

EU Foreign Policy Identity:

A Case Study on the EU's Engagement of the Islamic Republic of Iran

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Abstract

The Joint Comprehensive Plan of Action (JCPOA) is often referred to as the biggest foreign policy success of the European Union (EU). It ended twelve years of tough negotiations, stabilising one of the most volatile regions of the world. The EU's engagement with Iran was distinct from that of the United States or even that of its member states as it focused on promoting multilateralism and diplomatic dialogue, making the EU-Iran relationship of utmost importance for both parties involved. This paper seeks to answer the research question to what extent the EU possesses a foreign policy identity that is more than the sum of that of its member states and how it expressed this identity in its engagement with Iran. Exploring EU foreign policy identity is important because it explains what type of actor the EU is in the international system and sheds light on the decision-making process of its external action. The study argues that the EU has indeed an own distinct foreign policy identity which reflects its values such as a unique commitment to diplomatic dialogue and multilateralism as the solution to international problems as well as a guarantee to upholding the rule of law in the international system. Through a qualitative content analysis of the American, British and French press as well as expert interviews with EU officials and member states' diplomats the existence and importance of a distinct brand of EU foreign policy identity will be demonstrated.

Introduction

"A sign of hope for the entire world, very much needed in these times". ¹ These are the words that the High Representative of the Union for Foreign Affairs and Security Policy and Vice-President of the European Commission (HR/VP), Federica Mogherini, used to describe the agreement that the EU3+3² reached in Vienna on 14 July 2015. She was referring to the historical breakthrough in a twelve-year period of gruelling negotiations whereby the option of yet another military intervention in the Middle East was avoided and diplomacy triumphed. The position that the European Union (EU) had stood consistently by for twelve years paid off and the bloc now had a successful example of its distinct foreign policy. The Joint Comprehensive Plan of Action (JCPOA) further institutionalised the EU's role, naming the High Representative as the chair of the agreement's Joint Commission and effectively making the EU responsible for the continued implementation of the deal.

Since 2015 the JCPOA has become the flagship of EU foreign policy, bringing the European Union's relationship with Iran to the front of the stage and making it a good case study for examining the EU's foreign policy identity. This study analyses the EU's expression of its foreign policy identity in the JCPOA and its relationship with the Islamic Republic of Iran. It will seek to answer the following research question: to what extent does the EU possess a foreign policy identity that is more than the sum of that of its member states and how has the EU expressed this identity in its engagement with Iran?

Foreign policy identity is a debated concept in the literature. For the purpose of this paper, EU foreign policy identity is defined as "the collective EU cultural practices, norms and values which give expression to and shape its foreign policies and its relations with non-member countries". Exploring EU foreign policy identity is important because it explains what type of actor the EU is in the international system and sheds light on the decision-making process of its external action. The paper argues that EU

¹ F. Mogherini, EU High Representative for the Common Foreign and Security Policy, speech, "JCPOA signing press conference", Vienna, 14 July 2015.

² France, Germany and the UK form the E3, the US, Russia and China are the three other members present in the negotiations. The formation is also alternatively referred to as the P5+1, the five permanent members of the UN Security Council and Germany.

³ E. Johansson-Nogues, The Construction of an EU Foreign Policy Identity: Identitarian Resonance and Dissonance in the European Union's Relations with the Mediterranean, Northern European and Western Balkan Borderlands, PhD thesis, Bellaterra, Universitat Autonoma de Barcelona, 2008.

foreign policy identity goes further than the sum of that of its member states because it reflects a unique commitment to diplomatic dialogue and multilateralism as the solution to international problems as well as a guarantee to upholding the rule of law in the international system.

The paper begins with an overview of EU-lran relations and a discussion of the specificities of the Iran file. It then examines the theoretical literature available on the concept of foreign policy identity. Finally, to assess EU foreign policy identity throughout the negotiations and conclusion of the agreement on Iran's nuclear programme, the author has opted for a research methodology combining a qualitative and quantitative content analysis of the press as well as expert interviews with EU officials and member state diplomats. The press study examines three crucial moments in the EU's engagement with Iran in the French, British and American press. The selected moments are the imposition of restrictive measures on Iran in December 2006, the conclusion of the agreement in July 2015 and the United States' (US) withdrawal from the accord in May 2018.

EU-Iran relations

At a first glance, the relationship between the Islamic Republic of Iran and the European Union might not seem very significant to foreign policy analysts, as Iran is not an important economic partner for the EU. However, the EU-Iran relationship has played an important role in the elaboration of the EU's foreign policy. Not only has it allowed the EU to test all of its arsenal of foreign policy instruments, but also the bloc has had a sustained engagement with Iran since the 1990s, when the Common Foreign and Security Policy (CFSP) started being developed. Thus, the EU-Iran relationship and the JCPOA have witnessed the 'coming-of-age' of the EU as a foreign policy actor, from the birth of the CFSP pillar in the Maastricht Treaty when it was a timid declaratory policy, to an innovative political dialogue in the late 1990s and finally to a comprehensive deal to curb Iran's nuclear activities in 2015.

EU engagement with Iran

EU engagement began in the 1990s, when Iran emerged from its long, bloody war with Iraq and began to look for opportunities to rebuild. In 1992, the European Council

⁴ K. Krippendorff, Content Analysis: An Introduction to Its Methodology, 2nd edn, Thousand Oakes, Sage, 2004.

made the formal decision to reach out to Iran in its Edinburgh Conclusions.⁵ However, due to a number of issues between the 'West' and Iran at this time, the interaction was established as a 'critical dialogue'.⁶

The election of Khatami marked a true turn in EU-Iran relations as the new President showed willingness to compromise or at least to enter into dialogue on a series of subjects which the previous governments had refused to discuss, most notably human rights. The EU rewarded Tehran's acts of good will by transforming its 'critical' dialogue with Iran into a 'comprehensive' one. The talks included negotiations on a Trade Cooperation Agreement. Many in Iran and in the EU hoped that this signalled the normalisation of relations between the two parties.

However, in July 2002, the National Council of Resistance of Iran revealed that the Islamic Republic was enriching uranium in undeclared sites in Natanz and Fordow. Shortly following the revelations, the foreign ministers of France, Germany and the UK travelled to Tehran to discuss the nuclear programme with their Iranian counterparts. Iran represented an opportunity for the burgeoning European foreign policy but also for the EU to mend divisions within its ranks following the invasion of Iraq by a US-led coalition in 2003. The issue of non-proliferation, however, was one that all member states agreed on and this gave the European Union the opportunity to demonstrate once more its commitment to dialogue and multilateralism.

E3 engagement

France, Germany and the UK formed a lead group on the question of Iran's nuclear capabilities. At the beginning, their initiative was purely intergovernmental and certain aspects of this approach remained through the twelve years of negotiations; the file was not left to EU institutions and no other member states joined the delegation. However, as HR Javier Solana joined the initiative, the terms E3, EU3 and EU were used interchangeably. The media did not question the use of one terminology or the other

 $^{^5}$ European Council, "Conclusions of the Presidency: Part D External Relations: Iran", SN/456/1/92 REV 1, 1992, p. 96.

⁶ M. Rubin, "Europe's Critical Dialogue with Iran: An Assessment", *Policy Watch Washington Institute*, Washington, DC, January 2000.

⁷ "EU/Iran Negotiations for Trade & Cooperation Agreement to restart on 12 January", European Commission Press Release database, Brussels, 11 January 2005.

^{8 &}quot;U.S.: Iran working on nuclear weapons", CNN World, 13 December 2002.

⁹ Ibid.

and if they did, they assumed that the three countries acted as representatives for the Union. The E3's interests in engaging with Iran converged in wanting to play a leadership role in international affairs to uphold the international non-proliferation regime. This in turn allowed the group to provide leadership on a position on the Iran nuclear file to which the other members rallied, 10 while also managing to give a sense of ownership to the whole bloc by integrating the successive High Representatives into the process.

EU interests

The EU's interests pertaining to Iran can be divided into four main categories. ¹¹ First, the EU seeks to maintain stability in the Persian Gulf region, which continues to be vitally important for global oil supplies and prices. Second, it seeks to resolve the conflicts in the Middle East, not least in order to prevent further refugee movements toward Europe in the wake of instability and failing states. Third, the EU wishes to diversify its energy supplies by increasing Iranian imports and reducing Europe's significant energy dependence on Russia. Fourth, the EU wants to boost exports of its industrial goods by expanding economic relations with Iran at a time of weak European growth rates over the past decade. The uniqueness of the Iran question came from the convergence of EU interests with an international opportunity to get involved that the EU sought because of its division over Iraq. ¹²

The EU assessed its role, as stated by the Secretary General of the European External Action Service (EEAS) Helga Schmidt, a key figure present through the twelve years of negotiations and the succession of three High Representatives:

Only the European Union could have played that role. No other actor would have been accepted. Russia, China and the US could not have done it, but also none of the EU Member States could have done it. It was only the EU that was accepted because the EU was perceived by both sides as a neutral actor, as a moderator, a facilitator. We were bridge builders in the context between Iran and the US, which continues to be difficult.¹³

¹⁰ Alcaro, op. cit., p. 23.

¹¹ C. Adebahr, Europe and Iran: The Nuclear Deal and Beyond, Abingdon, Routledge, 2018, p. 41.

¹² Ibid.

¹³ H. Schmidt cited in "Europe and Iran: Beyond the Nuclear Deal", *Carnegie Europe*, 17 May 2017, retrieved 16 April 2019, https://carnegieeurope.eu/2017/05/17/europe-and-iran-beyond-nuclear-deal-event-5595

Thus, the relationship between the EU and Iran brought together particular conditions for the EU to exercise its newly born foreign policy in a united and coherent manner.

Challenges and opportunities of EU engagement with Iran

This section looks at the two main challenges which lie within the EU-Iran relationship, namely Iran's human rights record and its regional interference. It also presents the opportunity that the JCPOA represented to institutionalise constructive dialogue between both actors.

Human rights

Since the adoption of the JCPOA and its implementation, the EU has always viewed the deal as a starting point for its relations with Iran. The US has criticised the EU for deciding to separate the nuclear issue from other issues such as regional questions or Iran's human rights record. Since the emergence of the nuclear issue with Iran, nonproliferation has been the EU's utmost priority, which has somewhat side-lined human rights concerns. It is useful to examine this downgrading of human rights through the lens of Normative Power Europe. 14 Ian Manners' famous concept considers the EU's power in the international system as its ability to define what is 'normal'. To do so, the EU deploys a series of mechanisms such as the manipulation of interests, bargaining or persuasion. In the case of Iran, the norms that the EU seeks to promote are human rights and the rule of law, but also non-proliferation. 15 Benjamin Kienzle argues that the mechanism the EU used to promote human rights was not compatible with the one used to promote non-proliferation. Indeed, on the question of human rights, the EU opted for persuasion with dialogues and a minimal level of pressure, whereas on the question of non-proliferation the EU used both sanctions and incentives to get Iran to abandon its military nuclear programme.¹⁶ Nonetheless, human rights remain one of the main challenges to the EU-Iran relationship today. The EU has managed to remain constant in recalling the human rights question on all levels of dialogue with Iran.

¹⁴ I. Manners, "Normative Power Europe: A Contradiction in Terms?", Journal of Common Market Studies, vol. 40, no. 2, 2002, pp. 235-258.

¹⁵ B. Kienzle, "Between Human Rights and Non-Proliferation: Norm Competition in the EU's Iran Policy", UNISCI Discussion Papers, Barcelona, Barcelona Institute for International Studies (IBEI) October 2012.

¹⁶ Ibid.

The regional question

During the negotiations but also following the US withdrawal from the JCPOA in May 2018, the question of Iran's role in disrupting the stability of the region through its support to groups in Syria, Yemen or Iraq have been a point of contention between the EU and Iran. The EU's analysis of the situation converges with that of the US; Iran's destabilising actions must cease. However, the EU has chosen to separate this question from the nuclear file because it views the nuclear file as a question of non-proliferation, whilst it understands Iran's regional actions as a policy which must be resolved by a regional dialogue. The EU has faced much criticism for separating its policies on Iran. This move is inscribed in what HR Mogherini calls the 'dialogue of the 4Cs': "comprehensive, cooperative, critical if needed and constructive always with Iran". The Engaging Iran through the JCPOA establishes a reliable and institutional point of contact on which to build a bilateral relationship.

Opportunities: the JCPOA's institutional framework and trust building

Following the signing of the plan of action in 2015, the EU has found itself endowed with a formal institutional role in dealings with Iran. Indeed, the EU and its HR/VP are the chair and coordinator of the JCPOA's Joint Commission for monitoring the implementation of the deal. The Joint Commission meets regularly, thus creating an opportunity for trust building through regular contact between the signatories. Furthermore, the repeated declarations by the EU of its commitment to the JCPOA following the US withdrawal also strengthened the basis for cooperation between Iran and the EU. For this reason, the EU adopted a package of 50 million euros in 2018 for "sustainable economic development" in Iran with a "focus on assistance to the private sector". This allocation ranges from development cooperation focused on environmental issues, to support to Iranian small and medium-sized enterprises and combating drug trafficking. It builds upon the EU's commitment to facilitate Iran's integration into the global economy and international system. This was also demonstrated right after the signing of the JCPOA, when HR/VP Mogherini visited

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¹⁷ EEAS, "Mogherini leads Commission delegation to Iran: launches 'Dialogue of the 4 C's'", 16 April 2015.

¹⁸ S. Blockmans & A. Viaud, "EU diplomacy and the Iran nuclear deal: staying power?", CEPS Policy Insights, no. 28, Brussels, 2017.

¹⁹ European Commission, "European Commission adopts support package for Iran, with a focus on the private sector", 23 August 2018.

Tehran accompanied by a delegation of seven Commissioners from Internal Market to Transport to Education and Culture.²⁰

The EU's foreign policy identity

Identity is a contested concept in foreign policy analysis. International Relations (IR) theorists do not all agree that identity is even a relevant variable in the decision-making process of foreign policy, at least not at the same level as interests. Likewise, European or EU identity is an equally challenged notion, its very existence is the subject of much debate, let alone its relevance. For the purpose of this paper, EU foreign policy identity is defined as "the collective EU cultural practices, norms and values which give expression to and shape its foreign policies and its relations with non-member countries". ²¹

Keukeleire and Delreux define EU foreign policy as "the area of European policies that is directed at the external environment with the objective of influencing it and its actors to pursue interests, values and goals". ²² This definition provides a broader understanding of foreign policy beyond CFSP to the wider external action of the EU (such as its very active trade policy). External action is the area in which European integration has made some of its most dynamic moves in the last years with institutional innovations like the establishment of the HR/VP and the EEAS or the creation of EU military staff as well as the growing link and coordination between CFSP and exclusive competence areas. ²³

In 1973, the foreign ministers of the nine member states at the time published a declaration on European identity for the purpose of conducting a more coherent foreign policy.²⁴ In this document, the member states highlighted the necessity of defining European identity in order to better constitute the EU's external action. The document mentions several important bilateral relationships for the EU such as that

 22 S. Keukeleire & T. Delreux, The Foreign Policy of the European Union, $2^{\rm nd}$ edn, Basingstoke, Palgrave Macmillan, 2014, p. 1.

²⁰ J. Valero, "Commission embarks on business trip to Tehran, despite renewed sanctions", *Euractiv*, 14 April 2016.

²¹ Ibid.

²³ B. Tonra & T. Christiansen, "The Study of EU Foreign Policy: Between International Relations and European Studies", *SSRN Electronic Journal*, 2011.

²⁴ "Declaration on European Identity (Copenhagen, 14 December 1973)", *Bulletin of the European Communities*, December 1973, no. 12, Luxembourg, Office for Official Publications of the European Communities, pp. 118-122.

with China, the US or the African, Caribbean and Pacific countries. Its most interesting assessment, however, is its statement that

European identity will evolve as a function of the dynamic construction of a United Europe. In their external relations, the Nine propose progressively to undertake the definition of their identity in relation to other countries or groups of countries. They believe that in so doing they will strengthen their own cohesion and contribute to the framing of a genuinely European foreign policy.²⁵

European identity comes as much from member states' integration objectives as it does from their external ones. ²⁶ What is designated as foreign and external strengthens what is seen as native and internal. Moreover, conceptualising European identity as evolving and dynamic allows the concept to be used to answer to future challenges that may arise.

The concept of identity entered IR theory with the development of the constructivist school of thought. Its key tenets are that knowledge, and thus reality, is historically and socially constructed. Constructivism holds that core concepts like power capabilities and threats are actually defined by social interaction, perception and shared ideas. ²⁷ Its scholars also became increasingly interested in integrating the concept of collective identities into the study of the international system. Alexander Wendt's seminal article 'Collective Identity Formation and the International State' argued that identities constitute interests. He defines collective identities as "in part particularistic identities of its members and the relations between them and in part a degree of social structure and actors external to the collective". ²⁸ Collective identities "express a sense of belonging to a distinct group, they provide a system of orientation for self-reference and action". ²⁹ Thus, what is foreign to the group and how said group interacts with it has an importance in defining the identity of the group itself. As Johansson-Nogues argues, the constructivist approach "allows us to contemplate the

²⁶ Keukeleire & Delreux, op. cit., p. 35.

²⁵ Ibid.

²⁷ R. Jackson & G. Sørensen, Introduction to International Relations: Theories and Approaches, Oxford, Oxford University Press, 2010, 4th edn, p. 166.

²⁸ A. Wendt, "Collective Identity Formation and the International State", *The American Political Science Review*, vol. 88, no. 2, 1994, pp. 384-396.

²⁹ L. Aggestam, "Role Identity and the Europeanisation of Foreign Policy: A Political-Cultural Approach", in B. Tora & T. Christiansen (eds), *Rethinking European Union Foreign Policy*, Manchester, Manchester University Press, 2004, p. 82.

possibility that a collective such as the EU may have an 'identity' separable albeit not separate from its member states even if it is not a full-fledged political community".³⁰

Discourse analysis does not seek to explain EU foreign policy but instead to demonstrate the means through which it is being discursively constructed.³¹ This constitutes an added value for assessing EU foreign policy identity because it allows us to study evolutions in its discursive construction as a result of events happening at the time. Moreover, values have an important role in discourse analysis, not in a normative manner but rather as a unit of analysis in discursive practices. In its relations with third countries, the EU uses certain values to position itself vis-à-vis others. Recurrent values in EU foreign policy, both stated by the EU itself and in third-country perceptions of the EU are: liberal democracy and the rule of law, free trade and liberalisation and the peaceful resolution of disputes.

Having set the theoretical and historical contexts of the EU-Iran relationship, the next section explores it specifically in relation to the Iran nuclear deal.

Case study: EU foreign policy identity in the Iran nuclear deal

The following section draws on a qualitative and quantitative content analysis of the press to gauge EU foreign policy identity in the negotiations on the Iran nuclear programme.³² Written press coverage is representative of both civil societies' and governments' positions on foreign policy. As Cook states, the media generally support their government's position on foreign policy even in democratic societies with free press.³³ The written press is also a good indicator for foreign policy identity because it uses frames in its reporting of events. In line with discourse analysis, in the media, frames help people to "locate, perceive, identify, and label" the events with regards to what they already know.³⁴ By studying the framing and recurrent concepts used by the press, it is possible to gain a relevant appraisal of EU foreign policy identity.

³⁰ Johansson-Nogues, op. cit.

³¹ S. Aydın-Düzgit, "Unravelling European Union Foreign Policy through Critical Discourse Analysis: Guidelines for Research", in J.-F. Morin, & C. Carta (eds), EU Foreign Policy Through the Lens of Discourse Analysis: Making Sense of Diversity, Abingdon, Routledge, 2014, p. 133.

³² J. Ritchie & J. Lewis, Qualitative Research Practice: A Guide for Social Science Students and Researchers, London, Sage, 2003.

³³ T. Cook, Governing with the News: The News Media as a Public Institution, Chicago, IL, The University of Chicago Press, 2005.

³⁴ M. Linström & W. Marais, "Qualitative News Framing Analysis: A Methodology", *Communitas*, vol. 17, 2012, pp. 21-38.

To achieve a representative press study from which trends in EU foreign policy can be deduced, the author has decided to sample three newspapers from France, the United Kingdom and the United States; respectively *Le Monde*, *The Financial Times* and *The New York Times*. France and the United Kingdom were chosen for their membership of the E3 lead group which held a crucial role in the negotiations on the Iran nuclear programme from its very beginning in 2003. The United States serves as a point of reference to assess the perception of EU foreign policy identity from the point of view of a third party.

The sample of studied articles have been selected from three specific moments over the twelve-year period of negotiations. For each moment, all articles about Iran generally and its nuclear programme more specifically were reviewed over a period of two weeks. The criteria for the search strategy did not include stories about nuclear non-proliferation but more generally stories about Iran. Thus, the sample captured reports about Iran which were not directly related to its nuclear programme or the negotiations. The articles were taken from the daily printed paper version of the newspaper so as to ensure a comparable sample for the three newspapers.

The first moment is the week before and the week after 23 December 2006, when the United Nations (UN) adopted resolution 1737 imposing economic sanctions on Iran for its non-compliance with the Treaty on the Non-Proliferation of Nuclear Weapons of 1970 of which it is a signatory. This moment was chosen because in 2006 the public had known about Iran's nuclear programme for three years and the press coverage of the UN sanctions would be less impassioned. Furthermore, the EU's original position which sought dialogue at all costs with the Islamic Republic had failed and the Europeans aligned their position with that of the Americans. The importance of this turning point in EU policy towards Iran makes it an interesting event to study.

The second moment selected for the press study was the week before and after 14 July 2015, the date on which the JCPOA was adopted in Vienna.³⁶ This moment was selected because of its importance as the culmination of the twelve years of negotiations on Iran's nuclear programme. It was publicised by both the EU and the

³⁵ United Nations, "S/RES/1737 UN Security Council Resolution 1737: Non-proliferation", *UNdocs.org*, 2006.

³⁶ EEAS, "Iran Deal reached in Vienna", 14 July 2015.

E3 as a historic moment proving the success of diplomacy and multilateralism. It also serves as an engaging contrast to the EU position in 2006.

Finally, the last sample studied is US President Trump's decision to withdraw from the JCPOA on 8 May 2018. This final moment was chosen because of the breakdown it signifies in the transatlantic partnership. The E3 lobbied the Trump administration up to the week before his announcement for the US to remain in the JCPOA. Hence, it is a testing moment for EU values such as effective multilateralism. The EU's perception of itself as an influential actor in the international system was also called into question. Table 1 shows the number of articles about Iran during the three selected time periods.

	Start	End	New York	Financial	Le Monde	Total
			Times	Times		
UN sanctions	16 Dec-	30 Dec-	27	8	8	43
December	ember	ember	21	U	0	43
2006	2006	2006				
JCPOA signing	8 July 2015	22 July	45	18	16	79
July 2015		2015		. 0	. 0	, ,
US withdrawal	1 May	16 May	32	15	18	65
from JCPOA	2018	2018	32	15	10	05
May 2008						

Table 1 Number of articles on Iran

Total

Following content analysis methodology,³⁷ the sample was analysed using a coding framework that sought to capture the presence of the following variables:

104

41

42

187

- Whether or not the EU appeared in headlines;
- Whether or not the EU was mentioned in the body of the text;
- Whether EU/E3 member states were mentioned as actors independent of the Union and the lead group;
- Whether the US was mentioned as the main actor;
- Whether Iranian domestic affairs were the main angle of the article;
- Whether the UN was cited as the main actor or arena for the issue to be resolved;
- Whether regional issues were the main angle of the article (the concrete regional issues varied depending on the moment, Iraq was the main regional issue in 2006, the Islamic State and the war in Syria in 2015 and Israel in 2018);

³⁷ W. Neuman, M. Just & A. Crigler, Common Knowledge: News and the Construction of Political Meaning, Chicago, University of Chicago Press, 1992, pp. 75-82.

- Whether the economic aspects of the issue was the main angle of the article;
- Whether the article included a photography;
- Who was the main personality of the article and which names were recurrent;
- Whether the article was on the front page.

The variables above were chosen for the quantitative and qualitative nature of the data they provided. Quantitative data was taken from the saliency of variables in the sample. Qualitative data was deduced from the tone and framing of the variables. The studied sample was coded manually by the author to reveal the presence of the variables. The content of the articles was also examined for its illustrations and its discussants. This was carried out to see what was portrayed as relevant and who was given a voice.

As a complement and a contrast to the newspaper analysis, the author conducted a few expert interviews with EU officials in a variety of institutions, national diplomats working at the Permanent Representations to the EU and the Brussels correspondent for *The New York Times*. Interviews are a good way of gathering qualitative data for research because they allow the researcher to gauge the manner in which the interviewee is responding and the sentiment he or she expresses. Furthermore, interviews allowed to follow additional leads, for example the development cooperation initiatives between the EU and Iran that did not come up in the press study. The research data gathered from these interviews were used to compare the expression of EU foreign policy identity revealed by the newspaper analysis with the sentiment of EU foreign policy-makers. The same interview guide was used as the starting point for all expert interviews but as the research was qualitative in nature, the questions asked were slightly modified to better fit the position of the interviewee.³⁸

Press study findings

Table 2 shows the prevalence and location of stories on Iran in the studied press.

³⁸ S. Kvale, InterViews: An Introduction to Qualitative Research Interviewing, Thousand Oaks, CA, Sage, 1994. pp. 8-10.

Table 2 Number of front-page stories on Iran

	New York Times	Financial Times	Le Monde
2006	4	2	1
2015	11	1	2
2018	7	2	4
Total	22	4	8

Placing an article on the front page demonstrates the prioritisation of the subject matter for the editor and reflects the discussion in the political spheres.

The following table looks at the presence of photographic illustration with the articles on Iran.

Table 3 Number of articles with pictures

	New York Times	Financial Times	Le Monde	Total
UN sanctions December 2006	0	1	0	1
JCPOA signing July 2015	5	6	2	13
US withdrawal from JCPOA May 2008	5	5	3	13
Total	10	12	5	27

(1) The UN sanctions of December 2006

In the sample of articles studied between 16-30 December 2006, the variables coded appeared as listed in Table 4 below.

Table 4 Number of articles in which each variable was present

	New York Times	Financial Times	Le Monde	Total
EU in headlines	0	0	1	1
EU in text	1	0	1	2
EU/E3 member states mentioned separately	2	2	1	5
US	10	0	0	10
Iran domestic affairs	7	4	3	14
UN	9	1	4	14
Regional issues	8	0	1	9
Economy	0	2	1	3

The data from the studied sample reveals general disregard for the issue of UN sanction on Iran within the European press. Both the *Financial Times* and *Le Monde* published eight articles on Iran (see Table 1). The EU makes it into the headlines in relation to Iran only once, in *Le Monde*, indirectly, not as an actor in its own right but instead as an arena for Iran to use to bypass the US.³⁹ The *Financial Times* does not even mention the EU in its text, focusing instead on specific member states such as France's⁴⁰ or the United Kingdom's⁴¹ relations with Iran.

The Financial Times' main focus in the studied sample is on domestic affairs and more specifically the advance of reformist factions which oppose the hardliner President Ahmadinejad in the municipal elections. Half of the British newspaper's articles are about this subject. 42 For Le Monde, the nuclear programme is the main focus of six articles out of the eight sampled during the timeframe. However, the EU is overshadowed by the UN which is presented as the main actor and decision-maker. The EU imposed restrictive measures on Iran in 2006 as a consequence of the UN Security Council resolution and within the UN's framework. The economic aspect of the sanctions and Iran's isolation in the international system is also a recurrent subject for the European newspapers. The Financial Times devotes an article to the sanctions faced by Total, the French oil company, for engaging in business with Iran, as well as an article on the consequences of the sanctions on Iran's oil industry. In Le Monde the only mention of the EU appears in an article about the Iranian government's effort to replace the dollar by the euro as its currency of choice of international transactions. 43

Across the Atlantic, the *New York Times* frames its articles on Iran quite differently. The American newspaper published practically three times as many articles as its European counterparts on Iran in the studied period. As with the *Financial Times*,

³⁹ "L'Iran souhaite abandonner le dollar et choisir l'euro pour ses transactions internationales", Le Monde, 18 December 2006, p. 1.

⁴⁰ M. Arnold, "Total faces investigation over \$2bn Iran contract", *Financial Times*, 20 December 2006, p. 21.

^{41 &}quot;Iran summons UK ambassador", Financial Times, 27 December 2006, p. 4.

⁴² G. Smyth & N. Bozorgmehr, "Ahmadi-Nejad seeks scent of triumph", Financial Times, 16 December 2006, p. 7; G. Smyth & N. Bozorgmehr, "Ahmadi-Nejad suffers setback in Iran elections", Financial Times, 18 December 2006, p. 8; "Theocratic democracy: Iran's unpredictable voters reveal Ahmadi-Nejad's feet of day", Financial Times, 19 December 2006, p. 18; G. Smyth, "Iran's election likely to bring rethink at the top", Financial Times, 19 December 2006, p. 13.

⁴³ "L'Iran souhaite abandonner le dollar et choisir l'euro pour ses transactions internationales", Le Monde, 18 December 2006, p. 6.

Iranian domestic politics and the municipal elections play an important role in the American newspaper's coverage. However, the *New York Times'* main angle is a reflection of American political concerns at the time, namely domestic sentiment on the war in Iraq. Eight articles mention Iran's Arab neighbour. The discussion of a possible military intervention in Iran is also a reflection of American interventionist policies in the region. It is noteworthy that the coverage does not have any references to Israel at this point. Nevertheless, as with the European press and despite the *New York Times* generally framing the US as the main actor on the issue, the UN is given significant actorness on the question of the Iranian nuclear programme.⁴⁴

(2) JCPOA signing July 2015

Figure 1 shows the distribution of cover stories in the sample of the time period 8-22 July 2015 with a peak in mid-July when the JCPOA was signed.

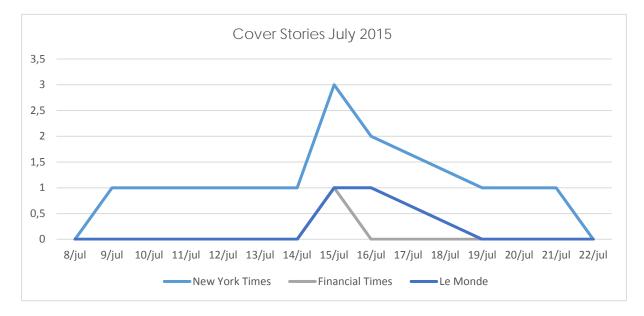


Figure 1 Distribution of cover stories across the sample (July 2015)

In this sample of articles, the variables coded appeared as listed in Table 5 below.

⁴⁴ E. Gootman, "Security Council Approves Sanctions Against Iran Over Nuclear Program", New York Times, 24 December 2006, p. A8.

Table 5 Number of articles in which each variable was present

	New York Times	Financial Times	Le Monde	Total
EU in headlines	0	0	1	1
EU in text	2	4	2	6
EU/E3 member states mentioned separately	2	0	2	4
US	11	8	2	21
Iran domestic affairs	7	3	4	14
UN	5	2	4	11
Regional issues	4	7	5	16
Economy	2	11	4	17

On 15 July 2015, after twelve years of negotiations between Iran and the West, the JCPOA was signed in Vienna. In essence, the agreement lifted UN nuclear-related sanctions on Iran in exchange for the country halting its uranium enrichment and allowing International Atomic Energy Agency inspectors to visit nuclear power plants. The final round of negotiations that led to the conclusion of the JCPOA in 2015 began in 2013 with the interim Joint Plan of Action. 45 This two-year period allowed the negotiations to become mediatised which explains in part the high number of articles in the studied sample for 2015. In the two-week period sampled, the Financial Times published 18 articles on Iran whilst Le Monde published 16 (see Table 1). The significance of these stories to the European press is shown also by the location of the stories in the issues as well as the increasing inclusion of pictures alongside the articles. The nuclear programme and possible deal is the most important subject of articles for the European press. Only one of Le Monde's 16 articles is on Iran's role in fighting the Islamic State in Iraq,46 while the rest of the sample is about the negotiations, conclusion and aftermath of the deal. The same trend is also visible in the Financial Times, where the main subject of every one of the 18 articles sampled is the JCPOA. This focus on the JCPOA within the European press shows the significance of the international agreement. However, the role of the EU is still omitted in the press coverage. The signatories of the JCPOA are referred to in all three newspapers as the P5+1 instead of the EU3+3 designation preferred by EU official communications.

Moreover, the EU appears only in one headline in the European press, in *Le Monde*. The French newspaper notes the EU's decision to delay the lifting of restrictive

⁴⁵ K. Davenport, "Implementation of the Joint Plan of Action at a Glance", Arms Control Association, October 2015.

⁴⁶ H. Sallon, "En Irak, Iran et Etats-Unis alliés malgré eux face à l'El", Le Monde, 16 July 2015.

measures on Iran by six months after the deal was signed.⁴⁷ Although the *Financial Times* does not mention the EU in any of its headlines about the JCPOA, it includes more references to the EU in its text. These are generally associated to the economic power of the EU and the opportunity that the Iranian market offers European companies as it joins the global economy once the sanctions are lifted.⁴⁸ Even in the European press, the success of the deal is mainly attributed to the US President, Barack Obama.⁴⁹ The *Financial Times* cites Iranian President Hassan Rouhani on this subject. Rouhani had resumed his strategy as focusing on the "village chief" [the US] instead of "lower ranking figures" [the EU].⁵⁰ This sentiment that the US was needed for the deal to take place is present in the press coverage of the three studied newspapers, discrediting the work EU foreign policy put into the negotiations before the US joined.

In the *New York Times'* coverage too, Obama and his Secretary of State, John Kerry, are credited with the success of the deal.⁵¹ It is referred to as the "biggest achievement of his [Obama's] presidency".⁵² However, the American newspaper focuses its reporting on the challenges ahead, with strong opposition domestically in Congress⁵³ but also regionally with the US' partners in the Middle East.⁵⁴ With regards to the EU, the *New York Times* still does not consider the bloc to be a main actor in the negotiations and conclusion of the deal but references to the EU are increasingly present in the articles. The HR/VP Federica Mogherini is even pictured in an article about the negotiations.⁵⁵

The photographic content of the 2015 sample does not vary much across the three newspapers. Photos of the JCPOA negotiating teams during the negotiations

⁴⁷ "L'Union européenne prolonge de six mois le gel des sanctions contre l'Iran", Le Monde, 14 July 2015.

⁴⁸ A. Sharman, "Carmarkers jostle for pole position as race for Iran begins", *Financial Times*, 16 July 2015, p. 19.

⁴⁹ "Editorial: Iran, un accord prometteur", *Le Monde*, 15 July 2015; D. Sevastopulo & G. Dyer, "Obama gambles of ending years of bad blood", *Financial Times*, 15 July 2015, p. 2.

 $^{^{50}}$ N. Bozorgmehr, "Agreement vindicates Rouhani's focus on the 'village chief'", Financial Times, 15 July 2015, p. 2.

⁵¹ D. Sanger, "Obama's leap of faith on Iran", New York Times, 14 July 2015, p. A1.

⁵² M. Gordon & D. Sanger, "Deal Reached on Iran Nuclear Program; Limits on Fuel Would Lessen With Time", New York Times, 14 July 2015, p. A1.

⁵³ J. Steinhauer & J. Weisman, "White House Lobbying Democrats and Independents to Support Iran Nuclear Deal", New York Times, 15 July 2015, p. A12.

⁵⁴ I. Kershner, "Iran Deal Denounced by Netanyahu as 'Historic Mistake'", New York Times, 15 July 2015, p. A11.

⁵⁵ M. R. Gordon & D. Sanger "Talks on Iran Nuclear Deal Are Extended Once Again", *New York Times*, 8 July 2015, p. A 3.

and presenting the deal at the final press conference are present in all three periodicals. The *New York Times* and the *Financial Times* focus these images on John Kerry whilst *Le Monde* focuses on Federica Mogherini.

Another recurring image is that of the Iranian youth celebrating in the streets of Tehran following the announcement of the deal. All three newspapers include images of these celebrations in their 15 July issue, the day after the announcement of the deal, demonstrating their desire to bring attention to the people of Iran who were set to gain a lot from the end of the country's international isolation.

(3) US withdrawal from JCPOA May 2018

In the sample of articles studied between 1-16 May 2018, the variables coded appeared as listed in Table 6 below.

Table 6 Number	of articles in	which each	variable wa	s nrasant
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	New York Times	Financial Times	Le Monde	Total
EU in headlines	2	4	2	8
EU in text	7	9	8	24
EU/E3 member states mentioned separately	2	2	4	8
US	14	1	5	20
Iran domestic affairs	2	1	1	4
UN	2	0	1	3
Regional issues	10	2	4	16
Economy	2	4	3	9

On 8 May 2018, Donald Trump fulfilled his 2016 campaign promise and withdrew the US from the JCPOA,⁵⁶ even though IAEA reports from July 2015 to May 2018 had continuously confirmed than Iran was abiding with its commitments.⁵⁷ Trump not only withdrew from the JCPOA, he also announced the re-imposition of previous sanctions on the Islamic Republic as well as the addition of new, harsher sanctions.⁵⁸ EU leaders had been lobbying the American President to remain in the accord and French

⁵⁶ "Remarks by President Trump on the Joint Comprehensive Plan of Action", White House. Gov, 8 May 2018.

⁵⁷ F. Murphy, "Iran still holding up its end of nuclear deal, IAEA report shows", Reuters, 22 February 2019, retrieved 10 April, https://www.reuters.com/article/us-iran-nuclear-iaea/iran-still-holding-up-its-end-of-nuclear-deal-iaea-report-shows-idUSKCN1QB1XC

⁵⁸ K. Breuninger, "Here are the sanctions that will snap back into place now that Trump has pulled the US out of the Iran nuclear deal", *CNBC*, 8 May 2018.

President Emmanuel Macron even addressed the US Congress on this subject.⁵⁹ In the two-week period sampled between 1-16 May 2018, the *Financial Times* published 15 articles on Iran and *Le Monde* published 18, four of which made it to the front page (see Table 1).

Divergences between the EU and the US on Iran became increasingly mediatised, leading to the EU being referred to as an actor in its own right. On 11 May 2018, the *Financial Times* publishes the article "How Europe should react to Trump", 60 in which the journalist highlights the ineffectiveness of European leaders in convincing Trump through appeasement and calls for the EU to stand by its own foreign policy. *Le Monde* also follows this line of argument in its article "L'Europe doit convaincre l'Iran de rester dans l'accord", which underlines once more European actorness and opportunity for leadership on the survival of the JCPOA. 61 The EU is portrayed in both European newspapers as an alternative to Trump and American foreign policy more generally. The coverage of how individual member states will be affected by the US withdrawal and re-imposition of sanctions is treated with an EU angle. For instance, *Le Monde* dedicates an article to an overview of trade relations between France and Iran 62 which includes the discussion of EU options in the aftermath of the US extraterritorial sanctions. The *Financial Times* also focuses on the effect of US withdrawal on European companies and looks to the EU for the answer.

Even the *New York Times* includes the EU in its headlines twice. However, the American perspective focuses less on the opportunity for EU leadership and more on the blow to the transatlantic relationship. Its Brussels correspondent Steven Erlanger titles his article "Europe, Again Humiliated by Trump, Struggles to Defend Its Interests" the day following the US announcement.⁶³ Although the *New York Times* takes a stance against Trump's action in its editorial of 9 May titled "Where's that Better

⁵⁹ J. Oliphant & M. Pennetier, "France's Macron visits Trump as Iran nuclear deal hangs in balance", 23 April 2018, retrieved 10 April, https://www.reuters.com/article/us-usa-france/frances-macron-visits-trump-as-iran-nuclear-deal-hangs-in-balance-idUSKBN1HU0E9

⁶⁰ P. Stephens, "How Europe should react to Trump", *Financial Times*, 11 May 2018, p. 5.
⁶¹ R. Malley, "L'Europe doit convaincre l'Iran de rester dans l'accord", *Le Monde*, 9 May 2018, p. 8.

 $^{^{62}}$ C. Chazal, "Quelles sont les relations commerciales entre la France et l'Iran ?", Le Monde, 9 May 2018, p. 10.

⁶³ S. Erlanger, "Europe, Again Humiliated by Trump, Struggles to Defend Its Interests", New York Times, 9 May 2018, p. A1.

Deal?",⁶⁴ the American newspaper's coverage shows little interest or hope in an EU position to counter Trump. Instead, the *New York Times* reporting focuses on US domestic politics such as the influence of the pro-Israel lobby American Israel Public Affairs Committee⁶⁵ or Trump's personal distaste for John Kerry, lead negotiator of the JCPOA.⁶⁶

Trends across the three studied moments

By comparing the three moments, this study revealed an evolution in the perception of the EU as a foreign policy actor on the issue of Iran's nuclear programme. In 2006, the EU was not considered as a relevant player and is hardly mentioned by the three newspapers. The UN was the main reference both for setting the rules and for going ahead despite the EU having been involved in the negotiations longer. Non-proliferation was listed as a priority for EU foreign policy but as working within the UN framework, as stated in Article 3(5) TEU. In 2015, the success of the nuclear deal negotiations was largely attributed to the US. Yet, the EU was mentioned as an arena but also as a relevant actor. For example, Federica Mogherini was quoted for the first time in this sample and her position as High Representative was thus legitimised. Finally, in 2018, the EU was portrayed as an alternative to the US' foreign policy and as the only agent in the international system able to keep the JCPOA alive after the American withdrawal. Whether or not the EU can fulfil this role is not as important as the fact that it was seen as having the capabilities to do so in the media. The evolution of the Iran nuclear programme witnessed the 'coming of age of EU foreign policy' 67.

The newspaper analysis also sheds light on the perception of the EU. For instance, the EU is often associated to economic concerns in the press study, either in articles about the commercial opportunities of a normalisation of relations with Iran or about the effect of EU restrictive measures on Iran. The economic weight of the EU in the international system gives it credibility and relevance in international affairs. 68 When negotiating with a country isolated from the international system such as Iran, the

^{64 &}quot;Where's That Better Deal?", New York Times, 9 May 2018, p. A26.

^{65 &}quot;Netanyahu's Flimflam on Iran", New York Times, 2 May 2018, p. A24.

⁶⁶ L. Qiu, "Trump Takes Aim at Kerry — Again — Ahead of Announcement on Iran Deal", New York Times, 8 May 2018, p. A6.

⁶⁷ C. Adebahr, Europe and Iran: The Nuclear Deal and Beyond, Abingdon, Routledge, 2019, p. 3.

⁶⁸ C. Damro, "Market Power Europe", *Journal of European Public Policy*, vol. 19, no. 5, 2012, pp. 682-699.

commercial opportunities the EU can offer makes it a welcome partner. Furthermore, in the 2018 moment the media's view of the EU matches its perception of itself as it is most associated with the maintenance of a rule-based international order by upholding the JCPOA. Preserving the international legal regime is stated as one of the EU's foreign policy objectives in Article 21 TEU and is a crucial element of the Union's foreign policy identity. This is perhaps the most significant aspect of the JCPOA for EU foreign policy identity: it allows the EU to assert its foreign policy values. The EU strove to uphold the international legal regime throughout the entirety of its twelve-year engagement with Iran on the nuclear issue. Indeed, promoting non-proliferation and the NPT is also part of the norms which govern and regulate the international system. As is the EU's continued preference for engaging Iran multilaterally and privileging a diplomatic approach over any other options.

Expert interviews

The expert interviews confirmed the trends revealed by the newspaper analysis such as the EU's increasing importance throughout the process. They add to the study because they go further by explaining factors that contribute to the formation of EU foreign policy identity in the Iran nuclear negotiations and the subsequent agreement.

A recurrent comment during all the interviews conducted was how little the EU role in the process which culminated in the JCPOA had to do with Iran itself. EU officials and Permanent Representation diplomats viewed the EU's foreign policy identity regarding the nuclear dossier as resulting from the EU's values or its place in the international system rather than from the EU-Iran bilateral relationship. This meant that Iran's different cultural system and its identity as an Islamic Republic had little incidence on the EU's position. It also meant that there was something intrinsically European about the EU's way of doing foreign policy that could not be justified by this particular relationship with Iran. The interviewees overall agreed that this was due to the EU's attachment to certain values. These values – multilateralism, proclivity for diplomatic solutions or upholding the rule of law – are the result of the European experience of integration.

Moreover, interviewees often used the US and its policy towards Iran as a point of reference for assessing EU policy towards the Islamic Republic. Although the press study demonstrates that Iran is a more mediatised subject in the US, the EU is more

affected by issues in Iran because of its geographical proximity. Unlike many of the other states in the Middle East, Iran is not a member of the European Neighbourhood Policy but, as one EU official stated, "Iran is the neighbour of our neighbours". 69 Iranian affairs can thus have direct consequences on the EU. For example, armed conflict in the Middle East creates migration flows towards Europe. Thus, interviewed EU officials explained the prioritisation of engaging Iran as a security concern. Evidently, the nuclear capability of a 'rogue state' is a security concern for the entirety of the international system but Iran's geographic proximity with Europe strongly taints the EU's policy towards it. Unlike the US, the EU prioritises stability over regime change. In recent years, stability in the Middle East has become a priority for the EU across multiple policy areas and most notably migration, making the security component an important one in EU foreign policy identity.

Interviewees agreed that the specificity of EU engagement with Iran on the nuclear programme is a strong example of EU values. The EU's engagement began with a desire to promote multilateralism and diplomatic solutions in 2003, in a context where the US was leading a military intervention in Iraq. This commitment to multilateralism and diplomatic solutions remained relevant following the US withdrawal of the JCPOA in May 2018. The EU pledged its support to the deal immediately after the US withdrew and has stood firmly by it ever since, explicitly citing its belief in multilateralism.⁷⁰

Moreover, throughout the process, the EU has remained open to dialogue with Iran, even when it imposed restrictive measures on the country. Since the JCPOA was signed in 2015, the EU has sought to open new avenues for dialogue with Iran because it believes that confidence building between the two parties is the key to changing Iran's behaviour regarding regional actions or its dire human rights record. This belief is the reason why since the implementation of the JCPOA, the EU has allocated 50 million euros in bilateral cooperation to Iran, despite the country being a middle-income country. Today, the EU seeks to expand cooperation with Iran in other sectors

⁶⁹ Interview with an official, EEAS, Brussels, 2 April 2019.

⁷⁰ Joint statement by High Representative Federica Mogherini and Foreign Ministers Jean-Yves Le Drian, Heiko Maas and Jeremy Hunt, and Finance Ministers Bruno Le Maire, Olaf Scholz and Philip Hammond, Brussels, 2 November 2018.

⁷¹ Interview with an official, DG DEVCO, European Commission, via telephone, 5 April 2019.

⁷² "European Commission adopts support package for Iran, with a focus on the private sector", International Cooperation and Development, 23 August 2018, retrieved 10 April,

such environmental policy or combating the drug routes from Afghanistan with transit through Iran to Europe. ⁷³ In this approach, the JCPOA was the first step in engaging Iran. Separating the nuclear agenda from the other issues allowed the EU to address the most urgent of its concerns with Iran and reach a multilateral deal. The EU's commitment to this order has been put to the test by the US withdrawal but as the launch of the Instrument in Support of Trade Exchanges (INSTEX) and the activation of the blocking statute prove, the EU is seeking to prepare itself for independence from the American system. ⁷⁴

A final noteworthy element on EU foreign policy identity vis-à-vis Iran's nuclear programme is that the bloc has benefited from great unity within its ranks. As CFSP decisions are to be taken unanimously, unity is very important for having an effective EU foreign policy. For the JCPOA, the strong EU values which the accord represented were conducive to EU unity on the subject. Non-proliferation is a norm that is agreed upon by all member states and often referred to as an EU foreign policy objective.

Obtaining Iran's curtailment of its uranium-enriching activities through a multilateral accord was a significant success for a relatively young European diplomacy. The EU's role was further enshrined in the HR/VP's role as chair of the JCPOA Joint Commission and the role of the EEAS in supporting her. 75 Furthermore, the UN framework and the existence of the IAEA as a point of referral and reference for the negotiation further reinforced the EU's unity. The EU welcomes the legitimacy it gets from working alongside the UN. The combination of all these elements led the EU to benefit from an exceptional level of unity in its engagement with Iran on its nuclear programme. This in turn allowed the EU to formulate a clear, coherent and consistent policy which even in the face of the US withdrawal from the JCPOA has remained unwavering.

https://ec.europa.eu/europeaid/news-and-events/european-commission-adopts-support-package-iran-focus-private-sector_en

⁷³ Interview with Sean Kelly, MEP member of the European Parliament's Delegation on Iran, via telephone, 9 April 2019.

⁷⁴ Ibid

⁷⁵ Interview with Steven Erlanger, New York Times Brussels correspondent, via telephone, 10 April 2019.

Conclusions

This paper has sought to answer the question to what extent the EU possesses a foreign policy identity that is more than the sum of that of its member states and how it expressed this identity in its engagement with Iran. The analysis of the international press as well as the expert interviews showed that the EU has a distinct foreign policy identity when it comes to its engagement with Iran and its role in the JCPOA. The EU expresses a strong commitment to multilateralism and diplomatic dialogue vis-à-vis Iran that the US or even the EU member states taken individually do not. This approach to engaging Iran diplomatically was consistent in EU foreign policy throughout the twelve years of negotiations on the JCPOA but also since its implementation. The EU has continued to seek dialogue through any possible area of cooperation.

This study has drawn on theoretical concepts from International Relations and discourse analysis to create an analytical framework to demonstrate this argument. It has shown that the notion of foreign policy identity is relevant to EU foreign policy analysis in the JCPOA. The data gathered through the newspaper analysis and the expert interviews has further corroborated the existence of a distinct brand of EU foreign policy. The place of values has been highlighted in the EU's role in the JCPOA, most notably its commitment to multilateralism and to diplomatic dialogue. These values are the result of the EU's experience of integration and are an expression of its identity as an actor in the international system.

The newspaper analysis provided quantitative data as to the image the EU presents in the international system. Most significantly, the press study showed the increasing importance given to the EU as an actor throughout the years. It also revealed a trend across the three newspapers that presented the EU as the solution to the gap left by the US after its withdrawal from the JCPOA. Finally, the press study allowed to gain insights into the perceived importance of the JCPOA outside decision-makers circles.

The expert interviews provided qualitative data for the assessment of EU foreign policy identity. They explained the key components behind the EU's foreign policy identity in its engagement with Iran. These insights into the perception of policy makers allowed to gain a better grasp on the prioritisation of EU values. It also made clear how exceptional not only the context for the EU engaging Iran was but also the tailored

nature of EU foreign policy tools for this task. For example, the E3 lead group model, which allowed the EU to have a rapid reaction once Iran's uranium enrichment was announced in 2003, sought an aligned foreign policy position following the division caused by the intervention in Iraq. Moreover, the EU used all of the foreign policy tools at its disposal on the Iran file. If military intervention had been opted for, the EU would not have been able to exercise any influence on the question. This is to say that the EU's effectiveness in engaging with Iran might be difficult to replicate on other foreign policy issues.

Nevertheless, the foreign policy identity expressed by the EU in its engagement with Iran and the nuclear file indicate the capacity of the EU to fulfil a role distinct from that of its member states in the international system. Going forward, facing US withdrawal and the re-imposition of extraterritorial sanctions on European companies trying to work and invest in Iran, the EU's foreign policy identity as guarantor of the rules-based international order will continue to be questioned. To truly tackle this challenge, the EU will have to work on asserting its economic independence from the US-dominated financial system. Preserving the JCPOA has alerted the EU as to the limits of its economic power and it must now seek more long-term strategies on internationalising its own financial system. Initiatives like the E3's INSTEX, the special purpose vehicle meant to circumvent US sanctions by trading goods for goods, are a first step in this direction. However, the results of this policy will be slow to come, and in the meantime, Tehran must continue to sell the deal at home whilst facing rampant inflation and unemployment. So far, the Iranian government has shown no signs of wanting to leave the JCPOA but as discontent grows, the government will have a harder time silencing its hardliners. The EU will have to continue investing in Iran and prove to Tehran that it is to its benefit to remain in the JCPOA and on the right side of the rules-based international order.

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