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Can Emerging Powers call the Shots? Brazil, Turkey and alternative Approaches towards Iran

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Abstract:

The Iranian nuclear programme is one of the top global security issues on the EU's and its member states' agenda. In order to make the Iranian authorities renounce to their in-country uranium enrichment projects, the Europeans have first developed their own diplomatic approach and then adopted three major rounds of sanctions between 2010 and 2012. The sanctioning approach has however been criticized by emerging powers such as Brazil and Turkey who engaged with Tehran and concluded a fuel swap deal in 2010. As the sanctioning policy adopted by the US and the EU remains criticized by emerging powers and in academia, the paper analyzes the development of the EU's policy towards Iran, the rationale of the Brazilian-Turkish initiative and exposes the reasons of the failure of this alternative approach. The paper concludes that although the limits of the sanctioning approach appear with increasing clarity, emerging powers such as Brazil and Turkey are unlikely to play leading role on the Iranian nuclear issue in the near future.

Introduction

The Iranian nuclear file is currently at the top of the world's major powers' security agenda. The relations between Iran and the US have been extremely strained since Iran's Islamic revolution of 1979 and the Europeans have long played a bridging role between the two foes. The EU's role has been enhanced when it started to chair the E3+3 group (P5+ Germany) which deals with the Iranian nuclear programme in the name of the international community. The nature of the EU's role as the link between Iran and the international community has progressively changed with the adoption of increasingly coercive policies by the EU big three (France, UK, Germany) in response to Iran's radicalisation after 2005 and the election of Mahmoud Ahmadinejad as president. In 2010, the EU adopted its first main round of sanctions against Iran thereby aligning on the US policy.

The row between Iran and the international community over its nuclear programmes relates to the mistrust between both sides. While Iran, a signatory of the Non Proliferation Treaty (NPT), insists that its rights under the treaty to develop peaceful nuclear technology should be respected, including enrichment of uranium activities, the US, the EU and to a lesser extent other world powers do not trust Iran's words but ask for full transparency. The West's mistrust is fuelled by the fact that Iran has developed covered nuclear activities without informing the International Atomic Energy Agency (IAEA) as it should have under the NPT. Between these two antagonistic positions, emerging countries such as Turkey and Brazil have developed a different vision of the issue based on their understanding of how the new world order should look like. While they are opposed to nuclear proliferation, they also oppose the Western sanction-based approach. In May 2010, acting as a bridge between the two sides, they negotiated directly with Tehran a nuclear fuel swap deal aimed at building trust and confidence. The deal was dismissed by the US and the other members of the E3+E group as it did not address their main requirements.

Against this background, the paper questions the role that emerging powers such as Brazil and Turkey can play on the Iranian nuclear issue and what this means for the EU. Focussing mainly on the political dimension of the issue¹, it is divided into three main parts. The first one analyzes the evolution of Europe's policies towards Iran and the factors leading to the

¹ The paper will punctually refer to technical (IAEA) and legal (NPT) dimensions of the issue to illustrate the main arguments.

implementation of EU sanctions. The second one analyzes Brazil's and Turkey's changing perceptions of the world order and how it materialized through the 2010 deal. It concludes that the two countries currently have a capabilities-ambitions gap on this sensitive issue. The third part compares the EU's and Turkey's policies and draws some conclusions of the shortcomings of the sanction-based approach in light of recent analysis of the sanctions' impact on the Iranian leadership.

I. Europe and Iran: the way to the sanctions

This section briefly reviews the history of European-Iranian relations and analyzes the aims of the sanctions and the factors that led to their adoption by the EU.

1.1 Historical background

Following the Iran-Iraq war (1980-1988) during which most of the European countries sided with Saddam Hussein's Iraq, the European Union embarked into a more favourable policy towards Iran as it seemed increasingly difficult to look away from a key actor in the Middle-Eastern region, both in geopolitical and economic terms.² Shortly after having agreed upon the creation of a new Common foreign and Security Policy (CFSP) in Maastricht, the European Council decided at the Edinburgh Summit in December 1992 to 'break the diplomatic ice' and start formal relations with Tehran. This was made possible by President Rafsanjani's need to bring about post-revolutionary normality and post-war stability to its country. Given the tumultuous relations since the 1979 Iranian revolution however, the EU's offer consisted of a 'Critical Dialogue' rather than of a trade agreement, whereby all the problematic issues, including the question of human rights, would be addressed in priority. Despite heavy pressure from the US and Israel and criticism in Europe, the relations towards Iran were maintained and the EU did not follow the US sanctions enacted against Iran through the 1996 d'Amato-Kennedy Act.³

² For a detailed account of the history of Europe-Iran relations, see Posch, Walter, 'The EU and Iran', in Biscop, Sven and Whitman, Richard G. (Eds), *The Routledge Handbook of European Security*, London, Routledge, 2013, p. 179-181.

³ Dufays, Nicolas, 'Les relations de l'UE avec la République islamique d'Iran: enjeux, perspectives et perceptions', in *L'Iran et les grands acteurs régionaux et globaux*, Makinsky, Michel (Ed.), Paris, L'Harmattan, 2012, p. 421.

This first attempt to establish relations with Iran did not survive a German court decision in April 1997⁴ which infuriated the Iranian leadership and led European Member States to pull out their ambassadors. The diplomatic crisis was overcome by the election of the reformist Khatami to the Presidency the same year, which boded well for the future of the dialogue. The new 'Comprehensive Dialogue' allowed for the regular meetings at the level of under-secretary of state while working groups were established to deal with sectorial issues. On the basis of a Communication⁵, the EU offered negotiations on a Trade and Cooperation Agreement combined with progress in the Political Dialogue while a Human Rights Dialogue was also set up. Consequently, the years until 2002 were marked by hopes on the European side that under the leadership of Iranian reformists, dialogue and negotiations with the EU could yield progress both at economic and political level. The discovery of an Iranian nuclear site in Natanz 2002 however broke this dynamic and since then, the nuclear issue has taken precedence over all the other issues and represent one of the main challenges in the EU-Iranian relations.

In the autumn of 2003, the EU Big Three (France, Germany and the United Kingdom) started their diplomatic activity by sending their ministers for Foreign Affairs to Tehran in order to convince the Iranian leadership to sign the additional protocol to the NPT and to abandon uranium enrichment. Shortly after, Javier Solana, the Council Secretary General and High Representative of the EU for Foreign and Security policy, was added to the team. Henceforth, the EU would negotiate in the E3/EU format, thus including all EU member states in the process. An EU negotiation offer was put forward in 2005 but forcefully rejected by the Iranians, arguing that their inalienable right to enrich uranium (which they had only suspended and not stopped in 2003/4) and security guarantees were not included in the proposal. These arguments have since then been the core of the Iranian position.

While the multilateral sanctioning policy started after the Iranian nuclear file was transmitted by the IAEA to the UNSC in 2006 (see below) and a package deal endorsed by the E3+3 (the three Europeans, USA, Russia and China - also called P5+1, chaired by the EU HR) rejected by Iran, a final comprehensive offer was made by the E3+3 in June 2008 but

⁴ The so-called Mykonos Affaire on the involvement of Iranian officials in terrorist activities in the Berlin in the 1980's.

⁵ Commission of the European Communities, *Communication on EU relations with the Islamic Republic of Iran*, Brussels, COM(2001) 71 final, 2001.

was again rejected by the Iranians. This was the last episode in which the EU played a substantive role in the negotiations. After the election of Barack Obama in November 2008 and the increasingly repressive development of the Iranian regime following the contested Presidential elections of June 2009, the EU's role mainly consisted of chairing successive rounds of meetings in Geneva (October 2009 and December 2010), Istanbul (2010, 2011 and 2012), Bagdad (2012) and Almaty (2013), none of which produced a constructive outcome. This rather disappointing diplomatic track was however accompanied by an increasingly severe set of economic sanctions adopted in the UN framework and sharpened at the EU level after 2010.

1.2 Aims of the sanctions

The sanctioning policy follows a certain number of key objectives which are important to identify in order to discuss the success of the policy and the critics emanating from emerging powers. The first main aim is to raise the costs of the pursuit of Tehran's current policy and to change Iran's nuclear calculus.⁶ By inflicting severe difficulties to the Iranian economy, it is expected that the population will start protesting and that some sectors of the Iranian the society (business community) will start rifting whereby threatening the stability of the regime. As a consequence, this situation should lead key internal stakeholders to push to get back to the negotiation table and force Iranians to make reasonable concessions. Another important aim of the sanction is to provide a cover for those in Washington and Brussels who don't want a military strike to take place. By implementing tough sanctions, hardliners are prevented from arguing that the West is too lenient. In this sense, sanctions are presented as the only option against an Israeli and/or US military strike. In Tehran, sanctions can be used by those who are more in favour of a détente, by pointing at the detrimental consequences of the hardliner's choices. A third important aim of the sanctions is to provide political signalling at home for constituencies and abroad to discourage other countries to follow the Iranian path. Finally, the last important aim of the sanctions lies in the fact that they are the only real multilateral policy

⁶ Bijan Khajepour, Reza Marashi and Trita Parsi, "Never give in and never give up", *National Iranian American Council*, March 2013, pp. 10-11.

that can be agreed upon by the P5+1. As such, they remain an important tool to guarantee cohesiveness among the world powers of the UNSC.

1.3 Factors leading to the EU's sanctioning policy

Sanctions against Iran have first been adopted unilaterally by the US.⁷ In 2006, the first round of sanctions was adopted at UN level through the UNSCR 1696, which enjoined Iran to stop its enrichment activities. Following Iran's negative reactions, the UNSC adopted several further rounds of sanctions against Iranian economic entities and individuals related to the enrichment and reprocessing industry.⁸

Prior to 2010, the EU's role in sanctions towards Iran was limited to enforcing sanctions decided at the UN level, the last round of which was decided through the UNSCR 1929 of 9 June 2010. After 2010 however, the EU passed three rounds of sanctions of variable reach and intensity. The first was adopted in July 2010 and prohibits European investments in the Iranian oil and gas sector as well as in the various activities related to LNG. Financial and trade restrictions were also included in the Council Decision.⁹ The second round, arguably the most important one, was adopted in January 2012 and installed an oil embargo on Iran and prohibited financial and commercial activities for petrochemical products. Bank assets were frozen and precious minerals excluded from authorized trade. The sanctioning Council decision was adopted after the IAEA issued an alarming report in November 2011 regarding Iran nuclear activities relating to the potential development of a military programme. The third and last round of sanctions was passed in October 2012 and prohibited the import and transport of Iranian natural gas (a rather symbolic measure), the trade of industrial software, naval equipment, a ban on transactions... The list of Iranian individuals (150) and entities (490) banned from entering the EU territory has been regularly expanded. The next

⁷ US unilateral sanctions started after the 1979 hostage crisis and were sharpened during the Clinton administration with the Iran-Libyan Sanction Act of 1996 (ILSA).

⁸ Resolutions 1737 and 1747 in 2007, 1803 and 1835 in 2008 and 1887 in 2009.

⁹ Ruairi Patterson, "EU Sanctions on Iran: The European Political Context", *Middle-East Policy*, vol. 20, no.1, Spring 2013, p. 135.

step would now consist of a full trade embargo, which remains a taboo in the EU but is nevertheless discussed behind closed doors.¹⁰

While the Europeans forcefully opposed the US unilateral and extraterritorial¹¹ sanctioning policy in the 1990's and early 2000's, a number of factors have reversed the European approach after 2003. Internally, the shift in the EU's policy can be explained by political changes in the EU big three. Sarkozy (2007) and Merkel (2005) were both more Atlantist than their predecessors while the relative absence of the German MFA Westerwelle left more space for Merkel.¹² In the UK, while Prime Minister Blair had been a staunch supporter of the US's hawkish Middle-Eastern policies, the replacement of MFA Straw by Beckett in 2006 marked the end of a certain understanding of Iranian interests and needs in the UK government.¹³ On the other hand, Southern member states traditionally sceptical towards the sanctioning approach (Greece, Cyprus, Spain, Portugal) have seen their influence marginalised by the economic and financial crisis which diminished their ability to hold strong positions on security matters while they urgently needed their counterpart's approval for financial support. This is particularly true for Greece who had preferential agreements for Iranian oil and nevertheless accepted the January 2012 round enforcing an oil embargo on Iranian exports.¹⁴

External factors such as the discovery of hidden plants (Natanz 2002, Arak, Fordow 2009), the election of the Mahmoud Ahmdinejad as president in 2005 and the subsequent resumption of enrichment activities, talks about US and Israeli military strikes and Obama's 2009 attempt to engage Iran whereby showing a certain understanding for some Member states' scepticism towards a coercive approach along with the overall pressure put by the US on the Europeans to bolster their sanctions have all contributed to the shift in the EU's policy.

¹⁰ Ibid. p. 136.

¹¹ Sanctions applied to non-US companies doing business in the oil and gas sector. Europeans threatened to bring the case to the WTO but the row was finally resolved through broader diplomatic deals and no European company was sanctioned. See Ruairi Patterson, op. cit. p. 137

¹² Patterson, op. cit. p. 141.

¹³ Ruth Hanau Santini, "European Union discourses and practices on the Iranian nuclear programme", *European Security*, Vol. 19, no. 3, 2010, p. 484.

¹⁴ Patterson, op. cit. p. 142.

American pressures have been of diplomatic and economic nature, the latter with a decisive impact on the Europeans because it affects them at various levels whereas the diplomatic pressure is only 'agency-oriented' i.e. directed towards the key foreign policy makers. Through the increasingly tight net of unilateral and extraterritorial sanctions decided after 2010¹⁵ the US policy makers managed to "reduce the appetite of non-US banks for Iran-related business".¹⁶ The development of such a tight web of sanctions and its deepening (the President's ability to use waivers has been reduced and the automaticity of sanctions increased) has therefore left the European with little a very limited room for manoeuvre. Linked to that is the fact that the subsequent deterioration of the general business and investment climate with Iran has made the implementation of sanctions less costly for the Europeans.¹⁷ This fact may have translated into lower resistance from European businesses towards planned EU sanctions. Therefore, even without the formal adoption of EU sanctions, European businesses would have largely contributed to the US sanctioning system and the alignment on the US policy by the EU provided important diplomatic gains with a limited economic and internal political impact.

Against this backdrop, it appears that the European policies towards Iran have progressively aligned with the US sanctioning approach although US pressure has not been the only factor in this shift. What remains however, is that the EU has no substantive room for manoeuvre when dealing with Iran.

II. Turkish and Brazilian diplomacies towards Iran: the capability-ambitions gap

This section aims at analysing the foreign policy of Turkey and Brazil towards Iran in general and the nuclear file in particular in order to understand the reasons that lead emerging powers to adopt a different approach on this issue. Turkey and Brazil have gained some fame with the 2010 Tehran declaration when they negotiated a swap deal with Iran. In order to understand why these two countries engaged diplomatically thus far with Iran, it is

¹⁵ Such as the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA) signed into law by Obama in July 2010 and updated the ILSA which had previously renamed ISA under the Bush administration; sanctions contained in the National Defense Authorization Act (NDAA) 2011; the Threat Reduction and Syria Human Rights Acts. See Bijan Khajepour et al, op. cit. pp. 9-10.

¹⁶ Patterson, op. cit. p. 137

¹⁷ Patterson, op. cit. p. 142-143.

important to take into account the characteristic of their changing (changed) foreign policy. Both countries face important dilemmas and tensions in their foreign policies as emerging powers and their policies towards the Iranian nuclear file concentrates these contradictions. The following sections will analyse these tensions, provide explanations on the 2010 deal and question the sustainability of both countries' approach in a context where the security stakes for Western powers are extremely high.

2.1 Turkey's new regional policy: trade and 'de-securitisation'

The rise of the Iranian nuclear file issue on the global security agenda coincided with the development of Turkey's 'new' foreign policy. Shortly after the AKP's first electoral victory in 2002, Turkey started to develop a more inclusive foreign policy towards its neighbours, on the basis of Ahmet Davutoglu's reflexions of Turkey's 'strategic depth'¹⁸. Davutoglu's appointment as chief advisor to the Prime Minister on foreign policy in 2003 and as Minister for foreign affairs in 2009 had an important impact on Turkey's foreign policy as it allowed him to implement his conceptual reflections around Turkey's place and role in its regional environment. Those revolved around the geographical and historical depths that Turkey enjoys thanks to its location and its ottoman past: "The 'strategic depth' doctrine calls for an activist engagement with all regional systems in Turkey's neighbourhood".¹⁹ The doctrine also aims at setting the guidelines for Turkey to transform from a peripheral state as it used to be in the Cold War to a central state in the post-Cold War era.²⁰ Albeit the "strategic depth" doctrine is undoubtedly Davutoglu's brainchild, it must be recalled that the AKP's foreign policy implemented from 2002 onwards owes a lot to the orientations adopted by the previous government and particularly to the minister of Foreign affairs of that time, Ismail Cem. The latter intended to develop Turkey's foreign policy by resorting to five key

¹⁸ Ahmet Davutoglu, *Stratejik Derinlik: Türkiye'nin Uluslararası Konumu* [Strategic Depth: The International Position of Turkey] (Istanbul: Küre Yayınları, 2001).

¹⁹ Alexander Murinson, "The Strategic Depth Doctrine of Turkish Foreign Policy," *Middle Eastern Studies*, vol. 42, no. 6, 2006, p. 948.

²⁰ Ahmet Sözen, "A Paradigm shift in Turkish foreign Policy: Transition and Challenges", *Turkish Studies*, vol. 11, no. 1, 2010, p. 110.

assets of Turkey: history, culture, a booming economy, domestic stability and the Turkish model itself.²¹

Although Turkey's interest for its geographical and historical neighbourhood (the Balkans, Caucasus, Middle East and Central Asia) is not new²², two further important reasons fostered Turkey's engagement towards the Middle-East in the 2000's. The first is that the Turks understood that sticking to the US's requests might run afoul of its primary security concerns. The 1991 Gulf war had negative consequences for Turkey as it destabilised the region. In 2003, the Turkish Parliament opposed the invasion of Iraq as the war was perceived as unjustified and detrimental to Turkish security interests. Turkish air bases and facilities were not made available for the military forces of the American led coalition. The second relates to the disappointments provoked by the EU's reluctance to keep the membership perspective after 2007 and the French presidential election. These events pushed Turkish leaders to further develop the opening to its neighbourhood.

Against this framework of re-engagement with its neighbourhood, it has been claimed that one of Turkey's objective has been to develop a system of increasing interdependence with its neighbours whereby national security concerns of the regional actors cannot be analysed or resolved independently.²³ This objective of creating a 'security complex' is interestingly not far away from what the EU has been doing through the process of European integration and what it still continues to do at its frontiers: the development of a security community.²⁴ The development of this inclusive set of policies at the regional level has been accompanied by a process of 'de-securitisation' whereby issues in the relation between Turkey and Iran have been moved "off the 'security' agenda and back into the realm of public political discourse and 'normal' political dispute and accommodation".²⁵ The process was brought

²¹ Nathalie Tocci, Elena Maestri, Soli Özel and Serhat Güvenç, "Ideational and material power in the Mediterranean: the role of Turkey and Gulf Cooperation Council", *Mediterranean Paper Series 2012*, German Marshall Fund, June 2012, p. 12, footnote 38.

²² For a literature review on the origins of Turkish 'neo-ottomanism', see Ahmet Sözen, op. cit. pp. 106-110.

²³ Özden Zeynep Oktav, "Regionalism or Shift of Axis? Turkish-Syrian-Iranian Relations", in Ö.Z. Oktav, *Turkey in the 21st Century, Quest for a New Foreign Policy*, Farnham, Ashgate, 2011, p. 75.

²⁴ On the security dimension of European integration, see Vincent Laporte, *The European Union – an Expanding Security Community?*, EU Diplomacy Paper no 6, Bruges, College of Europe, August 2012.

²⁵ Michale C. Williams, "Words, Images, Enemies: Securitisation and International Politics", *International Studies Quarterly*, vol. 47, no. 4, p. 523, cited in Bülent Aras and Rabia Karakaya Polat, "From Conflict to Cooperation: Desecuritization of Turkey's Relations with Syria and Iran", *Security Dialogue* 39, no. 5, 2008, p. 498.

about by events such as the EU membership negotiations which diffused in Turkey new norms regarding the management of international relations based on negotiations (Europeanisation), internal political changes (the AKP since 2002) and the emergence of a new foreign policy line aimed at building lasting stability for Turkey and its neighbours (zero problems with the neighbours).

2.2 Trade and de-securitization in Turkish-Iranian relations

Although the 'de-securitisation' dynamic described above was not limited to Iran, it was particularly salient in the case of the nuclear file given the importance of the issue at world stage and paralleled the deployment of Turkey's new foreign policy. From a discourse analysis perspective, the various comments and declaration made by Turkish officials show that Turkey's aim was clearly to make the nuclear issue leave the security domain. Prime Minister Erdogan stated in 2009 that "there is no doubt that [Ahmadinejad] is our friend" and called Iran's nuclear military program "just gossip".²⁶ Regarding the NATO's missile shield, Ankara pushed to avoid labelling Iran and Syria "threats"²⁷ and on the Iranian nuclear issue, Turkish officials' declarations have consistently emphasized the nuclear nature of the programme and the need to find a diplomatic and negotiated solution.²⁸

These declarations occurred during a period when bilateral contentious points were progressively resolved. Accusations of political interference²⁹ from Iran into Turkish politics that were made regularly by nationalist and secular politicians and member of the kemalist establishment during the 1990's and the accusations of Iranian support to the PKK progressively faded away as the new Turkish foreign policy started to be implemented. At

²⁶ Quoted in Özden Zeynep Oktav, op. cit. p. 82.

²⁷ Ibid. p. 84.

²⁸ The Turkish Permanent Representative to the IAEA stated in 2012 that "Turkey supports the settlement of the [nuclear programme] through diplomatic ways and we continue to work to facilitate dialogue and cooperation", quoted in Anthony H. Cordesman, Bryan Gold, Robert Shelala, and Michael Gibbs, "US and Iranian Strategic competition, Turkey and the South Caucasus", *Centre for Strategic and International Studies*, February 2013, p. 43.

²⁹ Such as during the 'Baqeri' (name of the Iranian ambassador) – also called 'Sincan' (area in Ankara) - crisis in 1997 where the diplomat was accused of supporting Islamist law at a an Islamists' rally, leading to the psto-modern coup d'Etat and the stepping down of Islamist Prime minister Erdogan. Or during the 'Kavakçi affair' in 1999, when a female MP wore the headscarf in the Grand Assembly and was accused by President Demirel to be an agent provocateur working for Iran. See Bülent Aras and Rabia Karakaya Polat, op. cit. pp. 505-506.

the same time, Turkish-Iranian trade relations started to grow considerably. The volumes exchanged have increased by 1.575% between 1995 and 2011³⁰ and Iran was Turkey's 6th trading partner in 2011, although the structure trade is skewed towards Iran due to the important oil and gas exports.³¹

2.3 Turkey's non-proliferation policy and the Iranian nuclear programme

Turkey's 'de-securitization' efforts of the Iranian nuclear programme follow the Turkish position on non-proliferation. Turkey has a clear non-proliferation policy, has signed (1969) and ratified (1980) the NPT and the Additional protocol (2000) giving the IAEA increased power to check undeclared nuclear activities. However, Turkey also defends a strict interpretation of article IV of the NPT which stipulates that any signatory has the right to develop civilian nuclear activities and is working with Russia and Japan to develop facilities in Turkey.³² Therefore, sanctions against Iran represent a potentially dangerous precedent for any non-nuclear weapons state willing to develop civilian activities. This stance should not be interpreted as a potential interest for developing a military programme. Its NATO membership covers it from external threats (article 5) whereas the EU membership process has also tied, at least potentially given the pace of negotiations, Turkey into the EURATOM treaty provisions which only allows civilian nuclear use.³³

Against the background, the Turkish foreign policy position towards Iran since 2002 has been characterised by non-interference, good neighbouring relations and economic and security cooperation. In 2009, Turkey's involvement has evolved from a facilitator to mediator. While Turkey has consistently argued against the sanctioning approach, this does not mean that Turkey favours a nuclear armed Iran. To the contrary, Turkey is committed to avoid any development that could threaten regional stability and a nuclear Iran would potentially start a dangerous arm race in the Middle-East. The difference with the US and

³⁰ Kemal Kirişçi, "The EU, Turkey, and the Arab Spring: Challenges and Opportunities", *Global Turkey in Europe*, Working Paper no. 1, November 2012, p. 10.

for Regional Integration

³¹ H. Cordesman et al, op. cit. p. IV.

³² Aylin Gürzel, "Turkey's role in Defusing the Iranian Nuclear Issue", *The Washington Quarterly*, Summer 2012, p. 143.

³³ Ibid.

Europeans relates first on the belief towards the Iranian motivation: the Turkish leadership claims that the Iranians should be more trusted. Second, regarding the means to prevent a potential nuclear Iran, Turkey claims that a coercive sanction-based approach is counterproductive as it encourages confrontational behaviours.³⁴

2.4 Brazilian foreign policy towards Iran

As an emerging power of the BRICS and IBSA groupings, Brazil has gained an increasing influence at world stage over the last twenty years. The economic clout that Brazil has acquired is however not reflected in the country's influence in the international organisations that structure international relations at global level in various sectors such as finance, trade, environment or security. Consequently, Brazil acts as a 'contesting' power and has developed policies that challenge the established international order. The contesting dynamic is however framed by the necessity to keep some international credibility and good relations with the dominant powers, notably the US and the EU, as Brazil precisely strive to become part of the club of world powers. Therefore, Brazil's foreign policy navigates between these two imperatives and the relations with Iran are a good illustration of this tension.

As regards the global security governance, an important dimension of Brazil's foreign policy has consisted in questioning the selectivity of international organisations. Brazil's scepticism towards the authority and legitimacy of the UNSC, norms of liberal interventionism and majoritarian decision-making was fuelled by the perceived selective defence of human rights, humanitarianism and interventionism developed by Western power with (or without) the ascent of the UNSC.³⁵

Brazil has developed over the last twenty years a foreign policy based on principles such as negotiation and multilateralism and follows a legalist tradition. Under President Cardoso

³⁴ Sinan Ülgen, "The Turkish Model for Transition to Nuclear Power The Security Dimension of Turkey's Nuclear Program: Nuclear Diplomacy and Non Proliferation Policies", in "The Turkish Model for that Transition to Nuclear Power," *Ekonomi ve Dis Politika Arastirma Merkezi (EDAM)*, December 2011, p. 159.

³⁵ Matthiew David Stephen, "The Issue-Specific Approaches of Rising Regional Powers to International Institutions: The foreign policy orientations of India, Brazil and South Africa", *Paper prepared for the ISA Asia-Pacific Regional Section Inaugural Conference, Brisbane, Australia, 29-30 September 2011*, p. 26.

(1995-2002), Brazil adopted the principle of “autonomy through participation” whereby Brazil would seek to engage its international partners in full respect of the states’ sovereignty thus showing a “constructive moderation” in world affairs.³⁶ Against this background, Brazil’s foreign policy objectives can be summarised as aimed at shaping an international order that respects sovereignty, provides flexibility and guarantees autonomy.

Under President Lula (2003-2010), Brazil’s foreign policy further emphasised the notion of leadership through diplomatic action while still adopting an approach based on consensus and dialogue. Other important objectives of Brazilian foreign policy became first the reduction of the dependency towards stronger nations, second the reduction of asymmetries in the world order and third introduce more flexibility between weak and strong states.³⁷ This could be done via regional engagement, notably with Argentina, Venezuela and Bolivia but also via punctual and specific engagement such as in the 2010 Tehran Declaration case.

Brazil’s motivation to strike a deal with Iran is fourfold.³⁸ First, as a candidate for a permanent seat at the UNSC, Brazil wanted to demonstrate its credentials as an active contributor to a major international disagreement settlement. Second, the move was justified by Brazil’s reluctance towards the sanctions approach, which also affects its commercial interest. Third, the diplomatic initiative was consistent with Brazil’s objective of providing more flexibility and autonomy for non-Western countries in the international architecture. The fourth explanation to Brazil’s initiative relates to its non-proliferation policy. As in the case of Turkey, Brazil – who is a threshold state, defined as having enough scientific and material capabilities to make nuclear weapons but has refrained to do so³⁹ - is a staunch defendant of NPT signatories’ rights to access to nuclear technology for civil purposes. The 2010 deal was therefore an important signal given to the world that Brazil defends the right to develop nuclear technology, including enrichment programmes, free from external pressures. Besides, albeit a NPT signatory (1998), Brazil refused to sign the

³⁶ Diego Santos Vieira de Jesus, “Setting fire to the rain: Brazil’s strategic postures, goals and perceptions towards Iran”, in Michel Makinsky (ed.), *L’Iran et les grands acteurs régionaux et globaux*, Paris, L’Harmattan, 2012, pp. 359-360.

³⁷ Ibid. p. 361.

³⁸ Diego Santos Vieira de Jesus, “Building Trust and Flexibility: A Brazilian View of the Fuel Swap with Iran”, *The Washington Quarterly*, Spring 2011, pp. 61-75.

³⁹ In Brazil’s case, the political choice of disarmament is enshrined in the Constitution which explicitly forbids the manufacture or possession of nuclear weapons. Maria Rost Rublee, “The Threshold states, Japan and Brazil” in Tanya Ogilvie-White and David Santoro, *Slaying the nuclear dragon*, Athens, Georgia, University of Georgia Press, 2012, p. 154.

Additional Protocol which is seen as too permissive regarding the secrecy and safety of information about its technology.⁴⁰ Furthermore, Brazil has consistently put forward that intrusive inspections of non-nuclear weapon states are unacceptable as long as nuclear-weapons states fail to seriously pursue their disarmament promises.⁴¹

2.5 The failure of the 2010 Tehran declaration and the future role of emerging powers

The energetic diplomatic activity of Turkey and Brazil culminated with the 2010 Tehran Declaration. The plan agreed upon by Tehran foresaw that Iran would be provided with 20% enriched uranium for its Tehran Research Reactor in exchange of 1,200 kg of low enriched sent in Turkey.⁴² Although the deal started to be negotiated in the wake of Obama's early opening towards Iran in 2009 and followed a similar project prepared by the Vienna group⁴³ in 2009, the deal was dismissed by the US and the Europeans, chiefly because it did not address the question of Iran's enrichment capabilities, which is fundamental for the Westerners. From the Turkish side, the deal was considered a major success and served the purpose of defending the autonomy of the non-nuclear weapons states as well as Turkey's ambition to profile itself as an order-setter for the region.⁴⁴ In Brazil, the deal was also considered a major breakthrough as it provided some space for dialogue which was lacking. A South-South initiative aimed at defending autonomy from the North while attempting to settle an important issue for the West, the deal was seen as an important confidence-building measure paving the way for further diplomatic activity.⁴⁵ The Turkish and Brazilian efforts were nevertheless annihilated by the UNSC resolution 1929 voted in June 2010 which further increased multilateral sanctions against Iran. Both Turkey and Brazil, UNSC members at that time, voted against the resolution.

In retrospective, it seems that Brazil and Turkey have "burned their hands" with this diplomatic move and have reached the limits of independent foreign policy when security

⁴⁰ Ibid. p. 71.

⁴¹ Maria Rost Rublee, op. cit. p. 155.

⁴² "Joint Declaration by Iran, Turkey and Brazil on Nuclear Fuel, May 2010", 17 May 2010, *Council on Foreign Relations*, accessed 16 April 2013.

⁴³ US, France, Russia, IAEA.

⁴⁴ Nathalie Tocci et al, op. cit., p. 14.

⁴⁵ Diego Santos Vieira de Jesus, "Building Trust and Flexibility...", op.cit.

stakes are high for Western powers. Two explanations can be provided to explain the failure. First, Turkey and Brazil have miscalculated the positions of major stakeholders, notably Russia and China, who voted with the Westerners the 1929 UNSCR. Another explanation is that the US administration accepted to give the negotiation track a chance and supported Brazilian and Turkish negotiators. However, the high pressures put on Obama to adopt a firmer stance led him to change the strategy and work towards a UN sanctioning resolution while letting the Turkish-Brazilian initiative move ahead.⁴⁶

The consequence of the failure is that both Turkey and Brazil have and will abstain from taking initiatives on the dossier as they have seen that they cannot challenge the Western system of sanctions. For Turkey, the relation with Iran has also soured due to the Syrian crisis which takes an increasingly confessional dimension. Both countries have irreconcilable positions on the outcome of the crisis: while Turkey supports the rebellion, Iran is still strongly backing the regime of Bashar al-Assad. The installation of NATO defence missiles in Southeast Turkey has further strained the relationship.⁴⁷ However, this does not mean that Turkey has “aligned” on the Westerners’ position regarding the nuclear programme. Turkey simply implements UN sanctions as they have the UN legitimacy but does not go beyond.⁴⁸ While the US extraterritorial sanctions have led some large Turkish companies to avoid trading with Iran, business between the two countries is still substantive. The Turkish state-owned Halkbank was reported to have purchased Iranian gas with Turkish Liras that were used to buy gold, which was in turn shipped to Iran via Dubai while there is still an important number of Iranian companies operating on Turkish soil, possibly to circumvent Western sanctions.⁴⁹

For Brazil, the reasons of the disengagement are different. First, Middle-Eastern issues are far away from the countries’ security concerns. In that sense, the 2010 engagement was ‘optional’ and Brazil does not have any strong incentive to challenge the Western policy given the cost that this entails. Furthermore, Dilma Rousseff who followed Lula as President of Brazil in 2011 is more concerned by human rights issues and has indicated that she

⁴⁶ Interview with a senior Turkish diplomat, Turkish permanent representation to the EU, Brussels, 19 April 2013.

⁴⁷ Philipp C. Bleek and Aaron Stein, “Turkey and America face Iran”, *Survival: Global Politics and Strategy*, vol. 54, no.2, March 2012, p. 34.

⁴⁸ Sinan Ülgen, op. cit. p. 158.

⁴⁹ H. Cordesman et al, op. cit, p. 30.

wanted her country to adopt a tougher stand towards Iran's poor records.⁵⁰ This obviously leaves less space for negotiating and building trust with the leadership in Tehran.

Despite the failure of the 2010 Tehran declaration, Turkey and Brazil have shown signs that although their policy choices towards Iran could not be currently implemented, it was important to keep thinking alternatively to the sanctions approach. During the last UNGA in New York in September 2012, they teamed up with Sweden to promote the vision that international conflicts should be resolved through diplomacy and negotiation rather than through violent and military methods.⁵¹ This dynamic was rekindled in January 2013 when the minister for foreign affairs of the three countries gathered at Izmir for Turkey's Fifth Annual Ambassadors' Conference and decided to set up the Trilateral Solidarity for Building Peace. According to Minister Davutoglu, the three countries share the same approach of foreign policy-making and the diplomatic platform should help to develop common "perspectives on regional and global issues."⁵² Such an initiative however is unlikely to have a significant impact on the current policies followed by the world powers on Iran but nevertheless demonstrate Turkey's and like-minded countries' willingness to create diplomatic channels to work on diplomatic solutions.

III. EU-emerging powers relations on the Iranian nuclear file and the way ahead

This section shows that although the Turkish-Brazilian initiative did not have an impact on the EU's policy choices, a critical assessment of the current sanctioning policy points to the limits of such an approach and for the need to think along different lines.

3.1 Impact of alternative diplomacies on the EU's policies

As such, the Turkish-Brazilian diplomatic initiative did not have an impact on the EU's approach. The EU, driven by the big 3, adopted its first round of sanctions in July 2010

⁵⁰ Diego Santos Vieira de Jesus, "Setting fire to the rain...", op. cit. p. 366.

⁵¹ Nicolas Bourcier, « Le Brésil, la Turquie et la Suède veulent peser plus dans le dossier iranien », *Le Monde.fr* 28 September 2012, accessed: 14 November 2012.

⁵² Sevgi Akarçesme, "Turkey, Sweden, Brazil form Trilateral Solidarity for Building Peace", *Today's Zaman online*, 5 January 2013, accessed 23 April 2013. <http://www.todayszaman.com/news-303189-turkey-swedenbrazil-to-form-the-trilateral-solidarity-for-building-peace.html>

shortly after the Tehran declaration, which shows that the sanctioning option was already on the table while Turks and Brazilians were negotiating with Iran. More fundamentally, one can note that the policy evolution in Turkey and the EU have gone in the opposite directions over the last decade. In the EU, three different discourses towards Iran (sometimes competing and sometimes overlapping) calling for different policies have been identified.⁵³ The first one relates to the image of Iran as an untrustworthy, unpredictable and thus dangerous country in foreign policy. The second one emphasizes the authoritarian nature of the Iranian and stresses the human rights violation. The third discourse relates to Iran as a country with rights (to civilian nuclear power) and resources (needed by the EU). While the three discourses were relatively balanced until 2005, the EU started to harden its discourse as of the election of Ahmadinejad and the radicalisation of the regime. Such a securitization of the issue naturally called for the implementation of a 'coercive diplomacy' towards Iran, which consists of backing "one's demand on an adversary with a threat of punishment for non-compliance that he will consider credible and potent enough to persuade him to comply with the demand"⁵⁴ based on EU sanctions.

On the other hand, Turkey has developed a narrative towards Iran closer to the third discourse, emphasizing Iran's rights whereby contributing to 'de-securitize' the issue. Contrary to the EU, the Turkish discourse is more sensitive towards the self-perception of Iran and its role in regional and world affairs. By openly promoting the idea that the best way to deal with Iran is to work on the basis of normalized relations with key actors of the international community, Turkey shows understanding for the tensions which characterize Iranian foreign policy. Iran has developed a sense of importance towards other Islamic nations derived from 'it's perceived world-historical revolution' which however collides with a strong feeling of insecurity, strategic loneliness and the aspiration for more which stems from its distinctive non-Arab identity and its tumultuous relations with the West.⁵⁵ More importantly, the difference between the EU's and Turkey's discourse demonstrates a different perception of the Iranian regime as such.

⁵³ Ruth Hanau Santini, op.cit., pp. 467-489.

⁵⁴ Alexander George, *Forceful persuasion: coercive diplomacy as an alternative to war*, Washington, DC: Institute of Peace, 1997, p. 4, quoted in Ruth Hanau Santini, op. cit. p. 470.

⁵⁵ Fahri, F. and Lotfian, S.. "Iran's Post-Revolution Foreign Policy Puzzle", in *Worldviews of Aspiring powers*, H.R. Nau and D.M. Ollapally (eds), Oxford, Oxford University Press, 2012, p. 120.

The failure of the 2010 Tehran declaration is a clear evidence of the impossibility to bridge the two discourses and approaches. Another important difference between the European and the Turkish approach relates to the time frame. While the sanctions are designed to produce effects in the short term (the red lines of Israel regarding the time left before Iran is able to produce nuclear weapons being an important source of pressure), an approach based on negotiations and mutual understanding follows objectives which are further away. This difference in terms of timing is of great importance if one considers that Iran has over the last decade been able to develop its nuclear programme to the extent that even a Israeli military strike would not be able to completely annihilate Iran's nuclear potential.⁵⁶

3.2 A critical view on the sanctions: clear impact but questionable success

The Western sanctioning approach clearly dominates the relations between Iran and the international community. This seems problematic however as there are today strong arguments showing that if this approach has not failed, it is far from having succeeded. Measuring the success of the sanctioning policy by comparing the sanctions' results with their main aims displayed above points to important questions.

The various rounds of sanctions adopted since 2010 have undoubtedly had an impact on Iran. The most visible one is on the Iranian economy and the Iranian leadership has now acknowledged that international measures are not "worthless scraps of paper"⁵⁷ but rather painful measures that effectively crippled key sectors of the economy with important spill-over effects and social consequences. Iran's oil and gas sectors have been hit in priority. As a consequence, investment have been delayed (albeit possessing the second largest gas reserves in the world, Iran ranks 25 as exporter) whereas the oil exports have dropped from 2.5 billion barrels a day in 2011 to less than 1 billion in January 2013.⁵⁸ Following the sanctions on the Central Bank of Iran in December 2011, the value of the Rial started to fall whereas other economic indicators reached their worst levels in 2012: GDP declined by 8%,

⁵⁶ Paul Rogers, "Iran: The Significance of Fordo", Oxford Research Group, *Monthly Global Security Briefing*, September 2012.

⁵⁷ Ahmadinejad about the UN sanctions in 2010. See International Crisis Group, "Spider Web: The Making and Unmaking of Iran Sanctions", *Middle East Report N°138*, 25 February 2013, p. 30.

⁵⁸ International Crisis Group, op. cit. pp.22-23.

unemployment rose to 20%.⁵⁹ Rising inflation force Ahmadinejad to adopt a reform plan in December 2010 whereby cutting down state subsidies which in turn negatively impacted the poorest categories of the people. One of the most detrimental consequences of the sanctions relates to the healthcare system. The weakness of the Rial made imported medicine and material more expensive thus disrupting the whole system, although medicine, food and humanitarian aid are exempted from the sanctions.⁶⁰ Other unintended consequences are the strengthening of the black market into a mafia-like system which will remain when the sanctions are lifted or the impossibility for student to finish their students because of banking restrictions.⁶¹

Regarding the nuclear programme, the impact of the sanctions is much more debatable. The sharpening sanctions have not been correlated by a reduction of enrichment-related activities. To the contrary and despite the ban on trade of key industrial material, since 2006, progress have been observed in many areas: the Fordow plan is operational, Iran enriches uranium at 20% and the Bushehr reactor was completed in 2011.⁶² Overall, the IAEA inspections in Iran show that the sanctions have not affected the trajectory of the nuclear programme.⁶³

In other words, there is no evidence that the sanction's primary aim to change Iran's nuclear calculus has been fulfilled. While the economy is hardly affected by the sanctions, there are signs that Iran has turned towards an 'economy of resistance' whereby the "efforts have focussed far more on adjusting its economy to the reality of sanctions than on seeking their removal".⁶⁴ Iran still enjoys a positive balance of trade (due to high oil prices) but faces a deficit in its balance of capital account.⁶⁵ The reduction of budget resources as a consequence of decreased oil exports (which still generates 75% of Iran's hard currency revenues) has been partially compensated by the introduction of a VAT.⁶⁶ In order to make basic goods such as food and medicine available, the government has introduced a differentiated exchange rate between the Rial and the dollar, making less important goods

⁵⁹ Bijan Khajehpour et al, op. cit. pp. 20-21.

⁶⁰ International Crisis Group, op. cit. p. 34.

⁶¹ Ibid.

⁶² Ibid. p. 20.

⁶³ Bijan Khajehpour et al., op. cit. p. 30.

⁶⁴ International Crisis Group, op. cit. p. 26.

⁶⁵ Bijan Khajehpour et al., op. cit. p. 22

⁶⁶ Ibid.

such as luxury cars relatively more expensive as they are bought using dollars exchanged at the market rate whereas strategic goods are bought using dollars using an official fixed and 'cheap' exchange rate.⁶⁷ Barter for oil transactions have been increased, notably with China.⁶⁸

The expected outcome of the sanctions consisting in turning the business community against the regime seems not to have been successful either. Evidence show that rather than pushing for a change in the nuclear and foreign policies, the Iranian business community has worked to secure its interests by asking for specific concessions such as delays in implementing the subsidy reform or guarantees to use preferable currency exchange rates.⁶⁹ Contrary to what Western intelligence sources have put forward, the pain inflicted to Iran's private sector has not led business leaders to ask for a change in the nuclear strategy, probably because they do not have the necessary political influence to do so.⁷⁰ More generally, it seems that the sanctions have more united than divided the Iranian elite and thus have rather strengthened than weakened the regime.⁷¹

This consolidation of the regime takes also the form of the strengthening in the Iranian society of the classical narrative of resistance to the West. By implementing this hurting sanctioning policy, the international community and particularly the West is actually proving that the official discourse against Western powers trying to keep Iran underdeveloped and dependent is true. This classical narrative is strengthened because the sanctions are now openly acknowledged, thus turning Iran into a power resisting unjust Western policies and dominant interests. While it is very difficult to assess the degree of adhesion of the population to this discourse, it seems that an increasing part of the population is blaming the US rather than the Iranian government for the pain suffered.⁷²

The relevant question is therefore whether there will be a breaking point. Should the sanctions stay in place or be strengthened, will they be able to meet their main objectives, namely to change the Iranian leadership's nuclear calculus? Given the current trend and the

⁶⁷ "Iran introduces tiered exchange rates for imports", *Reuters*, 21 July 2012, accessed 15 April 2013. <http://www.reuters.com/article/2012/07/21/us-iran-currency-imports-idUSBRE86K08J20120721>

⁶⁸ International Crisis Group, op. cit. p. 27 footnote 160.

⁶⁹ Bijan Khajehpour et al., op. cit. p. 19

⁷⁰ Ibid. pp. 18-19.

⁷¹ Ibid. p. 18.

⁷² Ibid. p. 16.

evidence gathered in recent in-depth qualitative analysis exposed above, such an assumption remains a hypothesis.

3.3 Role and perceptions of the EU in the current context

The fact that Brazil and Turkey were unable to convince the US to adhere to their initiative has brought new light on the EU's role as the chair of the P5+1 group negotiating with Iran. The handling of the Iranian nuclear programme by Ashton and the EEAS is considered one a main success of EU foreign policy, despite the lack of concrete results of the successive rounds of negotiations, the last being held at Almaty on 5 and 6 April 2013.⁷³ On the one hand, the EU has been able to keep some unity within the P5+1 which was not self-evident given the reluctance towards sanctions showed by Russia and China. While China opposes too heavy sanctions because it relies on Iranian oil imports, Russia rather opposes them because of the potentially destabilizing effect they can have for the region, not least given its interests in Syria.⁷⁴ On the other hand, Ashton and her team have worked in close contact with other emerging powers such as India, Brazil and Turkey. These countries have been regularly briefed and informed about the EU's intentions and been included as much as possible in its initiatives.⁷⁵

From an Iranian perspective however, the perception of the EU has obviously suffered due to the sanction policy. Whereas the EU used to be perceived rather favourably by the Iranian public opinion and some part of the political elite (notably the liberal reformists),⁷⁶ the policy developed over the last three years has changed the EU's image. The fact that the EU leads the diplomatic track does not give it a particularly good image. From a position close to a mediator in the early 2000's, the EU has become a negotiator with a clear agenda. However, the negotiation priorities defined by the EU as chair of the E3+3 remain so far

⁷³ Justyna Pawlak and Yeganeh Torbati, "Powers and Iran fail to end nuclear deadlock in Almaty", *Reuters online*, 6 April 2013, accessed 23 April 2013.

⁷⁴ Eskandar Sadeghi-Boroujerdi, "Sanctioning Iran: Implications and Consequences", *Oxford Research Group*, October 2012, p. 5.

⁷⁵ Interviews with Turkish and Brazilian diplomats, Permanent delegation and Mission to the EU, Brussels, 19 April 2013.

⁷⁶ Ruth Hanau Santini, Raffaele Mauriello and Lorenzo Trombetta, "Taking the lead, EU mediation role assessed by Iran and Lebanon", in Sonia Lucarelli and Lorenzo Fioramonti (eds.), *External Perceptions of the EU as a Global Actor*, Abingdon, Routledge, 2010, p. 53. [pp.52-69].

away from those of the Iranians that continuing to negotiate in the current format (short meetings held when the parties agree to do so) seems doomed to fail.⁷⁷ What is needed in the absence of trust and confidence between the main stakeholders is a mediator accepted by both sides. Turkey and Brazil have shown their readiness to take up this role and their contribution could help to create an alternative narrative to the sanctions.

Conclusion

Iran's revolutionary history⁷⁸ shows that power has always produced resistance to it. Iran has now developed a resistance economy, using various tools to circumvent at best the sanctions. It has also involved other states. For example Pakistan and Iran have agreed to launch the construction of a gas pipeline which is vital for Iran to work around the sanctions.⁷⁹ Consequently, the logic of sanctions should be extended to ensure that the loopholes of the system are fixed. This is not an easy task as emerging powers around the world don't share the ideological justification and normative arguments put forward by the West against Iran. The logic of the sanctions also leads to a reading of international relations through Manichean lenses: "Countries like Turkey and Pakistan need to decide whether they stand with the United States and Europe against Iran's pursuit of nuclear weapons or whether they want to subsidize Iran's illicit activities."⁸⁰ Such a view is however contrary to the type of international relations that emerging powers such as Brazil or Turkey are working to develop.

This paper has shown that currently, emerging powers don't have the leverage to decisively influence Western powers' policy choices towards Iran. However, although they don't call

⁷⁷ Rouzbeh Parsi, "Stereomorphonic: Iran and the West", *EUISS Analysis*, June 2012.

⁷⁸ Iran's revolutionary history encompasses events that go beyond the 1979 Islamic revolution: the 1908 Constitutional revolution, Mossadegh's resistance to Western interests in Iran and the various forms of internal resistance, first against the Shah but then also against the Islamic regime. See Arshin Adib-Moghaddam, "What is radicalism? Power and resistance in Iran" in George Joffré (Ed), *Islamist Radicalisation in Europe and the EU*, Taurus, 2013.

⁷⁹ Simon Tisdall, "Iranian-Pakistan gas link has gains in pipeline for Zardari and Ahmadinejad", *The Guardian*, 28 March 2013, accessed 17 April 2013. <http://www.guardian.co.uk/world/2013/mar/28/iran-pakistan-gas-pipeline-zardari-ahmadinejad>

⁸⁰ "Bill would close Iranian sanctions loophole", *News and Sentinel.com*, 23 March 2013, accessed 17 April 2013. <http://www.newsandsentinel.com/page/content.detail/id/572205/Bill-would-close-Iranian-sanctions-loophole.html?nav=5061>

the shots on the issue, the questionable outcome that the sanctions have yielded so far and their limits which appear with increasing clarity shows that the views put forward by Turkey and Brazil may well be the right ones to work towards a solution in the long term.