# Putting the Revolutionary Guard on the EU List of Terrorist Organizations

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A singular convergence of circumstances increases the possibility that the United Kingdom and the European Union might consider designating the Islamic Revolutionary Guard Corps as a terrorist organization. Such a step would have considerable symbolic significance and practical implications for Iran's ability to carry out terrorist attacks in Europe and the UK, as well as for the ability of the EU and the UK to prevent such attacks. However, such a step also carries potential risks, chiefly, a harsh Iranian response that harms European and British interests. Israel should exploit the strategic opportunity that has emerged and encourage the EU and the UK to change their policy toward Iranian terrorism, while emphasizing the advantages inherent in such a step and presenting ways of coping with the associated risks.

Keywords: Iran, European Union, United Kingdom, Islamic Revolutionary Guard Corps (IRGC), Quds Force, terrorist organizations

### Introduction

The past year has seen increasing calls in Europe and the United Kingdom to designate the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organization. This trend stems from a singular convergence of circumstances and events across the world, including Iran's increasing involvement in terrorist activities on European soil, as well as in the UK. In addition, the organization is involved in encouraging Islamic radicalization and domestic terrorism in Europe. Among other reasons that could prompt a change in Europe's approach toward Iran are the Woman, Life, Freedom protests in Iran and the violent way that the Iranian authorities, using the Revolutionary Guard, suppressed them, as well as Iran's involvement and support of Russia in the Russia-Ukraine war, contrary to European interests. Iran's longstanding support for Hamas and the charges of its involvement (to varying degrees, according to different reports) in Hamas's murderous attack on southern Israel on October 7, 2023 have also contributed to this trend. All these developments have created a certain change in the European approach toward Iran, and as a result, an increased willingness by the European Union and the UK to consider the possibility of placing the IRGC on the list of terrorist organizations.

As part of this increased willingness, in January 2023 the European Parliament voted overwhelmingly in favor of a decision calling on the EU to place the IRGC on the list of terrorist organizations. However, at a meeting in Brussels a few days after the vote, EU foreign ministers

chose to add specific names to the list of people sanctioned, instead of adding the IRGC to the list of terrorist organizations. Likewise, in January 2023, the British House of Commons voted unanimously in favor of a decision calling on the British government to include the IRGC on the list of terrorist organizations. Even though this decision is not legally binding, it reflects the sentiment of UK citizens through their parliamentary representatives. Moreover, both the British Home Secretary and the British Defence Secretary expressed support for placing the IRGC on the list. In contrast, it seems that the British Foreign Office opposes this step, both due to the fact that this is expected to negatively affect Iran-UK relations and due to its view that the current sanctions imposed on the IRGC are sufficient. In July 2023, the British Foreign Secretary announced that the UK would not designate the IRGC as a terrorist organization, and instead, the criteria for imposing sanctions on supporters of the organization and on companies that maintain relations with it were expanded.

Thus, there is potential for change in British and European policy toward the IRGC, although there are still many difficulties on the road to its realization. This article begins by presenting the Revolutionary Guard's involvement in terrorism. It then surveys the main ramifications expected from putting the IRGC on the list of terrorist organizations and the benefit inherent in this step for the fight against terrorism and prevention of terrorist activity. Next, it presents the main arguments and political considerations against this step. The article concludes with recommendations for Israel in the situation that has emerged.

## The Revolutionary Guard's Involvement in Terrorism

The Revolutionary Guard was established in 1980 by Ayatollah Ruhollah Khomeini a short time after his arrival in Iran and the establishment of the Islamic Republic. Several objectives were defined for the organization, led by protection

of the revolution's ideology; maintenance of internal security in Iran; and prevention of a coup. In addition, the organization was intended to be a counterweight to the standing army, although it was tasked with operating in coordination and cooperation with it. It was also entrusted with exporting the Iranian revolution to the world. In this sense, the organization serves as a protector of the revolution, and it sees its actions as aiming to fulfill this strategic objective while using a broad range of means, one of them being terrorism.

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During the four decades since its establishment, and especially due to its important role in the Iran-Iraq War, the organization expanded in terms of both manpower and weapons, and today it is the main military organization in the country; it receives priority in resources and is responsible for all sensitive projects. The organization has many branches, including a navy, air force, and intelligence, as well as the Quds Force, which is the Iranian armed force for external affairs and what in practice maintains relations with armed organizations in Afghanistan, Iraq, Lebanon, Yemen, Gaza, and elsewhere. It provides them with training, weapons, money, and military advice. In addition, the organization is responsible for the Basij, a volunteer paramilitary organization that assists with law enforcement and with handling emergency situations, provides social services, and more. As a result, and in addition to its impact in the international and regional arenas, the Revolutionary Guard is a central actor inside Iran, with much influence on political and

cultural life, as well as considerable involvement and influence in the Iranian economy.

Even though terrorism is not the Revolutionary Guard's only or primary area of activity, the organization's involvement in terrorist activity is widespread. The organization operates against a wide variety of targets, including on European and British soil, in particular through the Quds Force. One main target is Iranian expatriates and those perceived as opponents of the regime. Inter alia, the organization is responsible for kidnappings, assassinations, and threats against Iranian activists and dual nationals. This policy has existed since the organization's beginning, and actions include the assassination of three Kurdish opponents of the regime and their translator at the Mykonos restaurant in Berlin in 1992, and the assassination of an Iranian opponent of the regime in Cyprus in 1989. Examples of such activities in recent years include the 2023 execution of British journalist Alireza Akbari, who was lured by the Revolutionary Guard to return to Iran and executed there under the accusation of espionage, and the 2021 and 2022 attempts to kidnap and assassinate the Iranian-American journalist Masih Alinejad. Another example lies in the reported November 2022 attempts to harm the Iranian opposition media channel Iran International; all these join a long series of other actions. These attempts to harm Iranian opposition figures have gathered momentum recently, partly against the backdrop of the internal tension in Iran and concerns of destabilization.

Another type of terrorist activity that the organization is involved in is "classic" terrorism perpetrated against those defined as enemies of the regime. In recent years, for example, the organization has been involved in terrorist attacks, especially in attempted attacks against Israel on several continents and in many countries, such as Cyprus, Turkey, India, Colombia, and more. Along with the attacks against Israel, there are also reports of IRGC

actions against American interests, such as the information the United States revealed regarding the organization's intentions of assassinating former National Security Advisor John Bolton, former Secretary of State Mike Pompeo, and US Special Representative for Iran Brian Hook, who are now protected by the state due to these threats. The organization is also involved in acts of terrorism against Arab countries, as could be seen, for example, in the Khobar Towers bombing in Saudi Arabia in June 1996; the Iranian attempt to assassinate the Saudi ambassador to the United States in October 2011; the attack that the organization carried out in Sitra, Bahrain in 2015; and a long list of other incidents.

Alongside these two main channels of activity, the organization is involved in acts of maritime terrorism. In recent years there have been reports of Iranian actions against Israeli ships or ships connected to Israel, such as the attacks on the *Lori* and the *Helios Ray*, as well as the attack on the Zodiac shipping company's oil tanker, which was attacked by IRGC vessels and suicide drones.

In addition to the organization's direct involvement in terrorist activity, it supports a long list of terrorist organizations economically and operationally, including Hezbollah, Palestinian Islamic Jihad, Hamas, Kata'ib Hezbollah in Iraq, al-Ashtar Brigades in Bahrain, the Houthi rebels in Yemen, and additional terrorist organizations in Syria, the Persian Gulf, and the Sahel region. The organization also provides weapons to terrorist organizations, for example, drones to the Polisario in southern Algeria, and it provides assistance and undermines stability in regions such as Tigray and South Sudan. After Hamas's October 7 attack, there were reports in the international media that IRGC officers had collaborated with the organization since August 2023 in planning the attack. Even those who doubt direct Iranian involvement in planning the onslaught agree that Iran's longstanding support for Hamas, which includes armament, training, and economic support, helped the organization perpetrate the attack. This joins the involvement in the fighting in the days and weeks after the attack by other Shiite organizations supported by Iran, such as the launching of cruise missiles by the Houthis in Yemen or attacks by Shiite militias in Iraq and Syria against American bases, which were carried out with Iranian direction.

The primary perpetrator of the IRGC terrorist activity is the Quds Force, which was established in the 1990s to create a systematic organizational framework for exporting the revolution outside of Iran, and in practice became Iran's main clandestine armed force operating outside of its borders. Quds Force is responsible for most of the terrorist attacks carried out throughout Europe (and worldwide), as well as for the connection with foreign terrorist organizations, but other parts of the IRGC are also involved in terrorist activity. These include the IRGC's intelligence organization, which was responsible for the attempted attack that was thwarted in Cyprus in June 2023. The IRGC navy is likewise involved in terrorist activity, although this is not its main area of activity, as is the IRGC cyber unit.

From the Iranian perspective, these activities are warranted by the need to rebuff threats to the Iranian regime and its stability, distance the campaign from Iran's borders, and so on. This is especially true of activity against Israeli and Jewish targets, which is perceived as a response to Israel's activities against Iran and as defending against it. Nevertheless, the tactics that Iran uses—and in particular given that these actions are usually aimed at non-combatants, such as tourists and businesspeople, rather than against military figures or those involved in military programs such as the nuclear program—makes them acts of terrorism, and this is therefore a reason to consider designation of the IRGC as a terrorist organization.

## The Ramifications of Including the IRGC on the List of Terrorist Organizations

Putting an organization on the list of terrorist organizations means imposing restrictions and sanctions on the organization, and restricting the ability of companies and other elements in those countries to maintain relations with the organization. Beyond the practical aspects of putting an organization on the list of terrorist organizations, this step has considerable symbolic significance, due to the inherent message in the negative labeling of organizations on the list, and is a reflection of the country seeing the organization as illegitimate. Aside from the United States' inclusion of the IRGC on its list of terrorist organizations and Canada's inclusion of Quds Force on the corresponding list in Canada, there is no precedent for such a step, in which a military body of a sovereign state is declared a terrorist organization. The unprecedented nature of this step heightens its symbolic impact.

Indeed, the symbolic implications of putting the IRGC on the list of terrorist organizations should not be taken lightly. This is a message to the Iranian authorities that Europe will not tolerate continued Iranian involvement in terrorism inside the UK and the EU, and that it blames Iran explicitly for this involvement. Since one of the motivations for terrorism, in particular while sometimes using foreign agents, stems from the possibility of denying state responsibility for these actions—and it is evident that Iran is operating at the current time as if it has nothing to lose from its continued involvement in and initiation of terrorism on European soil—this message is of great importance. This step also carries a message for Europe's allies, including the United States, Israel, and Gulf countries that suffer from Iranian terrorism, that not only does Europe take Iranian involvement in terrorism seriously, but it is also willing to take drastic steps in face of this involvement. Finally, there is a message here for other countries that support terrorism,

which emphasizes that state involvement in terrorism will not prevent inclusion on the list of terrorist organizations and will not serve as a cover for terrorism.

At the same time, putting the IRGC on the list of terrorist organizations in the European Union and the UK would be expected to have limited practical ramifications, as extensive economic sanctions are already imposed on the IRGC for various reasons. Perhaps a certain deterrent effect could emerge due to the comprehensive nature of the measure, which would discourage major companies and banks from doing business with bodies connected to the IRGC, but given that such an effect already exists because of the sanctions, the expected impact would be very minor. Thus, it would be unlikely for there to be extensive economic consequences of putting it on the list.

Nonetheless, there could be other practical consequences, primarily along two lines. First, in both the EU and the UK, the very fact of putting the organization on the list would make membership in the organization, support for it, and aid to its activities a criminal offense. While including the IRGC on the list of terrorist organizations in the United States has not led to the filing of charges based on this clause so far, and similarly it is unlikely that this would occur in Europe and the UK, the theoretical possibility of such prosecution could reduce support for the organization among local communities, at least overtly. Second, as a result of this criminalization, placing a body on the list of terrorist organizations enables the police and judicial bodies to adopt enhanced measures with respect to criminal issues—which could help thwart terrorist attacks in earlier, preparatory stages—and grants security forces powers that they previously could not use in this respect. Given the IRGC's increased activity in Europe in general and in the UK in particular, this possibility could have practical ramifications for the fight against terrorism.

## Considerations Against Adding the IRGC to the List of Terrorist Organizations

The most important consideration against adding the IRGC to the list concerns Iran's potential response. Iran could take a wide variety of steps that range from actions with military implications for the EU and the UK, such as designating European military bases in countries neighboring Iran as terrorist bases and hostile targets, to increased military actions against European targets, attacks on European citizens inside Iranian territory, and declarative steps. Following recent developments in the European Parliament and the UK, threats were indeed made by Iranian officials regarding such measures. In addition, there is the danger of harming European countries' ability to use political means vis-à-vis Iran, which would undermine their ability to serve as mediators between Iran and the West.

Given Iran's brazenness and its existing willingness to carry out acts of terrorism in Europe (directed mainly against Jewish and Israeli targets and Iranian opposition targets), and because of its willingness to use European citizens arrested in Iran as bargaining chips, these concerns must not be taken lightly. Iran has a clear interest in maintaining good relations with the UK and the EU, in particular given the difficulties in its relations with the United States, so most of the overt steps that it would take would likely be of a more rhetorical and less practical nature, such as declaring the US Central Command (CENTCOM) a terrorist organization following the US decision to include the IRGC on the list of terrorist organizations. However, as these interests existed in recent years and did not prevent Iran from trying to carry out attacks against opposition targets and Jewish and Israeli targets in Europe and the UK, in the covert sphere Iran could strive to carry out more aggressive actions, such as the Iranian attempts to assassinate American officials. Consequently, there is concern that in response to adding the IRGC to the list of terrorist organizations, Iran would increase its activity throughout Europe and maybe even expand it to activity against European targets, instead of limiting it to actions against Jewish and Israeli targets and opposition targets.

Europe's recourse to political measures vis-à-vis Iran is also important to the Iranian regime, which ultimately is not interested in escalation in its relations with the West, in particular while it is already coping with domestic difficulties and its internal stability is challenged. However, precisely because of these very difficulties and challenges, the Iranian regime needs a common enemy around which to unite the nation, and a European decision to put the IRGC on the list of terrorist organizations would provide it with such an opportunity.

Furthermore, terrorism is a relatively marginal portion of the organization's extensive activity. Ultimately the IRGC is in fact an official organ of the Iranian state and its main role is in the military sphere, along with political-economic issues in Iran, not terrorist activity. In this sense, some would argue that putting the IRGC on the list of terrorist organizations could undermine the distinction that exists between a terrorist organization and the actions of a state military force.

The weight of this argument depends on the way one interprets the significance of inclusion on the list of terrorist organizations. If inclusion means that the entire organization is a terrorist organization, then there is no doubt that many parts of the IRGC are not involved in terrorist activity, and even if their activities are problematic for other reasons, such as involvement in state subversion, political suppression, the operation of military-strategic systems, or involvement in crime and relations with criminal organizations, these activities cannot be defined as terrorism. On the other hand, if we see inclusion as a step indicating that the organization is involved in terrorist activity, even if this is not its sole purpose, then there is much evidence that there are

parts of the IRGC, especially the Quds Force, that are undeniably involved in terrorism. Indeed, organizations that engage in terrorist activity while also engaging in political and economic activity have been included on the list of terrorist organizations. Hamas, for example, which functions as the body that rules the Gaza Strip and undoubtedly has social, political, and economic functions alongside its involvement in terrorism, is recognized by both the United States and the EU as a terrorist organization. Hezbollah, which in addition to its activity as a terrorist organization also functions as an economic, social, educational, and political body in Lebanon, was put on the list of terrorist organizations by the United States, the UK, and many countries in the EU (including Germany, the Netherlands, the Czech Republic, Lithuania, and Estonia), though not by the EU itself. Nevertheless, a non-state organization such as Hamas or Hezbollah is not the same as a central military organization of a state such as the IRGC, whose main missions do not involve terrorism, and thus the analogy is partial. One possible solution to this issue lies in the possibility of defining only the Quds Force as a terrorist organization and adding it to the list of terrorist organizations, as did Canada, for example. This step has not yet been taken by the UK and the EU, and it could be a suitable compromise that reflects both the Quds Force's considerable involvement in terrorism and the fact that this involvement does not represent the nature of the Revolutionary Guard.

Furthermore, it appears that it is Iran that is to blame for undermining the distinction between the (legitimate) actions of a state military force and terrorist activity, as it chooses to integrate both types of activity as part of its strategy for furthering its objectives. In this sense, labeling the IRGC a terrorist organization would send a clear message that a state body that purports to enjoy legitimacy for its actions to further the interests of the state that it belongs to must refrain from including terrorism in its toolbox.

Another argument against the IRGC designation notes that IRGC recruits are conscripted, so placing the IRGC on the list of terrorist organizations, and thereby imposing sanctions on the organization's members, would significantly harm people who did not choose this and is thus illegitimate. However, some argue that this argument is based on a mistaken understanding of the IRGC's recruitment process, in which most recruits choose to be there. Since 2010, more than 70 percent of IRGC recruits are active members of the Basij, and even if their enlistment in the Basij did not necessarily stem from ideological motivations but rather from motivations related to personal gain, it is still voluntary even if understandable, and therefore it can be said that for these recruits there is a dimension of choice in enlistment in the IRGC. The remaining 30 percent belong to two groups: one group comprises people with a Master's degree or doctorate, who complete their mandatory service by applying for bureaucratic positions in government ministries and various agencies, and have the possibility of requesting where to perform their service. Those who choose to perform their service in the IRGC can easily be identified via documents and documentation. The second category of IRGC recruits includes people who did not choose to be there, but they constitute at most one fifth of recruits. While it would be difficult to filter out this category and require a special level of investigation, this can be done on an individual basis. Finally, even if there is certain harm to "innocents" who did not choose to join the IRGC, this is not a reason in itself to refrain from placing the organization on the list of terrorist organizations, and this harm should be weighed against the benefit that placing the organization on the list would provide. The greater this benefit, the balance between it and harming some innocent Iranian citizens' ability to leave Iran and as a result to suffer personal sanctions is clearer. Putting the IRGC on the list has both symbolic and practical implications for the fight against terrorism and

preventing terrorist attacks. The more Iran's audacity in operating on European and British soil increases, the broader the implications of these consequences in balancing the benefits and harms.

Another argument against putting the IRGC on the list of terrorist organizations focuses on the consequences of this step for other military organizations. For example, a British organization warned that the UK putting the Revolutionary Guard on the list would undermine the British definition of terrorism and apply the law to the military forces of UK allies. A report that reached The Independent states that putting a state organization on the list of terrorist organizations such that the terrorism law would apply to it would be a deviation from the UK's consistent policy for decades and cast doubt on the definition of terrorism, which so far has proven practical and effective. Because in the wording of the British legislation there is no reference to the motivations or legitimacy of terrorism, it would be difficult to distinguish between the IRGC and legitimate state organizations. It is important to emphasize that this warning should also be heard in Israel, as such a decision could have implications for the activity of military and intelligence bodies in Israel, which could find themselves accused of terrorist activity if the definition of the IRGC as a terrorist organization is accepted.

Even though it is impossible to completely dispel the concern expressed in this argument, legal and formulaic solutions can help distinguish the IRGC from legitimate state organizations. While the organization is an Iranian state military body, it does not behave as required of conventional militaries committed to the Geneva Conventions and international law, but is more similar in its behavior to non-state actors and extreme organizations that intentionally harm civilians and do not relate to the welfare of civilians—which is contrary to the laws of war. Therefore, it is easy to distinguish between it and legitimate state organizations. This might

require certain changes in the wording of the British law, but it appears that these changes are for the best, if this would enable distinguishing between terrorist organizations and legitimate state organizations more easily.

#### **Conclusion and Recommendations**

Recent global events and developments have reopened the argument in the EU and the UK on including the IRGC, or at least the Quds Force, on the list of terrorist organizations. It is evident that some elements in both the EU and the UK are frustrated at the brazen Iranian operations on their territory against opponents of the regime and against Jews and Israelis, and at Iranian support for Russia in its war in Ukraine, which seriously harms European interests.

A change in European and British policy suits Israel's interests. Recently Iran has enjoyed excessive confidence in promoting terrorism worldwide and in attempting to strike Jewish and Israeli targets. This confidence is the product of a variety of developments that have led Iran to presume that the international community will not take serious action against terrorist attacks, and therefore it can afford to continue to carry out attacks as long as it is not forced to pay a price. If the EU and the UK were to take an explicit stance on Iran's terrorism policy, this could change Iran's costbenefit calculation and deter it, at least to a certain extent, from continuing to carry out these attacks. Furthermore, even if this step does not lead to deterring Iran, adding the IRGC to the list of terrorist organizations can have practical implications for the ability to prevent terrorist attacks on European and British soil. Consequently, Israel should strike while the iron is hot and try to maximize the circumstances and encourage Europe to change its policy.

However, policy generally involves two layers—the legal layer and the political layer. While most of the legal difficulties related to putting the IRGC on the list of terrorist organizations can be resolved and do not constitute a decisive argument against this step,

the political issue is undoubtedly a weighty one, especially the concern of the Iranian response. This concern leads many in Europe to argue that the relatively minor benefit of including the IRGC on the list of terrorist organizations does not justify the considerable risk inherent in the Iranian response.

It is evident that some elements in both the EU and the UK are frustrated at the brazen Iranian operations on their territory against opponents of the regime and against Jews and Israelis, and at Iranian support for Russia in its war in Ukraine, which seriously harms European interests.

In response, it is important to emphasize to European officials that the practical consequences of this step, and thus its effectiveness, can be expanded by fully realizing the potential of designating the IRGC and maximizing the possibility of criminalizing membership in and support for the organization. In addition, the symbolic significance of this step should not be dismissed. Iran is currently acting out of a sense of immunity and permits itself to promote terrorism on European and UK soil. Continued silence in response to this activity and ignoring the increasing Iranian brazenness toward Europe, reflected in its policy toward the Russia-Ukraine war and the worsening of the IRGC's conduct toward the Iranian public, could lead to an increase in Iranian terrorism in Europe and increased aid to Russia. Hamas's attack on southern Israel, which was carried out with at least the support and assistance of Iran, if not with Iranian direction, is a clear warning sign regarding the dangers of Iranian international terrorism. Therefore, it should be underscored that a change in European policy is needed that will make it clear to Iran that there is a price to pay for its current conduct, and this price must be high enough to upset the Iranian regime's cost-benefit calculations.

Putting the Revolutionary Guard on the list of terrorist organizations could be the needed

change, but given the limited benefit of this step, and the understandable European concerns about the Iranian response to this step, it is worth presenting the Europeans with other possibilities. One possibility is taking a more limited step, such as adding only the Quds Force to the list of terrorist organizations. This step has fewer advantages both on the practical level and on the symbolic level, precisely due to its curtailed applicability. However, such a step is easier to justify, as terrorism is indeed a main and central component of Quds Force activity. Additionally, and more importantly, it is not expected to lead to as serious an Iranian response as would adding the entire Revolutionary Guard to the list of terrorist organizations, because unlike the organization, which has considerable influence on decision making processes in Iran and is seen as a body that represents the Iranian regime, the Quds Force is a much more limited body, and it is unlikely that harming it would lead the regime to rock the boat.

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