



*Mission Permanente
de la République Islamique d'Iran
Auprès des Nations Unies
et des autres Organisations Internationales à Genève*

*Ambassadeur,
Représentant Permanent*

In the Name of God, the Compassionate, the Merciful

Ref. 2050/2254310

Geneva, 25 October 2024

Dear Madam Special Rapporteur,

In steadfast pursuit of our collective commitment to uphold international human rights standards, I hereby convey profound concern regarding the most recent unlawful sanctions imposed by the European Union upon the aviation sector of the Islamic Republic of Iran. These punitive measures, formalized under COUNCIL DECISION (CFSP) 2024/2698, adopted by the European Council on 10 October 2024, mark a significant intensification of restrictive policies within the aviation field. Convened in Luxembourg, the Council of Foreign Ministers resolved to expand the list of sanctioned Iranian individuals and entities, adding seven individuals and seven entities, thereby raising the total to 19 individuals and 15 entities. Of particular note is the inclusion of Iran Air, Mahan Air, and SAHA airlines.

The breadth and scope of these sanctions touch multiple economic, financial, and logistical dimensions, as defined in the EU's guidelines on sanctions. Specifically, the sanctions mandate the blocking of assets, denial of entry into EU territories, and prohibition of financial or economic services to sanctioned entities. The EU's broad definition of '*economic resources*' encompasses all types of assets that could potentially yield financial gains, including aircraft owned by Iranian airlines, which may be subject to immediate detainment within EU airports (EU Sanctions Guideline, para 61). This obligation imposes a direct duty upon EU-based entities—such as airports—to effectively ground these aircraft through refusal of airport services, resulting in critical logistical challenges.

Moreover, under the EU's restrictive regime, sanctioned persons and entities face legally binding prohibitions that are directly enforceable by European entities without further national legislation, effectively enacting the sanctions' impact from October 14 onward. While the EU's official documentation purports to limit the sanctions' effects on people-to-people connections and air traffic, '*in general*' qualification seem to serve as a mere formality rather than a genuine commitment to facilitating essential services (See: COUNCIL DECISION (CFSP) 2024/2698 preamble para 7). In reality, this assertion does not reflect a policy inclination towards permitting aviation services but rather appears as a perfunctory compliance with EU regulations.

These actions also pose profound concerns for fundamental human rights, as enshrined in Article 13 of the Universal Declaration of Human Rights and Article 12 of the International Covenant on Civil and Political Rights, which affirm the right to



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freedom of movement. The practical consequences of these sanctions severely impede ordinary Iranians' right to travel freely, constituting a violation of these rights. The Human Rights Council, in its resolutions (A/HRC/27/21, para 4), has explicitly recognized that such coercive measures obstruct trade relations between nations, hinder comprehensive socio-economic development, and adversely affect the welfare of populations in sanctioned countries.

Your previous reports have aptly documented these detrimental impacts, underscoring the severity of sanctions on Iran's aviation sector and the resulting human rights implications. Restrictions on international financial transactions have made it nearly impossible for Iranian aviation organizations to secure necessary funding, rendering procurement of life-saving search-and-rescue helicopters, medical air services, and equipment for disaster response unfeasible. This is especially troubling in a country with significant seismic activity, where access to emergency aerial services is essential for public safety. Moreover, sanctions have hindered routine aircraft maintenance and procurement of essential spare parts, putting civilian lives at risk and stifling industry sustainability (A/HRC/51/33/Add.1: Visit to the Islamic Republic of Iran - Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan, paras 51-54).

Given the deepening impact of these sanctions on the Islamic republic of Iran's aviation sector, the safety of aircraft, and the fundamental rights of the Iranian people, I respectfully urge you to continue highlighting the grave implications of such measures in your forthcoming reports.

Thank you for your continued attention to this matter.

Yours sincerely,
Ali Bahreini

Professor Alena Douhan
Special Rapporteur on the Negative Impact of Unilateral Coercive Measures
on the enjoyment of human rights