In the Name of God, the Companionate, the Merciful

Pursuant to Human Rights Council Resolutions 27/21 and 36/10 and General Assembly resolution 74/154, and the call for submissions by professor Alena Douhan, the Special Rapporteur on the negative impact of the unilateral coercive measures on the enjoyment of human rights, the Islamic Republic of Iran has the honor to submit its responses and comments to the questions raised hereunder in the UCM-study questionnaire on the Impact of Unilateral Sanctions on Human Rights during the state of emergency amid the COVID-19 pandemic.

**I. Do sanctions introduced by individual states or regional organizations without or beyond authorization of the UN Security Council targeting states and/ or non-state actors have an impact on enjoyment of human rights by the citizens of targeted states in the situation of natural and man-made emergency, including COVID-19 pandemic? Please, elaborate in details.**

1.Unilateral coercive measures and legislations are contrary to international law, international humanitarian law, international human rights law, the Charter of the United Nations and the norms and principles governing peaceful relations among States. The UCMs have adversely affected the population of States targeted, including those wherein emergency situation has been declared. Unavailability, inaccessibility and deprivation of financial resources due to UCMs including those applied in the form of economic and financial sanctions on the revenues of the States targeted have a direct effect on the potential capacities of those States to provide humanitarian needs and services in particular the timely procurement of medical supplies and equipment for their population in controlling and combatting the pandemic. The repercussions of unilateral coercive measures imposed on countries, have also negatively affected the efforts of relevant international organizations to assist the countries concerned in responding to the outbreak. Some of the negative consequences of the UCMs in this context could be highlighted as follows: prohibiting companies and business partners from trade with targeted States due to the fear of being punished by sanctioning State, severe restrain in transfer of money for importing goods and services, reducing significantly financial resources to financing funds for health care and humanitarian related personnel and organizations, restriction on delivering of goods and services due to the sanctions imposed on the shipping, insurance and other pertinent sections. Consequently, access to medicines, medical devices, equipment and services are restricted due to a series of obstacles.

2. To effectively combat a pandemic, states have an obligation to cooperate with each other. This obligation is recognized in various international documents:

* Achieving international co-operation in solving international problems of an economic, social, cultural, or humanitarian character is one the purposes of the Charter of the United Nations, In Accordance with the Charter, States have the duty to co-operate with one another, irrespective of the differences in their political, economic and social systems, in the various spheres of international relations, in order to maintain international peace and security and to promote international economic stability and progress, the general welfare of nations and international cooperation free from discrimination based on such differences. Articles 55 and 56 of the Charter refers to the promotion of solutions of international economic, social, health, and related problems by the UN and the pledge of the members to take joint and separate action in co-operation with the Organization to achieve them.
* Declaration on Principles of International Law Concerning Friendly Relations and Co-operation among States highlights the development of cooperation between nations as one of the fundamental purposes of the United Nations.
* The obligation to cooperate has also been reiterated in various resolutions of the UN General Assembly. Paragraph 5 of the Annex to the GA Resolution 46/182 asserts that "the magnitude and duration of many emergencies may be beyond the response capacity of many affected states. International cooperation to address emergency situation and to strengthen the response capacity of affected states is thus of great importance."
* According to the preamble of International Health Regulations (IHR), “The enjoyment of the highest attainable standard of health is one of the fundamental rights of every human being without distinction of race, religion, political belief, economic or social condition” and “The health of all peoples is fundamental to the attainment of peace and security and is dependent upon the fullest co-operation of individuals and States.” furthermore, based on the article 44 of IHR, States Parties shall undertake to collaborate with each other, to the extent possible, in (a) The detection and assessment of, and response to, events as provided under these Regulations and (b) the provision or facilitation of technical cooperation and logistical support, particularly in the development, strengthening and maintenance of the public health capacities required under these Regulations.

3. Unilateral coercive measures seriously hamper the cooperation among the States, especially in a situation where States affected by a pandemic are in need of international assistance. It's worth noting that by reducing the financial resources of the targeted States, UCMs have negative effects on their capacity to fulfill their commitments under various international legal instruments and mechanisms.

4. Persons affected by disasters are entitled to the respect for and protection of their human rights in accordance with international law. International assistance in response to disasters requires request and consent by the affected State and shall be delivered in accordance with the principles of the sovereign equality of States, respect for the territorial integrity of the affected State and non-interference in the internal affairs of States. Furthermore, the assistance should be provided in accordance with the principles of humanity, neutrality, impartiality, and non-discrimination. Unilateral coercive measures by adversely affecting the implementation of the rules and principles governing provision of humanitarian assistance, partially or totally prevent delivery of such assistance.

**II. What specific aspects of human rights are affected by unilateral sanctions in targeted States during the pandemic? Can you give examples of particular rights most affected by unilateral sanctions and in what way? What steps were taken by the sanctioning States on one hand and in the targeted States on the other hand to address those human rights violations and remedy the situation?**

5. Imposition of unilateral sanctions amid the coronavirus pandemic violates the right to life and health and breaches all economic, social, and cultural human rights, and most adversely affect the right to life and health of the members of vulnerable groups including children, elderly persons, and patients with immunodeficiency. In other words, many aspects of the human rights are affected by sanctions in particular the right to life, the right to health the right to an adequate standard of living, including food, clothing, housing and medical care, the right to freedom of hunger. It further undermines the principle of non- discrimination and non-interference in the internal affairs of the member of the United Nations as enshrined in the charter and violation of international law, human rights law.

6.The cruel US sanctions against the Iranian people are a textbook example of blatant violation of human rights law. Since its withdrawal from the nuclear agreement in 2018, the US government has imposed unilateral coercive measures against Iran, reinstating previous and introducing new sanctions, thus violating the human rights of Iranian citizens, including their right to life, self-determination and, health, education, economic activity, development and appropriate standards of life.

7. In this regard, the following points are notable:

* As a result of the US withdrawal from the JCPOA and violation of UN Security Council Resolution 2231 and the US president, Secretary of State, and Secretary of Treasury's threats of impositions of secondary sanctions on countries engaging in economic cooperation with Iran, the inhuman sanctions against Iranian citizens have escalated outrageously.
* The US sanctions have breached Iranian citizens' right to life by impeding the proper delivery of social services, jeopardizing food security, causing a shortage of pharmaceuticals, radiopharmaceuticals, and medical supplies, and blockading the aviation industry and aircraft components (which seriously imperils the safety of Iranian airliner flights).
* The US unilateral sanctions against Iran cover all airlines of the Islamic Republic of Iran. As announced explicitly by the International Court of Justice, even contracts signed between Iranian and US companies and other foreign companies prior to the re-imposition of sanctions for the procurement of Iranian airliners' spare parts, have been nullified due to the sanctions. Moreover, the sanctions have prevented companies to providing airport goods and services and refuse cooperation with Iranian airlines including fuel supply to Iranian aircraft.
* The International Covenant on Economic, Social, and Cultural Rights has frequently stressed rights such as the right to equitable and appropriate work conditions, the right to decent life including access to sufficient food, clothing, housing, health, education, advances in science, and the outcome of intellectual and artistic achievements. The US unilateral sanctions wittingly, deliberately, and self-interestedly violate Iranian people's entitlements enshrined in the International Covenant on Economic, Social, and Cultural Rights.
* The US illegal sanctions against Iran have violated and ignored the Iranian people's right to development as an inseparable part of the basic human rights. The Human Rights Councils Resolution 27/21 on human rights and unilateral coercive measures explicitly lists trade restrictions, sieges, trade bans, and asset freezing as coercive measures violating human rights.
* Considering the US overt and covert objectives, which intend, ultimately, to maximize pressure on Iran in pursuit of US bullying policies and illegitimate goals, the US unilateral sanction against Iran undoubtedly also violate the Iranian nation's right to self-determination and sovereignty, which are enshrined in the UN charter, resolutions and multiple declarations.
* The remarks of the US President and US Secretary of State over the past 4 years including their assertion on the imposition of toughest sanctions, highest level of sanctions, unprecedented financial pressure against Iran, sanctions against third countries with economic relations with the Islamic Republic of Iran have placed the articulators of such remarks among the hardened violators of human rights.
* In reports on unilateral sanctions against Iran, the Special Rapporteur on unilateral coercive measures has expressed concern over the consequences of US withdrawal from the 2015 nuclear agreement, maintaining that the imposition of sanctions breaches multiple provisions of the 1955 Treaty of Amity, Economic Relations and Consular Rights between the United States and Iran, calling for the establishment of mechanisms to secure compensation and damages in response to the unilateral coercive measures and describing the exploitation of unilateral sanction as economic warfare.
* In the order of provisional measures issued by the International Court of Justice (ICJ) on 3 October 2018 on the case filed by the Islamic Republic of Iran against United States of America with regard to the Violation of the 1955 Treaty of Amity, Economic Relations, and Consular Rights, the court maintained that the unilateral sanctions have precluded the execution of financial transaction to procure goods including foodstuffs and medical equipment and supplies, and that restriction in the purchase and import of humanitarian goods including foodstuffs and pharmaceuticals such as life-saving medications, etc. seriously impinges upon the health of the Iranian people. The ICJ's order also cautions against the possible irreversible consequences of the measures approved and enacted by the United States.

8. In contravention of the ICJ provisional order, there is abundant evidence that the USA, in addition to the frequent banking, financial, and trade impediments, has also placed food and pharmaceuticals on the list of its cruel sanctions in order to harm the Iranian people. The remarks made by the US Secretary of State in an interview with the BBC on 7 November 2018 throw this reality into stark relief. In the interview, he irresponsibly maintained:" Well, remember, just so you remember, the [Iranian] leadership has to make a decision that they want their people to eat." It is worth noting that the use of food and pharmaceuticals as weapons against civilians is an example of "crime against humanity." The US Secretary of State has continued to make such hostile remarks so far; on 7 June 2019 he emphasized in a tweet that the maximum pressure campaign against Iran will continues.

* In addition, the European Union has also been unable to enforce the so-called "blocking statue" and fulfill its JCPOA commitments in practice, with the EU officials even maintaining that considering the nature of the international banking system, the blocking statute may not have a considerable effect as many banks use the USA financial system and the dollar in their transactions.
* Besides, burdened by the heavy, oppressive US pressure, the three European countries (E3) have been unable to officially announce the launch of the SPV, with US officials threatening to sanctions the country hosting or the banks cooperating with the mechanism.

**III. Do sanctions have an impact on non-targeted third States and their citizens in the course of emergency, including the pandemic? Can you provide examples of this impact?**

9. Extraterritorial application of domestic laws against the Islamic Republic Iran evidently have had an immense adverse direct and indirect impact on the enjoyment of human rights in third countries, especially neighboring ones such as Afghanistan, Iraq and Pakistan. A very clear and tangible example of this is that, their right to development has been heavily sacrificed to the narrow interest of the blind unilateralism. For instance, many lucrative transits, rail, road and energy mega projects essential to realize the right to development and creation of thousands of job opportunities-particularly in neighboring landlocked countries- are lost due to the imposition of exterritorial sanctions.

10. Direct and indirect negative impacts of the illegal UCMS on construction of Peace Pipeline (between Iran – Pakistan &India) and also disruption in full operationalization of the Chabahar mega project- and other similar plans around the country- are among many vivid examples indicating negative impacts of realization of the right to development of Iran and other neighboring countries in the region. Furthermore, application of the extraterritorial foreign legislations prevented these countries, as well as other third parties, including the EU, China, India, Russia and many others from entertaining free trade and economic multilateral relations with Iran. Thereby direct and indirect costs and consequences of this practice flagrantly violate the right to development of the people in Iran and a certain number of other countries.

11. The recent imposition of further wide-scale secondary sanctions purporting to apply to third parties not concerned with the dispute has attracted widespread condemnation from the overwhelming majority of the international community. The European Union, in particular, once again voiced its condemnation of extraterritorial coercive measures on the occasion of the repudiation of the Joint Comprehensive Plan of Action by the United States in May 2018. As it explained: “Some of the measures which the United States will reactivate against Iran have extraterritorial effects and, in so far as they unduly affect the interests of natural and legal persons established in the Union and engaging in trade and/or the movement of capital and related commercial activities between the Union and Iran, they violate international law and impede the attainment of the Union’s objectives.”.

12. Another aspect is the negative impacts of sanctions on the rights of refugees. The Islamic Republic of Iran has hosted a large number of refugees for more than four decades. UCMs are adversely affecting the living conditions, health and educations of refugees and negatively impacting their enjoyment of basic human rights in particular right to health and right to life and right to education and undermining the capacity of Iran as host country to protect the refugees. The Islamic Republic of Iran, has outperformed its obligations by treating refugees equal with its own nationals and sharing with them a considerable portion of economic and social capacities. Furthermore, by preventing the movement of a multitude of refugees to the European borders plays a significant role in containing the refugee problem across the globe despite lack of sufficient assistance from the international community.

**IV Do unilateral sanctions have an impact on the ability of states to react to emergency situations and to protect human rights especially of the most vulnerable categories of population?**

13. Imposition of illegal, unilateral sanctions has seriously impeded the delivery of international aid in emergencies. UCMs particularly US unilateral sanctions have had severe negative impact on the ability of the government to react to the emergency situations. In fact, the US unilateral coercive measures have drastically hindered the government`s efforts to effectively respond the COVID-19 pandemic.

**If yes, what areas/ spheres / types of activity/ vital infrastructure appeared to be the most affected in the course of COVID-19 pandemic?**

14. The widespread negative impacts of UCMs have affected different areas/ activities and infrastructures in Iran, the exhaustive list of which is subject of an independent lengthy report. An indicative sample of major negative impacts of UCMs on healthcare system which is quite pertinent to the specific subject of this study is as follows:

15. Procurement of medical and pharmaceutical items: Suspension of cooperation between supplier companies of goods and health equipment with Iran. During the outbreak until now, the following list of pharmaceutical and medical companies have discontinued their cooperation and stopped the selling of their products to Iran due to concerns about US secondary sanctions:

a) Air Liquid Medical Systems providing anesthetic and respiratory equipment;

b) CARL ZEISS providing ophthalmological equipment;

c) GETINGE providing cardiac and endoscopic equipment; and

d) Monlycke Health Care AB providing advanced wound dressings.

16. These illegal UCMs have led not only to the further increased of mortality rates as result of damage to heart, kidney, immunodeficiency, and metabolic, etc. caused by COVID-19 because of the shortage of medical supplies and equipment.

17. Disruption in securing medical and pharmaceutical equipment that are needed for the diagnosis, control, and treatment of Corona-virus due to the concerns of exporting companies about US punitive measures;

18. Serious disruption in the supply of vital devices including ventilators, CT scan, dialysis, CRRT, ECMO, digital radiology, electroshock, RT-PCR, video laryngoscope, and portable ecosonography equipment as well as all personal protection equipment (N95 & three-ply masks and protective gowns).

19. Disorders in the preparation and provision of Corona diagnostic tests including “primers and probes, diagnostic molecular kits, and RNA extraction kits’ personal protective equipment required by laboratory staff and Screening equipment and devices.

20. Disruption in the purchase of ambulances, which is a serious need of the Iran’s health care system. As a result of serious disruption in the above three sections, the process of timely diagnosis, identification and isolation of Coronavirus carrier and patients, and finally curbing the spread of the disease have been faced with serious delays and challenges. The Lack of personal protective equipment (PPE) has endangered the health of health care personal and medical staff, and exacerbated the disruption of national campaign against Corona.

21. Serious disruption in providing pharmaceuticals (including Remdesivir & Favipiravir and other medications required for covid-19 treatment) used for in-patients treatment corona-virus (including in hospital or at home) and other drugs for the research and treatment of Covid-19.

22. Erosion delays and lack of timely access to spare parts, repair and service of vital medical equipment such as ventilators, MRIs, CT scans machines, etc.

23. due to the impacts of oppressive and illegal US sanctions even the delivery of vital medical supplies did not take place on time and further to that, the varieties of ventilators, dialysis filters, oxygenators, infant and children's oxygenators, CT scan machines, minus-80-degree freezers, and diagnostic kits have failed to be operationalized.

24. A list of the afore-mentioned companies is as follows:

“EBIT GENERAL TRADING registered in Canada,

-BAZTER registered in Swiss,

- RESMED registered in Australia,

- ARIES SUN TRADING registered in UK,

- YADRO registered in USA,

- HOLDING LIMITED registered in UK,

-TAICHI registered in Japan,

-HOFFRICHTER registered in Germany,

- SORIN registered in Milan – Italy,

- AUSTROMENA is registered in Swiss,

-WORLDWIDE RESOURCE GROUP LIMITED registered in China.

What groups of population are affected the most?

25. Given the following facts, almost all the people are affected, but the vulnerable groups of the people affected the most. Shortage of financial resources due to the sanctions imposed on oil industry is amongst the negative impacts of UCMs which have affected the provision of supplying medical items and equipment and reduced the purchasing power of public and private health companies.

26. The US blocked Iran's request to receive financial assistance from the World Bank to respond to COVID-19 pandemic swiftly.

27. The timely transportation of medical supplies disrupted as a result of the sanctions imposed on Iran airlines. The US sanctions on Iranian airlines have disrupted the process of direct imports of medical requirements and, slowing down the country's fight against coronavirus.

28. Cutting off scientific cooperation; Restrictions on access to comprehensive medical databases such as (Pub Med) for the Iranian medical community. Due to the transferring Pub Med server to Google, access to online databases has been impossible for the Iranian research and medical community.

29. Patients with cancer, hemophilia, thalassemias, MS, epilepsy and other special diseases are reportedly more vulnerable than others. According to the managing director of the Iranian thalassemia society in 2018, 90 thalassemia patients lost their lives due to the lack of medicine caused by sanctions. Moreover, in 2019, 60 patients died while normally they would live should their medicine were provided.

30. In addition, the Managing Director of the EB House announced in November 2019 that 15 children suffering from EB have lost their lives due to shortage of medicine and medical supplies caused by US sanctions. The supply of wound dressing for EB patients usually was provided by the Swedish Molnlycke company. The company has announced in a formal letter, its inability to provide dressings to Iran, owing to the sanctions. This is the case while the EB patients would suffer intense pain and psychological depression, in addition to the threat of death, due to chronic and massive infection,

**V. What types of sanctions have the most negative impact over the enjoyment of human rights in the course of COVID-19 pandemic?**

31. Since the beginning of the outbreak of Corona-virus crisis in early 2020, Iran like many other countries suddenly faced the challenge of providing medical supplies and equipment to prevent the prevalence of the disease. The unilateral coercive measures (UCMs) by the US have negatively affected the process of combating the prevalence Corona-virus and managing public health in Iran. On one hand, provision of medical items and requirements are hindered and lead to serious challenge for the country in controlling the disease and protecting the health of Iranian citizens. On the other hand, the UCMs have had a multi- layer negative impact on the health of the Iranian people by targeting the vital sectors such as medicine supply, medical equipment and financial resources of the country. The combination of these factors has challenged the prevention and controlling of the virus in recent months.

**Please provide detailed information about obstacles, which were caused by the sanctions, in the implementation of the national health care system’s preparedness and response plan to combat COVID-19 pandemic.**

Please refer to paragraphs 14-31.

**VI. Are humanitarian exemptions sufficient, effective and efficient to protect the life of people and to guarantee human rights especially of the most vulnerable groups in the course of natural and man-made disasters including COVID-19 pandemic?**

32. Due to the comprehensive nature of unlawful unilateral coercive measures or sanctions, humanitarian exemptions are not sufficient, effective, and efficient to protect the life of the people in the course of natural and man-made disasters for the following reasons.

33. The long process of getting licenses and authorization undermine the time sensitivity element, which is the integral part of search and rescue operations and international humanitarian aids. Besides, vague and obscure directives have forced many companies to exercise over-compliance with UCM. Meanwhile, absence of banking channels makes so-called humanitarian exemptions pointless. As vivid examples, even the UN country office and the ICRC in Iran were not exempted to provide required assistance to the affected people even during the course of pandemics and disaster management emergency cases in Iran.

34. In practice the US sanctions are a major stumbling block even in delivery of humanitarian assistance in a non-wartime situation. Scarcity and soaring prices of medicine within Iran, in particular those high techs imported medicines for the hard-to-cure patients is a very convincing case that clearly negates the US's empty claims on providing humanitarian assistance. On the contrary, facts and figures, coupled with tangible well-documented grievances of the affected people at large prove application of the "Maximum Pressure" even on humanitarian grounds.

35. Furthermore, the humanitarian exemption is not sufficient. For the protection of certain human rights such as the right to life, food and medical care in time of disasters, some conditions should be fulfilled. Firstly, this protection requires allocation of many resources, while the targeted State cannot acquire the needed financial resources. Consequently, it cannot afford those transactions in the first place, notwithstanding any nominal or real exemption which may be declared in that regard. Secondly, delivering humanitarian commodities to a targeted State is very hard or even impossible, taking into account that commercial aerial and naval fleet of the State may be under sever UCMs and/or other parties may also be under and pressure not to carry goods to the ports or airports of targeted State.

36. Secondly, exemptions are neither effective nor efficient at all. For the most part, the so-called exemptions are just pretentious acts on the part of the State exercising UCMs to show it is bound by international human rights norms and to project a humanitarian face in the public. The conditions to be fulfilled by an individual and company to benefit from these exemptions are so demanding that discourage them in reality from doing any business with the targeted State under UCMs. The State exercising UCMs even may –and they do- try to deliberately impede, postpone or delay the complicated procedures for granting licenses and authorization which itself has introduced in seemingly exempted areas. It also should be noted that in many cases, individual, corporate or third States are so perceptive of the high risk of being punished by the States introducing UCMs, therefore, they refrain from entering into any business with the States targeted under UCMs, no matter if that business is related to humanitarian needs of vulnerable groups affected by Covid-19 pandemic or other areas.

37. On the other hand, even if these humanitarian related exemptions were fully implemented, some aspects of human rights would not be covered by them. For example, it is well recognized that UCMs have a very detrimental effect on the economies of the targeted States, and among other, destroy a considerable number of jobs. This, in turn, prevents -; individuals from enjoyment of certain rights, most notably the right to work which are protected under human rights instruments. In case of pandemic and public lockdown, individuals and the government need financial resources to implement measures of quarantine effectively, and to fund the maintenance of health care system during the pandemic and recovery from the crisis. By curbing the rate of employment and incomes both before and after the disasters, UCMs prevent the realization of these goals and thus violate human rights. The so-called de facto or would-be exemptions neither prevent, nor remedy or compensate such massive violations at all.

**VII. Does the mechanism of getting licenses for purchase of medical equipment, its component parts and software, medicines, protective kits, food and other essential goods provide for the possibility to guarantee vital needs of the population? Has it been eased by the sanctioning States in the course of pandemic?**

38. The mechanism of getting licenses for purchase of medical equipment, its component, parts and software, medicine, protective kits, food and other essential goods for the people in need, especially at the time of emergency proven to be totally ineffective. It certainly did not provide for the possibility to guarantee vital needs of the population affected in the Islamic Republic of Iran.

39. In line with its so-called inhumane policy of "Maximum Pressure", the sanctioning State never responds positively to the calls for waving or easing sanctions to facilitate provisions of vital needs of the affected population. Rather, it come up with more eloquent and well-paraphrased lip services pumped through a very well-orchestrated public diplomacy campaign to divert public opinion form its illegal unilateral coercive measures even during the course of recent pandemics in Iran. Furthermore, in practice the US exerted fresh sanctions to spearhead its notorious and arrogant policy of exerting "Maximum Pressure" against Iran. That policy and its inhumane and reckless application have adversely affected many aspects of human rights of the people in Iran and elsewhere. Apart from the pandemics, relevant officials and authorities experienced hard time during the rescue and search operations to receive international humanitarian assistance at the time of emergency, especially in the latest floods in the three provinces of Khuzestan, Lorestan and Sistan.

40. For further negative impacts of UCMs on healthcare system especially on getting licenses for purchase of medical equipment, its component parts and software, medicines, protective kits, food and other essential goods please refer to paragraphs14-31.

**VIII. Have you faced any problems in delivery of humanitarian aid in the course of COVID-19 pandemic? If yes, please, specify.**

41. We have faced many problems in delivery of humanitarian aid in the course of COVID-19 pandemic emanated from exertion of unilateral coercive measures. Illegal unilateral bans against our civil aviation and transport to purchase or maintain some specific parts for transport fleet including logistics and cargo planes and search and rescue helicopters could be highlighted here. Illegal and unlawful bans against SWIFT, banking channels and other banking and finance mechanisms have had negative impacts on pertinent national projects to facilitate smooth delivery of humanitarian aid to the affected people, as well as operation of expeditious search and rescue activities.

42. At a time when threats of the use of coercion or even armed forces are voiced, either in a veiled form or openly, in public addresses or in casual Twitter messages of President Trump or his authorities, not only their support in delivery of humanitarian aid is non-existent, but rather the continued relevance of Article 2 (4) of the Charter, which states that “All Members shall refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any state, or in any other manner inconsistent with the Purposes of the United Nations”, matters most to us. Thereby the Islamic republic of Iran holds the USA fully responsible and accountable for abrogating its humanitarian obligations in providing necessary assistance to keep and maintain our civil aviation and the transport fleet including logistic and cargo planes and search and rescue and logistic helicopters well-maintained, operational, and rolling in the course of COVID-19 pandemic or other natural or man-made disasters. The pertinent problems arise out of abrogation of its legal obligations within this context and compensations and remedies are subject of independent reports and follow ups.

**IX. Please, indicate what steps have been taken by the sanctioning States on one hand and in the targeted States on the other hand to alleviate possible human suffering caused by unilateral sanctions in the course of pandemic. What were the main obstacles created by sanctions to guarantee vital human needs and save lives in the course of pandemic?**

43. In times of crisis, any action to reduce the suffering of the people affected by sanctions must be accompanied by practical action and go beyond words and claims. These days, the United States has not only done nothing positive to alleviate the suffering, but has tried in various ways to exploit politics through illegal UCM action despite the announcement of humanitarian mechanism on 25 October 2019 or the General License 8. The most explicit non-constructive action by the United States is the recent move to ban Iranian researchers and physicians from accessing medical resources available on the National Library of Medicine (NLM) and Pubmed servers, especially during the pandemic, which clearly demonstrates the inhumane nature and the multi-pronged dimensions of the United States of America’s UCMs, particularly while the US claims that its unilateral coercive measures do not target the medical sector and the online comprehensive database.

44. Furthermore, the UCMs impose humanitarian costs implicitly as well; the US list of UCMs includes the actions of the Department of State, the Department of the Treasury, the Department of Commerce and the United States Department of Justice against the Islamic Republic of Iran and Iranian nationals. Since Donald Trump took the office, there have been a total of 137 UCMs or actions related to the implementation or guarantee of unilateral sanctions against the Islamic Republic of Iran, targeting the financial resources and income thereof. The UCMs targeting of Banking system, oil and services, including shipping insurance, pave the way for an adverse impact on life and welfare, and, most importantly, the health of all Iranian citizens, indirectly undermining their Right to Health and Right to Life, especially in the time of pandemic. For more information about the Trump administration's unilateral sanctions package against the Islamic Republic of Iran, please find the exhaustive list of that on official webpage of the issuing regime.

45. Contrary to US claims of exemption of medicine from the scope of the UCMs, due to the restriction imposed on financial transaction as well as non-cooperation of international banks with Iran, the purchase of medicine from foreign companies and importing to Iran is practically very difficult or even impossible. The issue of cutting off the Iranian government's revenues has been explicitly stated in the statements of US officials and the documents published by those government institutions. A clear example of this is the issuance of executive orders of 13871 and 13902, which explicitly targeted the revenue-generating industries of the public and private sectors or the wrongful and illegitimate designation of Central Bank of Islamic Republic of Iran under terrorism category on 20 September 2019.

46. However, in spite of all difficulties and barriers caused by the sanctions, successful efforts have been made to find ways to import medicine into the country to meet public needs. Besides, the Islamic Republic or Iran managed to reduce the mortality rate drastically due to extensive public health measures taken based on “the whole of State, whole of society” approach. In the first round, more than 78 million people were screened, using our strong PHC infrastructure, in a stepwise referral system, which resulted in dramatic reduction in hospital admissions. In the second round of screening, 22 million high-risk people were targeted. The Islamic Republic of Iran has expanded the laboratory capacities to outpatient clinics, focusing on contact tracing, isolation and early treatment and initiated ‘smart distancing’ to systematically reopen the businesses.

47. Furthermore, for the coronavirus patients, efforts have been made to meet the countries pharmaceutical needs; multiple cargoes of medicine have been imported into the country and efforts are underway to prevent problems and restrictions, although it has not been easy due to the uncertainty raised and fueled by the United States of America. As a response, Islamic Republic of Iran, thereafter, developed necessary resilience and expanded the domestic capacities to alleviate the suffering of the Iranians from COVID-19, intensified by UCM, by increase in production of test kits and necessary sanitary products including mask and alcoholic based sanitizing products. The abundance even enabled Islamic Republic of Iran to extend its humanitarian aids to several countries like Germany, Afghanistan and China.

48. The Islamic Republic of Iran also extended its assistance to the refugees and foreign travelers who pass the borders of Iran, and already provided due checkup and hospitalizations for nearly one million refugees in Iran and 1.5-2 million undocumented Afghans; they have access to free of charge primary health services in the time of pandemic, similar and equal to the host community. They also have access to free of charge COVID-19 related testing, treatment and hospitalization. This officially recognized by the ministry of foreign affairs of Islamic Republic of Afghanistan.

49. The former UN Special Rapporteur, Late Idris Jazayeri who made significant contribution to the matter, already in a statement dated 22 August 2018 noted, that “the current system creates doubt and ambiguity which makes it all but impossible for Iran to import these urgently needed humanitarian goods. This ambiguity causes a ‘chilling effect’ which is likely to lead to silent deaths in hospitals as medicines run out, while the international media fail to notice.” The suppliers faced the dual challenge of accessing non-sanctioned banking services and shortages of foreign currency in the Islamic Republic of Iran.

50. In the procurement process outside of Iran, many suppliers applied a self-restriction on delivery and transporting services to Iran. A clear example is the enforcement of UCMs on Islamic Republic of Iran Shipping Company on 8 Jun 2020, right at the middle of the pandemic. This would delay the procurement, shipment and deliveries of humanitarian goods to affected populations. More importantly time–sensitivity is inseparable part of deployment of humanitarian assistance, as the affected people are in dire need of receiving immediate humanitarian response. UCMs hamper the assistance and hence cause preventable loss of innocent people`s lives. Observing time saving elements such as non-barrier multimodal transportation, easy access to banking system, delivery of medicine, among others, are indispensable to deployment of humanitarian aids particularly at the time of emergency. The UCMs-or as they wrongfully prefer to call them sanctions- are indeed illegal, blind and indiscriminate, as they neither distinguish humanitarian emergencies from normal situations, nor do they differentiate ordinary people from the so-called targets.

51. The US has referred also to Swiss Humanitarian Trade Arrangement (SHTA). This channel works within the mechanism established in October 2019 with an enhanced Due Diligence and Reporting Expectations. SHTA and October 2019 mechanism by introducing an enhanced level of due diligence and reporting, first of all by compelling others to comply with US sanctions and secondly, by requiring several conditions (providing extensive information and assurances) is problematic rather than facilitating the humanitarian trade with Iran or removing impediments. This arrangement totally falls within the scope of U.S. sanctions and was established in order to ensure the full implementation of U.S. unilateral extra-territorial laws and legislations which are in violation of its specific and general obligations. In fact, the US has broadened its primary sanctions to the secondary sanctions. The U.S. sanctions regulations authorizing very restricted exceptions on humanitarian trade and such exceptions embodied in the SHTA. SHTA is of no meaningful use in essence since foreign financial institutions repeatedly refused to carry out Iran-related transactions even humanitarian transactions. The result is that international trade with Iran in necessary humanitarian and medical items and the financial and transportation associated services for such items are almost blocked. In fact, the U.S. so called exceptions on humanitarian trade and its instrument SHTA is aimed at precluding the moral and legal responsibility.

**X. What measures of international community do you consider to be vital to urgently enhance the ability of targeted states to resist pandemic?**

52. As earlier mentioned in response to the first question, and according to various resolutions of the UN General Assembly, the Human Rights Council and the Commission of Human Rights, unilateral coercive measures and legislations are contrary to international law, international humanitarian law, human rights law, the Charter of the United Nations and the norms and principles governing peaceful relations among States. Thereby the most urgent enhancement of the ability of targeted States to resist pandemics would be to fully uphold the above-mentioned commitments, everywhere and without any undue delay.

53. In that context, some measures may be taken by the international community as follows:

* To raise awareness about the disparaging consequences of UCMs on the enjoyment of human rights. Those who are proud to be mastering the art of sanctions should be truly identified as violators of human rights and killers of innocent patients and small children, in particular during pandemics;
* to condemn the inhuman, illegal and unlawful nature of the unilateral coercive measures/ sanctions and prohibit from giving any effect to those measures, taking into consideration the inherent illegality of those measures and enhance international cooperation to bring them to an end;
* To refrain from recognizing and implementing the UCMs, especially in a situation of pandemic which greatly exacerbates their already detrimental effects on the targeted States and populations and violates multiple human rights, the most important of which would be the fundamental right to life;
* To establish an effective mechanism to mitigating the impacts of UCMs and to appoint a UNSG’s Special Representative on UCMs and also establishing a compensation mechanism for victims of unilateral coercive measures could be elements of this new mechanism;
* To assist targeted States through provision of humanitarian commodities, as well as engaging in normal business with them so that those States would be able to acquire financial resources much needed to implement medical, quarantine and economic rehabilitation measures;
* The unlawful withdrawal of the United States of America from the Joint Comprehensive Plan of Action (JCPOA) and the unlawful imposition of its unilateral sanctions against the people and government of the Islamic Republic of Iran which is a clear violation of its obligations under international law should be strongly condemned and compensated. Most notably the multiple, continuous and grave cases of violation of the United Nations Charter, in particular Article 25 thereof, thereby jeopardizing the credibility and the integrity of the United Nations and threatening the maintenance of international peace and security.

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