POLICY BRIEF

E3 Prepared to Trigger Snapback by End of August

August 13, 2025 | *Tymahz Toumadje* **POLICY ANALYST**

As the end of August draws near, the foreign ministers of Germany, France, and the UK, also known as the E3, have moved from signaling to formal notice. In an August 8 letter to the United Nations, they set a de facto end-of-month deadline and laid out their legal case to trigger UNSCR 2231's snapback mechanism if diplomacy stalls.

The E3's Letter and Tehran's Reaction

- In their August 8 letter addressed to UN Secretary-General António Guterres and the UN Security Council, the E3 wrote: "We have made clear that if Iran is not willing to reach a diplomatic solution before the **end of August 2025**, or does not seize the opportunity of an extension, E3 are prepared to trigger the snapback mechanism."
    - The letter continued: "Despite unfounded claims to the contrary, the E3, as JCPOA participants, would be **clearly and unambiguously legally justified in using relevant provisions** of UNSCR 2231 (2015) to trigger UN snapback…"
        - **This clarification preempts Tehran's recurring claim**, revived since the 2020 U.S. snapback dispute (read more about this in NUFDI's *How Does the E3 Initiate Snapback Sanctions*), that the E3 lack authority under UNSCR 2231. This signals the E3's readiness to counter legal objections at the Security Council.
- The letter emphasized: "Direct negotiations between Iran and the US must resume urgently. The E3 stand ready to support this process. To this end, the E3 have offered Iran a limited extension of the relevant provisions of UNSCR 2231, in exchange for Iran resuming negotiations…**To date, the offer put forward by the E3 has remained unanswered by Iran.**"
    - Tehran's unresponsiveness to the E3's offer to postpone the resumption of snapback measures in exchange for good faith cooperation leaves the conditional extension unaccepted, supporting

the Europeans' claim of exhausted diplomacy and making snapback the only viable path to preserve UN restrictions before the October 18 sunset.

- The **Islamic Republic's public reaction to the potential triggering of snapback sanctions has remained indignant**, with Foreign Minister Abbas Araghchi warning that triggering UN sanctions "would signify the end of Europe's role in the Iranian nuclear dossier," with regime-aligned outlets relaying that Europe would "lose its role" if snapback proceeds. **In characteristic attempts to delay the clock and mislead Western powers, Tehran has paired its usual threats with conditional offers to resume talks if "stronger assurances" are provided**. Listed below are some of the lackluster arguments the Islamic Republic and its allies, such as China and Russia, have used to argue against the triggering of snapback sanctions.

    i. **Legal Challenge:** Araghchi says snapback has "no legal basis," arguing the E3 failed their JCPOA commitments and that Tehran invoked the deal's dispute mechanism after the U.S. withdrawal. Therefore, in Tehran's view, the E3 lack standing under UNSCR 2231.

    ii. **Future European Influence:** Araghchi warns the E3 would forfeit any mediating or supervisory role on the nuclear file, narrowing European influence in future talks.

    iii. **"Little" Economic Impact:** Araghchi claims snapback "economically changes little for Iran" given existing U.S. sanctions and their secondary sanctions, but concedes "politically, it matters," heightening isolation and escalation risks.

    iv. **Withdrawal From NPT:** In late 2024, a senior regime diplomat stated in an interview that "if the snapback mechanism is triggered, Iran will withdraw from the NPT," and that this message had been conveyed to European officials in writing. Such a move would end Tehran's legal obligation to remain a non-nuclear weapons state and **could terminate international inspections, one of the last remaining forms of leverage that the Islamic Republic believes it holds.**

Why Snapback Would Help Support the Iranian People

- Triggering the snapback mechanism would align international policy with the **Iranian people's long-term interests**.
    - Reaffirming that nuclear extortion won't be rewarded **undercuts the regime's core leverage** and **supports a future in which Iranians don't have to trade basic freedoms** for short-term economic relief that never reaches them.
    - In recent weeks, Iranians have rallied over water cuts and rolling blackouts. Footage and local reporting show crowds blaming the Islamic Republic's mismanagement for the crisis while security forces resorted to tear gas. **The people of Iran have shown that they place the blame for their hardship solely at the feet of the Islamic Republic, not the powers attempting to hold that regime accountable.**

- This would **constrain the Islamic Republic's ability to crack down on the Iranian people**, as it's doing right now.
    - With greater diplomatic, legal, and financial scrutiny, the regime's forces face fewer resources, fewer suppliers, and higher risk for abuse, precisely when the regime is detaining citizens en masse. **Tehran itself claims to have arrested 21,000 "suspects" and executed at least seven "spies" since the 12-Day War in June**.
- UN snapback re-establishes a clear, rules-based basis for isolating Tehran's nuclear misconduct, shrinking the regime's diplomatic room to maneuver and **raising the perceived cost of repression and adventurism at home and abroad**.
    - This sort of international action mobilizes states that won't act on human rights grounds alone, but will on nuclear violations. **Many nations need a contractual breach, not a rights report, to justify action.**

"Snapback" Defined

- The "snapback mechanism" refers to the expedited process of reimposing previously lifted UN sanctions on the Islamic Republic in Iran in accordance with UNSCR 2231, the UN Security Council resolution which endorsed the 2015 Joint Comprehensive Plan of Action (JCPOA).
    - The sanctions reimposed under a successful usage of the snapback mechanism would encompass all restrictions set out in UNSCRs 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010). This includes:
        i. An indefinite **ban on the transfer of conventional arms** to and from the regime in Iran
        ii. An indefinite **ban on international support for the regime's missile program**
        iii. A **ban on all testing and development of nuclear-capable missiles** by the regime in Iran
        iv. A demand for the regime in Iran to **halt all enrichment**-related activities
        v. An indefinite **travel and asset ban** for sanctioned individuals

How is the Snapback Mechanism Activated?

- The process of invoking the snapback mechanism begins when any current JCPOA participant (France, the UK, Germany, China, and Russia) puts forth a complaint of a "significant non-performance of commitments under the JCPOA." Following this submission of a complaint by a JCPOA participant, the president of the UN Security Council must submit a resolution for a vote to ignore the complaint within ten days if no other Security Council member has done so. If a resolution to ignore the complaint is not adopted by the Security Council within 30 days following the initial submission of the complaint, then all UN sanctions detailed above "snapback" into place.

- The primary advantage to this process, when compared to the adoption of a separate, new UNSCR, is that **the reimposition of sanctions cannot be vetoed by any permanent member of the Security Council**. Due to the design of the JCPOA, any veto, particularly from China or Russia, of a resolution submitted to ignore a complaint, would only result in sanctions being reimplemented when the 30-day window is over.

- The snapback mechanism **will no longer be available under UNSCR 2231 following October 18, 2025**.