

# Information Circular

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**General Distribution**

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## Communication from the Permanent Mission of the Islamic Republic of Iran to the Agency

1. On 16 May 2025, the Secretariat received a Note Verbale, together with an attachment, from the Permanent Mission of the Islamic Republic of Iran to the Agency.
2. As requested, the Note Verbale and its attachment are herewith circulated for the information of all Member States.



PERMANENT MISSION  
OF THE ISLAMIC REPUBLIC OF IRAN  
TO THE UNITED NATIONS AND  
OTHER INTERNATIONAL ORGANIZATIONS

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جمهوری اسلامی ایران  
نماینده‌ی دائمی نزد دفتر ملل متحد و سازمانهای بین‌المللی  
وین

*In the Name of God, the Most Compassionate, the Most Merciful*

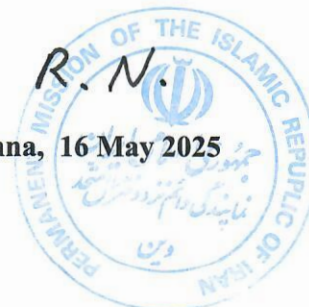
No. 2493103

The Permanent Mission of the Islamic Republic of Iran to the United Nations Office and other International Organizations in Vienna presents its compliments to the Secretariat of the International Atomic Energy Agency (IAEA) and has the honor to hereby enclose an Explanatory Note regarding the Iran-related Paragraphs of the Report by Director General on “*The Safeguards Implementation Report for 2024*” (GOV/2025/22 - 6 May 2025) and would like to request the latter to publish the Explanatory Note as an INFCIRC document.

The Permanent Mission of the Islamic Republic of Iran to the United Nations Office and other International Organizations in Vienna avails itself of this opportunity to renew to the Secretariat of the International Atomic Energy Agency the assurances of its highest consideration.

Vienna, 16 May 2025

To: The Secretariat of the International Atomic Energy Agency (IAEA)





Permanent Mission of the Islamic Republic of Iran  
to the United Nations Office and other International Organizations in Vienna

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### **Explanatory Note**

on the Iran-related Paragraphs of the Safeguards Implementation Report – SIR 2024  
(GOV/2025/22 - 6 May 2025)

Permanent Mission of the Islamic Republic of Iran to the United Nations Office and other International Organizations in Vienna takes note of the Director-General's report to the Board of Governors dated 6 May 2025 on Safeguards Implementation Report (SIR) for 2024, and would like to share its comments and clarifications on the sections pertaining to Iran's peaceful nuclear program, as well as the overall status of Iran-IAEA cooperation, as follows:

#### **General Comments**

1. The Islamic Republic of Iran accentuates the Director General's argument as to the cooperative nature of the Agency's work and the critical importance of this cooperation for effective and efficient nuclear safeguards, and reiterates its principled position under Article IV of the Non-Proliferation Treaty (NPT) regarding the inalienable right of State Parties for the enjoyment of peaceful nuclear energy without any discrimination whatsoever.
2. It is regrettable that the language of the report reflects a departure from impartial technical assessment and increasingly adopts politically charged terminologies. The SIR's reference to Iran's safeguards situation as one of "serious concern" lacks proportion, to say the least, and does not reflect either technical nature of ongoing Iran-IAEA interactions or the broader political context, including external pressures exerted on Iran's peaceful nuclear program.

#### **Enrichment Activities and Significant Quantities (SQs)**

3. Iran acknowledges the Agency's technical note regarding the accumulation of enriched uranium. However, Iran reiterates that all enrichment activities are being

conducted within the framework of its rights under Article IV of the NPT. The fuel cycle activities including enrichment as a part of national policies of Member States has been recognized by the NPT Review Conferences and other relevant bodies. While, there has been no limitation on the enrichment level based on the Comprehensive Safeguards Agreement (CSA), current uranium enrichment activities is required for Iran's present and future needs (including naval propulsion, radioisotope production, etc.).

4. The reference to “3.9 Significant Quantities” must be viewed, first and foremost, as a statistical and not a legal benchmark, and secondly, it must be viewed and interpreted within the broader SQ context of the report, which places the overall SQs at 235,939 under safeguards. Iran is roughly in possession of 0.0016% of the current SQs. Iran emphasizes that the possession of enriched material, irrespective of the amount, does not imply deviation from peaceful purposes, and as was the case with Iran during 2024, no diversion was recorded. Moreover, application of SQs to possibly contest the peaceful nature of activities in Iran is an irresponsible misapplication of a verification metric and undermines the credibility of the IAEA's technical safeguards system. Such arbitrary linkage, as implicitly delineated in the report is inconsistent with IAEA's technical and impartial role, and goes beyond the framework of mandate bestowed upon the Director General.

### **Inspector Access and Designation**

5. As the Director General rightly states in the introduction to the report, the nature of safeguards verification is cooperative in nature. In terms of CDFVs, the inspection and verification activities in safeguards implementation in the Islamic Republic is more intensified than any other country. This cannot occur in the absence of a high level of cooperation rendered by Iran to the Agency.

6. Meanwhile, Iran recalls its sovereign right to object to the designation of specific inspectors. Non-acceptance or designation withdrawal should in no way be interpreted as obstruction. As also reflected in the report of Director General to the Board of Governors, such right is “*formally permitted by the NPT Safeguards Agreement*”, and have been exercised with due notice and justification, consistent with Paragraph 9 of Iran's Safeguards Agreement (INFCIRC/214). Iran has repeatedly indicated its readiness to consult with the Agency to ensure the continuity of verification while exercising its sovereign prerogatives.

7. The claim that these objections have significantly impaired verification efforts is unsubstantiated. Iran continues to permit vast inspections at its nuclear facilities. As it has been clearly reflected in the SIR 2024, the total number of inspections for States

like Iran with CSAs in force but without Additional Protocol in place were 682, of which 493 inspections were carried out only in Iran.

### **Continuity of Knowledge, Joint Statement, Modified Code 3.1, and Discrepancy**

8. In light of further cooperation with the Agency, Iran has implemented voluntary measures in the framework of several Joint Statements, including the 4 March 2023 Joint Statement. Iran's cooperation with the Agency in the light of the Joint Statement should have been referred properly in the report, as it enabled the Agency to pursue some of the agreed activities. Two important elements of the 4 March 2023 Joint Statement should be taken into considerations, *i.e.* the framework of the CSA and the agreed modality. The Islamic Republic of Iran acting in good faith and prior to conclusion of the modalities, allowed the Agency to install 9 surveillance cameras. Furthermore, Iran allowed the Secretariat to successfully service the 4 cameras and store the recorded data. Obviously, further implementation of the Joint Statement requires Iran and the Agency to agree upon the modalities.

9. Acceptance of implementation of Modified Code 3.1 was among the measures reflected in the JCPOA. Following the U.S. unlawful and unilateral withdrawal and failure of the E3/EU to fulfill their commitments under the Agreement and a year of patience, Iran in accordance with the law entitled "*Strategic Action Plan to Lift Sanctions and Protect Iranian Nation's Interests*" passed by the Parliament, ceased the implementation of the Modified Code 3.1, in exercising its rights under paras 26 and 36 of the JCPOA. However, acting in good faith and in light of understanding reached with the Director General, Iran provided general information on planning of new facilities and has stated that relevant safeguards information will be provided to the Agency in due time. It should also be noted that the removed C/S equipment, based on the aforementioned law, were not related to the Agency's safeguards activities and did not affect at all its relevant monitoring and surveillance performance; and therefore, should have not been mentioned in the SIR report.

10. The Agency in its 90(a) Statement dated 2024.02.21 stipulated that the discrepancy in the amount of uranium contained in the solid waste sent from JHL to UCF has been resolved. This resolution has also been reflected exactly as "resolved" in footnote 23 of the JCPOA report (GOV/2024/7 dated 26 February 2024). However, without providing any reason, at the same day, the word "*resolved*" was surprisingly replaced with "*rectified*" (para. 15 of GOV/2024/8). Subsequently, the reports were unprofessionally and with no corrigendum, re-issued on the 2 March 2024. There is no justifiable reason for such unwarranted deviation of agreement and hastily amending the distributed

reports. This practice indicates external political pressures which undermines the credibility of the Agency.

### **Expenditure and Resource Allocation**

11. The very fact of allocation of a significant portion of the budget for monitoring and verification of Iran's peaceful nuclear activities, comparing to the allocated amounts for the rest of the countries, is a clear indication of the Agency's extensive monitoring activities in Iran and a clear sign of Iran's extensive cooperation and willingness in making its peaceful activities even more transparent.

### **Conclusion**

12. The Islamic Republic of Iran reiterates that the only sustainable path forward lies in technical dialogue free from politicization. The Safeguards Implementation Report's arbitrary framings -such as "loss of continuity of knowledge" or "failure to provide credible explanations"-must be weighed against Iran's concrete record of cooperation, transparency, and continued implementation of its Comprehensive Safeguards Agreement.

13. The so-called "impasse" mentioned in the report could be regarded as a self-inflicted impasse which has been created as a result of giving undue validity to the fabricated and unauthentic information while repeatedly disregarding Iran's technical explanations.

14. Iran notes with concern the growing use of subjective and biased language that aligns with political pressure campaign rather than objective reporting. Safeguards assessments must remain technical, not speculative. What has been technically and legally established, must not be challenged by politically charged statements and expressions of "serious concern".

15. Besides, mentioning matters related to the JCPOA in the safeguards report is both irrelevant and misleading. This mixing up of the reporting constitutes a perilous precedent which risks deviating the Agency from its expected professional impartiality, and as such is highly objectionable. Furthermore, making reference to the Joint Statement, which is a voluntary arrangement, has no relevance to the implementation of safeguards. The Agency is expected not to include it in the safeguards report.

16. It needs to be highlighted that throughout 2024, Iran has provided detailed explanations in response to the issues raised in the Director General's four quarterly reports in the form of Explanatory Notes on each of the aforementioned issues.

**Final Remarks**

The Islamic republic of Iran remains committed to the peaceful use of nuclear energy and continues to honor its obligations under the NPT. While political disputes must be addressed through appropriate diplomatic channels, Iran urges the Agency to return to a strictly technical posture in its reporting, assessments and communications. Iran reiterates its willingness to continue engagement with the Agency to address any outstanding technical issues arising from its safeguards obligations and reiterates that impartiality, confidentiality, professionalism and balance are essential elements to the credibility of the IAEA performance and the success of the safeguards system.