



March 28, 2025

## Iran's Petroleum Exports to China and U.S. Sanctions

Some Members of Congress *remain* concerned with the ability of longtime U.S. *adversary* Iran to raise revenue by selling petroleum. The United States has sought to reduce other countries' imports of Iranian petroleum via sanctions, including some *new sanctions authorities* enacted in the 118<sup>th</sup> Congress. Since 2021, nearly all Iranian petroleum exports reportedly have gone to the People's Republic of China (PRC, or China), with traders using a range of evasive techniques. Citing the threat of Iran's nuclear and ballistic missile programs and its support for terrorist groups, President Trump in February 2025 directed the imposition of "*maximum pressure*" on Iran, including a campaign to drive Iran's oil exports to "zero."

### Background: U.S. Sanctions

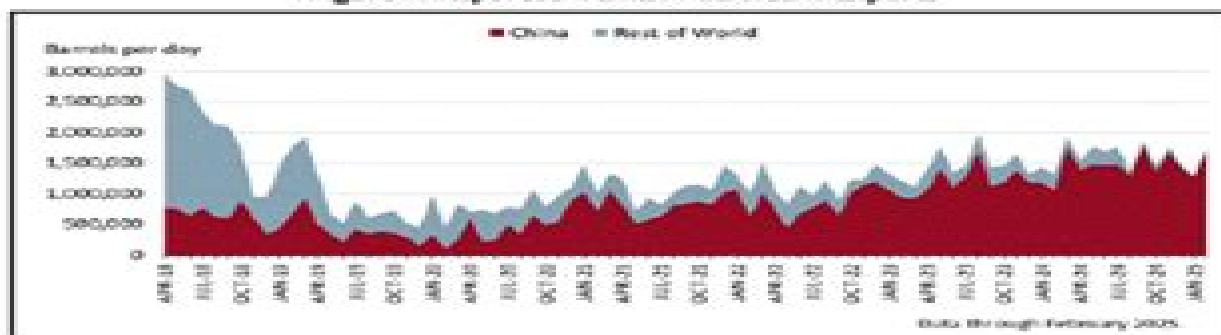
U.S. efforts to limit Iranian income from crude oil, petroleum products, and petrochemical products (petroleum) via *sanctions* go *back decades*. Section 1245(d) of the FY 2012 National Defense Authorization Act (NDAA, P.L. 112-81; 22 U.S.C. §8513a(d)) directs the President to block from the U.S. financial system foreign financial institutions that knowingly conduct "any significant financial transaction" with sanctioned Iranian banks, including Iran's Central Bank, excluding foreign central banks that do not engage in transactions related to Iranian petroleum. The statute also authorizes the President to except from *secondary sanctions* foreign financial institutions in countries determined to be significantly reducing their purchases of Iranian crude oil (President Trump approved the last such exception in 2018).

In 2018, President Trump ceased U.S. participation in the Joint Comprehensive Plan of Action (JCPOA) and issued Executive Order (E.O.) 13846, which reinstated sanctions that had been terminated pursuant to the JCPOA, including on the "purchase, acquisition, sale, transport, or marketing" of Iranian petroleum. In January 2020, President Trump issued E.O. 13902, authorizing the imposition of sanctions on those operating in or engaged in the "sale, supply, or transfer to or from Iran" of goods or services related to specified sectors of the Iranian economy; in October 2024, then-Treasury Secretary Janet Yellen issued a *determination*, authorizing those sanctions under E.O. 13902 to apply to Iran's petroleum sector. Under these executive orders, the United States has sanctioned *dozens* of *entities* for *their role* in the shipment of Iranian petroleum to Asia.

### Iran's Petroleum Exports to the PRC

U.S. secondary sanctions aim to deny revenue to the primary target by imposing costs to dissuade foreign persons from participating in activities that are illegal for U.S. persons. Iranian petroleum exports *reportedly hit a record* in the first quarter of 2024, with "almost all" going to China, and remain high as of early 2025 despite some reported *disruptions*. The U.S. Energy Information Administration (EIA) estimated in an October 2024 *congressionally mandated report* that Iranian petroleum sales generated revenues of \$53 billion in 2023 and \$54 billion in 2022. China's continuing imports of Iranian petroleum may demonstrate that PRC-based buyers believe that the economic benefits of buying Iranian petroleum exceed the risks of U.S. sanctions.

Figure 1. Reported Iranian Petroleum Exports



Source: United Against Nuclear Iran, data available [here](#).

Notes: "Rest of World" includes some exports to unknown destinations, which may eventually reach China.

# Iran Sanctions Crs Reports

**Tim S. Macleod**



## **Iran Sanctions Crs Reports:**

**Middle East: Selected Key Issues and Options for the 112th Congress , Iran Business Law Handbook Volume 1 Strategic Information and Basic Laws** IBP, Inc., 2016-02-12 Iran Business Law Handbook Strategic Information and Basic Laws **Global Stability and U.S. National Security** Kristen Boon, Aziz Z. Huq, 2012 Terrorism Commentary on Security Documents is a series that provides primary source documents and expert commentary on the worldwide counter terrorism effort Among the documents collected are transcripts of Congressional testimony reports by such federal government bodies as the Congressional Research Service CRS and the Government Accountability Office GAO and case law covering issues related to terrorism Most volumes carry a single theme and inside each volume the documents appear within topic based categories The series also includes a subject index and other indices that guide the user through this complex area of the law Volume 123 Global Stability and U S National Security includes documents that illuminate instability concerns in key regions of the world and offer insights into how the lack of stability negatively affects U S interests as well as the interests of other nations The documents selected by Douglas Lovelace include primarily studies of instability concerns in the Middle East and North Africa as well as a document providing a general assessment of global stability and reports on Southeast and Central Asia and Latin America **Foreign Policy in Iran and Saudi Arabia** Robert Mason, 2014-12-22 Saudi Arabia with its US alliance and abundance of oil dollars has a very different economic story to that of Iran which despite enormous natural gas reserves has been hit hard by economic trade scientific and military sanctions since its 1979 revolution Robert Mason looks at the effect that economic considerations such as oil gas sanctions trade and investment have on foreign policy decision making processes and diplomatic activities By examining the foreign policies of Saudi Arabia and Iran towards each other and towards the wider Middle East and beyond Mason seeks to highlight how oil policy including oil production pricing and security of supply and demand is the paramount economic factor which drives the diplomacy and rivalry of these two pivotal regional powers By comparing the foreign policy of Saudi Arabia and Iran towards the international community and the US in particular Mason presents the very different economic and political trajectories of these two countries In the case of Saudi Arabia it has long been oil which has given the country importance both within the region and on an international scale This has made it a vital ally for the West which culminated in the stationing of US troops on Saudi soil in the run up to the Gulf War of 1991 In contrast Iran s resistance strategy has rather than concentrating on relationships with the West instead looked to a number of other players such as those in Central Asia and Latin America Mason uses the Saudi and Iranian cases to illustrate the combination of ideological geo strategy and economic resources that have insulated these two regimes against internal and external pressures and resulted in their dominance in the regional system By concentrating on the economic factors in alliance building and alliance deconstruction Mason offers vital analysis for researchers of international relations in the Middle East and the processes involved in the formation of foreign policy

*International Trade and Finance* Raymond J. Ahearn, 2011-04 Contents 1 Introduction 2 The Role of Congress in International Trade and Finance 3 Policy Issues for Congress Trade Agreements and Negotiations U S South Korea Free Trade Agreement U S Colombia Free Trade Agreement U S Panama Free Trade Agreement The WTO and WTO Doha Round Trans Pacific Partnership China Export Promotion and Financing Export Controls and Sanctions Import Policies Trade Remedies Trade Preferences Border Security and Trade Facilitation Buy American Miscellaneous Tariff Bill NAFTA Trucking Trade Adjustment Assistance International Financial Institutions 4 Outlook This is a print on demand edition of an important hard to find publication

**Terrorism: Commentary on Security Documents Index IV** Kristen Boon, Aziz Z. Huq, Douglas Lovelace, 2012 With the publication of *Terrorism Commentary on Security Documents Index IV* Oxford University Press continues to provide periodic stand alone volumes containing cumulative indexes for the individual volumes in the series *Index IV* covering *Terrorism Vols 101-120* adds to the previous index volumes in order to ensure comprehensive searchability within the series The availability of the cumulative index as well as the volume specific indexes makes the series more convenient for the reader and provides the researcher with multiple ways to search for information *Index IV* also features improved double columned index formatting for ease of use in a more compact volume Although each volume in *Terrorism Commentary on Security Documents* contains its own volume specific index this comprehensive index fully indexes the last twenty volumes in the *Terrorism* series Only subject indexes are included in the individual volumes whereas this comprehensive index includes five different types of indexes including a subject index an index organized according to the title of the document an index based on the name of the document's author an index correlated to the year of the document and a subject by year index This cumulative index volume therefore provides readers with multiple ways to conduct research within *Volumes 101-120* of *Terrorism Commentary on Security Documents*

**Iran** Congressional Research Congressional Research Service, 2014-12-30 The United States has led the international community in imposing economic sanctions on Iran in an effort to change the government of that country's support of acts of international terrorism poor human rights record weapons and missile development and acquisition role in regional instability and development of a nuclear program This report identifies the legislative bases for sanctions imposed on Iran and the nature of the authority to waive or lift those restrictions It comprises two tables that present legislation and executive orders that are specific to Iran and its objectionable activities in the areas of terrorism human rights and weapons proliferation It will be updated if and when new legislation is enacted or in the case of executive orders if and when the President takes additional steps to change U S policy toward Iran Other CRS reports address the U S Iran relationship including a comprehensive discussion of the practical application of economic sanctions CRS Report RS20871 *Iran Sanctions* by Kenneth Katzman See also CRS Report R43333 *Iran Interim Nuclear Agreement and Talks on a Comprehensive Accord* by Kenneth Katzman Paul K Kerr and Mary Beth D Nikitin CRS Report R43492 *Achievements of and Outlook for Sanctions on Iran* by Kenneth Katzman CRS Report RL32048

Iran U S Concerns and Policy Responses by Kenneth Katzman and CRS Report R40094 Iran's Nuclear Program Tehran's Compliance with International Obligations by Paul K Kerr      **Terrorism** ,1979      **CrS Report for Congress** Congressional Research Service: The Libr,Kenneth Katzman,2013-11 Iran is subject to a wide range of U S sanctions restricting trade with investment and U S foreign aid to Iran and requiring the United States to vote against international lending to Iran Several laws and Executive Orders authorize sanctions against foreign companies that do business with Iran as part of an effort to persuade foreign firms to choose between the Iranian market and the much larger U S market A formal U S effort to curb international energy investment in Iran began in 1996 with the Iran Sanctions Act ISA No firms have been sanctioned under it and the precise effects of that law on energy investment in Iran as separate from other factors affecting international firms decisions on whether to invest in Iran has been unclear While international pressure on Iran to curb its nuclear program has increased the hesitation of many major foreign firms to invest in Iran's energy sector hindering Iran's efforts to expand oil production beyond 4 1 million barrels per day some firms continue to see opportunity in Iran This particularly appears to be the case for companies in Asia that appear eager to fill the void left by major European and American firms and to line up steady supplies      **United States and the Iranian Nuclear Programme** Steven Hurst,2018-08-01 Steven Hurst traces the development of the Iranian nuclear weapon crisis across its historical context from the conception of Iran's nuclear programme under the Shah in 1957 to the signing of the Joint Comprehensive Plan of Action in 2015 Emphasising the centrality of domestic politics in decision making on both sides Hurst adopts a broader perspective on the Iranian nuclear programme and explains the continued failure of the USA to halt it He reveals how President Obama's alterations to the American strategy accompanied by shifts in Iranian domestic politics finally brought about a resolution      Terrorism Robert A. Friedlander,Howard Sidney Levie,Donald J. Musch,Yonah Alexander,Douglas C. Lovelace (Jr.),2004 An extensive collection of significant documents covering all major and minor issues and events regarding terrorism Government reports executive orders speeches court proceedings and position papers are presented in full text reprint Oceana Website      **Iran Sanctions** Kenneth Katzman,2014-03-18 Strict sanctions on Iran sanctions that primarily target Iran's key energy sector and its access to the international financial system harmed Iran's economy to the point where Iran's leaders on November 24 2013 accepted an interim agreement Joint Plan of Action JPA that halts further expansion of Iran's nuclear program in exchange for temporary and modest sanctions relief The June 14 2013 election of Hassan Rouhani as Iran's president was an indication of the growing public pressure on the regime to achieve an easing of sanctions Oil exports fund nearly half of Iran's government expenditures and by late 2013 sanctions had reduced Iran's oil exports to about 1 million barrels per day far below the 2 5 million barrels per day Iran exported during 2011 The drop was caused by a European Union embargo on purchases of Iranian oil and decisions by other Iranian oil customers to obtain exemptions from U S sanctions by reducing purchases of Iranian oil Twenty countries have such sanctions exemptions During 2012 2013 the loss of revenues from oil

coupled with the cut off of Iran from the international banking system caused a sharp drop in the value of Iran's currency the rial raised inflation to over 50% and reduced Iran's accumulation of and access to reserves of foreign exchange Iran's economy shrank by about 5% in 2013 and many Iranian firms shut down or reduced operations Prior to agreeing to the JPA Iran's main strategy for trying to mitigate the effects of sanctions included creating front companies and using barter trade and informal banking exchange mechanisms Iran also increased non oil exports or exports of hydrocarbon products other than crude oil such as petrochemicals and gas condensates Affluent Iranians have been investing in and driven up prices for real estate and securities listed on the Tehran stock exchange Sanctions also attempted to directly slow Iran's nuclear and missile programs and reduce its military power by hampering its acquisition of foreign technology and weaponry U S assessments indicate mixed success in these efforts although Iran is not believed to be acquiring new advanced conventional weaponry Based largely on its provision of arms to the Assad government in Syria Iran is not complying with U N requirements that it halt weapons shipments Sanctions have not altered Iran's repression of dissent or monitoring of the Internet

**Iran** Kenneth Katzman, 2008 The Bush Administration has pursued several avenues to attempt to contain or end the potential threat posed by Iran at times pursuing limited engagement and at other times leaning toward pursuing efforts to change Iran's regime Some experts believe a potential crisis is looming over Iran's nuclear program because the Bush Administration is sceptical that efforts by several European allies to prevent a nuclear breakout by Iran will succeed although the Administration announced steps in March 2005 to support those talks U S concerns have been heightened by the victory of Mahmoud Ahmadinejad an admitted hardliner in Iran's presidential election on June 24 2005 Some advocate military action against Iran's nuclear infrastructure but others believe that a combination of diplomatic and economic rewards and punishment are the only viable options on the nuclear issue U S sanctions currently in effect ban or strictly limit U S trade aid and investment in Iran and penalise foreign firms that invest in Iran's energy sector but unilateral U S sanctions do not appear to have materially slowed Iran's WMD programs to date Other major U S concerns include Iran's policy in the Near East region particularly Iran's material support to groups that use violence against the U S led Middle East peace process including Hizballah in Lebanon and the Palestinian groups Hamas and Palestinian Islamic Jihad Some senior Al Qaeda activists are in Iran as well although Iran claims they are in custody and will be tried Iran did not obstruct the U S effort to oust Iraq's Saddam Hussein a long time Tehran adversary at least partly in the expectation that pro Iranian Shiite Islamic factions would come to power in Iraq in the aftermath That result occurred as a product of 30 January 2005 elections there Iran is also assisting pro Iranian local leaders in Afghanistan although that support does not appear to be materially hindering the stabilisation and development of Afghanistan Iran's human rights practices and strict limits on democracy have been consistently criticised by official U S and U N reports particularly for Iran's suppression of political dissidents and religious and ethnic minorities New limits on personal freedoms could be imposed by Ahmadinejad who has consistently

advocated a return to many of the original principles of the Islamic revolution as set down by the late Ayatollah Ruhollah Khomeini. However, Iran does hold elections for some positions including that of president, suggesting to some experts that there might be benefits to engaging Iranian officials. According to this view, new sanctions or military action could harden Iran's positions without necessarily easing the potential threat posed by Iran. *Iran* Milton M. Schwartz, 2006. Deals with the political approaches and nuclear capabilities of Iran, an important mid-Eastern country. Israel Confronts Iran P. R. Kumaraswamy, 2012. This study examines Israel's changing perception of Iran and the underlying reasons for the current Israeli tension, anxiety, verbal acrimony, and fears. In deconstructing Israel's fears vis-à-vis Iran, the study looks at Israel's failures to revisit its erstwhile peripheral diplomacy and to make adequate changes. Israel was unable to overcome the nostalgia of the past bonhomie and evolve a cohesive policy on Iran. Moreover, it was afraid of the cost of such a radical shift in its fundamental plank vis-à-vis Iran, the peripheral diplomacy. With the result, Iran soon became a nightmare for Israeli foreign policy and the security establishment. The nuclear controversy is just a recent addition. Given the growing importance of Israel and Iran to India, what are New Delhi's options vis-à-vis the Israel-Iran tensions. Major Studies & Issue Briefs of the Congressional Research Service, Bibliography & Indexes to the ... Supplement, 2005. India and the U.S. Tim S. Macleod, 2010. Long considered a strategic backwater from Washington's perspective, South Asia has emerged in the 21st century as increasingly vital to core U.S. foreign policy interests. India, the region's dominant actor with more than one billion citizens, is often characterised as a nascent major power and natural partner of the United States, one that many analysts view as a potential counterweight to China's growing clout. Washington and New Delhi have been pursuing a strategic partnership since 2004, based on shared values such as democracy, pluralism, and rule of law. This book describes the numerous economic security and global initiatives, including plans for full civilian nuclear energy co-operation which are underway. This book also explores the concerns of Congress with regards to the abuses of human rights, its tensions with Pakistan, and religious freedoms in India. **Iranian Challenges** Katajun Amirpur, 2006. For this Chaillot Paper, a number of respected academics were asked to contribute chapters analysing Iran through the lens of their expertise. The volume covers three main areas: Iran's domestic affairs, Iran and security, and Iran's relations with the West. The authors touch on various topics, including the repercussions of the June 2005 elections and the advent of President Ahmadinejad, the future of the reform movement in Iran, Iranian-American and EU-Iran relations, and inevitably the critical nuclear issue. The nuclear standoff has forced the EU to embrace a unique tool of diplomacy, the E3 EU format, which has given the EU diplomatic and political flexibility and ensured inner European cohesion. **China, Congress and Sanctions** Robert G. Sutter, 1996. Economic Sanctions Reconsidered: Supplemental case histories Gary Clyde Hufbauer, 1990.

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