", *Amnesty International*, 3 November 2014, <https://www.amnesty.org.uk/ghoncheh-ghavami-prison-iran-volleyball-protest>.

against a ban on women attending volleyball matches, she was held for 156 days before being released on bail on 23 November 2014 after serving half her sentence.

4 February 2016 – Bahman Daroshafaei¹³³

A British-Iranian former BBC Persian journalist, Bahman Daroshafaei worked as a translator. No charge was formally made. He was held for 20 days.

15 April 2018 – Abbas Edalat¹³⁴

British-Iranian academic and anti-war activist Abbas Edalat was attending an academic conference before being detained on accusations of espionage for the UK Government. He was held for approximately 230 days. Having been released in December 2018, he wrote to *The Guardian* stating that he received no assistance from the Foreign and Commonwealth Office, and that they were only notified of his release when he returned to work in the UK.¹³⁵

September 2018 – Kylie Moore-Gilbert¹³⁶

A British-Australian academic, she was sentenced to ten years' imprisonment on charges of spying for Israel. She was held for approximately 810 days before being released in a prisoner swap on 26 November 2020, after the Australian Government negotiated the release of three Iranian prisoners who were involved in a botched bomb plot in Bangkok in 2012.¹³⁷

11 August 2019 – Kameel Ahmady¹³⁸

A British-Iranian academic who was sentenced to eight years in prison for “collaborating with a hostile government”. He was held for 585 days before being released on bail on 21 November 2019, and fleeing the country by escaping over the border.

July 2019 – Jolie King¹³⁹

British-Australian travel blogger, arrested on espionage charges after flying a camera drone. Held for approximately 90 days, then released on 5 October 2019 after “sensitive negotiations” between the Iranian and Australian Governments.¹⁴⁰

9.1.2 Full list of dual-British and British residents still currently under Iranian detention

The following British and dual-British citizens and permanent British residents are all currently under Iranian detention.

6 April 2016 – Nazanin Zaghari-Ratcliffe¹⁴¹

British-Iranian charity worker Nazanin Zaghari-Ratcliffe was sentenced to five years' imprisonment for plotting to overthrow the Iranian Government. In a telephone call to British

¹³³ Sanne Wass, “Ex-BBC Journalist Bahman Daroshafaei Released on Bail”, *Journalism is Not a Crime*, 23 February 2016, <https://journalismisnotacrime.com/en/news/1071/>.

¹³⁴ “Iran Detains Another Iranian British Citizen, Computer Scientist and Antiwar Activist Abbas Edalat”, *Center for Human Rights in Iran*, 25 April 2018, <https://www.iranhumanrights.org/2018/04/iran-detains-another-iranian-british-citizen-computer-scientist-and-antiwar-activist-abbas-edalat/>.

¹³⁵ Prof. Abbas Edalat, “The Foreign Office did not have a hand in my release from Iran”, *The Guardian*, 31 December 2018, <https://www.theguardian.com/world/2018/dec/31/the-foreign-office-did-not-have-a-hand-in-my-release-from-iran>.

¹³⁶ Michael McGowan and Ben Doherty, “Kylie Moore-Gilbert says Australian government should have gone public with her case earlier”, *The Guardian*, 9 March 2021, <https://www.theguardian.com/world/2021/mar/09/kylie-moore-gilbert-says-iran-trying-to-recruit-her-as-a-spy-during-two-year-imprisonment>.

¹³⁷ “Kylie Moore-Gilbert has been released in exchange for three Iranian men – who are they?”, *ABC News*, 26 November 2020, <https://www.abc.net.au/news/2020-11-26/kylie-moore-gilbert-iran-prisoner-swap-what-we-know/12922198>.

¹³⁸ “Kameel Ahmady: British FGM academic ‘jailed in Iran’”, *BBC News*, 14 December 2020, <https://www.bbc.com/news/world-middle-east-55300694>.

¹³⁹ Josh Taylor and agencies, “Australian and British bloggers Jolie King and Mark Firkin released by Iran”, *The Guardian*, 5 October 2019, <https://www.theguardian.com/australia-news/2019/oct/05/australian-and-british-bloggers-jolie-king-and-mark-firkin-released-in-iran>.

¹⁴⁰ *Ibid.*

¹⁴¹ “Iran: British-Iranian charity worker detained: Nazanin Zaghari Ratcliffe”, *Amnesty International*, 20 May 2016, <https://www.amnesty.org/en/documents/mde13/4068/2016/en/>.

Prime Minister Boris Johnson, Iranian President Hassan Rouhani explicitly linked Zaghari-Ratcliffe's sentence to a £400 million debt owed by Britain over an arms deal before the 1979 revolution.¹⁴² She has been frequently subjected to mental and physical torture. Held for 1799 days, she was released on 7 March 2021 – but now faces new charges of propaganda and remains in detention in Iran.¹⁴³

13 August 2017 – Anoush Ashoori¹⁴⁴

This British-Iranian businessman was convicted of spying for Israeli intelligence service Mossad and sentenced to 12 years' imprisonment. His son linked the arrest to sanctions and the UK's £400 million unpaid debt.¹⁴⁵ Held for 1312 days and counting.

24 January 2018 – Morad Tahbaz¹⁴⁶

British-American-Iranian charity worker, detained on charges of spying for the US and sentenced to ten years' imprisonment. Held for 1148 days and counting.

March 2018 – Aras Amiri¹⁴⁷

An Iranian citizen and UK resident, she was visiting her grandparents in Iran. Jailed for ten years for espionage, she has been held for approximately 1100 days and counting.

October 2020 – Mehran Raoof¹⁴⁸

British-Iranian workers' rights activist who was secretly recorded discussing workers' rights in a café. Held for approximately 150 days and counting.

The Iranian Government's continued policy of hostage taking, particularly Western and British citizens, often serves further Iranian political ends. This is demonstrated by President Rouhani's insistence that Nazanin Zaghari-Ratcliffe's detention in Iran is explicitly linked to a decades-old £400 million British debt owed to Iran,¹⁴⁹ and the perceived link to other British nationals also currently under duress. This state-sanctioned policy of hostage taking is such a serious threat to British interests that the FCDO must establish more effective diplomatic mechanisms to deal with the abduction of British citizens by the Iranian authorities. Sharing similar concerns regarding the safety of their citizens, US courts have recently enacted legislation that aims to enhance the protection for US citizens held in detention by Iran.

9.2 US model of negotiating for unlawfully detained citizens

Prior to the Trump administration, the US had a policy of non-negotiation with hostage takers, due to a belief that this would only encourage more to be taken.¹⁵⁰ Despite that, behind-the-

¹⁴² "Nazanin Zaghari-Ratcliffe in Tehran court on new charge", *BBC News*, 14 March 2021, <https://www.bbc.co.uk/news/uk-56390394>.

¹⁴³ Ibid.

¹⁴⁴ Borzou Daragahi, "Anoosheh Ashoori: Iran jails British national for 10 years on spying charges", *Independent*, 27 August 2019, <https://www.independent.co.uk/news/world/middle-east/anoosheh-ashoori-iran-spy-british-council-jail-prison-sentence-a9080041.html#r3z-addoor>.

¹⁴⁵ Anu Shukla, "Son of jailed British-Iranian: 'My dad's never been political'", *Aljazeera*, 1 October 2019, <https://www.aljazeera.com/news/2019/10/1/son-of-jailed-british-iranian-my-dads-never-been-political>.

¹⁴⁶ "Environmentalists Detained in Crackdown Denied Legal Counsel Amid Claims Some Were 'Jewish Spies'", *Center for Human Rights in Iran*, 5 March 2018, <https://www.iranhumanrights.org/2018/03/environmentalists-detained-in-crackdown-denied-legal-counsel-amid-claims-some-were-jewish-spies/>.

¹⁴⁷ "Aras Amiri: British Council worker jailed in Iran a 'bargaining chip'", *BBC News*, 21 August 2019, <https://www.bbc.co.uk/news/uk-49422412>.

¹⁴⁸ David G. Rose, "British-Iranian man in solitary confinement in notorious Iran prison 'after discussing politics in a coffee shop'", *The Telegraph*, 20 March 2020, <https://www.telegraph.co.uk/news/2021/03/20/british-iranian-man-solitary-confinement-notorious-iran-prison/>.

¹⁴⁹ "Nazanin Zaghari-Ratcliffe in Tehran court on new charge", *BBC News*.

¹⁵⁰ Joel Simon, "How Trump has reversed decades of American hostage policy", *The New Yorker*, 7 February 2020, <https://www.newyorker.com/news/news-desk/how-trump-has-reversed-decades-of-american-hostage-policy>.

scenes negotiations did take place. President Obama negotiated the release of five hostages in 2016 as “a one-time gesture”.¹⁵¹ In return, the US agreed to free from jail or drop charges against seven Iranians in the US and 14 abroad charged with violating a trade embargo against Iran. The next day, the US also announced that it would release US\$1.7 billion dollars to Iran in an allegedly separate arms sales dispute.¹⁵² However, this deal failed to include any reference to the missing US citizen Robert Levinson, and did not include the release of jailed Iranian-American businessman Siamak Namazi.

Due to the limited success of that negotiation, on 15 June 2020 the US passed The Robert Levinson Hostage Recovery and Hostage-Taking Accountability Act.¹⁵³ This facilitated the creation of:

- A Special Presidential Envoy on Hostage-Taking Affairs
 - “The envoy’s duties shall include leading diplomatic engagement on US hostage policy and coordinating diplomatic engagements in support of hostage recovery efforts.”
- An “interagency Hostage Recovery Fusion Cell, to assess and track all hostage cases of U.S. nationals and coordinate agency efforts to safely recover hostages.”
- The Hostage Recovery Group, “which shall make recommendations regarding hostage recovery options and coordinate the development and implementation of U.S. hostage recovery policies.” It also authorised the President to “impose visa and property-blocking sanctions against any foreign person responsible for or complicit in the unlawful or wrongful detention of a U.S. national abroad.”

The UK Government has not been credited with securing the release of any of its citizens/permanent residents detained by Iran. The UK does not maintain anything equivalent to the US federal bodies, or have legislation equivalent to the Robert Levinson Hostage Recovery and Hostage-Taking Accountability Act. As such, the UK Government struggles to deal with Iran when attempting to secure the release of British nationals under detention.

This can be evidenced by the lack of direct engagement between London and Tehran on such matters, compared with the above-listed US federal bodies. The release of UK nationals was either due to their sentences being served, or from the Australian Government securing the release of dual nationals Kylie Moore-Gilbert and Jolie King.¹⁵⁴

In the US cases, a number of detainees were released due to government efforts:

- Jason Rezaian, Amir Hekmati, Saeed Abedini, Nosratollah Khosravi and Matthew Trevithick were freed as part of the Obama administration’s hostage swap and subsequent repayment of an arms debt owed to Iran.¹⁵⁵
- Xiyue Wang was released after the Trump administration agreed to a prisoner swap with Iranian scientist Masood Soleimani.¹⁵⁶

¹⁵¹ Yeganeh Torbati and Joel Schectman, “America’s unending hostage crisis with Iran”, *Reuters*, 1 August 2018, <https://www.reuters.com/investigates/special-report/usa-iran-student/>.

¹⁵² Ibid.

¹⁵³ “S.712 – Robert Levinson Hostage Recovery and Hostage-Taking Accountability Act”, Congress.Gov, 15 June 2020, <https://www.congress.gov/bill/116th-congress/senate-bill/712>.

¹⁵⁴ Taylor, “Australian and British bloggers Jolie King and Mark Firkin released by Iran”. See also “Kylie Moore-Gilbert has been released”, *ABC News*.

¹⁵⁵ Torbati and Schectman, “America’s unending hostage crisis with Iran”.

¹⁵⁶ Eliza Mackintosh, Maija-Liisa Ehlinger and Jennifer Hansler, “American student held prisoner since 2016 released in US-Iran prisoner swap”, *CNN*, 7 December 2019, <https://edition.cnn.com/2019/12/07/politics/xiyue-wang-released-iran-prisoner-swap-intl/index.html>.

- Michael White's release came alongside the US's release of an Iranian doctor and scientist accused of breaking sanctions and espionage.¹⁵⁷

This US diplomatic model for dealing with citizens detained by Tehran, and the federal legislation recently enacted to strengthen this model, should serve as a template for how the UK can better protect citizens who, despite the stark FCDO advice, still travel to Iran.

¹⁵⁷ "Iranian scientist acquitted of stealing research deported by US", *BBC News*, 2 June 2020, <https://www.bbc.co.uk/news/world-middle-east-52876019>.

PART THREE: DEVELOPING UK POLICY

Chapter 10: The Future of UK Engagement with Iran

From the data collected and evidence presented it is clear that Iran continues to pose significant risks to the UK's economic and national security interests across the Gulf Peninsula. In addition, current mechanisms put in place through multilateral organisations are simply ineffective. The UK's regional allies, including the US, Saudi Arabia, Israel and the UAE, are all facing increased threats to their national security from Iranian transgressions. Any meaningful engagement with Iran from the UK Government must take these regional allies' considerations forwards. This will provide for a broader consensus, and more robust security dialogue, in order to meet regional security requirements.

Based on the evidence presented in this report, listed below are a sequence of measures which the UK Government should endeavour to incorporate into its future engagement with Iran, in order to better protect the UK's national security interests. The 2021 Integrated Review calls for a broader nuclear and regional deal, and the policy recommendations listed below aim to satisfy this requirement.

Policy recommendations

10.1 The JCPOA

As demonstrated throughout this paper, the Iranian regime has broken the nuclear terms of the JCPOA (particularly following the US withdrawal from the agreement). Iran has demonstrably felt uncompelled by the largely ineffective 'snap-back' sanctions to enforce compliance with the JCPOA and UNSC Resolution 2231. Reviewing a tough sanctions regime and the JCPOA's 'snap-back' sanctions is one way to readdress continued noncompliance.

10.1.1 Targeted sanctions regime

One area for consideration for the UK Government regarding stricter Iranian sanctions, as part of any renewed effort for the JCPOA, would be a more efficient targeting of the Middle East banking system which facilitates Iranian-controlled regional terrorism. In particular, the ties between certain Iranian and Lebanese banks which directly facilitate the passage of IRGC money to regional terrorist organisations should be actively targeted.

The evidence collected in the annexes demonstrates that various regional security forces – ranging from Ukraine, to Turkey, to the US Navy – discovered Iranian shipments of missiles and weapons to regional terrorist organisations on at least eight separate occasions between the JCPOA's implementation in January 2016 and the US announcement of its withdrawal in May 2018. This was in direct breach of UNSC Resolution 2231, and the Yemen arms embargo. Iranian noncompliance with UNSC Resolution 2231 was underscored as early as June 2016 – fewer than six months after the JCPOA's implementation – when the Secretary-General of Hezbollah stated that the terrorist organisation's budget, its salaries, expenses, weapons and missiles, all originated from Iran. This is in direct violation of UNSC Resolution 2231.¹⁵⁸ In attempting to disrupt and deny regional terrorist organisations' access to Iranian finance, the

¹⁵⁸ "Second report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)", United Nations Security Council, 30 December 2016, <https://www.undocs.org/S/2016/1136>.

UK Government should open an inquiry examining the role of the British banking industry and its ties with certain Lebanese banks.

Looking at the issue more broadly, it is worth recalling the UK Government's assertion in the 2015 SDSR that: "If at any time Iran fails to meet its commitments under the Joint Comprehensive Plan of Action, international sanctions will be re-imposed."¹⁵⁹ Despite this statement, made at the outset of the JCPOA, the UK at various times chose not to pursue the path of reinstating sanctions against Iran despite multiple verified breaches of the deal. The UK must reconsider this hesitation and reintroduce sanctions in order to curb Iranian noncompliance. As demonstrated by the US Treasury sanctions and subsequent reports, the sanctions regime placed on Iran, while not curbing nuclear noncompliance, has seriously affected the IRGC's ability to finance regional terrorist organisations which harm both the UK's national interests in the Arabian Peninsula, and those of its allies. Used in conjunction with targeted sanctions on both Iranian and Lebanese banking entities which facilitate the IRGC, this becomes a wholly appropriate consideration for the UK Government to endorse. However, sanctions should only present themselves as a temporary solution to the ongoing problem until a comprehensive agreement can be made by Iran and the members of the JCPOA.

10.1.2 The JCPOA's sunset clauses

One of the most contentious issues of the JCPOA requiring urgent reassessment is that it was limited in its focus on nuclear proliferation, and was not adequately supported by UNSC Resolution 2231 to maintain control over broader security threats posed by the Iranian regime. This is exemplified by Paragraph 6b of Resolution 2231, which permitted arms embargoes on Iran to be lifted by October 2020:

[All states will] take the necessary measures to prevent, except as decided otherwise by the UN Security Council in advance on a case-by-case basis, the supply, sale, or transfer of arms or related material from Iran by their nationals or using their flag vessels or aircraft, and whether or not originating in the territory of Iran, until the date five years after the JCPOA Adoption Day or until the date on which the IAEA submits a report confirming the Broader Conclusion, whichever is earlier.¹⁶⁰

This meant that, as of 18 October 2020, Iran was no longer bound by the arms control agreement which was in place under UNSC Resolution 2231. This report has seen evidence of continued, and in places increasing, Iranian weapons proliferation to regional terrorist organisations which seek to harm both the UK's interests, and those of regional allies. The UK's position, should it return to the JCPOA, should be to advocate for the reinstatement of a more permanent Iranian arms embargo, not one which lasts for only five years and in which there are few if any consequences for continued Iranian breaches under the existing JCPOA. Further sunset clauses which must be addressed under the existing deal include the centrifuge restrictions which will be lifted by January 2026, in addition to the limits on the amount of low-enriched uranium that Iran can possess, due to expire five years later.

10.1.3 Inclusion of regional allies in a future JCPOA

Should renegotiations for the JCPOA continue to go ahead under the new Iranian administration, then Israel, Saudi Arabia, and the UAE should all be consulted by the P5+1. As evidenced in this report, these three states suffer enormously from Iran's continued belligerence and noncompliance under its terms of the JCPOA and the UNSC Resolution 2231.

¹⁵⁹ "National Security Strategy and Strategic Defence and Security Review 2015", p.62.

¹⁶⁰ "Resolution 2231", United Nations Security Council.

Their exclusion from negotiations of the JCPA (Joint Plan of Action) and JCPOA from 2013 onwards was a lost opportunity to strengthen regional legitimacy for the JCPOA. It reflected a failure to consider the security concerns of the UK's allies in the region. This cannot be repeated in any future renegotiation of the deal.

10.2 UK maritime presence in the Arabian Gulf

In the wake of repeated attacks against international shipping across the Arabian Peninsula in the summer of 2019, and after the illegal IRGC seizure of the *Stena Impero*, the IMSC was established by member nations to protect shipping across the region.¹⁶¹ The IMSC implements its mandate through its operational arm, Coalition Task Force SENTINEL, which conducts security patrols across the Persian Gulf, Gulf of Oman, Gulf of Aden, and the Southern Red Sea. Stationed in Bahrain, with the headquarters hosted at the US Naval Support Activity, the IMSC works with international partners, industry representatives and stakeholders, and with its own members, to provide security in these heavily contested waters. The IMSC secures most of its remit and thus legitimacy by virtue of its membership-based alliance, providing security for individual members.

Despite the welcome presence of the IMSC, to which the UK and the Royal Navy maintain a major contributing role, often providing the command element to Task Force SENTINEL, Iran continues to destabilise the maritime environment across the region, often resulting in harm to the UK's interests. This report has uncovered at least eight separate occasions when regional security forces have uncovered Iranian lethal aid shipments transiting the sea to Yemen, in breach of the UNSC Resolution 2231. Three of these have occurred since the establishment of the IMSC in September 2019. Despite the creation of this construct, Iranian lethal aid is still transiting the seas to the Houthis, who use it to orchestrate lethal attacks on Saudi Arabia and the UAE, harming UK interests.

Bahrain, the UK, the US, and the UAE are all members of the IMSC. It can be strongly evidenced from the data collected in this report that the security of each of these members – half of the IMSC's membership – is coming under increasing threat from the malign regional behaviour of Iran, and of the IRGC in particular. Here, the IMSC could play a much more active role in securing the security interests of these four members. In particular, the IMSC should counteract the illegal Iranian smuggling of cruise and ballistic missiles across the sea to Yemen, which are then used by the Houthis to target Saudi Arabia. Counter-smuggling certainly falls within the IMSC's remit, and greater consideration should be given to strengthening this capability by what will soon be a much-invigorated Royal Navy.

In particular, the UK Government should consider making the 'permanent deployment' of a Type 23 frigate to OP KIPION, based in Bahrain, actually permanent. *HMS Montrose*, currently on permanent deployment, is set to be retired early and decommissioned in 2022. Having been involved in maintaining security in the crucial Strait of Hormuz and participated in significant drugs seizures in the region, the decommissioning of *HMS Montrose* will be a deep loss to the UK's ability to provide security for its national interests.

The Government should also consider not just extending and making permanent a basing right for a Type 23 frigate, but also the addition to the IMSC of Royal Navy assets which will increase security in the light of Iran's increasingly destabilising actions. This should include the ability to counter Iran's increasingly sophisticated UAV drone technology. This report has highlighted threats against Saudi Arabia and the UAE, and the UK's interests in these countries.

¹⁶¹ International Maritime Security Construct, <https://www.imscsentinel.com/>.

In particular, Saudi Arabia's vast oil infrastructure is increasingly coming under attack from UAV drones – the likes of which Saudi air defences are struggling to mitigate against.

The addition of Royal Navy mine sweepers can provide security against the Iranian attacks on international shipping across the region, often caused by mines. Furthermore, the rapid naval patrol vessels, which can act swiftly enough to interdict illegal Iranian ship seizures by IRGC craft, which are too nimble for large destroyers and frigates, will enhance security in the region. The actual permanent deployment of a Royal Navy frigate on OP KIPION, in addition to a mine sweeper and more rapid patrol vessels to interdict illegal Iranian maritime activity, will all aid the remit of the IMSC.

The desirability for the IMSC's contributing members to play a more active role was a view echoed by Royal Navy Commodore Fryer, the current Task Force SENTINEL commander, in comments provided for this research. The Commodore also stated that “we believe that greater international participation will result in greater deterrence of activity that undermines the rules-based international system”.¹⁶² The IMSC's potential broadening to include further international members who can contribute to security across the Arabian Peninsula must be supported and indeed championed by the UK Government.

¹⁶² Commodore Fryer, Royal Navy, Task Force SENTINEL Commander, in a written interview to the author. Held by *The Henry Jackson Society*. Received on 14 April 2021.

Conclusion

In essence, the mechanisms within the JCPOA and Resolution 2231 do little to dissuade Iran from continual breaches, and the sanctions relief that followed in 2016 has only emboldened the regime and enriched the IRGC, which continues to destabilise the region and threaten the interests of the UK and its allies.

Annex A: JCPOA Violations	Annex B: ICBM Programme - Tests and unveilings	Annex C: Houthi missile attacks on Saudi Arabia	Annex D: Houthi drone attacks on Saudi Arabia	Annex E: Iraqi militia attacks on Coalition forces	Annex F: UNSC Resolution 2231 Arms violations
2016: 3	2016: 4	2015: 4	2015: 0	2015: 0	2015: 0
2017: 0	2017: 3	2016: 15	2016: 0	2016: 0	2016: 6
2018: 0	2018: 7	2017: 9	2017: 0	2017: 1	2017: 8
2019: 11	2019: 7	2018: 24	2018: 2	2018: 2	2018: 25
2020: 13	2020: 7	2019: 5	2019: 13	2019: 15	2019: 10
2021: 6	2021: 4	2020: 15	2020: 11	2020: 22	2020: 5
		2021: 8	2021: 28	2021: 12	2021: 0

As demonstrated by the data within the annexes, Iran's presence as a destabilising force in the Middle East is constant and, in some cases, accelerating. Most notably, despite the reimposition of sanctions in 2018 by the US which has constrained Iran's economy, the regime has continued to develop and test its ICBMs and maintains financial, technical and material support for Houthi and Iraqi militia forces. In addition, Iran's nuclear programme has continued to escalate, with breaches of the JCPOA increasing year on year since 2019.

Consequently, for the regional situation to improve, a new comprehensive agreement that looks to incorporate broader security issues – such as ICBM programmes, illicit financing of proxy groups, and arms violations – alongside the central issue of nuclear proliferation, must be prioritised by the P5+1, the Iranian regime and their regional neighbours.

The UK Government must seize the opportunity provided by the recent Integrated Review to re-evaluate its current policy engagement with Iran, in a manner which best preserves and enhances its national security interests across the Arabian Gulf. Crucially, this involves working more closely with regional allies, including Saudi Arabia and Israel, who face the brunt of security threats from Iranian aggression which the JCPOA and Resolution 2231 do little to preclude. The UK must remain resolute, and engage with regional partners, allies and stakeholders in pursuing the “more comprehensive nuclear and regional deal” that it committed to within the Integrated Review.

It has been demonstrated that economic sanctions instituted by the US after 2018 severely restricted the Iranian defence budget, and therefore the capability of the IRGC. This must be urgently acted upon by the UK Government in the light of the increasing attacks on Coalition forces in Iraq by the IRGC-controlled PMF. Coupled with this diplomatic approach to a targeted Iranian sanctions regime, the UK must increase where necessary the Royal Navy commitment to the IMSC.

This modest yet necessary addition to defence capability will increase the UK's security in light of continued Iranian aggression in the maritime domain, and continued threats to international shipping across the Gulf.

The limited but robust policies put forth in this report, which highlights continued Iranian nuclear noncompliance and aggression across the Arabian Gulf, will have a demonstrably positive impact upon the UK's national security interests across the wider Middle East, and those of its allies.

Annex A: Full list of Iranian violations of the JCPOA

● 2016 – 3 INCIDENTS

16 January: Resolution 2231 – the UN resolution supporting the JCPOA and removing several of the UN’s sanctions on Iran – came into effect.¹⁶³

26 February: The IAEA quarterly report noted that Iran had 130.9 metric tons of heavy water on 17 February. This was above the 130 metric ton limit set out in Annex 1, Paragraph C.14 of the JCPOA. Iran reduced by 20 metric tons on 24 February to get back below the limit.¹⁶⁴

8 November: The IAEA confirmed that Iran’s heavy water stock, at 130.1 tons, exceeded the 130 metric ton limit outlined in Annex 1, C. 14 of the JCPOA for the second time.¹⁶⁵

- The US State Department stated that, “It’s important to note that Iran made no effort to hide this.”¹⁶⁶

● 2019 – 11 INCIDENTS

8 May: Iranian officials announced that Iran would no longer be bound by stockpile limitations on enriched uranium and heavy water reserves, in breach of Paragraph A.7 of the JCPOA. They also threatened to restart construction of the heavy water reactor at Arak and resume higher level enrichment in the future.¹⁶⁷

- Then UK Foreign Office Minister Mark Field urged Iran to “not take any further escalatory steps and stand by its commitments” but ruled out re-imposing sanctions at this stage.¹⁶⁸
- US responded with fresh sanctions on Iran’s copper, aluminium, steel and iron sectors.¹⁶⁹

1 July: Iranian officials announced that it breached the 300 kg limit on uranium gas enriched to 3.67% set out in Paragraph A.7 of the JCPOA. The IAEA confirmed Iran exceeded the limit.¹⁷⁰

8 July: Iran notified the IAEA that it had enriched uranium to “about 4.5 percent” uranium-235 at the Natanz pilot fuel enrichment plant, in contravention of Paragraph A.5 of the JCPOA. This was confirmed by the IAEA.¹⁷¹

¹⁶³ “Resolution 2231 (2015) on Iran Nuclear Issue: Background”, United Nations Security Council, <https://www.un.org/securitycouncil/content/2231/background>.

¹⁶⁴ “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council Resolution 2231 (2015)”, International Atomic Energy Agency, 26 February 2016, <https://www.iaea.org/sites/default/files/gov-2016-8-derestricted.pdf>.

¹⁶⁵ “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)”, International Atomic Energy Agency, 9 November 2016, <https://www.iaea.org/sites/default/files/16/11/gov2016-55.pdf>.

¹⁶⁶ Francois Murphy, “Iran once again exceeds a nuclear deal limit: IAEA report”, *Reuters*, 9 November 2016, <https://www.reuters.com/article/us-iran-nuclear-idUSKBN1342T1>.

¹⁶⁷ Kelsey Davenport and Daryl G. Kimball, “Iran Announces Countermoves on Nuclear Deal”, Arms Control Association, 10 May 2019, <https://www.armscontrol.org/blog/2019-05-10/iran-announces-countermoves-nuclear-deal-p41-iran-nuclear-deal-alert>.

¹⁶⁸ Ciaran McGrath, “Iran warned of ‘consequences’ if it quits nuclear deal – ‘An unwelcome step’”, *Express*, 8 May 2019, <https://www.express.co.uk/news/world/1124416/iran-news-consequences-nuclear-deal-tehran-united-states>.

¹⁶⁹ “Iran-US tensions escalate as Trump imposes new sanctions”, *Aljazeera*, 8 May 2019, <https://www.aljazeera.com/news/2019/5/8/iran-us-tensions-escalate-as-trump-imposes-new-sanctions>.

¹⁷⁰ Peter Beaumont, “Iran has enriched uranium past key limit, IAEA confirms”, *The Guardian*, 8 July 2019, <https://www.theguardian.com/world/2019/jul/08/iran-has-enriched-uranium-past-key-limit-iaea-confirms>.

¹⁷¹ “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)”, International Atomic Energy Agency, 8 July 2019, <https://www.iaea.org/sites/default/files/19/07/govinf2019-9.pdf>.

7 September: IAEA verified installation of 22 IR-4 and 1 IR-5, and 33 IR-6 centrifuges.¹⁷² Iran also announced that it had introduced UF6 to cascades of 20 IR-4 and 20 IR-6 centrifuges, again breaching Paragraph A.3.¹⁷³

- UK Foreign Office statement called this “particularly disappointing” as it attempted to get the deal back on track.¹⁷⁴
- US Secretary of Defense Mark Esper said: “They had been violating it, they had violated the nuclear non-proliferation treaty for many years, so it’s no surprise that the Iranians are going to pursue what the Iranians have always intended to pursue.”¹⁷⁵

24 September: IAEA reported Iran had begun constructing centrifuge rotor tubes using carbon fibre material not subject to continuous IAEA surveillance.¹⁷⁶ This was potentially in breach of Annex 1, Paragraph R. 79 of the JCPOA, which states: “Iran will provide the IAEA with an initial inventory of all existing centrifuge rotor tubes and bellows and subsequent reports on changes in such inventory and will permit the IAEA to verify the inventory by item counting and numbering, and through containment and surveillance, of all rotor tubes and bellows, including in all existing and newly produced centrifuges.”¹⁷⁷

14 October: In a continued breach of Paragraph A.3, Iranian President Rouhani announced at a press conference that Iran was operating IR-6, IR-4 and IR-2 centrifuges.¹⁷⁸

4 November: In a continued breach of Paragraph A.3, Ali Akbar Salehi, Director of the Atomic Energy Organization of Iran, announced that Iran had doubled its number of IR-6 centrifuges to 60. In a further breach of Paragraph A.7, he added that Iran was enriching uranium to 4.5% U-235 and that its low enriched uranium stockpile now totalled over 500 kg.¹⁷⁹

- The US responded by sanctioning Iranian officials.¹⁸⁰

5 November: In breach of Paragraph A.5, Iranian President Rouhani announced that Iran would begin injecting UF6 into 1044 IR-1 centrifuges at the Fordow facility.¹⁸¹

7 November: The IAEA’s Board of Governors reported that the agency “detected natural uranium particles of anthropogenic origin at a location in Iran not declared to the agency.”¹⁸² This is in contravention of Annex 1, O.69, or Annex 1, F.31. depending on the source of the particles.

¹⁷² “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)”, International Atomic Energy Agency, 8 September 2019, <https://www.iaea.org/sites/default/files/19/09/govinf2019-10.pdf>.

¹⁷³ Abas Aslani (@AbasAslani), *Twitter*, 7 September 2019, 7:14a.m., <https://twitter.com/AbasAslani/status/1170218645882101760>.

¹⁷⁴ “Iran nuclear deal: Tehran to develop speedier centrifuges”, *BBC News*, 7 September 2019, <https://www.bbc.co.uk/news/world-middle-east-49619246>.

¹⁷⁵ Ibid.

¹⁷⁶ Francois Murphy, “Iran commits new breach of fraying nuclear deal, expands enrichment – IAEA”, *Reuters*, 26 September 2019, <https://www.reuters.com/article/us-iran-nuclear-iaea-idUSKBN1WB237>.

¹⁷⁷ “Annex 1 – Nuclear-related measures”, *European External Action Service*, https://eeas.europa.eu/sites/eeas/files/annex_1_nuclear_related_commitments_en.pdf, p.25.

¹⁷⁸ “Iranian president announces installation of IR-9 centrifuge soon”, *Azernews*, 15 October 2019, <https://www.azernews.az/region/157272.html>.

¹⁷⁹ Nasser Karimi and Jon Gambrell, “Iran spins more centrifuges on US Embassy crisis anniversary”, *AP*, 4 November 2019, <https://apnews.com/article/de16dc4d07dd44fe9104c86ad6798e3e>.

¹⁸⁰ Bianca Britton and Sara Mazloumsaki, “Iran announces new centrifuges on 40th anniversary of US embassy siege”, *CNN*, 4 November 2019, <https://edition.cnn.com/2019/11/04/middleeast/iran-centrifuges-uranium-intl/index.html>.

¹⁸¹ “Iran’s Rouhani announces another step away from 2015 nuclear deal”, *Aljazeera*, 5 November 2019, <https://www.aljazeera.com/news/2019/11/5/irans-rouhani-announces-another-step-away-from-2015-nuclear-deal>.

¹⁸² Kendall Siewert, “Acting Director General Urges Iran to Fully Cooperate with IAEA”, International Atomic Energy Agency, 21 November 2019, <https://www.iaea.org/newscenter/news/acting-director-general-urges-iran-to-fully-cooperate-with-iaea>.

- The US Secretary of State Mike Pompeo warned that Iran may be preparing for a “rapid nuclear breakout” and called on the international community to increase pressure on Tehran.¹⁸³

11 November: The IAEA confirmed that Iran had amassed 372.3 kg of enriched uranium, including 159.7 kg of UF₆ enriched to 4.5% uranium-235, in breach of Paragraph A.7 of the JCPOA.

The IAEA also confirmed installation and testing of a variety of advanced centrifuges, including of an IR-8, an IR-s, and an IR-9 centrifuge, for use on uranium enrichment. The IAEA also confirmed that Iran had begun feeding uranium into two cascades of IR-1 centrifuges at the Fordow facility.¹⁸⁴

18 November: In a further breach of Annex 1, C.14, the IAEA verified that Iran’s heavy water stockpile had reached 131.5 metric tons.¹⁸⁵

● 2020 – 13 INCIDENTS

5 January: The Iranian Cabinet released a statement announcing that Iran would no longer adhere to JCPOA restrictions on uranium enrichment, and that it would no longer restrict the number of centrifuges used.¹⁸⁶

6 January: French President Macron, German Chancellor Merkel, and British Prime Minister Johnson released a joint statement condemning Iran’s fifth breach and urging Iran to “reverse all measures inconsistent with the JCPOA”.¹⁸⁷

14 January: E3 triggered the JCPOA’s dispute resolution mechanism.¹⁸⁸

3 March: In a continued breach of Paragraphs A.5 and A.7, Iran’s stockpile was reported by the IAEA to have exceeded 1000 kg of uranium enriched up to 4.5%, while also enriching uranium using additional centrifuges at the Fordow facility.¹⁸⁹

27 March: In a continued breach of Paragraph A.5, the AEOI announced a new generation of centrifuges would be installed at the Natanz facility.¹⁹⁰

5 June: The IAEA reported that Iran continues to exceed limits of stockpiled low-enriched uranium set out in Paragraph A.7,¹⁹¹ and continues to block IAEA access to two suspected nuclear sites, in defiance of Resolution 2231.¹⁹²

¹⁸³ Barak Ravid, “Pompeo warns of possible Iranian nuclear ‘breakout’ as tensions escalate”, *Axios*, 7 November 2019, <https://www.axios.com/iran-nuclear-deal-uranium-enrichment-mike-pompeo-5d0c9c18-9ddf-425a-aab8-91f2e473869c.html>.

¹⁸⁴ “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)”, International Atomic Energy Agency, 11 November 2019, <https://www.iaea.org/sites/default/files/19/11/gov2019-55.pdf>.

¹⁸⁵ Daphne Psaedakis, “U.S. to no longer waive sanctions on Iranian nuclear site”, *Reuters*, 18 November 2019, <https://www.reuters.com/article/us-usa-iran/u-s-to-no-longer-waive-sanctions-on-iranian-nuclear-site-watching-irans-protests-pompeo-idUSKBN1XS2DG>.

¹⁸⁶ Javad Zarif (@JZarif), *Twitter*, 5 January 2020, 7:10p.m., <https://twitter.com/JZarif/status/1213900666164432900>.

¹⁸⁷ “Joint Statement from President Macron, Chancellor Merkel and Prime Minister Johnston”, *Élysee*, 6 January 2020, <https://www.elysee.fr/en/emmanuel-macron/2020/01/06/joint-statement-from-president-macron-chancellor-merkel-and-prime-minister-johnson>.

¹⁸⁸ “Press release: E3 foreign ministers’ statement on the JCPOA: 14 January 2020”, Foreign & Commonwealth Office, 14 January 2020, <https://www.gov.uk/government/news/e3-foreign-ministers-statement-on-the-jcpoa-14-january-2020>.

¹⁸⁹ Kiyoko Metzler and David Rising, “UN agency: Iran nearly triples stockpile of enriched uranium”, *AP*, 3 March 2020, <https://apnews.com/article/40f58d4d8114a774c7771a68345d6b0f>.

¹⁹⁰ “Iran produces new generation of centrifuges”, *Tehran Times*, 27 March 2020, <https://www.tehrantimes.com/news/446338/Iran-produces-new-generation-of-centrifuges>.

¹⁹¹ “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)”, International Atomic Energy Agency, 5 June 2020, <https://www.iaea.org/sites/default/files/20/06/gov2020-26.pdf>.

¹⁹² “NPT safeguards agreement with the Islamic Republic of Iran”, International Atomic Energy Agency, 5 June 2020, <https://www.iaea.org/sites/default/files/20/06/gov2020-30.pdf>.

8 September: US Secretary of State Mike Pompeo tweeted “Iran’s uranium stockpile is more than 10 times the limit set by the JCPOA. The E3 and other nations must wake up to the fact that the nuclear deal is history...”¹⁹³

3 November: Iran’s Parliament approved a provisional bill calling on the AEOI to begin enriching up to 20% uranium,¹⁹⁴ in further breach of Paragraphs A.5 and A.7.

11 November: The IAEA released a report which indicated that Iran’s stockpile of uranium gas enriched up to 4.5% uranium-235 equated to 2443 kg, up 338 kg from the last quarter, in further breach of Paragraph A.7.¹⁹⁵

14 November: The IAEA reported that Iran began enrichment using advanced IR-2m centrifuges at Natanz. This marked a further violation of the JCPOA, Paragraph A.2.¹⁹⁶

2 December: Iran’s Guardian Council approved legislation mandating the AEOI to increase enrichment levels to 20% and suspend implementation of the Additional Protocol if sanctions were not addressed in 60 days.¹⁹⁷

4 December: The IAEA released a report stating that Iran intended to install three additional cascades of IR-2m centrifuges at the Natanz plant, in further breach of Paragraph A.2.¹⁹⁸

18 December: Satellite imagery revealed that Iran had begun construction at the underground Fordow facility, in breach of Paragraph A.5.¹⁹⁹

● 2021 - 6 INCIDENTS

4 January: Iran began enriching uranium to 20% uranium-235,²⁰⁰ in a further breach of Paragraph A.7.²⁰¹

- Biden transition team refused to comment.²⁰²
- EU called the move a “significant departure” from Iran’s non-proliferation commitments.²⁰³
- **5 January:** US announced extra sanctions on Iran’s steel sector.²⁰⁴
- **6 January:** E3 released a statement “strongly urging” Iran to stop.²⁰⁵

¹⁹³ Secretary Pompeo (@SecPompeo), *Twitter*, 8 September 2020, 5:18p.m., <https://twitter.com/SecPompeo/status/1303367064892116998>.

¹⁹⁴ “Iran parliament approves bill on uranium enrichment”, *MEMO Middle East Monitor*, 3 November 2020, <https://www.middleeastmonitor.com/20201103-iran-parliament-approves-bill-on-uranium-enrichment/>.

¹⁹⁵ “Verification and monitoring in the Islamic Republic of Iran in light of united Nations Security Council resolution 2231 (2015)”, International Atomic Energy Agency, 11 November 2020, <https://www.iaea.org/sites/default/files/20/11/gov2020-51.pdf>.

¹⁹⁶ Francois Murphy, “Iran feeds uranium gas into advanced centrifuges underground -IAEA report”, *Reuters*, 18 November 2020, <https://www.reuters.com/article/iran-nuclear-iaea-int-idUSKBN27YOW5>.

¹⁹⁷ “Iran passes law threatening to halt nuclear inspections and boost enrichment”, *The Guardian*, 3 December 2020, <https://www.theguardian.com/world/2020/dec/03/iran-passes-law-threatening-to-halt-nuclear-inspections-and-boost-enrichment>.

¹⁹⁸ “Iran plans to install more advanced atomic centrifuges underground – IAEA”, *Reuters*, 4 December 2020, <https://www.reuters.com/article/iran-nuclear-iaea/iran-plans-to-install-more-advanced-atomic-centrifuges-underground-iaea-idUKV9N2FR01H>.

¹⁹⁹ Jon Gambrell, “Iran builds at underground nuclear facility amid US tensions”, *AP*, 18 December 2020, <https://apnews.com/article/iran-underground-nuclear-facility-d9809b8a61f71f87dff31da6ff784687>.

²⁰⁰ Javad Zarif (@JZarif), *Twitter*, 4 January 2021, 3:04p.m., <https://twitter.com/JZarif/status/1346110272482799616>.

²⁰¹ “Iran resumes enriching uranium to 20% purity at Fordo facility”, *BBC News*, 4 January 2021, <https://www.bbc.co.uk/news/world-middle-east-55530366>.

²⁰² Parisa Hafezi, “Iran resumes 20% enrichment at Fordow amid rising tensions with U.S.”, *Reuters*, 4 January 2021, <https://www.reuters.com/article/uk-iran-nuclear-enrichment-idUKKBN29910A>.

²⁰³ Ibid.

²⁰⁴ Toi Staff and Agencies, “Iran says it’s installing 1000 more centrifuges as US slaps on new sanctions”, *The Times of Israel*, 5 January 2021, <https://www.timesofisrael.com/iran-says-its-installing-1000-more-centrifuges-as-us-slaps-on-new-sanctions/>.

²⁰⁵ “E3 foreign ministers’ statement on JCPoA: 6 January 2021”, Foreign, Commonwealth & Development Office, 6 January 2021, <https://www.gov.uk/government/news/e3-foreign-ministers-statement-on-jcpoa-6-january-2021>.

5 January: The AEOI announced Iran was in the process of installing one thousand new IR-2m centrifuges that would be used to significantly boost the country's enriched uranium output.²⁰⁶ This a further breach of Paragraphs A.2 and A.7.

13 January: The IAEA released a report detailing Iran's plans to conduct research and development activities into uranium metal production, in violation of Annex 1, E.25 which prohibits Iran from producing or otherwise acquiring uranium metal for 15 years.²⁰⁷

16 January: France, Germany and the United Kingdom released a statement condemning Iran's plans to produce uranium metal and urging Iran to halt the activity and return to its JCPOA commitments immediately.²⁰⁸

26 January: The Iranian Government stated that if US sanctions were not lifted by 21 February, then Iran would cease allowing IAEA snap inspections.²⁰⁹ Snap inspections currently take place under the Additional Protocol, something Iran agreed to abide by in Paragraph A.1 of the JCPOA.

22 March: Western intelligence officials received reports Iran was concealing aspects of its nuclear programme, including components for advanced centrifuges, in breach of Paragraph C.15.²¹⁰

10 April: President Rouhani announced that Iran had developed a batch of new advanced centrifuges, in further breach of Paragraphs A.2 and A.3 of the JCPOA.²¹¹

²⁰⁶ "AEOI Head: Iran to boost No. of Centrifuges by 1000 soon", *Fars News Agency*, 5 January 2021, <https://www.farsnews.ir/en/news/13991016000862/AEOI-Head-Iran-Bs-N-f-Cenrifges-by-000-Sn>.

²⁰⁷ Francois Murphy, "Iran works on uranium metal for reactor fuel in new breach of nuclear deal", *Reuters*, 13 January 2021, <https://www.reuters.com/article/us-iran-nuclear-uranium/iran-works-on-uranium-metal-for-reactor-fuel-in-new-breach-of-nuclear-deal-idUSKBN29I2AG>.

²⁰⁸ "E3 statement on the JCPoA: 16 January 2021", Foreign, Commonwealth & Development Office, 16 January 2021, <https://www.gov.uk/government/news/e3-statement-on-the-jcpoa-16-january-2020>.

²⁰⁹ "Iran will take steps next month to curb short notice IAEA inspections: official", *Reuters*, 26 January 2021, <https://www.reuters.com/article/us-iran-nuclear-idUSKBN29V21V>.

²¹⁰ Con Coughlin, "Iran concealing elements of nuclear activities, officials fear", *The Telegraph*, 22 March 2021, <https://www.telegraph.co.uk/news/2021/03/22/iran-conceals-elements-nuclear-activities-officials-fear/>.

²¹¹ Maziar Motamedi, "Iran tests newest advanced nuclear centrifuges", *Aljazeera*, 10 April 2021, <https://www.aljazeera.com/news/2021/4/10/iran-unveil-advanced-centrifuges-civilian-nuclear-achievements>.

Annex B: Iranian ICBM programme

Below is a list of all verified instances of Iranian ICBM tests and unveilings.

● 2016 - 4 INCIDENTS

8-9 March: Iran tested Qiam 1 ballistic missile.²¹² This short-range ballistic missile was used against Coalition forces in Iraq by the IRGC in the aftermath of the killing of Qasem Solemani in January 2020. It is assessed to be able to deliver a nuclear payload.²¹³ There have also been many reported Houthi attacks against Saudi Arabia using Iranian-supplied Qiam 1 missiles, in further breaches of Resolution 2231 and the JCPOA.

11 July: Tested Khorramshahr ballistic missile.²¹⁴

25 September: Iran unveiled Zolfaghar ballistic missile.²¹⁵

15 November: Tested Qiam ballistic missile and used Star of David as the intended target.²¹⁶

● 2017 - 3 INCIDENTS

29 January: Iran unveiled Khorramshahr ballistic missile.²¹⁷ Based on North Korean Musudan (BM-25) missiles purchased in c.2005.²¹⁸

18 June: Launched six Zolfaghar missiles at ISIL in Syria.²¹⁹

3 July: E3 + US reported a medium-range ballistic missile test in Iran.²²⁰

● 2018 - 7 INCIDENTS

January: Israel reported that Iran had tested a Shahab-3 variant and Scud variant.²²¹

February–August: One Khorramshahr, two Shahab-3 variants, one Qiam, and three Zolfaghar ballistic missiles were flight-tested.²²²

10 May: Israel stated that rockets launched from the Syrian Arab Republic towards Israel on 10 May 2018 had been launched “by the Quds Force of the Iranian Revolutionary Guard”.²²³

23 May: Israel reported that rockets launched from the Syrian Arab Republic towards Israel had been launched “by the Quds Force of the Iranian Revolutionary Guard”.²²⁴

²¹² “Iran ‘conducts new ballistic missile tests’”, *BBC News*, 8 March 2016, <https://www.bbc.co.uk/news/world-middle-east-35752974>.

²¹³ “Qiam”, Missile Defense Advocacy Alliance, 5 June 2018, <https://missiledefenseadvocacy.org/missile-threat-and-proliferation/todays-missile-threat/iran/qiam/>.

²¹⁴ “Open-source analysis of Iran’s missile and UAV capabilities and proliferation (2021)”, International Institute of Strategic Studies, 20 April 2021, <https://www.iiss.org/blogs/research-paper/2021/04/iran-missiles-uavs-proliferation>.

²¹⁵ “Zolfaghar”, Missile Threat: CSIS Missile Defense Project, 20 June 2017, last modified 22 January 2020, <https://missilethreat.csis.org/missile/zolfaghar/>.

²¹⁶ “Fourth report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 8 December 2017, <https://www.undocs.org/S/2017/1030>.

²¹⁷ Jennifer Griffin and Lucas Y. Tomlinson, “Iran tests ballistic missile in defiance of UN resolution, US officials say”, *Fox News*, 30 January 2017, <https://www.foxnews.com/world/iran-tests-ballistic-missile-in-defiance-of-un-resolution-us-officials-say>.

²¹⁸ “Khorramshahr”, Missile Threat: CSIS Missile Defense Project, 29 September 2017, last modified 15 June 2018, <https://missilethreat.csis.org/missile/khorramshahr/>.

²¹⁹ “Zolfaghar”, Missile Threat: CSIS Missile Defense Project.

²²⁰ “Fourth report of the Secretary-General”, United Nations Security Council.

²²¹ “Sixth report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 6 December 2018, <https://undocs.org/S/2018/1089>.

²²² *Ibid.*

²²³ “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary-General”, United Nations Security Council, 12 June 2018, <https://www.undocs.org/S/2018/602>.

²²⁴ *Ibid.*

13 August: Iran unveiled Fatah-e Mobin ballistic missile.²²⁵ This is an upgraded version of the Fateh 110, which is “assumed to be nuclear capable”²²⁶ with a payload of 500 kg and range of 200–300 km.

1 October: Iran launched Zolfaghar and Qiam missiles at ISIL in Syria.²²⁷

1 December: Iran tested a medium-range ballistic missile.²²⁸

● 2019 – 7 INCIDENTS

7 February: Iran unveiled the Dezful ballistic missile.²²⁹ This is another upgraded version of the Fateh 110,²³⁰ with a payload of 600–700 kg²³¹ and range of 1100 km.

9 February: Iran unveiled the Ra’ad 500 ballistic missile,²³² another upgraded version of the Fateh 110.²³³

4 April: Israel stated on 20 January 2019 that “the Quds Force of Iran’s Islamic Revolutionary Guard Corps” launched a surface-to-surface missile from the area of Damascus towards the Israeli-occupied Golan.²³⁴

22 April: The E3 brought to the UN’s attention “undated footage released on social media that revealed a previously unseen flight test of a new Shahab-3 medium-range ballistic missile variant equipped with a manoeuvrable re-entry vehicle.”²³⁵

24 July: The E3 reported that “the Islamic Republic of Iran flight-tested a ballistic missile that flew over 1,000 km and that media reporting indicated that this flight test involved a Shahab-3 missile.”²³⁶

25 July: The US reported an Iranian ballistic missile launch to the UN.²³⁷

17 August: The US reported a further Iranian ballistic missile launch to the UN.²³⁸

● 2020 – 7 INCIDENTS

8 January: Qiam-1s launched at US troops at Iraq’s Ayn al Asad Airbase.²³⁹

²²⁵ Daniel Cebul, “Iran unveils ‘Bright Conqueror’ missile”, *Defense News*, 13 August 2018, <https://www.defensenews.com/global/mideast-africa/2018/08/13/iran-unveils-bright-conqueror-missile/>.

²²⁶ “Fateh-110”, Missile Threat: CSIS Missile Defense Project, 9 August 2016, last modified 14 January 2020, <https://missilethreat.csis.org/missile/fateh-110/#easy-footnote-bottom-4-325>.

²²⁷ “Open-source analysis of Iran’s missile and UAV capabilities and proliferation (2021)”, International Institute of Strategic Studies.

²²⁸ “Sixth report of the Secretary-General,” United Nations Security Council.

²²⁹ “Iran unveils news Dezful ballistic missile”, *The Defense Post*, 7 February 2019, <https://www.thedefensepost.com/2019/02/07/iran-defzul-ballistic-missile/>.

²³⁰ Einhorn, R., and Van Diepen, V., ‘Constraining Iran’s Missile Capabilities’, *Brookings*, available at: https://www.brookings.edu/wp-content/uploads/2019/03/FP_20190321_missile_program_WEB.pdf.

²³¹ *Military-Today*, ‘Dezful’, available at: <http://www.military-today.com/missiles/dezful.htm>.

²³² Kelsey Davenport, “Iran Displays New Solid-Fuel Missile”, Arms Control Association, March 2020, <https://www.armscontrol.org/act/2020-03/news/iran-displays-new-solid-fuel-missile>.

²³³ Don Jacobson, “Iran unveils new lightweight, short-range ballistic missile”, *UPI*, 10 February 2020, https://www.upi.com/Top_News/World-News/2020/02/10/Iran-unveils-new-lightweight-short-range-ballistic-missile/9791581333226/.

²³⁴ “Implementation of Security Council resolution 2231 (2015): Seventh report of the Secretary-General”, United Nations Security Council, 13 June 2019, <https://undocs.org/S/2019/492>.

²³⁵ “Implementation of Security Council resolution 2231 (2015): Eighth report of the Secretary-General”, United Nations Security Council, 10 December 2019, <https://www.undocs.org/S/2019/934>.

²³⁶ *Ibid.*

²³⁷ *Ibid.*

²³⁸ *Ibid.*

²³⁹ “Open-source analysis of Iran’s missile and UAV capabilities and proliferation (2021)”, International Institute of Strategic Studies.

9 February: Iran launched Simorgh space launch vehicle. US, E3 and Israel claimed this “incorporates virtually identical technologies to those used in ballistic missiles designed to be capable of carrying nuclear weapons”.²⁴⁰

22 April: Iran launched Qased space launch vehicle. US, E3 and Israel claimed this “incorporates virtually identical technologies to those used in ballistic missiles designed to be capable of carrying nuclear weapons”.²⁴¹

28 July: Iran launched ballistic missiles against a mock-up of a US carrier.²⁴²

20 August: Iran unveiled the Martyr Hajj Qasem ballistic missile,²⁴³ another upgraded version of the Fateh 110²⁴⁴ with a payload of 500 kg²⁴⁵ and range of 1600 km.

27 September: The IRGC unveiled the Zolfaghar Basir, the naval variant of the surface-to-surface Zolfaghar ballistic missile, with a range of over 700 km.²⁴⁶ Based on the Zolfaghar missile, which was used against Coalition forces in Iraq by the IRGC in January 2020.

4 November: Footage emerged showing new underground magazines of Iranian ballistic missiles.²⁴⁷

● 2021 - 4 INCIDENTS

January: *Great Prophet* 15 military exercise tested ballistic missiles including the Sajjil-2, which is nuclear-capable.²⁴⁸

1 February: “Iran announced it had recently successfully carried out a below-orbit test-launch of the Zuljanah, a rocket capable of carrying a satellite into orbit.”²⁴⁹

14 February: Iran tested a new short-range “smart missile”.²⁵⁰

15 March: Iran released footage of the IRGC’s “missile city”, full of ballistic missiles.²⁵¹

Nuclear-capable Iranian missiles:

- The internationally recognised threshold for a nuclear capable missile, as set out by the Missile Technology Control Regime (MTCR), is being able to send a 500 kg payload 300 km or more.

²⁴⁰ “Implementation of Security Council resolution 2231 (2015): Ninth report of the Secretary-General”, United Nations Security Council, 11 June 2020, <https://www.undocs.org/S/2020/531>.

²⁴¹ Ibid.

²⁴² Amir Vahdat, “In latest message to US, Iran launches underground ballistic missiles during exercise targeting mock carrier”, *Military Times*, 29 July 2020, <https://www.militarytimes.com/news/your-military/2020/07/29/in-latest-message-to-us-iran-launches-underground-ballistic-missiles-during-exercise-targeting-mock-carrier/>.

²⁴³ Thomas Newdick, “Iran Unveils New Solid-Fuel Ballistic Missile Named After The General America Killed”, *The Drive*, 20 August 2020, <https://www.thedrive.com/the-war-zone/35891/iran-unveils-new-solid-fuel-ballistic-missile-named-after-the-general-america-killed>.

²⁴⁴ “Iran unveils ‘Haj Qassem’ and ‘Abu Mahdi’ missiles”, *Middle East Monitor*, 20 August 2020, <https://www.middleeastmonitor.com/20200820-iran-unveils-haj-qassem-and-abu-mahdi-missiles/>.

²⁴⁵ Farzin Nadimi, “Iran Flaunts New Missile and Jet Engine Technology”, *The Washington Institute for Near East Policy*, 28 August 2020, <https://www.washingtoninstitute.org/policy-analysis/iran-flaunts-new-missile-and-jet-engine-technology>.

²⁴⁶ “Iran’s IRGC unveils new ballistic missile”, *Al-Arabiya News*, 27 September 2020, <https://english.alarabiya.net/News/middle-east/2020/09/27/Iran-s-IRGC-unveils-new-naval-ballistic-missile->.

²⁴⁷ Thomas Newdick, “Iran Now Has Mobile Ballistic Missile Launching ‘Magazines’ For Its Underground Bases”, *The Drive*, 4 November 2020, <https://www.thedrive.com/the-war-zone/37440/iran-now-has-automated-missile-launching-magazines-for-its-underground-bases>.

²⁴⁸ “Open-source analysis of Iran’s missile and UAV capabilities and proliferation (2021)”, International Institute of Strategic Studies.

²⁴⁹ “Iran’s Ballistic Missile Program”, *United Against Nuclear Iran*, March 2021, UPDATE_UANI_Ballistic Missile Report_03162021_clean.pdf (unitedagainstnucleariran.com).

²⁵⁰ “Iran’s army test fires short-range ‘smart’ missile”, *ABC News*, 14 February 2021, <https://abcnews.go.com/International/wireStory/irans-army-test-fires-short-range-smart-missile-75892245>.

²⁵¹ “Iran’s Ballistic Missile Programme”, *United Against Nuclear Iran*.

- The UK, US and E3 argue that Iran should be bound by this threshold; Russia and China contend that the missile should be specifically fitted with technology to make it nuclear-capable.²⁵²

Iranian missiles known or deemed 'likely' to exceed MCTR limits:²⁵³

- Shahab-1
- Shahab-2
- Shahab-3
- Qadr-1
- Sajjil
- Qiam-1
- Emad
- Khorramshahr.

Space launch vehicles:²⁵⁴ **(Currently unable to be used as ballistic missiles):**

- Safir
- Simorgh
- Qased
- Zoljanah.

Space launch vehicles in development:²⁵⁵

- Sarir
- Soroush
- Soroush-2.

Known/suspected Iranian proxies supplied with ballistic missiles:²⁵⁶

- Popular Mobilisation Forces and various Shia militant groups in Iraq²⁵⁷
 - "In 2018, a Reuters report alleged Iran had transferred Zelzals, Fateh-110s and Zolfaghars to non-state actors in the country and established a domestic rocket or missile production capability."
 - "A year later, Israel struck at least seven sites under the control of Shia militias in order to neutralise munitions that could be used against it."
 - "In 2020, a new pro-Iranian Shia militia called Assaba al-Tha'ereen claimed that it was in possession of missiles with the range to strike Israel."
- Syria
 - Fateh-110 variants deployed by Assad regime at various points of Syrian Civil War.
 - Qiams, Fateh-110s and Zolfhagars stored by the IRGC in the country.
- Houthis
 - 2017, 2019 and 2020 unveiled Qiam missile variants.
 - Quds-1 and Quds-2 missiles all thought to be of Iranian origin.
 - Iranian assistance suspected in development of Badr and Fajr families of missiles.

²⁵² "Open-source analysis of Iran's missile and UAV capabilities and proliferation (2021)", International Institute of Strategic Studies.

²⁵³ Ibid.

²⁵⁴ Ibid.

²⁵⁵ Ibid.

²⁵⁶ Ibid, p.19-33.

²⁵⁷ Ibid.

Annex C: Houthi missile attacks on Saudi Arabia

● 2015 - 4 INCIDENTS

6 June: Saudi Arabia intercepted a Scud missile fired by the Houthis. The missile was shot down by a Patriot missile battery near Khamis Mushait.²⁵⁸

26 August: Pro-Houthi Yemeni army units fired a Scud missile into Saudi Arabia. The Saudi military said that the missile targeted an electricity station in Jizan province, but was intercepted.²⁵⁹

15 October: The Houthis fired a Scud missile across the border near Khamis Mushait.²⁶⁰

31 December: Saudi civil defence authorities claimed that three civilians were killed in Saudi Arabia from cross-border missile attacks.²⁶¹

● 2016 - 15 INCIDENTS

31 January: The Yemeni forces fired 70 missiles at Al-Qawiya and Jbal al-Dokhan military bases in Jizan province, killing over ten Saudi troops.²⁶²

1 February: Alarabiya reported a Houthi-launched rocket from Yemen that killed a child and wounded nine other civilians in Najran.²⁶³

16 August: Cross-border strikes by the Houthis killed seven civilians in Najran, according to Saudi state television.²⁶⁴

21 August: The Saudi military base in Najran was attacked by a Houthi Tochka ballistic missile, causing at least 50 deaths.²⁶⁵

28 August: A Houthi-fired rocket killed two girls in Najran.²⁶⁶

28 August: A Houthi rocket was fired at a Saudi power station, killing a three-year-old boy.²⁶⁷

28 August: A rocket was fired from Yemen, striking a civilian neighbourhood in Saudi Arabia, killing two children.²⁶⁸

²⁵⁸ Abdullah al-Shihri, "Houthi Rebels fire Scud missile from Yemen into Saudi Arabia", *The Washington Post*, 6 June 2015, https://www.washingtonpost.com/world/houthi-rebels-fire-scud-missile-from-yemen-into-saudi-arabia/2015/06/06/00e39c44-0c89-11e5-a7ad-b430fcd1d3f5c_story.html.

²⁵⁹ "Saudi military intercepts scud missile fired by Yemeni forces", *Reuters*, 26 August 2015, <https://www.reuters.com/article/us-yemen-security/saudi-military-intercepts-scud-missile-fired-by-yemeni-forces-idUSKCN0QVONQ20150826>.

²⁶⁰ Ian Black, "Saudis strike in response to Houthi Scud attack as forgotten war rages on", *The Guardian*, 15 October 2015, <https://www.theguardian.com/world/2015/oct/15/saudi-arabia-strike-response-houthi-scud-attack-forgotten-war>.

²⁶¹ "Saudi says 3 civilians killed in missile fire from Yemen", *Middle East Eye*, 1 January 2016, <https://www.middleeasteye.net/news/saudi-says-3-civilians-killed-missile-fire-yemen>.

²⁶² "Yemeni Snipers Kill 5 Saudi Border Guards in Jizan", *FARS News Agency*, 1 February 2016, <https://web.archive.org/web/20160202111816/http://en.farsnews.com/newstext.aspx?nn=13941112000650>.

²⁶³ Hani al-Sofyan, "Yemeni Houthi rocket kills child in Saudi border city of Najran", *Alarabiya News*, 1 February 2016, <https://english.alarabiya.net/en/News/middle-east/2016/02/01/Yemeni-Houthi-rocket-kills-child-in-Saudi-Arabia.html>.

²⁶⁴ "Houthi shelling kills seven in Saudi Arabia, nine Yemenis die in air strike", *Reuters*, 16 August 2016, <https://www.reuters.com/article/us-yemen-security-idUSKCN10R17K>.

²⁶⁵ Leith Aboufadel, "Houthi missile attack kills 50+ Saudi soldiers in Najran", *AMN News*, 21 August 2016, <https://www.almasdarnews.com/article/houthi-missile-attack-kills-50-saudi-soldiers-najran/>.

²⁶⁶ Ahmed Al Omran, "Yemen Houthi Rocket Attack Kills Two Girls in Saudi Arabia", *The Wall Street Journal*, 28 August 2016, <https://www.wsj.com/articles/yemen-houthi-rocket-attack-kills-two-girls-in-saudi-arabia-1472415740>.

²⁶⁷ "Three-year-old killed in cross-border Houthi attack on Saudi Arabia", *The New Arab*, 28 August 2016, <https://english.alaraby.co.uk/english/news/2016/8/27/three-year-old-killed-in-cross-border-houthi-attack-on-saudi-arabia>.

²⁶⁸ "Saudis say rocket fired from Yemen kills 2 children", *AP*, 28 August 2016, <https://apnews.com/article/10117dc48ccf4a9296e8b4003d36d66a>.

- 4 September:** A missile strike from Yemen killed one woman and two children.²⁶⁹
- 4 October:** Houthis destroyed three Saudi tanks in Najran.²⁷⁰
- 10 October:** The Houthis launched a ballistic missile at the Taif military base in Saudi Arabia. The missile was intercepted, but went further than any other missile launched from Yemen had previously.²⁷¹
- 8 November:** Five Saudis were injured by a missile fired from Yemen into Jizan.²⁷²
- 10 November:** 14 people were injured in the kingdom's south-western Dhahran al-Janoub province by "projectiles" fired from Yemen.²⁷³
- 15 November:** A Houthi missile which targeted Najran was intercepted by Saudi air defences.²⁷⁴
- 18 November:** Saudi's Interior Ministry reported that a soldier was killed by a cross-border missile attack just hours before a 48-hour ceasefire was due to commence.²⁷⁵
- 22 November:** Missiles were fired from Yemen, striking a Saudi shopping centre, causing eight casualties.²⁷⁶
- **2017 - 9 INCIDENTS**
- 30 January:** The Houthis' official news agency said that they launched a ballistic missile at a Saudi-led Coalition military base on the Red Sea island of Zuqar.²⁷⁷
- 23 March:** Several Saudi soldiers were killed by missile strikes from Yemen.²⁷⁸
- 19 May:** The Houthis reported that they fired a ballistic missile at Saudi Arabia's capital Riyadh. The Saudi-led Coalition intercepted the missile.²⁷⁹
- 22 July:** The Houthis fired a Burkan-2 ballistic missile at an oil refinery in Saudi Arabia.²⁸⁰
- 26 July:** Houthis fired a Scud missile at an oil facility near the port city of Yanbu in Saudi Arabia.²⁸¹

²⁶⁹ Mahmoud Barakat, "Shelling from Yemen kills woman in Saudi Arabia", *Anadolu Agency*, 4 September 2016, <https://www.aa.com.tr/en/middle-east/shelling-from-yemen-kills-woman-in-saudi-arabia/640835>.

²⁷⁰ Leith Aboufadel, "Houthi forces destroy 3 Saudi tanks in Najran", *AMN News*, 5 October 2016, <https://www.almasdarnews.com/article/houthi-forces-destroy-3-saudi-tanks-najran/>.

²⁷¹ Mohammed Ghobari, "Yemen's Houthi respond to air strike with missile attack", *Reuters*, 10 October 2016, <https://www.reuters.com/article/us-yemen-security-idUSKCN12A13J>.

²⁷² Ahmed al-Masri, "5 Saudis injured by cross-border fire from Yemen", *Anadolu Agency*, 8 November 2016, <https://www.aa.com.tr/en/middle-east/5-saudis-injured-by-cross-border-fire-from-yemen/680907>.

²⁷³ Zakaria al-Kamaali, "Yemen's Houthis claim to seize villages in Saudi Arabia", *Anadolu Agency*, 11 November 2016, <https://www.aa.com.tr/en/middle-east/yemen-s-houthis-claim-to-seize-villages-in-saudi-arabia/683641>.

²⁷⁴ Aarti Nagraj, "Saudi intercepts and damages missile from Yemen", *Gulf Business*, 16 November 2016, <http://gulfbusiness.com/saudi-intercepts-missile-from-yemen/>.

²⁷⁵ Mohammed Ghobari, "Houthi missile and Saudi-led air strikes strain Yemen truce", *Reuters*, 19 November 2016, <https://www.reuters.com/article/us-yemen-security-idUSKCN12A13J>.

²⁷⁶ "One person killed, seven wounded in Saudi Arabia in Houthis' attack", *Arab Times*, 22 November 2016, <http://www.arabtimesonline.com/news/one-person-killed-seven-wounded-s-saudi-arabia-houthis-attack/>.

²⁷⁷ "Yemen's Houthi attack Saudi ship, launch ballistic missile", *Reuters*, 30 January 2017, <https://www.reuters.com/article/us-yemen-security-saudi-idUSKBN15E2KE>.

²⁷⁸ "Houthi shelling kills 'several Saudi soldiers'", *The New Arab*, 24 March 2017, <https://english.alaraby.co.uk/english/news/2017/3/24/houthi-shelling-kills-several-saudi-soldiers>.

²⁷⁹ Faisal Al Nasser, "Houthi rebels fire missiles from Yemen into Saudi Arabia", *NBC News*, 26 March 2018, <https://www.nbcnews.com/news/world/houthi-rebels-fire-missiles-yemen-saudi-arabia-n859946>.

²⁸⁰ Chris Tomson, "Saudi Arabian oil refineries set on fire by long-range Yemeni missile", *Almasdarnews*, 23 July 2017, <https://www.almasdarnews.com/article/saudi-arabian-oil-refineries-set-fire-long-range-yemeni-missile/>.

²⁸¹ Ryan Browne, "US officials: Iranian-backed group fired missile deep into Saudi Arabia", *CNN*, 27 July 2017, <https://edition.cnn.com/2017/07/26/politics/iranian-group-fired-missile-saudi-arabia/index.html>.

27 July: Houthis claimed to have hit King Fahad Airbase with four missiles.²⁸²

28 July: Saudi air defences intercepted a Houthi ballistic missile launched towards Makkah.²⁸³

6 November: Saudi Arabian officials blamed Iran for the missile strike aimed at Riyadh Airport two days previously.²⁸⁴

19 December: Saudi Arabia intercepted a ballistic missile over Riyadh. The Houthis claimed responsibility for the attack, targeting the royal Yamama Palace.²⁸⁵

● 2018 - 24 INCIDENTS

16 January: Houthi rebels reported that they fired a ballistic missile towards a regional airport in the Saudi province of Jizan. Saudi defence forces shot down the missile.²⁸⁶

18 January: The Houthis fired a missile into the border province of Najran in Saudi Arabia. The missile inflicted heavy damage to an air defence base in the Khadhra crossing point.²⁸⁷

30 January: The Houthis reported that they fired a long-range ballistic missile at King Khaled International Airport in Riyadh.²⁸⁸

25 March: The Houthis fired seven missiles at four Saudi cities – three at the capital Riyadh, one at the southwest city of Khamis Mushait, one at southern Najran, and two at Jizan. The Houthi Ministry of Defence claimed that the missiles hit seven different targets, including four airports. The Saudi Coalition reported that all missiles were intercepted and destroyed. Debris from the intercepted missiles killed an Egyptian resident.²⁸⁹

29 March: The Houthis fired a ballistic missile from the northern Yemeni province of Saada at the Saudi city of Jizan. Saudi air defence intercepted the missile.²⁹⁰

31 March: Saudi air defences intercepted a Houthi missile. The missile targeted a Saudi National Guard base in the southern city Najran. An Indian resident was injured by debris.²⁹¹

3 April: Houthi rebels attacked with a missile a Saudi oil tanker west of Hodeidah, located in international waters. A Coalition warship intervened and escorted the tanker, which sustained minimal damage.²⁹²

4 April: Saudi Arabia intercepted a Houthi missile, intended for southern Jizan.²⁹³

²⁸² Michael Knights, "Countering Iran's Missile Proliferation in Yemen", *The Washington Institute*, 8 November 2017, <https://www.washingtoninstitute.org/policy-analysis/countering-irans-missile-proliferation-yemen>.

²⁸³ "Timeline: Houthi attacks on Saudi Arabia", *Arab News*, 13 June 2019, <https://www.arabnews.com/node/1510206/saudi-arabia>.

²⁸⁴ "Iran rejects 'malicious' Saudi accusations after attack", *Aljazeera*, 6 November 2017, <https://www.aljazeera.com/news/2017/11/6/iran-rejects-malicious-saudi-accusations-after-attack>.

²⁸⁵ Abdullah al-Shihri and Aya Batrawy, "Saudis intercept Yemen rebel missile targeting royal palace", *AP*, 19 December 2017, <https://apnews.com/article/yemen-ap-top-news-houthis-international-news-riyadh-74651c2e27cc4f1793e8922eceb18644>.

²⁸⁶ "Yemen's Houthis fire ballistic missile at Saudi airport", *Xinhua Net*, 17 January 2018, http://www.xinhuanet.com/english/2018-01/17/c_136900722.htm.

²⁸⁷ Ahmad Majidyar, "Iran-backed Yemeni rebels fire another missile into Saudi Arabia", *MEI*, 5 February 2018, <https://www.mei.edu/publications/iran-backed-yemeni-rebels-fire-another-missile-saudi-arabia>.

²⁸⁸ "Yemen's Houthis attack Saudi airport by firing ballistic missile", *Xinhua Net*, 30 January 2018, http://www.xinhuanet.com/english/2018-01/30/c_136936470.htm.

²⁸⁹ Amir Vera and Nic Robertson, "Saudi Arabia: 7 missiles fired from Yemen, 1 killed from falling debris", *CNN*, 26 March 2018, <https://edition.cnn.com/2018/03/25/middleeast/saudi-arabia-intercepts-missile/index.html>.

²⁹⁰ "New Houthi missile attack against Saudi Arabia is shot down", *The National*, 30 March 2018, <https://www.thenationalnews.com/world/mena/new-houthi-missile-attack-against-saudi-arabia-is-shot-down-1.717251>.

²⁹¹ "Najran: Houthi missile intercepted, Indian injured", *Aljazeera*, 31 March 2018, <https://www.aljazeera.com/news/2018/3/31/najran-houthi-missile-intercepted-indian-injured>.

²⁹² Saeed Al-Batati and Rick Gladstone, "Houthi Rebels Hit Saudi Tanker With Missile to Avenge Deadly Airstrike", *The New York Times*, 3 April 2018, <https://www.nytimes.com/2018/04/03/world/middleeast/houthi-missile-saudi-yemen.html>.

²⁹³ "Missile fired by Houthis on Jazan intercepted, says Saudi Arabia", *Alarabiya*, 5 April 2018, <https://english.alarabiya.net/News/gulf/2018/04/05/Missile-fired-by-Houthis-on-Jazan-intercepted-says-Saudi-Arabia>.

6 April: The Houthis launched a missile at the southern Saudi city Najran. Saudi air defences intercepted the missile. No damage or casualties were reported.²⁹⁴

11 April: The Houthis launched a Burkan 2-H ballistic missile at the Saudi capital Riyadh, and also targeted oil facilities in southern Najran and Jizan, according to the Houthi's Al Masirah network. The missile travelled more than 500 miles into Saudi Arabia before it was intercepted by Saudi air defences.²⁹⁵

12-13 April: Saudi air defence forces intercepted a Houthi missile targeting southern Jizan.²⁹⁶

22 April: The Houthis fired a ballistic missile at southern Najran. Saudi air defences intercepted the missile.²⁹⁷

23 April: Saudi Arabia intercepted two ballistic missiles at a Saudi Aramco oil production facility in southern Jizan.²⁹⁸

26 April: Saudi Arabia intercepted four Houthi ballistic missiles over south-western Jizan. Falling debris killed one person.²⁹⁹

6 May: Houthi rebels launched two ballistic missiles at the southern city of Najran. Saudi air defences intercepted the missiles.³⁰⁰

9 May: The Houthis fired missiles at targets in Riyadh. Saudi air defences intercepted one missile, whilst another landed in the desert south of the city.³⁰¹

14 May: Houthi rebels launched a ballistic missile at a Saudi Aramco facility in southern Jizan province. The missile landed in the desert.³⁰²

19 May: Saudi Arabia intercepted ballistic missiles from the Houthis, targeting the city of Khamis Mushait.³⁰³

10 July: Saudi Arabia intercepted a missile fired at Jizan.³⁰⁴

18 July: Saudi Arabia intercepted a missile fired at Najran.³⁰⁵

²⁹⁴ Ali Mahmood, "Saudi Arabia intercepts Houthi missile from Yemen", *The National*, 7 April 2018, <https://www.thenationalnews.com/world/mena/saudi-arabia-intercepts-houthi-missile-from-yemen-1.719396>.

²⁹⁵ "Yemen's Houthi rebels fire ballistic missile at Saudi capital", *Aljazeera*, 11 April 2018, <https://www.aljazeera.com/news/2018/4/11/yemens-houthi-rebels-fire-ballistic-missile-at-saudi-capital>.

²⁹⁶ "Saudi Arabia's air defenses intercept a Houthi missile launched on Jazan", *Arab News*, 14 April 2018, <https://www.arabnews.com/node/1284266/saudi-arabia>.

²⁹⁷ "Saudi Arabia downs Houthi missile fired across border", *Arab News*, 23 April 2018, <https://www.arabnews.com/node/1289581/saudi-arabia>.

²⁹⁸ "Saudi Arabia says it intercepted missiles fired at major oil facility by Houthis", *Haaretz*, 23 April 2018, <https://www.haaretz.com/middle-east-news/saudi-says-it-intercepted-missiles-fired-at-aramco-facility-by-houthis-1.6026600>.

²⁹⁹ "Houthi rebels vow to step up attacks on Saudi oil facilities", *Financial Times*, 29 April 2018, <https://www.ft.com/content/1c983caa-4a2b-11e8-8ae9-4b5ddcca99b3>.

³⁰⁰ "Saudi air defense units intercept two ballistic missiles fired by Houthi militia on Najran", *Arab News*, 6 May 2018, <https://www.arabnews.com/node/1297646/saudi-arabia>.

³⁰¹ Sarah Dadouch and Noah Browning, "Iran-aligned Houthis in Yemen fire missiles at Saudi capital", *Reuters*, 9 May 2018, <https://www.reuters.com/article/us-saudi-security/iran-aligned-houthis-in-yemen-fire-missiles-at-saudi-capital-idUSKBN1IA100>.

³⁰² "Yemen's Houthis fire missile at Aramco facility, Saudi says it falls in desert", *Reuters*, 14 May 2018, <https://www.reuters.com/article/us-saudi-security/yemens-houthis-fire-missile-at-aramco-facility-saudi-says-it-falls-in-desert-idUSKCN1IF136>.

³⁰³ "Saudi Arabia intercepts missile fired by Houthis in Yemen", *The National*, 20 May 2018, <https://www.thenationalnews.com/world/gcc/saudi-arabia-intercepts-missile-fired-by-houthis-in-yemen-1.731939>.

³⁰⁴ "Saudi Arabia intercepts missile launched by Houthis at Jizan Economic City", *Arab News*, 10 July 2018, <https://www.arabnews.com/node/1336586/saudi-arabia>.

³⁰⁵ "Saudi air defense intercepts, destroys Houthi ballistic missile targeting Jazan", *Alarabiya*, 19 July 2018, <https://english.alarabiya.net/News/gulf/2018/07/19/Saudi-air-defense-intercepts-destroys-Houthi-ballistic-missile-targeting-Jazan>.

19 July: Saudi Arabia intercepted a second ballistic missile fired at Jizan.³⁰⁶

6 August: Saudi Arabia intercepted a Houthi ballistic missile fired at Najran.³⁰⁷

9 August: Shrapnel from an intercepted missile fired at Jizan killed a man, and wounded 11 others.³⁰⁸

29 November: The Houthis fired Badr-1 missiles at Najran.³⁰⁹

● 2019 - 5 INCIDENTS

12 June: The Houthis launched a cruise missile against Abha Airport, injuring 26 people. Saudi Arabia accused Iran of being behind the attack.³¹⁰

19 June: The Houthis fired a missile targeting a Red Sea desalination plant at al-Shuqaiq, causing no casualties.³¹¹

25 August: The Houthis fired ten Badr-1 ballistic missiles at Jizan Airport, killing and wounding dozens. Saudi Arabia intercepted at least six missiles.³¹²

28 August: Cruise missile strike at Abha International Airport.³¹³

14 September: Abqaiq petroleum processing facilities and Khurais oil field struck by at least 19 Houthi cruise missiles and drones, including Iranian Quds-1 missile.³¹⁴

● 2020 - 15 INCIDENTS

29 January: Houthis broke a ceasefire by launching missiles at Aramco facilities. Saudi air defences intercepted the missiles.³¹⁵

21 February: Attack on Aramco and other targets in Yanbu province. The Houthis used 12 Sammad-3 drones, two Quds-1 cruise missiles, and a Zulfiqar ballistic missile. The Houthis claimed that the attack successfully hit its targets, but Saudi Arabia claimed to have intercepted the projectiles.³¹⁶

³⁰⁶ "Saudi air defense intercepts, destroys Houthi ballistic missile targeting Jazan", *Alarabiya*, 19 July 2018, <https://english.alarabiya.net/News/gulf/2018/07/19/Saudi-air-defense-intercepts-destroys-Houthi-ballistic-missile-targeting-Jazan>.

³⁰⁷ "Saudi Arabia intercepts Houthi ballistic missile targeting Najran", *Alarabiya*, 6 August 2018, <https://english.alarabiya.net/News/gulf/2018/08/06/Saudi-Arabia-intercepts-Houthi-ballistic-missile-targeting-Najran>.

³⁰⁸ "One killed and 11 wounded in Houthi missile attack on Saudi Arabia", *The National*, 9 August 2018, <https://www.thenationalnews.com/world/mena/one-killed-and-11-wounded-in-houthi-missile-attack-on-saudi-arabia-1.758276>.

³⁰⁹ Asa Fitch, "Rocket Barrage Threatens Timid Hopes for Peace in Yemen", *The Wall Street Journal*, 29 November 2018, <https://www.wsj.com/articles/rocket-barrage-threatens-timid-hopes-for-peace-in-yemen-1543537628>.

³¹⁰ Vivian Yee, "Houthi Strike Saudi Airport, Escalating Yemen Conflict", *The New York Times*, 12 June 2019, <https://www.nytimes.com/2019/06/12/world/middleeast/saudi-airport-attack.html>.

³¹¹ Stephen Kalin, "Yemen's Houthis strike Saudi utility station, coalition responds", *Reuters*, 19 June 2019, <https://www.reuters.com/article/us-yemen-security-saudi-powerstation/yemens-houthis-launch-strike-on-saudi-utility-station-no-damage-idUSKCNITK2WQ>.

³¹² "Houthis 'fire 10 ballistic missiles' at Saudi airport", *Aljazeera*, 25 August 2019, <https://www.aljazeera.com/news/2019/8/25/houthis-fire-10-ballistic-missiles-at-saudi-airport>.

³¹³ UN Panel of Experts on Yemen, "Letter dated 27 January 2020 from the Panel of Experts on Yemen addressed to the President of the Security Council", UN Security Council, 28 April 2020, <https://undocs.org/en/S/2020/326>, p.20.

³¹⁴ Michael Safi, and Julian Borger, "How did oil attack breach Saudi defences and what will happen next?", *The Guardian*, 19 September 2019, <https://www.theguardian.com/world/2019/sep/19/how-did-attack-breach-saudi-defences-and-what-will-happen-next>.

³¹⁵ Summer Said and Dion Nissenbaum, "Saudi Air Defences Thwarted Attack on Aramco", *The Wall Street Journal*, 29 January 2020, <https://www.wsj.com/articles/saudi-air-defenses-thwarted-attack-on-aramco-11580320697>.

³¹⁶ Jessica Kocan, "September 2020 Map Update: Al Houthi 'Balanced Deterrence' Campaign", *Critical Threats*, 23 September 2020, <https://www.criticalthreats.org/analysis/september-2020-map-update-al-houthi-balanced-deterrence-campaign>.

3 March: Saudi Arabia shared information with the UN regarding the “Houthi militia backed by Iran” and “an attempted terrorist attack that was planned to target an oil tanker [...] south-east of the Yemeni port of Nishtun”.³¹⁷

28 March: Saudi Arabia reported to UN how “Iran-backed Houthi militia’ launched two ballistic missiles towards civilians and civilian objects in Saudi Arabia.” E3 and Saudi Arabia claimed that the missiles were of Iranian origin.³¹⁸

28 March: Missile strike in Riyadh, and one in Jizan.³¹⁹

13 June: Missile strike in Najran.³²⁰

23 June: Houthi ballistic missile and drone attack on King Khalid Airport and Defence Ministry HQ in Riyadh.³²¹ Other missile strikes in Jizan, and one in Najran.³²²

13 August: Missile strike in Khamis Mushayt.³²³

20 August: Missile strike in Najran.³²⁴

22 August: Missile strike in Jizan.³²⁵

27 August: Missile strike in Najran.³²⁶

10 September: Houthis claimed that they attacked an “important target” in Riyadh, using a ballistic missile and drones. Saudis reported that they shot them down.³²⁷

28 October: Missile strike in Jizan. Also missile strike in Khamis Mushayt, and one in Najran.³²⁸

23 November: Houthis claimed a missile attack that set fire to an oil tanker in Jeddah.³²⁹

25 November: Same tanker was hit by a second blast.³³⁰

● 2021 - 8 INCIDENTS

23 January: Saudi air defences intercepted a missile attack over Riyadh.³³¹

³¹⁷ “Implementation of Security Council resolution 2231 (2015): Ninth report of the Secretary-General”, United Nations Security Council, 11 June 2020, <https://www.undocs.org/S/2020/531>.

³¹⁸ Ibid.

³¹⁹ UN Panel of Experts on Yemen, “Letter dated 22 January 2021 from the Panel of Experts on Yemen addressed to the President of the Security Council”, UN Security Council, 25 January 2021, https://reliefweb.int/sites/reliefweb.int/files/resources/S_2021_79_E.pdf, p.25.

³²⁰ Ibid.

³²¹ Mohammed Benmansour, “Yemen’s Houthis reach Saudi capital with missiles for first time since COVID ceasefire”, *Reuters*, 23 June 2020, <https://www.reuters.com/article/us-yemen-security-saudi/yemens-houthis-say-they-launched-missile-drone-attack-on-riyadh-idUSKBN23UOKA>.

³²² UN Panel of Experts on Yemen, “Letter dated 22 January 2021”, p.25.

³²³ Ibid.

³²⁴ Ibid.

³²⁵ Ibid.

³²⁶ Ibid.

³²⁷ “Yemen Houthis say attacked ‘important target’ in Riyadh with missile, drones”, *Reuters*, 10 September 2020, <https://www.reuters.com/article/us-yemen-security-saudi/yemen-houthis-say-they-attacked-important-target-in-riyadh-with-missile-drones-idUSKBN2611PF?il=0>.

³²⁸ UN Panel of Experts on Yemen, “Letter dated 22 January 2021”, p.25.

³²⁹ Jon Gambrell, “Yemen rebels’ missile strikes Saudi oil facility in Jiddah”, *AP*, 24 November 2020, <https://apnews.com/article/dubai-united-arab-emirates-media-summits-g-20-summit-d69e8ebca362falb89c60887016ab178>.

³³⁰ Jonathan Saul and Lisa Barrington, “Oil tanker hit by blast at Saudi terminal, Saudi Arabia confirms”, *Reuters*, 25 November 2020, <https://www.reuters.com/article/saudi-security-tanker-int-idUSKBN285217>.

³³¹ “Arab Coalition intercepts missile, drone attack targeting Saudi Arabia’s Riyadh”, *Alarabiya*, 23 January 2021, <https://english.alarabiya.net/News/gulf/2021/01/23/Arab-Coalition-intercepts-missile-drone-attack-targeting-Saudi-Arabia-s-Riyadh->

11 February: Houthi missile attack at the King Khalid Airbase.³³²

27 February: Saudi Arabia intercepted Houthi ballistic missiles.³³³

7 March: Houthis launched a Zolfaghar ballistic missile, along with several Samad-3 loitering munitions, targeting the Aramco oil facilities at Ras Tanura.³³⁴

26 March: Houthis launched rocket and drone attacks across Saudi Arabian installations, causing fires at an Aramco distribution facility in Jizan.³³⁵ Saudi air defences intercepted a ballistic missile over Najran.³³⁶

15 April: Houthis claimed that they used drones and missiles to attack Saudi Aramco, patriot anti-missile batteries, and other “sensitive facilities” in Jazan. The Saudi-led Coalition reported that the barrage had actually been aimed at civilian targets.³³⁷

1 May: Saudi defences intercepted and destroyed a “hostile air target” over Jeddah.³³⁸

2 May: Saudis intercepted a Houthi ballistic missile and suicide drone attack over Najran.³³⁹

³³² “Yemen Launches Drone Attacks on Saudi Military Targets”, *International Quran News Agency*, 13 February 2021, <https://iqna.ir/en/news/3473954/yemen-launches-drone-attacks-on-saudi-military-targets>.

³³³ “Arab coalition intercepts Houthi drones, ballistic missile attack targeting Saudi Arabia”, *Arab News*, 27 February 2021, <https://www.arabnews.com/node/1816691/saudi-arabia>.

³³⁴ Aziz El Yaakoubi and Lisa Barrington, “Learning the hard way: Saudi Arabia better prepared for latest attacks”, *Reuters*, 8 March 2021, <https://www.reuters.com/article/yemen-security-saudi-defence-int-idUSKBN2B02EO>.

³³⁵ “Houthis launch attacks on Saudi oil facilities, military sites”, *Aljazeera*, 26 March 2021, <https://www.aljazeera.com/news/2021/3/26/houthis-say-launched-attacks-on-saudi-arabian-oil-military-sites>.

³³⁶ Tamara Abueish, “Saudi Arabia’s defence forces intercept Houthi ballistic missile over Najran”, *Alarabiya*, 26 March 2021, <https://english.alarabiya.net/News/gulf/2021/03/26/Saudi-Arabia-s-defense-forces-intercept-a-ballistic-missile-heading-towards-Najran>.

³³⁷ “Houthis say they attacked Aramco, Patriot targets in Saudi Arabia”, *Aljazeera*, 15 April 2021, <https://www.aljazeera.com/news/2021/4/15/yemens-houthis-say-attacked-aramco-patriot-targets-in-jazan>.

³³⁸ “Gulf countries condemn continued Houthi attacks on Saudi Arabia”, *Arab News*, 4 May 2021, <https://www.arabnews.com/node/1853251/saudi-arabia>.

³³⁹ *Ibid.*

Annex D: Houthi drone strikes on Saudi Arabia

Below is a list of all verified instances of Houthi drone strikes against targets in Saudi Arabia since 2018 (first verified instance).

● 2018 - 2 INCIDENTS

11 April: The Saudi-led Coalition shot down two Houthi Qasif-1 drones in southern Saudi Arabia.³⁴⁰

18 November: The Houthis reported that they would halt missile and drone attacks on Saudi Arabia, in response to UN mediation efforts in Yemen.³⁴¹

● 2019 - 13 INCIDENTS

2 April: Saudi Arabia intercepted two Houthi drones launched toward Khamis Mushait. Five civilians were injured by the debris.³⁴²

8 April: Saudi Arabia intercepted a drone launched towards Asir City.³⁴³

14 May: A Houthi drone attack damaged two oil pumping stations at Arif and at Ad Dawadimi. Saudi Arabia paused oil pumping through the east-west pipeline in response to the attack.³⁴⁴

21 May: The Houthis claimed responsibility for a drone attack against Najran Airport, reportedly striking an arms depot in the airport.³⁴⁵

11 June: Two Houthi Qasf-2K drones were launched at Khamis Mushait. The drones were intercepted by Saudi air defences.³⁴⁶

20 June: Saudi Arabia reported that it intercepted a Qasf-2K drone aimed at Jizan Airport.³⁴⁷

23 June: The Houthis attacked Abha Airport with a Qasf-2K drone, killing one and wounding 21 others.³⁴⁸

30 June: Saudi Arabia reported that it intercepted two drones launched at Jizan and Asir.³⁴⁹

³⁴⁰ "Yemen's Houthi rebels fire ballistic missile at Saudi capital", *Aljazeera*, 11 April 2018, <https://www.aljazeera.com/news/2018/4/11/yemens-houthi-rebels-fire-ballistic-missile-at-saudi-capital>.

³⁴¹ Aziz El Yaakoubi, "Yemeni Houthis halt missile attacks on Saudi coalition, raising peace prospects", *Reuters*, 18 November 2018, <https://www.reuters.com/article/us-yemen-security/yemeni-houthis-halt-missile-attacks-on-saudi-coalition-raising-peace-prospects-idUSKCN1NN0SG>.

³⁴² "Saudi-led coalition says it intercepts two drones launched by Houthis: SPA", *Reuters*, 3 April 2019, <https://www.reuters.com/article/us-saudi-houthi-drones/saudi-led-coalition-says-it-intercepts-two-drones-launched-by-houthis-spa-idUSKCN1RE2ML>.

³⁴³ "Arab Coalition intercepts drone launched by Houthis toward Asir region", *Alarabiya*, 8 April 2019, <https://english.alarabiya.net/News/gulf/2019/04/08/Arab-Coalition-intercepts-drone-launched-by-Houthis-toward-Asir>.

³⁴⁴ Stephen Kalin and Rania El Gamal, "Saudi oil facilities attacked, U.S. sees threat in Iraq from Iran-backed forces", *Reuters*, 14 May 2019, <https://www.reuters.com/article/us-saudi-oil-usa-iran/saudi-oil-facilities-attacked-u-s-sees-threat-in-iraq-from-iran-backed-forces-idUSKCN1SK0YM>.

³⁴⁵ "Yemen's Houthis launch drone attack on Saudi's Najran airport: Al Masirah TV", *Reuters*, 22 May 2019, <https://www.reuters.com/article/us-saudi-security-houthi/yemens-houthis-launch-drone-attack-on-saudis-najran-airport-al-masirah-tv-idUSKCN1ISS08B>.

³⁴⁶ "Yemen's Houthi rebels launch attack drones into Saudi Arabia", *AP*, 11 June 2019, <https://apnews.com/article/96d56129049246819349bb308d44ad99>.

³⁴⁷ "Saudi Arabia shoots down Houthi drone headed towards Jazan", *Arab News*, 20 June 2019, <https://www.arabnews.com/node/1513796/saudi-arabia>.

³⁴⁸ "Yemen's Houthis hit Saudi airport, killing one, wounding 21: Saudi-led coalition", *Reuters*, 23 June 2019, <https://www.reuters.com/article/us-yemen-security/yemens-houthis-hit-saudi-airport-killing-one-expat-saudi-led-coalition-says-idUSKCN1TOOSH>.

³⁴⁹ "Saudi Arabia intercepts two Houthi drones launched into kingdom", *Aljazeera*, 30 June 2019, <https://www.aljazeera.com/news/2019/6/30/saudi-arabia-intercepts-two-houthi-drones-launched-into-kingdom>.

2 July: The Houthis conducted a drone attack against Abha Airport, wounding eight Saudis and one Indian national.³⁵⁰

5 August: The Houthis claimed that they disrupted air traffic with drone attacks on Abha and Najran Airports. A spokesperson for the Coalition denied either airport had been hit.³⁵¹

17 August: A reported Houthi drone attack on the Saudi oil field at Shaybah.³⁵²

26 August: The Houthis reportedly hit a military target in Riyadh with an armed drone; Saudi Arabian officials denied that the attack occurred.³⁵³

14 September: Abqaiq petroleum processing facilities and Khurais oil field struck by at least 19 Houthi cruise missiles and drones, including Iranian Quds-1 missile.³⁵⁴

● 2020 - 11 INCIDENTS

26 March: Drone strike at Khamis Mushayt.³⁵⁵

27 May: Drone strike at Najran.³⁵⁶

1 June: Drone strike at Khamis Mushayt.³⁵⁷

15 June: Strike at Khamis Mushayt.³⁵⁸

23 June: Houthi drone and ballistic missile attack on King Khalid Airport and Defence Ministry HQ in Riyadh.³⁵⁹ Further strikes at Abha, Najran, and at Jizan.³⁶⁰

13 August: Strike at Khamis Mushayt.³⁶¹

20 August: Strike at Najran.³⁶²

6 September: Strike at Abha.³⁶³

10 September: Houthis reported that they attacked an “important target” in Riyadh, using a ballistic missile and drones. Saudi Arabia reported that it shot them down.³⁶⁴

³⁵⁰ Chandler Thornton and Nada Altaher, “Rebels launch drone attack on Saudi airport, injuring 9”, *CNN*, 2 July 2019, <https://edition.cnn.com/2019/07/02/middleeast/saudi-abha-airport-drone-attack-intl/index.html>.

³⁵¹ “Yemen’s Houthis Launch Drone Strike On Saudi Air Base, Military Spokesman Says”, *Haaretz.com*, 6 August 2019, <https://www.haaretz.com/middle-east-news/yemen-s-houthis-launch-drone-strike-on-saudi-air-base-military-spokesman-says-1.7643110>.

³⁵² “Drone attack by Yemen rebels sparks fire in Saudi oil field”, *Aljazeera*, 17 August 2019, <https://www.aljazeera.com/economy/2019/8/17/drone-attack-by-yemen-rebels-sparks-fire-in-saudi-oil-field>.

³⁵³ “Houthis claim attack on military target in Saudi capital Riyadh”, *Aljazeera*, 26 August 2019, <https://www.aljazeera.com/news/2019/8/26/houthis-claim-attack-on-military-target-in-saudi-capital-riyadh>.

³⁵⁴ Michael Safi and Julian Borger, “How did oil attack breach Saudi defence and what will happen next?”, *The Guardian*, 19 September 2019, <https://www.theguardian.com/world/2019/sep/19/how-did-attack-breach-saudi-defences-and-what-will-happen-next>.

³⁵⁵ UN Panel of Experts on Yemen, “Letter dated 22 January 2021 from the Panel of Experts on Yemen addressed to the President of the Security Council”, 25 January 2021, https://reliefweb.int/sites/reliefweb.int/files/resources/S_2021_79_E.pdf, p.25.

³⁵⁶ *Ibid.*

³⁵⁷ *Ibid.*

³⁵⁸ *Ibid.*

³⁵⁹ Mohammed Benmansour, “Yemen’s Houthis reach Saudi capital with missiles for first time since COVID ceasefire”, *Reuters*, 23 June 2020, <https://www.reuters.com/article/us-yemen-security-saudi/yemens-houthis-say-they-launched-missile-drone-attack-on-riyadh-idUSKBN23UOKA>.

³⁶⁰ UN Panel of Experts on Yemen, “Letter dated 22 January 2021”, p.25.

³⁶¹ *Ibid.*

³⁶² *Ibid.*

³⁶³ *Ibid.*

³⁶⁴ “Yemen Houthis say attacked ‘important target’ in Riyadh with missile, drones”, *Reuters*, 10 September 2020, <https://www.reuters.com/article/us-yemen-security-saudi/yemen-houthis-say-they-attacked-important-target-in-riyadh-with-missile-drones-idUSKBN2611PF?il=0>.

17 September: Strike at Khamis Mushayt.³⁶⁵

8 December: Saudi air defence destroyed a Houthi drone.³⁶⁶

● **2021 – 28 INCIDENTS**

15 January: Saudi defences intercepted three Houthi “suicide drones”.³⁶⁷

10 February: Drone strike at Abha International Airport.³⁶⁸

10 February: Houthi drone strike on Abha International Airport damaged a civilian airliner.³⁶⁹

12 February: Houthis claimed that three Qasef-2K drones hit military targets at Abha International Airport and King Khalid Airbase.³⁷⁰

13 February: A further drone attack on Abha intercepted.³⁷¹

15 February: Houthis claimed to have struck two Saudi airports in drone strikes.³⁷²

27 February: Saudi Arabia intercepted Houthi drones and ballistic missiles.³⁷³

7 March: Houthi drone strike on a Saudi oil facility at Ras Tanura was intercepted.³⁷⁴

19 March: Houthis claimed a drone strike at Riyadh oil refinery, causing a fire.³⁷⁵

20 March: Saudi air defences intercepted a Houthi suicide drone at Khamis Mushait.³⁷⁶

22 March: Houthi attack at Abha International Airport using Qaef-2K drone.³⁷⁷

26 March:

- Houthi forces launched rocket and drone attacks across Saudi Arabia installations causing fires at an Aramco distribution facility in Jizan.³⁷⁸

³⁶⁵ UN Panel of Experts on Yemen, “Letter dated 22 January 2021”, p.25.

³⁶⁶ “Saudi-Led coalition destroys Houthi drone - Saudi state TV”, *Reuters*, 8 December 2020, <https://www.reuters.com/article/saudi-security-houthi-int-idUSKBN2813C3>.

³⁶⁷ “Arab coalition intercepts, destroys Houthi drones targeting Saudi Arabia”, *Arab News*, 15 January 2021, <https://www.arabnews.com/node/1793126/saudi-arabia>.

³⁶⁸ “Yemen Launches Drone Attacks on Saudi Military Targets”, *International Quran News Agency*, 13 February 2021, <https://iqna.ir/en/news/3473954/yemen-launches-drone-attacks-on-saudi-military-targets>.

³⁶⁹ Thomas Newdick, “Yemen’s Houthi Rebels Strike Airliner In New Drone Attack On Saudi Airport”, *The Drive*, 10 February 2021, <https://www.thedrive.com/the-war-zone/39186/yemens-houthi-rebels-strike-airliner-in-new-drone-attack-on-saudi-airport>.

³⁷⁰ Ibid.

³⁷¹ “Saudi Arabia says it foiled Houthi drone attack on Abha airport”, *Aljazeera*, 13 February 2021, <https://www.aljazeera.com/news/2021/2/13/saudi-arabia-says-it-foiled-houthi-drone-attack-on-abha-airport>.

³⁷² “Yemen’s Houthis say they have struck Saudi’s Jeddah, Abha airports with drones”, *Reuters*, 15 February 2021, <https://www.reuters.com/article/us-saudi-security-yemen/yemens-houthis-say-they-have-struck-saudis-jeddah-abha-airports-with-drones-idUSKBN2AFOX1?il=0>.

³⁷³ “Arab coalition intercepts Houthi drones, ballistic missile attack targeting Saudi Arabia”, *Arab News*, 27 February 2021, <https://www.arabnews.com/node/1816691/saudi-arabia>.

³⁷⁴ Anthony Di Paola, Vivian Nereim, Javier Blas and Sylvia Westall, “Saudi Arabian Oil Site Attacked, Stoking Regional Tensions”, *Bloomberg*, 7 March 2021, <https://www.bloomberg.com/news/articles/2021-03-07/saudi-coalition-intercepts-five-drones-from-yemen-pursuing-more>.

³⁷⁵ Lisa Barrington, “Drone strike on Riyadh oil refinery claimed by Houthis causes fire”, *Reuters*, 19 March 2021, <https://www.reuters.com/article/us-saudi-security-yemen/yemens-houthis-say-drone-attack-hits-saudi-aramco-in-riyadh-idUSKBN2BB1CM>.

³⁷⁶ “Saudi-led coalition pounds Houthi military sites in Sanaa, say residents”, *The Economic Times*, 21 March 2021, <https://economictimes.indiatimes.com/news/international/saudi-arabia/saudi-led-coalition-pounds-houthi-military-sites-in-sanaa-say-residents/articleshow/81613875.cms?from=mdr>.

³⁷⁷ “Houthis claim drone attack on Saudi Abha Airport”, *Anadolu Agency*, 23 March 2021, <https://www.aa.com.tr/en/middle-east/houthis-claim-drone-attack-on-saudi-abha-airport/2185624>.

³⁷⁸ “Houthis launch attacks on Saudi oil facilities, military sites”, *Aljazeera*, 26 March 2021, <https://www.aljazeera.com/news/2021/3/26/houthis-say-launched-attacks-on-saudi-arabian-oil-military-sites>.

- Saudis intercepted eight suicide drones at Khamis Mushait, Najran and Jizan.³⁷⁹
- Saudis intercepted ballistic missile over Najran.³⁸⁰

27 March: Saudis intercepted Houthi suicide drone over Khamis Mushait.³⁸¹

28 March: Saudis intercepted three Houthi drones and two boats full of explosives near Khamis Mushait.³⁸²

30 March: Saudis intercepted three Houthi suicide drones.³⁸³

1 April: Houthis claimed a successful drone attack in Riyadh.³⁸⁴ In addition, two Qasef-2K drones were used to strike King Khalid Airbase at Khamis Mushayt.³⁸⁵

1 April: Saudis intercepted two Houthi suicide drones over Khamis Mushait.³⁸⁶

6 April: Saudis intercepted Houthi suicide drone over Khamis Mushait.³⁸⁷

8 April: Houthis claim successful Qasef-2K attack at King Khalid Airbase at Khamis Mushayt. Saudi Arabia reported that the drones were intercepted.³⁸⁸

9 April: Houthis claimed a successful Qasef-2K attack at Jizan Airport.³⁸⁹

12 April: Houthis claimed a drone attack on Saudi Aramco facilities in Jeddah and Jubail.³⁹⁰

15 April: Houthis reported that they used drones and missiles to attack Saudi Aramco, patriot anti-missile batteries and other “sensitive facilities” in Jazan. The Saudi-led Coalition reported that the barrage had actually been aimed at civilian targets.³⁹¹

23 April: A Houthi drone strike targeted King Khalid Airbase and a Saudi Aramco facility in Jizan.³⁹²

³⁷⁹ Ismaeel Naar, “Saudi Arabia intercepts, destroys 8 explosive Houthi drones targeting civilian areas”, *Alarabiya News*, 25 March 2021, <https://english.alarabiya.net/News/gulf/2021/03/25/Terrorism-Saudi-Arabia-intercepts-destroys-five-explosive-Houthi-drones-targeting-civilian-are>.

³⁸⁰ Tamara Abueish, “Saudi Arabia’s defense forces intercept Houthi ballistic missile over Najran”, *Alarabiya News*, 26 March 2021, <https://english.alarabiya.net/News/gulf/2021/03/26/Saudi-Arabia-s-defense-forces-intercept-a-ballistic-missile-heading-towards-Najran>.

³⁸¹ “Coalition says shoot down Houthi drone in west of Saudi Arabia”, *Debrief*, 27 March 2021, <https://debrief.net/en/news-24070.html>.

³⁸² “Saudi-led coalition destroys Houthi rigged boats, drones – state media”, *Reuters*, 28 March 2021, <https://www.reuters.com/article/us-yemen-security-idUSKBN2BK03H>.

³⁸³ “Saudi coalition shoots down two Houthi drones”, *Debrief*, 30 March 2021, <https://debrief.net/en/news-24152.html>.

³⁸⁴ “Yemen’s Houthis say they launched drone attacks on Saudi capital”, *Aljazeera*, 1 April 2021, <https://www.aljazeera.com/news/2021/4/1/yemens-houthis-say-attacked-saudi-capital-riyadh-with-four-drone>.

³⁸⁵ “Yemen Launches Drone Strike on Saudi Air Base”, *Tasnim News Agency*, 2 April 2021, <https://www.tasnimnews.com/en/news/2021/04/02/2477672/yemen-launches-drone-strike-on-saudi-air-base>.

³⁸⁶ “Arab coalition destroys 2 Houthi drones fired toward Saudi Arabia’s Khamis Mushait”, *Arab News*, 1 April 2021, <https://www.arabnews.com/node/1835986/saudi-arabia>.

³⁸⁷ “Saudi Arabia: Saudi Air Defense Forces intercept alleged Al-Houthi weaponized drone targeting Khamis Mushait April 6”, *Garda World*, 6 April 2021, <https://www.garda.com/crisis24/news-alerts/464056/saudi-arabia-saudi-air-defense-al-houthi-intercept-alleged-al-houthi-weaponized-drone-targeting-khamis-mushait-april-6>.

³⁸⁸ “Yemeni Forces Conduct Another Retaliatory Drone Attack on Saudi Airbases”, *Tasnim News Agency*, 9 April 2021, <https://www.tasnimnews.com/en/news/2021/04/09/2481507/yemeni-forces-conduct-another-retaliatory-drone-attack-on-saudi-airbases>.

³⁸⁹ *Ibid.*

³⁹⁰ “Yemen’s Houthi rebels claim attacks on Saudi oil facilities”, *Aljazeera*, 12 April 2021, <https://www.aljazeera.com/news/2021/4/12/yemens-houthi-rebels-claim-strikes-on-saudi-oil-plants>.

³⁹¹ “Houthis say they attacked Aramco, Patriot targets in Saudi Arabia”, *Aljazeera*, 15 April 2021, <https://www.aljazeera.com/news/2021/4/15/yemens-houthis-say-attacked-aramco-patriot-targets-in-jazan>.

³⁹² “Yemen’s Houthis claim attack on Saudi oil facility, air base”, *Reuters*, 23 April 2021, <https://www.reuters.com/world/middle-east/saudi-led-coalition-intercepted-houthi-explosives-laden-drone-state-tv-2021-04-22/>.

25 April: Houthis launched a drone attack on King Khalid Airbase.³⁹³

26 April: Houthis launched a further drone attack on King Khalid Airbase.³⁹⁴

28 April: Saudi air defences intercepted a drone attack over an airbase in Khamis Mushait.³⁹⁵

1 May: Saudi air defences intercepted and destroyed a “hostile air target” over Jeddah.³⁹⁶

2 May: Saudi air defences intercepted a Houthi ballistic missile and suicide drone attack over Najran.³⁹⁷

³⁹³ “Saudi-led coalition says it has destroyed Houthi armed drone”, *Reuters*, 25 April 2021, <https://www.reuters.com/world/middle-east/saudi-led-coalition-destroys-houthi-explosives-laden-drone-state-tv-2021-04-24/>.

³⁹⁴ Tong Ong, “Houthis Launch Drone Attack on Saudi Military Base, Says Spokesman”, *The Defense Post*, 26 April 2021, <https://www.thedefensepost.com/2021/04/26/houthis-drone-attack-saudi-base/>.

³⁹⁵ “Yemen’s Houthis say fired drone at southern Saudi air base”, *Reuters*, 28 April 2021, <https://www.reuters.com/world/middle-east/yemens-houthis-say-fired-drone-southern-saudi-air-base-2021-04-28/>.

³⁹⁶ “Gulf countries condemn continued Houthis attacks on Saudi Arabia”, *Arab News*, 4 May 2021, <https://www.arabnews.com/node/1853251/saudi-arabia>.

³⁹⁷ *Ibid.*

Annex E: Iraqi militia attacks on Coalition forces

● 2017 - 1 INCIDENT

1 October: A US soldier was killed, and one other wounded by an explosively formed projectile. US officials blamed Iranian-backed militia.³⁹⁸

● 2018 - 2 INCIDENTS

8 September: A rocket attack on the US embassy in Baghdad and consulate in Basra. No casualties. The US Government blamed Iranian forces.³⁹⁹

27 December: Two 107 mm rockets targeted the US embassy complex a day after President Trump visited al-Asad Airbase in Anbar.⁴⁰⁰

● 2019 - 15 INCIDENTS

2 February: Iraqi forces acting on US intelligence foiled an attack to fire three 122 mm Iranian rockets at American facilities in Anbar.⁴⁰¹

12 February: Three Iranian 107 mm rockets were fired at US facilities in Nineveh. Members of an unspecified Iranian-backed militia were arrested.⁴⁰²

1 May: Two Iranian 107 mm rockets were fired at the Taji military training complex, where US personnel were located. Two members of the Iranian proxy group Asaib Ahl al-Haq (AAH) were arrested.⁴⁰³

19 May: Iraqi Shia militias fired a missile over the international zone in Baghdad. The missile narrowly missed the US embassy.⁴⁰⁴

15 June: Mortar attack on Balad Airbase where American trainers were present. No casualties.⁴⁰⁵

17 June: Rocket attack on Coalition training facilities in Taji. No casualties.⁴⁰⁶

18 June: Rocket attack on Coalition training facilities in Mosul. No casualties.⁴⁰⁷

19 June: An Iranian-backed Shia militia fired a rocket towards oil infrastructure in Basra province. The rocket landed 91 metres from the accommodation facilities used by US and international engineers.⁴⁰⁸

³⁹⁸ Michael Knights, "Responding to Iranian Harassment of U.S. Facilities in Iraq", *The Washington Institute for Near East Policy*, 21 May 2019, <https://www.washingtoninstitute.org/policy-analysis/responding-iranian-harassment-us-facilities-iraq>.

³⁹⁹ Michael R. Gordon, "White House Blames Iranian-Backed Militias for Attacking U.S. Facilities in Iraq", *The Wall Street Journal*, 11 September 2018, https://www.wsj.com/articles/white-house-blames-iranian-backed-militias-for-attacking-u-s-facilities-in-iraq-1536707458?mod=hp_listb_pos1.

⁴⁰⁰ Michael Knights, "Responding to Iranian Harassment of U.S. Facilities in Iraq".

⁴⁰¹ Ibid.

⁴⁰² Ibid.

⁴⁰³ Ibid.

⁴⁰⁴ Ibid.

⁴⁰⁵ "Mortar Attack on Iraqi Base Home to US Troops; no Casualties", VOA, 15 June 2019, <https://www.voanews.com/middle-east/mortar-attack-iraqi-base-home-us-troops-no-casualties>.

⁴⁰⁶ Michael Knights, "Iran-Backed Militias Test the Credibility of Iraq's Prime Minister", *The Washington Institute for Near East Policy*, 19 June 2019, <https://www.washingtoninstitute.org/policy-analysis/iran-backed-militias-test-credibility-iraqs-prime-minister>.

⁴⁰⁷ Ibid.

⁴⁰⁸ Ibid.

30 October: Two Katyusha rockets fired into Baghdad's Green Zone, landing 100 metres away from the US Embassy. One Iraqi soldier was killed. ⁴⁰⁹

8 November: 31 Iranian 107 mm rockets were fired at US forces at the Qayyarah West Airfield base. There were no reported injuries. ⁴¹⁰

3 December: 122 mm rockets were launched at the al-Asad base in western Anbar province. No casualties were reported. ⁴¹¹

9 December: A US Army complex next to Baghdad International Airport hosting US forces was hit by several rockets, wounding six Iraqi troops. ⁴¹²

27 December: Kata'ib Hezbollah launched a rocket attack at an Iraqi military base in Kirkut. One US contractor was killed, and four US soldiers wounded. ⁴¹³

30 December: US officials claimed that there had been 11 attacks on bases containing Coalition personnel in the previous two months. They blamed Kata'ib Hezbollah. ⁴¹⁴

31 December: Kata'ib Hezbollah-organised PMF leaders in a siege on the US embassy in Baghdad. No US casualties were reported. ⁴¹⁵

● 2020 - 22 INCIDENTS

5 January: Rockets launched at the US embassy and Balad Airbase during the funeral of General Soleimani. No casualties. ⁴¹⁶

8 January: Operation "Martyr Soleimani", in which Iran launched over a dozen missiles at two bases housing US troops in Iraq. Over 100 troops reported traumatic brain injuries. ⁴¹⁷

8 January: Ukrainian Airlines flight 752 was shot down by Iran, killing all 176 people on board. An Iranian officer mistook it for an American missile. ⁴¹⁸ The Iranian Government was quick to deny involvement in this before eventually relenting under enormous international pressure. ⁴¹⁹

26 January: The US embassy in Baghdad was hit by rockets. US officials blamed Iranian proxies. One person was injured. ⁴²⁰

⁴⁰⁹ Ellen Ioanes and John Haltiwanger, "The US Embassy in Iraq was close being struck in a rocket attack that killed 1 Iraqi soldier", *Insider*, 30 October 2019, <https://www.businessinsider.com/rocket-attacks-on-baghdad-green-zone-100-yards-from-embassy-2019-10?r=US&IR=T>.

⁴¹⁰ Jane Arraf, "U.S. Military Official Warns Of Dangerous Escalation In Iran-Backed Attacks In Iraq", *NPR*, 12 December 2019, <https://www.npr.org/2019/12/12/787377987/u-s-military-official-warns-of-dangerous-escalation-in-iran-backed-attacks-on-ir>.

⁴¹¹ Jane Arraf, "U.S. Military Official Warns Of Dangerous Escalation".

⁴¹² "Rockets Hit Base Near Baghdad Airport, Six Wounded", *Radio Liberty*, 9 December 2019, <https://www.rferl.org/a/rockets-hit-base-near-baghdad-airport-six-wounded/30315467.html>.

⁴¹³ Michael R. Gordon, "Rocket Attack in Iraq Kills U.S. Contractor, Wounds Four U.S. Troops", *The Wall Street Journal*, 28 December 2019, <https://www.wsj.com/articles/rocket-attack-in-iraq-kills-u-s-contractor-wounds-four-u-s-troops-11577492632>.

⁴¹⁴ Julian Borger, "US: strikes on Iran-backed militia a response to 'campaign' of attacks by Tehran", *The Guardian*, 30 December 2019, <https://www.theguardian.com/world/2019/dec/30/us-airstrikes-iran-tehran-militia-iraq>.

⁴¹⁵ Qassim Abdul-Zahra, "Protesters attack US Embassy in Baghdad after airstrikes", *AP*, 1 January 2020, <https://apnews.com/article/75228a8a607a44863b57021ac33264dc>.

⁴¹⁶ "Qasem Soleimani: Blasts hit Baghdad area as Iraqis mourn Iranian general", *BBC News*, 5 January 2020, <https://www.bbc.co.uk/news/world-middle-east-50995792>.

⁴¹⁷ Idrees Ali and Phil Stewart, "More than 100 U.S. troops diagnosed with brain injuries from Iran attack", *Reuters*, 10 February 2020, <https://www.reuters.com/article/us-usa-pentagon-tbi-exclusive/exclusive-more-than-100-u-s-troops-diagnosed-with-brain-injuries-from-iran-attack-officials-idUSKBN2041ZK>.

⁴¹⁸ Nasser Karimi and Joseph Krauss, "Under pressure, Iran admits it shot down jetliner by mistake", *AP*, 12 January 2020, <https://apnews.com/article/21f4a92a2dfbc38581719664bdf6f38e>.

⁴¹⁹ "Iran denies missile downed plane, calls for data", *CNBC*, 10 January 2020, <https://www.cnbc.com/2020/01/10/iran-denies-missile-downed-plane-calls-for-data.html>.

⁴²⁰ "US embassy in Iraq hit by rocket attack, wounding at least one", *The Guardian*, 27 January 2020, <https://www.theguardian.com/world/2020/jan/27/us-embassy-iraq-rocket-attack-injuries>.

11 March: 30 rockets were fired at the Taji military camp hosting Coalition troops. One British soldier and two Americans were killed. Kata'ib Hezbollah was widely blamed for the attack.⁴²¹

14 March: 33 rockets were fired at the military base at Taji, injuring three American and two Iraqi service personnel. US officials stated that the strike was launched by Kata'ib Hezbollah.⁴²²

17 March: Two rockets struck a training base south of Baghdad, where US-led Coalition troops and NATO trainers were present.⁴²³ US officials blamed Kata'ib Hezbollah.

6 April: Three rockets hit near the site of an American oilfield service company in southern Iraq without causing any damage or casualties.⁴²⁴

9 June: A rocket struck within the grounds of Baghdad International Airport – where US forces were deployed – in yet another attack against Coalition interests in Iraq. Security officials said that the rocket caused no casualties or damage.⁴²⁵

5 July: Two rockets were fired at the US embassy, and at military installations across Baghdad. An Iraqi child was wounded.⁴²⁶

24 July: Four Katyusha rockets were fired at a Coalition base at Besmaya, suspected to be from Iranian-controlled Shia militias.⁴²⁷

27 July: At least three Katyusha rockets hit Taji military base, housing US forces near Baghdad.⁴²⁸

29 July: US Camp Victory Base at Baghdad International Airport was targeted by rockets. No casualties were reported.⁴²⁹

July 2020: Aljazeera reported 39 rocket attacks in the period from October 2019.⁴³⁰

15 August: Two Katyusha rockets launched at Camp Taji base from Baghdad.⁴³¹

15 September: Three separate attacks, without casualties:⁴³²

- An improvised explosive device targeted a British embassy vehicle in Baghdad.

⁴²¹ "K soldier and two Americans killed in rocket attack in Iraq", *BBC News*, 12 March 2020, <https://www.bbc.co.uk/news/world-middle-east-51842744>.

⁴²² "Iraq base attack: Coalition and Iraqi troops hurt as Taji targeted again", *BBC News*, 14 March 2020, <https://www.bbc.co.uk/news/world-middle-east-51890492>.

⁴²³ "Rockets target Iraqi base hosting foreign troops", *Aljazeera*, 17 March 2020, <https://www.aljazeera.com/news/2020/3/17/rockets-target-iraqi-base-hosting-foreign-troops>.

⁴²⁴ "Rockets target US oil company site in southern Iraq", *Aljazeera*, 6 April 2020, <https://www.aljazeera.com/news/2020/4/6/rockets-target-us-oil-company-site-in-southern-iraq>.

⁴²⁵ "Rocket hits Baghdad airport in another attack on US forces", *Aljazeera*, 9 June 2020, <https://www.aljazeera.com/news/2020/6/9/rocket-hits-baghdad-airport-in-another-attack-on-us-forces>.

⁴²⁶ "Iran-backed armed group denies Iraq rocket attack on US interests", *Aljazeera*, 5 July 2020, <https://www.aljazeera.com/news/2020/7/5/iran-backed-armed-group-denies-iraq-rocket-attack-on-us-interests>.

⁴²⁷ "Rockets hit Iraqi base used by Coalition troops, no casualties", *Al-Monitor*, 24 July 2020, <https://www.al-monitor.com/originals/2020/07/rockets-base-iraq-besmaya-coalition-kataib-hezbollah.html>.

⁴²⁸ "Iraqi army aircraft damaged in rocket attack on camp Taji", *Al-Monitor*, 27 July 2020, <https://www.al-monitor.com/originals/2020/07/iraq-army-aircraft-damage-rocket-attack-camp-taji.html>.

⁴²⁹ Zehra Nur Duz, "Iraqi military base housing US forces attacked", *Anadolu Agency*, 29 July 2020, <https://www.aa.com.tr/en/middle-east/iraqi-military-base-housing-us-forces-attacked/1925565>.

⁴³⁰ "Iraq: Five civilians killed in Baghdad rocket attack", *Aljazeera*, 28 September 2020, <https://www.aljazeera.com/news/2020/9/28/iraq-five-civilians-killed-in-baghdad-rocket-attack#:~:text=Iraqi%20armed%20groups%20fired%20two,attack%20led%20to%20civilian%20casualties>.

⁴³¹ "Iraq: Reports of rocket fire targeting Camp Taji August 15", *Garda World*, 15 August 2020, <https://www.garda.com/crisis24/news-alerts/369421/iraq-reports-of-rocket-fire-targeting-camp-taji-august-15>.

⁴³² "3 Western targets in Iraq attacked in 24 hours", *Daily Sabah*, 15 September 2020, <https://www.dailysabah.com/world/mid-east/3-western-targets-in-iraq-attacked-in-24-hours>.

- Two rockets were fired at the US embassy in Baghdad.
- Two improvised explosive devices hit a Coalition convoy.

28 September: A rocket attack on the US military base at Baghdad International Airport killed five civilians. ⁴³³

1 October: A rocket attack on the Coalition base in Erbil. ⁴³⁴

17 November: A rocket attack on the US embassy in Baghdad. One civilian was reportedly killed. ⁴³⁵

10 December: Two convoys transporting logistical equipment for the US-led Coalition helping Iraqi troops fight armed groups were targeted with roadside bombs. ⁴³⁶ No injuries were reported. ⁴³⁷

20 December: Eight rockets struck the US Embassy in Baghdad. One Iraqi security personnel was injured. ⁴³⁸

21 December: A US military convoy struck an IED. Iranian-supported militia Saraya Qassem al-Jabbarin claimed responsibility. ⁴³⁹

● 2021 - 12 INCIDENTS

15 February: 14 107 mm rockets were fired at the Coalition military base in Erbil. One non-US contractor was killed and nine others injured. The attack was claimed by the Iranian proxy militia Saraya Awliya al-Dam. ⁴⁴⁰

20 February: At least four rockets struck Balad Airbase, housing US forces. A South African civilian contractor was injured. Saraya Awliya al-Dam - linked to Kata'ib Hezbollah - claimed responsibility. ⁴⁴¹

3 March: At least ten rockets were launched at al-Asad Airbase, hosting Coalition forces. No casualties were reported. US officials blamed Iranian-linked militias. ⁴⁴²

15 March: Seven rockets targeted al-Balad Airbase, housing Coalition troops north of Baghdad. No casualties were reported. ⁴⁴³

⁴³³ "Iraq: Five civilians killed in Baghdad rocket attack", *Aljazeera*, 28 September 2020, <https://www.aljazeera.com/news/2020/9/28/iraq-five-civilians-killed-in-baghdad-rocket-attack#:~:text=Iraqi%20armed%20groups%20fired%20two,attack%20led%20to%20civilian%20casualties>.

⁴³⁴ "U.S. military base housing Canadian troops in Iraq attacked", *Global News*, 1 October 2020, <https://globalnews.ca/news/7371534/canadian-forces-iraq-us-base-attacked/>.

⁴³⁵ "Eight rockets target US embassy in Baghdad: Iraq army", *Aljazeera*, 20 December 2020, <https://www.aljazeera.com/news/2020/12/20/iraqi-army-8-rockets-target-us-embassy-in-baghdad>.

⁴³⁶ Ibid.

⁴³⁷ "Two roadside bombs hit US-led coalition convoys in Baghdad, central Iraq", *ParsToday*, 26 February 2021, https://parstoday.com/en/news/west_asia-i135526-two_roadside_bombs_hit_us_led_coalition_convoys_in_baghdad_central_iraq.

⁴³⁸ "Eight rockets target US embassy in Baghdad: Iraq army", *Aljazeera*.

⁴³⁹ "Iraq: Supply convoy for US-led forces struck by IED in Babil Governorate, Dec. 21", *GardaWorld*, 21 December 2020, <https://www.garda.com/crisis24/news-alerts/418811/iraq-supply-convoy-for-us-led-forces-struck-by-ied-in-babil-governorate-dec-21>.

⁴⁴⁰ Bethan McKernan and Julian Borger, "Rocket attack on US airbase in Iraq kills civilian contractor", *The Guardian*, 16 February 2021, <https://www.theguardian.com/world/2021/feb/16/rocket-attack-us-airbase-iraq-kills-civilian-contractor>.

⁴⁴¹ Qassim Abdul-Zahra, "Iraqi officials: Rockets strike north air base, one injured", *AP*, 20 February 2021, <https://apnews.com/article/baghdad-iraq-middle-east-4f1c7e336cc1e20fa16cc6564083b047>.

⁴⁴² Jane Arraf and Helene Cooper, "Rockets Hit Iraqi Base Where U.S. Troops Are Stationed", *The New York Times*, 3 March 2021, <https://www.nytimes.com/2021/03/03/world/middleeast/iraq-base-rocket-attack.html>.

⁴⁴³ "7 rockets target Iraq base housing US troops; 5 hit nearby village", *The Times of Israel*, 15 March 2021, <https://www.timesofisrael.com/7-rockets-target-iraq-base-housing-us-troops-5-hit-nearby-village/>.

4 April: Two rockets landed near K1 Airbase, housing US troops. This was the 14th such attack since President Biden's inauguration 12 weeks previously.⁴⁴⁴

14 April: Drone attack on US forces stationed at Erbil Airport. In addition, a rocket attack on a nearby base killed a Turkish soldier.⁴⁴⁵

18 April: Five rockets were fired at Balad Airbase, wounding two foreign contractors and three Iraqi soldiers, after hitting facilities used by the US company Sallyport.⁴⁴⁶

22 April: At least three rockets struck Baghdad International Airport.⁴⁴⁷

2 May: Two rockets were fired at Baghdad International Airport, targeting accommodation for Coalition troops.⁴⁴⁸

3 May: Three to six rockets fell on Balad Airbase, housing US contractors.⁴⁴⁹

4 May: The US Department of Defense revealed that contractors from Lockheed Martin had been forced to temporarily withdraw from Balad Airbase in March 2021, citing security fears.⁴⁵⁰

4 May: Two rockets fell on Ain Al-Asad Airbase, housing US contractors.⁴⁵¹

⁴⁴⁴ "Two rockets hit near Iraq air base hosting US soldiers", *Arab News*, 4 April 2021, <https://www.arabnews.com/node/1837341/middle-east>.

⁴⁴⁵ "Explosives-laden drone targets U.S. forces at Iraq's Erbil airport", *Reuters*, 14 April 2021, <https://www.reuters.com/world/middle-east/rocket-hits-near-erbil-airport-northern-iraq-kurdish-security-officials-2021-04-14/>.

⁴⁴⁶ Seth J. Frantzman, "Iranian-backed rocket attacks on US increase in Iraq", *The Jerusalem Post*, 5 May 2021, <https://www.jpost.com/middle-east/iranian-backed-rocket-attacks-on-us-increase-in-iraq-667205>.

⁴⁴⁷ "Iraqi military: 3 rockets strike close to Baghdad airport", *Arab News*, 22 April 2021, <https://www.arabnews.com/node/1847401/middle-east>.

⁴⁴⁸ Seth J. Frantzman, "Iranian-backed rocket attacks on US increase in Iraq".

⁴⁴⁹ Ibid.

⁴⁵⁰ "Lead Inspector General for Operation Inherent Resolve Quarterly Report to the United States Congress | January 1, 2021 - March 31, 2021", Department of Defense Office of Inspector General, 30 April 2021, <https://www.dodig.mil/Reports/Lead-Inspector-General-Reports/Article/2594393/lead-inspector-general-for-operation-inherent-resolve-quarterly-report-to-the-u/>, last visited: 5 May 2021.

⁴⁵¹ Seth J. Frantzman, "Iranian-backed rocket attacks on US increase in Iraq".

Annex F: Iranian arms violations under UNSC Resolution 2231

● 2016 - 6 INCIDENTS

5–8 March: Several Iranian entities participated in the Fifth Iraq Defence Exhibition, held from 5 to 8 March at the Baghdad International Fairground. “Such an arms transfer from the Islamic Republic of Iran to Iraq should have required prior approval from the Security Council under Resolution 2231” – UN Secretary General.⁴⁵²

28 March: The Combined Maritime Forces announced the seizure of a weapons cache off the coast of Oman. This consisted of: 1989 AK-47 assault rifles, 100 RPG-7 rocket-propelled grenade launchers, 49 PKM general purpose machine guns, 39 PKM spare barrels and twenty 60 mm mortar tubes. US officials claimed that it was Iranian, in contravention of Resolution 2231.⁴⁵³

7 June: The US reported to the UN that it had seized an arms shipment from Iran, likely bound for Yemen. This included 1500 Kalashnikov rifles, 200 RPG-7 rocket-propelled grenade launchers, and 21 DshK 12.7 mm machine guns, in breach of the arms embargo provisions of Resolution 2231.⁴⁵⁴

24 June: The Secretary-General of Hezbollah stated that the budget of Hezbollah, its salaries, expenses, weapons and missiles, all came from Iran. The transfers of arms and related material from Iran to Hezbollah are violations of Resolution 2231.⁴⁵⁵

5 July: France reported to the UN “the seizure of an arms shipment that, in its assessment, had originated in Iran and was likely bound for Somalia or Yemen... included 2,000 AK-47 assault rifles, 64 Hoshdar-M sniper rifles, 6 type-73 machine guns and 9 Kornet anti-tank missiles” in contravention of Resolution 2231.⁴⁵⁶

21 November: Israel reported to the UN that “Iran continues to transfer arms and related material to Hizbullah in order to supply Hizbullah with the capacity to enhance its missile arsenal”.⁴⁵⁷ This is in breach of UNSC Resolution 2231.

● 2017 - 8 INCIDENTS

20 January: “Ukraine announced the discovery of 17 boxes containing missile system components and aircraft parts without accompanying documents in a cargo plane in Kyiv bound for the Islamic Republic of Iran” in an apparent breach of Resolution 2231.⁴⁵⁸

18 February: Yemen reported to the UN “the seizure of considerable quantities of weapons and ammunition that, in the assessment of Yemen, included ‘Iranian-made anti-tank missiles, assault rifles, Dragunov sniper rifles, AK-47s, spare barrels, mortar tubes, and hundreds of rocket-propelled grenades, and RBG launchers’. [They] also stated that three disassembled spy drones found concealed in a truck at the Yemen-Oman border on 12 December 2016 by Yemeni armed forces and a spy drone belonging to the Houthis intercepted in-flight by

⁴⁵² “Report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 12 July 2016, <https://www.undocs.org/S/2016/589>.

⁴⁵³ Ibid.

⁴⁵⁴ Ibid.

⁴⁵⁵ “Second report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 20 December 2016, <https://www.undocs.org/S/2016/1136>.

⁴⁵⁶ Ibid.

⁴⁵⁷ Ibid.

⁴⁵⁸ “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 20 June 2017, <https://www.undocs.org/S/2017/515>.

Coalition forces in the Al-Mokha area on 28 January 2017 were a ‘clear manifestation of the involvement of Iranians in providing the Houthis with weapons and expertise’.”⁴⁵⁹

5-7 March: “Information released by the organizers of the sixth International Defence Exhibition in Iraq... indicates that several Iranian entities participated in the exhibition for the second year in a row”, in breach of Resolution 2231 and despite being told not to the year before.⁴⁶⁰

27 April: “Turkish authorities confiscated component parts of 9K111 Fagot and 9K113 Konkurs anti-tank guided missiles concealed in a truck that was transiting from Ukraine to the Islamic Republic of Iran” in an apparent breach of Resolution 2231. “According to Turkish authorities, the Iranian truck driver stated that he had obtained the items from another Iranian citizen in Kyiv, to be transported to Iran.”⁴⁶¹

18 May: UAE “brought to the attention of the UN Secretariat information regarding arms and related materiel seized or recovered by the armed forces of the United Arab Emirates in Yemen since 16 January 2016 that, in the assessment of the United Arab Emirates, were Iranian-made or sourced” in another apparent breach of Resolution 2231.⁴⁶²

7 June: US reported to the UN “a shipment of ballistic missile-related items that, in its assessment, was undertaken contrary to Resolution 2231. The letter stated that ‘in October 2016, an Iranian firm that supports the ballistic missile program received a consignment of controlled carbon fibre’. The letter concluded that ‘because this shipment did not receive advance, case-by-case approval as specified in Annex B of UN Security Council Resolution 2231 (2015), this export to Iran’s ballistic missile program was a violation of that resolution.’”⁴⁶³

5 December: Biannual report on the implementation of Resolution 2231 noted the nuclear deal was being implemented but that Iran violated the arms embargo provisions of Resolution 2231. The report noted the secretariat was continuing to investigate allegations that ballistic missiles launched at Saudi Arabia from Yemen were transferred by Iran to the Houthis in violation of Resolution 2231.⁴⁶⁴

- UK and US called for UN Security Council to respond. China and Russia said there was not enough evidence.⁴⁶⁵

19 December: Saudi Arabian officials reported a missile attack from Houthis using Iranian Qiam-1 missiles.⁴⁶⁶

● 2018 - 25 INCIDENTS

5 January: Saudi Arabian officials reported a Houthi missile attack from an Iranian Qiam-1 missile.⁴⁶⁷

⁴⁵⁹ “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 20 June 2017, <https://www.undocs.org/S/2017/515>.

⁴⁶⁰ Ibid.

⁴⁶¹ Ibid.

⁴⁶² Ibid.

⁴⁶³ Ibid.

⁴⁶⁴ “Letter dated 15 December 2017 from the Security Council Facilitator for the implementation of resolution 2231 (2015) addressed to the President of the Security Council”, United Nations Security Council, 15 December 2017, https://www.un.org/ga/search/view_doc.asp?symbol=S/2017/1058&Lang=E.

⁴⁶⁵ “Yemen: Council Vote to Renew Sanctions Regime”, Security Council Report, 26 February 2018, <https://www.securitycouncilreport.org/whatsinblue/2018/02/yemen-council-vote-to-renew-sanctions-regime.php>.

⁴⁶⁶ “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary-General”, United Nations Security Council, 12 June 2018, <https://www.undocs.org/S/2018/602>.

⁴⁶⁷ Ibid.

26 January: The UN panel of experts on Yemen found Iran to be in noncompliance with its obligations under the arms embargo.⁴⁶⁸

30 January: Saudi Arabian officials reported a Houthi missile attack using Iranian-made Qiam-1 missiles.⁴⁶⁹

12 February: Israeli officials reported “a UAV intercepted and downed that same day after entering Israeli airspace was an Iranian UAV” in breach of Resolution 2231.⁴⁷⁰

February–August: One Khorramshahr, two Shahab-3 variants, one Qiam and three Zolfaghar ballistic missiles were flight-tested in a potential breach of Resolution 2231.⁴⁷¹

March: The UN Secretariat was invited by the authorities of the UAE to examine UAVs reportedly recovered in Yemen after 16 January 2016. In their assessment, they were Iranian-made and had been transferred from Iran, breaching Resolution 2231.⁴⁷²

10–13 March: Iran participated in the International Defence Exhibition in Iraq, in breach of Resolution 2231.⁴⁷³

25 March: Saudi Arabia reported three more Houthi attacks using Iranian Qiam-1s, in the likelihood that they were sold by Iran, violating Resolution 2231.⁴⁷⁴

26 March: Saudi Arabian officials reported to the UN that they had confiscated an Iranian-made missile from Houthis, leading to the likelihood they were sold by Iran in violation of Resolution 2231.⁴⁷⁵

- “The [UN] Secretariat observed that the paint, serial numbering and other markings also appeared to be consistent with those of the [Iranian-made] Sayyad-2C. The Secretariat also observed that markings on the missile airframe and quality control labels on internal components were in Farsi.”

11 April: Saudi Arabia reported further missiles fired at them by Houthis were Iranian, leading to the likelihood they were sold by Iran in violation of Resolution 2231.⁴⁷⁶

19 April: The UAE reported that it had intercepted four shipments including “40 cylindrical segments of tungsten, one inductively coupled plasma mass spectrometer, 10 capacitors, and one titanium rod” that could be used in the development of nuclear technologies, and that “their transfer to the Islamic Republic of Iran would have required prior approval from the Security Council” under Resolution 2231.⁴⁷⁷

25–29 April: Information released by the organisers of the Eurasia Airshow 2018, held in

⁴⁶⁸ “Yemen: Council Vote to Renew Sanctions Regime”, Security Council Report.

⁴⁶⁹ “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary-General”, United Nations Security Council.

⁴⁷⁰ Ibid.

⁴⁷¹ “Sixth report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 6 December 2018, <https://undocs.org/S/2018/1089>.

⁴⁷² “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary-General”, United Nations Security Council.

⁴⁷³ Ibid.

⁴⁷⁴ “Sixth report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council.

⁴⁷⁵ Ibid.

⁴⁷⁶ Ibid.

⁴⁷⁷ “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary General”, United Nations Security Council.

Antalya, Turkey, indicated that several Iranian entities participated in that exhibition, in breach of Resolution 2231.⁴⁷⁸

27 April: The US “informed the UN Secretariat that, in their assessment, two commodities (carbon fibre and aluminium alloys) had been transferred to the Islamic Republic of Iran over the past year without prior approval from the Security Council” under Resolution 2231.⁴⁷⁹

9 May: Saudis reported two more missile attacks from Houthis using Iranian Qiam-1 missiles.⁴⁸⁰

10 May: “Israel stated that rockets launched from the Syrian Arab Republic towards Israel on 10 May 2018 had been launched ‘by the Quds Force of the Iranian Revolutionary Guard’ and constituted an ‘Iranian breach’ of Resolution 2231.”⁴⁸¹

15 May: “Ukraine indicated to the UN Secretariat that the Security Service of Ukraine had prevented an attempt by two Iranian nationals to procure and transfer to the Islamic Republic of Iran component parts of the ‘Kh-31’ (AS-17 ‘Krypton’) air-to-surface missile” in violation of Resolution 2231.⁴⁸²

21 May: The political leader of Hamas in the Gaza Strip, Yahya Sinwar, stated that the Islamic Republic of Iran had provided the Izz al-Din al-Qassam Brigades and other armed groups in Gaza with “money, [military] equipment and expertise” before and after the 2014 Israel-Gaza conflict. The transfers of arms and related material from Iran is contrary to the provisions of annex B to Resolution 2231.⁴⁸³

23 May: Israel reported that further “rockets launched from the Syrian Arab Republic towards Israel on 10 May 2018 had been launched ‘by the Quds Force of the Iranian Revolutionary Guard’ and constituted an ‘Iranian breach’ of Resolution 2231”.⁴⁸⁴

24 May: Bahrain reported to the UN Secretariat information regarding multiple seizures of arms that had been transferred in breach of Resolution 2231.⁴⁸⁵

12 June: The UN confirmed that missiles used in Houthi attacks on Saudi Arabia were of Iranian origin but could not confirm whether they were transferred before Resolution 2231 came into force.⁴⁸⁶

June: UAE “brought to the attention of the UN Secretariat information about unmanned aerial vehicles, reportedly recovered in Yemen, including some fitted with an explosive charge. In their assessment, those unmanned aerial vehicles were Iranian-made and had been transferred in a manner inconsistent with Resolution 2231.”⁴⁸⁷

24 June: Saudi Arabia reported that missiles fired at them by Houthis were Iranian, leading to the likelihood they were sold by Iran in violation of Resolution 2231.⁴⁸⁸

⁴⁷⁸ “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary General”, United Nations Security Council.

⁴⁷⁹ Ibid.

⁴⁸⁰ “Implementation of Security Council resolution 2231 (2015): Fifth report of the Secretary General”, United Nations Security Council.

⁴⁸¹ Ibid.

⁴⁸² Ibid.

⁴⁸³ Ibid.

⁴⁸⁴ Ibid.

⁴⁸⁵ Ibid.

⁴⁸⁶ Ibid.

⁴⁸⁷ “Sixth report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 6 December 2018, <https://undocs.org/S/2018/1089>.

⁴⁸⁸ Ibid.

August 2018: UAE again “brought to the attention of the UN Secretariat information about unmanned aerial vehicles, reportedly recovered in Yemen, including some fitted with an explosive charge. In their assessment, those unmanned aerial vehicles were Iranian-made and had been transferred in a manner inconsistent with Resolution 2231”.⁴⁸⁹

September 2018: UAE and Saudi Arabia presented the UN Secretariat with “container launch units for the Iranian-produced Dehlavieh anti-tank guided missile” that they had recovered in Yemen, leading to the likelihood they were sold by Iran in violation of Resolution 2231.⁴⁹⁰

October 2018: US officials invited the UN Secretariat to examine an arms shipment enroute to Yemen likely by Iranian smugglers in violation of Resolution 2231.⁴⁹¹

● 2019 - 10 INCIDENTS

April: The UAE invited the UN Secretariat to examine samples of an arms shipment which they believed was relevant to the implementation of Resolution 2231.⁴⁹²

4 April: Israeli officials stated that on 20 January 2019 “the Quds Force of Iran’s Islamic Revolutionary Guard Corps’ launched a surface-to-surface missile from the area of Damascus towards the Golan Heights, and that the missile had been transferred from the Islamic Republic of Iran to the Syrian Arab Republic after January 2016, in a manner inconsistent with Resolution 2231.”⁴⁹³

May: In a video release, the spokesman of the Al-Quds Brigades of the Palestinian Islamic Jihad group claimed that a “new missile (Bader 3)” was developed with support of the Islamic Republic of Iran “in all disciplines”, in breach of Resolution 2231.⁴⁹⁴

14 May: Saudi Arabian officials claimed that the Houthi attack on the Afif oil facility came via arms supplied by Iran in violation of Resolution 2231.⁴⁹⁵

June–August: Saudi Arabian officials claimed that the Houthis had claimed responsibility for attacks on Abha International Airport, saying “the attack proved the continued support provided by the Islamic Republic of Iran to the Houthis” in breach of Resolution 2231.⁴⁹⁶

July–August: US officials reported that “two shipments of hydroxyl-terminated polybutadiene were transferred to the Research and Self-Sufficiency Jihad Organization of the Islamic Revolutionary Guards Corps in July and August 2017 without prior approval of the Security Council” in breach of Resolution 2231.⁴⁹⁷

2 August: Houthis “announced the launch of the Borkan-3, a new liquid-propelled medium-range ballistic missile”. E3 claimed this was likely sourced from Iran, in violation of Resolution 2231.⁴⁹⁸

⁴⁸⁹ “Sixth report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)”, United Nations Security Council, 6 December 2018, <https://undocs.org/S/2018/1089>.

⁴⁹⁰ Ibid.

⁴⁹¹ Ibid.

⁴⁹² “Implementation of Security Council resolution 2231 (2015): Seventh report of the Secretary-General”, United Nations Security Council, 13 June 2019, <https://undocs.org/S/2019/492>.

⁴⁹³ Ibid.

⁴⁹⁴ Ibid.

⁴⁹⁵ “Implementation of Security Council resolution 2231 (2015): Ninth report of the Secretary-General”, United Nations Security Council, 11 June 2020, <https://www.undocs.org/S/2020/531>.

⁴⁹⁶ “Implementation of Security Council resolution 2231 (2015): Eighth report of the Secretary-General”, United Nations Security Council, 10 December 2019, <https://www.undocs.org/S/2019/934>.

⁴⁹⁷ Ibid.

⁴⁹⁸ Ibid.

14 September: Saudis claimed that “all preliminary signs and indicators reveal that this attack [on the Saudi Aramco facility] did not emanate from Yemeni lands”, as claimed by the Houthis, and that “the weapons used were Iranian-made”, in breach of Resolution 2231.⁴⁹⁹

19 November: Israeli officials stated that Iran had transferred the Sadad-103 electro-optic surveillance system to the Iraqi military, thus constituting a violation of arms transfer restrictions.⁵⁰⁰

25 November: US officials claimed that weapons that appeared to be of Iranian origin were being transferred in violation of Resolution 2231.⁵⁰¹ These included: components of a cruise missile; sections of two types of anti-ship cruise missiles; and 21 anti-tank guided missiles.

● 2020 - 5 INCIDENTS

9 February: US officials seized an arms shipment of Iranian origin.⁵⁰²

3 March: Saudi Arabia shared information regarding the “Houthi militia backed by Iran” and “an attempted terrorist attack that was planned to target an oil tanker.. south-east of the Yemeni port of Nishtun” with weapons supplied by Iran in apparent breach of Resolution 2231.⁵⁰³

28 March: Saudi Arabian officials reported that “Iran-backed Houthi militia launched two ballistic missiles towards civilians and civilian objects in Saudi Arabia”. The E3 states and Saudis claimed that the missiles were of Iranian origin.⁵⁰⁴

8 May: Israeli officials reported four Iranian Dehlabieh anti-tank guided missiles being employed in Libya, in breach of Resolution 2231, highlighting the geographical spread of Iran’s malign activities.⁵⁰⁵

19 May: Australian authorities intercepted an arms shipment from a dhow crewed with Iranian citizens that included “approximately 476,000 rounds of 7.62mm ammunition, and 697 bags of chemical fertiliser”.⁵⁰⁶

⁴⁹⁹ “Implementation of Security Council resolution 2231 (2015): Eighth report of the Secretary-General”, United Nations Security Council.

⁵⁰⁰ Ibid.

⁵⁰¹ Ibid.

⁵⁰² “Implementation of Security Council resolution 2231 (2015): Ninth report of the Secretary-General”, United Nations Security Council.

⁵⁰³ Ibid.

⁵⁰⁴ Ibid.

⁵⁰⁵ “Implementation of Security Council resolution 2231 (2015): Tenth report of the Secretary-General”, United Nations Security Council, 7 December 2020, <https://www.undocs.org/S/2020/1177>.

⁵⁰⁶ “Implementation of Security Council resolution 2231 (2015): Ninth report of the Secretary-General”, United Nations Security Council.

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