

EGYPT

ALERT

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On April 2, 2015, the five permanent members of the UN Security Council (China, France, Russia, the United Kingdom, and the United States) plus Germany, the European Union, and Iran came to agreement on a framework for achieving a deal regarding Iran's nuclear program. This framework forms the foundation for the Joint Comprehensive Plan of Action (JCPOA) that is expected to be finalized by the end of June.

Under the framework, Iran will receive limited and conditional sanctions relief if it abides by its nuclear-related commitments. Specifically, U.S. and EU nuclear-related sanctions will be suspended once the International Atomic Energy Agency (IAEA) has verified that Iran has complied with all of its initial nuclear-related obligations.

If at any time Iran fails to fulfill its ongoing commitments under the JCPOA, the U.S. and EU nuclear-related sanctions will be reinstated. Importantly, significant U.S. sanctions against Iran relating to terrorism, human rights abuses, and ballistic missiles are expected to remain in place. The full extent of U.S. and EU sanctions relief extended to Iran will remain unclear until the finalization of the JCPOA later this year.

Additionally, all nuclear-related UN Security Council resolutions against Iran will be lifted upon confirmation of Iran's compliance. However, a new UN Security Council resolution will be established that addresses, in part, nuclear-related transfers of sensitive technologies and activities, and restrictions on conventional arms and ballistic missiles.

The key parameters for the framework of the JCPOA are available here.



Recognize the Limitations of Permissible Iran Activities

U.S. businesses and individuals interested in pursuing opportunities in Iran should continue to exercise extreme caution and carefully review U.S. and EU sanctions and export controls rules and regulations to determine whether proposed Iran-related activities are permissible. It is important to remember that while the framework agreed to on April 2, 2015, does anticipate an easing of certain sanctions against Iran, significant sanctions and export controls will likely remain in place for the foreseeable future. Until the framework is fully adopted by all parties, existing sanctions against Iran remain in effect. It is expected that some domestic pressures not only in the United States, but also in Iran and other negotiating countries, may impact the nature of the final implementation of the JCPOA. For example, it is anticipated that Members of Congress are expected to propose legislation that would require the President to obtain Congressional approval for the deal before any sanctions are lifted.

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