

**IRAN FACT RECORDS' Response to
Special Rapporteur on the negative impact of the unilateral
coercive measures on the enjoyment of human rights'
Call for input – Visit to the Islamic Republic of Iran**

Ms. Alena Douhan
Special Rapporteur on the negative impact of the
unilateral coercive measures on the enjoyment of
human rights
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Before answering the 12 questions put forward by the Special Rapporteur, we should clarify the following:

1. Barring the three visits made by Special Rapporteur Reynaldo Galindo Pohl between 1990 to 1992 and one visit made the Special Rapporteur Maurice Copithorne in 1996 to Iran[†], the Islamic Republic regime has denied all *UN's Special Rapporteurs on the situation of Human Rights in Iran* entry into Iran. Since the re-establishment of the mandate in 2011, Special Rapporteurs Ahmed Shaheed, Asma Jahangir and Javaid Rehman have repeatedly been refused entry into Iran and not a single visit has been tolerated by the regime. Given this fact, it should not be too difficult to see how the Islamic Regime's eagerness to facilitate your visit to Iran can be worrisome to many Iranians. As an example, and as you are aware, the Iranian Nobel Peace Prize Laureate Shirin Ebadi [has publicly called for the postponement of your visit](#) until the Islamic Republic lets in the UN Special Rapporteur on Human Rights.

[†]Correction: an earlier version of this letter failed to mention the 1996 visit by Special Rapporteur Maurice Copithorne to Iran. [In an interview](#), Mr. Copithorne pointed out the visit and mentioned that after the publication of his report, the Islamic Republic authorities never again allowed him to enter the country.

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2. Adding to the worries surrounding the circumstances of this visit, we are further distressed by the nature of the questions asked by the Special Rapporteur. The one-sided, reductionist and rhetorical framing of the questions makes any attempt at answering them virtually meaningless. The framing of the questions –at the very best– shows a complete and total neglect of the human rights abuses and crisis of impunity in Iran; reducing decades-long policies of human rights abuse and widespread, systemic and structural corruption by the state to external factors. We would like to clarify that we find these questions misleading and at best a very incomplete and insufficient query for finding the facts.
 3. We would like to once again draw the attention of the Special Rapporteur to the decades-long systematic human rights abuses by the Islamic Republic and invite you to have these abuses in mind during your visit. The Human Rights abuses under the Islamic Republic in Iran have been ongoing since the very first days of the regime’s establishment, and as we will show here, are entirely independent from sanctions imposed on the regime by any foreign country. In this letter, we would like to draw your attention to a small sample of such abuses that are squarely unrelated to any foreign sanctions – rather, these catastrophes are often forced upon the Iranian people by the Islamic regime, depriving them of some of their most basic rights.

Response to Questions

- 1 **What specific human rights are affected by unilateral sanctions introduced against Iran? Please provide examples of violations of particular rights by unilateral sanctions.**

As it was mentioned in the introduction, the crisis of human rights abuses by the Islamic regime in Iran is not by any means a function of external effects, such as sanctions. The Iranian people have been deprived of their most basic human rights under the leadership of both Supreme Leaders, Rouhollah Khomeini and Ali Khamenei since February 1979. Without exception, all of the 13 Islamic Republic administrations (as well as the Interim government in the early days of the Islamic regime’s establishment) have been involved in various forms of human rights abuses. We would like to once again point out that framing the catastrophic state of human rights in Iran in terms of externally-imposed sanctions, or drawing any meaningful correlation between the two is at best negligent and reductive.

2 What types of sanctions have the most negative impact on the enjoyment of human rights in Iran?

As it will be elaborated on further in this letter, the Special Rapporteur must note that the “enjoyment of human rights in Iran” has been, and is routinely being stifled by the direct actions of the Islamic Republic. The state places bans and prohibitions on many personal freedoms. Islamic hijab is mandatory for women. Sale and consumption of alcohol is forbidden. Celebrating Valentine’s day in stores is forbidden. Drinking water in public in the “Holy month of Ramadan” is forbidden. For a partial list of such absurd prohibitions by the state, please see [this list](#). In the presence of such absurd restrictions and overt abuses of human rights, speaking of “negative impacts of sanctions on enjoyment of human rights” is at best completely and totally ludicrous and irrelevant.

3 What categories of population are affected by unilateral sanctions in Iran the most? Please, provide examples.

The Islamic Republic regime has ruthlessly stifled the enjoyment of nearly all human rights in Iran since its establishment in 1979. Aside from a very small clique of regime-supporting citizens – who are majority Shiite and Muslim– almost every other citizen is adversely affected by the human rights abuses inflicted upon them by the State. All women are forced to wear the mandatory Islamic hijab (as the Special Rapporteur will experience first-hand – as a woman you will be forced to wear the Islamic Hijab in Iran), Enforced Disappearance, arbitrary arrest and detention and at times execution of activists, journalists and citizens is a common occurrence. Members of the “unrecognized” faiths (such as Bahaii’s) are actively harassed by the state and their most basic rights are taken away (for instance, see the [secret 1991 government memorandum](#) obtained by the UN Special Representative on the Human Rights Situation in the Islamic Republic of Iran in 1993. The document was produced by Iran’s Supreme Revolutionary Cultural Council and personally approved by the Supreme Leader, Ali Khamenei). Non-muslims cannot run for office (barring the few designated “recognized religious minority seats” in the parliament). In short, almost every single article in the Universal Declaration of Human Rights is neglected and abused by the Islamic Republic, affecting a very vast part of the population one way or the other. We would like to invite the Special Rapporteur to look for and document these abuses.

4 Please provide detailed information on the current framework of sanction humanitarian exemptions licenses for goods and services and their specific impact on Iran’s economy and society? Do they provide for the possibility to guarantee the basic needs of the population?

We have to emphasize that the totalitarian nature of the Islamic Republic’s regime means that there is almost no transparency into the national income and public spendings and expendi-

tures. State organizations such as the “Supreme Leader’s Office”, the IRGC and its shell companies and holdings, Bonyads and Setads (vast financial empires) operate without any public oversight. Because of this complete lack of transparency, assessing and verifying the impacts of sanctions –or any other factors for that matter– on the Iranian economy is effectively impossible. The public is not aware of what parts of the economy are under sanctions. The regime routinely uses humanitarian exemptions and licenses to secure financial resources for its military operations without the public’s knowledge or oversight.

5 Is activity of international and national humanitarian actors on delivery of humanitarian aid and implementation of humanitarian and development of humanitarian projects in Iran affected by application of unilateral sanctions?

The Islamic Republic has routinely and on various occasions barred international and national humanitarian organizations from operating in Iran and delivering aid. As an example, amidst a very high surge of COVID-19 cases and a national emergency, the Islamic Republic [revoked Médecins Sans Frontières \(MSF\) approval](#) for MSF’s intervention to establish a temporary hospital and manage severe COVID-19 cases in Isfahan, and subsequently [denied their presence](#). In another recent incident, the Islamic Republic [returned 820,000 doses of COVID-19 vaccines](#) amid vaccine shortages, ostensibly because they had been “originating from the USA”.

Perhaps one of the most outrageous displays of disregard for the Iranian life, was the Supreme Leader Ali Khamenei’s [speech on January 8, 2021](#) amid surging COVID-19 death tolls in which he very explicitly and plainly [banned the import](#) of all “American and British” vaccines. He proclaimed: “The import of American and English vaccines to the country is hereby forbidden. I have declared this to the authorities [in private] and now say it publicly as well. [...] If they [the Americans] can make vaccines, if their Pfizer factories can make vaccines, why do they want to give us any of their vaccines? They should consume it themselves. Same with the British.”

As usual, the regime’s propaganda machine –specially the overseas branch– made an attempt to blame the sanctions for the non-existence of vaccines and the tragically high COVID-19 death tolls in Iran. But the unusual explicitness of Khamenei’s remark made this point moot. The Islamic regime officials often attempt to not discuss or document such bans publicly, for this exact same reason. This one case, announced by the highest ranking Islamic regime official, clearly demonstrates how irrelevant the sanctions are to the decades-long pain and suffering of the Iranian people under the Islamic regime.

6 Please provide information on the impact of sanctions on vulnerable social groups, including unemployed people and those lacking social protections, people with disabilities, older people in Iran? Please provide information on the particular impact of unilateral sanctions on women and children.

As it was pointed out in the previous answers, a very large majority of the Iranian citizens are directly suffering from the criminal policies of the Islamic regime. Vulnerable social groups only become a concern for the regime when they rise up to complain about these injustices. The world witnessed how the regime slaughtered hundreds of peaceful protests on the streets of Iran over the course of 3 days in [November 2019](#). The Islamic regime's bloody oppression of the Iranian people in general, and vulnerable groups in particular, has been ongoing from the very early days of the Islamic regime's establishment.

7 What measures have been taken by the Government of Iran to mitigate the adverse effects of unilateral sanctions? Please provide information on specific measures, including social support programmes, initiatives towards economic restructuring, changes in trade policies and others?

On January 16, 2016, the Iran nuclear agreement (JCPOA) was implemented and all the international and unilateral sanctions related to the Islamic Republic's nuclear program were lifted. Given all the propaganda by the state blaming the sanctions for the economic crisis, some people in Iran expected that the implementation of the agreement would mean improving life conditions. This of course was false, and the living conditions continued to get worse, similar to the years prior, due to systematic corruption and mismanagement within the regime. [Khamenei explicitly banned](#) some US companies from entering the Iranian market. The worsening living conditions in Iran, combined with the exposure of a [series of high profile](#) and often [astronomical corruption cases](#), led to one of the [largest protests and bloodiest crackdowns in Iranian history in December 2017 - January 2018](#). Please keep in mind that the JCPOA was still in effect at this point and the Trump administration did not withdraw from the agreement until May 2018. The protests were largely held in small cities and towns across Iran, as well as in the slums around larger cities. The victims were from some of the most vulnerable and impoverished groups in the country.

The Islamic regime's method of choice to "mitigate" all economic and social problems has always been oppression and crackdown. In the last year alone, labor groups and factory workers [have been suppressed](#), peaceful demonstrations by farmers demanding water have been [violently cracked down](#) (leading to deaths and several people losing their eyes due to the use of shotguns on civilians), [protests by teachers](#) for better pay have been violently suppressed and many teachers have been arrested and detained, [gatherings of retirees](#) have been harshly cracked down, with older age men and women being dragged in the streets and arrested.

8 How is the private sector in Iran affected by the application of unilateral sanctions?

In recent months and years, various Islamic regime authorities have made claims about what percentage of the Iranian economy is private. In one of the most recent of these claims, the Islamic regime's speaker of the parliament and former IRGC general, Bagher Ghalibaf, [claimed that](#) 90% of the Iranian economy is controlled by the state. Other officials have made similar claims about the astonishingly small percentage of the "private" sector. While in keeping with Islamic regime's policy there is very little transparency to know for sure, based on these proclamations by high-ranking officials one might be able to project what a small percentage of the Iranian economy is outside the direct control of the Islamic state. The IRGC, Ali Khamenei's office and his associated Bonyads and Setads own and control the vast majority of the Iranian economy. The majority of this wealth comes from oil money and sale of other national and natural resources and confiscation of private property by the Islamic state over the past 43 years. This lack of transparency once again makes it impossible for an outsider to know how and where the sanctions have had their impacts.

9 Could you please provide examples of zero-risk policies and over-compliance with unilateral sanctions by any actor (public or private), such as banks and other businesses, which may prevent even permitted interactions with Iran, its institutions and various economic sectors? What human rights are affected by such types of conduct?

Despite the favorite narrative of the Islamic regime about the outsized impact of sanctions, we would like to once again point out that the reluctance of international financial institutions and banks in working with Iran could be unrelated to unilateral US sanctions. For this, we need not look further than the reports by the *Financial Action Task Force (on Money Laundering) - FATF*. Between 2016 to 2020, the Islamic Republic played a hide and seek game with the organization; committing to enforcing actions, and then refraining from implementing them. After 4 years of back and forth and providing the Islamic regime with extensions, the [FATF concluded](#): "[...] given Iran's failure to enact the Palermo and Terrorist Financing Conventions in line with the FATF Standards, the FATF fully lifts the suspension of counter-measures and calls on its members and urges all jurisdictions to apply effective counter-measures, in line with Recommendation 19". It is not, therefore, too difficult to imagine why a reputable bank would refrain from having any ties with a country whose regime refuses to take the most basic measures to ensure Terrorism is not funded.

It is worthwhile to note that once again, Ali Khamenei is on the record [discouraging the Islamic parliament](#) from joining the Anti-Terrorist-Financing and Anti-Money-Laundry conventions. Although in this case, instead of overtly making a clear-cut statement (similar to his outright ban on "American and English" vaccines) he is making vague requests and placing the burden on various parts of his regime in order to deflect responsibility for the failures.

10 How does the implementation of unilateral sanctions affect migration / rights of migrants from / to Iran?

The aforementioned disastrous policies of the Islamic regime over its entire existence have forced many Iranians to leave Iran in the past 43 years. Furthermore, particularly in recent years, the number of Afghanistani refugees leaving Iran has spiked. The Turkish government's megaproject in building a border wall between the two countries is a clear indication of this increase in migration from Iran. As stated earlier, the Islamic Republic has refused to join the Palermo Convention (i.e. *The United Nations Convention against Transnational Organized Crime*) and is among the [handful of states that is not a party to the accompanying protocol against human trafficking](#) (*Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children*). Human Trafficking and incidents leading to death of migrants through Iran have also increased significantly in recent years. Unfortunately, the Islamic Republic's refusal to join the Palermo Convention has allowed it to keep the reality of human trafficking in Iran opaque and unaccessible. Due to this lack of transparency, it is impossible for outsiders to assess the true scale of the catastrophe exerted upon migrants to and from Iran.

11 Do unilateral sanctions applied to Iran affect human rights of people beyond the territory of Iran? Please, provide specific examples.

In answering this deeply flawed question, we would like to once again highlight the inhumane and extortionist policies of the Islamic Republic. The Islamic regime has long been using hostage-taking as a tool to achieve its political and economic goals. The Islamist regime started experimenting with this policy from the very first months of its establishment; by taking [US diplomats hostage in Tehran](#). This policy has evolved over time and is now a centerpiece of the Islamic Republic's foreign diplomacy. The impunity of the regime in using hostage-taking of citizens of other countries –especially of Iranian dual nationals– to extort its counterparts has reached astonishingly absurd levels. In July 2015, and in the midst of the very last stretch of the negotiations over JCPOA, Mohsen Rezaee (former commander-in-chief of IRGC and Secretary of the Expediency Discernment Council –direct appointee of the Supreme Leader Ali Khamenei– at the time) gave an interview on Iranian state TV. [In the interview](#), Mohsen Rezaee [proclaimed](#): “If the US tries to make a military move against us, we will take at least 1000 hostages from them in the very first week; and then they will have to pay us a few billions of Dollars per hostage to release them. [...] and of course this way a lot of our economic problems may also be solved”.

As we are writing this letter, the [Islamic regime has signaled](#) that they will be executing the Iranian-Swedish Scholar and disaster medicine doctor [Ahmad Reza Djalali](#) “on May 21st, *at the latest*”. Dr. Djalali was visiting Iran in April 2016 following an invitation from the University of Tehran and Shiraz University, when he was arrested upon order of the Ministry of Intelligence and Security, without a valid warrant or reason for arrest. An observer with very moderate

knowledge of the Islamic Republic's extortionist policies will be quick to note that the regime's threat to execute Dr. Djalali is a [direct retaliation](#) for the war crimes trial of former regime's judiciary official Hamid Nouri by a court in Sweden, which ended on Wednesday. We urge Special Rapporteur Douhan to [join her colleagues](#) and call on the Islamic regime authorities to immediately stop this blatant display of violence and release Dr. Ahmad Reza Djalali.

In light of the Islamic Republic's denial of Human Rights Special Rapporteurs' visit to Iran, we expect Ms. Douhan to step up and pay close attention to and investigate such blatant abuses of Human Rights in Iran during her visit.

12 Individuals and organisations with whom the Special Rapporteur should meet during her country visit.

As any reasonable observer may realize, the totalitarian nature of the regime ruling over Iran does not tolerate dissident voices who dare to challenge its long-lasting propaganda and false narratives. Expecting the citizens living in a police state to come forward and publicly undermine such a central propaganda piece of the regime is unreasonable and shows a complete lack of understanding about the true state of affairs in Iran. Despite this, we have compiled a list of brave Iranians and experts inside and outside of the country who are willing to meet with the Special Rapporteur and provide her with on-the-ground analysis. *The list can be communicated with the Special Rapporteur in a secure manner upon her request.* We would like to make it crystal clear that in doing so, these brave citizens are risking their freedom and well-being. We hope that the Special Rapporteur realizes the scale of this sacrifice and does everything in her power to prevent the Islamic regime from identifying these sources.

In conclusion, we must once again remind the Special Rapporteur that the Islamic Republic regime has refused to allow any of the UN's Special Rapporteurs on Human Rights to enter the country since 1992. It is therefore detrimental for Special Rapporteur Douhan to use this opportunity to investigate the dire situation of human rights and the vast scale of abuses by the Islamic regime during her visit and consider these critical facts in her report.

Accordingly, and following the mandate under Human Rights Council Resolution 27/21 on human rights and unilateral coercive measures, we would like to call on the Special Rapporteur to consider and include all the relevant factors, including but not limited to systemic and structural corruption, crisis of impunity, complete lack of transparency and systemic oppression in her investigation and final report. In this regard, we invite Ms. Douhan to take the following actions:

1. To study and understand the evolution of systemic and structural corruption in the Islamic Republic since its very early days of its establishment in 1979 and its devastating impacts on the Iranian economy and the Iranian people.

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2. To take into account the total lack of transparency in almost all state functions, including but not limited to the state's income from national resources and state's expenditures in the country as well as abroad.
 3. To investigate and report on the many cases in which the Islamic regime and its leaders have willingly imposed bans on foreign aids or imports for political or financial gains. The management of COVID-19 crisis, the ban on foreign vaccines as well as other medicine and the involvement of various state financial institutions to profit from the pain and suffering of the Iranian people are vivid illustrations of this inhumane tragedy and need to be investigated and highlighted.
 4. To consider the steady decline of the Iranian economy under Islamic State's rule, regardless of sanctions. In this regard, the Special Rapporteur can specially consider the period in which JCPOA was in full effect (i.e. January 2016-May 2018). We encourage the Special Rapporteur to also focus on publicized embezzlement and corruption cases over the same period and report the results.
 5. To make a conscious effort to understand the safety concerns of the citizens and organizations in a totalitarian police state and limitations imposed upon any and all press and media. We hope that there is no further requirement for us to elaborate on how the safety and livelihood of citizens, journalists and activists can be endangered and compromised if they are found to have been challenging the official state's propaganda on the outsized effects of sanctions on the miserable state of life in Iran.

In the end, we would like to wish Ms. Douhan a safe trip to Iran and we are looking forward to reading your findings on the aforementioned topics.

Sincerely,
IRAN FACT RECORDS
May 7, 2022