

Mideast Freedom Forum Berlin
Policy Paper

Policy Measures for a Sustainable Approach Toward the Islamic Republic of Iran

1. Immediate Measures for the Consistent Implementation of the EU's Designation of the Islamic Revolutionary Guard Corps (IRGC) as a Terrorist Organization

The EU's designation of the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organization on January 29, 2026, marks a significant tightening of the EU sanctions regime and opens up new avenues for effectively combating the terrorist threat posed by the IRGC. To fully exploit the new legal and operational opportunities, the German government must implement the following package of measures:

► **Protection against direct threats from the IRGC and counterintelligence**

Significant expansion of protective and preventive measures for individuals, groups, and organizations threatened by the regime in Germany, particularly for Iranian exiles, Jewish individuals, and (pro-)Israeli individuals and institutions. In addition, expansion of measures for (digital) counterintelligence.

► **Investigation of the Embassy and Diplomatic Consequences**

Comprehensive review of the Embassy of the Islamic Republic for ties to the Revolutionary Guards. If necessary, declare affected individuals persona non grata.

► **Review and Termination of Existing University Collaborations**

Comprehensive review of existing cooperation agreements between German and Iranian universities regarding possible ties between Iranian actors and the IRGC, particularly in fields related to nuclear technology and in connection with the export of Islamist ideology or recruitment and espionage activities.

► **Financial Sanctions and Asset Freezes**

Comprehensive freezing of all identifiable assets of the IRGC and associated individuals and entities.

► **Strict Sanctions Against Iranian Banks in Germany**

Systematic review and appropriate sanctions against Iranian banks based in Germany and all transactions processed through them.

► **Strict sanctions against Iranian companies in Germany**

Systematic review of Iranian companies based in Germany and all transactions conducted through them with regard to organizational or business ties to the IRGC.

► **Prohibition and Prosecution of IRGC-Affiliated Organizations**

National bans on activities and associations for all structures, organizations, and associations affiliated with and/or controlled by the IRGC, accompanied by authorization for criminal prosecution and its consistent enforcement.

► **Dismantling of support networks**

Consistent criminal prosecution of networks affiliated with the IRGC to prevent any form of material or non-material support (funding, propaganda, logistics).

► **Enforcement of immigration-related consequences**

Imposition of entry bans, review of existing residence permits, and, where appropriate, deportation of individuals affiliated with the IRGC.

► **Institutionalizing interagency coordination**

Establishment of an interagency working group on the threat posed by the IRGC within the National Security Council, with a mandate for intelligence fusion, operational planning, and regular situation reports to the federal government.

2. Further Necessary Measures for a Sustainable Policy Toward the Islamic Republic of Iran

A policy that takes seriously the threat posed by the Islamic Republic of Iran and its role as a central factor in transregional political destabilization and global insecurity must not be limited to the measures against the IRGC and its influence already outlined in Section 1. In the past, the German side greatly underestimated the threat and, as a result, acted too hesitantly. As a result, German policy has contributed to the regional and global spread of Tehran's destabilizing influence. Normal relations with the Islamic Republic are not possible, either regionally or internationally. The unprecedented **massacres** of tens of thousands of its own citizens by the regime's

henchmen in early January 2026 must have been the final warning that business as usual is no longer an option.

A **fundamental reorientation** is therefore necessary as part of a sustainable policy of risk mitigation. This must also take into account the regime's **redemptive anti-Semitic, anti-Western ideology**. An **appropriate approach** to the Islamic Republic requires, above all, a **confident stance toward the regime** in the form of a **clear foreign, security, and human rights policy**:

A sovereign stance toward the regime

- ▶ **Immediate expulsion of the Iranian ambassador from Germany and recall of the German ambassador from Tehran.** This would redraw the lines with Tehran and send an unmistakable signal that there is no willingness to maintain normal diplomatic relations with the regime. Furthermore, it would send an important signal to the opposition in Iran, which is fighting for its political freedom.
- ▶ **Initiate political dialogue with democratic, secular Iranian opposition figures and human rights organizations.** Germany must clearly demonstrate that it does not support the terrorist regime of the Islamic Republic of Iran, but rather the people of Iran.

Clear Foreign and Security Policy

- ▶ **Taking into account the regime's redemptive anti-Semitic, anti-Western ideology in all foreign policy decisions.** The regime pursues the delusional mission of destroying Israel as its national objective, thereby plunging the entire Middle East into war and devastation. The ultimate goal is an Islamist world empire. Its own population is murdered or oppressed if it stands in the way. If the ideological, irrational nature of the regime is ignored, countermeasures will remain piecemeal. **As the last few decades have shown, diplomatic compromises will not deter it from this mission.**
- ▶ **Political isolation of the regime at all levels.** The German government has already stated on multiple occasions that the regime is on its last legs. This clear assessment must be followed by action.
- ▶ **Prepare for and work toward further sanctions at the EU level against additional regime officials.** Should complicated coordination processes slow down necessary sanctions, Germany should take the lead with sanctions at the national level.
- ▶ **A reduction of trade relations to a humanitarian minimum.** In particular, the sensitive areas of **dual-use goods** and **all financial flows** must be strictly controlled.
- ▶ **Development of a sustainable strategy for foreign and security policy action against the proxy network in the Middle East.** The Islamic Republic's network is a central factor in the

political instability of the entire region. Acting on Tehran's behalf, this "Axis of Resistance" terrorizes hundreds of thousands of people, significantly disrupts international shipping in the Red Sea, and wages war against Israel.

- ▶ **Sustained action against the ongoing, illegal systems for circumventing sanctions.** International sanctions regimes are systematically circumvented through a complex network of shadow fleets and covert trade routes. This concerns, on the one hand, the trade in Iranian oil and irregular financial flows, and, on the other hand, the flow of proliferation-related goods and the illegal arms trade. In particular, more pressure must be exerted on Turkey, China, Russia, Qatar, and the UAE.

A Clear Human Rights Policy

- ▶ **Advocacy for the immediate and unconditional release of all political prisoners** and for the **immediate release of all unlawfully detained foreign nationals**, as well as the **abolition of the death penalty**.
- ▶ **Simplification of the humanitarian admission process and adaptation of the admission criteria for Iranian opposition members to the current emergency situation.** In particular, political persecution based on gender, sexual orientation and identity, ethnicity, and conversion to another religion must be clearly recognized as grounds for asylum. The potential entry of regime members must be controlled.
- ▶ **Call on the federal states to impose a moratorium on deportations to Iran.** Exception: regime officials, IRGC members, and their supporters.
- ▶ **Suspension of in-person appointments for Iranian nationals at the Iranian Embassy** for the purpose of renewing Iranian identity documents, due to the risk of repression against those attending. Emergency travel documents should be issued to affected foreign nationals.
- ▶ **Ensure that crimes committed in Iran are documented.** After the regime's fall, Germany must assist in the international prosecution of the perpetrators.

3. Long-Term Implications for German Domestic and Security Policy

Beyond these packages of measures, appropriate consequences must be drawn from the years-long delay in the EU's process of designating terrorist groups. Security must not be allowed to fail due to bureaucratic inertia. In order to be able to respond quickly and in a legally sound manner to threats in the event of an emergency in the future, the creation of new legislation must be considered. Particularly in light of current geopolitical developments (e.g., Russia) that extend far beyond the case of the Islamic Republic of Iran, the **creation of a national instrument**

for designating and criminalizing terrorist and state-sponsored terrorist organizations is urgently needed.

Currently, eight countries—the United States, Canada, Israel, Saudi Arabia, Bahrain, Paraguay, Ecuador, and Australia—have completely banned the IRGC at the national level, while Argentina has banned the Al-Quds Brigades as a terrorist organization. **The case of Australia is particularly relevant for the creation of a mechanism to ban comparable organizations under German law.** There, until the **amendment of criminal law through the Criminal Code Amendment (State Sponsors of Terrorism) Act 2025**, the options for banning state-sponsored terrorist actors were limited, similar to those in Germany.

IRGC Bans in Various Countries

State	Subject	Type of Ban	Date
United States	IRGC	Designation as a <i>Foreign Terrorist Organization</i> by the U.S. Department of State	April 15, 2019
Canada	IRGC	In both cases, designated as a terrorist organization by the Canadian government under the applicable <i>Criminal Code</i>	December 17, 2012 (Al-Quds Brigades) June 19, 2024 (IRGC as a whole)
Israel	IRGC	Designated as a terrorist organization under applicable counterterrorism laws	December 2, 2012 (Al-Quds Brigades) March 28, 2024 IRGC (entire organization)
Saudi Arabia	IRGC	Designated as a terrorist organization under applicable counterterrorism laws	October 23, 2018
Bahrain	IRGC	Designated as a terrorist organization under applicable counterterrorism laws	October 23, 2018
Paraguay	IRGC	Designated as a terrorist organization by executive decree based on applicable anti-terrorism laws	April 25, 2025
Ecuador	IRGC	Designated as a terrorist organization by executive decree based on applicable anti-terrorism laws	September 16, 2025
Australia	IRGC	Amendment to criminal law through the Criminal Code Amendment (State Sponsors of Terrorism) Act 2025	November 27, 2025
Argentina	Al-Quds Brigades	Designated as a terrorist organization by executive decree based on applicable anti-terrorism laws	January 17, 2026
Ukraine	IRGC	Designated as a terrorist organization under applicable counterterrorism laws	January 30, 2026