

The Tragic Irony of the E3's Snapback Move on Iran



by Riccardo Alcaro

- France, Germany and the UK have triggered the snapback mechanism to reimpose UN sanctions on Iran, citing Tehran's violations of the 2015 nuclear deal or JCPOA.
- Iran rejects their authority to do so, arguing that the Europeans themselves breached the JCPOA by adhering to US sanctions and all but supporting Israel's June 2025 war.
- Lacking a diplomatic understanding by end September, Iran could leave the NPT, Israel resort to new strikes, and Russia and China refuse to recognise the sanctions, weakening the UNSC's authority.

France, Germany and the United Kingdom – the 'E3' – have a **special place** in the twenty-plus-years-long dispute over Iran's nuclear programme. Back in 2003, they were the strategically foresighted initiators of the diplomatic process that eventually resulted in the 2015 **Joint Comprehensive Plan of Action** (JCPOA), the nuclear deal between Iran and the E3 as well as China, Russia and the United States (plus the EU). In 2025, with their decision to activate the procedure to re-adopt UN sanctions, the E3 risk putting the last nail in the coffin of nuclear diplomacy with Iran.

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This article was produced in the framework of a project entitled 'Stability in the Middle East: Rethinking Diplomacy with Iran', which is funded by the Italian Ministry of Foreign Affairs.



What's snapback?

On 28 August 2025 the E3 sent a [letter](#) to the rotating presidency of the UN Security Council (UNSC), stating their intention to use a special mechanism, known as 'snapback', included in the JCPOA as well as in [UNSC Resolution 2231](#), designed to punish and possibly reverse Iran's significant and persistent non-compliance with its obligations under the deal.

If no understanding is reached by the end of September, the Security Council will have to vote on a resolution extending the sanctions relief granted to Iran when the JCPOA was concluded. The focus on voting for sanctions relief extension (rather than their reintroduction) was designed by US and E3 negotiators in 2014-15 to avoid the risk of China or Russia exerting their veto power.

The E3's view

On paper, the E3's decision relies on solid ground. Iran has been violating the JCPOA's limits to its nuclear activities and cooperation obligations with the International Atomic Energy Agency (IAEA), the UN nuclear watchdog, since May 2019. While Iran did so in retaliation against the US's [unilateral withdrawal](#) from the JCPOA the year before, the E3 can with some legitimacy argue that they have made efforts to [salvage the](#)

for the 400kg of 60 per cent-enriched uranium that went missing after the June 2025 war, and re-engaged in talks with the United States.

Underlying the E3's hardening is a shift in the set of priorities that have guided their action on Iran's nuclear issue: the attempt to safeguard the non-proliferation regime and Middle Eastern stability has been superseded by a desire to punish Iran for its drone and drone knowhow [transfers to Russia](#) after the invasion of Ukraine, the [crackdown on anti-regime protests](#) in autumn 2022, and the [arbitrary detention](#) of European nationals.

Iran's version

Backed by Russia and China, Iran has contested the E3's authority to trigger the snapback mechanism. The official reason is that the E3 have also been in breach of their JCPOA pledge to normalise economic relations with Iran, as they have de facto complied with the US extraterritorial sanctions reinstated in 2018.

But the E3's main fault, in Iran's eyes, is the [Orwellian transformation](#) of Israel's aggression of June 2025 into an act of self-defence against a country that was neither preparing an attack nor had taken the [decision](#) to build a nuclear weapon. As a matter of fact, Iran was attacked while nuclear talks with the US were [ongoing](#).

The E3 added insult to injury by taking positions in [contrast](#) with the JCPOA. The E3 now seem to contend that Iran has to give up on uranium enrichment altogether, the most sensitive part of a nuclear programme because of its potential diversion to military use, even though the whole edifice of the JCPOA was premised on Iran's ability to maintain an indigenous enrichment programme (though with temporary strict limits and under an intrusive IAEA verification system). French President Emmanuel Macron also argued that Iran had to cease support for nonstate militias across the region as well as limit its ballistic arsenal – again, two issues that had been kept out of the JCPOA. The latter

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[deal](#), including blocking a US attempt to trigger snapback in August 2020.

As further evidence of good faith, the E3 have offered a six-month extension of the snapback deadline, provided Iran granted IAEA inspectors full access to its nuclear programme, accounted



demand would imply that Tehran downgrade its missile capability at a time when missiles are its only available retaliation option. To Iran, the duplicity of the E3 was perfectly captured by German Chancellor Friedrich Merz's statement that Israel was doing the “dirty work” for the Europeans.

Contempt aside, having just suffered a devastating attack on its nuclear facilities, Iran is wary of giving away the location of the 60 per cent-enriched uranium, which could otherwise be targeted by Israel or the US; similarly, it may only be willing to restore full IAEA access as part and not as a precondition of a deal. The Iranian government stated that it is willing to engage with the US but only if Washington **guarantees** that it will neither participate in nor support another Israeli attack while talks are ongoing. Since the E3 cannot give such guarantees, Iran seems ready to endure the costs of UN sanctions.

The damage will be political rather than economic, as due to US extraterritorial sanctions Iran has been under a de facto international embargo since 2018. Still, UN sanctions will (amongst others) make it again illegal to trade in arms and ballistic technology with Iran and authorise inspection of cargo ships suspected of carrying prohibited items to it. Most importantly, UN sanctions will once more cast a shadow of illegitimacy on Iran's nuclear programme and make the Islamic Republic again an international pariah. Thus Iran, possibly through Russia's or China's good offices, may try to agree with the US on an extension of the snapback deadline and new negotiations before the UNSC vote.

The potential costs of snapback

Since the end of the June war, US President Donald Trump has seemed relatively uninterested in the issue, even contending that a deal with Iran is no longer necessary given that the latter's nuclear facilities have been “obliterated”. However, the reality is that the nuclear programme, while severely damaged, still exists. Furthermore, the Iranian leadership

is likely considering the option of secretly building a nuclear deterrent given Western untrustworthiness and Israel's belligerence.

The stage is thus set for possible diplomatic failure. An overconfident Trump Administration may pose preliminary conditions for renewed talks – such as zero enrichment and a cap on Iran's missile capacity – that Tehran finds unacceptable. A subsequent readoption of UN sanctions may have serious consequences not only for Iran, but for the whole region and even Europe itself.

In retaliation, Iran will most likely start the process to **abandon** the Nuclear Non-Proliferation Treaty (NPT), which is the legal

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basis for UN (and EU) sanctions. Even if it does not go that far, Tehran would still keep the IAEA out of the country. Israel would have a further incentive to carry out another attack, thus extending to Iran its longstanding strategy of repeatedly degrading its enemies' capabilities with continuous strikes. This strategy could plunge the Islamic Republic into chaos or result in another war, ushering in further regional destabilisation.

Moreover, the E3 would contribute to further delegitimising the UNSC if Russia and China were to ignore the sanctions on the grounds that the E3 had no authority to trigger snapback. Weakening the UNSC at a time when coercion and zero-sum competition are gaining the upper hand over rules-based multilateralism would inject further systemic instability into international relations.



Obligated or deliberate choice?

The E3 argue that Iran has left them no other choice but to resort to snapback. Supporters of their move emphasise that the Islamic Republic has historically responded to pressure, such as the extensive and draconian UN, US and EU sanctions which eventually led to the JCPOA. But the historical evidence also shows that Iran agreed to the deal because it was offered a reasonable way out of the crisis, namely sanctions relief and maintenance of an indigenous enrichment programme.

Pressure alone has never produced anything but a worsening of the situation. When the E3 in 2005 rejected its proposal to keep a largely symbolic enrichment capacity, Iran refused to back off (eventually, the E3 accepted a much bigger Iranian enrichment capacity in 2015). Similarly, in May 2025 the E3 pushed for an IAEA formal reprimand of Iran, arguing that it would make Tehran more amenable to concessions in its talks with the US. But the most direct outcome was that the resolution gave Israel a stronger justification for its attack on Iran.

If historical experience is any guide, the E3's move will make an already precarious situation worse. The E3 could have exercised greater strategic flexibility – and shown a modicum of 'strategic empathy' for a country that was pre-emptively attacked by two nuclear powers – proposing a short extension of the snapback deadline with less stringent conditions. Their choice to go another way was a deliberate one, and they will bear responsibility for its consequences.

By facilitating the process that led to the JCPOA, the E3 contributed to avoiding a regional conflict; strengthened the non-proliferation regime and the authority of the UNSC and the IAEA; revived the transatlantic partnership; and demonstrated the value of multipolar crisis management, inclusive of Western rivals such as Russia and China. It is a tragic irony that the E3-initiated snapback may have been the last straw to the progressive undoing of all these achievements.

5 September 2025

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