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Iran: U.S. Economic Sanctions and the Authority to Lift Restrictions

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Summary

U.S. sanctions related to Iran are arguably among the most comprehensive of any such sanctions that the United States unilaterally maintains with respect to a foreign country. The United States has imposed sanctions on thousands of individuals and entities in Iran and in third countries. Such sanctions have contributed to the U.S. government's longstanding efforts to deprive the Iranian government of resources to pursue, and to compel it to abandon, its development of a nuclear program, acts of international terrorism, human rights abuse, weapons and missile development and acquisition, and role in regional instability. Such sanctions target much of Iran's economic activity, including its crude oil exports and banking sector.

As part of the 2015 Joint Comprehensive Plan of Action (JCPOA), the United States lifted many nuclear-related sanctions, including those on exports of Iranian oil to third countries, but maintained most other bilateral sanctions measures; in return, Iran agreed to certain limits on its nuclear activities. President Donald Trump ceased U.S. participation in the JCPOA starting in 2018 by reimposing certain sanctions and sanctioning additional entities under both new and existing authorities. Those authorities were kept in place under the Biden Administration, which sanctioned hundreds of additional persons.

Upon retaking office, President Trump ordered the imposition of "maximum pressure" on the Iranian government. Still, the Trump Administration conducted some diplomatic engagement with Iran in early 2025 until an Israeli attack on Iran initiated a 12-day conflict that culminated with U.S. airstrikes and an uneasy ceasefire.

Another round of U.S.-Iran diplomatic engagement in early 2026 was ended by U.S. and Israeli strikes on Iran that began on February 28, 2026. Those strikes initiated widespread conflict across the region until an April 2026 ceasefire. In a mid-June 2026 memorandum of understanding (MOU), the United States and Iran declared "the immediate and permanent termination of military operations on all fronts" and the United States made certain sanctions-related commitments, including the eventual termination "of all types of sanctions against" Iran as part of a final deal. As of mid-August 2026, the 60-day timeline for a final deal has passed and the MOU is apparently "over," per President Trump, amid renewed fighting between the United States and Iran largely related to the status of the Strait of Hormuz. The status of U.S.-Iran diplomatic engagement, if any, is unclear as of mid-August 2026.

This report identifies the basis in U.S. statutes and executive orders for sanctions imposed on Iran, and the nature of the authority to waive or lift those restrictions. It comprises two tables that present legislation and executive orders that are specific to Iran and its objectionable activities in the areas of terrorism, human rights, and weapons proliferation.

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Post-2018 Developments in U.S. Sanctions on Iran

On May 8, 2018, President Donald Trump announced that the United States was ending its participation in the Joint Comprehensive Plan of Action (JCPOA).[1] The JCPOA is an agreement signed on July 14, 2015, by the United States, Russia, China, France, Britain, Germany (the E3/EU+3), and Iran, to require Iran to limit its nuclear program and, in exchange, require the United States and others to ease economic sanctions affecting Iran (see **text box** below).

Joint Comprehensive Plan of Action, Vienna, July 14, 2015

On July 14, 2015, the E3/EU+3 and Iran reached agreement on a Joint Comprehensive Plan of Action (JCPOA) in which "Iran reaffirms that under no circumstances will Iran ever seek, develop or acquire any nuclear weapons" (JCPOA, *Preface*, p. 1). The agreement also stated: "This JCPOA will produce the comprehensive lifting of all U.N. Security Council sanctions as well as multilateral and national sanctions related to Iran's nuclear programme, including steps on access in areas of trade, technology, finance and energy" (JCPOA, *Preamble and General Provisions*, paras. iii and v).

A 37-point main text and five annexes constitute the JCPOA. Annex II and its multiple attachments that identify "persons, entities and bodies set out in Annex II" define "sanctions-related commitments." Annex V, the "Implementation Plan," establishes the timeline for each party to implement its responsibilities.

The U.S. government summarized the key markers relating to sanctions as follows:

- The UN Security Council resolution endorsing the JCPOA will terminate all the provisions of the previous UN Security Council resolutions on the Iranian nuclear issue simultaneously with the IAEA-verified (International Atomic Energy Agency-verified) implementation of agreed nuclear-related measures by Iran and will establish specific restrictions.
- The EU will terminate all provisions of the EU Regulation, as subsequently amended, implementing all the nuclear related economic and financial sanctions, including related designations, simultaneously with IAEA-verified implementation of agreed nuclear[-]related measures by Iran as specified in Annex V.
- The United States will cease the application, and will continue to do so, in accordance with the JCPOA, of the sanctions specified in Annex II, to take effect simultaneously with the IAEA-verified implementation of the agreed upon related measures by Iran as specified in Appendix V. *(Note: U.S. statutory sanctions focused on Iran's support for terrorism, human rights abuses, and missile activities remain in effect.)* [Italics in original.]
- Eight years after Adoption Day or when the IAEA has reached the Broader Conclusion that all nuclear material in Iran remains in peaceful activities, whichever is earlier, the United States will seek such legislative action as may be appropriate to terminate or modify to effectuate the termination of sanctions specified in Annex II.

Text of the JCPOA is available at https://www.eeas.europa.eu/eeas/nuclear-agreement-%E2%80%93-jcpoa_en. Text of the U.S. Government's "Key Excerpts of the JCPOA" is available at https://obamawhitehouse.archives.gov/the-press-office/2015/07/14/key-excerpts-joint-comprehensive-plan-action-jcpoa.

The President's decision set in motion the restoration of U.S. unilateral economic sanctions that affect U.S. businesses and include secondary sanctions that target commerce originating in other countries that engage in trade with and investment in Iran. The Secretaries of the Treasury and State were required to take appropriate steps to reimpose as quickly as possible, but not later than 180 days (November 4, 2018), the U.S. sanctions that were waived or lifted in implementing the United States' part of the JCPOA.[2]

The Department of the Treasury's Office of Foreign Assets Control (OFAC) issued a new set of *Frequently Asked Questions* shortly after the President's announcement to explain how the United

[1] White House, *NSPM-11—Ceasing U.S. Participation in the JCPOA and Taking Additional Action to Counter Iran's Malign Influence and Deny Iran All Paths to a Nuclear Weapon*, May 8, 2018.

[2] NSPM-11 (May 8, 2018).

States intended to reestablish the sanctions regime.[3] The State Department reported to Congress a set of waiver revocations, determinations, certifications, and findings to establish, in effect, a timeline for the reimposition of sanctions on certain Iranians and those who engage in business with and investment in Iran.[4]

The Trump Administration reestablished the United States' sanctions regime in a wave of announcements, including the following:

- On June 27, 2018, OFAC began a wind-down and eventual prohibition of the importation of Iranian-origin carpets and foodstuffs, and contracts related to Iran's commercial passenger airline services.[5] OFAC also revoked General License H of January 16, 2016, and authorizations that it had issued under the license relating to foreign entities owned or controlled by a U.S. person.[6]
- The President, on August 6, 2018, ordered the blocking of transactions related to the government of Iran's ability to acquire U.S. bank notes or precious metals; material support for Iran's trade in oil, other energy-related resources, shipping, shipbuilding, the automotive sector; port operations; or support for the Central Bank of Iran.[7]
- On November 5, 2018, "the United States fully re-imposed the sanctions on Iran that had been lifted or waived under the JCPOA."[8] This action included the designation of "more than 700 individuals, entities, aircraft, and vessels."[9]

Post-2018 U.S. sanctions measures related to Iran include the following:

- The April 2019 designation of Iran's Islamic Revolutionary Guards Corps (IRGC) as a Foreign Terrorist Organization (FTO).[10]
- E.O. 13871 (May 8, 2019), blocking transactions and trade related to Iran's iron, steel, aluminum, or copper sectors.[11]
- E.O. 13876 (June 24, 2019), blocking assets of and transactions with the Supreme Leader of the Islamic Republic of Iran, the Supreme Leader's Office,

[3] Department of the Treasury, Office of Foreign Assets Control (OFAC), *Frequently Asked Questions Regarding the Re-Imposition of Sanctions Pursuant to the May 8, 2018 National Security Presidential Memorandum Relating to the Joint Comprehensive Plan of Action (JCPOA)*, issued May 8, 2018, and last updated August 6, 2018, https://ofac.treasury.gov/media/16676/download?inline.

[4] Department of State, *Report to Congress: Waiver of Certain Sanctions to Provide for a Wind-Down Period for Sanctions Relief Previously Provided Consistent with the Joint Comprehensive Plan of Action*; and *Waiver Revocations, Determinations, Certifications, and Findings*, May 8, 2018.

[5] 31 C.F.R. Part 560, as amended effective June 27, 2018, 83 *Federal Register* 30335.

[6] OFAC has issued some dozen General Licenses (GL) to allow for limited transactions with Iranian persons and entities ranging across engagement with international organizations, civil aircraft safety, educational services, sports activities, nongovernmental organizations activities in Iran, personal communications, trade in food and medicine, commercial use of the internet, and the transportation of human remains. The licenses were revoked on June 27, 2018.

[7] Executive Order 13846 of August 6, 2018, 83 *Federal Register* 38939; and 31 C.F.R. Part 560, as amended effective November 5, 2018, 83 *Federal Register* 55269.

[8] OFAC, *Re-Imposition of the Sanctions on Iran that Had Been Lifted or Waived under the JCPOA*, November 4, 2018, https://ofac.treasury.gov/sanctions-programs-and-country-information/iran-sanctions/re-imposition-of-the-sanctions-on-iran-that-had-been-lifted-or-waived-under-the-jcpoa.

[9] OFAC, *Re-Imposition of the Sanctions on Iran that Had Been Lifted or Waived under the JCPOA*, November 4, 2018.

[10] Department of State Public Notice 10735, 84 *Federal Register* 15278.

[11] Executive Order 13871 of May 8, 2019, 84 *Federal Register* 20761; 31 C.F.R. Part 561 as amended; and 31 C.F.R. Part 562, as amended.

and any person appointed to a position as a state official of Iran.[12] This measure also authorized the imposition of sanctions on foreign financial institutions (secondary sanctions) found to engage in transactions with or on behalf of any person or entity designated under the June 2019 measure.

- Effective November 14, 2019, the Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) finalized a rule prohibiting U.S. banks from opening or maintaining correspondent accounts for, or on behalf of, Iranian financial institutions to process transactions involving Iranian financial institutions.[13] Iran was initially determined to be a jurisdiction of primary money laundering concern in November 2011, and this rule finalized that determination.[14]

The Biden Administration kept in place all sanctions imposed by the first Trump Administration (i.e., sanctions reimposed to cease participating in the JCPOA, as well as new sanctions issued subsequent to the U.S. JCPOA withdrawal) and designated hundreds of additional Iranian and non-Iranian entities for sanctions for involvement in Iran-related activities.

In total, thousands of individuals and entities have been designated for sanctions for their involvement in Iran-related activities since 2018. Under the second Trump Administration alone, over 1,100 entities in dozens of countries around the world have been designated for Iran-related sanctions. Congress has mandated regular reports from the executive branch on the status of U.S. sanctions on Iran (most recently in Section 7041(b) of the Consolidated Appropriations Act, 2026, P.L. 119-75). For a list of reporting requirements related to Iran, including some related to U.S. sanctions actions, see CRS Report R48282, *Iran: Congressional Reporting Requirements*.

In a mid-June 2026 memorandum of understanding (MOU), the United States and Iran declared "the immediate and permanent termination of military operations on all fronts" and committed to negotiate a final deal within 60 days (extendable by mutual consent).[15] Sanctions-related U.S. commitments in the MOU include

- granting all "required licenses, waivers and permissions needed for the relevant financial transactions" to establish a $300 billion fund "for the reconstruction and economic development of Iran";
- the eventual termination "of all types of sanctions against" Iran as part of a final deal;
- U.S. "waivers for the export of Iranian crude oil, petroleum products and derivatives, and all associated services"; and
- the eventual use of Iranian "frozen or restricted funds or assets … for payment to any ultimate beneficiary designated by the Central Bank of Iran."[16]

[12] Executive Order 13876 of June 24, 2019, 84 *Federal Register* 30573.

[13] Department of the Treasury, Financial Crimes Enforcement Network, 31 C.F. R. Part 1010, *Imposition of Fifth Special Measure Against the Islamic Republic of Iran as a Jurisdiction of Primary Money Laundering Concern*, 84 *Federal Register* 59302, November 14, 2019.

[14] For the initial determination of November 28, 2011, see 76 *Federal Register* 72878.

[15] *Islamabad Memorandum of Understanding Between the Islamic Republic of Iran and the United States of America*, June 2026, https://www.politico.com/f/?id=0000019e-db5d-d1ed-a59f-ff5da65a0000.

[16] *Islamabad Memorandum of Understanding*.

In furtherance of the MOU's implementation, OFAC issued General License X on June 22, 2026, temporarily authorizing the production, delivery, and sale of Iranian-origin crude oil, petrochemical products, and petroleum products through August 21, 2026.[17]

Congressional Review and the Iran Nuclear Agreement Review Act

Under the 2015 Iran Nuclear Agreement Review Act (INARA, P.L. 114-17), the President is required to submit to Congress "an agreement with Iran relating to the nuclear program of Iran" within five days of reaching such agreement, along with a certification "describing any sanctions to be waived, suspended, or otherwise reduced." The President's submission of the agreement triggers a 30-day congressional review period. INARA stipulates that "the President may not waive, suspend, reduce, provide relief from, or otherwise limit the application of statuary sanctions with respect to Iran" during that review period, as well as "prior to and during the [five-day] period for transmission." Vice President JD Vance said on June 18 that "we don't think" the deal requires congressional approval, that "we actually have an opinion from OLC [the Department of Justice's Office of Legal Counsel]" to that effect, and that "we feel quite confident that we can temporarily lift those sanctions without going to Congress."[18] Some Members of Congress criticized the Trump Administration for not submitting the MOU to Congress under INARA.[19]

In late June 2026, Iran restarted firing on vessels in the Strait of Hormuz amid disputes on other MOU components, such as the provision related to frozen Iranian assets.[20] As conflict widened the following month, OFAC issued General License X-1 on July 7 revoking General License X. Asked the following day, "Is the MoU dead?," President Trump said, "As far I'm concerned, it's over" and "it's a waste of time dealing with" the Iranian government.[21] The Trump Administration also, starting July 10, announced several rounds of Iran-related sanctions designations. The status of U.S.-Iran diplomatic engagement, if any, is unclear as of mid-August 2026, with the 60-day MOU deadline for a "final deal" having passed.

Authority to Waive or Lift Economic Sanctions

The ability to impose or ease economic sanctions with some nimbleness and responsiveness to changing events is arguably key to effective use of the tool in furtherance of national security or foreign policy objectives. Historically, both the President and Congress have prioritized such responsiveness, resulting in statutory sanctions authorities that provide the President substantial flexibility through the invocation of statutory waivers and/or regulatory licensing actions. In the collection of laws that are the statutory basis for the U.S. economic sanctions regime on Iran, the President largely retains, in varying degrees, the authority to tighten or relax restrictions.[22]

The President has the authority to impose a wide range of economic sanctions under the National Emergencies Act (NEA) and the International Emergency Economic Powers Act (IEEPA)—the

[17] OFAC, *General License X, Authorizing the Production, Delivery and Sale of Crude Oil, Petrochemical Products, and Petroleum Products of Iranian-Origin through August 21, 2026*, June 22, 2026.

[18] "JD Vance: White House press briefing on U.S.-Iran peace plan," *American Rhetoric*, June 18, 2026.

[19] See, for example, House Armed Services Committee, "Meeks, Smith, Himes demand Trump Admin briefing on US-Iran Memorandum of Understanding," June 17, 2026, https://democrats-armedservices.house.gov/ranking-member.

[20] Kian Sharifi, "Iran pushes back against Trump's claims about frozen assets amid anger from hard-liners," RFE/RL, June 24, 2026.

[21] "Trump says MOU with Iran is 'over' and it's a waste of time dealing with Tehran," Al Jazeera English, July 8, 2026.

[22] See the **text box** "Congressional Review and the Iran Nuclear Agreement Review Act" for circumstances in which INARA could affect the President's authority to provide sanctions relief.

authority on which sanctions-initiating executive orders are often based.[23] Using these statutes, President William Clinton found on March 15, 1995, that "the actions and policies of the Government of Iran constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States."[24] President Clinton further declared a national emergency to deal with this threat; this declaration has been renewed annually since 1995, as required by statute, and is the basis for subsequent executive orders that have expanded restrictions on economic relations with Iran.[25] President Trump cited the 1995 national emergency as the legal basis when he signed Executive Order 13846 of August 6, 2018, to reimpose sanctions after ending U.S. participation in the JCPOA.[26]

Congress has largely granted the President flexibility to waive implementation of statutory sanctions on U.S. national security or national interest grounds. Congress has also granted to the President the authority to terminate some statutory sanctions imposed on Iran. Before terminating such sanctions, however, the President may be required to certify that the government of Iran has ceased its engagement in certain activities, including, for example, support for acts of international terrorism and acquisition and development of nuclear, biological, and chemical weapons and ballistic missiles. Section 401 of the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA), as amended, states—

> SEC. 401 [22 U.S.C. 8551]. GENERAL PROVISIONS.
>
> (a) SUNSET.—The provisions of this Act (other than sections 105 and 305 and the amendments made by sections 102, 107, 109, and 205) shall terminate, and section 13(c)(1)(B) of the Investment Company Act of 1940, as added by section 203(a), shall cease to be effective, on the date that is 30 days after the date on which the President certifies to Congress that—
>
> (1) the Government of Iran has ceased providing support for acts of international terrorism and no longer satisfies the requirements for designation as a state sponsor of terrorism (as defined in section 301) under—
>
> (A) section 6(j)(1)(A) of the Export Administration Act of 1979 (50 U.S.C. App. 2405(j)(1)(A)) (or any successor thereto);
>
> (B) section 40(d) of the Arms Export Control Act (22 U.S.C. 2780(d)); or
>
> (C) section 620A(a) of the Foreign Assistance Act of 1961 (22 U.S.C. 2371(a)); and
>
> (2) Iran has ceased the pursuit, acquisition, and development of, and verifiably dismantled its, nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology.
>
> (b) PRESIDENTIAL WAIVERS.—
>
> (1) IN GENERAL.—The President may waive the application of sanctions under section 103(b), the requirement to impose or maintain sanctions with respect to a person under section 105(a), 105A(a), 105B(a), or 105C(a), the requirement to include

[23] National Emergencies Act, P.L. 94-412; 50 U.S.C. 1601 et seq.; and International Emergency Economic Powers Act (IEEPA), P.L. 95-223; 50 U.S.C. 1701 et seq.

[24] Executive Order 12957 of March 15, 1995, 60 *Federal Register* 14615.

[25] 60 *Federal Register* 14615. For the most recent continuation of the national emergency with respect to Iran first declared in Executive Order 12957, see Notice of March 2, 2026, 91 *Federal Register* 10937. An earlier order, relating to the taking of hostages at the American Embassy in Tehran in 1979, also remains active and is based on a separate announcement that a national emergency exists. See Executive Order 12170 of November 14, 1979, 44 *Federal Register* 65729.

[26] Executive Order 13846 of August 6, 2018; 83 *Federal Register* 38939.

> a person on the list required by section 105(b), 105A(b), 105B(b), or 105C(b), the application of the prohibition under section 106(a), or the imposition of the licensing requirement under section 303(c) with respect to a country designated as a Destination of Diversion Concern under section 303(a), if the President determines that such a waiver is in the national interest of the United States.[27]

Congress included substantially similar termination provisions in the Stop Harboring Iranian Petroleum Act (SHIP Act, Division J of P.L. 118-50) and Fight and the Combat Rampant Iranian Missile Exports Act (Fight CRIME Act, Division K of P.L. 118-50). The Iran Sanctions Act of 1996, as amended, also provides for the termination of some sanctions if similar terrorism- and weapons-related conditions are met; in addition, it requires the President to certify that Iran "poses no significant threat to United States national security, interests, or allies."[28] Meeting all of these conditions would authorize the President to terminate some provisions in the Iran Sanctions Act of 1996 before the act sunsets on December 31, 2026.[29] Before terminating certain human rights-related, statutorily mandated sanctions on Iran, the President must certify that the government of Iran is no longer engaging in human rights violations.[30]

International Terrorism Determination

As mentioned above, to lift the majority of economic sanctions imposed by CISADA, the President must determine and certify that the government of Iran no longer supports acts of international terrorism. The government of Iran is designated as a state sponsor of acts of international terrorism, effective January 1984, pursuant to the Secretary of State's authorities and responsibilities under Section 6(j) of the Export Administration Act of 1979.[31] Various statutes impede or prohibit foreign aid, financing, and trade because of that designation. Three laws (§620A, Foreign Assistance Act of 1961 [22 U.S.C. 2371]; §40, Arms Export Control Act [22

[27] Sanctions provisions in Section 1245 of the National Defense Authorization Act for Fiscal Year 2012 (22 U.S.C. 8513a) and most of the sanctions provisions in the Iran Threat Reduction and Syria Human Rights Act of 2012 (22 U.S.C. 8701 et seq.) terminate 30 days after the President submits to Congress the certification described in Section 401(a) of the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (22 U.S.C. 8551(a)).

[28] 50 U.S.C. 1701 note. The termination provision in Section 8 of the Iran Sanctions Act of 1996 also applies to certain sanctions provisions in the Iran Threat Reduction and Syria Human Rights Act of 2012 (22 U.S.C. 8701 et seq.) and the Iran Freedom and Counter-Proliferation Act of 2012 (22 U.S.C. 8801 et seq.).

[29] Other Iran-related sanctions provisions with sunset dates include the Fight and Combat Rampant Iranian Missile Exports Act Fight CRIME Act; Div. K of P.L. 118-50), which sunsets four years after enactment (§6); No Technology for Terror Act (Div. N of P.L. 118-50), which sunsets seven years after enactment (§2); and Holding Iranian Leaders Accountable Act of 2024 (Div. R of P.L. 118-50), which sunsets five years after enactment (§6) or sooner, if the Secretary of the Treasury reports to appropriate Members of Congress that "(A) Iran is not a jurisdiction of primary money laundering concern; or (B) the Government of Iran is providing significant cooperation to the United States for the purpose of preventing acts of international terrorism, or for the promotion of any other strategic objective that is important to the national interest of the United States, as specified in the report by the Secretary."

[30] See Section 105(d) of CISADA (22 U.S.C. 8514(d)) and Section 1248 of the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA; 22 U.S.C. 8807), which refers to Section 105(d) of CISADA. Sanctions under Section 105 of CISADA are also referenced in the Mahsa Amini Human rights and Security Accountability Act (MAHSA Act; Div. L of P.L. 118-50).

[31] The Export Controls Act of 2018 (ECA'18; part I, subtitle B, title XVII of P.L. 115-232, the John S. McCain National Defense Authorization Act for Fiscal Year 2019) repealed all but three sections of the Export Administration Act of 1979 (EAA'79), including Section 6(j) relating to designating a foreign government as a sponsor of acts of international terrorism. Section 1768, ECA'18 (50 U.S.C. 4826) continued under Section 1754(c), ECA'18, any designation or related determination, delegation, rule, regulation, license, or order made under Section 6(j), EAA'79. In addition, Section 1768, ECA'18, provides that any reference elsewhere in law to Section 6(j), EAA'79, shall be deemed to be a reference to Section 1754(c), ECA'18.

U.S.C. 2780]; and §754(c), Export Controls Act of 2018 [50 U.S.C. 4813(c)]) form the "terrorist list."[32] Because these statutes are not Iran-specific, they are not included in **Table 1**.

The President has the authority to remove the designation of any country from the terrorist list. Though each of the three laws provides slightly different procedures, the authority to delist Iran resides with the President and generally requires him to find that

- there has been a fundamental change in the leadership and policies of the government,
- the government is not supporting acts of international terrorism, and
- the government has provided assurances that it will not support terrorism in the future.

Alternatively, the President may notify Congress that the terrorism designation will be rescinded in 45 days, and that the rescission is justified on the basis that

- the government has not supported an act of terrorism in the preceding six months and
- the government has provided assurances that it will not support terrorism in the future.

In the case of foreign aid, the President also is authorized to provide aid despite the terrorism designation if he finds that "national security interests or humanitarian reasons justify" doing so and so notifies Congress 15 days in advance.[33]

Iran's Frozen Assets

The question of Iran's access to funds abroad has received particular attention since 2011, when Congress passed legislation to sanction foreign financial institutions that engage in transactions with the Central Bank of Iran (CBI) or other designated Iranian financial institutions, with an exception for the financial institutions of countries determined to be significantly reducing their imports of Iranian petroleum (the significant reduction exception, or SRE).[34]

The next year, Congress expanded the restriction by requiring excepted foreign buyers to deposit payments for petroleum imports in financial institutions located in the purchasing country, rather than remitting such funds to Iran, to avoid sanctions.[35] That legislation effectively blocked Iranian funds abroad, since third-country financial institutions proved unwilling to transact with Iranian counterparts and funds accrued in accounts outside of Iran. The status and use of those funds abroad have become the subject of considerable speculation. Some observers describe these assets as blocked by the United States. Their availability to Iran is restricted by foreign financial institutions seeking to comply with the U.S. Iran sanctions program and avoid becoming potential targets for U.S. secondary sanctions.

[32] Section 40A, Arms Export Control Act (22 U.S.C. 2780), also prohibits trade in defense articles and defense services to any country the President finds "is not cooperating fully with United States antiterrorism efforts." The President may waive the prohibition if he finds it "important to the national interests" to do so. This provision requires the President to annually identify uncooperative states. Iran has been listed since the provision's enactment in 1996 (first list was issued in 1997; authority to make certifications is currently delegated to the Secretary of State). On May 7, 2026, the Secretary of State issued the latest list, which continues to designate Iran. See Department of State Public Notice 13020, 91 *Federal Register* 13020.

[33] 22 U.S.C. 2371(d).

[34] 125 Stat. 1298, 22 U.S.C. 8513a.

[35] 126 Stat. 162, 22 U.S.C. 8801 note.

In accordance with statute, the U.S. government has permitted the use of blocked funds for humanitarian trade.[36] According to U.S. Department of the Treasury guidance issued in 2013, in order for depository institutions to avoid sanctions, the restricted funds they hold must only (1) be used to directly pay for Iranian purchases of goods and services from the third country or (2) be deposited in "special purpose accounts," "set up with conditions and safeguards that require the account be used only for bilateral trade in goods or services between Iran and the country with primary jurisdiction over the [foreign financial institution], and for sales made under the Humanitarian Exception."[37] Those conditions align with and reiterate stated provisions in U.S. law that exempt humanitarian trade (namely, agricultural commodities, medicine, and medical devices) from U.S. sanctions programs.[38] Treasury further has specified that in order to avoid U.S. sanctions, the recipient of any funds from Iranian oil sales has to be an individual or entity of the country where the funds are deposited.[39]

In reimposing sanctions on Iran in 2018, the Trump Administration issued a final six-month SRE determination in November 2018 so that eight countries could continue importing Iranian petroleum without risk of U.S. sanctions. The State Department announced in April 2019 that the United States would not issue further SREs.[40] None have, as of July 2026, been issued since; the vast majority of Iranian petroleum exports have gone to China.[41]

In September 2023, in conjunction with mutual prisoner releases from the United States and Iran, the United States approved the transfer of $6 billion in Iranian assets, accrued from Iran's petroleum sales to South Korea, to Qatar.[42] That action, which came less than a month before the October 7, 2023, Hamas-led attacks on Israel and ensuing regional conflict, prompted considerable congressional attention and action. Then-U.S. Treasury Under Secretary for Terrorism and Financial Intelligence Brian Nelson wrote on X (formerly Twitter) on October 7, 2023, "All of the money held in restricted accounts in Doha as part of the arrangement to secure the release of 5 Americans in September remains in Doha. Not a penny has been spent."[43] An October 12, 2023, press report said that then-Deputy Treasury Secretary Wally Adeyemo told legislators that, in the wake of Hamas's assault on Israel, U.S. and Qatari officials had agreed to prevent the use of the funds to finance the purchase of humanitarian goods for export to Iran for an unspecified period of time.[44] As of 2026, those funds appear to remain in Qatari banks.

There has been media reporting on the potential amounts and locations of Iranian funds abroad (including the $6 billion transferred to Qatar in 2023), but there does not appear to be a

[36] 22 U.S.C. 8513a(d)(2), 8806(c), and 7205.

[37] Iran Sanctions FAQs 259 and 260; all Iran sanctions FAQs available at https://ofac.treasury.gov/faqs/topic/1551.

[38] See 22 U.S.C. 7202; IFCA; and FY2012 NDAA.

[39] Iran Sanctions FAQ 263.

[40] For determination, see Department of State Public Notice 10632, 83 *Federal Register* 66832; Department of State, "Decision on Imports of Iranian Oil," April 22, 2019. The November 2018 SRE determination was for China, Greece, India, Italy, Japan, South Korea, Taiwan, and Turkey.

[41] CRS In Focus IF12952, *Iran's Petroleum Exports to China and U.S. Sanctions*.

[42] According to a State Department spokesperson, the transfer was necessary because "a number of banks, despite the assurances we had given … did not want to participate in transactions related to these accounts." Department of State, Press Briefing, September 12, 2023.

[43] X, Under Secretary Brian Nelson (@UnderSecTFI), October 7, 2023, https://twitter.com/UnderSecTFI/status/1710706779980464482?s=20.

[44] Jeff Stein and Jacob Bogage, "U.S., Qatar Agree to Stop Iran from Tapping $6 Billion Fund after Hamas Attack," *Washington Post*, October 12, 2023.

comprehensive, authoritative public list of such funds.[45] The House, in the 118th Congress, passed a measure (H.R. 5826) that would have required annual reports with an "itemized list of any identifiable assets … belonging to Iranian individuals and entities that are or have been blocked or otherwise frozen pursuant to any sanctions program." (Other bills in the House and Senate would have required a similar report.) H.R. 5826 was not taken up by the Senate; the bill was reintroduced in the 119th Congress (H.R. 2619) and ordered to be reported by the House Foreign Affairs Committee in April 2025.

As mentioned above, the United States committed in the June 2026 MOU to undertake "to make fully available for use, the frozen or restricted funds and assets" of Iran "upon implementation of this MoU"; the MOU further specified that such funds "shall be made fully usable for payment to any ultimate beneficiary designated by the Central Bank of the Islamic Republic of Iran."[46] No such funds were evidently made available in the weeks after the MOU's signing: U.S. officials asserted that the United States would have control over Iran's use of the funds, claims rejected by Iranian authorities.[47] On July 23, President Trump wrote on social media that "any and all damages done to Ships, Cargo, or anything related thereto, will be paid for by Iranian Money that the United States has in its possession, and controls."[48]

Legislation and Executive Orders

The two tables presented in this report identify the legislative bases for sanctions imposed on Iran and the nature of the authority to waive or lift those restrictions. **Table 1** presents legislation, and **Table 2** shows executive orders that are specific to Iran and its objectionable activities in the areas of terrorism, human rights, and weapons proliferation.

Public laws that are not specific to the objectionable activities of the government of Iran but have been invoked to impede transactions or other economic or diplomatic relations are not included in **Table 1**. Failure to achieve human rights standards as a condition for foreign aid (e.g., the Foreign Assistance Act of 1961, International Religious Freedom Act of 1998, Trafficking Victims Protection Act of 2000, and related annual appropriations), or refusal to comply with international nonproliferation norms (e.g., Chemical and Biological Weapons Control and Warfare Elimination Act of 1991), for example, can trigger a range of economic sanctions. These and other authorities have been applied to Iran. It seems unlikely that these statutes would be amended if and when they no longer apply to Iran. Sanctions authorized by these statutes are applied, and lifted, by executive branch decision.

On the other hand, because the President holds sole authority to renew, alter, and revoke executive orders he issues pursuant to the National Emergencies Act (NEA) and the International Emergency Economic Powers Act (IEEPA), **Table 2** includes actions taken that are specific to Iran and also actions taken that are not specific to Iran (e.g., Executive Orders 13224 and 13382 target terrorists and proliferators, respectively) but have been applied to that country. The authorities in these orders have been exercised to affect Iran in a significant way. Executive orders are subject to their underlying statutory authorities: economic sanctions are most often based on the President's authorities established in IEEPA. These sanctions are applied and lifted

[45] See, for example, Priyanka Shankar, "What are Iran's $100bn in frozen assets and where are they held?," *Al Jazeera*, April 18, 2026.

[46] *Islamabad Memorandum of Understanding*.

[47] "Iran pushes back against Trump's claims about frozen assets amid anger from hard-liners"; Luke Fountain, "U.S. Treasury will oversee frozen Iranian funds when they're released, Bessent says," CNBC, June 24, 2026.

[48] Post available at https://truthsocial.com/@realDonaldTrump/posts/116971555718513784.

by the President; often their implementation and administration are delegated to the Secretary of the Treasury, who in turn assigns the task to Treasury's Office of Foreign Assets Control. Many of the Iran-specific sanctions in statute cite the President's authority to curtail transactions under IEEPA. In some instances, Congress has enacted restrictions on the President's unilateral authority to revoke an order, and the economic restrictions therein, until specific conditions are met.

Table 1. Iran: Economic Sanctions Currently Imposed in Furtherance of U.S. Foreign Policy or National Security Objectives

(generally in order of enactment)

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
FOREIGN AID: AUTHORIZATION AND APPROPRIATIONS			
Sec. 307, **Foreign Assistance Act of 1961** (P.L. 87-195, as amended; 22 U.S.C. 2227)	General foreign policy reasons	Limits proportionate share of foreign aid to international organizations that, in turn, expend funds in Iran; certain exceptions may apply (including with respect to the International Atomic Energy Agency [IAEA]; see Sec. 307(d) regarding applicability to IAEA programs and projects in Iran).	N/A
Sec. 7007, **National Security, Department of State, and Related Programs Appropriations Act, 2026** (Div. F, P.L. 119-75)	General foreign policy reasons	Prohibits direct funding to the government of Iran, including Export-Import Bank funds.	N/A. Certain "notwithstanding" clauses elsewhere in appropriations and authorization statutes may apply. Limited to appropriations in this act.
Sec. 7041(b), **National Security, Department of State, and Related Programs Appropriations Act, 2026** (Div. F, P.L. 119-75)	General foreign policy reasons	Prohibits appropriated funds from being used to implement an agreement with Iran in contravention to the Iran Nuclear Agreement Review Act of 2015, made available to persons subject to UN or U.S. sanctions with respect to Iran, or used to revoke the designation of the Islamic Revolutionary Guard Corps (IRGC) as a Foreign Terrorist Organization.	N/A. Certain "notwithstanding" clauses elsewhere in appropriations and authorization statutes may apply. Limited to appropriations in this act.
IRAQ SANCTIONS ACT OF 1990			
P.L. 101-513; 50 U.S.C. 1701 note. Extended to apply to Iran by Sec. 1603 of the Iran-Iraq Arms Non-Proliferation Act of 1992.			
Sec. 586G (50 U.S.C. 1701 note)	Non-proliferation	Prohibits sales under the Arms Export Control Act (foreign military sales); export licenses for commercial arms sales for any U.S. Munitions List (USML) item; export of Commerce Control List (CCL) items; and export of nuclear	The President may waive the requirement to impose a sanction if "essential to the national interest"; advanced notification required (Sec. 1606, IIANA).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		equipment, materials, or technology (Sec. 1603, IIANA).	
IRAN-IRAQ ARMS NON-PROLIFERATION ACT OF 1992 (IIANA)			
Title XVI of P.L. 102-484 (National Defense Authorization Act for Fiscal Year 1993), as amended; 50 U.S.C. 1701 note			
Sec. 1603 (50 U.S.C. 1701 note)	Non-proliferation	See entry for Sec. 586G of the Iraq Sanctions Act of 1990, above.	See entry for Sec. 586G of the Iraq Sanctions Act of 1990, above.
Sec. 1604 (50 U.S.C. 1701 note)	Non-proliferation	For a period of two years, for any person who "transfers or retransfers goods or technology so as to contribute knowingly and materially" to Iran's efforts "to acquire chemical, biological, or nuclear weapons or to acquire destabilizing numbers and types of advanced conventional weapons," the U.S. government is to prohibit the procurement of goods or services from a sanctioned person and the issuance of licenses for exports by or to a sanctioned person.	The President may waive the requirement to impose a sanction if "essential to the national interest"; advanced notification required (Sec. 1606, IIANA).
Sec. 1605 (50 U.S.C. 1701 note)	Non-proliferation	For a period of one year, any foreign government that the President determines "transfers or retransfers goods or technology so as to contribute knowingly and materially" to Iran's efforts "to acquire chemical, biological, or nuclear weapons or to acquire destabilizing numbers and types of advanced conventional weapons," the U.S. government is to suspend foreign aid; require U.S. opposition and "no" votes in international financial institutions; suspend weapons co-development and co-production agreements; suspend exchange agreements and related exports pertaining to military and dual-use technology (unless such activities contribute to U.S. security); and prohibit the export of USML items. Authorizes the President to exercise authorities in the International Emergency Economic Powers Act (IEEPA), except with respect to urgent humanitarian assistance (Sec. 1605(c)).	The President may waive the requirement to impose "mandatory" sanctions if "essential to the national interest"; advanced notification required (Sec. 1606, IIANA).
IRAN SANCTIONS ACT OF 1996 (ISA 1996)			
P.L. 104-172, as amended; 50 U.S.C. 1701 note. Act sunsets effective December 31, 2026.			

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
Sec. 5(a), (5(c), Sec. 6 (50 U.S.C. 1701 note)	Non-proliferation; anti-terrorism	Sec. 5(a) requires, with certain exceptions (see Sec. 5(f)) and exclusions (see Sec. 12), the President to impose five or more of the sanctions described in Sec. 6(a) if the President determines, following an investigation (see Sec. 4(e)), that a person knowingly makes certain investments in Iran's petroleum resources; provides certain goods, services, technology, information, or support to Iran relating to the production of refined petroleum products; engages in certain trades in, facilitation of, or financing of Iran's refined petroleum products (with an exception for underwriters and insurance providers that exercise due diligence); participates in certain joint ventures with or benefitting the government of Iran with respect to the development of petroleum resources; supports certain development of Iran's petroleum resources and refined petroleum products; supports certain development of Iran's petrochemical product production; owns, operates, controls, or insures a vessel known to be engaged in the transportation of crude oil from Iran (only if a determination under Sec. 1245(d)(4)(B) of the National Defense Authorization Act for Fiscal Year 2012 (FY2012 NDAA) has been made and unless an exception under Sec. 1245(d)(4)(D) of the FY2012 NDAA has been invoked; an exception for underwriters and insurance providers that exercise due diligence also applies); and concealing Iranian origin of crude oil or refined petroleum products in the course of transporting such products (an exception for underwriters and insurance providers that exercise due diligence also applies). The President may choose from a menu of sanctions options listed in Sec. 6(a), including denying Export-Import Bank program funds; denying export licenses; prohibiting loans from U.S. financial institutions; prohibiting a targeted financial institution from being	The President may waive, on a case-by-case basis, in six-month increments, the application of sanctions under Sec. 5(a) to a foreign national if "vital to the national security interests of the United States"; advanced notification required (Sec. 4(c)). The President may waive, on a case-by-case basis, in twelve-month increments, the application of sanctions under Sec. 5(a) to a targeted person if "vital to the national security interests of the United States" and that person is subject to a government cooperating with the United States in multilateral non-proliferation efforts relating to Iran; advanced notification required (Sec. 4(c)). The President may waive, on a case-by-case basis, the contractor certification requirement in Sec. 6(b) if the President determines and certifies that "it is essential to the national security interests of the United States to do so" (Sec. 6(b)(5)). The requirement to impose sanctions under Sec. 5(a) ceases to have force or effect with respect to Iran if the President determines and certifies that Iran has ceased programs relating to nuclear weapons, chemical and biological weapons, and ballistic missiles; is no longer designated as a state supporter of acts of international terrorism; and "poses no significant threat to United States national security, interests, or allies" (Sec. 8). The President is authorized to delay the imposition of sanctions in order to initiate consultations with a foreign government of jurisdiction over a sanctionable person (Sec. 9(a)). The President may delay the imposition of sanctions relating to the production and export of refined petroleum products in six-month increments if the President certifies that objectionable activities are being curtailed (CISADA, Sec. 102(h)). Sanctions imposed under Sec. 5 are to remain in effect for "not less than 2 years" or for at least one year, after which the President may determine and certify to Congress that the targeted person is "no longer engaging in" the activities that were the basis

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		designated as a primary dealer or a repository of U.S. government funds; denying U.S. government procurement contracts; limiting or prohibiting certain foreign exchange transactions; limiting or prohibiting transactions with certain banks; prohibiting transactions related to certain property; prohibiting investments in equity or debt of a targeted person; denying visas to, or excluding from the United States, corporate officers or shareholders with a controlling interest in a targeted entity; imposing any of the above on a targeted entity's principal executive officers; and imposing IEEPA-based sanctions. With respect to sanctionable activity involving the concealment of Iranian origin of crude oil or refined petroleum products in the course of transporting such products, the President may also prohibit a targeted vessel from landing at a U.S. port for up to two years (Sec. 5(a)(8)(b)). The President may invoke a special rule to avoid initiating an investigation (precursor to imposing sanctions) or to terminate an investigation if the President certifies that the person whose activity was the basis for the investigation is "no longer engaging in the activity or has taken significant verifiable steps toward stopping the activity" and "the President has received reliable assurances that the person will not knowingly engage in" such activity in the future (Sec. 4(e)). Sanctions are also to be imposed on any person the President determines is a successor entity or owned or controlled by a person sanctioned under Sec. 5(a) (Sec. 5(c)). All U.S. government agencies are required to certify any prospective contractor as subject to sanctions under this section and not knowingly engaging in significant transactions with the IRGC (Sec. 6(b)).	for the imposition of sanctions and "the President has received reliable assurances that such person will not knowingly engage in such activities in the future" (Sec. 9(b)). The President may waive on a case-by-case basis and for a period of not more than one year the requirement in Sec. 5(a) to impose sanctions on a person described in Sec. 5(c); advanced notification required (Sec. 9(c)). The act ceases to be effective on December 31, 2026 (Sec. 13).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
Sec. 5(b), 5(c), Sec. 6 (50 U.S.C. 1701 note)	Non-proliferation; anti-terrorism	Sec. 5(b)(1) requires, with certain exceptions (see Sec. 5(f)) and exclusions (see Sec. 12), the President to impose five or more of the sanctions described in Sec. 6(a) (listed above) if the President determines that a person exports, transfers, or otherwise facilitates the transshipment of military/weapons goods, services, or technology, knowing that such actions would result in their provision to Iran and would contribute materially to the Iran's ability to "acquire or develop chemical, biological, or nuclear weapons or related technologies" or "destabilizing numbers and types of advanced conventional weapons." Sec. 5(b)(2) requires, with certain exceptions (see Sec. 5(b)(2)(B) and Sec. 5(f)) and exclusions (see Sec. 12), the President to impose five or more of the sanctions described in Sec. 6(a) (listed above) if the President determines that a person knowingly participated in certain joint ventures that involve activity relating to the mining, production, or transportation of uranium with and benefitting Iran. Sec. 5(b)(3) prohibits, with certain exceptions (see Sec. 5(b)(3)(B) and Sec. 5(b)(3)(C)) and exclusions (see Sec. 12), export licenses and transfer approvals to countries, whose governments have jurisdiction over persons sanctioned under Sec. 5(b)(1) or Sec. 5(b)(2), of any nuclear material, facilities, components, or other goods, services, or technology that are or would be subject to an agreement for cooperation between the United States and that government. Sanctions are also to be imposed on any person the President determines is a successor entity or owned or controlled by a person sanctioned under paras. (1) or (2) of Sec. 5(b) (Sec. 5(c)). All U.S. government agencies are required to certify any prospective contractor as subject to sanctions under this section and does not	The President may approve, on a case-by-case basis, the issuance of export licenses and transfer approvals to a non-sanctioned person in a country to which Sec. 5(b)(3) applies if the President determines that such approval is "vital to the national security interests of the United States"; advanced notification required (Sec. 5(b)(3)(C)). The President may waive, on a case-by-case basis, the contractor certification requirement in Sec. 6(b) if the President determines and certifies that "it is essential to the national security interests of the United States to do so" (Sec. 6(b)(5)). President is authorized delay the imposition of sanctions in order to initiate consultations with a foreign government of jurisdiction over a sanctionable person (Sec. 9(a)). Sanctions imposed under Sec. 5 are to remain in effect for "not less than 2 years" or for at least one year, after which the President may determine and certify to Congress that the targeted person is "no longer engaging in" the activities that were the basis for the imposition of sanctions and "the President has received reliable assurances that such person will not knowingly engage in such activities in the future" (Sec. 9(b)). The President may waive on a case-by-case basis and for a period of not more than one year the requirement in Sec. 5(b) to impose sanctions on a person described in Sec. 5(c); advanced notification required (Sec. 9(c)). The act ceases to be effective on December 31, 2026 (Sec. 13).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		knowingly engage in significant transactions with the IRGC (Sec. 6(b)).	
IRAN, NORTH KOREA, AND SYRIA NONPROLIFERATION ACT (INKSNA)			
P.L. 106-178, as amended; 50 U.S.C. 1701 note			
Sec. 3 (50 U.S.C. 1701 note)	Non-proliferation	Authorizes the President to impose certain sanctions with respect to foreign persons the President has identified as having transferred to or acquired from Iran certain goods, services, or technology related to weapons or missile proliferation, including any or all of the following: prohibitions in Sec. 4(b) (procurement ban) and Sec. 4(c) (assistance ban) of E.O. 12938; prohibitions on USML item sales; denials of export licenses for dual use items. The President may determine that certain foreign persons are exempt from sanctions under certain circumstances if the President reports such a determination to specified committees; advanced notification required (Sec. 5).	The President may choose not to exercise the authority to impose any or all of the sanctions described in Sec. 3 but must notify and justify the decision to specified committees within a specific time frame (Sec. 4).
TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT ACT OF 2000 (TSRA)			
Title IX of P.L. 106-387 (Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2001), as amended; 22 U.S.C. 7201 et seq.			
Sec. 906 (22 U.S.C. 7205)	Anti-terrorism	Requires export licenses for agricultural commodities, medicines, or medical devices to any government designated as a state sponsor of terrorism; prohibits licenses for exports to any entity within such country promoting international terrorism. Exception provided for in Sec. 906(a)(2) does not apply to Iran.	Issuance of each export license is limited to a 12-month duration (subsequent 12-month duration licenses may also be issued).
Sec. 908 (22 U.S.C. 7207)	Anti-terrorism	Prohibits U.S. foreign assistance, U.S. export assistance, and U.S. credits or guarantees from being made available for commercial exports to Iran.	The President may waive the application of prohibitions with respect to Iran if "it is in the national security interest of the United States to do so, or for humanitarian reasons."
IRAN NUCLEAR PROLIFERATION PREVENTION ACT OF 2002 (INPPA)			
Subtitle D, title XIII of P.L. 107-228 (Foreign Relations Authorization Act, Fiscal Year 2003)			
Sec. 1343(b) (22 U.S.C. 2027(b))	Non-proliferation	Requires the U.S. representative to the IAEA to oppose programs determined by the Secretary "to be inconsistent with nuclear nonproliferation and safety goals of the United States."	N/A

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
IRAN FREEDOM SUPPORT ACT (IFSA)			
P.L. 109-293; 50 U.S.C. 1701 note			
Sec. 101 (50 U.S.C. 1701 note)	Democracy promotion; general foreign policy reasons	Requires certain sanctions imposed on Iran in IEEPA-based E.O. 12957, E.O. 12959, and E.O. 13059, as in effect on January 1, 2006, to remain in effect, including prohibitions on entering into a contract or financing or guaranteeing performance under a contract relating to petroleum resource development in Iran; investing in Iran or in property owned or controlled by the government of Iran; exportation of goods, technology, or services for which the end user is Iran or the government of Iran; and engaging in transactions or financing related to Iran-origin goods or services.	The President is authorized to terminate sanctions, in whole or in part; advanced notification is required, except in the event of "exigent circumstances," in which case notification is required no later than three working days after the exercise of this authority.
COMPREHENSIVE IRAN SANCTIONS, ACCOUNTABILITY, AND DIVESTMENT ACT OF 2010 (CISADA)			
P.L. 111-195, as amended; 22 U.S.C. 8501 et seq.			
Sec. 103 (22 U.S.C. 8512)	Non-proliferation; human rights; anti-terrorism	Sec. 103(b)(1) prohibits U.S. imports of goods or services of Iranian origin, with certain exceptions, including those provided for in IEEPA. Sec. 103(b)(2) prohibits U.S. exports of and U.S. persons from exporting goods, services, or technology of U.S. origin to Iran. Certain exceptions apply, including those provided for in IEEPA, as well as exports of food, medicine, and humanitarian assistance, certain internet communications-related services, goods, and technologies, certain services, goods, and technologies necessary to ensure the safe operation of commercial aircraft; certain services, goods, and technologies related to support for certain international or nongovernmental organizations; and certain services, goods, and technologies determined by the President to be "in the national interest of the United States." Sec. 103(b)(3) requires the President to impose asset freezing sanctions on persons in Iran that the President determines meets the criteria for imposing IEEPA-based sanctions, including funds or assets transferred to any family member	With respect to sanctions under Sec. 103(b)(3), the President is directed to release frozen assets or funds if the sanctioned person no longer satisfies the criteria for designation with respect to the imposition of IEEPA-based sanctions. Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)). The President may waive the application of sanctions under Sec. 103(b) if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		or associate acting on behalf of the person.	
Sec. 104 (22 U.S.C. 8513)	Anti-money laundering; anti-terrorism; non-proliferation	Sec. 104(c) directs the Secretary of the Treasury to regulate, prohibit, or impose strict conditions on the opening or maintaining in the United States of a correspondent account or payable-through account by a foreign financial institution that the Secretary finds knowingly engages in facilitating Iran's acquisition of weapons of mass destruction (WMD); facilitating Iran's support of foreign terrorist organizations; facilitating the activities of persons subject to UN Security Council sanctions related to Iran; engaging in money laundering to carry out sanctionable activities described above; facilitating Iran's Central Bank or other Iranian financial institutions in sanctionable activities described above; or facilitating a significant transaction, transactions, or providing significant financial services for the IRGC or others subject to IEEPA sanctions for their connection with Iran's weapons proliferation or support for international terrorism (the Secretary of the Treasury is also required to determine and report on whether the National Iranian Oil Company (NIOC) or the National Iranian Tanker Company (NITC) are agents or affiliates of the IRGC). If the Secretary of the Treasury determines that the NIOC or NITC are sanctionable under Sec. 104(c)(2)(E), regulations may apply with respect to foreign financial institutions facilitating a significant transaction, transactions, or providing significant financial services for the NIOC or NITC for the purchase of petroleum or petroleum products from Iran (only if a determination under Sec. 1245(d)(4)(B) of the FY2012 NDAA has been made and unless an exception under Sec. 1245(d)(4)(D) of the FY2012 NDAA has been invoked).	The Secretary of the Treasury may waive the application of a prohibition or imposition of conditions on the opening or maintaining in the United States of a correspondent account or payable-through account by a foreign financial institution if the Secretary determines that such a waiver "is necessary to the national interest of the United States"; advanced notification required (Sec. 104(f)). Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)).
Sec. 104A (22 U.S.C. 8513b)	Anti-money laundering; anti-	Requires the Secretary of the Treasury to expand the restrictions established in Sec. 104 (above) to	The Secretary of the Treasury may waive the application of a prohibition or imposition of conditions on the

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
	terrorism; non-proliferation	apply also to any foreign financial institution that facilitates, participates, or assists in activities identified in Sec. 104(c).	opening or maintaining in the United States of a correspondent account or payable-through account by a foreign financial institution if the Secretary determines that such a waiver "is necessary to the national interest of the United States"; advanced notification required (Sec. 104(f)). Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)).
Sec. 105 (22 U.S.C. 8514)	Human rights	Directs the President to impose IEEPA-based sanctions and U.S. visa/entry restrictions on persons the President identifies as responsible for or complicit in the human rights crackdown around the 2009 national election.	The President may terminate sanctions when the President determines and certifies that the government of Iran has unconditionally released all political prisoners detained around the 2009 election; ceased its practices of violence, unlawful detention, torture, and abuse of Iranian citizens engaged in peaceful political activity; investigated and prosecuted related killings, arrests, and abuses related to the 2009 election; and made public commitments to establishing an independent judiciary and upholding international human rights standards. The President may waive the requirement to impose or maintain sanctions with respect to a person under Sec. 105 if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).
Sec. 105A (22 U.S.C. 8514a)	Human rights	Directs the President to impose IEEPA-based sanctions and U.S. visa/entry restrictions on persons the President determines as having knowingly engaged in providing or providing services with respect to certain goods or technologies, including "sensitive technology," to Iran to facilitate human rights abuses. The President may invoke a special rule to avoid listing certain persons	Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		for sanctions if the President certifies that an individual is no longer engaging in or has taken significant verifiable steps toward stopping the sanctionable activity, and the President has received reliable assurances that the individual will not knowingly reengage in the sanctionable activity in the future. In the case of a person the President determines is sanctionable under this provision for having provided services with respect to specified goods or technologies to the IRGC, the President is also directed to impose other sanctions from among the menu of sanctions described in Sec. 6(a) of the ISA, as the President determines appropriate.	and ballistic missile launch technology" (Sec. 401(a)). The President may waive the requirement to impose or maintain sanctions with respect to a person under Sec. 105A if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).
Sec. 105B (22 U.S.C. 8514b)	Human rights	Directs the President to impose IEEPA-based sanctions and U.S. visa/entry restrictions on persons the President determines has engaged in censorship or other activities that limit the freedom of expression or assembly or limit access to print or broadcast media.	Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)). The President may waive the requirement to impose or maintain sanctions with respect to a person under Sec. 105B if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).
Sec. 105C (22 U.S.C. 8514c)	Human rights	Directs the President to impose IEEPA-based sanctions and U.S. visa/entry restrictions on persons the President determines has engaged in corruption or other activities relating to the diversion of goods (e.g., agricultural commodities, food, medicine, and medical devices) intended for the people of Iran or misappropriating the proceeds from the sale of such goods.	Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
			The President may waive the requirement to impose or maintain sanctions with respect to a person under Sec. 105C if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).
Sec. 106 (22 U.S.C. 8515)	Human rights	Prohibits, with certain exemptions, entering into or renewing contracts for the procurement of goods or services with a person that exports certain "sensitive technology" to Iran	Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)). The President may waive the requirement to apply the prohibition under Sec. 106 if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).
Sec. 108 (22 U.S.C. 8516)	International obligations	Authorizes the President to issue regulations to comply with UN Security Council resolutions.	Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)).
Sec. 303 (22 U.S.C. 8543)	Non-proliferation; anti-terrorism	Directs the President to designate a country as a "Destination of Diversion Concern" if the President determines, based on specified criteria, that it allows substantial diversion of export-controlled goods, services, or technologies to Iranian end-users or Iranian intermediaries that would materially contribute to Iran's development of certain weapons or support for international terrorism; requires the President to require licenses to export certain goods, services, or technologies to countries identified as a Destination of Diversion	The designation of a country as a Destination of Diversion Concern terminates when the President determines and certifies that the country has "adequately strengthened the export control system of the country" to prevent the diversion of certain goods, services, and technologies to Iranian end-users or Iranian intermediaries. Most of the provisions of CISADA, including sanctions under this section, terminate 30 days after the President certifies that Iran has ceased providing support for acts of international

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		Concern, with a presumption of denial. The President may delay for renewable 12-month periods, the imposition of the licensing requirement under this provision if the President determines and reports that the government of the country designated as a Destination of Diversion Concern is taking certain steps to institute and strengthen export controls, to comply with and enforce UN Security Council resolutions with respect to Iran, and determines that it is appropriate to carry out government-to-government activities to strengthen the export control of the country.	terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 401(a)). The President may waive the requirement to impose the licensing requirement under Sec. 303 if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 401(b)).
NATIONAL DEFENSE AUTHORIZATION ACT FOR FISCAL YEAR 2012 (FY 2012 NDAA)			
P.L. 112-81, as amended			
Sec. 1245 (22 U.S.C. 8513a)	Anti-money laundering; non-proliferation; anti-terrorism; sanctions evasion	Sec. 1245(b) designates the financial sector of Iran, including the Central Bank of Iran, as a "primary money laundering concern." Sec. 1245(c) directs the President to impose IEEPA-based property blocking sanctions on Iranian financial institutions if their property and interests in property are within U.S. jurisdiction. Sec. 1245(d) directs the President, with certain exceptions and limitations, to prohibit the opening and prohibit or impose strict conditions on the maintaining of a correspondent account or payable-through account in the United States by a foreign financial institution determined by the President to have knowingly conducted or facilitated any significant financial transaction with the Central Bank of Iran or another Iranian financial institution subject to IEEPA-based sanctions (only if a determination under Sec. 1245(d)(4)(B) of the FY2012 NDAA has been made and unless an exception under Sec. 1245(d)(4)(D) of the FY2012 NDAA has been invoked). A significant financial transaction includes those made by a "Chinese financial institution" that involves the purchase of Iranian petroleum	The President may waive the imposition of sanctions under Sec. 1245(d)(1) for renewable periods of 120 days if the President determines and reports that such a waiver is "in the national security interest of the United States" and certifies "that the country with primary jurisdiction over the foreign financial institution otherwise subject to the sanctions faced exceptional circumstances that prevented the country from being able to reduce significantly its purchases of petroleum and petroleum products from Iran." The provisions of Sec. 1245 terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 1245(i)).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		or petroleum products, as well as foreign financial institutions involving the purchase of Iranian unmanned aerial vehicles (UAV), UAV parts, or related UAV systems. Sec. 1245(d) also authorizes the President to impose IEEPA-based sanctions with respect to the Central Bank of Iran.	
IRAN THREAT REDUCTION AND SYRIA HUMAN RIGHTS ACT OF 2012 (ITRSHRA) P.L. 112-158, as amended; 22 U.S.C. 8701 et seq.			
Sec. 211 (22 U.S.C. 8721)	Non-proliferation; anti-terrorism	Directs the President to impose IEEPA-based sanctions, including those pursuant to E.O. 13882 or E.O. 13224, on persons the President determines knowingly sell, lease, or provide a vessel, insurance, reinsurance, or any other shipping service for the transportation to or from Iran of goods that could materially contribute to the government of Iran's proliferation activities or support for acts of international terrorism.	The President may waive the requirement to impose sanctions with respect to a person if the President determines and reports that such a waiver is "vital to the national security interests of the United States"; advanced notification required. Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 212 (22 U.S.C. 8722)	Non-proliferation; anti-terrorism	Directs the President, with certain exceptions related to underwriters and insurance providers, to impose five or more of the sanctions described in Sec. 6(a) of the ISA, with respect to a person the President determines knowingly provides underwriting services, insurance, or reinsurance for the NIOC, NITC, or any successor entities; certain exceptions may apply. The President is authorized not to impose sanctions under this section with respect to a person if the President receives reliable assurances that the person will terminate otherwise sanctionable activity within 120 days of enactment.	Certain ISA provisions apply, including certain ISA waivers and the ISA's termination date. Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
Sec. 213 (22 U.S.C. 8723)	Non-proliferation; anti-terrorism	Directs the President to impose five or more of the sanctions described in Sec. 6(a) of the ISA, with respect to a person the President determines knowingly purchases, subscribes to, or facilitates the issuance of Iranian sovereign debt or debt of any entity owned or controlled by the government of Iran.	Certain ISA provisions apply, including certain ISA waivers and the ISA's termination date. Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 217 (22 U.S.C. 8724)	Non-proliferation; anti-terrorism	No new restrictions specified; refers to existing IEEPA-based sanctions under E.O. 13599 and E.O. 13608, and with respect to the Central Bank of Iran.	The President is only authorized to lift sanctions described in Sec. 217(a) (IEEPA-based sanctions imposed pursuant to E.O. 13599) 90 days after the President certifies that the Central Bank of Iran is not engaging in activities related to weapons proliferation or terrorism. The President is only authorized to lift sanctions described in Sec. 217(b) (IEEPA-based sanctions imposed pursuant to E.O. 13608) 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology." The President is only authorized to lift sanctions described in Sec. 217(c) (IEEPA-based sanctions on the Central Bank of Iran) 90 days after the President certifies that the Central Bank of Iran is not engaging in activities related to weapons proliferation or terrorism.
Sec. 218 (22 U.S.C. 8725)	Non-proliferation; anti-terrorism	Extends IEEPA-based prohibitions imposed on U.S. parent companies to their foreign subsidiaries for knowingly engaging in transactions with the government of Iran.	Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
			ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 220 (22 U.S.C. 8726)	Non-proliferation; anti-terrorism	Authorizes the President, unless an exception applies (see Sec. 220(c)(2)), to impose sanctions pursuant to Sec. 104 CISADA or IEEPA with respect to a person that continues to knowingly and directly provide specialized financial messaging services to or knowingly enable or facilitate access to such messaging services for Central Bank of Iran or certain other restricted financial institutions.	Several ITRSHRA provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 221 (22 U.S.C. 8727)	Non-proliferation; anti-terrorism; human rights	Directs the President to identify senior Iranian government officials involved in Iran's illicit nuclear activities or proliferation of weapons of mass destruction, support for international terrorism, or serious human rights abuses, or a family member of such officials.	The President may waive the identification of an individual on the list or the imposition of U.S. visa and entry sanctions with respect to an individual if the President determines that such a waiver is "essential to the national interests of the United States"; advanced notification required.
		Directs the Secretary of State to deny visas to listed persons and the Secretary of Homeland Security to exclude such persons from the United States, unless an exception applies (see Sec. 221(d)).	Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 301 (22 U.S.C. 8741)	National security; non-proliferation	Directs the President to identify in a list officials, agents, or affiliates of the IRGC and impose IEEPA-based sanctions.	The President may waive the identification of an individual on the list or the imposition of U.S. visa and entry sanctions with respect to an individual if the President determines

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		Directs the Secretary of State to deny visas to listed persons and the Secretary of Homeland Security to exclude such persons from the United States, unless an exception applies (see Sec. 301(d)(2)). The President is authorized not to identify a foreign person in the list required by this section or make a designation pursuant to Sec. 301(a), if the President determines and reports that doing so "would cause damage to the national security of the United States" (Sec. 302(e)).	that such a waiver is "vital to the national interests of the United States." Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 302 (22 U.S.C. 8742)	National security; non-proliferation	Directs the President to identify in a report foreign persons that the President determines materially engages in support of transactions with the IRGC or certain related entities. For those determined to knowingly engage in sanctionable activity, directs the President to impose five or more of the sanctions described in Sec. 6(a) of the ISA and authorizes the President to impose additional IEEPA-based sanctions. The President is authorized not to identify a foreign person in the report required by this section if the President determines and reports that doing so "would cause damage to the national security of the United States" (Sec. 302(e)).	The President may terminate a sanction imposed with respect to a foreign person under this section if the President determines that the person no longer engages in the activity for which the sanction was imposed and has provided assurances to the President that the person will not engage in such activity in the future. The President may waive the imposition of sanctions with respect to a foreign person under this section if the President determines that the person has ceased the sanctionable activity and has taken measures to prevent a recurrence of the activity or determines that "it is essential to the national security interests of the United States to do so." Certain ISA provisions apply, including certain ISA waivers and the ISA's termination date. Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
			ballistic missile launch technology" (Sec. 605).
Sec. 303 (22 U.S.C. 8743)	Non-proliferation; UN compliance	Directs the President to report and determine whether any agency of a foreign country knowingly and materially assisted or engaged in support or a significant transaction with a foreign person affiliated with the IRGC and subject to IEEPA-bases sanctions or any entity subject to UN Security Council sanctions. Authorizes the President, with some exceptions, to cut off most foreign aid, deny arms sales and transfers, deny export licenses, require opposition to loans to that foreign agency by international financial institutions, deny U.S. government financial assistance, or impose other IEEPA-based sanctions. If the President chooses not to impose one or more of the sanctions authorized in this section, the President is required to report and explain the decision.	The President may terminate measures imposed with respect to an agency pursuant to this section if the President determines that the objectionable activities have ceased or if "it is essential to the national security interests of the United States to terminate such measures." Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology" (Sec. 605).
Sec. 411 (22 U.S.C. 8751)	Human rights; non-proliferation; anti-terrorism	No new restrictions specified; refers to E.O. 13606.	The President is only authorized to lift IEEPA-based sanctions described in E.O. 13606 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology."
Sec. 501 (22 U.S.C. 8771)	Non-proliferation	Directs the Secretaries of State and Homeland Security to deny U.S. visas and entry, respectively, to Iranian citizens who seek education in the United States related to energy, nuclear science, or nuclear engineers.	Most of ITRSHRA's sanctions provisions, including sanctions under this section, terminate 30 days after the President certifies, pursuant to Sec. 401(a) of CISADA, that Iran has ceased providing support for acts of international terrorism, no longer satisfies the requirements for designation as a state sponsor of terrorism, and has "ceased the pursuit, acquisition, and development of, and verifiably dismantled its nuclear, biological, and chemical weapons and ballistic missiles and

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
			ballistic missile launch technology" (Sec. 605).
Sec. 603 (22 U.S.C. 8783)	General foreign policy reasons	Authorizes the President to apply sanctions in this act or amendments made by this act to certain natural gas projects only if the President certifies that an entity owned or controlled by the government of Iran or organized under the laws of Iran with the participation or approval of the government of Iran has assumed an operational role in the covered natural gas project or the percentage of equity interest in the project held by or on behalf of an Iranian government-related entity has increased relative to the equity share held on January 1, 2002.	N/A
IRAN FREEDOM AND COUNTER-PROLIFERATION ACT OF 2012 (IFCA)			
Title XII, subtitle D of P.L. 112-239 (National Defense Authorization Act for Fiscal Year 2013); 22 U.S.C. 8801 et seq.			
Sec. 1244 (22 U.S.C. 8803)	Non-proliferation	Sec. 1244(b) designates entities that operate ports in Iran, and entities in Iran's energy, shipping, and shipbuilding sectors, including NIOC, NITC, the Islamic Republic of Iran Shipping Lines (IRISL), and their affiliates as "entities of proliferation concern." Sec. 1244(c) directs the President, with certain exceptions (see Sec. 1244(c)(1)(B), Sec. 1244(e), and Sec. 1244(f)), to block and prohibit all transactions in property and interests in property within U.S. jurisdiction of any person the President determines is part of the Iranian energy, shipping, or shipbuilding sectors; operates a port in Iran; or knowingly provides significant support for an activity or transaction that benefits sanctionable persons described above or an Iranian person subject to asset blocking sanctions (other than an Iranian financial institution). Sec. 1244(d)(1) directs the President, with certain exceptions (see Sec. 1244(d)(1)(B), Sec. 1244(e), and Sec. 1244(f)), to impose five or more of the sanctions described in Sec. 6(a) of the ISA with respect to a person the President determines knowingly transfers to or from Iran goods or	The President may waive the imposition of sanctions under this section for renewable periods of not more than 180 days if the President determines and reports that such a waiver "is vital to the national security of the United States." With respect to Sec. 1244(d), certain ISA provisions apply, including certain ISA waivers and the ISA's termination date.

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		services used in connection with the energy, shipping, or shipbuilding sectors of Iran. Sec. 1244(d)(2) directs the President, with certain exceptions (see Sec. 1244(e) and Sec. 1244(f)), to prohibit the opening and prohibit or impose strict conditions on the maintaining in the United States of a correspondent account or payable-through account by a foreign financial institution that the President determines knowingly conducts or facilitates a significant financial transaction for the trade in goods or services to or from Iran related to the energy, shipping, or shipbuilding sectors of Iran. Sanctions in this section apply only if a determination under Sec. 1245(d)(4)(B) of the FY2012 NDAA has been made and unless an exception under Sec. 1245(d)(4)(D) of the FY2012 NDAA has been invoked. Sanctions in this section also do not apply to some aspects of trade to or from Iran of natural gas.	
Sec. 1245 (22 U.S.C. 8804)	Non-proliferation	Sec. 1245(a) directs the President, with certain exceptions (including with respect to persons exercising due diligence), to impose five or more of the sanctions described in Sec. 6(a) of the ISA with respect to a person the President determines knowingly engages in trade related to precious metal and certain other material, including that which is used in connection with Iran's energy, shipping, or shipbuilding sectors. Sec. 1245(c) directs the President, with certain exceptions (including with respect to persons exercising due diligence), to prohibit the opening and prohibit or impose strict conditions on the maintaining in the United States of a correspondent account or payable-through account by a foreign financial institution that the President determines knowingly conducts or facilitates a significant financial transaction for the trade in to or from Iran in materials that would subject a person to sanctions under subsection (a).	The President may waive the imposition of sanctions under this section for renewable periods of not more than 180 days if the President determines and reports that such a waiver "is vital to the national security of the United States." Certain ISA provisions apply, including certain ISA waivers and the ISA's termination date.

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
Sec. 1246 (22 U.S.C. 8805)	Non-proliferation; anti-terrorism	Directs the President, with certain exceptions (see Sec. 1246(a)(2), Sec. 1246(c), and Sec. 1246(d) [relating to persons that have exercised due diligence]), to impose five or more of the sanctions described in Sec. 6(a) of the ISA with respect to a person the President determines knowingly provides underwriting services or insurance or reinsurance for certain sanctionable activity related to Iran's energy, shipping, or shipbuilding sectors; trade to or from Iran of certain materials; or sanctioned persons with respect to Iran.	The President may waive the imposition of sanctions under this section for renewable periods of not more than 180 days if the President determines and reports that such a waiver "is vital to the national security of the United States." Certain ISA provisions apply, including certain ISA waivers and the ISA's termination date.
Sec. 1247 (22 U.S.C. 8806)	Non-proliferation	Directs the President, with an exception for humanitarian assistance, to prohibit the opening and prohibit or impose strict conditions on the maintaining in the United States of a correspondent account or payable-through account by a foreign financial institution that the President determines knowingly facilitates a significant financial transaction on behalf of any Iranian person listed as a Specially Designated National and Blocked Person (SDN list). Sanctions in this section apply only if a determination under Sec. 1245(d)(4)(B) of the FY2012 NDAA has been made and unless an exception under Sec. 1245(d)(4)(D) of the FY2012 NDAA has been invoked. Sanctions in this section also do not apply to some aspects of trade to or from Iran of natural gas.	The President may waive the imposition of sanctions under this section for renewable periods of not more than 180 days if the President determines and reports that such a waiver "is vital to the national security of the United States."

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
Sec. 1248 (22 U.S.C. 8807)	Human rights	Directs the President, with an exception relating to the importation of goods, to impose sanctions described in Sec. 105(c) of CISADA (see above) to the Islamic Republic of Iran Broadcasting and the President of that entity and to add this entity and individual to the SDN list.	Sanctions imposed, consistent with Sec. 105(c) of CISADA, are to terminate, consistent with Sec. 105(d) of CISADA, which authorizes the President to terminate sanctions when the President determines and certifies that the government of Iran has unconditionally released all political prisoners detained around the 2009 election; ceased its practices of violence, unlawful detention, torture, and abuse of Iranian citizens engaged in peaceful political activity; investigated and prosecuted related killings, arrests, and abuses related to the 2009 election; and made public commitments to establishing an independent judiciary and upholding international human rights standards (Sec. 1248(b)(3)). Sanctions imposed, consistent with Sec. 105(c) of CISADA, may be waived, consistent with Sec. 401(b) of CISADA, with authorizes the President to waive the requirement to impose or maintain sanctions with respect to a person under Sec. 105 if the President determines and reports that such a waiver is "in the national interest of the United States" (Sec. 1248(b)(3)).
COUNTERING IRAN'S DESTABILIZING ACTIVITIES ACT OF 2017			
Title I of P.L. 115-44 (Countering America's Adversaries Through Sanctions Act (CAATSA)); 22 U.S.C. 9401 et seq.			
Sec. 104 (22 U.S.C. 9403)	Non-proliferation (ballistic missiles)	Directs the President, with certain exceptions (see Sec. 111), to impose IEEPA-based sanctions and U.S. visa and entry bans with respect to any person that the President determines knowingly engages in an activity that materially contributes to Iran's ballistic missile program or any other Iranian program for developing systems capable of delivering WMDs; constructed in the context of E.O. 13382.	Sec. 112 authorizes the President to waive, on a case-by-case basis for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States"; advanced notification required.
Sec. 105 (22 U.S.C. 9404)	Anti-terrorism	Directs the President, with certain exceptions (see Sec. 111), to impose IEEPA-based sanctions with respect to the IRGC and foreign persons that are officials, agents, or affiliates of the IRGC; constructed in the context of E.O. 13224.	Sec. 112 authorizes the President to waive, on a case-by-case basis for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States"; advanced notification required.

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
Sec. 106 (22 U.S.C. 9405)	Human rights	Authorizes the President, with certain exceptions (see Sec. 111), to impose IEEPA-based sanctions on persons the Secretary of State identifies as "responsible for extrajudicial killings, torture, or other gross violations of internationally recognized human rights" against Iranians who seek to expose illegal activity carried out by Iranian officials or to defend internationally recognized human rights and freedoms.	Sec. 112 authorizes the President to waive, on a case-by-case basis for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States"; advanced notification required.
Sec. 107 (22 U.S.C. 9406)	Non-proliferation; anti-terrorism	Directs the President, with certain exceptions (see Sec. 107(d) and Sec. 111), to impose IEEPA-based sanctions and U.S. visa and entry bans on any person the President determines knowingly engages in activity that materially contributes to arms trade with Iran. Sec. 107(d) excepts from sanctions those the President certifies as engaging activity "in the national security interest of the United States" and that Iran "no longer presents a significant threat to the national security of the United States and to the allies of the United States"; "has ceased providing operational or financial support for acts of international terrorism"; and "no longer satisfies the requirements for designation as a state sponsor of terrorism."	Sec. 112 authorizes the President to waive, on a case-by-case basis for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States"; advanced notification required.
Sec. 108 (22 U.S.C. 9407)	Non-proliferation; anti-terrorism	Directs the President to review, five years after enactment, all Iran-related SDNs to determine the applicability of IEEPA-based sanctions related to ballistic missile proliferation (pursuant to E.O. 13382) or terrorism (pursuant to E.O. 13224). Directs the President to impose sanctions on those for which the President determines that sanctions under the above-listed E.O.s are applicable.	Sec. 112 authorizes the President to waive, on a case-by-case basis for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States"; advanced notification required.
MASIH ALINEJAD HUNT ACT OF 2022			
Division AA, Title II of P.L. 117-328 (Consolidated Appropriations Act, 2023); 22 U.S.C. 8561 et seq.			
Sec. 204 (22 U.S.C. 8563)	Human rights; anti-corruption	Directs the President, with certain exceptions (see Sec. 206 and Sec. 207), to impose IEEPA-based and U.S. visa and admissibility sanctions on foreign persons the Secretary of State, in consultation with others, identifies as working as part of or	Sec. 206(b) authorizes the President to waive the application of sanctions under Sec. 204 with respect to a person if the President determines and reports that the waiver "is in the

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		on behalf of the Iranian government or its proxies and determines to have knowingly been involved in the surveillance, harassment, kidnapping, illegal extradition, imprisonment, torture, killing or assassination of Iranian or U.S. citizens who seek to expose illegal or corrupt activity by Iranian officials or exercise or defend human rights in Iran.	national interests of the United States."
Sec. 205 (22 U.S.C. 8564)	Human rights; anti-corruption	Authorizes the Secretary of the Treasury, with certain exceptions (see Sec. 206 and Sec. 207), to prohibit the opening or prohibit or impose strict conditions on the maintaining in the United States of a correspondent account or a payable-through account by a foreign financial institution the Secretary of the Treasury identifies as knowingly conducting a significant transaction with a foreign person identified by the Secretary of State pursuant to Sec. 204(a).	N/A
STOP HARBORING IRANIAN PETROLEUM (SHIP) ACT			
Division J of P.L. 118-50 (Making emergency supplemental appropriations for the fiscal year ending September 30, 2024, and other purposes); 22 U.S.C. 8571 et seq.			
Sec. 3 (22 U.S.C. 8572)	Non-proliferation; anti-terrorism	Directs the President to impose, with certain exceptions (see Sec. 3(c)(3)(C), Sec. 3(f), and Sec. 3(g)), sanctions on any foreign person the President determines owns or operates a foreign port at which such person knowingly allows a vessel to dock that is sanctioned for transporting Iranian crude oil or petroleum products or whose operator or owner knowingly engages in a significant transaction involving Iranian petroleum or petrochemical products; owns or operates a vessel through which the owner knowingly conducts ship to ship transfers involving a significant transaction of Iranian-origin petroleum products; owns or operates a refinery through which the owner knowingly engages in a significant transaction to process Iranian-origin petroleum products; or is a family member of or is owned or controlled by a foreign person described above. Sanctions include authority to impose U.S. port landing prohibitions, IEEPA-	Sec. 3(h)(1) authorizes the President to waive, on a case-by-case basis for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States." Authorities provided in this section cease to have effect 30 days after the President certifies that "the Government of Iran no longer repeatedly provides support for international terrorism"; and "Iran has ceased the pursuit, acquisition, and development of, and verifiably dismantled its, nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology."

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		based sanctions, and U.S. visa and admissibility restrictions. Sec. 3(h)(2) provides a special rule that directs the President not to impose sanctions on foreign persons the President certifies as no longer engaging in sanctionable activities or "has taken and is continuing to take significant, verifiable steps toward permanently terminating such activities."	
FIGHT AND COMBAT RAMPANT IRANIAN MISSILE EXPORTS (FIGHT CRIME) ACT			
Division K of P.L. 118-50 (Making emergency supplemental appropriations for the fiscal year ending September 30, 2024, and for other purposes); 22 U.S.C. 9421 et seq. Sec. 6 sunsets four years after enactment.			
Sec. 5 (22 U.S.C. 9423)	Non-proliferation (missiles)	Requires, with certain exceptions (see Sec. 5(g)), the imposition of IEEPA-based and U.S. visa and admissibility sanctions on foreign persons the President determines knowingly engage in activities that contribute to the development of Iran-related missiles or drones and missile technology or is an adult family member of certain sanctionable persons.	Sec. 5(d) authorizes the President to waive, for renewable periods of not more than 180 days, sanctions with respect to a person if the President determines and reports that such a waiver "is vital to the national security interests of the United States"; advanced notification required. Sec. 5 ceases to be effective 30 days after the President certifies that "the Government of Iran no longer repeatedly provides support for international terrorism"; and "Iran has ceased the pursuit, acquisition, and development of, and verifiably dismantled its, nuclear, biological, and chemical weapons and ballistic missiles and ballistic missile launch technology."
Sec. 6	Anti-terrorism	Directs the President to designate any person identified by the Secretary of State as an Iranian person that has attacked a U.S. citizen using a combat UAV as a foreign terrorist organization. The President is prohibited from revoking a designation made under this provision for four years.	The Secretary of State is authorized to waive the requirements of this section if the Secretary determines that such a waiver "is in the vital national security interests of the United States." The section terminates four years after enactment.
MAHSA AMINI HUMAN RIGHTS AND SECURITY ACCOUNTABILITY (MAHSA) ACT			
Division L of P.L. 118-50 (Making emergency supplemental appropriations for the fiscal year ending September 30, 2024, and for other purposes); 22 U.S.C. 8501 note			
Sec. 2 (22 U.S.C. 8501 note)	Human rights; anti-terrorism	Directs the President to determine whether certain specified foreign persons, including the Supreme Leader of Iran, the President of Iran, and any entity overseen by the Office of the Supreme Leader that is complicit in financing or resourcing of human rights abuses	Pursuant to Sec. 105(d) of CISADA, the President may terminate sanctions described in Sec. 105(c) of CISADA when the President determines and certifies that the government of Iran has unconditionally released all political prisoners detained around the 2009 election; ceased its practices of violence, unlawful detention, torture, and abuse of Iranian citizens engaged

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		or support for terrorism, meet the criteria for specified sanctions. Specified sanctions include those described in Sec. 105(c) of CISADA, IEEPA-based sanctions under E.O. 13553, E.O. 13224, E.O. 13818, and E.O. 13876, and U.S. entry restrictions in Sec. 7031(c) of the Department of State, Foreign Operations, and related Programs Appropriations Act, 2021.	in peaceful political activity; investigated and prosecuted related killings, arrests, and abuses related to the 2009 election; and made public commitments to establishing an independent judiciary and upholding international human rights standards. Pursuant to Sec. 401(b) of CISADA, the President may waive the requirement to impose or maintain sanctions with respect to a person under Sec. 105 of CISADA if the President determines and reports that such a waiver is "in the national interest of the United States." Pursuant to Sec. 7031(c) of the Department of State, Foreign Operations, and related Programs Appropriations Act, 2021, the Secretary of State may waive the application of the U.S. entry ineligibility with respect to an individual for a "compelling national interest" or if circumstances that caused the individual to be ineligible have changed sufficiently.
NO TECHNOLOGY FOR TERROR ACT			
Division N of P.L. 118-50 (Making emergency supplemental appropriations for the fiscal year ending September 30, 2024, and for other purposes); 22 U.S.C. 4811 note. Act sunsets seven years after enactment.			
Sec. 2 (50 U.S.C. 4811 note)	Anti-terrorism	Requires, with certain exceptions, the application of foreign-direct product rules and licensing requirements for certain foreign-produced items that are exported or in-country transferred to Iran from abroad or involves the government of Iran.	The Secretary of Commerce may waive the requirements of this section if the Secretary determines and reports that the waiver "is in the national interests of the United States." The authority provided in this section terminates seven years after enactment.
HOLDING IRANIAN LEADERS ACCOUNTABLE ACT OF 2024			
Division R of P.L. 118-50 (Making emergency supplemental appropriations for the fiscal year ending September 30, 2024, and for other purposes); 22 U.S.C. 8501 note. Act sunsets five years after enactment, or earlier.			
Sec. 4 (22 U.S.C. 8501 note)	Anti-money laundering; anti-terrorism	Directs the Secretary of the Treasury, with certain exceptions (see Sec. 5), to require U.S. financial institutions to close accounts connected to certain senior Iranian officials described in the report required by Sec. 3 and prohibit the provision of significant financial services to such persons. Also directs the Secretary to "actively seek," with respect to foreign financial institutions, the closure of accounts connected to certain senior Iranian officials described in	The Secretary of the Treasury may "suspend" the application of sanctions with respect to a financial institution if the Secretary reports that the suspension "is in the national interest of the United States." The provisions of this act have no force or effect five years after enactment or 30 days after the Secretary of the Treasury reports that "Iran is not a jurisdiction of primary money laundering concern" or "the Government of Iran is providing significant cooperation to the United

Statutory Basis	Rationale	Restriction	Authority to Lift or Waive
		the report required by Sec. 3 and prohibit the provision of significant financial services to such persons. Certain natural persons or financial institutions may be exempt from inclusion in the report required by Sec. 3 if the President makes certain determinations (Sec. 3). The President may waive, in one-year increments, reporting requirements in Sec. 3 if the President reports and explains why a waiver "is in the national interest of the United States" (Sec. 3).	States for the purpose of preventing acts of international terrorism, or for the promotion of any other strategic objective that is important to the national interest of the United States" (Sec. 6).

Source: CRS.

Notes: See statute for full description of restrictions and authorities to lift or waive sanctions. AECA = Arms Export Control Act; CISADA = Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010; DNI = Director of National Intelligence; E.O. = Executive Order; FTO = Foreign Terrorist Organization; IAEA = International Atomic Energy Agency; IEEPA = International Emergency Economic Powers Act; IFI = International Financial Institution; IFSA = Iran Freedom Support Act; IIANA = Iran-Iraq Arms Non-Proliferation Act of 1992; INA = Immigration and Nationality Act of 1952; INKSNA = Iran, North Korea, Syria Nonproliferation Act; IRGC = Iranian Revolutionary Guard Corps; ISA = Iran Sanctions Act of 1996; ITRSHRA = Iran Threat Reduction and Syria Human Rights Act of 2012; NDAA = National Defense Authorization Act; NEA = National Emergencies Act; NICO = Naftiran Intertrade Company; NIOC = National Iranian Oil Company; NITC = National Iranian Tanker Company; SDN = Specially Designated National; TSRA = Trade Sanctions Reform Act of 2000; UNICEF = UN Children's Fund; UNPA = United Nations Participation Act of 1945; UNSC = United Nations Security Council; USC = United States Code; USML = United States Munitions List; USTR = U.S. Trade Representative; WMD = Weapons of Mass Destruction.

Table 2. Executive Orders Issued to Meet Statutory Requirements to Impose Economic Sanctions on Iran

Executive Order	Underlying Statute	Restriction	Authority To Lift or Waive
E.O. 12170 (November 14, 1979)	IEEPA/NEA	Declares a national emergency exists relating to 1979 events in Iran; blocks Iranian government property subject to U.S. jurisdiction. Secretary of the Treasury administers.	President
E.O. 12938 (November 14, 1994) as amended by E.O. 13094 (July 28, 1998) E.O. 13382 (June 28, 2005)	IEEPA/NEA AECA (also invoked in Sec. 3(b)(1), INKSNA)	Declares a national emergency exists relating to the proliferation of weapons of mass destruction and the means of delivery. Succeeds and replaces similar authorities of 1990 and 1994. Establishes export controls, sanctions affecting foreign aid, procurement, imports, on proliferators. Establishes sanctions—affecting foreign aid, IFI support, credits, arms sales, exports, imports, landing rights—targeting foreign countries that produce or use chemical or biological weapons. Secretaries of State, Commerce, Defense, and the Treasury administer.	President

Executive Order	Underlying Statute	Restriction	Authority To Lift or Waive
E.O. 12957 (March 15, 1995)	IEEPA/NEA	Declares a national emergency exists relating to Iran's proliferation activities; prohibits persons under U.S. jurisdiction from entering into certain transactions with respect to Iranian petroleum resources. Secretaries of the Treasury and State administer.	President Sec. 101(a), IFSA, codifies this E.O. The President must notify Congress 15 days in advance of its termination, unless exigent circumstances justify acting first.
E.O. 12959 (May 6, 1995) as modified by E.O. 13059 (August 19, 1997)	IEEPA/NEA ISDCA '85	Expands national emergency set forth in E.O. 12957; prohibits entering into new investment. Secretaries of the Treasury and State administer.	President Sec. 101(a), IFSA, codifies this E.O. The President must notify Congress 15 days in advance of its termination, unless exigent circumstances justify acting first.
E.O. 13059 (August 19, 1997)	IEEPA/NEA ISDCA '85	Clarifies steps taken in E.O. 12957 and E.O. 12959; prohibits most imports from Iran, exports to Iran, new investment, transactions relating to Iran-origin goods regardless of their location Secretaries of the Treasury and State administer.	President Sec. 101(a), IFSA, codifies this E.O. The President must notify Congress 15 days in advance of its termination, unless exigent circumstances justify acting first.
E.O. 13224 (September 23, 2001) as amended by E.O. 13268 (July 2, 2002) E.O. 13284 (January 23, 2003) E.O. 13372 (February 16, 2005) E.O. 13886 (September 9, 2019)	IEEPA/NEA UNPA '45 (also invoked in Sec. 211, ITRSHRA)	Declares a national emergency exists relating to international terrorism, in the aftermath of events of September 11, 2001; blocks property and prohibits transactions with persons who commit, threaten to commit, or support terrorism. Generates a list of designated individuals who are incorporated into the Specially Designated Nationals (SDN) list. Secretaries of the Treasury, State, Homeland Security, and the Attorney General administer.	President
E.O. 13382 (June 28, 2005)	IEEPA/NEA (also invoked in Sec. 211, ITRSHRA)	Expands national emergency set forth in E.O. 12938; blocks property of WMD proliferators and their supporters. Secretaries of State, the Treasury, and the Attorney General administer.	President
E.O. 13438 (July 17, 2007)	IEEPA/NEA	Expands national emergency relating to events in Iraq and set forth in E.O. 13303, May 22, 2003; blocks property of	President

Executive Order	Underlying Statute	Restriction	Authority To Lift or Waive
		certain persons who threaten stabilization efforts in Iraq. Secretaries of the Treasury, State, and Defense administer.	
E.O. 13553 (September 28, 2010)	IEEPA/NEA CISADA	Expands national emergency set forth in E.O. 12957; blocks property of certain persons with respect to human rights abuses by the government of Iran. Generates a list of designated individuals for whom property under U.S. jurisdiction is blocked. Imposes sanctions on those who enter into transactions with designated individuals. This is the initial implementation of requirements under CISADA. Secretaries of the Treasury and State administer.	President
E.O. 13599 (February 5, 2012)	IEEPA/NEA NDAA '12	Expands national emergency set forth in E.O. 12957; blocks property of the government of Iran and Iranian financial institutions, including the Central Bank of Iran. Secretaries of the Treasury, State, and Energy, and DNI administer.	President Sec. 217, ITRSHRA, requires the President notify Congress 90 days in advance of termination of this E.O., and certify a number of objectionable activities have ceased.
E.O. 13606 (April 22, 2012) as amended by E.O. 14312 (June 30, 2025)	IEEPA/NEA INA	Expands, in the case of Iran, national emergency set forth in E.O. 12957; blocks the property and suspends entry into the United States of persons found to commit human rights abuses by the governments of Iran and Syria, facilitated misuse of information technology. Generates new list of SDN. Secretaries of the Treasury and State administer.	President Sec. 411, ITRSHRA, requires the President notify Congress 30 days in advance of termination of this E.O., and certify a number of objectionable activities have ceased pursuant to Sec. 401, CISADA.
E.O. 13608 (May 1, 2012)	IEEPA/NEA INA	Expands, in the case of Iran, national emergency set forth in E.O. 12957; prohibits transactions with and suspends entry into the United States of foreign sanctions evaders. Generates new list of SDN. Secretaries of the Treasury and State administer.	President Sec. 217, ITRSHRA, requires the President notify Congress 30 days in advance of termination of this E.O., and certify a number of objectionable activities have ceased pursuant to Sec. 401, CISADA.
E.O. 13694 (April 1, 2015) as amended by E.O. 13757 (December 28, 2016) E.O. 13984	IEEPA/NEA INA	Authorizes the Secretary of the Treasury, in consultation with the Attorney General and the Secretary of State, to block property and interests in property of those found to have engaged in "cyber-enabled activities originating from ... outside the United States" that have affected a critical infrastructure sector, computers or networks, financial information, trade secrets, personal	President.

Executive Order	Underlying Statute	Restriction	Authority To Lift or Waive
(January 19, 2021) E.O. 14144 (January 16, 2025) E.O. 14306 (June 6, 2025)		identifiers, or election processes, among other targets.	
E.O. 13846 (August 6, 2018)	IEEPA/NEA ISA '96 CISADA ITRSHRA IFCA INA	Implements President Trump's decision to have the United States cease participation in the JCPOA. Reimposes all sanctions waived under that agreement: • blocks Iran's purchase of U.S. bank notes; • prohibits transactions with NIOC, NICO, and the Central Bank; • prohibits transactions with Iranian SDN; • imposes restrictions on transactions with Iran's energy, shipping, shipbuilding, or port sectors; • authorizes sanctions, including prohibitions on correspondent relationships, on foreign financial institutions financing Iran's auto sector, SDNs, NIOC, NICO, trade in Iran's petroleum market, or petrochemicals; • additional restrictions related to Iran's auto, petroleum, and petrochemical sectors; • prohibits US Export-Import Bank activities; • denies visas; • restricts access to the US financial system; and • imposes sanctions on those found to engage in diversion of goods or technology.	President.
E.O. 13871 (May 8, 2019)	IEEPA/NEA INA (also refers to IFCA)	Blocks assets and transactions related to trade in Iran's iron, steel, aluminum, or copper sectors.	President.
E.O. 13876 (June 24, 2019)	IEEPA/NEA INA	Blocks assets of and transactions with the Supreme Leader and his office, and in addition any person appointed by the Supreme Leader to an official position, any official, or affiliates.	President.

Executive Order	Underlying Statute	Restriction	Authority To Lift or Waive
E.O. 13902 (January 10, 2020)	IEEPA/NEA INA	Blocks assets of and transactions with those designated as operating in Iran's construction, mining, manufacturing, or textiles sectors, "or any other sector of the Iranian economy as may be determined by the Secretary of the Treasury, in consultation with the Secretary of State…."	President.
E.O. 13949 (September 21, 2020)	IEEPA/NEA CAATSA INA	Blocks assets of and transactions with those designated as engaging in "any activity that materially contributes to the supply, sale, or transfer, directly or indirectly, to or from Iran, or for the use in or benefit of Iran, of arms or related material, including spare parts."	President.
E.O. 14382 (February 6, 2026)	IEEPA/NEA Trade Act of 1974	Imposes an additional *ad valorem* rate of duty on U.S. imports from countries determined to have acquired any goods or services from Iran.	President. *On February 20, 2026, President Trump ordered the additional ad valorem duties imposed pursuant to E.O. 14382 to "no longer be in effect and, as soon as practicable, … no longer be collected" in E.O. 14389 (91 Federal Register 9437).*

Source: CRS.

Notes: Executive orders that have been revoked are excluded from this table. AECA = Arms Export Control Act; CISADA = Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010; DNI = Director of National Intelligence; E.O. = Executive Order; IEEPA = International Emergency Economic Powers Act; IFI = International Financial Institution; IFCA = Iran Freedom and Counter-proliferation Act of 2012; IFSA = Iran Freedom Support Act; INA = Immigration and Nationality Act of 1952; INKSNA = Iran, North Korea, Syria Nonproliferation Act; ISA = Iran Sanctions Act of 1996; ISDCA = International Security and Development Cooperation Act of 1985; ITRSHRA = Iran Threat Reduction and Syria Human Rights Act of 2012; JCPOA = Joint Comprehensive Plan of Action; NDAA = National Defense Authorization Act; NEA = National Emergencies Act; NICO = Naftiran Intertrade Company; NIOC = National Iranian Oil Company; SDN = Specially Designated National; UNPA = United Nations Participation Act of 1945; WMD = weapons of mass destruction.

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