

One Year to Implementation of the JCPOA: Assessing the Nuclear Deal in Context

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Any assessment of the JCPOA in the year after “Implementation Day” (mid-January 2016) must consider a full range of variables that together comprise the relevant context.

At the core of the assessment is the question of Iran’s compliance with the terms of the deal. While the initial IAEA reports after Implementation Day found Iran to have upheld its obligations, the latest report from early November 2016 contains information that challenges this assessment. For the second time Iran was found to have exceeded the heavy water storage limit (130 metric tonnes), and for two weeks continued to produce heavy water after having been alerted by the IAEA. In addition, the IAEA report lacks information whether the Agency visited military facilities (in line with the Additional Protocol), to seek answers to questions regarding possible military work – it is not clear whether access was requested and denied, or not requested. Another worrying finding regards one of the advanced centrifuges – IR-6 – that Iran is operating in a manner inconsistent with the terms of the JCPOA.¹ Moreover, the significance of the IAEA reports cannot be properly assessed if divorced from additional information, such as that the deal required only concessions from Iran that did not undermine (and only somewhat postponed) its breakout capability; that it was clear to Iran that it must adhere to these concessions in order to obtain major and sorely-needed sanctions relief; and that the deal itself left Iran ample room

to move forward with problematic activities, such as work on advanced generations of centrifuges.

Also important to note is that all of the IAEA public reports that have been released since Implementation Day and pronounced as compliance are missing key information critical for independent verification of this conclusion, undermining the transparency principle that has long existed and been hailed by the P5+1 per this deal. Information has also come to light from German intelligence that Iran made illicit attempts over the course of 2015 to procure materials and technologies that violate the procurement channel set up by the JCPOA, and would thus not be under the direct purview of the IAEA.

Finally, an evaluation of the nuclear deal must look beyond the limited scope of the JCPOA as such – namely, the fissile materials production part of the nuclear weapons development project – and analyze Iran’s conduct more generally. While not part of the deal itself, the question of Iran’s behavior and its unfolding interactions with the P5+1 – especially with the US – is nevertheless central to the evaluation, because the long term implications of the deal hinge critically on whether positive changes occur in Iranian policies and rhetoric. It was the Obama administration that in 2015 emphasized its hope and grounds for expecting Iranian moderation following conclusion of the JCPOA as an important reason for lending it support.² As such, an evaluation of the nuclear deal must include an assessment of Iran’s activities in the Middle East over the past year, the attitude the regime has displayed toward the US and toward the JCPOA restrictions it faces, and Iran’s continued attempts to advance its nuclear program, including in the missile realm that is covered by UN Security Council Resolution 2231 but not by the deal itself.

Has Iran demonstrated its intent to turn away from its nefarious nuclear activities and plans for the future, or is it still on the path to retain a military nuclear option? Is it inclined to embrace cooperation with the international community and a return to the terms of the NPT as its new strategic interest, or is it practicing ongoing defiance? If a one-year assessment following the implementation of the deal shows that there has been no significant change in Iran’s behavior, or even a worsening of the situation in some areas, then the implications of the activities that will be enabled already in year 11 of the JCPOA are of even greater concern.

Assessment of Iran's Nuclear Activities and Capabilities

The Uranium Enrichment Route

While the declared stocks of slightly enriched uranium (to the level of less than 4 percent) have dwindled over the past year to almost negligible levels, Iran's potential for enrichment to higher levels is steadily increasing, due to its permitted development of advanced generations of centrifuges with a significantly increased enrichment capability. When the restrictions of the JCPOA are lifted, Iran will be able to install and operate these new centrifuges, significantly shortening its breakout time, and leaving the world with few options to counter this reality.

In December 2015 Ali Larijani, speaker of the Iranian Parliament, noted that Iran will gain access to technology to upgrade its centrifuges, and that the quality of centrifuges is more important than their quantity. Moreover, in January 2016 Iran presented its new centrifuges (IR-8) that are 15 times more efficient than the IR-1 models currently in use.³ Clearly Iran is working to develop these centrifuges – and ultimately test them. In addition, a report in the Associated Press from mid-July 2016 injected into the debate a previously undisclosed understanding between the P5+1 and Iran (via the IAEA) whereby from year 11 of the deal, Iran plans to install and operate several thousands of new generation centrifuges.⁴ On the basis of this information, the Institute for Science and International Security revised its assessment regarding Iran's breakout time: from year 13, the ISIS assesses that breakout time drops to four months.⁵

Furthermore, Iran holds ample stocks of low enriched uranium in the form of the fresh fuel for the Bushehr nuclear power reactor. Should Iran decide to use this fuel, despite restrictions imposed by the Russian vendor, it would need to convert the fuel into a form suitable for further enrichment, but this is not a very complex chemical process.

The Plutonium Production Route

The plutonium production route in Iran has always been a long term track, its mainstay being the IR-40 nuclear reactor under construction at Arak, which for all practical purposes was scrapped and will be replaced by a reactor with lower potential for producing plutonium. The reprocessing plant, an

important component for this route, is still missing, and the overall timetable for the plutonium route is measurable in years and not an immediate threat.

However, there is significant potential in Iran for the production of plutonium – such as the spent fuel of the Bushehr nuclear power plant, stored in Iran prior to its return to Russia. Some of this fuel contains military grade plutonium, which would still need to pass through a reprocessing plant, separating the plutonium from the other components of the spent fuel. The abrogation of Iran’s obligation to return the spent fuel to Russia is not an impossible scenario, although it would carry consequences, and Iran would have to weigh the cost against the benefit.

The Explosive Mechanism

That Iran was working on the development of the nuclear explosive mechanism, an essential component of a nuclear weapons delivery system, is a fact confirmed by the IAEA report on the Possible Military Dimensions (PMD) issued in early December 2015. Iran also had a Pakistani working design of the explosive mechanism. This activity does not fall under the terms of the JCPOA, and the verification mechanism in the JCPOA for dealing with the possibility that Iran might continue with this effort – at a military facility – is not adequate, as explained below.

Delivery Systems

Iran has an intensive and extensive missile development program and tests its long range ballistic missiles continuously. Iran reportedly stepped up its missile activities in 2015-2016, and the tests that it conducted in October-November 2015 included a new precision guided missile – the domestically made Imad surface-to-surface missile – that has a range of 1700 km and an accuracy of 500 meters, and is capable of carrying a nuclear payload. In December 2015, President Hassan Rouhani ordered stepped-up missile production in Iran in response to America’s intent to sanction it for the precision guided missile test. The ranges of Iran’s missiles are diverse, from very short distances to thousands of kilometers. Since Iran’s missile program is not covered by the JCPOA, and Iran is ignoring the relevant Security Council resolutions (Resolution 1929 until January 2016, and 2231 thereafter), long range missiles pose a significant threat to Iran’s neighbors and to standoff targets such as Israel and parts of Europe.

Verification

The JCPOA verification mechanism is limited mainly to declared nuclear sites and fissile materials production-related activities. It cannot independently search for undeclared facilities and materials, and cannot inspect explosive mechanisms development activities. For these activities, it must rely on the intelligence provided by states. Moreover, the JCPOA provisions for inspecting a suspicious military site are lengthy and complicated, and the upshot is the lack of a clear and unambiguous path for gaining timely access to a suspicious site in Iran. Iran has clarified repeatedly since the JCPOA was announced (and well before that time) that it will never allow IAEA inspectors access to a military facility,⁶ and the Parchin inspection of summer 2015 – when IAEA inspectors did not gain entrance into the facility – created a bad precedent in this regard. In June 2016 it was revealed that US officials concluded that uranium particles found at the inspection in 2015 were related to Iran’s weaponization program. But the terms of the JCPOA also prohibit the IAEA from inspecting Parchin again; they were allowed a one-time inspection at that facility.⁷

Procurement Channel

The procurement channel described in the JCPOA came into sharper focus in early July 2016 in the wake of media reports highlighting findings by a German domestic intelligence agency that revealed over a hundred attempts on the part of Iran to illegally procure missile and nuclear components and technology, some of which could be used in the context of a nuclear weapons program.⁸

Assessment

What emerges from this review of Iran’s nuclear activities and capabilities is that after a decade, Iran will begin to regain full enrichment potential, incorporating all activities permitted by the JCPOA, and replace its obsolete IR-1 gas centrifuge machines with the new and more efficient models. Moreover, Iran will have perfected the design of an explosive mechanism, and will have a working nuclear warhead design, mountable on advanced missile systems.

The Political Context

The question of the relevance of Iran's behavior outside the nuclear realm to the success of the deal itself has been an issue of considerable debate from the initial stage of negotiations with Iran, which began in 2003. While the danger associated with nuclear weapons is very much a function of the goals and policies of the states that hold them, the question was whether the international community should attempt to negotiate a grand bargain with Iran that related to both nuclear and regional issues, or whether focus should be exclusively on the nuclear issue, with the singular purpose of returning Iran to the fold of the NPT. The choice was made early on to focus on the nuclear issue in particular, and once President Obama took the helm in 2009, the "nuclear first" approach was cemented further. The logic was that a broader negotiation might be too difficult to bring to successful resolution, with the end result being that neither the nuclear issue nor Iran's overall regional policies (especially its support for terrorism and insurgency in key areas across the Middle East) would be curbed.

The logic of the approach was grounded in the assumption that the nuclear issue would be resolved, comprehensively and definitively. However, the JCPOA has not provided a full solution to the Iran nuclear crisis, as per the originally stated goal of the US and P5+1. Rather, the nuclear deal succeeded only in pushing back the time to breakout (from several months to a year), and only for a period of 10-15 years. With this watered-down goal, other facets of Iran's behavior have remained a source of concern, as underscored by Obama's own attempt over the summer of 2015 to link the emerging deal to prospects for moderation in Iran. In other words, with a less than comprehensive deal, the long term prospects for success of the JCPOA intentions became closely linked to a change in Iran's behavior as well, in the direction of cooperation with the international community and departure from aggressive designs for the Middle East.

When looking back over the past year, Iran's overall profile is thus highly relevant to an assessment of the deal, with a number of areas comprising the relevant political context – in particular, Iran's policies in the Middle East, and its attitudes toward the US. Regarding the region, the past year has seen a stepped up Iranian presence in Syria in support of the Assad regime, and an attempt to intervene on behalf of Shiites in Yemen and

Iraq. Iran's ballistic missile tests over the course of 2015-2016 were a clear provocation, with Iran stating repeatedly that it would tolerate no outside interference. But the tests of October and November 2015 were a violation of UN Security Council Resolution (UNSCR) 1929 that was still in effect at the time, and the tests since then are a demonstration of Iran's intent to increase its missile capabilities while threatening its neighbors, especially Israel, as expressed in the Hebrew writing on some of the missiles that they intend to destroy Israel. After UNSCR 2231 replaced 1929 on the missile front, holding Iran to its terms has become more difficult because of the changed language. At Iran's insistence, the new resolution merely calls on Iran to refrain from working on missiles, but does not prohibit this activity; moreover, it refers to missiles *designed to* carry a nuclear warhead, rather than missiles that are simply capable of carrying such a payload. Because Iran denies any intention of working on nuclear weapons, it claims that no missile that it develops could possibly violate the terms of Resolution 2231. Iran's defiance in the missile realm also finds expression in its rhetoric, as it threatens to respond to any US attempt to sanction it for its violations.⁹

Furthermore, a string of Iranian statements over the past year has underscored not only Iran's lack of interest in changing the level and nature of interaction with the United States, but its ongoing fiery attitude toward it as well.¹⁰ Since early 2016 Iran has referred to itself as the cooperative party – the one that has implemented its obligations in a serious manner – while accusing the US of lack of compliance with its economic obligations, thereby undercutting the deal. This message has been delivered by all the prominent voices in Iran: Supreme Leader Ali Khamenei, along with Rouhani, and Minister of Foreign Affairs Mohammad Javad Zarif.¹¹ Moreover, Iran has clarified that its program can be quickly unfrozen in the face of what it views as non-compliance by the other side.¹²

While many would like to believe that the JCPOA has resolved the Iranian nuclear crisis, developments over the past year underscore that the US-Iran arm wrestle continues, at least as far as Iran is concerned. Iran's actions in the missile realm, its illicit procurement efforts, and its defiant rhetoric on nuclear and regional issues send a message to the US that not only is Iran not interested in cooperation with the US, but it does not intend to accept instructions from America as far as what it can and cannot do in the security

realm. Moreover, Iran has learned that when it threatens to leave the deal, the P5+1 listen and try to accommodate,¹³ which translates into leverage for Iran in the ongoing struggle. Even on the one-year anniversary of the deal in July 2016, Iran continued to accuse the US of “lackluster” compliance, and Rouhani warned that Iran could leave the deal if the P5+1 do not live up to their obligations.¹⁴ With Iran projecting an image of strength and a sense that it is emboldened in the post-deal period because the other side is wary of upsetting Iran, and by extension, the deal itself, there is a question of who has gained the upper hand in this relationship.¹⁵

Much of the above analysis of the post-deal reality has focused on relations between Iran and the US, given our assessment that the US has emerged as the key P5+1 party in the unfolding post-deal reality. Indeed, it is difficult to estimate where the other partners stand on the deal, because they have made few statements and seem to have moved on. From the day the deal was announced in July 2015, the only serious political debate that took place over the terms and implications of the deal was in the United States. European states immediately began looking for economic opportunities in Iran, while Russia prepared to advance its full range of interests in the Middle East, some of which include Iran, without mention of the nuclear issue.

Recommendations for Israel

It took Iran almost twelve years to reach the point where it realized that it was in its interest to conclude a deal with the P5+1. Against that backdrop, the fact that Iran has formally committed itself to implement the deal does not mean that Iran will uphold the agreement to the letter (let alone the spirit), including the specified timelines, if it assesses that it is no longer in its interest to do so. If and when that happens is in Iran’s hands. What that means is that Israel – and all who are concerned about the future of Iran’s nuclear program – should focus its efforts/preparations on the worst-case scenarios in terms of a possible Iranian violation of the deal, or Iran’s termination of the deal long before the sunset provision kicks in.

Central to Israel’s preparedness for any eventuality is a comprehensive understanding with the US administration, in the form of a written agreement that will cover both the period until the deal expires, as well as the period thereafter.

Numerous recommendations have been offered regarding the areas and content of cooperation between Israel and the US, both before and after the deal expires.¹⁶ First and foremost is enhancing intelligence capabilities to monitor Iranian compliance, or lack thereof, and to define what constitutes a violation and proper response. The two countries should not wait for the post-sunset period (i.e., after 10-15 years) in order to begin; if they wait to agree on an action plan after most of the restrictions are removed, Iran will be able to resume a full scale nuclear industrial program. The goal of the plan should be to do whatever is necessary in order to prevent Iran from producing a military nuclear capability.

As essential as the coordination and cooperation with the US is, Israel should complement these efforts (in coordination with the US) by reaching out to the other members of the P5+1. Wherever possible, Israel should strive to share intelligence and maintain a continuous dialogue regarding Iran's nuclear program. Given the multitude of crises facing the international community these days – and the noticeable tendency now that a deal has been achieved and an immediate crisis averted to put the Iranian nuclear issue on the back burner – Israel should strive to maintain international awareness of the Iranian nuclear issue, through traditional means of diplomacy. It should be clear that in the case of an Iranian violation, or in the post-sunset period if Iran decides to resume its nuclear program, Israel will not be able to fix the problem on its own – not militarily, let alone if sanctions must be re-imposed.

The fear in the region of the all-encompassing Iranian threat, and the sense among the so-called pro-Western states such as Saudi Arabia and some of the Gulf countries of the declining US interest in the region, has led them to turn to Israel as a partner in their efforts to contain and deter the Iranian nuclear threat as well as other regional threats. Israel would do well to seize the opportunity created by the new regional circumstances, and engage those Arab states in a comprehensive agenda, which in addition to discussion of ways to confront Iran's aspirations (through intelligence and diplomacy) should broaden the agenda with the view of transforming the region. The price for the willingness of the Arab states to form an open alliance, as opposed to more discreet cooperation, is likely to be progress toward resolving the Israeli-Palestinian conflict.

As to the home front, even though since the deal was announced the issue has lost its prominence (at least in the Israeli media), Israel – with US assistance – should continue to improve its capabilities to defend itself against ballistic missile and other threats emanating from Iran (and not only from Iran).

It is too early to tell whether the deal will eventually serve as an impetus for other countries to embark on their own nuclear programs, following in the footsteps of Iran. To avert the latter scenario, Israel should be part of an international coalition whose objective should be to stem the proliferation of nonconventional capabilities.¹⁷

Concluding Remarks

The reality of Iran having in the main upheld the terms of the deal in the first year since implementation is not surprising. If Iran was only required to carry out minimal concessions, necessary to attain essential sanctions relief, but at the same time indicated its intent to continue developing its nuclear program – then short term compliance is neither a surprise, nor is it a reason for complacency. And even with these minimal concessions, the latest IAEA report indicates that Iran is not fully cooperating with the Agency, especially regarding the IAEA's ongoing attempt to ensure that there is no military nuclear work that continues in Iran.

One year ago critics of the deal were generally not arguing – if at all – that Iran would violate the deal in the short term; their point was rather that it could. Many pointed out that Iran actually has a strong short term interest in adhering to the terms in order to get the full economic benefits of the deal. A major focus of attention of the critics went to the most dangerous element of the deal: the sunset provision, whereby all technical restrictions will be lifted in 10-15 years. The concern here is that the deal will be terminated when Iran has a vastly more advanced nuclear program – including thousands of operational advanced models of centrifuges. The most dangerous scenario noted by those with serious reservations about the deal shows Iran waiting out the 10-15 year period of restrictions, and then moving forward when it is no longer an object of international attention. At that time, Iran's program and nuclear threshold status will not only no longer be under P5+1 fire, but indeed will have been fully legitimized by these states – and all of this

will happen regardless of whether there is any change in Iran's aggressive positions, activities, and rhetoric.

As it stands, the JCPOA gives Iran room to improve its existing nuclear capabilities, which will enable it to proceed if not in the actual production of nuclear weapons then in the significant reduction of its breakout time when the JCPOA begins to expire, at year 10. Considering Iran's past history, one cannot dismiss the possibility that it might break out sooner than that, or proceed in a well concealed program to produce a nuclear explosive device and then explode it. One cannot dismiss the possibility that Iran could seek shortcuts to nuclear weapons; although many argue that the probability for doing so is low at present, decision makers should certainly take this scenario into account, especially because one year into the JCPOA implementation, the expectation that the deal would engender moderation in Iran's overall behavior has not materialized.

Looking to the new United States administration, many questions have been raised about the future of the JCPOA, especially in light of campaign statements by the president-elect about ripping up what he views as an extremely bad deal. At this point, there seems to be a little probability of doing away with the deal, despite campaign rhetoric. Yet there are expectations for a change in the US approach, and an increased willingness to display vigilance in keeping Iran to its commitments and reacting to its other attempts to increase its power and influence in the Middle East and beyond. The international community, and the United States in particular, is capable of ensuring better implementation of the JCPOA, regarding both the provisions of the deal itself and Iran's overall behavior.¹⁸

Notes

- 1 See David Albright and Andrea Stricker, "Analysis of the IAEA's Fourth Iran Deal Report: Time of Change," ISIS Report, November 15, 2016, <http://isis-online.org/isis-reports/detail/analysis-of-the-iaeas-fourth-iran-deal-report-time-of-change>.
- 2 See Obama's official statement: "Statement by the President on Iran," July 14, 2015: "The path of violence and rigid ideology, a foreign policy based on threats to attack your neighbors or eradicate Israel – that's a dead end. A different path, one of tolerance and peaceful resolution of conflict, leads to more integration into the global economy, more engagement with the international community, and the ability of the Iranian people to prosper and thrive. *This deal offers an*

opportunity to move in a new direction. We should seize it" (emphasis added); see <https://www.whitehouse.gov/the-press-office/2015/07/14/statement-president-iran>. See also article by David Samuels based on in-depth interviews with Ben Rhodes, in which Rhodes states the intent of the administration to link the idea of moderation in Iran with prospects for the deal, as a way of selling it, "The Aspiring Novelist who Became Obama's Foreign-Policy Guru," *New York Times Magazine*, May 5, 2016, <http://www.nytimes.com/2016/05/08/magazine/the-aspiring-novelist-who-became-obamas-foreign-policy-guru.html>. This article sparked considerable debate in the US over the question whether the Obama administration misled the American people with regard to the deal.

- 3 "Spokesman: Iran Testing New Centrifuges," *Fars News Agency*, July 13, 2016, <http://en.farsnews.com/newstext.aspx?nn=13950423001016>.
- 4 See George Jahn, "AP Exclusive: Document Shows Less Limits on Iran Nuke Work," *AP*, July 18, 2016, <http://bigstory.ap.org/article/140ca41aba7a42cda13792f07df4b8d3/ap-exclusive-secret-document-lifts-iran-nuke-constraints>. See also Yaakov Lappin, "Senior Arms Expert: Report on Secret Iran Deal Document Underlines Very Serious Problem," *Jerusalem Post*, July 20, 2016, <http://www.inss.org.il/uploadImages/systemFiles/Senior%20arms%20expert%20-%20Emily%20-%20JP%20-%20site.pdf>.
- 5 See Institute for Science and International Security, "Iran's Long-Term Centrifuge Enrichment Plan: Proving Needed Transparency," August 2, 2016, http://isis-online.org/uploads/isis-reports/documents/Irans_Long_Term_Enrichment_Plan_Breakout_2Aug2016_Final.pdf.
- 6 See for example "As Talks Resume, Iran Vows no Inspection of Military Sites," *Times of Israel*, May 20, 2015, <http://www.timesofisrael.com/as-talks-resume-iran-vows-no-inspection-of-military-sites/>; and Paul Richter, "Iran Can Deny Access to Military Sites, Foreign Minister Says," *Los Angeles Times*, July 23, 2015, <http://touch.latimes.com/#section/-1/article/p2p-84052520/>.
- 7 For the report itself see Jay Solomon, "Uranium Provides New Clue on Iran's Past Nuclear Arms Work," *Wall Street Journal*, June 19, 2016. <http://www.wsj.com/articles/uranium-provides-new-clue-on-irans-past-nuclear-arms-work-1466380760>. For the problematic implications of not being able to revisit Parchin, see Olli Heinonen, "Uranium Particles at Parchin Indicate Possible Undeclared Iranian Nuclear Activities," *FDD Research*, July 1, 2016, <http://www.defenddemocracy.org/media-hit/olli-heinonen1-uranium-particles-at-parchin-indicate-possible-undeclared-iranian-nuclear-a/>.
- 8 Leonhard Foeger, "Germany Says Forces in Iran Trying to Torpedo Nuclear Deal," *Reuters*, July 8, 2016, <http://www.reuters.com/article/us-iran-nuclear-germany-idUSKCN0ZO1F9>. This information should be taken seriously and thoroughly

assessed by the P5+1; however, at a press conference, State Department spokesman John Kirby's responses to reporters' questions were an attempt to minimize the significance of this intelligence, rather than stating US intent to verify what could be a violation of the JCPOA. See Jack Heretik, "State Dept Questioned on Iranian Efforts to Obtain Illicit Nuclear Technology," *Washington Free Beacon*, July 8, 2016, <http://freebeacon.com/national-security/state-dept-struggles-answer-questions-iran-nuclear/>.

- 9 See "Iran Vows to Pursue Ballistic Missile Program despite New US-imposed Sanctions," *ABC News*, March 28, 2016, <http://www.abc.net.au/news/2016-03-29/iran-vows-to-pursue-missile-program-despite-new-us-sanctions/7280120>.
- 10 For a representative statement expressing lack of interest in any communication, not to mention cooperation with the US beyond the JCPOA, see the Iranian Foreign Ministry spokesman reacting to CIA director John Brennan's comments on US-Iranian ongoing conversations, and his expressed hope for increased cooperation: "No Iran-US Negotiations Other than on Nuclear Issue: Qasemi," *Press TV*, August 1, 2016. Qasemi also rejected Brennan's attempt to draw a line between hardliners and moderates in Iran, emphasizing the unity that exists. See <http://www.presstv.ir/Detail/2016/08/01/477971/Iran-US-CIA-Bahram-Qasemi-John-Brennan>.
- 11 For one of many examples, see "US Losses Outweigh Gains in JCPOA Breaches: Iran FM," *Press TV*, August 7, 2016, <http://presstv.com/Detail/2016/08/07/478946/Iran-US-Mohammad-Javad-Zarif-JCPOA-Baku>.
- 12 The spokesman of the Atomic Energy Organization of Iran has been quoted as saying that Iran can restart its frozen program if the other side does not uphold its commitments, and the world would be surprised at how fast that can happen. See "Spokesman: Iran Testing New Centrifuges."
- 13 When these Iranian complaints surfaced in May 2016, US Secretary of State Kerry traveled to Europe in order to reassure banks and companies that they can go back to business with Iran. See for example Reuters, "US's Kerry Seeks to Reassure European Banks on Iran Trade," *CNBC*, May 12, 2016, <http://www.cnb.com/2016/05/12/uss-kerry-seeks-to-reassure-european-banks-on-iran-trade.html>; and Carol E. Lee and Jay Solomon, "U.S. Seeks to Use Business to Lock in Iran Deal," *Wall Street Journal*, June 23, 2016, <http://www.wsj.com/articles/u-s-encourages-firms-to-make-deals-with-iran-in-bid-to-cement-nuclear-deal-1466727183>.
- 14 See David Francis, "Iran Accuses U.S. of 'Lackluster' Implementation of Nuclear Deal," *Foreign Policy*, July 14, 2016, <http://foreignpolicy.com/2016/07/14/iran-accuses-u-s-of-lackluster-implementation-of-nuclear-deal/>.
- 15 See in this regard also statements by Speaker Larijani demanding that Iran reopen enrichment facilities in response to a UN report on Iran's activities in the missile realm: Rick Moran, "Iran Plans to Reopen Closed Nuclear Sites in Violation of

Nuclear Agreement,” *American Thinker*, July 22, 2016, http://www.americanthinker.com/blog/2016/07/iran_plans_to_reopen_closed_nuclear_sites_in_violation_of_nuclear_agreement.html.

- 16 See Amos Yadlin, “Following the Problematic Nuclear Agreement: Scenarios and Policy Recommendations,” *INSS Insight* No. 722, July 20, 2015, <http://www.inss.org.il/uploadImages/systemFiles/No.%20722%20-%20Amos%20for%20web248853023.pdf>; and Emily B. Landau and Shimon Stein, “To Prevent Another Iran Disaster, Fix Nuclear Enforcement,” *National Interest*, June 8, 2016. <http://nationalinterest.org/feature/prevent-another-iran-disaster-fix-nuclear-enforcement-16516>.
- 17 See Landau and Stein, “To Prevent Another Iran Disaster, Fix Nuclear Enforcement.”
- 18 See Ephraim Asculai and Emily B. Landau, “Repairing the Iran Nuclear Deal’s Damage,” *Times of Israel*, November 15, 2016. <http://www.timesofisrael.com/repairing-the-iran-nuclear-deals-damage/>.