

# Europe's Options to Promote Regime Change in Iran



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## **Europe's Options to Promote Regime Change in Iran**

### **EXECUTIVE SUMMARY**

The Iranian regime continues to pose a persistent and multifaceted threat to European and global security. This policy paper outlines a strategic, legal, and values-driven approach for the EU and UK to confront Iran's nuclear escalation, support for terrorism, regional destabilization, and internal repression. The upcoming expiration of the UN "snapback" sanctions mechanism (under UNSC Resolution 2231, on 18 October 2025) marks a moment of urgency—but not the endpoint—of European engagement.

The paper identifies the escalating security threats posed by the Iranian regime to Europe and the broader international community, including its nuclear ambitions, missile proliferation, and support for terror proxies across the Middle East. It documents Iran's role in fueling regional instability, enabling Russia's war in Ukraine, disrupting maritime trade—including in the Red Sea and potentially the Strait of Hormuz—and violating international law through terrorism and ideological extremism. The regime has also been implicated in assassinations on European and U.S. soil, perpetrating terrorist attacks across Latin America, and expanding its terrorist networks throughout Venezuela and the tri-border area of Argentina, Brazil, and Paraguay.

The paper explores the international community's experience with transitional political regimes and the challenges of post-conflict stabilization, drawing lessons from key UN-led interventions in regions such as Kosovo, East Timor, and beyond. It emphasizes the role of multilateral engagement, coordinated diplomatic efforts, and capacity-building strategies in fostering democratic resilience. These examples underscore the potential for collective global action—not limited to European leadership—in addressing emerging

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security threats, countering authoritarianism, and supporting democratic transitions worldwide.

Building on these global lessons, any political transition in Iran must be rooted in the principle of internal self-determination and reflect the country's multiethnic character. Nearly half of Iran's population belongs to non-Farsi ethnic groups—including Kurds, Azeris, Baluchis, and Arabs—many of whom face systemic discrimination and political marginalization. A credible and stable transition requires meaningful representation, cultural autonomy, and constitutional recognition of this diversity. These measures are not only consistent with international legal norms, but essential to prevent internal fragmentation, counter extremist narratives, and build the foundations of democratic resilience and long-term national cohesion.

### **Recommended strategies**

The paper calls for immediate action to reimpose sanctions and designate the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organization, while also advancing a long-term roadmap for a lawful transition of governance in Iran. It underscores the need for international actors—with Europe as a key contributor—to move beyond containment and adopt a dual-track strategy that pairs nuclear deterrence with support for democratic reform. This approach recognizes the shared responsibility of the global community to uphold international law, protect human rights, and foster regional stability through principled, coordinated action. This dual-track strategy consists of the following elements:

#### **1. Immediate nuclear containment and counterterrorism enforcement**

- Trigger the snapback mechanism under UNSC 2231 through the UK, France, Germany, or the EU collectively.
- Fully reimpose UN sanctions and coordinate with the United States to restore secondary sanctions.
- Designate the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organisation under EU and UK law.

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## 2. Structured support for lawful political transition

- Promote internal self-determination and inclusive governance within Iran's existing borders.
- Support transitional governance models, constitutional reform, and credible election oversight.
- Engage with Iran's civil society and diaspora to build legitimacy and prevent power vacuums.
- Uphold Article 21 of the Treaty on European Union by aligning external action with democracy, human rights, and the rule of law, in coordination with other international players.

The paper argues that any political transition must reflect both strategic necessity and the European Union's legal obligations under Article 21 of the Treaty on European Union—to uphold democracy, the rule of law, and human rights. These principles are also embraced by democratic nations across the globe and are gradually finding resonance in authoritative, albeit non-binding, international legal instruments such as the "Responsibility to Protect". Inaction risks emboldening Iran's pursuit of nuclear capabilities and its support for terrorist activities, both of which pose a dual threat to regional and global security and may catalyze wider proliferation and destabilization across the Middle East. This underscores the urgent need for a coordinated international response.

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## 1. Purposes of this Paper

This policy paper outlines a strategic, legal, and values-based framework for addressing the Iranian regime's persistent and multifaceted threat to global security. While it focuses on the role of Europe—defined as the European Union (EU) and the United Kingdom—it situates these efforts within a wider international context. It argues that Tehran's pursuit of nuclear weapons capability, support for international terrorism, and engagement in proxy conflicts cannot—and must not—be approached in isolation. A coordinated, law-based response is essential: one that confronts the full spectrum of destabilizing activities and lays the groundwork for a peaceful transition, guided by principles of international law and designed to foster long-term regional stability.

The recent dramatic military escalation appears to have opened a new window for diplomacy and dialogue among the United States, China and Russia, creating a critical opportunity for Europe to play a more central role in relation to Iran and to act with renewed urgency and coherence. Iran's ruling regime, however, has shown no willingness to engage in constructive dialogue or de-escalation, and continues to pursue a confrontational posture.

The expiration of key provisions under UN Security Council Resolution 2231 on 18 October 2025—particularly those that enable the simplified reimposition of sanctions (“snapback”)—creates a moment of acute urgency. However, this deadline should not define Europe's approach. Rather, it should serve as a catalyst for the EU and the UK to act decisively in support of a broader, long-term vision: upholding international law, reinforcing deterrence, and supporting a peaceful transition in Iran.

Specific security threats posed by the regime to the international community include:

- i. Pursuit of a military nuclear program aimed at producing a stock of atomic bombs combined with the development of long-range missiles capable of threatening major world capitals.
- ii. Building a strategic capability of intercontinental ballistic missiles, aimed at producing tens of thousands of missiles designed to carry conventional and non-

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conventional warheads, capable of reaching major world capitals and every spot in Europe.

- iii. Creating the “ring of fire” in the Middle East –through financial, strategic and logistic support to terror proxies and allied organizations, such as Hezbollah in Lebanon and Hamas and Islamic Jihad in the Gaza Strip and West Bank, with the purpose of eliminating the Jewish State of Israel.
- iv. Direct provision of drones and missiles to Russia for use in the Ukraine war, resulting in the death of thousands of innocent civilians on European soil.
- v. Sustained support for Russia’s military campaign, enabling continued aggression.
- vi. Operating an international terror network for planning and executing assassinations, including on U.S., Latin American, and European soil.
- vii. Regional subversion aimed at toppling moderate regimes in the Middle East and seizing control of Western-allied states.
- viii. Substantial disruption of global maritime trade thorough the Houthi proxies in the Red Sea and the Strait of Hormuz.
- ix. Promotion of extremist Islamic ideology in African and Western countries, including university campuses.
- x. Severe and persistent violation of UN Security Council Resolutions by itself or its proxies, including UNSC Resolution 1373 (2001) aimed at preventing and punishing acts of international terrorism.

#### Framework of strategic and legal objectives

The objectives below translate the paper’s core message into actionable principles—which are anchored in international law and consistent with Europe’s legal commitments under Article 21 TEU.



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- **Apply lessons from UNSC Resolution 1929 (2010)**, which imposed sanctions on Iran for its refusal to halt its uranium enrichment and ballistic missile programmes but failed to address the regime’s support for proxies in the Middle East and its global sponsorship of terrorism—a mistake that Europe must avoid this time.
  - **Highlight the expiration—effective 18 October 2025—of key provisions under UNSC Resolution 2231**, which endorses the Joint Comprehensive Plan of Action (JCPOA) and establishes the “snapback” mechanism for automatic reimposition of sanctions—as a critical prompt for Europe to act with heightened urgency and coordination, while remaining focused on a comprehensive, long-term strategy rather than short-term reactive measures.
  - **Articulate Europe’s broader responsibility at this critical juncture** not only as a strategic stakeholder in non-proliferation, but also as a normative actor legally bound under Article 21 of the Treaty on European Union to promote democracy, the rule of law, human rights, and respect for international law in its external actions. This dual-track responsibility—confronting both nuclear proliferation and domestic repression—supports the need for coordinated international engagement, where Europe contributes not only sanctions but a principled, forward-looking framework for peaceful political transition.
  - **Urge both the EU and the UK to formally designate the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organization**, in line with its continued role in orchestrating terrorism, regional destabilization, and human rights abuses, which pose a direct threat to European and international security.
  - **Provide an analysis of the principle of internal self-determination** on the basis of which Iran’s multiethnic society can claim political voice and systemic reform—without fragmenting the country’s territorial unity.

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- **Explore internationally supported transitional governance models**—such as those applied in Kosovo and Timor-Leste—to guide Iran through a peaceful, post-authoritarian transition.
  - **Outline possible legal modalities for a potential transitional period in Iran**, including constitutional reform, minority inclusion, election oversight, and the peaceful transfer of authority under international law, leading to internal self-determination.
  - **Provide the EU and its institutions with a toolkit of instruments** to help secure regional stability and support Iran’s transition.

**A caveat is in order at this early stage.** While a change in governance may be pursued as a strategic objective, it must be fundamentally understood as a political decision rather than a strictly legal one. Nevertheless, such a decision carries **deep legal dimensions**—particularly for the European Union, whose external actions, as noted earlier, are governed by Article 21 of the Treaty on European Union, which legally obliges the Union to promote democracy, the rule of law, human rights, and respect for international law.

This creates a dual imperative: any initiative aimed at supporting political transition must not only reflect strategic interests but also remain grounded in the Union’s legal and normative commitments. The legal foundation is clear; the political will to act upon it remains a matter of choice. Any such action must be carefully calibrated to ensure consistency with international law, proportionality, and the overarching principles guiding the EU’s external policy. This paper is therefore not a detached academic exercise, but a strategic-legal contribution intended to support informed and lawful policymaking within the bounds of the EU’s external mandate.

## 2. Understanding the Anatomy of Iran’s Multidimensional Threat

Since the Islamic Revolution of 1979, Iran has functioned as an abnormal state actor. Its regime operates under a dual structure: a nominal civilian government overshadowed by the supreme authority of the Ayatollah and the entrenched power of the Islamic

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Revolutionary Guard Corps (IRGC).<sup>1</sup> This hybrid configuration has eroded both Iran’s international credibility and its internal rationality.

The IRGC, functioning as a state within a state, exerts control over vast sectors of Iran’s economy and commands extraterritorial forces such as the Quds Force. Through this apparatus, Iran systematically employs international terrorism, asymmetric warfare and proxy militias as instruments of regional influence and strategic disruption.<sup>2</sup> Its pursuit of nuclear weapons capability further amplifies the threat posed by its state-sponsored terrorism, creating a volatile nexus of ideological extremism and weapons proliferation.

Domestically, the regime relies on the repression of dissent—particularly the systemic violation of women’s rights—as a deliberate mechanism of internal control and regime preservation. This internal authoritarianism is mirrored in its external belligerence, where the export of instability serves to deflect from its domestic illegitimacy.

Despite the recent dramatic military escalation targeting its nuclear weapons facilities, the regime has shown no intention of relinquishing power or engaging in meaningful political reform. On the contrary, it appears poised to further entrench its authoritarian grip. Most alarmingly, on 2 July 2025, the Iranian government announced the suspension of its cooperation with the International Atomic Energy Agency (IAEA)—a move that significantly undermines international oversight and raises urgent concerns about the regime’s nuclear intentions.<sup>3</sup>

This defiance sets the stage for a deeper examination of Iran’s nuclear posture and the impending expiration of the “snapback” mechanism under United Nations Security Council Resolution 2231. These issues will be addressed in the next section.

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<sup>1</sup> See generally thinc., *Legal Conditions for Inclusion of the Islamic Revolutionary Guards Corps (IRGC) on the European Union Terror List: White Paper* (1 July 2024). <https://thinc-israel.org/irgc-on-eu-terror-list/>

<sup>2</sup> *Ibid.*

<sup>3</sup> Jon Gambrell, “Iran’s president orders country to suspend cooperation with nuclear watchdog IAEA,” *AP* (2 July 2025).

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### 3. Expiration of the “Automatic Snapback” Mechanism under UNSC 2231 and Iran’s Nuclear Stockpile

The expiration of the “snapback” mechanism under United Nations Security Council Resolution 2231 marks a pivotal moment in the international community’s ability to constrain Iran’s nuclear ambitions. Adopted in 2015 as part of the Joint Comprehensive Plan of Action (JCPOA), Resolution 2231, under Article 41 of the UN Charter, included a provision allowing any participant state to unilaterally reimpose UN sanctions—commonly referred to as the “snapback”—in the event of Iranian non-compliance.<sup>4</sup> Although the United States withdrew from the JCPOA in 2018, other participant states—namely the United Kingdom, France, Germany, Russia, China, and the European Union—formally remained committed to the agreement. The snapback mechanism was designed as a safeguard to deter Iran from breaching its nuclear commitments. However, the automatic expiration of this provision in October 2025 eliminates a key enforcement tool at a time of heightened uncertainty surrounding Iran’s nuclear programme.

Unlike standard UN Security Council procedures, the snapback mechanism in Resolution 2231 is expressly designed to circumvent the veto power of permanent members. When any participant state claims Iranian non-compliance and triggers the mechanism, the Council is obligated to vote within 30 days on a resolution to maintain sanctions relief, as per Article 37 JCPOA. Crucially, if the resolution fails—whether due to inaction or a veto—then all previously lifted UN sanctions automatically snap back into effect.<sup>5</sup>

This legal construct, often dubbed a “reverse veto,” flipped the traditional dynamic: **instead of requiring consensus to impose sanctions, it required consensus to prevent their reimposition.** As a result, no single UNSC permanent member could unilaterally

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<sup>4</sup> Article 41 is under the framework of Chapter VII of the UN Charter: “**Action with Respect to Threats to the Peace, Breaches of the Peace, and Acts of Aggression**”.

<sup>5</sup> “The snapback process is designed to avoid the need for consensus among the five permanent members of the Security Council... Once the measure is triggered... Iran’s relief from UN sanctions would expire within thirty days unless the council passes a resolution to continue it. And any permanent member can veto said relief resolution, making snapback difficult to halt....” Henry Rome and Louis Dugit-Gros, “Snapback sanctions on Iran: more bark than bite?” *The Washington Institute for Near East Policy*, (25 October 2022).

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block the return of sanctions, fundamentally altering the legal balance of power within the Council. With the JCPOA's expiration, this unique mechanism ceases to exist—removing a key legal lever once available to participants to enforce compliance.

The expiration of the snapback mechanism not only weakens the legal architecture of non-proliferation but also emboldens Tehran to accelerate its nuclear breakout timeline without fear of automatic multilateral consequences. With no viable enforcement mechanism remaining under the JCPOA framework, Iran would be operating in a strategic vacuum—unchecked, unmonitored, and increasingly unrestrained.

This moment demands urgent international attention. **The erosion of the JCPOA's enforcement provisions, coupled with Iran's defiance and opacity, has created a perfect storm of nuclear risk.** The international community must now confront the reality that the diplomatic architecture designed to contain Iran's nuclear programme is no longer fit for purpose. In case of termination of the JCPOA, Iran would only abide by the default provisions of the Nuclear Non-Proliferation Treaty, which it acceded to in 1970.

#### Procedure for triggering the snapback mechanism under the JCPOA

Articles 36 and 37 of the Joint Comprehensive Plan of Action (JCPOA) establish a two-stage procedure for triggering the snapback sanction mechanism:

- **Article 36** outlines a multi-step process starting with consultations within the Joint Commission, potentially escalating to ministerial consultations and the involvement of an advisory board. The language uses the conditional verb “could,” indicating that these steps are sequential but **not legally mandatory**.
- **Article 37** provides that if a participant determines that an issue constitutes “significant non-performance” and the matter remains unresolved despite 30-day “good-faith efforts” to resolve it, the participant may refer the issue to the UN Security Council. This referral can trigger the **automatic re-imposition of sanctions** (or snapback) under UN Security Council Resolution 2231.

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- Importantly, as explained earlier, **the UN Security Council members with veto power cannot block the reinstatement of sanctions once this mechanism is properly triggered.**
  - For private sector companies doing business with Iran, sanctions re-imposed under the snapback mechanism **will not apply retroactively** to contracts signed before the sanctions are reinstated, provided those contracts comply with the JCPOA and relevant UNSC resolutions. **Latest developments: Will France, Germany, and the UK (E3) really trigger the Snapback mechanism?**

According to media reports dated 15 July 2025, France, Germany, and the United Kingdom (the “E3”) have announced that they will begin the process of reinstating UN sanctions on Iran starting 29 August, unless Tehran makes “firm and tangible” progress in curbing its nuclear programme by that date.<sup>6</sup> The decision was coordinated in a recent conference call held by the ministers of foreign affairs of those countries and U.S. Secretary of State Marco Rubio.<sup>7</sup>

The media reports did not clarify whether the E3 countries have formally lodged a complaint satisfying the requirements set out in Articles 36 and 37 of the JCPOA, as discussed above. The lack of official documentation or public statements by the E3 regarding what procedural steps have been taken raises legitimate doubt about whether the mechanism was triggered in accordance with the JCPOA framework.

On 14 July, Iran rejected the E3’s intention to activate the snapback mechanism, calling it “politically motivated and lacking legal and moral standing”. Iran alleges that its reduced compliance with the JCPOA stems from “flagrant violations” by the United States and certain other signatories.<sup>8</sup> On July 21, Iran announced plans for a meeting with

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<sup>6</sup> Amir Daftari, “Iran Makes Nuclear Threat”, Newsweek 16 July 2015, available at <https://www.newsweek.com/iran-threatens-increase-nuclear-enrichment-snapback-sanctions-2099538>

<sup>7</sup> *Ibid.*

<sup>8</sup> “Iran Vows Fitting Response To E3 Threat Of Nuclear Sanctions Snapback” MENAFM Indo-Asian News Service, 14 July 2025, available at: <https://menafn.com/1109797967/Iran-Vows-Fitting-Response-To-E3-Threat-Of-Nuclear-Sanctions-Snapback>

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Russia and China to discuss the E3's claim, which was expected to take place on July 22.<sup>9</sup>

We maintain that the assessments by the IAEA alone provide conclusive evidence of Iran's "significant non-performance" of its commitments under Article 37 of the JCPOA. Let us recall that the JCPOA was endorsed by UNSC 2231 adopted under Chapter VII of the UN Charter.

It is worth recalling that in 2020, the E3 formally rejected the U.S. attempt to trigger the snapback mechanism, arguing that the United States had withdrawn from the JCPOA and was therefore not entitled to invoke its provisions.<sup>10</sup> However, the official U.S. position at the time was that the JCPOA lacked a withdrawal clause and that the United States maintained its status as a JCPOA member under UNSC Resolution 2231, which remained unaltered.<sup>11</sup>

This remains a key issue, governed under Chapter VII of the UN Charter, where legal ambiguity is not academic but consequential. In the absence of procedural clarity, the snapback question risks becoming a fault line in international diplomacy, with direct implications for global peace and security.

#### 4. Is There a Re-alignment of Forces Among World Powers on the Iran Proliferation Issue?

In the aftermath of the recent U.S. air strikes on Iran's nuclear facilities at Fordow, Natanz, and other key sites, the Director General of the International Atomic Energy

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<sup>9</sup> Emma De Ruiter "Iran to consult with Russia and China ahead of Friday nuclear talks with European nations" EURONEWS, 21 July 2025, available at: <https://www.euronews.com/2025/07/21/iran-to-consult-with-russia-and-china-ahead-of-friday-nuclear-talks-with-european-nations>

<sup>10</sup> Tymahz Toumadje "How Does the E3 Initiate Snapback Sanctions" NUDFI, 23 May 2025, available at: [https://nufdiran.org/policy\\_briefs/how-does-the-e3-initiate-snapback-sanctions-2/](https://nufdiran.org/policy_briefs/how-does-the-e3-initiate-snapback-sanctions-2/)

<sup>11</sup> Paul K. Kerr "Iran's Nuclear Program and U.N. Sanctions Reimposition". Congressional Research Services" Updated 23 September 2022, available at: [http://congress.gov/crs\\_external\\_products/IF/PDF/IF11583/IF11583.20.pdf](http://congress.gov/crs_external_products/IF/PDF/IF11583/IF11583.20.pdf)



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Agency (IAEA), Rafael Grossi, addressed the UN Security Council and declared: “*We have a window of opportunity to return to dialogue and diplomacy.*”<sup>12</sup>

Grossi’s expression of optimism—delivered amid a backdrop of dramatic escalation—signals a potentially significant shift in the nuclear dialogue. His stance arises from a convergence of factors.

The scale and precision of the recent U.S. strikes appear to have recalibrated regional threat perceptions and partially restored Western deterrence credibility. In the wake of this shift, subtle yet significant signals from the United States, China, and Russia—likely shaped by discreet backchannel diplomacy—suggest an emerging, implicit understanding of the urgent need to halt a dangerous slide toward global nuclear proliferation.<sup>13</sup> These actors now seem open to leveraging the IAEA’s strategic role in fostering constructive dialogue, grounded in a shared recognition that military solutions offer no sustainable path forward amid escalating nuclear tensions. Grossi’s pragmatic outlook—honed through years of navigating the complex intersection of technical oversight and geopolitical strategy—adds weight to his assessment.

While these recent signs of convergence among major powers suggest the possibility of renewed diplomatic engagement, the true **litmus test** of this apparent emerging alignment lies in whether the JCPOA participants will align their efforts in reinstating sanctions on Iran.

#### Risk of inaction: A cascade of proliferation and instability

Failure to act before this deadline would represent not only a legal failure, but also a political one—signaling that even minimal consensus cannot be translated into concrete enforcement. If no action is taken, the international community will forfeit a unique and time-sensitive mechanism designed to prevent nuclear escalation. The diplomatic window

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<sup>12</sup> Statement by the IAEA Director General before the United Nations Security Council, 22 June 2025, available at: <https://digitallibrary.un.org/record/683939?ln=en&v=pdf>

<sup>13</sup> Sophia Yan, “Why Putin and Xi will be panicking over Iran,” *The Daily Telegraph* (16 June 2025).

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may be open, but its credibility now depends on whether it produces results while the enforcement framework remains legally available.

The broader risk of proliferation must also weigh heavily on global powers. If Iran resumes or accelerates its nuclear programme unchecked, regional rivals such as Saudi Arabia, the United Arab Emirates and Egypt will likely pursue their own nuclear capabilities, effectively ending the Middle East's non-proliferation regime. This scenario is not hypothetical—it is a near certainty, and it would trigger a cascade of instability with global repercussions. The apparent shared interest of the United States, China and Russia in avoiding such an outcome is one of the few points of convergence that Europe must now leverage.

Here, Europe—through the UK, France, Germany and the EU itself—can play a vital role in building unanimous consensus to trigger the snapback sanctions mechanism—a crucial step toward halting Iran's uranium enrichment activities and, by extension, its nuclear weapons ambitions. Reimposing UN sanctions under this mechanism would have wide-ranging practical consequences: it would reinstate previous Security Council resolutions, including bans on arms transfers, restrictions on maritime transport and insurance, and prohibitions on the export of dual-use goods. Financial sanctions would also return, targeting Iran's banking sector, limiting access to international financial systems, and freezing assets abroad. In parallel, the United States would likely reassert its [secondary](#) sanctions regime, which penalizes foreign companies and financial institutions that engage with sanctioned Iranian entities—even if they have no direct ties to the U.S. market. This would force international firms to choose between doing business with Iran or retaining access to the U.S. financial system, thereby amplifying Iran's economic isolation and deterring investment across key sectors.

Yet while nuclear containment remains urgent, it cannot be the sole pillar of Europe's Iran policy. A sustainable and values-driven approach must also address the regime's internal repression and the aspirations of the Iranian people.

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## 5. Europe's Role on Iran Beyond the JCPOA: Advancing Human Rights and Democratic Aspirations

Beyond its central role in nuclear containment, Europe has a broader responsibility—and opportunity—to shape a principled and strategic approach towards Iran. The European Union, alongside key member states such as France, Germany and the UK, should adopt a dual-track policy that not only addresses nuclear non-proliferation, but also actively supports the Iranian people's demands for human rights, civil liberties, and democratic governance.

Europe faces a moment of strategic and moral clarity. For over a decade, its approach to Iran has been defined by a preference for nuclear diplomacy over confrontation—anchored in the belief that engagement could moderate Tehran's behavior. That status quo is no longer tenable. The events of recent weeks have confirmed that the Islamic Republic's leadership sees diplomacy not as a pathway to reform, but as a tactical shield behind which to expand terrorism, repression, and nuclear capability. The recent military strikes by the United States and Israel did not eliminate these threats, but they have created a diplomatic and legal opening that Europe must not waste.

It is time to abandon illusions about the Iranian regime's intentions. Its legitimacy has eroded beyond repair—internally, through decades of brutal repression and systemic human rights violations, and externally, through its active sponsorship of proxy militias and extraterritorial terrorist plots, some of which have targeted European soil.<sup>14</sup> The status quo is no longer tenable. Nor is containment a viable option. What is required is a structured, peaceful transition—rooted in international law and supported by a coherent European strategy.

While the United States, Russia, and China now appear aligned in their pursuit of regional stability and non-proliferation, Europe must recognise that stability alone is not enough. The EU and UK must ensure that stability is coupled with a principled commitment to

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<sup>14</sup> thinc., White Paper on the IRGC (2024). <https://thinc-israel.org/irgc-on-eu-terror-list/>

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human rights. This is not a moment for technocratic balancing. It is a test of Europe's capacity to act according to its own foundational norms.

As discussed, the JCPOA may help to halt Iran's nuclear proliferation, but will not bring any improvement on the record of domestic human rights violations by the regime

A coordinated international response—drawing on the respective strengths of Europe, North America, and global democratic partners—is crucial to supporting a lawful and peaceful political transition in Iran. The EU and UK, in alignment with the United States and others, offer institutional experience, diplomatic frameworks, and normative influence that can help reinforce a transition grounded in international law and systemic stability. External actors should enable and legitimize domestic reform—supporting Iran's multiethnic society in its pursuit of internal self-determination, inclusive governance, election oversight, and constitutional renewal.

Such efforts must be anchored not in geopolitical ambition but in values that transcend borders: democracy, the rule of law, human rights, and the core tenets of the United Nations Charter. These principles, affirmed in Article 21 of the EU Treaty and embraced by multiple regional blocs, stand in contrast to the current leadership in Tehran. Upholding the Iranian people's aspirations for lawful governance is consistent with broader commitments to international justice and regional security. While external support may be justified in exceptional circumstances—particularly when global peace and security are at risk—this paper does not endorse foreign intervention in another state's internal affairs as a matter of routine policy. Instead, it emphasizes enabling domestic reform efforts consistent with international norms. In this vein, the doctrine of the Responsibility to Protect (R2P)—while not binding—offers an ethical framework through which global actors may support populations facing systematic rights violations, particularly where state structures themselves are the perpetrators.

A failure to act decisively now would not only enable the IRGC to expand its global terrorist footprint—particularly across Europe and Latin America. In Venezuela and other parts of the region, Iran already maintains operational links, and it has previously executed deadly attacks abroad, including the 1992 bombing of the Israeli embassy in

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Buenos Aires and the 1994 AMIA bombing, for which Argentina’s judiciary has formally blamed the IRGC and the Quds Force.<sup>15</sup> Further delay would embolden these networks and expose Europe to deeper, more coordinated threats.

Counterterrorism analysts have increasingly documented the IRGC growing entanglement with transnational organized crime over the past five years. The IRGC and its Quds Force have reportedly collaborated with Afghan drug traffickers to finance proxy militias and terrorist operations across the Middle East. In Europe, Iranian intelligence and IRGC-linked operatives have cultivated ties with criminal gangs in Sweden and Germany—most notably the Foxtrot and Rumba networks—to carry out attacks on Israeli and Jewish targets. In a particularly brazen case, U.S. authorities charged two individuals in 2011 for plotting to assassinate the Saudi ambassador in Washington, D.C., using operatives linked to the Mexican drug cartel Los Zetas. The plot was allegedly orchestrated by elements of the Quds Force, highlighting the IRGC’s willingness to outsource violence to criminal syndicates far beyond the Middle East.<sup>16</sup>

In sum, as emphasized earlier, Tehran’s pursuit of nuclear weapons capabilities, support for international terrorism, and engagement in regional proxy conflicts cannot—and must not—be treated in isolation.

#### Addressing the “hostage strategies” as a tool of coercive diplomacy

Since the very beginning of the Islamic Revolution, it has been a consistent policy of the Islamic Republic to take Western nationals hostage while they are visiting Iran. This tactic remains a key instrument of leverage for the regime.

There should be a common and coordinated international policy to address this issue—such as issuing strong and explicit travel warnings, or even imposing travel restrictions

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<sup>15</sup> thinc., White Paper on the IRGC (2024). <https://thinc-israel.org/irgc-on-eu-terror-list/> page 49. Also Argentine court ruling: Cámara Federal de Casación Penal, CFCP, Sala II Causa n° CPF 9789/2000/TO1/CFC3 “Galeano, Juan José y otros s/ Recurso de Casación.

<sup>16</sup> Yoram Schweitzer and Anat Shapira, “Iran’s involvement in the international terrorism arena,” *Institute for National Security Studies* (Tel Aviv, July 2025).

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for citizens travelling to Iran—especially given that governments cannot guarantee their safety.

Publicly and firmly discouraging travel to Iran would send a clear message and help limit the regime’s ability to use innocent visitors as political bargaining chips.

#### Security of navigation

Another urgent geopolitical concern is the security of the Strait of Hormuz, through which a significant portion of the world’s oil supply flows. Any prolonged instability in Iran risks disrupting maritime traffic and energy markets, with immediate consequences for Europe, China, and the global economy. Ensuring freedom of navigation in this critical waterway must be a central objective of any transition strategy—further reinforcing the need for a stable, rules-based political order in Tehran.

#### Transition without collapse: Learning from the Arab Spring

At the same time, Europe must recognise that the memory of the Arab Spring—which swept across Tunisia, Syria, Libya, and Yemen—remains fresh, particularly for international actors such as Russia and China.<sup>17</sup> Any proposal for governance transition must be accompanied by firm assurances that this will not become a repeat of past destabilisations. The path ahead is not one of collapse, but of legal continuity and internal transformation. Europe must persuade Moscow and Beijing that it is committed to an orderly and law-based transition in Iran—one that affirms internal self-determination, protects territorial unity, and ensures a stable political framework. In particular, it must be clear that China’s long-term access to Iranian oil and gas resources will not be jeopardised by a shift toward lawful and representative governance.<sup>18</sup>

For Europe, a regime collapse without a managed transition risks triggering a new wave of illegal migration and regional destabilisation that could spill over into its borders. A

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<sup>17</sup> *Making Sense of Iran*, Sallux–ECPP Foundation in partnership with Oxford House Research Ltd., 2025, pp. 139–160, available at: <https://sallux.eu/Making%20sense%20of%20Iran%20download.pdf>.

<sup>18</sup> *Ibid.*

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stable legal framework and predictable political landscape serve not only Iranian citizens, but global stakeholders alike.

Europe has supported transitional processes in other post-authoritarian contexts—from the [Balkans](#) and [Georgia](#) to [Belarus](#) and [Ukraine](#). However, the challenge in Iran is significantly greater. It involves not only internal repression but also an entrenched security-theocratic regime with nuclear ambitions and a sophisticated network of global proxies. Tehran’s destabilizing role extends across the Middle East, Africa, and the Americas—making the stakes higher than in any previous transition Europe has engaged with. The IRGC’s designation as a terrorist entity by both the EU and UK would mark an essential step in aligning counterterrorism policy with geopolitical reality.<sup>19</sup>

Europe must not miss this opening. Stability in the Middle East cannot be restored while Iran remains in the hands of a regime that thrives on crisis. What is now required is a decisive European leadership—one that recognises that law, diplomacy and deterrence are not mutually exclusive but mutually reinforcing. A structured, internationally supported transition in Iran is not only possible—it is, under the present circumstances, urgent.

Guided by the principle of internal self-determination, as recognized in international law, Europe’s constructive engagement should be seen as only the first step in a broader process of inclusive reform within Iran’s national framework. By fostering dialogue with Iran’s ethnically and culturally diverse communities, and by encouraging responsible engagement with legitimate opposition groups—both domestic and diaspora-based—Europe can help support transitional governance models grounded in local priorities and respect for institutional integrity. Ultimately, however, **it is the Iranian people who must lead and sustain this process**—ensuring its legitimacy through broad civic participation, meaningful constitutional reform, and effective protection of minority rights.

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<sup>19</sup> thinc., White Paper on the IRGC (2024). <https://thinc-israel.org/irgc-on-eu-terror-list/>



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## 6. Frameworks for Democratic Transition and Constitutional Redesign

Europe's role in supporting a lawful transition in Iran must be grounded not only in principle, but also in precedent. The international community has navigated comparable transitions before—each with its own complexities, yet all offering valuable lessons. From Kosovo and East Timor to South Africa and Namibia, these cases demonstrate that democratic transformation is possible when anchored in structured, inclusive, and internationally supported processes.

### Learning from other transitions: Four precedents for lawful transformation

Europe's approach to supporting a democratic transition in Iran should be informed by past international experience. Four cases—Kosovo, East Timor, South Africa, and Namibia—offer instructive examples of how to manage complex transitions through lawful, inclusive, and internationally supported frameworks.

#### 6.1 Kosovo: UNMIK and Supervised Self-Government

The establishment of the United Nations Interim Administration Mission in Kosovo (UNMIK) in 1999 must be understood against the backdrop of the violent fragmentation of the former Yugoslavia. Following the collapse of the Socialist Federal Republic of Yugoslavia in the early 1990s—a disintegration marked by ethnic conflict, war crimes, and contested sovereignties—the international community faced the urgent challenge of stabilising the Balkans.

Kosovo, a province of Serbia with a majority Albanian population, became the epicentre of renewed violence and ethnic cleansing in 1998–1999. In response, NATO intervened militarily, and the UN Security Council adopted Resolution 1244, establishing UNMIK as a transitional authority.

UNMIK exercised full legislative and executive authority, overseeing civil administration, justice, and institution-building. The mission was structured around four “pillars” led by the UN, EU, and OSCE, focusing on democratisation, economic development, and rule-of-law. Kosovo's 2008 declaration of independence followed

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nearly a decade of supervised autonomy, with the EU's EULEX mission continuing to support rule of law functions.

Lesson: A robust, multilateral interim authority can provide stability, legitimacy, and a bridge to self-rule—especially when backed by regional actors and international law.

## 6.2 East Timor: UNTAET and Full Transitional Governance

East Timor's path to independence was shaped by both its colonial legacy and the trauma of mass violence. A former Portuguese colony, East Timor declared independence in 1975 following Portugal's withdrawal. Within weeks, however, Indonesia launched a full-scale invasion, claiming the territory as its 27th province. What followed was a brutal 24-year occupation marked by widespread atrocities. Between 1975 and 1999, an estimated 100,000 to 200,000 East Timorese—roughly a quarter of the population—died from massacres, forced starvation, and systemic repression.

In response to mounting international pressure and a UN-supervised referendum in 1999—in which 78.5% of East Timorese voted for independence—the United Nations established the United Nations Transitional Administration in East Timor (UNTAET) under Resolution 1272. UNTAET exercised full sovereign authority from 1999 to 2002, overseeing civil administration, justice, and security. It created local governance structures, trained civil servants and police, and facilitated the drafting of a new constitution.

The transition culminated in full independence in 2002, with a peaceful handover to elected Timorese authorities.

Lesson: Direct international administration can succeed when paired with local empowerment, clear timelines, and inclusive institution-building.

## 6.3 South Africa: Participatory Constitution-Making and National Unity

South Africa's post-apartheid transition was anchored in a two-phase constitutional process: an interim constitution (1993), followed by a final constitution (1996). The process was inclusive, transparent, and participatory—engaging political parties, civil society, and the public through consultations and submissions. The final constitution

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enshrined a progressive Bill of Rights, proportional representation, and independent institutions to safeguard democracy. A Government of National Unity was formed to ensure stability during the early years of transition.

Lesson: Legitimacy stems not only from outcomes but from process. Broad participation and legal continuity can transform even deeply divided societies.

## 6.4 Namibia: Gradual Sovereignty and UN-Supervised Elections

Namibia's independence from South African rule was achieved through the 1988 Tripartite Accord, involving South Africa, Angola, and Cuba, with UN backing. The United Nations supervised the withdrawal of foreign troops and oversaw free elections under Resolution 435. A phased approach allowed for the creation of national institutions, the return of refugees, and the drafting of a new constitution. Independence was declared in 1990, with broad international recognition and domestic legitimacy.

Lesson: Gradualism, international guarantees, and regional diplomacy can enable peaceful transitions even after protracted conflict.

## 7. A Proposed Roadmap for Iran Transition

The Iranian transition will not mirror any single precedent—but the principles that underpinned successful transitions elsewhere offer a roadmap. Each case—Kosovo, East Timor, South Africa, and Namibia—demonstrates that lawful transformation is possible when international legitimacy, inclusive governance, and phased implementation converge. For Iran, these lessons may translate into the following roadmap:

### 7.1 Organise a conference with all national stakeholders

A conference should be organised with all the local stakeholders, including those who live in the diaspora, to ensure that all stakeholders get a chance to have their say and cannot later say they were ignored. This conference should be organised with the support of the UN.

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## 7.2 Establishing a Transitional Authority with International Legitimacy

Drawing from Kosovo and East Timor, Iran's transition should begin with the formation of a transitional authority—either internationally supervised or internationally guaranteed. This body must be empowered to maintain civil order, oversee public services, and prepare the ground for democratic governance. A UN Security Council resolution, or a multilateral agreement involving the EU, US, and regional actors, could provide the legal basis for such an authority. Crucially, the authority must include Iranian figures with broad domestic credibility, ensuring that it is not perceived as externally imposed.

## 7.3 Launching an Inclusive and Transparent Constitution-Making Process

South Africa's experience shows that legitimacy flows from participation. Iran's constitutional redesign must be driven by a national dialogue that includes:

- Ethnic and religious minorities (Kurds, Baluchis, Azeris, Arabs, Sunnis, etc.)
- Women's rights groups and civil society organisations
- Political dissidents and diaspora representatives
- Former regime technocrats who demonstrate a commitment to peaceful transition and democratic reform: Unlike the post-Saddam approach in Iraq, these individuals—such as civil servants, legal experts, or administrators who served under the previous regime but are not implicated in repression or corruption—can offer valuable institutional knowledge. Their inclusion can help ensure continuity in governance and prevent administrative collapse during the transition.

## 7.4 Phased Sovereignty and Sequenced Electoral Programme

Namibia's gradual transition offers a model for sequencing. Iran's electoral programme should include:

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- A clear timeline for local and national elections, monitored by international observers
  - Legal reforms to dismantle repressive institutions (e.g., the IRGC's political and economic control)
  - Capacity-building for independent judiciary, electoral commissions, and civil administration
  - Sovereignty should be transferred in stages, with benchmarks tied to human rights compliance, institutional readiness, and public trust

## 7.5 Guaranteeing Minority Rights and Preventing Fragmentation

Iran's multiethnic composition requires constitutional safeguards to prevent marginalization and secessionist pressures. Federal or decentralised governance models—adapted to Iran's context—could ensure local autonomy while preserving national unity. International actors must affirm Iran's territorial integrity while supporting internal self-determination and pluralism.

## 7.6 Economic Stabilization and Legal Certainty

No transition can succeed without economic viability. Europe should lead in:

- Offering investment guarantees and trade incentives tied to democratic benchmarks
- Supporting the unfreezing of Iranian assets under a transitional framework
- Providing technical assistance for rebuilding financial institutions and restoring investor confidence
- Legal certainty—through treaty-based guarantees and transitional legal frameworks—will be essential to attract both domestic and foreign capital.

This approach is not about exporting a model—it's about enabling a lawful, inclusive, and peaceful transformation rooted in Iran's own aspirations and international legal

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norms. Europe, with its institutional experience and normative credibility, is uniquely positioned to help shape this path.

The next section examines the composition of Iran’s opposition forces and the tenet of internal self-determination.

## 8. The Iranian Opposition and Internal Self-Determination

Iran’s opposition landscape is as complex as the society it seeks to transform. It spans a wide spectrum—reformists, civil society groups, ethnic minority movements, monarchists, secular republicans, and diaspora coalitions—each with distinct visions for the country’s future.<sup>20</sup> Inside Iran, opposition is often expressed through constrained reformist channels or grassroots activism, particularly among women, students, and ethnic minorities. Outside Iran, exiled groups operate with greater freedom, advocating for structural change, transitional justice, and new constitutional frameworks. While these actors differ in ideology and strategy, they are united by a shared rejection of authoritarian rule, including from Europe, the U.S. or other external powers, and a common demand for a political order that guarantees rights, representation, and dignity for all Iranians.

This diversity brings both democratic potential and structural challenge. Without a framework to manage competing identities and political aspirations, a post-authoritarian Iran could face renewed instability, elite fragmentation, or even territorial fragmentation. The risk is not hypothetical: the country’s history of centralised repression, coupled with deep-seated grievances among ethnic and religious minorities, has created a volatile political terrain. To navigate this complexity, Iran’s transition must be anchored in a principle that reconciles unity with pluralism. That principle is internal self-determination.

In international law, internal self-determination refers to the right of all peoples within a state to participate meaningfully in political life, preserve their cultural and linguistic

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<sup>20</sup> *Making Sense of Iran*, pp. 74–102.

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identity, and exercise forms of self-governance.<sup>21</sup> Unlike external self-determination—which implies secession and is rarely supported under international law—internal self-determination is increasingly recognised as a legal standard, particularly in multiethnic and post-authoritarian contexts. It is derived from the UN Charter, international human rights treaties, and evolving state practice. Crucially, it is not a concession from the state, but a structural obligation: a means of ensuring democratic legitimacy, preventing conflict, and upholding the dignity of all communities.<sup>22</sup>

In the Iranian context, this principle has urgent relevance. Ethnic minorities—including Kurds, Azeris, Baluchis, and Arabs—have long been excluded from meaningful participation in governance. In practice, discrimination by the regime is often directed primarily against non-Shi'a Muslims. Their languages are marginalized, their regions underdeveloped, and their political demands often met with repression.

Often, the words “ethnic minority” are associated with relatively small groups. However, that characterization does not apply to the Iranian context. Half the population of Iran is non-Farsi (non-Persian), and these minorities number in the millions—often tens of millions. Even the smallest among the major groups, such as the Baloch, represent several million people. Moreover, the Kurds, Arabs, and Baloch have militias and organised structures on the ground, which makes it irresponsible to exclude them from any political process.

A future constitutional order must address these injustices not through token inclusion, but through institutional redesign. This could include:

- Constitutional recognition of Iran’s multiethnic character
- Education in minority languages and cultural autonomy
- Regional governance structures with real administrative authority

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<sup>21</sup> Peter Hilpold, “Self-determination and Autonomy: between Secession and Internal Self-determination,” *International Journal on Minorities and Groups Rights* 24 (2017) 302-335, Brill Nijhoff, at p. 325.

<sup>22</sup> *Ibid.*, at p. 327.



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- Proportional representation in national institutions
  - Legal guarantees for religious and linguistic rights

**These measures are not only morally and politically necessary—they are legally grounded in the evolving norms of internal self-determination. They also serve a strategic function: by embedding pluralism into the constitutional fabric, they reduce the appeal of separatism and strengthen the legitimacy of the state.**

It is essential to underscore the reality on the ground: half of Iran’s population belongs to well-organised ethnic minorities whose aspirations must be accommodated to prevent a violent breakup. Ignoring their diversity and legitimate demands risks destabilisation. Crucially, most non-Farsi movements prioritise self-determination over independence, recognising the importance of avoiding chaos and violence in a post-regime Iran.

Moreover, internal self-determination offers a unifying framework for the opposition itself. It allows for ideological diversity—monarchists, federalists, republicans—within a shared commitment to democratic pluralism. It provides a common language for negotiating the future, grounded not in abstract ideals but in concrete legal principles. And it aligns with the broader roadmap outlined in this paper: a transition that is lawful, inclusive, and internationally supported.

Finally, internal self-determination is not a static concept. As Hilpold argues, it is a dynamic legal and political process—an evolving response to historical injustice and democratic aspiration. In this sense, it is not merely a safeguard against fragmentation, but a vehicle for transformation. For Iran, it offers a path toward a new political compact: one that honors the country’s diversity while preserving its unity; one that turns opposition into participation, and grievance into governance.

## 9. Legal and Political Tools for Transition

Having examined the diverse composition of Iran’s opposition and the foundational principle of internal self-determination, we now turn to the practical instruments through which a lawful and inclusive transition might be supported. Section 9 complements

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Section 7 by examining in greater detail the legal and political tools available to the international community—particularly the European Union and the United Nations—to help facilitate a peaceful transformation of governance in Iran.

#### UN-assisted interim governance structures

In situations where national legitimacy is contested or incapacitated, international law has increasingly recognised the validity and functionality of interim governance mechanisms, particularly when built upon domestic foundations but supported by international normative frameworks.

The Kosovo case remains one of the most illustrative precedents. As stated in the Written Statement of the Republic of Kosovo before the International Court of Justice in the Advisory Opinion on the Accordance with International Law of the Unilateral Declaration of Independence in Respect of Kosovo, **the establishment of interim governance through UNMIK (United Nations Interim Administration Mission in Kosovo) was not a form of international territorial administration supplanting sovereignty, but rather a model of shared responsibility between the international community and local actors.**

Under Security Council Resolution 1244 (1999), governance authority was vested in UNMIK, which acted “on behalf of the people of Kosovo” , while simultaneously fostering the development of local institutions, eventually leading to the establishment of the Provisional Institutions of Self-Government (PISG).

This model evidences the possibility of sovereignty being exercised jointly or sequentially during *interregna*, under clear international mandates and in line with the principle of self-determination.

Applied to Iran, such a framework does not imply complete detachment from the international legal order. Rather, it implies a recalibration of the relationship between national sovereignty and international cooperation.

Legal scholarship has increasingly converged on the concept of *ius in interregno*, a legal order specifically governing transitions, under which domestic interim governance (DIG)

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structures can be installed without external trusteeship, but nonetheless compatible with collective security obligations under the UN Charter. The “peace-through-transition” paradigm—now anchored in United Nations Security Council practice—has been applied in post-conflict transitions in Syria, Libya, Yemen, and Guinea-Bissau, where the Security Council has used its Chapter VII powers not to impose foreign rule, but to endorse inclusive, domestically led political transitions with detailed mandates, timelines, and oversight mechanisms.

These governance arrangements, far from usurping authority, aim to restore it.

They should therefore be seen not as limitations on sovereignty but as vehicles for its restoration and consolidation. Sovereignty, in this context, is dynamic: exercised in partnership with institutions such as the Security Council, but grounded in domestic political will. The precedents of Kosovo and Timor-Leste suggest that where the Security Council determines that a threat to international peace and security exists, it may temporarily authorize international support for interim governance mechanisms, provided they aim to foster local ownership, legal accountability, and long-term institutional capacity.

In short, the legal logic of shared authority is not only available—it is precedented.

In Iran’s case, building upon existing national structures—such as a consultative assembly or interim council—with international endorsement under Chapter VI or VII of the UN Charter, could offer a path forward. This would not constitute a foreign intervention but rather a legal, multilateral response to a national transition, in conformity with evolving international legal standards governing *interregna*.

#### EU-supported constitutional forums

The European Union has consistently affirmed that respect for human rights, democracy, and the rule of law must guide its external action, including toward the Islamic Republic of Iran. While not pursuing regime change as a declared policy, the EU has long promoted inclusive constitutional reform and democratic transition through political recognition, technical assistance, and targeted funding. In its resolution of 10 March 2011

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(2011/2096(INI)), the European Parliament condemned the Iranian regime's repressive practices and called for institutional reform consistent with international legal standards. The resolution encouraged support for civil society actors and independent media in exile, while urging the Council to consider restrictive measures against individuals responsible for abuses.

In comparable contexts, the EU has followed a multifaceted model:

- **Belarus:** After the disputed elections in August 2020, the European Parliament passed a resolution recognising opposition leader Sviatlana Tsikhanouskaya and the Coordination Council as the legitimate representatives of the Belarusian people. The EU imposed targeted sanctions under the EU Global Human Rights Sanctions Regime (Council Regulation (EU) 2020/1998), and funded civil society and independent media through the European Instrument for Democracy and Human Rights and the European Endowment for Democracy. These measures were designed not to replace Belarusian institutions but to reinforce actors working for democratic continuity.
- **Ukraine:** The case of Ukraine further illustrates how constitutional transformation can receive external support while remaining nationally led. During the 2013–2014 Euromaidan protests, the EU sent high-level envoys to facilitate a peaceful resolution, and backed subsequent reforms following the fall of President Yanukovich. The signing of the EU–Ukraine Association Agreement in June 2014 marked a turning point: it laid the legal and institutional groundwork for cooperation on justice reform, governance, and fundamental rights. That agreement was reinforced by macro-financial assistance exceeding €3 billion and further conditionality based on transparency and rule-of-law benchmarks.
- **Tunisia:** Following the 2011 revolution, the EU launched the EU–Tunisia Privileged Partnership, which supported electoral processes and constitutional drafting through two consecutive EU–Tunisia Action Plans (2013–2017 and 2018–2020). Assistance included funding for the Independent High Authority for Elections (ISIE), transitional justice bodies, and civil society platforms. The

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European External Action Service (EEAS) worked closely with Tunisian authorities to align reforms with human rights commitments and international best practices. This engagement remains one of the EU's most sustained democratic support efforts in the region.

- **Venezuela:** In 2019, the EU recognised Juan Guaidó as interim president, adopted sanctions under Council Decision (CFSP) 2017/2074, and continued to support democratic institutions and humanitarian operations.
- **Myanmar:** After the February 2021 military coup, the European Parliament called for recognition of the National Unity Government and imposed sanctions through Council Decision (CFSP) 2021/1000. Funding was extended to displaced communities and resistance-linked groups via EU humanitarian channels.

These precedents show that the EU's support for constitutional reform, cautious and legally constrained, can be both strategic and principled. Should a political transition emerge in Iran, the EU is institutionally and normatively equipped to assist a domestic constitutional forum. Such support would not dictate political outcomes but would aim to ensure legality, inclusivity, and compliance with democratic standards.

#### Election monitoring and transitional justice mechanisms

Across transitional settings, international involvement has not aimed to dictate political outcomes, but rather to help secure the legal and institutional conditions necessary for a legitimate and peaceful transition. The European Union, often in coordination with the United Nations, has adapted its support to each context, addressing political risks, institutional weaknesses, and social fragmentation through a combination of electoral assistance, justice reform, and targeted political engagement:

- **Colombia:** following the 2016 peace agreement, EU electoral missions and reintegration support contributed to transforming the FARC from a guerrilla force into a political actor, while reinforcing trust in post-conflict institutions.

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- **South Africa:** South Africa's transition away from apartheid relied in part on European funding for the Truth and Reconciliation Commission and election observation, which lent credibility to a negotiated and non-violent shift in power.
  - **Kosovo:** After the 1999 conflict, the EU assumed core rule-of-law functions through the EU Rule of Law Mission (EULEX), while also supporting local elections in communities where national legitimacy remained disputed.
  - **Tunisia:** After the 2011 revolution, EU support focused on building electoral infrastructure and transitional justice mechanisms—critical tools for bridging ideological and generational divides.
  - **Bosnia and Herzegovina:** Bosnia and Herzegovina continues to rely on EU election support and judicial assistance under the legal framework established by the Dayton Accords, with EUFOR maintaining security guarantees.
  - **Libya:** Although progress remains limited, EU engagement has included technical aid to electoral bodies and dialogue initiatives designed to hold the political space open.
  - **Ukraine:** Since the 2014 revolution, the EU has combined election monitoring, justice reform, and political dialogue to support democratic resilience amid ongoing internal and external pressures.

These interventions point to a common lesson: successful transitions require credible, lawful procedures, not rushed timelines or imposed frameworks. When designed with clarity and broad legitimacy, electoral and justice processes can open the space for political reconstruction.

#### Diaspora coordination for legitimacy and inclusion

Any inclusive transitional framework must recognise the Iranian diaspora—including opposition groups, exiled minorities, and asylum seekers—as a legitimate political stakeholder. Though physically excluded, these communities represent a broad spectrum of political visions, ethnic and religious identities, and democratic aspirations.

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Their systematic exclusion by the regime, including through persecution and extraterritorial surveillance by the Islamic Revolutionary Guard Corps (IRGC), must not be mirrored by international silence.

As outlined in Section 7, the diaspora's role is not ancillary but foundational: it includes long-exiled voices with institutional memory, experience in political transitions, and broad public reach. Many remain under threat even within Europe, yet continue to organise, advocate, and prepare alternatives to the current system. Their exclusion from formal processes would not only undermine the credibility of future institutions—it would contradict the EU's stated external action principles.

The European Union should therefore initiate structured, pluralistic dialogue with diaspora representatives, ensuring participation across ideological, ethnic, and generational lines. Instruments such as the European Instrument for Democracy and Human Rights (EIDHR) can be deployed to support coordination platforms, civic education, and accessible Persian-language media.

Recognition must not wait for regime change. Affirming the political legitimacy of exiled communities now is a necessary step to ensure that future transitions rest on inclusive, lawful, and representative foundations.

## 10. Conclusions and Recommendations

The Islamic Republic of Iran today poses one of the most complex threats to international security—combining domestic authoritarianism, nuclear brinkmanship, regional proxy warfare, and transnational criminal–terrorist networks. Europe can no longer afford to address these challenges in isolation—or to rely on outdated assumptions that engagement will lead to moderation. The time for incrementalism has passed.

This paper has outlined a principled and actionable framework for Europe to respond—anchored in international law, strategic deterrence, and support for democratic transformation. The upcoming expiration of key provisions under UNSC Resolution 2231 is not a procedural milestone—it is a test of Europe's resolve.



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Europe must now adopt a dual-track strategy:

**1. Immediate nuclear containment and counterterrorism enforcement**

- Trigger the snapback mechanism under UNSC 2231 through the UK, France, Germany, or the EU collectively.
- Fully reimpose UN sanctions and coordinate with the United States to restore secondary sanctions.
- Designate the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organisation under EU and UK law.

**2. Structured support for lawful political transition**

- Promote internal self-determination and inclusive governance within Iran's existing borders.
- Support transitional governance models, constitutional reform, and credible election oversight.
- Engage with Iran's civil society and diaspora to build legitimacy and prevent power vacuums.
- Uphold Article 21 of the Treaty on European Union by aligning external action with democracy, human rights, and the rule of law.

Europe has the legal foundation, diplomatic tools, and historical experience to lead. What is now required is sustained political will. A peaceful, rules-based transition in Iran is not idealistic—it is the only viable alternative to permanent crisis.