

October 18, 2015

**FREQUENTLY ASKED QUESTIONS RELATING TO ADOPTION DAY
UNDER THE JOINT COMPREHENSIVE PLAN OF ACTION**

Q: What is Adoption Day?

A: Adoption Day, which is October 18, 2015, marks the date on which the Joint Comprehensive Plan of Action (JCPOA) comes into effect.

Beginning on Adoption Day, JCPOA participants will start taking the steps necessary to implement their JCPOA commitments. Importantly, Iran will now begin taking the nuclear-related measures set forth in the JCPOA, and the United States and European Union will begin the necessary additional work for the implementation of their commitments with respect to sanctions under the JCPOA. Consistent with Annex V of the JCPOA, the United States issued two documents on Adoption Day: the President [issued a Memorandum](#) to the Secretaries of State, the Treasury, Commerce, and Energy to direct them to take all appropriate measures to ensure the prompt and effective implementation of the U.S. commitments in the JCPOA; and the Secretary of State [issued contingent waivers of certain statutory sanctions](#) in preparation for the implementation of U.S. commitments with respect to sanctions under the JCPOA. Importantly, these waivers will not take effect until confirmation by the Secretary of State that the International Atomic Energy Agency (IAEA) has verified that Iran has implemented its key nuclear-related measures described in the JCPOA (Implementation Day).

Q: Do the waivers that were issued on Adoption Day result in the lifting of any sanctions on Adoption Day?

A: No. The waivers issued on Adoption Day are contingent on Iran verifiably taking key nuclear-related steps outlined in the JCPOA, and the waivers do not take effect until the Secretary of State has confirmed that Iran has verifiably taken those steps. Updated guidance from the Department of the Treasury's Office of Foreign Assets Control (OFAC) will reflect this change once it occurs.

The only easing of sanctions in effect before Implementation Day continues to be that provided for under the Joint Plan of Action of November 24, 2013, as extended. Until Implementation Day, all other U.S. sanctions remain in effect, and certain activities involving Iran, such as entering into contracts before Implementation Day with individuals and entities on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List), could expose the parties to sanctions.

Q: When is Implementation Day and what will occur on that day?

A: The timing of Implementation Day and the associated sanctions lifting will depend on when Iran fulfills its key nuclear-related commitments specified in the JCPOA. Once the IAEA verifies that Iran has implemented these commitments under the JCPOA, the United States and

the European Union will implement the first phase of their commitments with respect to the JCPOA, as set out in Annex V of the JCPOA.

On Implementation Day, the lifting of U.S. nuclear-related sanctions described in sections 17.1-17.2 of Annex V of the JCPOA will occur. To make this happen, the contingent waivers issued on Adoption Day by the Secretary of State will take effect as noted above, and certain Executive orders will be terminated as provided for in the JCPOA.

OFAC intends to publish on its website prior to Implementation Day detailed guidance and information on the implementation of U.S. commitments with respect to sanctions under the JCPOA. OFAC will also update its website on Implementation Day to notify the public that the easing of U.S. sanctions pursuant to the JCPOA is in effect.

Even after Implementation Day, U.S. persons will continue to be broadly prohibited from engaging in transactions or dealings involving Iran, including the Government of Iran, with the exception of a few additional categories of transactions that the Treasury Department's Office of Foreign Assets Control (OFAC) will license pursuant to the JCPOA.

Q. Would the entry by non-U.S. persons into contracts involving Iranian entities prior to the JCPOA Implementation Day be sanctionable?

A. Until Implementation Day, all U.S. sanctions against Iran remain in effect, with the exception of the limited relief provided for in the Joint Plan of Action, as extended. Entering into contracts involving Iran or its government before Implementation Day may be sanctionable. In certain circumstances, this could include contracts that are contingent on the implementation of sanctions relief under the JCPOA, such as contracts involving individuals or entities on the SDN List. Until Implementation Day, we will continue to vigorously enforce the sanctions that remain in effect.

As a general matter, unless authorized by OFAC, U.S. persons are prohibited from entering into contracts – contingent or otherwise – involving Iran or its government, including with individuals and entities on the SDN List.