Client**Alert**

International Trade

EU adds 180 designated parties to Iran sanctions list as the first part of strengthening of its Iran sanctions regime

On 1 December 2011, the Council of the European Union (EU) – in **Council Decision 2011/783/CFSP**¹ – added entries to its list of designated parties under the Iran sanctions regime. This Decision was published in the EU's Official Journal of 2 December 2011, with accompanying **Council Implementing Regulation 1245/2011** (which amends the EU's original Iran Sanctions Regulation, Regulation 961/2010, and has entered into force on that date).²

For a description of the features of the EU's original Iran Sanctions Regulation (i.e. Regulation 961/2010),³ which previously has been amended by Regulation 503/2011,⁴ see our alert from <u>29 October 2010</u>.

Regulation 1245/2011 adds 180 Iranian and non-Iranian persons and entities considered involved in nuclear or ballistic missiles activities, or affiliated with the Islamic Revolutionary Guard Corps (IRGC) or Islamic Republic of Iran Shipping Lines (IRISL), to the EU's list of parties subject to an asset freeze featured in Annex VIII to Regulation 961/2010. As a result, parties subject to EU jurisdiction must not make funds or economic resources directly or indirectly available to or for their benefit. In addition, the new Regulation amends certain entries of designated parties involved in nuclear or ballistic missiles activities or affiliated with IRISL already featured in Annex VIII.

In its conclusions adopted on 1 December 2011, the Council reiterated its "serious and deepening concerns over the nature of Iran's nuclear programme"⁵ while agreeing to the above described new sanctions measures. In addition, the Council promised to further broaden the EU's Iran sanctions regime by developing and adopting new measures aimed at severely affecting the Iranian financial system, transport and energy sectors, the IRGC and other areas. Accordingly, additional new EU sanctions measures against Iran could be expected in the near future.

2 December 2011



For more information, please contact:

James Killick Partner, Brussels + 32 2 239 2552 jkillick@whitecase.com

Sara Nordin Associate, Brussels & Hong Kong + 852 2822 8789 snordin@whitecase.com

Fabienne Vermeeren Regional Director Europe – International Trade Services, Brussels + 32 2 239 2606 fvermeeren@whitecase.com

This Client Alert is provided for your convenience and does not constitute legal advice. It is prepared for the general information of our clients and other interested persons. This Client Alert should not be acted upon in any specific situation without appropriate legal advice and it may include links to websites other than the White & Case website. White & Case has no responsibility for any websites other than its own and does not endorse the information, content, presentation or accuracy, or make any warranty, express or impled, regarding any other website.

This Client Alert is protected by copyright. Material appearing herein may be reproduced or translated with appropriate credit.

In this publication, White & Case means the international legal practice comprising White & Case LLP, a New York State registered imited liability partnership, White & Case LLP, a limited liability partnership incorporated under English law and all other affiliated partnerships, corporations and undertakings. © 2011 White & Case LLP

¹ <u>Council Decision 2011/783/CFSP</u> of 1 December 2011 amending <u>Decision 2010/413/CFSP</u> concerning restrictive measures against Iran, [2011] OJ L 319/71.

² Council Implementing Regulation (EU) No 1245/2011 of 1 December 2011 implementing Regulation (EU) No 961/2010 on restrictive measures against Iran, OJ L 319/11.

³ Council Regulation (EU) No 961/2010 of 25 October 2010 on restrictive measures against Iran and repealing Regulation (EC) No 423/2007, OJ L 281/1.

⁴ <u>Council Implementing Regulation (EU) No 503/2011</u> of 23 May 2011 implementing Regulation (EU) No 961/2010 on restrictive measures against Iran, OJ L 136/26. This amending Regulation added five persons and 72 entities (plus certain specified subsidiaries to those entities) to, and amended certain existing entries in, the EU's list of designated parties in Annex VIII to Regulation 961/2010. A consolidated version of Regulation 961/2010 reflecting those amendments is available here: <u>http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2010R0961:20110524:EN:PDF</u>.