

# Information Circular

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

1. On 11 December 2024, 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  
نماینده دائمی و قلم متحد و سازمانهای بین المللی  
وین

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

**No. 2312332**

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 and has the honor to hereby enclose an Explanatory Note regarding Report of the IAEA Director General on "Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)" (GOV/INF/2024/17 – 6 December 2024).

The Permanent Mission of the Islamic Republic of Iran would like to request the latter to circulate the enclosed Explanatory Note among the Member States and publish it 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 to the Secretariat of the International Atomic Energy Agency the assurances of its highest consideration.

**Vienna, 11 December 2024**

**To: The Secretariat of the International Atomic Energy Agency**



## Explanatory Note

### On the Report of the IAEA Director General:

### “Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)” (GOV/INF/2024/17, 6 December 2024)

Following the Director General’s Report, “Verification and Monitoring in the Islamic Republic of Iran in light of United Nations Security Council Resolution 2231 (2015)” (GOV/INF/2024/17, 6 December 2024), the Permanent Mission of the Islamic Republic of Iran to the United Nations and other International Organizations in Vienna would like to share its comments on the report as follows:

1. As specified in the Atomic Energy Organization of Iran’s letter on 2 December 2024 to the Agency, uranium enrichment activities, including the latest update of the design information questionnaire (DIQ) at the Fordow Fuel Enrichment Plant (FFEP), should be considered as safeguards obligations and regarded as activities only under the NPT Safeguards Agreement.
2. Regarding paragraph 4 of the report which states: *“In its letter of reply on the same day, the Agency informed Iran that as the change reflected in its updated design information would significantly alter the operation of FFEP, the Agency would need to consider carefully the safeguards measures and activities required to maintain the effective implementation of safeguards at the facility. In its reply, the Agency requested that Iran only change the current operation of FFEP once these necessary additional safeguards measures had been determined and implemented by the Agency.”*, it should be emphasized that:
  - The Modification on the feeding of two IR-6 cascades in Unit 1 for producing UF<sub>6</sub> enriched up to 60% U-235 at FFEP, bearing in mind that the level of enrichment, the number of cascades and enrichment capacity (SWU) as well as infrastructures have not been changed, cannot be considered as a significant change for this facility. Moreover, the safeguards measures in previous periods by taking into consideration of a wide range modes, resulted in a very vigorous measures;
  - The Agency’s request to postpone the operation until the conclusion of an agreement on the safeguards measures for modification is inconsistent with the Safeguards Agreement. In this regard, it is to be noted that upon the

explanation provided by Iran to the Agency's representatives, this request was later withdrawn.

- In fact, modification of design information was provided sufficiently in advance to the Agency (2 December 2024). Moreover, a preliminary understanding of the temporary implementation of the safeguards measures was reached with the Agency. An updated DIQ for the FFEP (IRS-) facility was provided to the Agency (2 and 3 December 2024) and the related Annex of the DIQ was available earlier for examination by the Agency's inspectors at the facility.
- Furthermore, based on Article 4 of the CSA, the Agency's safeguards should be implemented in a manner to avoid undue interference in Iran's peaceful nuclear activities, and particularly in the operation of facilities;

3. Regarding paragraph 9 of the report which states: *“The Agency has evaluated the impact of these changes on the required frequency and intensity of its safeguards measures at FFEP, the implementation of which will need to be facilitated by Iran as a matter of urgency to enable the Agency to provide timely and technically credible assurances that the facility is not being misused to produce uranium of an enrichment level higher than that declared by Iran, and that there is no diversion of declared nuclear material.”*, it should be noted that:

- As clarified above, the mentioned modification of the FFEP operation is fully consistent with Iran's legal obligations under CSA. Therefore, the language referred to as “misuse” and “diversion” in the report are neither technically nor professionally justified in this context. Evidence-based assessment of Member States compliance to their respective CSA obligations, is well-recognized under CSA. Hence, raising hypothetical questions that do not correspond to the activities undertaken by Member States, shall not be incorporated in the report, as it would lead to further ambiguity and misunderstanding.
- Therefore, we expect that any report should consistently meet the text and spirit of the concluded Comprehensive Safeguards Agreement (CSA) between Iran and the Agency.