

“E3 Snaps Back: Why Europe’s Tougher Stance on Iran Increases Risk for Global Business,” *Global Investigations Review*

Publications

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Partners Rachel Alpert and Rob Dalling co-authored an article for *Global Investigations Review* examining the E3's reimposition of UN sanctions against Iran and the compliance implications for global businesses navigating the newly aligned EU, UK, and US sanctions regimes.

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In late September 2025, the UK, France, and Germany invoked the "snap-back" mechanism under the Joint Comprehensive Plan of Action (JCPOA), reversing years of more lenient European sanctions policy. The E3 acted after Iran's uranium enrichment program reached 48 times the JCPOA limit and the country failed to cooperate with IAEA inspectors.

The reimposed sanctions include asset freezes targeting major Iranian entities and embargoes on conventional weapons and dual-use goods. While the UK government issued general licenses to permit limited wind-down activities, Rob and Rachel note these "carve-outs are a pragmatic nod to reality, but they won't shield unprepared compliance teams from OFSI scrutiny."

The authors emphasize that companies must act swiftly to assess exposures, wind down where needed, and strengthen compliance programs in response to the heightened sanctions landscape.

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