

CIRCULAR REF: 2015/019

**CIRCULATED TO ALL MEMBERS, BROKERS AND DIRECTORS
ATTENTION INSURANCE DEPT**

**15 JULY 2015
MJS/PO**

SANCTIONS - IRAN - JOINT COMPREHENSIVE PLAN OF ACTION, VIENNA, 14 JULY 2015

The diplomatic agreement of 14 July 2015 between the E3/EU+3 and the Islamic Republic of Iran opens the way for the restoration of trade activates with Iran by lifting the trade, energy, insurance and banking embargoes that have been incrementally imposed by the European Union and U.S. since 2009.

Full details of the way in which implementation of the agreement will be managed in the EU and U.S. is yet to emerge and is unlikely to do so in the immediate future, but it is clearly intended that all UN Security Council sanctions as well as multilateral and national sanctions related to Iran's nuclear programme will be lifted, subject to the terms of the Joint Comprehensive Plan of Action (JCPOA).

At this early stage in the process it is difficult for the Club to anticipate the timescale by which the current legislation in the EU and U.S. will be repealed or rolled back. It is, however, clear that the prohibition on the provision of insurance or reinsurance to Iran or the Government of Iran, an Iranian legal person, entity or body, or a natural person or a legal person, entity or body acting on their behalf or at their direction will be lifted, and the current prohibition in respect of the transport of oil, petrochemical and gas products will also be lifted.

The JCPOA provides that adoption will occur 90 days after the endorsement of the JCPOA by the UN Security Council or at an earlier date by mutual consent of all JCPOA participants, at which point the JCPOA comes into effect. The EU and its Member States will adopt an EU Regulation, taking effect on the date of implementation, terminating all provisions of the EU Regulation implementing all nuclear-related economic and financial EU sanctions.

In the meantime the Club advises Members with an interest in trading to Iran to proceed with extreme caution and continue to seek independent advice before committing to trade contracts.

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THE NORTH OF ENGLAND P&I ASSOCIATION LIMITED 100 The Quayside, Newcastle upon Tyne, UK, NE1 3DU
Telephone: +44 (0) 191 2325221 Fax: +44 (0) 191 2610540 www.nepia.com

The North of England Protecting and Indemnity Association Limited. Registered in England No. 505456. Registered Office above
Hong Kong: Room 3007-08 COSCO Tower, 183 Queen's Road, Central, Hong Kong Telephone: +852 25446813 Fax: +852 25424424.
Greece: 5-7 Aghiou Nikolaou, GR 185 37 Piraeus, Greece Telephone: +30 210 4283038 Fax: +30 210 4280920.
Singapore: 80 Anson Road, #26-04 Fuji Xerox Towers, Singapore 079907 Telephone: +65 64110160 Fax: +65 62240160.
Tokyo: Shinkyobashi Building, 6th Floor, 2-8-8 Kyobashi, Chuo-ku, Tokyo, Japan, 104 – 0031 Telephone: +81 (3) 5159 5373 Fax: +81 (3) 5250 0003.
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Attachments:

EU Council Decision (CFSP) 2015/1148 of 14 July 2015
Joint Comprehensive Plan of Action 14 July 2015 and
Annex II, sanctions-related commitments, thereof.

MIKE SALTHOUSE
DEPUTY GLOBAL DIRECTOR (CLAIMS)
The North of England P&I Association Limited