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

1. On 3 June 2025, 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 نزد دفتر ملل متحد و سازمانهای بین المللی
وین

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

No. 2517089

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 (IAEA) and has the honor to hereby enclose an Explanatory Note on Report of the Director General to the IAEA Board of Governors "NPT Safeguards Agreement with the Islamic Republic of Iran" (GOV/2025/25 - 31 May 2025) and would like to request the latter to publish the Explanatory Note 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 the Secretariat of the International Atomic Energy Agency the assurances of its highest consideration.



To: The Secretariat of the International Atomic Energy Agency (IAEA)



Permanent Mission of the Islamic Republic of Iran
to the United Nations Office and other International Organizations in Vienna

Explanatory Note

on the Report of the Director General to the IAEA Board of Governors
“NPT Safeguards Agreement with the Islamic Republic of Iran”
(GOV/2025/25 - 31 May 2025)

Abstract of the Explanatory Note

Regarding the Director General report (GOV/2025/25), the absence of any evidence of diversion to military purposes reaffirms the peaceful nature of Iran’s nuclear program. There is no credible evidence proving that the outstanding issues carry any proliferation risk. As stated in the report, “Iran continues to cooperate with the Agency on matters of routine safeguards implementation, and the Agency implements a large verification effort in Iran commensurate with Iran’s nuclear fuel cycle and activities”.

The Director General submitted a report to the Board of Governors (as contained in GOV/2015/68) which includes the “Final Assessment” of all past and present outstanding issues. Following to that report, in December 2015, the Board of Governors adopted a resolution (GOV/2015/72) noting the Director General’s report and also noting that “this closes the Board’s consideration of this item”. The Director General’s recent report is a clearly contradicts the Final Assessment and the resolution GOV/2015/72.

It is a well-established expectation that the Agency assessments be founded solely upon verified, credible, and non-controversial sources. The reliance on unverified information derived from open sources or intelligence provided by known third parties to the Secretariat is inconsistent with the principles of objectivity, impartiality, and professionalism that underpin the Agency’s mandate.

All Iran's nuclear material and activities have been completely declared to and verified by the Agency. Iran has exhausted all its efforts to discover the origin of such particles in those locations. According to the extensive investigations and examinations, relevant Iranian security authorities have recently discovered further clues confirming that sabotage and/or malicious act have been involved in the contamination of those locations.

Inclusion of some irrelevant issues in the report is in contraction with the Agency's professionalism, objectivity and impartiality. For instance, 60% uranium enrichment is not prohibited under the NPT and Iran's enrichment and stockpile of 60% are fully under the Agency's monitoring and verification.

The Islamic Republic of Iran would like to share its comments and observations on the Director General Reports to the IAEA Board of Governors GOV/2025/25 as follows:

General Comments

1. The IAEA Director General's comprehensive and updated assessment concerning Iran's peaceful nuclear program comes at a critical juncture in Iran-IAEA interaction. The content and context of the report will have ramifications far beyond the ongoing engagement between the Islamic Republic of Iran and IAEA .
2. The content, tone and scope of the report is highly objectionable and marks a clear departure from the Director General's putatively impartial mandate as well as the caveats per the OP6 the resolution GOV/2024/68; a proceeding not supported by a large number of Member States, including Board members, and driven with a politicized approach trying to abort the then-successful visit of the DG to Tehran. The Islamic Republic of Iran seizes the opportunity to register its strong reservations and resolute objection to the so-called assessment's attitude towards the hard-earned achievements made possible by Iran's cooperation. It is equally regrettable that the ungrateful language of such an assessment impedes further venues of Iran-IAEA cooperation.
3. Reiterating its strong principled position on rejection of all WMDs, including nuclear weapons, the Islamic Republic of Iran underscores its commitment to the Non-proliferation Treaty and the right to peaceful use of nuclear energy under Article IV of the Treaty 2. Furthermore, despite the cumbersome impediments to the discharge of its obligations under the Treaty, Iran honors its commitments under the Comprehensive Safeguards Agreement (CSA) and proceeds with the development of its peaceful nuclear program to meet the domestic needs. As elaborated in previous Explanatory Notes, including inter alia INFCIRC/1290 dated 20 May 2025 and INFCIRC/1275 dated 4 March 2025, Iran maintains that absent verifiable, authentic and technical evidence, would only lead to politically motivated conclusions.
4. Political disputes, should there exist any, must be addressed through appropriate diplomatic channels and not through the Agency's platform. Iran urges the IAEA to return to a strictly technical posture in its reporting, assessments and communications. As has so far been the case, Iran stands ready to further engage with the Agency to address any outstanding technical issues arising from its Safeguards obligations.

5. The Islamic Republic of Iran, guided by firm religious and strategic principles, has consistently and unequivocally rejected the acquisition, production, stockpiling, or use of weapons of mass destruction, particularly nuclear weapons, which it regards as inhuman. This rejection is not merely rhetorical; it is deeply embedded in Iran's national security doctrine, reflected in its binding international legal commitments—most notably as a non-nuclear-weapon state party to the NPT—and reinforced by the Supreme Leader's religious decree (fatwa) prohibiting such weapons.
6. The unprofessional approach taken by the Director General of the IAEA in his reporting and statements as well as aggrandizing the alleged issues, including in media interviews, derails the Agency from its technical and impartial role. Also, repeatedly citing unreliable and unauthentic information as references, presented as “all safeguards-relevant information” available to the Agency further undermines its credibility.
7. By disregarding the progresses made also during the Director General's then-visit to Iran and the ongoing cooperation under the CSA, the adoption of the resolution (GOV/2024/68) contrary to the expectation of Iran and the DG, failed to meet the standard of objectivity and impartiality required for the Agency's decision-making. Its politically motivated nature—pushed by the very States with a record of non-compliance with their own JCPOA obligations—raises serious concerns about the abuse of the Board's mandate for extraneous ends. Such conduct erodes the credibility of the IAEA as a neutral verification body. The resolution -not supported by a large number of Member States- represents an ill-conceived act that undermines both the spirit and letter of the IAEA Statute and the NPT.
8. Despite strong reservations about the resolution's content and legitimate opposition to the approach of the E3 and the US as the resolution's sponsors, the Islamic Republic of Iran, based on a principled approach has opted for a constructive interaction with the Agency within the framework of rights and obligations stipulated under the NPT and the Comprehensive Safeguards Agreement. Nonetheless, Iran invited the Director General to facilitate further interaction and tried its best to make the visit a success, which was acknowledged by the DG. This visit was followed twice by the Deputy Director General for Safeguards and his accompanying team to Tehran.

Comments on Section A (Paras. 1-10, “Introduction”)

9. Regarding para. 6, the voluntary and provisional implementation of the Additional Protocol has been ceased according with the law "**Strategic Action Plan to Remove Sanctions and Protect Iranian Nation's Interests**" passed by the Parliament after unlawful withdrawal of the United States from the JCPOA, coupled with the E3's inability to uphold their commitments, in exercising its rights under paras. 26 and 36 of the JCPOA.
10. Although the report in this section uses “third party” as one of its information sources, the main assessments of the report as a whole, including in paragraph 78 as well as the section related to the so-called locations, are entirely derived from the unsubstantiated documents and baseless claims presented by the Zionist regime. This in itself constitutes a clear deviation from the principle of verification based on reliable sources -a principle consistently regarded as customary practice in international law. It is evident that failure to adhere to this, significantly undermines the report's credibility. No need to mention that the third-party information has been provided by staunch enemy of Iran which not only constantly is plotting against Iran's relation with the Agency, but also is committing sabotage, attack, and threat of attack against Iran, as well as assassination of Iranian nuclear scientists.

Comments on Section B (Paras. 11-12, “Background”)

11. Contrary to the Agency’s claim in Paragraph 11, no detailed information concerning “questions on nuclear material and nuclear-related activities” were provided. Nevertheless, Iran, on a voluntary basis without having any duty according to Additional Protocol (Art. 4.d.) and CSA (Art. 69), granted access to the Agency.
12. While the November 2024 resolution mentions two alleged locations, the DG report in paragraph 12 as well as the entire section C (Comprehensive evaluations of the four locations) in contrast to the resolution and in a move to aggrandize the alleged issues devotes extensive space – 9 pages of the 22-page report – to four alleged locations instead of two. It is noteworthy that this section paints an unrealistic picture of activities. Such approach is completely devoid of any truth.

Comments on Section C (Paras. 13-52, “Comprehensive Evaluations of the Four Locations”)

13. The issue related to the so-called Lavisian-Shian location, after intensive verification activities by the Agency was declared closed in 2004 (GOV/2004/83). Surprisingly, the Agency in this report has reopened the issue and raised new claims such as “natural uranium in the form of a metal disc” and “production of explosively-driven neutron sources” without providing any supporting document thus far to prove its claims.
14. Regarding paras. 15 to 19 “**Lavisian-Shian**”, the accusations lack any safeguards ground and is based on invalid sources without providing any documentation. These issues were declared closed by the Board of Governors in 2015, reopening such historically settled matters undermines the credibility and impartiality of the Agency.
15. Regarding discrepancy, especially in paragraphs 20-27, it is notable that the materials at the JHL have been continuously under Agency seal and verified repeatedly by the Agency since 2003. As it was said before, the issues related to the so-called “Explosively Driven Neutron Sources” (EDNS) and “Uranium Metal” have been raised for the first time and is yet to be discussed with Iran. This way of assessment and reporting without due interaction and sharing any information is both unprofessional and unfair. This section tries to portray even routine development projects such as civil projects as evidence of sanitization. This is a clear indication that the DG has exceeded his mandate while venturing into irrelevant or even insignificant matters.
16. Regarding paras. 28-33 “**Marivan**”, photos, provided by the so-called third party, do not constitute reliable evidence for the Agency to act upon. Faulty assumptions would lead to flawed conclusions. The information furnished to the Agency by Iran’s arch enemy, the Zionist regime of Israel, are not credible. Mere photos—the authenticity of which is highly questionable—of alleged neutron detectors, would not constitute a concrete basis for the Agency to draw conclusions. Thus, drawing conclusions based on inauthentic photos contravenes the principles of impartiality and professionalism expected of the Agency. The Agency had duly been informed that the buildings of interest in the report had previously been assigned to mine work. Exhaustive explanations on the issue have been provided to the Agency and it had already been granted Complementary Access, leading to the eventual closure of the file. On the bunker issue, sufficient clarification had been provided to the Agency. Notwithstanding, the assessment contained in the report relies on forged documents and inauthentic information leading to leveling accusations against Iran.

17. On para. 34-41, “**Varamin**”, as it has been frequently explained by Iran, there is/was no location required to be declared under the CSA. From a safeguards point of view, the term “*facility*” does not apply to this location and is therefore incorrect. The allegation of existing “undeclared pilot-scale plant used between 1999 and 2003” is not supported by reliable information and authentic documents. It is rather based on false and fabricated documents provided by an ill-intended entity to the Agency. The reference made to a single poor-quality satellite image for assessing that “... containers removed from Varamin were eventually transferred to Turqzabad...”, is not adequate to corroborate such a claim. Iran has submitted the required explanation on Varamin location to the Agency, both in written form and verbally. Lack of economic justifications led to the termination of Sodium Sulphate extraction at the location in 2004. The fact that the Agency could not trace Sodium Sulphate does not necessarily indicate the absence of the aforesaid activity. Never before had the Agency raised a question with regard to the presence of UF₆ cylinders and the mentioned equipment with Iran. This is a totally new issue, with no supporting document provided by the Agency. The arrived assessment is not factual and lacks relevant documentation/proof. As has been officially relayed to the Agency on multiple occasions, including on 28 May 2025 during the visit of the DDG, the possibility of sabotage at this location is substantial and very real.
18. Regarding paras. 42-52 “**Turqzabad**”, the Agency's assessment is not based on authentic information and evidence. Turqzabad is actually an industrial place encompassing various kinds of warehouses and depots for storing detergents, chemicals, foodstuff, fabrics & textiles, vehicles tire and parts, tubes & joints, and some industrial scraps. As it was said earlier, the minor land alteration had been performed at the request of the landlord by the tenant before the handover of the property. The request made by the Director General for technical explanations has already been responded on several occasions and there are no further updates and no other plausible technical explanations. There are substantive traces of sabotage, as presented to DDG on his latest visit to Iran on 28 May 2025, as echoed in para. 49 of this report. Iran stands ready to furnish further information related to the sabotage network, aiming to address the insufficiencies of information as described by the Agency. As this is an ongoing effort, complementary and supporting documents could be made available in due course. It should be noted that the cameras at the location, were only installed after it was mentioned in the media. Hence, any expectation as to having recorded the incident prior to their installation would be unrealistic. As a result of sabotage incident at Turqzabad and Varamin, the assessment contained in the

report lacks substantial basis. Similar to the Agency—not having an assessment on the U-235 enriched up to 18% --Iran has also no clue with regard to the origins of the said material, except as to attribute the plausible cause to sabotage. As it has been frequently said, and based on our investigations, no intact container was removed from this location in the period referred to by the Agency. As presented to the Agency officials through a footage of container dismantlement, the activity can be completed rather quickly, in a much shorter time than the Agency estimates. The argument made by the Agency that particles of the same signature have been found at JHL and Turquzabad is an unprecedented statement, and, contrary to footnote 57, Iran has not received any information whatsoever. The location in question is an industrial scraps storage, movement of containers is a usual activity in that area. On the discrepancy, it should be reiterated that there was no material imbalance at JHL, as it has been under constant monitoring and the seal of the Agency until the material was dissolved at UCF. Such linkage allegedly assumed between Turquzabad and Lavisan-Shian is a new claim without Iran being informed about. As a result of very intensive investigations carried out into the background of activities of this location, except sabotage as the most probable indication, no reason has been found for the presence of such particles. It is to be noted that most recently, clues have been found by relevant Security Authorities of the country confirming further high probability of sabotage. On the Agency's incorrect assumption of intact removal of containers from the location, the explanations indicating incorrectness of the Agency's assumption, has already been provided to the Agency. However, Iran expresses its readiness to extend the explanations within the modality to be agreed upon in line with the 4th March 2023 Joint Statement. The Agency is not expected to seek nuclear material and equipment at Turquzabad that have never existed in the first place.

Comments on Section D (paras. 53-67, “Cooperation between Iran and the Agency”)

19. It should be mentioned that Iran has rendered maximum cooperation to the Agency under the CSA, and the Additional Protocol—when it was provisionally and voluntarily implemented. On some occasions, further access, beyond CSA and AP obligations had also been granted.
20. In the section concerning Iran's cooperation, the Director General, while referring to his own visits and those of the Deputy Director General for Safeguards to Iran and meetings held at various levels and the agreements reached including the Joint

Statement agreed upon in March 2023, and the various ensuing executive measures taken by Iran— including granting access, installing/servicing surveillance equipment, and the decision to address a range of matters, such as the HEU. This latter DG’s initiative, also agreed by Iran, was obstructed as a result of the Board’s adoption of an unconstructive, politically motivated resolution. It is quite ironic that this immense volume of cooperation and interaction has not only gone unappreciated, but also has been labeled by the DG as “*less than satisfactory*”. A primary reason for this is the expectation of measures beyond Iran's international obligations, a position also observed from some Western countries by ignoring the distinction between safeguards obligations and JCPOA commitments. Such an approach is not only unrealistic but, by disregarding other realities—including the US withdrawal from the deal in 2018, its re-imposition and continued escalation of sanctions, and the serious and evident default of other European participants in adhering to their commitments— presents an incomplete picture of reality and is unacceptable.

21. Against the backdrop of the intensive monitoring and verification activities carried out by the Agency in Iran, the large number of approved designations of inspectors, and the significant budget -both regular and extrabudgetary- allocated to finance the work of inspectors in Iran, de-designation of a few pales in importance compared to the overall picture. Meanwhile, the exercise of the right of de-designations is a sovereign prerogative established under Article 9 of the CSA. Iran has also expressed its readiness to accept new designations.

22. Clarifications on the Agency baseless allegations about Sanitization conducted at four locations

Location	On the accusations concerning the sanitization
Lavisian- Shian	All credible legal documents relevant to the appropriation of the location by the Municipality for the construction of an inter-city express way, had been submitted to the Agency in 2003-2004. It was evident at the time that the sanitization was out of the question and the matter was concluded.
Varamin	Alterations in Varamin were limited only to one building, which was set to be repurposed. This location used to be assigned to Sodium Sulphate extraction. Following the inquiry by the Agency on the development, which could not be

	characterized as “sanitization”, Iran replied accordingly.
Turquzabad	The chronological explanations of this location in which metal scraps were bargained, had been provided to the Agency. Apparently, no sort of destruction has been performed there which could be reported by the Agency as “sanitization”.
Marivan support area	Since the location was abandoned, scavengers of metal scraps had demolished the abandoned building in order to scavenge iron pieces; however, all parts of debris existed when the Agency inspectors were present there. At that time, the DDG, who was visiting this location, confirmed that such kind of demolishing cannot be considered as “sanitization”.
Marivan explosives test area	Concerning the bunker existing in Abadeh location, it was clarified that the area—a decommissioned mine— had served as a munition-defusing depot.

23. Contrary to the Agency’s claim, Iran had clarified the nature and purpose of explosive testing activities. As was said, the explosions were controlled measures to defuse the worn-out, or malfunctioned munition. Raising such allegations would no way be relevant to cooperation-related matters.
24. To the extent possible, Iran has cooperated with the Agency on questions related to Turquzabad. There are no photos published in Iranian media predating the unveiling of Turquzabad by the Agency. Had such photos been presented to Iran by the Agency, Iran would have provided the necessary explanations. In case such alleged photo is in Agency’s possession and the latter refrained from bringing it to Iran’s attention, it would be indicative of Agency’s insufficient cooperation with Iran.
25. Casting the same issue in different forms constitutes an unfair aggrandizement of trivial matters. Repeating a claim does not make it true.
26. Iran’s high level of cooperation, including on a voluntary basis, with the Agency led to the conclusion of two, out of four, outstanding issues (locations), later to be reintroduced by the Agency under different pretexts.

27. It is highly regrettable and quite astonishing to witness that the Agency is using such slanderous language in paragraph 60 without presenting any substantiated proof or document. Iran contends that the Agency must avoid such reckless attributions and stand accountable for this slander. This matter would remain on Iran's agenda until such time as the Agency redresses the affront incurred by such wording, and withdraws the accusations contained therein.
28. Modified Code 3.1, which pertains to the early declaration of nuclear facilities, does not constitute a safeguards obligation, and the IAEA's continued invocation of it as such does not confer any legitimacy thereon. In fact, following the U.S. withdrawal and the E3/EU's failure to fulfill commitments, Iran exercised its rights under JCPOA paras. 26 and 36, ceasing voluntary transparency measures beyond its CSA, including Modified Code 3.1 (per JCPOA preamble para. 13 and Annex I para. 65) in February 2021.
29. Regarding the alleged lack of transparency, leading to the disruption of IAEA's continuity of knowledge of Iran's nuclear program, Iran continued the implementation of a range of voluntary transparency measures beyond its legal obligations under the Comprehensive Safeguards Agreement following the U.S. illegal withdrawal from the JCPOA. In this respect, the Additional Protocol and Modified Code 3.1 must be viewed as part of Iran's extra-CSA voluntary measures tied to the successful implementation of the 2015 nuclear deal. These measures—including enhanced access and real-time monitoring—were sustained unilaterally for a full year as a goodwill gesture and in support of diplomatic efforts, despite the absence of reciprocal compliance or any concrete benefit. This underscores Iran's constructive approach and stands in direct contradiction to claims of opacity and obstruction.

Comments on Section E (paras. 68-76 “High-level Meetings and Consultations”)

30. The Agency had requested access to two locations under Art. 4.d. AP—the legal basis for which had become void due to insufficient reasoning—which, as a measure of good faith and in line with the Joint Statement 26 August 2020, was granted on a voluntary basis. Despite Iran's furnishing of information and taking the necessary transparency measures in line with the Joint Statement of 4 March 2023, including the installation of 9 cameras beyond CSA obligations, the Agency failed to appreciate this cooperation. Contrary to what has been claimed in the report, the said statement did not mention any particular location or issue. It was supposed that further cooperation be based on would-be agreed modality. The clarification of outstanding safeguards issues is an ongoing process and was

discussed during these meetings. However, due to the technical nature of these issues, it is unrealistic to expect that such high-level meeting would be the right place for them to be settled.

Comments on Section F (paras. 77-80, “overall assessment”)

31. The Agency’s claim of “an undeclared structured nuclear program carried out by Iran until the early 2000s and that some activities used undeclared nuclear material” mentioned here for the first time without being priorly shared with Iran, is unsubstantiated and lacks any foundation. Moreover, this issue was closed after implementation of the “Road Map” in 2015. On Turquzabad and other locations, as well as other parts of the report, overreliance on third party information has resulted in inaccurate conclusion.
32. Iran has announced time and again its adherence to the NPT commitments. The Supreme leader’s fatwa on prohibition of WMD is another indication of the peaceful nature of Iran’s nuclear program. Referring to personal views as evidence of Iran’s attempt to acquire nuclear weapons is not acceptable –a matter that for officials of any Western or non-Western country desiring nuclear weapons has never caused Agency’s sensitivity.
33. It should be emphasized that Iran’s level of enrichment is consistent with the technical needs for peaceful nuclear activities on a developmental scale – something that is also common in several other Agency member states from different regions of the world. It should be further highlighted that so long as a country’s nuclear activities are under the IAEA’s monitoring, there is no cause for concern. According to Agency instruments, there exists no limitation on the level of enrichment, and the only relevant restriction is the prohibition on the diversion of such activities or materials to non-peaceful purposes. Notably, nowhere in the report is there any ambiguity concerning Iran’s current nuclear activities or any deviation in its nuclear materials or operations. Within this framework, the Director General has neither the right nor even the obligation to designate a lawful activity as one of concern. The Islamic Republic of Iran, once again—emphasizing that it has not pursued and never intends to pursue nuclear weapons—stresses that its very membership in the NPT and full cooperation with the Agency leaves no room for any accusation of Iran seeking to acquire nuclear weapons. Iran has been subject to the most extensive verification activities in the Agency’s history with full transparency and expects that in return for such precise adherence to obligations, this cooperative approach be recognized by the Agency and its member states.

34. The IAEA is not a judiciary body and its statutory foundations bind it to a strictly technical, non-political, verification-oriented mandate. According to IAEA Safeguards Glossary, “safeguards” are a set of technical measures applied by the Agency to independently verify that nuclear material is not diverted to nuclear weapons or other nuclear explosive devices. To this date, there is no report by the DG indicating that such diversion has ever occurred in Iran. Political speculations must not be spun as technical and legal concerns.

Comments on Section G (paras. 81-86 “Summary”)

35. Whether the context is the JCPOA or the CSA, confidence-building measures are a two-way street and commitments must be reciprocated. Under current circumstances, remaining within the framework of the NPT along with daily implementation of the Comprehensive Safeguards Agreement are, in and of themselves, strong confidence-building measures, signaling that Iran is choosing transparency over opacity, cooperation over confrontation, and verification over politicization. All of this however rests on maintaining two prerequisites: the centrality of NPT as the cornerstone of the nuclear non-proliferation and disarmament regime, and the IAEA as an impartial, technical, and more importantly non-politicized Agency. It should be noted that all allegations pertaining to Iran’s past nuclear program were, pursuant to the IAEA November 2015 Resolution following the conclusion of the JCPOA, formally closed.

36. The Islamic Republic of Iran did not and does not have any undeclared nuclear activities or materials. It is certain that various explanations and documents regarding the alleged locations, which relate to more than two decades ago, have also been provided to the Agency. While all of Iran's nuclear activities and materials are under the Agency's supervision and verification, and no deviation has been observed in them, the exaggeration of these non-important and alleged issues and the expression of excessive concern about them is merely an excuse to create artificial concerns. This is especially true given that in our region, the Zionist regime operates outside all disarmament treaties for weapons of mass destruction and is armed with such weapons, yet the Agency and claimant countries lack the courage to take any action against this regime.

37. The sources of information for the DG’s report are highly questionable – all information available in OP6 of November 2024 BoG resolution cannot include data received from the intelligence service of a third party whose ill intentions toward Iran do not even need to be proven; otherwise the assessment based on such data undercuts claims of impartiality and professionalism. Ironically, the

same entity is a non-party to the NPT and the only possessor of WMD in the region.

38. Although the immense magnitude of Iran's cooperation and interaction nullifies any disparaging claims on impediment, it has however gone unappreciated, and sinisterly been labeled as "*less than satisfactory*". Based on Iran's extensive level of cooperation, it is truly expected that such cooperation be acknowledged as satisfactory.
39. The report specifies that the Agency has found no credible indications of the existence of an undeclared structured nuclear program currently being implemented in Iran, and it takes note of statements by Iran's highest authorities that the use of nuclear weapons is incompatible with Islamic law.
40. In conclusion, Iran is gravely concerned at the prospects of the Agency becoming an instrument of interference in the internal affairs of the Member States. Offering political assessments, value judgements, unsubstantiated concerns lacking technical and legal grounds, are tantamount to that interference. Only by avoiding politicization and adhering to the Agency's technical mandate can the IAEA's credibility and impartiality be promoted.
41. In light of the foregoing, Iran calls upon the entire membership to stand with the truth, ensuring that the IAEA is neither instrumentalized for the political agendas of a few, nor deprives a Member State of its inalienable right to peaceful nuclear energy.

Conclusions

First, the IAEA's Director General has cited the November 2024 Resolution as the mandate for the preparation of this report. Regrettably, the resolution in question was adopted in a political move by the three European states and the United States in the Board of Governors without consensus and with total disregard for the outcomes of the Director General's visit to Iran. It is unfortunate that the Director General, in the present report, has made no reference whatsoever to this disregard for his mandate by those states.

Second, the entirety of this report pertains to the alleged presence of a limited amount of nuclear material at four purported locations more than two decades ago, based on a series of fabricated data provided by the Zionist regime. Notably, nowhere in the report is there any ambiguity concerning Iran's current nuclear activities or any

deviation in its nuclear materials or operations. In this regard, several points merit consideration:

1. All allegations pertaining to Iran's past nuclear program were, pursuant to the November 2015 Resolution following the conclusion of the JCPOA, formally closed. The IAEA's current actions are, therefore, in explicit contradiction with the provisions of the resolution in question and constitute a political attempt to resurrect unproven and misleading allegations.
2. The IAEA itself states in the report that two of the four locations in question—namely Lavisan-Shian and the so-called Marivan—are no longer considered outstanding issues. The emphasis placed on these two matters and their reappearance in the report serve no purpose other than to repackage old, unsubstantiated allegations into an inflated dossier for the purpose of renewed political exploitation against Iran.
3. As to the other two locations—Varamin and Turqzabad—it must be underscored that Iran has furnished the IAEA with the necessary explanations and supporting documents, including during two recent visits by the Deputy Director General and Head of the Department of Safeguards to Tehran. The Islamic Republic of Iran has had no undeclared nuclear materials or activities, nor does it currently possess any. It is a matter of record that extensive documentation and explanations have been submitted to the IAEA regarding these two locations, the allegations concerning which date back more than twenty years. While all of Iran's nuclear materials and activities are under the IAEA monitoring and verification and no deviation has been observed, the magnification of these two alleged issues and the exaggerated expression of concern thereon is a mere pretext to fabricate a contrived sense of alarm—particularly in a region where the Zionist regime remains outside all instruments of weapons of mass destruction disarmament treaties and is armed with such weaponry, while the Agency and the claimant states lack the courage to take any action.

Third, although the IAEA claims in its report that “these three locations, and other possible related locations, were part of an undeclared structured nuclear programme carried out by Iran until the early 2000s and that some activities used undeclared nuclear material,” it also explicitly affirms elsewhere in the same report that “the Agency has found no credible indications of the existence of an undeclared structured nuclear program currently being implemented in Iran, and it takes note of statements by Iran's highest authorities that the use of nuclear weapons is incompatible with Islamic law.” This acknowledgment by the IAEA reveals that, under political pressure

from certain states, the Agency has been reduced to an instrument for reopening previously closed files, which have not been proven, thereby exerting pressure on Iran. **Fourth**, another issue raised in the report that lies entirely outside the scope of the IAEA's assigned mandate is that of 60% uranium enrichment. The report states: "Although enrichment activities under safeguards are not prohibited per se, the fact that Iran is the only non-nuclear-weapon State producing and accumulating uranium enriched up to 60% continues to be a source of serious concern and has drawn international attention in view of its potential proliferation implications." On this point, it must be emphasized that so long as a country's nuclear activities are under the IAEA's monitoring, there is no cause for concern. According to Agency instruments, there exists no limitation on the level of enrichment, and the only relevant restriction is the prohibition on the diversion of such activities or materials to non-peaceful purposes.

Within this framework, the Director General has neither the right nor even the obligation to designate a lawful activity as one of concern. Mr. Grossi's action in this regard is entirely political and aligned with the interests of certain specific states, for which he must be held accountable.

Fifth, another extraneous matter raised by Mr. Grossi in the report relates to Modified Code 3.1. It must be acknowledged that following the U.S. withdrawal from the JCPOA and the failure of the three European parties to fulfill their obligations under the agreement, the Islamic Republic of Iran—in execution of the *Strategic Action Law* enacted by the Islamic Consultative Assembly—suspended the implementation of its voluntary nuclear obligations beyond the Safeguards Agreement under the JCPOA. Modified Code 3.1, which pertains to the early declaration of nuclear facilities, does not constitute a safeguards obligation, and the IAEA's continued invocation of it as such does not confer any legitimacy thereon.

Sixth, the report further alleges that "in recent years, Iran has implemented de-designations of experienced inspectors in a manner that undermines the Agency's ability to implement safeguards effectively and efficiently." It must be noted, however, that pursuant to the IAEA's report on the implementation of the Safeguards Agreement in 2024 (SIR), as of 31 December 2024, a total of 274 inspectors were employed in Iran's operational divisions and the verification office, with 125 of those inspectors specifically stationed in the Iran verification office. That the Islamic Republic of Iran, in response to the political action of the three European states in the Board of Governors, revoked the designation of certain inspectors must not be interpreted as an impairment of the IAEA's capacity or capability in Iran. It is self-evident that Iran cannot reasonably be expected to place full confidence in inspectors from such states,

and the withdrawal of their designation constitutes the Islamic Republic of Iran's sovereign right under the Safeguards Agreement. It is indeed regrettable that Mr. Grossi ignores the presence and work of 125 inspectors from various countries operating in Iran and reduces the entirety of the IAEA's capability to a mere handful of inspectors from three European states.

Seventh, all of the foregoing stands in stark contrast to the fact that this very report states: "Iran continues to cooperate with the Agency on routine safeguards matters, and the Agency is undertaking extensive verification efforts in the country in line with its nuclear fuel cycle and related activities." Moreover, the 2024 Safeguards Implementation Report notes:

"Based on the evaluation conducted, the Secretariat has concluded that the declared nuclear material in 31 States, including Iran, remained in peaceful activities."

That same report also contains several noteworthy figures. For instance, it indicates that among the 32 countries that have concluded safeguards agreements without Additional Protocols in force—of which Iran is one— 21 out of 100 safeguarded nuclear facilities are located in Iran. Of the 682 inspections conducted among this group of states, 493 were carried out in Iran alone. Out of 224 design information verifications, 144 were conducted solely in Iran. Of the total 1,895 inspector-days across this group, 1,260 were expended in Iran alone. Furthermore, the report states that €22,626,000 of the Agency's regular €38,905,000 budget for 2024 was spent exclusively in Iran. Additionally, €4,300,000 of the Agency's €28,000,000 in extrabudgetary or voluntary contributions were also allocated to activities in Iran.

What does such an extensive volume of the Agency's activities in Iran signify, if not Iran's constructive and comprehensive cooperation with the IAEA? That the Agency has found no diversion and no irregularity whatsoever with respect to the ongoing safeguards concerning Iran's nuclear materials and activities, yet has directed its focus toward previously closed matters—what does this indicate, if not a politically motivated act carried out under the pressure of certain states?

Eighth, throughout the history of the IAEA, numerous instances of politicization and political manipulation have been observed within this international body. The deafening silence of Western countries, the United States, and Agency officials in the face of the Zionist Israeli regime exemplifies this politicization.

Ninth, and finally, let it be stated unequivocally: The Islamic Republic of Iran is neither pursuing nuclear weapons nor does it possess any undeclared nuclear materials or activities. Iran has hitherto remained committed to all of its obligations. The cost that Iran has borne has been for the sake of preserving its dignity, honor, progress, and

steadfastness in the face of coercion and the hegemonic ambitions of certain powers. Should these states choose to abuse Iran's patience and persist in their erroneous path, Iran will be compelled—commensurate with the evolving circumstances and actions of the other parties—to adopt and implement appropriate decisions, the responsibility, consequences, and ramifications of which shall rest entirely with those states.