

Kære medlem af Udenrigsudvalget,

Følgende henvendelse er i forlængelse af en række tidligere henvendelser, vedrørende nødvendigheden af at inkludere Irans Revolutionsgarde på EU's liste over terrororganisationer. [\[1\]](#)

Den 19. juni 2025 gentog Europa-Parlamentet i en resolution sin opfordring fra otte tidligere resolutioner, vedtaget i 2023, 2024 og 2025, til Rådet for Den Europæiske Union, om at føje Irans Revolutionsgarde til EU's liste over terrororganisationer. [\[2\]](#)

Af seneste resolution fremgår det blandt andet, at Europa-Parlamentet:

"5. gentager sin opfordring til Rådet om at udpege Den Islamiske Revolutionsgarde som en terrororganisation og til at udvide EU's sanktioner til at omfatte alle dem, der er ansvarlige for gidseltagningen af EU-borgere, massehenrettelser af medlemmer af oppositionen og andre alvorlige menneskerettighedskrænkelser;"

"7. understreger, at forbindelser mellem EU og Iran skal bygge på håndgribelige fremskridt i retning af demokrati, retsstatsprincippet, menneskerettigheder og løsladelsen af alle politiske fanger;"

Ifølge Amnesty International stod Iran i 2023 for 74 % af alle registrerede henrettelser i verden. Det skete med 853 henrettelser, der udgør en stigning på 48 % fra året før. [\[3\]](#)

I 2024 stod Iran for 64% af alle kendte henrettelser i verden, med mindst 972 henrettede personer ifølge Amnesty International, i hvad organisationen kalder regeringens igangværende kampagne for masseundertrykkelse af dissens. [\[4\]](#)

I juli 2025 vedtog Udenrigsudvalget i det belgiske parlament en resolution, der opfordrer EU til at inkludere Irans Revolutionsgarde på EU's terrorliste.

Den nuværende belgiske regering, ledet af Bart De Wever, har bekræftet samme holdning i sin koalitionsaftale, hvori det fremgår at, regeringen går ind for optagelse af Irans Revolutionsgarde på EU's liste over terrororganisationer. [\[5\]](#)

I forbindelse med behandling af beslutningsforslag B 175 i Folketinget blev det klart, at et så godt som enstemmigt Folketing ønsker, at Irans Revolutionsgarde kategoriseres som en terrororganisation i EU. Samtlige partier der udtalte sig i Folketinget er enige om, at den danske regering i EU skal arbejde for, at Irans Revolutionsgarde føjes til EU's terrorliste, og at der foreligger retligt grundlag for dette. Dertil ønsker et flertal i Udenrigsudvalget, at regeringen forstærker bestræbelserne på at dette bliver vedtaget i EU. [\[6\]](#)

I Danmark er retfærdighed således sket fyldest for alle de mennesker, der i de seneste 45 år har været ofre for præstestyrets terrorvirksomhed i og udenfor Iran.

Ifølge en ekspertvurdering, af The Hague Initiative for International Cooperation fra juli 2024, er EU politisk og retligt forpligtet til at føje Irans Revolutionsgarde til unionens terrorliste.

Det konkluderes endvidere at en kategorisering af Irans Revolutionsgarde som en terrororganisation vil have øjeblikkelige, håndgribelige og gavnlige virkninger for borgernes sikkerhed i EU, der ville gå ud over de nuværende sanktionsregimer.

“CONCLUSIONS CONCERNING THE IRGC

34. In light of the foregoing, we conclude that the conditions for inclusion of the IRGC on the EU terror list are satisfied. The Council is both politically and legally obliged to place the IRGC on the EU terror list.

35. For the reasons set out above, in light of the abundance of evidence that it is involved in terrorist acts, there is in our view a legal obligation on the Council to place the IRGC on the list.

36. A decision not to place the IRGC on the list would in fact be a political decision that not only infringes the legal obligation of the EU Member States to take all necessary action to prevent and suppress terror acts, it would conflict with the political obligation to respect the democratic will of the people of the European Union as expressed by the recent resolution of the EU Parliament calling on the Council to place the IRGC on the EU terror list.

37. Contrary to what some argue, the designation of the IRGC as a terrorist organization would have immediate, tangible and beneficial effects for the security of citizens in the EU common area, exceeding the current sanctions regimes. The designation of the IRGC itself would mean a new, strong warning or in practice a higher level of alertness about the ongoing terrorist risk posed by this organization, prompting various mechanisms to enhance exchange of information and judicial cooperation among EU members.

38. Here, Eurojust plays a crucial role as a hub for exchanging information and coordinating investigations and prosecutions. When a terrorist organization is designated, Eurojust ensures that the relevant information about the organization, its connections and activities is promptly shared among national authorities, potentially through the formation of Joint Investigation Teams (JITs) with prosecutors and investigators from different EU countries, aiming to dismantle the designated organization's networks across the common area as early as possible.

39. Likewise, for Europol, which functions as a kind of centralized EU law enforcement agency, the IRGC's designation would enhance its operational capabilities to exchange classified and intelligence-based information among member states in a concerted effort to foil new terrorist attacks and plots by the designated entity on EU soil. Of course, the designation would also facilitate the freezing of funds and restrictions of transfers for the designated entity. Latest developments in the Middle East, including the IRGC's financial and material support provided to Hamas in the years leading to the October 7th attack on Israel, reveal that the ongoing terrorist threat posed by the IRGC has become a pressing EU-wide security concern.

40. EU listing also triggers obligations on Member States under international law to take legislative and executive measures to prevent the IRGC from carrying out terrorist acts.

41. Finally, our report addresses the question how a proposal to list the IRGC should be initiated. Common Position 931 and the COMET WP provide that either the High Representative for Foreign Affairs and Security Policy or Member States are entitled to initiate a proposal for placing a person, group or entity on the list. However, the High Representative, who, on the delegated authority of Member States, is vested to run these matters, is in a better position to initiate the proposal, particularly when the IRGC designation may be based on decisions by competent authorities from third countries and coordination with them will be required. In fact, in our view, the High Representative has a duty to initiate the proposal for placing the IRGC on the list, reflecting the fact that the Common Position 931 was adopted to ensure that the Member States fulfil their obligations under UNSC Resolution 1373/2001 and customary international law on counterterrorism.” [\[7\]](#)

På baggrund af ovenstående må det således forventes, at den danske regering som led i Danmarks formandskab for EU, vil arbejde for inkludering af Irans Revolutionsgarde på EU's terrorliste.

Bedste hilsner,
Poyan Taherloo.