



Implementation Day Report

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The International Atomic Energy Agency's (IAEA) [report](#) on Iran's compliance with a range of commitments under the JCPOA is essentially an item-by-item checklist. As such, it provides few details about the steps Iran took to comply with the many JCPOA requirements. Several questions remain unanswered. But the checklist shows that the extensive limitations on Iran's nuclear program are now in place.

Two footnotes contain interesting information. One states that no enrichment in the Natanz Fuel Enrichment Plant (FEP) was occurring on January 16. Hopefully, this halt to enrichment continues as it is the most straightforward way to maintain a cap of 300 kilograms of less than 3.67 percent low enriched uranium (LEU) hexafluoride, as required under the JCPOA. The other footnote states that all near 20 percent LEU plates and fuel assemblies for the Tehran Research Reactor (TRR) were irradiated on January 16. This appears to suggest that no unirradiated near 20 percent LEU remains in Iran. If true, this would be better than expected and in line with ISIS's own original recommendations. Whether or not any 20 percent LEU remains in Iran requires confirmation. No near 20 percent LEU in unirradiated oxide form (such as mixtures with aluminum or in plates) or in non-oxide forms present in Iran would be preferred.

The report makes clear that the IAEA has not determined the number of centrifuges Iran has made. Iran merely had to state the number of rotor tubes and bellows it now has and allow the inspectors to count and number them. The IAEA did not determine, or have the means to determine, if Iran provided a complete declaration of all the rotors and bellows it possesses. How this issue of completeness will be addressed remains unclear.

Another issue concerns breakout. In a [previous report](#) assessing breakout timelines under the JCPOA, we showed that breakout timelines range between 7 and 13 months, where the lower bound results from Iran re-installing its IR-2m centrifuges currently being stored in the FEP. We have not factored in any undeclared IR-2m centrifuges or fresh near 20 percent LEU. Nothing in the IAEA report changes our 7-13 month assessment. As such, statements that breakout timelines exceed 12 months should be challenged, in particular to answer the question of why Iran would not reinstall IR-2m centrifuges.

We will continue to seek answers to key questions and assess the implementation of the JCPOA

in the coming days and weeks.

As a final note, Iran has made it clear that it has no intention of complying with missile and arms restrictions in new United Nations Security Council resolution 2231 or national restrictions of supplier countries. It has recently violated UN missile restrictions and will likely abuse the JCPOA's Procurement Channel to seek missile-related dual-use goods, a likelihood increased by the difficulties so far encountered in standing up an effective channel. It is imperative that the U.S. government and its allies impose missile-related sanctions on Iranian and other entities as soon as possible in order to show that the United States will strictly enforce the UNSC resolution and JCPOA.