



Foreign &  
Commonwealth  
Office



Department  
for International  
Development

10 August 2020

Tom Tugendhat MP  
Chair, Foreign Affairs Committee  
House of Commons  
London  
SW1A 0AA

Dear Tom,

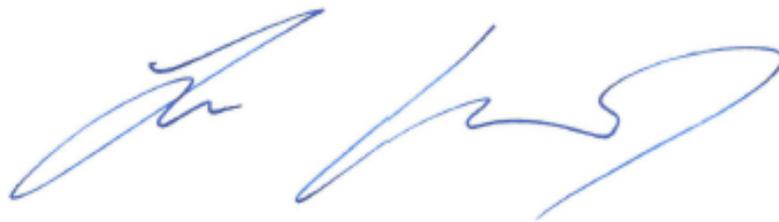
Thank you for your letter of 21 July highlighting a number of points on Iran which are of particular interest to the Committee. Please also accept my apologies for the delay in responding to the invitation to appear before the Committee on 14 July.

As you note, Iran's human rights record continues to be of serious concern to the UK, and the FCO has designated it as one of its Human Rights Priority Countries. The continued use of the death penalty, weak rule of law and restrictions on freedoms of expression, religion and belief are deeply worrying. We regularly raise human rights with the Iranians at all levels and we continue to take action with the international community to press Iran to improve its poor record on all human rights issues.

As you note, we recently announced the first tranche of sanctions under the Global Human Rights sanctions regime. We will continue to consider designations under the Global Human Rights Sanctions Regulations, but it would not be appropriate to speculate who may be designated under the sanctions regime in the future. It is important to ensure that all designations are underlined by a robust evidence case, ensuring that legal tests and policy objectives are met. This takes time to get right.

Along with other European states, we already have sanctions against 82 Iranians for serious human rights violations and one Iranian entity; all as an important part in keeping pressure on the Iranian regime to change its approach. The UK continues to implement the EU sanctions in the transition period.

In terms of proscribing the Islamic Revolutionary Guard Corps (IRGC), we have long expressed our deep concerns about the IRGC's destabilising activity both within and outside Iran, including its illicit economic activity, its role in Iran's ballistic missile development and support to non-state groups around the region. We do not routinely comment on whether an organisation is or is not under consideration for proscription. As we have consistently said, our priority is to counter destabilising behaviour through diplomatic means, including sanctions. In addition to the human rights designations discussed above, we have over 200 EU sanctions listings in place against Iran for nuclear-related and ballistic missile activity, including against the Islamic Revolutionary Guard Corps in its entirety and a number of associated individuals and entities.

A handwritten signature in blue ink, consisting of several fluid, connected strokes that form a cursive name.

**The Rt Hon. James Cleverly MP**  
**Minister of State for the Middle East and North Africa**



## Foreign Affairs Committee

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**From the Chair**  
Tom Tugendhat MP

Rt Hon James Cleverly MP  
Minister for Middle East and North Africa  
Foreign and Commonwealth Affairs  
King Charles Street  
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21 July 2020

Dear James

The Committee was disappointed to not have had the opportunity to discuss the Foreign Office's work on Iran with you last Tuesday (14 July). The request for your attendance was made on 1 June and followed up several times before we received your reply shortly before the session, without an explanation. I am grateful for your commitment to appear after the summer recess, preferably in September.

The Committee had hoped to discuss a number of issues with you, amongst them the status of the Islamic Revolutionary Guard Corps (IRGC) as a proscribed organisation, and the potential use of Magnitsky-style sanctions on human rights abusers within the Iranian regime.

The Committee welcomed the Foreign Secretary's announcement of 6 July that Global Magnitsky sanctions would be used against human rights abusers in Russia, Saudi Arabia, Myanmar and North Korea and wished to raise the possibility of broadening their usage. As you are aware, the human rights situation in Iran is dire and Iran has rightly been designated a human rights priority country for its treatment of dual nationals, suppression of individual liberties, and extensive use of the death penalty. Global Magnitsky sanctions seem well-suited to targeting these abuses, and the Committee is hopeful that the next round of designations will address what seems like a striking omission.

Further, the Committee took a significant amount of evidence on the possibility of the UK proscribing the IRGC in its entirety. As you are aware, parts of the IRGC are sanctioned through the EU and have been proscribed in the US since April 2019, as well as in Bahrain and Saudi Arabia, but the UK has not followed suit. A similar pattern characterised the proscription of Hezbollah which saw all its branches proscribed by the US from 1995, but not proscribed in its entirety by the UK until 2019. The Committee is concerned that a similar amount of time is not wasted in the case of the IRGC and that the Foreign Office and Home Office are able to provide leadership on the matter.

I would be grateful if in your reply you would outline what consideration the Foreign Office is giving to these issues and how they might respectively be progressed to achieve maximum impact. I would be grateful for your reply by 25 August which I intend to place in the public domain and use to inform the Committee's discussion with you after the summer recess.

**TOM TUGENDHAT MP**