



**Damned if You Do, Damned if You Don't?
Strategic Implications of Designating Iran's
Islamic Revolutionary Guard Corps as a Terrorist
Organisation**

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Introduction

The effect of sanctions on state behaviour is a complex topic that is frequently debated in international studies, and views vary even among proponents or opponents. Questions of efficacy, the consequences for citizens as opposed to the targeted governments or individuals, and morality and ethics are all topics that have been frequently debated.¹ The various types of sanctions can target individuals if they are limited in scope, or actors or state organs if they are broader. Sanctions are ostensibly a means of achieving specific political goals. In the contemporary debate, however, sanctions are often treated as a goal in themselves rather than as a tool for changing behaviour. This policy brief analyses the legal criteria for and the potential consequences of the European Union (EU) designating a state organ a terrorist organisation, which is one type of sanction that the EU is able to implement. The Islamic Revolutionary Guards Corps (IRGC) in Iran serves as the empirical case, based on the ongoing debate regarding a terrorist designation for that group. The consequences are examined in terms of the consequences for the IRGC as an organisation and the consequences for the EU. Some context is provided regarding the organisational structure of the IRGC and the Islamic Republic. The brief concludes with a

succinct description of the risks and rewards of a terrorist designation and some policy recommendations. The recommendations address under what circumstances the EU should designate the IRGC a terrorist organisation and whether other options might be more effective.

Background

The Islamic Republic of Iran and the IRGC

The IRGC has been described as “the single-most powerful organization in Iran”.² Its leadership is made up of hardliners known for their revolutionary fervour and steadfast loyalty to the Supreme Leader, Ali Khamenei.³ Operating in parallel with the conventional military, the overarching responsibility of the IRGC is the protection and spread of the Islamic revolution.⁴ It controls Iran’s missile forces and manages Iran’s nuclear programme. The IRGC comprises primarily the Quds force, an Aerospace force, a Ground force, a Navy and the Basij paramilitary.⁵ Over time, the IRGC has become the main military force in Iran, while also wielding considerable political and economic influence. According to the political scientists Hesam Forozan and Afshin Shahi, it controls up to one-sixth of the country’s declared gross domestic product (GDP).⁶ Forozan and Shahi, among others,

¹ For a discussion on the efficacy of sanctions see Gaur et al., 2023; Mulder, 2022; Dreyer & Luengo-Cabrera, 2015; Kimberly, 1997; Tsebelis, 1990. For a discussion of the morality and ethics of sanctions see Ellis, 2021; Pattison, 2015; Gordon, 1999.

² Fulton, 2013.

³ Branigin, 2011; see also Alemzadeh, 2019 for a comprehensive discussion of the origins of the IRGC and its religious identity.

⁴ Council on Foreign relations, 2023; International Institute for Strategic Studies, 2021; Rafati, 2017, pp.170-174.

⁵ Council on Foreign relations, 2023; International Institute for Strategic Studies, 2021; Rezaei & Moshirabad, 2018, pp.141-143; Connell, 2010.

⁶ See: Forozan & Shahi, 2017; Abedin, 2011.



describe it as “a state within a state”.⁷ Moreover, it controls a large proportion of both legal and illegal financial markets,⁸ such as through the *IRGC Cooperative Foundation* which serves as a “slush fund for the IRGC’s personnel and their business interests”.⁹

The Quds force is the primary external military force responsible for providing support to Iran’s allies (Hamas, Hezbollah and Palestinian Islamic Jihad). It is involved in terrorist attacks throughout the world.¹⁰ According to intelligence reports from several western countries (e.g. Sweden, Germany and the United Kingdom) Iran is actively conducting intelligence operations in western states.¹¹ The Basij is the paramilitary wing of the IRGC, used to repress and crush domestic dissent and protest, as was seen during the Green Movement which followed on from the disputed elections in 2009, and again following the death of Mahsa Jina Amini in 2022.¹²

The US precedent and the EU’s approach

Ever since the 1979 Iranian revolution, the Islamic Republic has been subject to various sanctions regimes from, among others, the United States and the EU. These sanction have targeted both individuals and state organs, such as the Quds force and the Basij.¹³ However, there has been some divergence between the EU and the US on

how to deal with Iran. The US has been more active, having designated Iran a state sponsor of terrorism in 1984, implemented unilateral sanctions and resorted to independent military action to undermine the Islamic regime. During the presidency of Donald J. Trump, the US withdrew from the Joint Comprehensive Plan of Action (JCPOA) and implemented a “maximum pressure” campaign against Iran.¹⁴ It subsequently designated the IRGC a foreign terrorist organisation (FTO) in 2019.¹⁵

The EU, by contrast, made a concerted effort to revive the JCPOA and abstained from designating the IRGC a terrorist organisation, signalling a different strategy from the US. More recent developments, however, linked to Iran’s material support for Russia’s full-scale invasion of Ukraine, and the killing of Mahsa Jina Amini and the repression of the ensuing protest have hardened the EU approach.¹⁶ The European Parliament recently recommended that the IRGC be designated a terrorist organisation.¹⁷ This has been supported by high-ranking officials and politicians, not least the President of the European Commission, Ursula von der Leyen, which is indicative of an increased political willingness to act forcefully against Iran. Nonetheless, the European Council has thus far rejected the recommendation.

⁷ Forozan & Shahi, 2017, pp.73, 83; Abedin, 2011, p.381.

⁸ Council on Foreign relations, 2023; Batmanghelidj, 2018; Rafati, 2017, pp.168-174.

⁹ US Department of the Treasury, 2023

¹⁰ Council on Foreign relations, 2023; Rezaei & Moshirabad, 2018, pp.138-140.

¹¹ Swedish Security Service, 2023; Weinthal, 2023; Corera, 2022; Lawless, 2021.

¹² Keath, 2018; Dehghan, 2017.

¹³ Ostovar, 2016, pp.20-21.

¹⁴ Pompeo, 2020.

¹⁵ United States Department of State, 2019; Cambridge University Press, 2019; United States Code, 2016.

¹⁶ Kijewski, 2023.

¹⁷ Grischek, 2023.



Legal criteria for a designation

The EU criteria

The EU Terrorist list enables an individual to be designated a terrorist or a group/entity to be designated a terrorist organisation. It distinguishes between *external terrorists* and *internal terrorists*.¹⁸ The common position stipulates how persons, groups and entities are identified and to what extent their participation in terrorist acts is required. This can involve “Persons who *commit, or attempt to commit, terrorist acts or who participate in, or facilitate, the commission of terrorist acts*”, or groups and entities controlled by, acting on behalf of or under the direction of the identified persons, groups or entities.¹⁹ According to the EU, a terrorist act seeks to achieve any of the following aims: (a) to seriously intimidate a population; (b) to unduly compel a government or international organisation to perform or abstain from performing any act; or (c) to seriously destabilise or destroy the fundamental political, constitutional, economic or social structures of a country or an international organisation.²⁰ Once a terrorist organisation or an individual has been identified, a legal case/investigation addressing the status of the organisation/individual must be brought by one of the member states. A decision to add an organisation to the list must be made unanimously by the 27 EU member states.

¹⁸ Council of the European Union, 2023a. There are currently 13 persons and 21 groups and entities listed as external terrorists; the list is regularly reviewed, at a minimum every 6 months.

¹⁹ EUR-Lex, 2001a.

²⁰ EUR-Lex, 2017; EUR-Lex, 2001a.

A case needs to be brought by a member state that constitutes a decision “taken by a judicial or equivalent competent authority [...]”, as well as an investigation, prosecution or conviction “for a terrorist act or an attempt to carry out or facilitate such an act”.²¹ Such a case needs to be within a reasonable time frame of the crime in question, and the accused need to be afforded the right to defend themselves in court. Additions may be based on UN Security Council decisions or by referencing a decision by a third country.²² However, it is important to note that the General Court has on two separate occasions – *Hamas v Council of the European Union* and *Kurdistan Workers’ Party (PKK) v Council of the European Union* – judged that US court decisions cannot be invoked as it is deemed that they do not constitute a *competent authority* due to a lack of observance of the rights of the defence.²³ In the PKK case, the General Court ruled that the European Council had failed to obtain the “necessary verification as regards observance, in the United States of America, of the principle of the rights of the defence”.²⁴

The consequences of designation, as stipulated in Council Regulation (EC) No 2580/2001, target the economic and financial dimensions of the designated entity and stipulate increased judicial and police cooperation between EU member states.²⁵ However, they do not involve travel bans, as proponents often claim. Instead, travel bans

²¹ Council of the European Union, 2023a.

²² Levitt, 2023; Council of the European Union, 2023a.

²³ InfoCuria Case-Law, 2022; InfoCuria Case-Law, 2019.

²⁴ InfoCuria Case-Law, 2022, § 95-98.

²⁵ EUR-Lex, 2001b.



can only be enforced through *human rights sanctions*. A terrorist designation is an economic tool that targets the financial activities of the designated party, such as to prevent monetary transactions to or from the organisation in question. Furthermore, it is important to note that the IRGC and its personnel, either directly or indirectly, are already subject to EU sanctions regimes that are more comprehensive than a potential terrorist designation. The IRGC is targeted as part of EU sanctions regimes linked to violations of human rights, developing weapons of mass destruction, and supporting or participating in the Syrian civil war or in the Ukraine war.²⁶

The case for an EU designation

On 19 January 2023, the European Parliament passed a resolution that called for the IRGC to be added to the EU terrorist list in response to events in Iran pertaining to the death of Mahsa Jina Amini, the ensuing brutal suppression and killing of protesters, and its support for Russia's invasion of Ukraine.²⁷ The main judicial hurdle concerned the ability to attribute with certainty any terrorist act to the IRGC, and the ability to distinguish between acts perpetrated by the IRGC and acts by other organs of the Iranian state, such as the Ministry of Intelligence, or Iranian proxies, such as Hezbollah.

Iran has been explicitly named by the intelligence agencies of several western countries, such as Sweden through SÄPO and the UK through MI5, as actively planning or attempting terrorist activities aimed at western countries and their citizens.²⁸ There have also been historical cases where terrorist acts have been carried out.²⁹ More importantly, contemporary cases highlight the terrorist activities of the IRGC, either directly or through proxies such as Hezbollah.³⁰ Among these are the thwarted plots in the EU in which the IRGC has been explicitly implicated,³¹ as well as an alleged IRGC plot in 2021 against the President of the Central Council of Jews in Germany, Josef Schuster.³² The overarching problem, however, has been how to prove IRGC involvement beyond legal doubt. Rather than explicitly identifying the IRGC, plots are often presented as by "Iranian intelligence" in general terms or as acts perpetrated by known IRGC proxies, such as Hezbollah. For this reason, it is important to distinguish between a strictly judicial analysis of the legal merits of a terrorist designation and a political/intelligence analysis that indicates an organisation's responsibility. If purely intelligence information, circumstantial evidence and previous knowledge were used, the IRGC would appear to constitute a terrorist organisation in accordance with the EU definition. Although it is possible to draw these analytical conclusions, the challenge

²⁶ European Commission, 2023; Council of the European Union, 2023b; Official Journal of the European Union, 2022. See also: Grischek, 2023.

²⁷ European Parliament, 2023.

²⁸ Swedish Security Service, 2023; McCallum, 2022.

²⁹ Dalton, 2018; Hakakian, 2007; CNN, 1997.

³⁰ For a presentation of Iranian support to Hezbollah terrorist acts see: Gol, 2020; Truzman, 2020; Levitt, 2013; Rotella, 2012; Norton, 2007; Levitt, 2003; Long Commission, 1983. For a comprehensive presentation of reported acts perpetrated by the IRGC see: Aarabi, 2021.

³¹ Bundesministerium Inneres, 2021.

³² Grandjean et. al., 2022; Times of Israel, 2022.



lies in making a legal case, as the lack of EU action highlights.

From a legal standpoint, it is important that accusations are not made broadly or frivolously. Once charges have been brought by a prosecutor, there must be sufficient evidence for a conviction. At the time of writing, the EU has not deemed the legal criteria to be sufficiently met. No case has been brought by an EU member state and the IRGC has not been afforded the opportunity to defend itself in court. This showcases the nuances and difficulties that are inherent in terrorist designations from a legal perspective.

Two levels of consequences

The second aspect to be considered concerns the consequences for the IRGC, but also for the EU. In this section, these two levels of consequences are described and critically assessed.

Consequences for the IRGC

There are conflicting views on the efficacy of designating the IRGC a terrorist organisation. Here, the US experience is worth taking into account. According to Danny Glaser, a former official at the Treasury department quoted in *The Economist*, the US designation did not add anything to the existing sanctions against Iran.³³ The analysis in *The Economist* is that the designation strengthened Iranian hardliners and the internal position of the IRGC, and made their smuggling networks more lucrative.³⁴ Moreover, according to

Tanya Mehra, a Senior Research Fellow at the International Centre for Counter-Terrorism in The Hague, a terrorist designation would showcase European support for the Iranian protesters without impeding much of the activity of the IRGC.³⁵ As stated above, the IRGC and key personnel in the organisation are already subject to four comprehensive sanctions regimes. In contrast to these two more pessimistic viewpoints, however, Matthew Levitt, a Fellow at the Washington Institute for Near East Policy, argues that the consequences would be far-reaching. It would criminalise membership of and support for the group, restrict access to financial resources and services, lead to greater police and judicial cooperation among EU member states and increase the risks for Iran by showcasing greater European resolve concerning terrorist activities. Finally, he points out that the European Parliament has called for expanded travel sanctions targeted at the Iranian leadership.³⁶

The argument by Levitt regarding travel bans is a separate discussion since a terrorist designation in and of itself does not involve travel bans. Only human rights sanctions involve travel bans.³⁷ As suggested above, the economic consequences of a terrorist designation are quite difficult to pinpoint. It is important to differentiate between what is judicially possible and the practical results. In theory, the “death” of the JCPOA would mean that access to SWIFT, which was extended as part of the JCPOA, would once again be impeded.³⁸ However, this is merely a theoretical discussion since when it reimposed sanctions on Iran, the US

³³ The Economist, 2019.

³⁴ The Economist, 2019.

³⁵ Lawal, 2023.

³⁶ Levitt, 2023.

³⁷ EUR-Lex, 2001b.

³⁸ SWIFT, 2016.



threatened SWIFT with its own sanctions if it did not adhere to them, in effect circumventing any EU attempts to ignore the US sanctions.³⁹ Moreover, the IRGC is already subject to comprehensive sanctions regimes from the EU and the US, which means that a lot of the economic constraints associated with a designation are already in place; for example, US sanctions already restrict the ability to do business with the EU, and limit access to European banks and the SWIFT financial system. By extension, this means that if the EU wanted to further impede the economic activities of the IRGC, it would have to convince countries such as China, which use their own financial systems, to prevent the IRGC from gaining access to their banks.

There are two further complications to consider when analysing the potential effects of a terrorist designation. First, if all the members of the IRGC were designated as belonging to a terrorist organisation, this would make it more difficult, but in no way impossible, for the EU to conduct diplomatic negotiations with Iran. This was evident during the JCPOA negotiations, since several of the individuals in the Iranian delegation were subject to various sanctions and travel bans. This meant that the EU had to find legal leeway to allow them into the EU. Second, a terrorist designation would force the EU to classify all members of the IRGC as terrorists, meaning that even junior members who had joined the IRGC as conscripts would be classified as terrorists.

Some observers argue that a terrorist designation would primarily have a symbolic impact. However, labelling it as merely a

symbolic gesture is not entirely accurate, as tangible consequences would follow such a designation. It would unify policy on Iran and the IRGC in the West, creating a united front, while at the same time exacerbating the international standing of the IRGC and Iran. Furthermore, even though many members of the IRGC hold prominent political or diplomatic positions, questions of traditional diplomatic protection from prosecution could be disregarded.⁴⁰

Consequences for the EU

There are conflicting views on what the consequences would be for the EU if it were to designate the IRGC a terrorist organisation. In accordance with article 4 of Common Position 2001/931/CFSP, on the application of specific measures to combat terrorism, there would be increased judicial and police cooperation between the EU member states. This would enable the EU to act more effectively against plots orchestrated by the IRGC or their affiliates. It would also entail increased resources that could be used to curtail violent covert activities and strengthen the judiciary in future prosecutions. Kasra Aarabi, the former Iran Programme Lead at the Tony Blair Institute for Global Change, has argued that the UK should enact a terrorist designation. He claims that a designation need not cut off communications but that “a constructive dialogue between the West and Iran cannot happen without firm conditions imposed by the West”.⁴¹ He highlights the UK’s continuing diplomatic relations with the Lebanese government after the designation of Hezbollah.⁴² In contrast to this reasoning, some EU officials have said that an EU

³⁹ Al Jazeera, 2018; Reuters, 2018.

⁴⁰ Sinkaya, 2016, pp.234-239.

⁴¹ Aarabi, 2023.

⁴² Aarabi, 2023.



terrorist designation would “dampen the prospects of reviving the nuclear deal”,⁴³ while Iranian representatives have said that if a designation happens, they will withdraw from the JCPOA and expel inspectors from the International Atomic Energy Agency (IAEA).⁴⁴ It has been suggested that the JCPOA is the only impediment to Iran becoming a nuclear weapon state, and that its existence is therefore pivotal.⁴⁵ However, Rafael Grossi, head of the IAEA, has highlighted several difficulties regarding its oversight of Iran’s nuclear programme: the amount of material, the equipment and the number of centrifuges they possess. According to the IAEA, Iran has produced enriched uranium up to 60%, which is a breach of the 3.67% cap set by the JCPOA.⁴⁶ Iran has also stated that the “European forces stationed in the region would be classified as ‘terrorist groups’ if the IRGC were blacklisted”.⁴⁷ Iran designated US Central Command (CENTCOM) and the United States itself a “state sponsor of terrorism” following the 2019 US FTO designation of the IRGC.⁴⁸

Some observers argue that a terrorist designation would allow dialogue and diplomatic relations with Iran but there are several counterarguments that must be considered. While a designation in itself does not mean that diplomatic relations with the Islamic regime would end, it would certainly worsen relations. Consequently, this might lead to increased confrontation, diplomatic embargoes and perhaps even geopolitical retaliation by Iran. For example, there have

already been not-so-subtle inferences from state officials and members of the Majlis (Iranian Parliament) regarding the consequences of a designation. One example of this is the parliamentarian, Esmail Kowsari, who stated that that Iran would “[...] respond to [EU] actions; first through our embassies and then we will take actions against their interests”.⁴⁹ As with the US designation, it is likely that Tehran would respond with a reciprocal terrorist designation of EU forces stationed in the Middle East. Moreover, it could dampen prospects for EU member states in their negotiations to free EU citizens currently imprisoned in Iran.⁵⁰ It could also open a “Pandoras box” of issues and questions on what constitutes a terrorist organisation and to what extent such designations can, or should, be applied to state actors and organisations.

Arguments on the potentially negative impact on the JCPOA must also be considered when discussing the potential consequences of designation. The main point of the JCPOA has been to increase transparency and “control” over the Iranian nuclear enrichment programme. Proponents highlight the vital importance of constraining the Iranian nuclear programme. However, various experts and critics argue that the end of the JCPOA need not be entirely negative. Scholars such as Moshirabad, Rezaei and Mark Dubowitz argue that the IRGC benefited economically from the lifting of sanctions as part of the JCPOA, which by extension strengthened its ability to secure

⁴³ Rose, 2023.

⁴⁴ PressTV, 2023.

⁴⁵ Rose, 2023.

⁴⁶ Argano, 2018.

⁴⁷ Agenzianova, 2023.

⁴⁸ Associated Press, 2019.

⁴⁹ See: Fazeli, 2023; Mahmoudi, 2023.

⁵⁰ Agenzianova, 2023.



its regional objectives. They argue that if the JCPOA were to end, so too would the sanction reliefs that the EU has implemented, which would negatively impact the IRGC's economic activities.⁵¹

What these commentators fail to mention is the fact that the IRGC being economically impacted by either sanctions or sanction reliefs is a given since it is an integrated part of the Iranian economy. The question is rather how much Iran, and by extension the IRGC, would be affected, since trade with the EU is minimal. Moreover, it is unlikely that countries such as China, which are already doing business with Iran despite the existing sanctions, will change their stance based on EU decisions on Iran. On the other hand, it would create a greater coherence among western countries in their policies towards Iran, and would further isolate the Iranian government. No matter which position is adopted, it is of paramount importance that the goal of a designation is clear beforehand.

Conclusions

This brief highlights the legal and political complexities associated with a prospective EU designation of the IRGC as a terrorist organisation. Thus far, the EU has argued that it lacks a legal basis for designation. Given the inherent difficulties of obtaining legal proof of direct IRGC involvement in terrorist activity, this problem is likely to persist. Even with a legal basis, political considerations would be an additional determinant of whether the IRGC should be added to the terrorist list. There are strong political arguments in favour of designation, but these too require careful analysis. Either

way, it is of the utmost importance that the EU thoughtfully considers what could be achieved by such a designation in relation to its stated goals. All the aspects of this risk-reward calculation must be carefully considered.

Risks

The EU should anticipate that reciprocal designations will affect their interests in the region, including possible designations of individual states and their militaries. Although there is already an increased threat level for EU citizens and EU interests in the Middle East and North Africa, as well as in Europe, a terrorist designation could trigger more brazen and daring action by Iran and its allies. As argued above, questions remain as to whether the designation would deter or hinder the IRGC from continuing with its terrorist activities, or would be counterproductive. Diplomatic relations would be likely to be negatively affected, the end of the JCPOA can be expected and Iran could display an even greater resistance to complying with IAEA regulations. Finally, prisoner exchange negotiations and the likelihood of Iran extraditing imprisoned EU citizens would probably also be negatively affected.

Rewards

Previous attempts at “soft power” negotiations with the Islamic Republic have failed to deter it from continuing its domestic repression and support for terrorist groups, and to pose a threat to EU citizens and member states. A terrorist designation would signal a change in EU strategy, demonstrate

⁵¹ Rezaei & Moshirabad, 2018, pp.146-155.



that the EU will not tolerate state-sponsored terrorism and successfully isolate Iran from the West diplomatically. It might even force Iran to enter into negotiations with the West on more favourable terms. It would also have symbolic value by sending a message of support to both Iranian dissidents in the EU and protesters in Iran, while also sending a strong message to the Iranian government. It could increase judicial and police cooperation within the EU on combating terrorism perpetrated by the IRGC. For proponents of greater isolation of Iran, the end of the JCPOA would be a further step towards that goal, which they believe would also hamper the IRGC's ability to conduct operations.

Policy recommendations for the EU

The EU has implemented a strategy based on legal and political caution regarding the prospects of designating the IRGC a terrorist organisation. This is a reasonable strategic given the stakes. However, the question of a terrorist designation of the IRGC has been portrayed by proponents as a question of credibility for the EU. Can the European Union claim to protect democratic values and a rules-based international order, both domestically and internationally, without designating an organisation that has actively committed, attempted and sponsored terrorist activities globally, including on EU territory?

As demonstrated above, however, a deeper understanding is required of the various perspectives that distinguishes between a political and a judicial analysis, and examines the potential consequences of the various choices. Although it appears obvious that "soft power" negotiations with the Islamic

Republic have failed, simply designating the IRGC a terrorist organisation without carefully studying the consequences would be both hasty and risky. Although analytical conclusions can be drawn based on circumstantial evidence and previous knowledge that would support a designation, we need to acknowledge the fact that, according to the EU, the legal criteria have not been fulfilled. Moreover, it is not a given that a terrorist designation would be the most effective measure. Instead, one could argue that the EU should implement further human rights sanctions, which would involve travel bans. Either way, it would benefit the EU to consider whether further human rights sanctions would be more effective at targeting the IRGC and its capabilities. Whatever the EU decides, a vigorous and clear-eyed debate must precede the decision that considers the very serious advantages and disadvantages that a terrorist designation would entail.



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