The Effectiveness of the Fourth Round of Sanctions against Iran

by Reagan Thompson

In June 2010, the United Nations Security Council adopted its fourth round of sanctions against Iran. There have been further US and EU unilateral sanctions against Iran and a large private sector voluntary pullout from the country. But are these three approaches successful in slowing and ultimately ending Iran’s nuclear program? A closer look reveals that these efforts are helping to strangle the Iranian economy, but have not led to an end of the Iranian regime’s pursuit of a nuclear weapon. Until Russia, Germany, and China limit their trade with Iran, or until the world is ready to enact sanctions against the country’s oil sector, Iran will continue to work toward a nuclear weapon.
This summer, the United Nations Security Council adopted Resolution 1929 (UNSCR 1929) as the first part of the international community’s three-pronged response to Iran. Following this resolution, the United States and other nations enacted the second prong: unilateral sanctions against Iran. The third prong is the withdrawal of private industry from Iran. As it is essential that the international community prevent Iran from developing nuclear weapons, it is important that the sanctioning nations are able to gauge the effectiveness of their responses. While this recent round of sanctions has imposed a significant burden on the Iranian regime, it has not led to any significant changes in its behavior. Because other methods of pressuring Iran, such as oil sanctions, a military strike, containment, and engagement, are currently unfeasible, the international community is forced into an uneasy stalemate while Iran continues to develop its nuclear program. This paper will broadly review sanctions against Iran and show that the three-pronged approach of the United Nations (UN) sanctions, unilateral sanctions, and private pullout has slowed Iran’s nuclear program. However, tougher measures such as sanctions against Iran’s oil sector are still necessary to force the regime into irreversibly dismantling its nuclear weapons program.

I will begin with a background of the previous rounds of sanctions against Iran before turning to a discussion on the international community’s three-pronged approach to Iran’s nuclear program. I will also analyze the international and Iranian responses to these sanctions. Next, I will examine the effects of these sanctions, in light of their effect on the economy, pressure on the regime, and ability to achieve their objectives. I will conclude by explaining that while sanctions have ultimately failed in achieving their goals, they are the only realistic option currently available to the international community.

Iran has a dubious history of adhering to its international obligations and cooperating with the International Atomic Energy Agency (IAEA). As a signatory to the Nuclear Non-Proliferation Treaty (NPT), Iran is allowed to engage in the peaceful production and use of nuclear energy. However, its secret development of nuclear sites within its borders has caused the world to doubt the peaceful intentions of the country’s nuclear program. Tensions between Iran and the IAEA reached a head in 2006 when Iran failed to comply with IAEA requests and inspections. When Iran announced that it had successfully enriched uranium, the Security Council was forced to respond.

On July 31, 2006, the UN Security Council passed UNSCR 1696, demanding that Iran suspend all enrichment and reprocessing, as well as research and development, for its nuclear program. When Iran failed to comply, the UN unanimously approved UNSCR 1737 on December 23, 2006, calling on states to impose a freeze on the financial assets of persons and entities involved in Iran’s nuclear activities and to block Iran’s import and export of nuclear material. Following further Iranian recalcitrance, the Security Council unanimously voted in favor of UNSCR 1747 on March 24, 2007. Resolution 1747 imposed an embargo on all Iranian arms exports and extended the asset freeze and travel ban to members of the Islamic Revolutionary Guard Corps (IRGC). On March 3, 2008, the Security Council unanimously approved another resolution, UNSCR 1803, which extended financial and trade restrictions against Iran.

After further resistance from Iran, the Security Council moved forward with sanctions once more and adopted UNSCR 1929 on June 9, 2010. The United States helped organize votes for this resolution, and the Obama administration made significant concessions to ensure international solidarity. For example, in order to obtain Russian support for enhanced sanctions, President Obama agreed to move a planned US missile defense shield from Poland and the Czech Republic to the Mediterranean. Brazil and Turkey voted against the resolution because of a deal they made with Iran in May 2010. The agreement stipulated that Iran would ship 1,200 kilograms of low enriched uranium to Turkey and then receive nuclear fuel for supposed use in its medical research reactor. Turkey and Brazil claimed the deal would be more effective than sanctions
in getting Iran to cease its enrichment activities.3 Because Lebanon was the only Arab state on the Security Council, it handled its delicate situation by abstaining from voting to save face among its Western allies while appeasing Hezbollah.4

UNSCR 1929 is the strictest round of sanctions against Iran yet.5 It expanded upon previous rounds of UN sanctions and added further restrictions on Iranian trade. First, 1929 subjects additional individuals and entities, including IRGC affiliates, to an asset freeze and travel ban. Second, the Resolution bans the provision of financial services and insurance to Iran. Third, if shipments are suspected of carrying prohibited material, 1929 gives countries authority to inspect the shipments, and dispose of cargo. Fourth, the resolution bars Iran from investing in uranium mining and other nuclear activities in other countries. Finally, the resolution requires countries to insist that companies in their country, including banks, refrain from doing business with Iran if there is reason to believe that such business could further Iran’s nuclear program. To monitor compliance with this Resolution, the Security Council established a panel of eight experts to collect and review reports with information on how countries have implemented the resolution.

Despite these provisions, there are several loopholes in the resolution. For example, although the resolution bans the sale of most categories of heavy arms to Iran, it only requests restraint in the sales of light arms and does not bar sales of missiles (that are not on the UN Registry of Conventional Arms). Furthermore, although countries have the legal right to inspect shipments to and from Iran, the inspecting country must first receive concurrence from the country that owns that ship.

Unilateral sanctions are the second prong of measures against Iran. The US is by far the most active participant, though the European Union (EU) and other nations have followed suit. The US has been sanctioning Iran since the 1979 Islamic Revolution. US efforts to curb international investment in Iran’s energy sector began in 1996 with the Iran Sanctions Act (ISA). The ISA mandates US penalties on foreign companies that maintain business dealings with Iran’s energy sector. After the passage of 1929, President Obama approved the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA), which expanded ISA. The CISADA attempts to restrict Iran’s ability to make or import gasoline. Executive Orders 12959, 13324, 13553, and 13382 similarly attempt to encircle Iran by enacting US sanctions on Iranian officials and freezing assets of those supporting terrorism and proliferation. To enforce these sanctions, the US can impose multi-million dollar fines on businesses found to be in violation of the law.

US sanctions, while strict, have not been able to totally shut off US trade with Iran. The Treasury Department has allowed around 10,000 exceptions to US sanctions to companies like Kraft and Pepsi for humanitarian or other reasons. A State Department official defended these exceptions by noting that “the legal export of popcorn, chewing gum, cake sprinkles and hot sauce is not propping up the Iranian government.”6 Others acclaim, however, that favoritism has allowed Iran economic freedom.

The US has led the way in encouraging other countries to enact nation-specific regulations to further isolate Iran. The EU, Australia, Canada, India, Japan, Norway, and South Korea all have imposed restrictions against Iran with varying levels of intensity. The EU has somewhat aligned itself with the US by prohibiting EU involvement in Iran’s energy and finance sectors. Within the EU, however, there are varying levels of cooperation, as I will outline later. Russia and China have not enacted their own unilateral sanctions against Iran. As noted above, both these countries support the first pronged attack against Iran, UN sanctions, but are much less enthusiastic about the second and third prongs. Consequently, Russian and Chinese trade with Iran is a significant reason why the regime is still financially afloat.

The third prong is private sector voluntary pullout from Iran. This response is motivated by the UN sanctions, but is not required by law. Financial institutions, energy companies, and businesses make choices based on cost/benefit analysis and their strategy thus far seems to be to prevent Iran, a country reliant on global trade, from being able to do business outside its borders. The US Treasury Department began by blacklisting the largest Iranian financial institutions and banks in other nations such as Britain, France, Germany, Japan, China, Malaysia, Bahrain, and Italy followed suit. The withdrawal of more than 80 large financial institutions such as UBS, HSBC, and AG has begun to wreak havoc on Iran’s fragile financial situation. Former Secretary of State Condoleezza Rice noted that while these actions were not sanctions in the traditional sense, they were having similar effects and working towards the same goals.7
The effect of private pullout is evident in the major industries, including the energy sector. Major gasoline suppliers such as BP, Glencore, Lukoil, Reliance Industries, Royal Dutch Shell, Total, Trafigura, and Vitol have stopped dealing with Iran. Among many others, Halliburton, GE, Huntsman Chemicals, Kia, Siemens AG, Mercedes Benz, Toyota, and Thyssen-Krupp have officially ceased doing business in Iran.8 However, because there are few enforcement mechanisms, it is difficult to determine the effectiveness of this third. There have been several accusations that these companies are making statements against Iran, while still engaging in clandestine trade with the country.

The ultimate purpose of the three-pronged approach of UN sanctions, unilateral sanctions, and private pullout is to ensure that Iran does not develop a nuclear weapon. The hope is that by making it more expensive and difficult for Iran to obtain industrial equipment and nuclear supplies, the country’s nuclear program will be substantially slowed and the regime will be forced to abandon its nuclear weapon ambitions. Thus, the sanctions hope to change the regime's cost-benefit calculus of its nuclear program. The international community would also like to see the Iranian public voice their dissatisfaction with the Iranian regime and state of the economy, which would push the regime towards compromise.

Further, the international community wants to ensure the integrity of the international treaty system and is thus punishing Iran for its decision to ignore its NPT obligations.

Now with an understanding of the three-pronged approach to Iran, we can examine how Iran has responded. Statements by Iranian leaders generally fall into two categories: those that recognize the impact of the sanctions, and those that refuse to acknowledge their influence. After passage of UNSCR 1929, Supreme Leader Ayatollah Khamenei stated that sanctions have “no effect on the people's livelihood.”9 President Mahmoud Ahmadinejad said the sanctions “are annoying flies, like a used tissue.”10 While there is some truth in his statement that sanctions have been tried in the past and have failed, his overly colorful language points to his refusal to acknowledge the real pain sanctions are inflicting on Iran. Ahmadinejad further stated that sanctions actually make Iran stronger by encouraging self-sufficiency and technical progress. The Iranian regime is attempting to portray the international community as a weak force that desires to unfairly discriminate against Iran and hurt its people.

In contrast to Ahmadinejad, other Iranian leaders understand the gravity of the sanctions. Former President Akbar Hashemi Rafsanjani warned the regime “to take the sanctions seriously and not as a joke,” recognizing the strictness of the world’s response to Iran.11 Former Prime Minister and leader of the Green Movement, Mir-Hossein Mousavi similarly agree with Rafsanjani on the severity of these sanctions. One of his senior advisors said that the sanctions would have a “clear effect on the day to day lives of the people.”12

With a grasp of the response to Iran, I now turn to examine the sanctions’ effectiveness based on their impact on the economy, pressure on the regime, and completion of stated objectives. When evaluating whether or not sanctions have accomplished their goals, it is important to remember that it takes years for sanctions to affect a nation. The cumulative effect of years of sanctions is only starting to have a strong negative impact on the Iranian economy. It is difficult to determine direct causality, but it is safe to assume that sanctions have exacerbated the problems from economic and political mismanagement of the regime. Analysis is also made difficult by the fact that the regime has not released up-to-date numbers on economic data such as gross domestic product (GDP) or household expenditures. By looking at economic data such as consumer prices, export prices, oil exports and imports, the subsidy program, and GDP, it is clear that the sanctions are having a strangling effect on Iran’s economy.

Iran’s economy is a mess. The regime claims that unemployment is 13.2 percent13 but opposition
leaders insist that it is more likely around 20 percent. Similarly, the Central Bank says that inflation is at 14 percent, but some economic data indicates the rate could be twice as high. The Iranian consumer price index (CPI), which measures the changes in the price level of consumer goods and services, has skyrocketed in the past years. This means that consumer prices are soaring and businesses are finding it increasingly difficult to make ends meet. According to the Iranian Central Bank, the general CPI for urban Iranians has jumped 12.9 percent from 2009-2010. In comparison, the US CPI increased 1.4 percent for this same time period. The cost of food and beverages in Iran rose almost 20 percent from 2009-2010. As Figure 1 shows, since about March 2002 until March 2011, Iran's CPI has been on a rapid rise. As the cost of living in Iran increases, there is also greater chance for domestic unrest.

For the international strategy to be successful, it is essential that the Iranian people see the regime, not sanctioning nations as the reason for these economic problems. The world hopes that as Iranian citizens find it increasingly difficult to afford food, clothing, water, and other basic necessities, they will turn against the regime. If a backlash occurs, and Iranians begin to blame other nations for their economic malaise, the purpose behind much of the sanctions will no longer be valid. Currently, it seems that the Iranian public rightly blames their government for the economic management. The sanctions are working to economically isolate Iran and squeeze it from the global market.

High levels of economic distress stoke existing levels of social unrest. With about 60 percent of the Iranian population under 30, high unemployment means that many young adults are willing to participate in opposition movements and advocate change. Although the regime attempts to suppress any uprisings, there is evidence of increasing domestic and political unrest. In July 2010, one month after the passage of UNSCR 1929, there was a two-week strike in Tehran by bazaar merchants. Ostensibly it was a protest against an increase in taxation, but it is likely that the adverse business environment due to sanctions contributed to the event. The economic disturbance caused by the sanctions is also causing internal political disturbance. There have been several arrests of supposed “nuclear spies” and President Ahmadinejad fired Foreign Minister Mannouchehr Mottaki for failing to prevent the imposition of sanctions, though this move was also politically motivated. In response to the economy's poor performance, the Iranian Finance Minister also fired six cabinet ministers and two Central Bank governors.

Iran is increasingly dependent on oil exports for its economic livelihood, but sanctions are working to curtail Tehran's revenues. As a result of mismanagement and the inability to procure Western technology, Iran's oil production has fallen from about 4.1 million barrels a day in the mid-2000s to only 3.8 million barrels a day in 2010. The graph on the right shows this precipitous drop. Figure 2 shows that while Iran's oil production has been cyclical since sanctions
were first imposed in 2006, there has been a general decrease in the total production. Figure 3 shows that Iran’s oil-pumping capacity is expected to decline about 18 percent from current levels of 3.8 million barrels a day to 3.3 million barrels a day in 2015. This decrease in production translates into fewer exports as countries attempt to diversify their oil supply and turn away from Iran and less revenue for the regime.

These economic pressures are forcing changes in the way the Iranian government is run. In order to get basic goods, the government must pay bribes, middlemen, and black market fees. At the end of 2010, the regime began to phase out its substantial subsidy program. It is likely that the government was forced to end these subsidies due to declining oil revenues and the increasing cost of doing business in the international market. The government began with a reduction in subsidies on gas and bread. Immediately, the price of bread spiked from 15 cents to 40 cents. The biggest cuts and jumps in prices are likely yet to come. This huge increase has the potential to turn the Iranian people against the regime, though there has been little public unrest as of yet. International sanctions are forcing the regime to make tough economic decisions that further erode its domestic standing. Although the government has offered payments to the lower classes, it is only small amount that few Iranians have actually received.

Although Iran is home to the world’s third largest oil reserves, it does not have the refinement capacity to produce its own fuel and thus it imports a sizeable amount of gasoline. As many major oil companies have refused to do business with Iran, it has faced difficulty in procuring enough fuel to run the country. It is estimated that since the imposition of the US Comprehensive Iran Sanctions Act in 2010, gas deliveries to Iran have fallen 75 percent, from about 3.5 million barrels a day to about 900,000 a day. Further, investment in Iran’s energy sector has decreased dramatically. All foreign firms have pulled out of the South Pars Gas Field Project, which had the potential to greatly grow Iran’s natural gas production.

Increases in consumer prices and decline in oil production and exports all point to a declining gross domestic product (GDP). Although the numbers are difficult to determine, it is clear that each successive round of sanctions lowers Iran’s GDP. Figure 4 shows Iran’s GDP growth from 1980 to the present. Each dotted vertical line indicates new international or US sanctions against Iran. Although GDP growth has been fairly stable over the past decade, predictions for the present and future do not look promising.

In addition to the economic problems above, the Iranian regime faces further commerce issues. Tehran is unable to attract desperately needed foreign investment. It is estimated that sanctions have deterred about $50 billion in investment in Iran’s energy sector. Soon after the passage of 1929, Lloyd’s of Britain announced that it would cease to insure Iranian ships and gasoline. This makes international trade substantially more difficult as firms are increasingly wary of the risks associated with doing business with Iran. The US Treasury Department’s sanction of Islamic Republic of Iran Shipping Lines (IRISL), the regime’s shipping company of choice, is harming Iran’s ability to ship goods. * There is unrest among merchants whose trouble obtaining financing, insurance, and shipping is driving up their costs by an estimated 40 percent. As the cost of doing business in Iran increases substantially, it becomes increasingly difficult to provide employment and goods for a country of almost 73 million.

Undersecretary of Treasury Stuart Levey noted, “Iran is effectively unable to access financial services from reputable banks and is increasingly unable to conduct major transactions in dollars or Euros.” In addition to the withdrawal of large banks noted above, there seems to be a regional movement against Iran as well. For example, out of the 48 banks in Dubai, all but a few have cut off new business with Iranian banks cited in UN resolutions. These decisions have wide reaching effects on the Iranian economy. When the United Arab Emirates, a major Iranian financial hub, began restricting transactions with Iranian banks in September 2010, the value of the rial, Iran’s currency, fell by about 15 percent.
To review, increases in consumer prices point to the cultivation of a difficult business environment in Iran, which is stoking domestic unrest. Decreases in oil production and exports as well as declining GDP have meant a drop in government revenue, prompting the end of the subsidy program. Fewer oil imports and other commercial strains are further indicators of the tangible impacts sanctions are having on the Iranian economy and regime.

Despite this progress, there is evidence that subversion and illegal activity are allowing Iran to continue to function economically and to expand its nuclear program. For example, a wide range of US military and dual-use goods are illegally transshipped to Iran through the UAE, Malaysia, and Singapore. There have been several international cases of this subversion. In a case in 2009, a well-connected Indian businessman secretly provided cladding, thermal insulation, and ancillary equipment to Iran in a variety of shipments. Frighteningly, all of those materials can be used in the construction of a nuclear reactor. Further evidence indicates that many Iranians in Azerbaijan are involved in Iranian regime-related profit making, sanctions busting, and money laundering.

The practice of establishing front companies and reshipping materials to Iran also allows the regime to circumvent sanctions. In 2008, it is estimated that 80 percent of the trade between the UAE and Iran was made up of goods that were re-exported from the UAE. By shipping goods to the UAE and then shipping them to Iran, the regime is able to evade sanctions. Thousands of front-companies in Dubai exist solely to get contraband materials into Iran. To some, Dubai is known as “Iran’s backdoor to the West” and provides Iran with everything from household goods to military equipment. While the UAE officially supports the sanctions, its porous borders tell another story.

The UAE is not the only culprit however. Several other nations have been increasing their trade with Iran even while the UN and many other countries seek to economically isolate Iran as a way to encourage non-proliferation. According to Karim Sadjadpour, an associate at the Carnegie Endowment, as trade between Iran and the EU has declined for the past years Iranian trade with China has increased substantially. China is very dependent on Iranian oil and it is predicted that trade between Iran and China will hit $50 billion by 2015.

Figure 5 shows how trade between Iran and other nations has changed since 2003. China, India, South Korea and the UAE show huge increases. In order for sanctions to be truly effective, every nation needs to be cutting back on its trade with Iran, not increasing it. There have been further changes since Figure 5’s publication in 2009. Although it shows that German trade with Iran decreased from 2003-2009, there is evidence to suggest that there has actually been an increase in trade since 2009. The German newspaper Handelsblatt reported that exports from Germany to Iran increased 11.6 percent to 2.5 billion Euros in less than a year from January-August 2010. The German-Iranian Chamber of Industry and Commerce in Tehran lists 200 German firms in Iran that are “making a major contribution to sustaining the present Iranian regime.”

While evidence clearly suggests that sanctions are negatively affecting the Iranian economy and are pressuring the regime to change, there are substantial and successful efforts to evade sanctions. In order to judge the true effectiveness of the sanctions, one must look at the original intentions of the sanctions. From the beginning of this paper, I noted that the primary international objective was to prevent Iran from developing nuclear weapons. Sanctions are a way to slow its development and ultimately lead to its end. Has the three-pronged approach of UN sanctions, unilateral sanctions, and private pullout slowed Iran’s nuclear program? Based on preliminary analysis, yes,
the sanctions have slowed the program, but not to a satisfactory level. On one hand, sanctions have made it increasingly difficult for Iran to acquire critical inputs for uranium enrichment, such as carbon fiber and a type of high-strength steel. On the other, each day that passes is another opportunity for Iran to develop its nuclear weapons program and figure out ways to circumvent sanctions. Figure 6 shows that in February 2008, Iran produced about 43 kilograms of low-enriched uranium and that the amount jumped to almost 120 kilograms in April 2010. Despite all the sanctions, Iran has continued to enrich uranium and its nuclear stockpile is increasing rapidly. With regards to converting its nuclear materials into weapons, Iranian missile capacity has been increasing as well. Further more, since 1985, Iranian missile range has also been steadily improving, despite frequent sanctions.

As of yet, sanctions have failed to curtail the regime’s nuclear program. Tehran seems as obstinate as ever in its pursuit of a nuclear weapon. Public outcry has also failed to develop to a point where it can force the regime to change directions on this issue. Fortunately, sanctions do not seem to be unfairly targeting the civilian population and Iranian citizens still blame the regime for their economic situation.

Sanctions have helped show the Iranian regime the pain of isolation. As private companies and countries refuse to do business with Iran, it is becoming clearer that Tehran’s list of friends is quickly shortening. It is evident also that by punishing Iran the international community has helped ensure the integrity of the international treaty system, even while nations such as China and Germany continually undermine that offer. Nevertheless, the offer of engagement still stands and there is hope that Iran may one day reintegrate into the international community if it fulfills its international obligations.

Despite these positive results, however, significant loopholes remain. Subversion tactics are hard to suppress and Iranian oil continues to flow amidst private withdrawal and a suffering economy. Ultimately, there is inadequate international commitment to truly isolate Iran. While there are estimates that Iran will not have a nuclear weapon until 2015, it is entirely undesirable for Iran to ever have such a weapon.

Two things are needed for international sanctions to effectively stop Iran’s nuclear program. First, there must be real international unity and solidarity of mission in isolating Iran. Russia, Germany, and China need to move to limit their trade with Iran. Each nation needs to enact its own strict sanctions against Iran. Countries such as the UAE should not tolerate the subversion of sanctions. Second, the Iranian people must demand change. Recent uprisings in the Middle East provide a glimmer of hope that domestic unrest can be a powerful tool against dictators.

Sanctions against Iran’s oil industry might be the next step the international community is forced to take against Iran. Iran currently exports about 2.5 million barrels of oil a day, and the loss of this supply would send global prices skyrocketing. In reality, however, the world lacks preference and money for this type of action. Additionally, because oil revenues make up about 80 percent of the government’s budget, a true embargo on Iranian oil would certainly harm the civilian population. The sanctioning nations would have to be sure to prevent any domestic blowback against the sanctions because sanctions are never intended to target innocent civilians. Although sanctions against Iran’s energy sector are currently unfeasible, it is plausible to enforce sanctions that hinder the regime’s ability to act. For example, the U.N could sanction monitoring technology that the regime uses to spy on its people. Firms should be barred from making trades like Nokia did in 2008, which provided the regime with the technology needed to monitor and control telephone calls.

The international community’s three-pronged approach to Iran’s nuclear program consisting of UNSCR 1929, unilateral sanctions, and the private pullout have slowed Iran’s nuclear program. Increases in consumer prices, decreases in oil production and exports, the end of the subsidy program, decreasing oil imports, declining GDP and other commercial strains show that the sanctions are strangling Iran’s economy. However, while sanctions have kept Tehran weak, they have not forced a fundamental change in the country’s policies. Sanctions are the only realistic option currently available to the international community but currently unsuccessful due to significant loopholes. Sanctions against Iran’s oil sector have the potential to bring the regime to its knees but are currently infeasible. Iran’s nuclear program has proceeded due to a lack of international unity. Countries such as Russia, Germany, and China need to take their own independent steps to ensure Iran does not develop the bomb.
Endnotes

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2. Philip “Russia Says It Will Join Sanctions”
3. Kollock “Lebanon Cautions on Iran Sanctions”
4. Warner “Examining the Effects”
5. Johnson, “Treasury Defends 10,000 Exceptions”
6. Wright “Stuart Levey’s War”
7. Katzman “Iran Sanctions” pg. 32
8. Erdbrink, “Iran’s Khamenei Says”
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21. Wright “Stuart Levey’s War”
22. Blas “Sanctions Put Choker on Iran Oil Exports”
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25. Katzman “Iran Sanctions” pg. 14
26. BBC “Squeezing Iran” (For an interactive version of the graphic, go to http://www.bbc.co.uk/news/world-middle-east-10727616)
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34. Institute for Science and International Security, “State Department Cables”
35. Pan Armenian Net, “Iranians in Baku Involved in Money Laundering Activities”
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40. Tehran Times, “Iran-Germany Trade”
41. Kuntzel “Who Is Who in German Trade”
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44. Katzman “Iran Sanctions” pg. 2
45. Cellan-Jones “Hi-Tech Helps Iran”

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