

UN and EU Reimpose Sanctions on Iran Following Snapback Mechanism

SEPTEMBER 29, 2025

On September 27, 2025, the United Nations reimposed sanctions and other restrictions based on Iran's continuing "significant non-performance" of its nuclear commitments. Today, September 29, following the [UN resolution](#), the [European Union](#) formally reimposed a broad range of sanctions on Iran, citing the same "significant non-performance" of its nuclear commitments under the Joint Comprehensive Plan of Action (JCPOA). These actions follow the invocation of the JCPOA's snapback mechanism by the E3 (France, Germany, and the United Kingdom) on August 28, 2025, and mark a major shift in the international legal and commercial landscape for entities engaged with Iran.

UN SANCTIONS SNAPBACK

The UN Security Council has reinstated sanctions pursuant to Resolutions 1696, 1737, 1747, 1803, 1835, and 1929, which had been lifted under Resolution 2231 (2015). These measures include:

- Request to suspend Iran's uranium enrichment, heavy water, and reprocessing activities
- Prohibition on Iran's use of ballistic missile technology
- Embargo on conventional arms exports to Iran
- Reimposition of travel bans and global asset freezes on designated individuals and entities
- Authorization to seize weapons and prohibited cargo transferred by Iran

According to the U.S. Department of State press release, the UN sends a clear message with the snap-back decision: "the world will not acquiesce to threats and half measures – and Tehran will be held to account."

EU SANCTIONS REINSTATED

On September 29, 2025, the Council of the European Union reimposed all nuclear-related restrictive measures that had been lifted following the JCPOA's implementation in 2016. These include:

- *Trade restrictions*: bans on the import, purchase, and transport of Iranian crude oil, natural gas, petrochemicals, petroleum products, and related services; export bans on key energy sector equipment, gold, precious metals, diamonds, naval equipment, and certain software

- *Financial measures*: asset freezes on the Central Bank of Iran and major Iranian commercial banks; prohibition on making funds or economic resources available to listed entities
- *Transport restrictions*: denial of access to EU airports for Iranian cargo flights; bans on maintenance and servicing of Iranian aircraft and vessels carrying prohibited goods

These measures were triggered by the E3's formal notification to the UN Security Council and a joint recommendation to the EU Council.

Implications for Businesses and Recommended actions

Companies with exposure to Iran—direct or indirect—should take immediate steps to reassess their compliance posture. While U.S. based entities were already prohibited from virtually all dealings with Iran, multinational or non-U.S. companies may want to reassess their dealings involving Iran.

We recommend that clients take proactive steps to mitigate potential exposure by conducting a comprehensive sanctions risk assessment, updating internal compliance protocols and training programs, and closely monitoring developments from the United Nations, European Union, and relevant national authorities. Additionally, clients should seek legal counsel before engaging in any new transactions involving Iranian parties to ensure full compliance with applicable regulations. Key considerations include:

- **Sanctions screening**: Reevaluate counterparties, supply chains, and financial relationships for exposure to newly listed entities.
- **Contractual review**: Examine force majeure and sanctions clauses in existing agreements.
- **Licensing and exemptions**: Determine eligibility for humanitarian or other exemptions under EU laws and regulations.
- **U.S. secondary sanctions risks**: While not a new risk, U.S. measures may still apply extraterritorially, so international companies need to reassess any potential secondary sanctions risks if dealing with Iran.

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Authors

[Cari Stinebower](#)

[Mariana Pendás Fernández](#)

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Cari Stinebower



Mariana Pendás Fernández

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