

Trump Administration Renews Waivers to Continue Iran Deal – Maybe for the Last Time

January 12, 2018 | Client Update | 2-minute read

Despite his [long-held stance](#) that it is one of the worst deals ever, today President Trump again executed the necessary waivers to continue the United States' nuclear sanctions relief to Iran in compliance with the Joint Comprehensive Plan of Action (the "JCPOA"). The President made clear in a [statement](#), however, that he "will not again waive sanctions in order to stay in the Iran nuclear deal" unless the United States' European allies agree "to fix the terrible flaws" of the deal, noting that this is the "last chance" to fix the deal. The statement calls on European allies to secure a new supplemental agreement that would impose new multilateral sanctions, with no expiration date, if Iran develops or tests long-range missiles, thwarts inspections, or makes progress toward a nuclear weapon.

President Trump's statement also notes that he is open to working with Congress on bipartisan legislation regarding Iran, but that any bill he signs must: (1) demand that Iran allow immediate inspections at all sites requested by international inspectors; (2) ensure that Iran never comes close to possessing a nuclear weapon; (3) have no expiration date; and (4) explicitly state that long-range missile and nuclear weapons programs are inseparable, and that Iran's development and testing of missiles should be subject to severe sanctions.

At the same time, the Treasury Department's Office of Foreign Assets Control today [designated](#) 14 individuals and entities in connection with serious human rights abuses and censorship in Iran, and support to designated Iranian weapons proliferators.

Should the President decline to renew the necessary waivers when they next become due in May 2018, then certain Iran-related activity by non-U.S. persons which is within the scope of U.S. sanctions relief under the JCPOA will again become sanctionable. Davis Polk will continue to monitor and report on JCPOA developments. In the meantime, we would welcome questions or comments.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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