Norm subsidiarity in the practice of diplomacy: A case analysis of Iran's nuclear programme

by

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Ethics statement

I, **Jacques Kuun**, have obtained, for the research described in this work, the applicable research ethics approval.

I declare that I have observed the ethical standards required in terms of the University of Pretoria's Code of ethics for researchers and the Policy guidelines for responsible research.

Abstract

This research studies norm subsidiarity in the practice of diplomacy. Norm subsidiarity is a concept found within norm diffusion scholarship. It is argued that this scholarship gives a privileged position to materially strong actors in its explanation of norm diffusion. The role of weaker states to support international norms is often ignored. Norm subsidiarity explains how materially weaker states support international norms to protect their autonomy from stronger actors. This research demonstrates the application of norm subsidiarity by tracing the history and context surrounding the diplomacy of Iran's nuclear programme from its inception in 1957 to the present. Iran has successfully supported the norm of the peaceful use of nuclear energy by continuing to develop its nuclear programme. This is despite overwhelming international pressure from much stronger states who seek to stop this programme. The analysis shows that Iran's actions can be described as a process of norm subsidiarity. This provides credibility to the argument that weaker states can play an important role in successfully supporting international norms, despite the desires of much stronger states.

Keywords: Norm subsidiarity, Norm diffusion, Diplomacy, Social constructivism, Agency, Identity, Iran, Nuclear energy, Nuclear proliferation

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"Without education we are in a horrible and deadly danger of taking educated people seriously"

G. K. Chesterton

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List of acronyms and abbreviations

CENTO	Central Treaty Organization
EU-3	Britain, France, and Germany
EURATOM	European Atomic Energy Community
HEU	Highly enriched uranium
IAEA	International Atomic Energy Agency
IO	International organization
IRT	International Relations Theory
JPOA	Joint Plan of Action
JCPOA	Joint Comprehensive Plan of Action
NAM	Non-Aligned Movement
NGO	Nongovernmental organization
NPT	Treaty on the Non-Proliferation of Nuclear Weapons
P5+1	The United States, Britain, France, Russia, China, and Germany
R&D	Research and development
UN	United Nations
UNSC	United Nations Security Council
WMDs	Weapons of Mass Destruction

1. Introduction

1.1. Introduction

This research focuses on norm subsidiarity in diplomatic practice. Applying norm subsidiarity to the diplomacy surrounding Iran's nuclear programme, it also contributes to the third "wave" of norm diffusion scholarship. This research argues that materially weaker states have significant agency to promote international norms to protect their autonomy from stronger states who violate these norms. Weaker states are those with relatively weak economies, militaries, and political influence.

Norm subsidiarity is a concept within norm diffusion scholarship. Norm diffusion is an area of scholarly interest found mainly within social constructivism. Social constructivism emphasises the role of norms in international relations. Norms, "standards of appropriate behaviour" (Finnemore & Sikkink 1998: 891), are important for diplomatic studies and international relations. This is because actors develop relations with each other through norms (Hopf 1998: 173). Diplomacy is concerned with how states interact with each other. Norms influence these interactions by defining which interactions are appropriate.

Norm diffusion is the process whereby norms travel between states, how norms change during this process, and how and why norms are resisted or adapted. Norm diffusion scholarship became important in the 1990s when scholars wanted to know why an increasing amount of states were adopting norms surrounding democracy and human rights.

As norms diffuse and change, they alter acceptable diplomatic behaviour. What were formerly considered "appropriate" interactions may become inappropriate. As norm diffusion is always ongoing, there will always be diplomatic interactions characterised by states disagreeing with the appropriateness of each other's actions. This leads to diplomatic events where states defend local or international norms, or try to convince each other of the validity of one norm over another. This might even include enforcing their preferred norms militarily, or pressuring each other through sanctions or social pressure. Understanding and studying norms and how they diffuse and influence behaviour is therefore a crucial component to understanding and studying diplomacy.

More specifically, focusing on norm subsidiarity, and the role of weaker states in resisting and promoting norms, also contributes to the study of diplomacy. The role of weaker states in supporting international norms is often neglected. Instead, the emphasis is usually on weaker states merely accepting or rejecting international norms altogether.

The norm diffusion literature in social constructivism, especially the first two "waves" of scholarship (from about the 1980s to middle 2000s), has prioritised the role of materially powerful states in norm diffusion (Bettiza & Dionigi 2015: 623; Steinhilper 2015: 538). The first two waves do not give adequate attention to weaker actors. They ignore how weaker actors can reject international norms or support them against the desires of stronger states who seek to violate them (Acharya 2011: 96; Steinhilper 2015: 537). By focusing on stronger states, these two waves implicitly adopt a materialist conception of state agency: they do not take seriously the normative ability of materially weaker states to successfully resist or support international norms against the wishes of materially powerful states. This leads to a lack of study on the influential role of materially weak states in norm diffusion in general and their support of international norms in particular.

This research therefore also responds to Acharya's (2014: 651-652) request that scholars allow for multiple forms of agency. Agency is not only material, but also ideational. This difference allows for an ideational role to be played by materially weaker states. States have an ideational capability that is not necessarily determined by their material capability. As Acharya (2014: 652) puts it, "Agency is not the prerogative of the strong. It can manifest as the weapon of the weak". Weaker states have significant agency in reinterpreting, challenging, adapting, reinforcing and creating new international norms. The research problem can therefore be stated as follows:

Research Problem: The norm diffusion literature undertheorizes the processes and mechanisms whereby materially weaker states support international norms to resist the actions and norms of more powerful states.

The third wave of norm diffusion scholarship (roughly from the middle 2000s to the present) gives more attention to how weaker states contest international norms and how weaker states are able to diffuse norms to stronger states. Norm subsidiarity falls within this wave. This concept was developed by Acharya (2011). Norm subsidiarity focuses expressly on weaker states and how they reject or amplify international norms to protect their autonomy from powerful states.

Norm subsidiarity is a process whereby materially weaker states challenge global norms or strengthen them. It therefore either has a resisting or strengthening effect. Weaker states either reject international norms by developing their own norms, or they reinforce international norms to protect their autonomy from stronger actors who violate those norms (Acharya 2011: 96-97; Lee & McGahan 2015: 538-539).

The second aspect, weaker states amplifying international norms, is particularly understudied. The emphasis in norm diffusion scholarship, even within the third wave, is usually on weaker states accepting international norms; adapting them in local contexts; changing them on the international level; or diffusing norms to powerful states. Discussions on the positive role of weaker states in supporting existing international norms as they stand are rare. This also ties in with the materialist bias in constructivist norm diffusion scholarship. It is assumed that weaker states cannot or will not support international norms in any meaningful way.

Norm subsidiarity is important for studying diplomacy as an institution. Institutions are "relatively stable collection[s] of practices and rules defining appropriate behaviour for specific groups of actors in specific situations (March & Olsen 1998: 948). The key word is "collection". Institutions are collections of norms. They are collections of individual standards of behaviour (Finnemore & Sikkink 1998: 891). Studying an individual standard – an individual norm – in an institution, helps us to study the institution itself. Studying norms and norm diffusion therefore helps us to study institutions.

Diplomacy can be understood to be an institution as it establishes a set of rules and norms standardizing relations between states (Bátora 2005: 44, 49). It provides a shared logic of appropriateness to facilitate communication between countries by providing a shared set of rules, identity, values and principles. Diplomacy, as an institution, therefore also consists of a collection of norms. As individual norms change, diplomacy as an institution also changes. Onewould expect diplomacy to change as new norms emerge, diffuse, are contested, and influence state behaviour. Studying norms thus helps one to study diplomacy.

More specifically, norm subsidiarity as a process within norm diffusion will also affect diplomacy at large. It details the processes and motivations whereby states deny international norms or support them. These processes are seen in diplomacy when a weaker state seeks to frustrate a powerful one by using international norms against the latter. The research question can therefore be outlined as:

Research question: How does norm subsidiarity, exercised through the practice of diplomacy, help us to better understand the ability of weaker states to promote international norms?

The diplomacy around Iran's nuclear programme will help to address the research question. Iran is an extremely weak state relative to its opponents: the P5+1 (America, Britain, France, Russia, China, plus Germany). Iran is militarily and economically inferior to both the P5+1, as well as Iran's regional rivals, including Saudi-Arabia, Turkey, and Israel. Analysing Iran's behaviour will therefore help to illuminate the capability of a materially weak state to resist much stronger actors.

Furthermore, the diplomatic conflict around Iran's nuclear programme is linked to two widely accepted international norms: sovereignty and the right to peaceful uses of nuclear energy. Both Iran and the P5+1 support these norms, although they accuse each other of violating these norms. Iran's support of these international norms helps to focus attention on the positive role of weak states in supporting existing international norms.

Iran's actions can be described as an example of norm subsidiarity. Iran believes that international actors, in particular the West, are violating deeply held Iranian norms, especially Iran's sovereignty and its right to peaceful uses of nuclear energy. Attempts by these actors to impede Iran's cognitive priors (sovereignty and self-determination) serve as "triggers" (Lee & McGahan 2015: 538), which set norm subsidiarity in motion. Iran believes that international actors are hypocritical and are excluding Iran from negotiations. As such, Iran continually reinforces the norm of peaceful uses of nuclear energy to protect its autonomy from these international actors. Conversely, where Western actors include Iran, treat Iran as an equal, and respect its cognitive priors, they are often able to reach a solution.

Iran's nuclear programme and the diplomacy surrounding it is still relevant in 2019. Iran has been largely successful in its support of these two norms. Iran has refused to give in to the demands of the much stronger P5+1, who have used crushing sanctions to try to force Iran to stop its nuclear programme. The P5+1, in essence, have tried to force Iran to violate the international norms of peaceful uses of nuclear energy, and state sovereignty. This gives credibility to the main argument. Weaker states, in this case Iran, have significant ideational agency to support international norms despite violations by much stronger states. This research therefore has a clear aim:

Research aim: To challenge the assumption of the first two waves of norm diffusion scholarship that materially weak states have little or no agency to promote international norms against the will of materially powerful states.

This aim will be achieved by addressing three objectives:

Research objectives:

- To critically assess the assumptions in the first two waves of norm diffusion scholarship with regards to weaker states being able to support international norms
- To apply the concept of norm subsidiarity to the diplomacy surrounding Iran's nuclear programme
- And to thereby demonstrate that materially weaker states have significant ideational agency to successfully support and promote international norms in spite of the behaviour of more powerful states.

1.2. Literature overview

This research addresses a number of concepts and articles related to norm diffusion. These can be loosely grouped into three distinct "waves". The first wave was prominent in the 1990s, the second in the early 2000s, and the third from the late 2000s to the present.

The first wave focuses on "universal", positive norms such as human rights. It prioritises the role of international organizations (IOs) and nongovernmental organizations (NGOs), and the prominent role that they play in diffusing international norms. The most prominent models to account for norm diffusion in this wave include the life-cycle model (Finnemore & Sikkink 1998), boomerang model (Keck & Sikkink 1999), and the spiral model (Risse, Ropp & Sikkink 1999). These models have an overwhelmingly "top-down" focus. They give little or no agency to states adopting international norms.

The second wave addresses this criticism. It includes various models that explain how and why international norms are changed by norm-adopting states in domestic contexts to suit their prior normative backgrounds. The most important models here include cultural match (Checkel 1999), norm localization (Acharya 2004), and vernacularization (Levitt & Merry 2009).

Both the first and second waves have an implicit assumption that norms can only be diffused from materially more powerful states down to weaker states. The second wave only gives

agency for these weaker states to change these norms in their own domestic contexts. Neither the first nor the second wave allows for the possibility that weaker states can promote their own norms to stronger states. Furthermore, neither of these two waves allows for weaker states to change international norms in the international environment. Importantly, they also do not take seriously the ability of weaker states to successfully support international norms in the face of norm violations.

The third wave therefore concentrates on how materially weaker states contest and change international norms, promote their own norms internationally, or outright reject or reinforce international norms. It challenges the tendency in prior waves to assume a linear strong-to-weak norm diffusion process (Zwingel 2012: 118; Steinhilper 2015: 538). Bettiza & Dionigi (2015) and Steinhilper (2015) demonstrate successful cases of diffusion from weaker states to stronger ones. Panke and Petersohn (2016), Zimmerman, Deitelhoff and Lesch (2017), and Acharya (2013) emphasise the importance of norm contestation. Lastly, Acharya (2011) outlines the concept of norm subsidiarity.

Norm subsidiarity is of particular importance as it speaks directly to the research question. This concept has been developed by Acharya (2011) in his article, "*Norm Subsidiarity and Regional Orders: Sovereignty, Regionalism and Rule-Making in the Third World*". Norm subsidiarity shows that weaker states often resist foreign norms, export their own norms, and use existing international norms to constrain the actions of materially more powerful states. They do so to protect their autonomy from more powerful states. Norm subsidiarity is set in motion if the weaker state perceives that a stronger state is being hypocritical by violating international norms or is excluding the weaker state from negotiations (Acharya 2011: 97-99).

This research will also pay attention to Lee and McGahan's article (2015), "*Norm subsidiarity and institutional cooperation: Explaining the straits of Malacca anti-piracy regime*". They develop on Acharya's concept by arguing that cognitive priors can trigger norm subsidiarity as well (Lee & McGahan 2015: 538).

1.2. Research methodology

1.2.1. Research approach

A qualitative approach is employed for this research. A qualitative approach studies the complexity of a phenomenon in its natural setting to understand varied layers of the issue under

study. It seeks to understand the meanings people ascribe to a problem to inductively establish patterns or themes. Instead of quantifying and making generalizations, it seeks to explain, understand, and describe (Creswell 2007: 37; Leedy & Ormrod 2013: 139).

This research studies norms as well as their existence and diffusion among states. The emphasis is therefore on states as political actors, as well as the norms that motivate and explain their actions. Studying norms necessitates a qualitative approach. Norms can only be understood by analysing their descriptions and origins. Similarly, to see how norms influence state behaviour requires analysing the motivations states give for their actions. Norm subsidiarity, as a process, further requires an awareness of the larger context behind state motivations. For example, why they promote certain norms as opposed to others. These questions are also linked to state identities, which requires an even greater awareness of context and historical motivations. The emphasis is therefore on uncovering these hidden motivations and explaining them.

The case analysis of this research, which focuses on Iran's support for the norm of peaceful uses of nuclear energy, also necessitates a qualitative approach. It is required to analyse Iran's identity, history, motivations, and its larger context within a Western-dominated world. These areas of focus cannot be quantified and therefore fit better within a qualitative approach.

1.2.2. Research design

The research design employed is a critical literature review. A critical literature review summarises and evaluates literature on a given subject to fulfil the research aims. The arguments and methods of the literature are critically analysed to unveil assumptions, disagreements, and similarities within it (Hart 1998: 13; Grant & Booth 2009: 93).

The three waves of norm diffusion literature differ in their views of the agency of materially weaker states to diffuse norms, to change them, and to challenge or support them. The critical review therefore reveals these differences and argues that the assumptions of the first two waves are inadequate. They do not give adequate agency to weaker states in their explanations and analysis. Instead, they implicitly assume that norm diffusion is the domain of materially powerful states.

The case analysis is concerned with the diplomacy surrounding Iran's nuclear programme. This diplomacy involves high-level deal making between Iran on the one hand, and the P5+1 on the

other. This case is used to analyse the negotiations that have been held, the treaties that have been signed, and the motivations behind these.

This case is relevant as it focuses on the relationship between a materially weak state (Iran) and materially stronger states (the P5+1). Iran also has a history of opposition to dominant powers, and the West in particular. Both Iran's weakness and history fit the criteria of a state that is likely to employ norm subsidiarity. Iran's nuclear programme is also a present international concern, which makes this particular case relevant and illuminating. Nuclear proliferation is especially a sensitive issue. Understanding Iran's motivations is therefore crucial to ensuring appropriate responses to its nuclear programme.

1.2.3. Sampling and text selection

Sampling involves selecting sources on the basis of their relevance to the research question (Emmel 2013: 47; Gentles et al. 2015: 1775). This research adopts a non-random, purposive sampling method. As such, the texts used for this research are selected based on their ability to help answer the research question.

The sources for the critical review are selected based on their position within the three waves of norm diffusion scholarship. This makes them representatives of their respective waves. This in turn allows one to see how the various waves speak to each other and how they differ from each other, especially with regards to the agency of materially weaker states.

These sources are all of a secondary nature (journal articles and books) and written by social constructivist scholars. The most prominent scholars used include Amitav Acharya, Jeffrey Checkel, Martha Finnemore, Thomas Risse, and Kathryn Sikkink. They stretch across the three waves of norm diffusion scholarship. Each of these scholars has either developed unique models for explaining norm diffusion, has contributed to these models, or has helpfully critiqued them. The contributions of these scholars are used to show how the first two waves have an implicit assumption that weaker states have little agency to diffuse their own norms, to contest international norms, or to support existing international norms.

The sources used for the case analysis of Iran's nuclear programme consist of a number of primary sources in the public domain. These include speeches and statements of diplomats and state leaders, International Atomic Energy Agency (IAEA) reports, United Nations Security Council (UNSC) resolutions, and the texts of the treaties signed between Iran and its opponents.

These sources are used to describe Iran's nuclear programme since its inception in 1957, the diplomacy surrounding it, and Iran's motivations behind its actions. Examples of these sources include a September 2007 speech by the Iranian president to the United Nations General Assembly, a 2003 IAEA report on Iran's nuclear programme, and the text of the 2015 Joint Comprehensive Plan of Action.

1.2.4. Data analysis

Analysis involves organizing and examining data to look for patterns and relationships, so as to show the plausibility of a theory or generalization. This research adopts a critical analysis. This type of analysis undermines taken-for-granted assumptions. It critiques the data to understand whether it is convincing, and to show whether and how it is relevant to answering the research question (Neuman 2014: 477, 479; Holland & Novak 2017: 294-296).

The analysis critiques the assumption of the first two waves of diffusion scholarship that materially weaker states have little to no agency to promote international norms to protect their autonomy. It shows how Iran's nuclear programme conforms to the concept of norm subsidiarity. It does so by critically analysing Iran's identity, decisions and motivations in respect of the country's diplomatic decisions.

Iran's identity as a system-dissatisfied state makes it particularly likely that their actions can be described as a case of norm subsidiarity. Its decisions to support certain diplomatic agreements (such as the Joint Comprehensive Plan of Action) or to reject them (as when they rejected the 2015 "Stop, ship, and shut" proposal) are of particular importance. Iran supports diplomatic agreements that respect its right to sovereignty and its right to peaceful uses of nuclear energy. In contrast, Iran rejects agreements that deny it these rights.

Norm subsidiarity explains Iran's decisions. This supports the main argument that materially weak states have ideational agency. Iran successfully supported the international norm, the peaceful use of nuclear energy, to protect its autonomy from more powerful states. Weaker states therefore play an important role in supporting international norms.

1.2.5. Structure of the research

This research is divided into four chapters, including this introduction. The introduction presents the methodology used for this research. It explains the research approach, research design, sampling, and analysis used for the research.

The second chapter provides an overview of the social constructivist theoretical framework adopted for this research, as well as a critical literature review of the three waves of norm diffusion scholarship. The main models and processes of the three waves are discussed. It is shown how the models and processes of the first two waves have an unsound implicit assumption. Both of them assume that only materially powerful states (and their relevant NGOs/IOs) can diffuse norms, change them, and/or abolish them. The second wave merely allows for limited agency for weak states to adapt norms in their own local contexts. The third wave, in contrast, allows for ideational agency for weaker states. More specifically, the concept of norm subsidiarity allows for weaker states to successfully support international norms against the wishes of more powerful states in its analysis.

The third chapter provides an overview of Iran's nuclear programme since its inception in 1957 to the present. The focus is on the various diplomatic agreements Iran has reached with the P5+1, Iran's relationship with the P5+1, and Iran's motivations behind its actions. Iran has a history of subjugation and manipulation by these states, which has influenced its motivations. Iran's nuclear programme was initially supported both by the United States and the other P5+1 countries. However, since 2002 international concerns have been raised about the potential military nature of Iran's nuclear programme. As a result, there have been a number of successful and failed diplomatic agreements reached between Iran and its rivals. The most recent agreement is the Joint Comprehensive Plan of Action, which is in peril at the time of writing.

The fourth chapter is a critical analysis of the diplomacy surrounding Iran's nuclear programme. It is shown how norm subsidiarity explains Iran's decisions and motivations. As norm subsidiarity predicts, Iran has consistently valued its right to sovereignty and its right to nuclear energy for peaceful purposes in the face of overwhelming international pressure. Iran has supported the norms of sovereignty and peaceful uses of nuclear energy whenever the P5+1 themselves violated these norms or tried to exclude Iran from negotiations. In contrast, Iran and the P5+1 have reached agreements whenever the P5+1 has respected Iran's rights to sovereignty and peaceful uses of nuclear energy.

This critical analysis in turn supports the overall argument of this study. Weaker states have significant ideational agency to successfully support international norms to protect their autonomy in spite of overwhelming international pressure.

1.2.6. Ethical considerations

This research is purely my own with the help of my supervisor. All the sources used are either in the public domain or accessible through the university's online library. Only the arguments of various scholars and concepts are critiqued, not any individuals or groups.

2. Literature review: Norm diffusion and agency

2.1. Introduction

This chapter provides a critical literature review of norm diffusion scholarship. The norm diffusion scholarship is critiqued to show the inadequacy of its first two "waves". The first two waves adopt a materialist conception in their analyses of agency that does not allow for materially weaker states to successfully support international norms in opposition to stronger powers.

The conventional social constructivist approach adopted for the research provides the theoretical framework, which is necessary to describe norm diffusion as a process. The norm diffusion literature is usually divided into three distinct "waves". The third wave is of particular importance for this study as it introduces and explains the concept of norm subsidiarity. This concept explains how weaker states resist stronger states by resisting or supporting international norms.

2.2. Constructivism

It is best to begin with an overview of the central assumptions of constructivism by focusing on the agent-structure problem in International Relations Theory (IRT). In terms of constructivism, both agents and structures as equal and mutually constitutive. The emphasis on the mutual constitution of agents and structures is important as this allows for significant ideational agency in international affairs in explanations and analysis.

2.2.1. The agent-structure problem

A structure is "a set of relatively unchangeable constraints on the behavio[u]r of states" (Hopf 1998: 172). Structures limit what states can do. Constructivists argue for the existence of an ideational structure, determined by the international distribution of ideas. In an ideational structure "idea shifts and norm shifts are the main vehicles for system transformation. Norm

shifts are to the ideational theorist what changes in the balances of power are to the realist" (Finnemore & Sikkink 1998: 894). An ideational structure is thus a structure that consists of ideational variables, which include norms.

States are therefore constrained in their actions by prevailing norms. By defining appropriate behaviour, norms limit which behaviours are carried out and why. States tend to act appropriately, or they explain why they act inappropriately. These norms have an influence on agents and their behaviour. However, in social constructivism agents socially construct their own ideational structures (Adler 1997: 324). Agents are influenced by their structure, but not determined by it. At the same time agents also have the ability to influence this ideational structure.

Norms, ideas and other social constructs limit the behaviour of agents. However, at the same time agents have some ability to change these norms and ideas. They can influence the factors that limit and influence their actions. Agents and structures are therefore mutually constituted or co-determined (Wendt 1987: 350). Social constructivism thereby takes the "middle ground" between structuralism and individualism as according to it, neither structures nor agents are dominant over the other (Adler 1997: 331).

2.2.2. Ideas, norms, and identity

An ideational structure implies that state behaviour is shaped by both material and ideational factors. This allows for a focus on ideas and how they change. With this in mind, constructivism focuses on "the role of ideas, norms, knowledge, culture, and argument in politics, stressing in particular the role of collectively held or "intersubjective" ideas and understandings on social life" (Finnemore & Sikkink 2001: 393).

As social facts, ideas can be held collectively. When ideas are held collectively they are called norms. A norm, according to the most widely used definition, is "a standard of appropriate behaviour for actors with a given identity" (Finnemore & Sikkink 1998: 891). Norms and ideas are often used interchangeably, but the key distinction is that ideas can be held individually whereas norms are always shared. It is therefore not possible to reduce norms to an individual level of analysis. This makes it problematic in respect of analysis for individual minded theories, such as neoliberal institutionalism, which emphasises the role of individuals over groups (Adler 1997: 322; Joshi & O'Dell 2017: 345).).

Norms have causal effects despite being socially constructed. Norms are necessary for actors to develop relationships with, and understandings of, each other. They "set boundaries for political life by setting standards of behavio[u]r and defining expectations for what is or should be" (Jinnah & Lindsay 2016: 44). Norms both help to regulate state behaviour by defining what is acceptable behaviour and help to constitute new actors and interests (Finnemore & Sikkink 1998: 894; Hopf 1998: 173; March & Olsen 1998: 952; Chandler 2013: 218; Hellmüller, Federer & Pring 2017: 7).

Regulative norms determine how states behave and constitutive norms constitute a state's identity. Respect for human rights is often seen as a constitutive norm for democratic states. Respect for human rights is often seen as an important criterion for a state to be a democracy. Sovereignty, by insisting that states should not interfere in each other's affairs, is regulative since it restricts how states behave. Norms are therefore necessary for actors to know what they should or should not do. They help actors to understand what is expected of them and what they should expect of others.

Norms cannot be directly observed through the senses. They can only be observed indirectly by studying actors' behaviours. This contrasts constructivism with positivistic approaches – especially realism – which does not allow for the existence of entities that cannot be directly experienced. Norms can be observed when states signal disapproval or praise for another state. They are revealed when states justify their actions (Wendt 1987: 351; Finnemore & Sikkink 1998: 892).

Norms and identity are interlinked. Norms help to constitute identities. Identities, in turn, influence normative behaviour. Identity determines who an actor is, who other actors are, and what interests or preferences actors have. Constructivism states that identities depend on historical, cultural, political and social contexts. As such, according to constructivism, national interests are intersubjective understandings of how to attain power, influence and wealth (Adler 1997: 336; Hop 1998: 176).

2.2.3. Constructivist approaches

Constructivism focuses on the study of norms and identities. It takes the middle ground between structure and agency, and materialism and idealism. It is possible to further divide this theory into different approaches. The distinction is often made between "conventional", "critical", and "postmodern" constructivism.

Conventional constructivists focus on how norms evolve and how identities are constituted. They seek to discover identities, how they are reproduced, and how they constrain actions. Conventional constructivists also emphasise how ideas and norms undermine "traditional" conceptions of state power. The interests of weak groups often prevail over the interests of powerful actors (Hopf 1998: 183; Katzenstein, Keohane & Krasner 1998: 675; Finnemore & Sikkink 2001: 398).

Critical constructivist scholars seek to understand how identities originated, whereas conventional constructivists usually accept identities as they are. Critical scholars also focus on the importance of texts and discourse, and they critique the normative consequences of scholarly work. Critical constructivists argue that constructions of reality only reflect and reify power relations. They see ideas and norms as being dependent on material power and therefore accord powerful states a privileged role in social construction (Hopf 1998: 182-185; Katzenstein, Keohane & Krasner 1998: 676-677; Finnemore & Sikkink 2001: 398).

Postmodernists, in turn, argue that there is no solid foundation for any knowledge. They are concerned with unmasking power relationships in all knowledge claims, including their own. They seek to decentralize established discourses by concentrating on marginal or silent viewpoints (Hopf 1998: 185; Katzenstein, Keohane & Krasner 1998: 677-678).

This study adopts a conventional constructivist approach. This study shows that weak actors, in this case Iran, can show significant agency over materially more powerful states. The identity of Iran as a Shia Islamic, anti-Western state is important to understand Iran's actions. The focus is therefore on the influence of Iran's identity on its actions rather than on how Iran's identity is reproduced.

2.2.4. Modes of social interaction

Before moving on to the discussion on norm diffusion, it is important to give a brief explanation of the different modes of social interaction. Understanding modes of social interaction is important so as to explain why states act the way they do and thus why they promote or accept norms. Each of these modes are "ideal types". One mode rarely, if ever, appears in action by itself. Rather, these modes usually occur in combination with each other. As such, the goal is to see which of them is best at explaining a given situation (March & Olsen 1998: 952; Risse 2000: 3, 18).

One mode of social interaction is the logic of consequentialism, which is also referred to as rational choice. It argues that agents' interests and preferences are mostly fixed. Norms are only useful if they help to explain how a particular action conforms to pre-existing interests (Risse 2000). The logic of appropriateness, in turn, is rule based. Under this logic, actors act out of a sense of what is morally right and in accordance with their norms and identity. Actors are not necessarily driven only by rationality. Risse (2000) sets out a third logic, called the "logic of argumentation". This logic occurs when an actor is uncertain about its interests or the appropriate norm for a given situation. Under this logic, actors engage in discourse and are open to being persuaded (Finnemore & Sikkink 1998: 912; Risse 2000: 6-7, 12; March & Olsen 1998: 950).

2.3. Norm diffusion

Constructivism provides the lens for discussing norm diffusion and the modes of social interaction, which helps to explain the different logics under which states operate. The conventional constructivist approach further allows for ideational agency in terms of analysis. This allows for materially weaker states to have significant amounts of agency.

Norm diffusion is the process whereby norms travel from one political actor to another and between different places and contexts. Jinnah and Lindsay (2016: 45) define norm diffusion most plainly as "the movement and adoption of norms across political borders". It is "the result of adaptive behavio[u]r in which local practices are made consistent with an external idea" (Acharya 2014: 251).

Norm diffusion asks how norms originate, how they travel among states, how they are adopted, how they influence state behaviour, and how they change during this process. The study of norm diffusion gained traction after the Cold War in an attempt to understand why an increasing amount of states were adopting certain international norms, especially those related to the spread of democracy and human rights (Tomsa 2017: 130; Zimmermann 2016: 99).

The constructivist scholarship on norm diffusion can be divided into three distinct "waves". The first wave prioritises how "good" international norms such as human rights are diffused internationally to the national level. This is often done with the help of nongovernmental organizations (NGOs) and international organizations (IOs). The second wave focuses on the agency of states in adopting norms by emphasizing how they adapt foreign norms to suit prior

normative backgrounds. It also emphasises the importance of domestic political structures in preventing or promoting norm diffusion.

The third and most recent wave emphasises norm diffusion from weaker actors to stronger ones. It also focuses on norm contestation, as well as how weaker actors can outright reject foreign norms. Importantly, the third wave also introduces the concept of norm subsidiarity, which is the main focus of this research.

2.3.1. First wave

The first wave is generally focused on the diffusion of "good" and "universal" norms such as human rights and non-racialism. These norms are often promoted by the West, be it Western states or Western NGOs. The most well-known models in this wave are the life-cycle, boomerang and spiral models.

One of the most prominent first wave models is the life cycle model developed by Finnemore and Sikkink (1998). They argue that norm diffusion follows a three-stage process: norm emergence, norm cascade, and internalization. The first stage involves norm entrepreneurs who aim to convince a critical mass of states to accept new norms (Finnemore & Sikkink 1998: 895; Finnemore & Sikkink 2001: 400).

Norm entrepreneurs are private individuals, the media, NGOs, IOs, government leaders, mediators, states or regional organizations. They call attention to issues or create them by dramatizing and reinterpreting them. Their primary motivation is the values which they seek to promote rather than material concerns (Finnemore & Sikkink 1998: 896; Keck & Sikkink 1999: 89; Davies & True 2017; Joshi & O'Dell 2017; Hellmüller, Federer & Pring 2017).

The second stage of the life cycle model is set in motion when a critical number of states have adopted the norm. At this point the norm reaches a tipping point after which it is rapidly accepted by other states. The international influence becomes more important than domestic politics. States start to adopt the norm due to pressure for conformity (to feel that they "belong" in the social environment) and to increase their esteem in the eyes of themselves and other states. The third stage, internalization, sees the norms being so widely accepted that they become "taken-for-granted". They are no longer debated domestically (Finnemore & Sikkink 1998:901-904).

Keck and Sikkink (1999) contribute to this wave by developing the “boomerang” model. They focus on transnational advocacy networks. These are transnational non-state activists committed to defending a certain cause. When governments violate a certain norm, individuals and domestic groups are often incapable of working within the country to stop the violation. As a result they turn to international actors. It is here that transnational advocacy networks link with domestic groups to put pressure on the state from outside. International actors thereby amplify the demands of the domestic group (Keck & Sikkink 1999: 93).

This is the “boomerang” effect. Lacking material power, these transnational networks persuade governments to address violations by holding them accountable to their commitments, leveraging powerful actors against them, and providing better solutions (Keck & Sikkink 1999: 94-98).

The first wave of norm diffusion scholarship reached its peak with the introduction of the “spiral model” (Risse, Ropp & Sikkink 1999). Building on the life-cycle and boomerang models, this model sets out five stages for the diffusion of human rights norms in particular.

The first stage is repression. A state represses a population with a weak opposition. At this point the international community has little information on human rights abuses in the country. Eventually, transnational activists spread awareness of the abuses, putting the human rights violating state onto the international agenda. The third stage sees the state denying the norm itself and rejecting international criticism. With continued criticism the government gives certain tactical concessions in favour of the norm. This creates space for the domestic opposition and transnational activists to support each other’s norm promotion efforts against the government.

Eventually, in the fourth stage, the state’s mere engagement with the norm gives the norm a prescriptive status as the state finds it difficult to continue denying the norm while giving tactical concessions in favour of it. The fifth and last stage then sees the state adopting rule-consistent behaviour with the norm as it becomes taken-for-granted. The state no longer opposes it and it no longer merely accepts it for instrumental reasons. Rather, the state has internalized it to the extent that it now follows the norm through a logic of appropriateness rather than consequentialism. The state considers it “the right thing to do” (Risse, Ropp & Sikkink 1999).

2.3.2. Second wave

The first wave of norm diffusion literature has been criticised on multiple grounds. One of these is that it focuses on international actors over domestic actors: little or no agency is granted to states adopting foreign norms. The life-cycle and spiral models both imply that norm receiving actors will eventually adopt these norms and that this is mostly due to international pressure working together with domestic actors. This leads to the question as to why certain norms have a greater impact in some countries than others and why some norms fail to diffuse at all (Checkel 1998: 332; Hirata 2004; Acharya 2004: 242; Zwingel 2012: 118; Steinhilper 2015: 538).

Another criticism is the focus on norms considered inherently "good" and "universal", such as human rights, the environment, and ending racial segregation. How norms change over time is also not often addressed. Instead, this wave focuses on international norms displacing national norms instead of focusing on contestation between them. It also views norms as unchangeable after diffusion (Checkel 1998: 339; Acharya 2004: 243; Contessi 2010; Acharya 2013: 470; Zimmerman, Deitelhoff & Lesch 2017: 693).

The second wave of norm diffusion literature has tried to address these shortcomings by focusing on the agency and cultural backgrounds of norm-takers. It also focuses on how the different domestic systems of states can prevent or enhance norm adoption. The prominent models in this wave include cultural match, norm localization and vernacularization.

Checkel (1998; 1999) attempts to address first wave criticisms through his research on domestic variables on the one hand, and his concept of a "cultural match" on the other. With regards to the former he sets out the process of norm diffusion through elite learning (Checkel 1997). By focusing on the domestic structure of states in determining how norms diffuse, Checkel moves away from the more international focus of first wave scholarship. His idea is that norms diffuse through two mechanisms: rational choice, where elites recalculate strategies due to domestic pressure to adopt a norm; and elite learning, where agents are taught new values and interests. The latter is done through a logic of appropriateness (Checkel 1997: 477).

He goes on to use the domestic structure of the state as the intervening variable to predict which mechanism will prevail. Liberal states, being open to domestic pressure, will adopt norms out of rational considerations. Corporatist states have a mixture of both mechanisms. Statist governments are dominated by elite learning with some pressure from below. Lastly, state-above-society governments are wholly influenced by elite learning (Checkel 1997: 478).

Checkel's second contribution, cultural match, draws on the work of sociologists. He defines it as "a situation where the prescriptions embodied in an international norm are convergent with domestic norms" (Checkel 1999: 87). Cultural match occurs when a foreign norm is compatible with the domestic culture. According to Checkel this operates on a spectrum. It could be positive, in which case the international and domestic norms are compatible; it could be in the middle, in which case there are no barriers to diffusion; or it could be negative, in which case there is no congruence between the international and domestic norms (Checkel 1999: 87; Hirata 2004).

In summary, elite learning presents a top-down (state to society) diffusion model, in contrast to first wave scholarship emphasizing bottom-up (society to state) pressures. Furthermore, the structure of the domestic states, as well as their prior normative backgrounds, places the focus on domestic factors rather than on only international ones in determining successful diffusion.

Acharya (2004) builds on Checkel's cultural match in introducing his concept of norm localization. He defines norm localization as "the active construction (through discourse, framing, grafting, and cultural selection) of foreign ideas by local actors, which results in the former developing significant congruence with local beliefs and practices" (Acharya 2004: 245). In essence, localization examines how domestic actors change foreign norms to fit local beliefs. The difference with cultural match is that cultural match is a passive process of norm movement from the international to the national level, whereas localization is concerned with a state actively making a foreign norm fit the local culture. The local actors might seek to localize foreign norms when international events make them unsure about how to behave, to legitimize their authority, or as a result of international and regional pressure (Acharya 2004: 246-247).

In the process of localization local norms are not necessarily displaced. Displacement only occurs when the local norm is already questioned from within. If, however, the norm recipient merely wants to address inadequacies in local beliefs, it will strengthen them by adapting foreign norms. Localization is thus most likely when the foreign norm can enhance the legitimacy of existing practices without altering the local identity; when the prior local norms are strong; and local actors are strong enough to outperform foreign norm entrepreneurs acting at the global level (Acharya 2004: 248).

Norm localization therefore helps to shift the focus to the actors receiving foreign norms. It is no longer a case of an international norm being completely adopted to the detriment of existing

norms. Rather, local actors are actively involved in changing foreign norms to suit their interests.

Zimmermann (2016) builds on Acharya's localization concept. Agreeing with Acharya and other authors in this wave, she critiques the tendency of diffusion scholarship in this wave to see diffusion as a case of full scale norm acceptance, rejection or decoupling. Decoupling occurs when a government rhetorically and legally accepts a norm, but does not implement it. Localization itself, according to her, also does not say enough on the precise categorization of localization, the process of localization and the different types of localization (Zimmermann 2016: 104).

She proposes a new approach whereby norms are localized in three different dimensions or steps: the domestic discourse, law, and implementation (Zimmermann 2016: 106). In each step the international norm is accepted, localized, or rejected. For instance, a norm can be adopted into law and implemented (step two and three), but still be contested in public discourse. Alternatively, a norm could be localized by the domestic audience, but not be recognised by law or implemented. Zimmermann thus goes beyond a focus on only foreign norm promoters or local norm adopters. Norms are not only either rejected, accepted or decoupled. Instead, diffusion is a spectrum between full internalization and complete rejection. Rhetorical adoption, legal adoption, and implementation exist within this spectrum (Zimmermann 2016: 93-111).

Levitt and Merry (2009) develop the concept of vernacularization. Vernacularizers are actors (such as NGOs) in between the transnational norms and the local people. They take the ideas of one group and frame them ("vernacularize" them) in terms that another group will accept. Transnational norms are presented in a way that will resonate with local beliefs and yet stay sufficiently different to challenge those beliefs (Levitt & Merry 2009: 447).

Vernacularization, as with norm localization and cultural match, takes existing local identities and norms as key factors in determining whether it is possible to translate an international norm in a way that will appeal to the recipients. However, the focus is similar to first wave scholarship in emphasizing transnational actors. The vernacularizers, not the adopting state (as with norm localization) are framing the norms to fit local beliefs (Levitt & Merry 2009).

2.3.3. Third wave

The third wave of norm diffusion literature is relatively recent. It is concerned with addressing inherent biases within the two prior waves. This wave challenges the linear international-to-domestic and West-to-non-West diffusion assumptions within the other two waves of scholarship. The prior waves focus on norm diffusion from the international level to the national level, while ignoring norm diffusion from weaker states to stronger ones. These include many of the previous concepts, such as cultural match and localization, which often assume that norms will originate internationally and that states can merely accept and/or change them (Zwingel 2012: 118; Steinhilper 2015: 538; Joshi & O'Dell 2017: 358; Zimmerman, Deitelhoff & Lesch 2017: 692; Webb 2018: 406).

Steinhilper (2015: 538) criticises Acharya's concept of norm localization for still being concerned with explaining how norms are adopted from the West: diffusion from the Global South to Western receivers are not explicitly foreseen in localization. Vernacularization and localization only provide for norm change at the local level, rather than a complete change of the international norm itself. As Zimmerman, Deitelhoff and Lesch (2017: 695) put it, "norms are translated by actors in new local contexts, yet the 'original' international norm remains intact, and space for change only exists 'at the margins'. Through this, the translation perspective remains surprisingly top-down in its orientation". It is assumed that states can change international norms only in their own domestic contexts. They are unable to alter the international norm itself. The third wave questions this assumption.

With all of the above critiques of prior waves in mind, the third wave promotes different approaches to studying norm diffusion. These include analysing how norm contestation can change international norms; how norms diffuse from materially weaker states to stronger ones; and how materially weaker states resists strong states by supporting international norms.

2.3.3.1. Diffusion from the weak to the strong

One major area of third wave scholarship is the diffusion of norms from materially weaker actors to stronger ones. Steinhilper (2015) shows how non-Western actors can successfully diffuse norms to the West. Powerful actors such as the United States have been at the receiving end of powerful campaigns to force the United States to adopt international norms that originated from far weaker actors.

Bettiza and Dionigi (2015) similarly show how norms from weaker actors diffuse through the process of institutional translation. They argued that for "thick" cultural norms to diffuse they need to be "thinned" by translating them into terms applicable to other cultures without changing those cultures. For a norm of one state to diffuse, the norm needs to be presented in such terms that the target state can agree with it. This is reminiscent of Levitt and Merry's (2009) "vernacularization". However, institutional translation places its emphasis on a state promoting its own norm internationally rather than transnational actors – vernacularizers - mediating between international norms and norm-adopting states.

Och (2018), similarly to Zimmerman (2016), provides more clarity on the domestic aspects of norm localization. She argues for an inward-looking and bottom-up approach to norm diffusion when a state is unwilling to adopt a norm and is immune to international pressure. She incorporates aspects of both the second wave (with the focus on norm localization) and the third wave (prioritizing diffusion to powerful, Western states). She calls this diffusion process a "reversed boomerang pattern". In this situation transnational activists reach out to local activists to change domestic structures to create upwards pressure from within. Norm diffusion, and localization in particular, therefore do not necessarily have to take place at the national level, but can include the local, city or municipal levels. Och is therefore unique because she recognizes that although materially strong states might resist norms at the national level, they may be susceptible to diffusion at the local level.

2.3.3.2. Norm subsidiarity

A unique and understudied aspect of third wave diffusion scholarship is analysis of the ability of materially weaker states to resist norms of stronger ones, or to use international norms against stronger states. Acharya (2011) develops the concept of norm subsidiarity to detail this process. Norm subsidiarity is a process whereby "local actors create rules with a view to preserve their autonomy from dominance, neglect, violation, or abuse by more powerful central actors" (Acharya 2011: 97). This process sees actors either rejecting foreign norms in favour of their own, or amplifying international norms to constrain the behaviour of powerful states violating them. For the latter, Acharya especially notes norms around sovereignty, territorial integrity, non-intervention, self-determination and the equality of states.

Subsidiarity is specifically tailored to understanding the behaviour of weaker states. This is because their autonomy is more likely to be violated. Hypocrisy, exclusion and perceptions of

dominance and neglect are the triggers for norm subsidiarity. Weaker states develop subsidiarity norms to either challenge their exclusion from global norm-making processes, or to confront Western hypocrisy when the latter violate global norms. Norm subsidiarity can be seen by the extent to which a state resists and undermines the actions of strong powers that weaker ones see as illegitimate (Acharya 2011: 98-100).

Norm subsidiarity is particularly relevant for states that are frustrated with the international, Western dominated system. As Acharya (2011: 101) puts it, "system-dissatisfied weak states/powers tend to be more prone to norm subsidiarity than system-satisfied weak states/powers. While Western weak countries or middle powers may develop norms of their own, these norms are not motivated by an acute sense of marginalization or a security predicament where internal security concerns trump external ones" (Acharya 2011: 101).

Lee and McGahan's (2015) research on anti-piracy efforts in the Malacca straits build on the concept of norm subsidiarity. However, they add that cognitive priors can also trigger norm subsidiarity. Cognitive priors are strongly held norms such as sovereignty and self-determination, but depend on the state in question. Norm subsidiarity is triggered whenever a state's cognitive priors are violated.

2.3.3.3. Contestation

A third area of focus in third wave scholarship is how the original meaning of international norms can change. Prior waves assume that an accepted norm is clear and undebatable and that it will not change. They ignore how states debate (contest) the meaning of various international norms and how these discussions can alter them.

Here Van Kersbergen and Verbeek (2007) argue that norms, even after they are accepted, are frequently reinterpreted and redefined. A norm, once accepted, changes preferences and identities, and alters power-relations between actors. These actors then launch an effort to redefine the norm that led to these changes.

Zimmerman, Deitelhoff and Lesch (2017) argue that contestation can lead to a change in the international norm. According to these scholars, there are two types of contestation: validity contestation and application contestation. Validity contestation occurs when the norm itself is questioned. If those who contest it succeed, then the norm is completely abolished. However, this type of contestation can also be positive. Questioning a norm's validity could lead to states

coming out in support of the norm. Application contestation questions whether the application of a norm for a given situation is appropriate. Debates on a norm's application change it incrementally and strengthen it as the contending states clarify which behaviour conforms or violates the norm (Zimmerman, Deitelhoff & Lesch 2017: 700).

Zimmerman, Deitelhoff and Lesch's contribution shows the impact which contestation has on changing international norms themselves (rather than mere changes at the local level). Weak agents on the periphery have agency to provoke debates and withdraw from norms that they formerly accepted. It is not the case that they have no say over what norms they should accept or that they have no opportunity to engage in discussions to change or abolish international norms.

Badescu and Weiss (2010) also focus on the impact that contestation can have on norm change. They agree that contestation can help to clarify the norm. However, they make a unique contribution by arguing that failed cases of implementing a norm, or even misuses, can in fact strengthen rather than weaken it. A wrongful application of a norm does not necessarily weaken it. Rather, states learn from this experience in order to refine the norm and make it more specific. This provides more clarity to the norm and thereby makes it easier to apply.

With the previous articles on norm contestation in mind, Panke and Petersohn (2016) set out mechanisms for when contestation changes a norm and when it abolishes a norm. Research on norm abolition (what they call norm "death") is often ignored (Panke & Petersohn 2016: 1). They argue that whether norms are changed or abolished depends on three factors: whether the norm is embedded in international institutions; whether the norm is vague or specific; and whether the contesting states are powerful. Embedded norms are usually contested through negotiation. Those that are not embedded are contested through non-compliance. If the norm is specific, and the contesting nations succeed, the norm is entirely abolished. If, however, the norm is vague, it will be reinterpreted (Panke & Petersohn 2016).

Importantly, Panke and Petersohn disagree with Acharya's (2011) concept of norm subsidiarity. Norm subsidiarity explicitly argues that weaker actors can successfully support an international norm when stronger actors are contesting it by violating it. When stronger actors do not comply with a norm, in Acharya's view, the norm is not necessarily changed or abolished. Panke and Petersohn argue for a more materialistic view of power. They argue that the material power of states determine whether norms are changed or abolished. Norm

subsidiarity argues the opposite. Weaker actors have ideational agency to support an international norm despite the wishes of more powerful actors.

Acharya (2013) presents an alternative framework of norm creation and diffusion, which he calls “norm circulation”. In this framework a norm, once accepted globally, is localized and contested. In the process of norm subsidiarity states present alternative versions of an international norm to combat abuses of the norm by strong powers. These norms are then repatriated back into the international context, hence the norm being “circulated”.

2.4. Agency of the weak

The three waves of norm diffusion scholarship have built on each other in terms of which actors have agency in norm diffusion. They differ in their areas of focus, assumptions, and problems. However, they all fall within the broad constructivist framework. The central importance of the models of each wave have to do with norms and how they diffuse. Norms are important and they play just as important a role as material capabilities and other types of power. These norms are promoted by norm entrepreneurs, diffuse to the international realm, and are adapted, contested, rejected, or amplified.

The first wave has a predominantly international-centric view of norm diffusion. It prioritises powerful, often Western, states and their role in promoting and diffusing norms internationally. States are pressured by a combination of domestic actors and NGOs/IOs to accept the norms of these powerful states. These norm-accepting states have little agency in deciding whether they want to accept a certain international norm. These states also have no ability to significantly adapt these norms to suit their own purposes.

The life-cycle model presents the simplest version of this process. A few powerful states promote a norm over a number of years. Eventually when enough states have accepted this norm, it diffuses globally over a short period of time. The boomerang model provides more nuance by showing the connection between the internal norm-entrepreneurs and external, international, norm-entrepreneurs. The spiral model incorporates both these models, but adds more stages to the process whereby a state accepts a norm.

The first wave has two main theoretical problems. The first is a lack of focus on the agency of states who accept foreign norms. No attention is giving to how and why some states reject international norms or adapt them. The second problem is an implicit assumption that only

materially powerful states matter in norm diffusion and that weaker states have no choice but to eventually accept the norms of these powerful states. The first wave focuses on powerful, Western, countries who put pressure on weaker ones who, eventually, have no choice but to accept the norms of their more powerful counterparts.

The second wave of norm diffusion scholarship addresses the first problem of the first wave, but not the second problem. The second wave shifts the focus to the domestic states who accept international norms. Here cultural match shows how the pre-existing culture in a state could lead to a lack of diffusion of international norms to this state. Agency is also given to states that accept norms. Checkel's concept of elite learning and Acharya's norm localization both allow for the possibility that states may seek out foreign norms for their own reasons. Checkel argues that states can adopt norms through elite learning. States do not have to be forced to accept international norms, but might accept them out of their own free will. Similarly, Acharya's concept of norm localization allows states to actively seek out foreign norms and to adapt them to suit their own pre-existing beliefs.

As with the first wave, the second wave does not challenge the assumption that powerful, Western, states are the main norm entrepreneurs. The second wave merely gives more agency to weaker states to choose among existing international norms. Weaker states can only change these international norms in their own local contexts. No allowance is made for weaker states to play an active role in global norm diffusion.

The third wave builds on the previous two by focusing on the global agency of weaker states. Weaker states can and do diffuse their norms internationally where they are accepted by powerful states. Weaker states also play an active role in changing existing international norms by contesting them.

However, by focusing on the roles and norms of weaker states, the third wave does not adequately allow for weaker states to play a meaningful role in supporting existing international norms. Instead, the focus is on contestation and diffusing norms from weaker states to powerful ones. Acharya's concept of norm subsidiarity addresses this problem. This concept allows for weaker states to challenge international norms or to support them. The second, supportive, element is understudied. It is simply assumed that weaker states, because of their material inferiority, do not play a meaningful role in supporting international norms in the face of their violation by stronger states. Instead, as Panke and Petersohn argue, it is assumed that strong states can abolish international norms even when weaker states support them.

2.5. Conclusion

The norm diffusion literature has a recent, but rich history. Starting out as an attempt to show that norms matter, the first wave showed that international norms promoted by Western actors diffuse along certain pathways, be it the life-cycle, boomerang or spiral models. The focus is usually on NGOs and international organizations. However, these models are criticised for their focus on "good" and "universal" norms, for prioritizing Western actors and transnational organizations, and for ignoring domestic agency. The second wave turns the focus around by prioritizing local variables: the domestic culture and political systems of norm-adopting states and the agency of states in changing foreign norms.

The first two waves do not take account of the agency of weaker states to outright reject foreign norms, and neither do they account for how norms change. As such, third wave scholarship provides models for how international norms change through contestation; how norms can in fact diffuse from weaker to stronger actors; and how weaker states can reject foreign norms or amplify them to restrain powerful actors. Norm subsidiarity especially shows the positive role that weaker states can play in supporting international norms.

3. The case of Iran's nuclear programme

3.1. Introduction

This chapter details the history and context surrounding the diplomatic debates and treaties on Iran's nuclear programme. It provides an overview of various agreements reached on Iran's nuclear programme. It focuses on the motivations Iran provides for agreeing or not agreeing to certain agreements. This will help to explain how Iran's actions fit the description of norm subsidiarity in the analysis.

Iran's diplomatic decisions and motivations for them are a clear example of norm subsidiarity in action. Iran's diplomatic decisions since 2002 have been influenced by perceptions of hypocrisy and exclusion demonstrated by its opponents.

The chapter begins with an overview of Iran itself: its geostrategic position, its power relative to other states, and its history of subjugation by Western countries. Linked to this is the more specific relationship between Iran and the United States. This helps to provide greater context in respect of Iran's decisions on its nuclear programme. This is followed by a short discussion on the non-proliferation treaty. This is necessary so as to understand the reasoning behind Iran and Western countries' positions on the former's nuclear programme.

The next section details Iran's nuclear programme since its inception in 1957. This part is divided into six sub-sections. The first discusses Iran's programme up until the Iranian Revolution in 1979, which saw a comprehensive breakdown in relations between Iran and the United States. The next sub-section discusses Iran's programme up until 2002, when the International Atomic Energy Agency (IAEA) made the programme an international concern. This event was followed by the first multilateral diplomatic attempts at a solution. The states involved are Iran, the EU-3 (Britain, France and Germany), and later the P5+1 (Britain, France, Russia, China, the United States, plus Germany). These discussions broke down when the IAEA referred Iran to the UNSC, who in turn imposed sanctions on Iran. The fifth sub-section discusses the 2015 Joint Comprehensive Plan of Action (JCPOA) in-depth. The final sub-

section details why the JCPOA is in jeopardy and where Iran's programme stands at the time of writing.

3.2. Iran: Context and history

It is necessary to provide a brief overview of Iran's recent history before outlining the recent diplomatic relationships between Iran and the West. This history sets up Iran's identity as a Shia Islamic, and deeply anti-Western state. This identity in turn provides more context to Iran's relationship with other states.

Iran is an oil rich nation, has a diverse economy and a developed industry, and its population is highly educated. It is therefore one of the most advanced economies in the region. Despite this, compared to other regional and international actors, Iran is relatively weak in material terms. Its GDP (at $454 billion) is higher than Israel ($367 billion) and Egypt ($250 billion), but lower than Turkey ($766.5 billion) and Saudi-Arabia ($782 billion). By GDP per capita Iran (at $5 628) is significantly lower than the latter two ($9 311 and $23 219), and Israel ($41 614). Iran's GDP pales in comparison to the United States (at about $20 trillion) and the European Union ($19 trillion). Iran's defence budget in 2018 stood at $13 billion compared to Saudi-Arabia at $68 billion, Turkey at $19 billion and America at $650 billion. Iran may be strong relative to some regional states such as Iraq, Yemen and Qatar, but it is relatively weak compared to regional and international rivals (World Bank 2019a; World Bank 2019b; World Bank 2019c).

Iran has historically been dominated by foreign powers. In 1907 Russia and Britain divided Iran into spheres of influence, removing any chance of Iranian independence at the time. In 1941, during the Second World War, the Soviet Union and Britain invaded Iran. They were concerned about Iran's relationship with Germany and they wanted to ensure safe supplies to the Allies. The US, who was neutral at the time, supported Iran's territorial integrity. In 1941 the United States helped Shah Muhammad Reza Pahlavi to oust his father as the leader of Iran. In 1953 the US also helped him to remove the democratically elected prime minister, Mohammed Mossadegh. Iran eventually became the strongest US ally in the Middle East (Simbar 2006: 75; Hussain 2015: 30-31).

The previous instability strengthened the Islamic leader, Ayatollah Khomeini. After two decades, in 1979, he gathered enough support to oust the Shah in what became known as the

Iranian Revolution. Pahlavi was responsible for the death of many Iranians during the revolution. Iran became hostile to Western countries, because they had supported the Shah (Simbar 2006: 77; Karacasulu & Karakir 2008: 6; Hussain 2015: 31).

After the Revolution, Iran settled for the principle of non-alignment. It abandoned the Western backed Central Treaty Organization (CENTO) and joined the Non-Aligned Movement (NAM). The Iranian leaders believed that a Western alliance would not fit with Iran's religious, cultural and historical context. Iran opted for non-alignment because it thought dependency, known during the Shah's rule, was both anti-Islamic and anti-Iranian (Simbar 2006: 75-76; Hussain 2015: 31).

3.3. Context of the West and Iran

There are other political concerns that impact Iran's nuclear programme. Iran's nuclear programme should therefore not be viewed in isolation from these other issue areas. These problems are mainly related to Iran's relationship with the United States specifically, and the West in general.

The United States is concerned about Iran's human rights abuses, its perceived backing of terrorist groups, and Iranian interference in regional affairs. They have instituted a wide range of sanctions because of this. The United States instituted an oil embargo against Iran in November 1979 as a result of the hostage crisis that year. America subsequently supported Iraq's invasion of Iran in 1980 through diplomatic, military and economic means. In 1987, Iranian imports were banned. This was followed by America banning investment in Iran's energy sector in 1995 and eliminating all trade and investment between the two states in 2000 (Simbar 2006: 77-78; Vaez 2013: 8; Hussain 2015: 31).

The United States wants Iran to stop supporting Hezbollah and Hamas, to co-operate with the Israeli-Palestinian peace process, and to suspend what it believes is Iran's WMD programme as preconditions for lifting sanctions. Similarly, Iran believes that America wants to overthrow Iran's government. Iran wants America to stop what it sees as propaganda used against Iran. Iran also wants the United States to stop supporting what Iran believes are terrorist groups (Simbar 2006: 78; Vaez 2013: 11).

3.4. Short overview of the NPT

As the following case is concerned with Iran's nuclear programme, it is necessary to give a brief overview of the Treaty on the Non-Proliferation of Nuclear Weapons (NPT). This helps one to understand Iran's motivations in respect of its nuclear programme.

The NPT is one of the most important international arms-control treaties in history. It was opened for signatures on 1 July 1968 and came into force on 5 March 1970 (UN 2019a). Its main goal is to prevent the proliferation of nuclear weapons and their technology, to increase cooperation of peaceful uses of nuclear energy, and to further efforts towards nuclear disarmament. The International Atomic Energy Agency is tasked with overseeing the implementation and verification of the NPT through the IAEA's safeguards system. Under Article III, all non-nuclear weapon states are required to accept safeguards negotiated with the IAEA (UN 2019b).

191 states have signed the treaty (UN 2019a). Those who have not done so include Israel, India, Pakistan and South Sudan. North Korea withdrew from the NPT in 2003. India, Pakistan and North Korea are known to possess nuclear weapons. Israel has also been accused of having nuclear weapons, although the Israeli government denies this.

Of particular relevance to the following case is Article IV of the treaty. It deals with the peaceful uses of nuclear energy. It states that signatories to the treaty have the "inalienable right" to "research, production and use of nuclear energy for peaceful purposes without discrimination" (UN 2019b). It also provides an obligation on signatories to "co-operate in contributing alone or together with other States or international organizations to the further development of the applications of nuclear energy for peaceful purposes" (UN 2019b). In short, Article IV allows signatories to develop nuclear energy for peaceful purposes and it obligates states to help each other to do so.

The NPT serves as a normative framework behind Iran's actions. The provision in Article IV that guarantees peaceful uses of nuclear energy serves as a broad regulatory norm that Iran holds to. The same applies to cooperation on nuclear energy. Iran, as a signatory to the treaty, therefore holds to the NPT as a normative framework in general, but more specifically the norm of peaceful uses of nuclear energy and the norm of cooperation on nuclear energy.

3.5. Iran's nuclear programme

3.5.1. Iran's nuclear programme prior to the Iranian Revolution: 1957-1978

Iran's relationship with nuclear energy stretches back to 1957. In this year, the United States offered to help Iran's nuclear programme as part of the former's "Atom for Peace" initiative. Under this programme the US provided Iran with low-enriched uranium for research and development towards peaceful uses of atomic energy. In 1967 American companies supplied Iran's first nuclear facility at Tehran University and provided it with highly enriched uranium (HEU) to fuel the Tehran Research Reactor (Simbar 2006: 80; Karacasulu & Karakir 2008: 1; Vaez & Sadjadpour 2013; Abtahi 2014: 732).

Uranium is considered "highly enriched" if it is enriched beyond 20%. Enriched uranium is more useful for nuclear weapons. Enriched uranium is used either for nuclear reactor fuel or as fissile material for nuclear weapons, which makes it difficult to ascertain what a state is using it for (Karacasulu & Karakir 2008: 1; Ferguson 2011: 8).

Iran was one of the original signatories of the NPT on 1 July 1968 (ratified in 1970). This was followed by the establishment of Iran's Atomic Energy Organization in 1974. At the time, the Iranian leader, Shah Mohammad Reza Pahlavi, made nuclear energy a national priority. He wanted to preserve oil by diversifying Iran's energy needs, while also signifying Iran's prestige as a modern country. Iran believed that its oil reserves would not keep up with growing energy demands. Four years later, in 1974, Iran agreed to the IAEA's safeguards agreement, as required by the NPT (UN 2019c; Vaez & Sadjadpour 2013; Hussain 2015: 34).

European countries also participated in Iran's nuclear programme. France constructed two heavy water reactors in 1974 and West Germany constructed two nuclear facilities in Bushehr in 1976. Iran also purchased a 10% share in Eurodif, a joint European uranium enrichment company, which entitled Iran to 10% of the company's HEU. Multiple international deals were established. Contracts were signed with universities and technical centres worldwide to increase Iran's nuclear expertise. By 1979 the Atomic Energy Organization had the second-highest budget in the country and its employees were the highest paid in Iran (Abtahi 2014: 732; Karacasulu & Karakir 2008: 4; Vaez & Sadjadpour 2013; Hussain 2015: 34)

The Shah's desire for a complete nuclear fuel cycle and plutonium reprocessing facility led to American speculations that Iran planned to build nuclear weapons (Vaez & Sadjadpour 2013). A 2013 interview with Akbar Etemad, the head of Iran's nuclear programme between 1974 and

1978, confirmed this (Malik 2013). According to him, the Shah did not want to build nuclear weapons, but he nonetheless wanted to keep the option open.

America sought assurances of the peaceful nature of the programme, including additional safeguards and access to sensitive technology. Iran and the United States failed to reach an agreement. The US subsequently stopped American companies from selling nuclear technology to Iran. As a result, international actors filled the gap. These included France, West Germany, and South Africa. In 1978 Iran and America came to an agreement. Iran promised to terminate plans for its plutonium processing plant, to send nuclear fuel to America, and to allow increased monitoring. In exchange American companies agreed to sell reactors to Iran (Vaez & Sadjadpour 2013). The Iranian Revolution scuttled these plans.

3.5.2. After the Revolution: 1979-2001

After the Revolution the supreme leader, Ayatollah Khamenei, temporarily halted nuclear energy development as he considered it to be anti-Islamic. However, in 1984, with energy shortages and war with Iraq, Iran decided to continue developing nuclear energy and asked international actors to help. As a result, Iran looked to China and the Soviet Union. Iran also signed nuclear cooperation agreements with Pakistan and Argentina in 1987. Argentina, Russia and China agreed to help to reconfigure the Tehran Research Reactor, complete the pressurised water reactors in Bushehr, and to provide Iran with HEU (Karacasulu & Karakir 2008: , 4; Abtahi 2014: 732).

In the 1990s America imposed sanctions on Iran to limit its nuclear programme. President Clinton banned American companies from investing in Iran's oil industry. In 1996 he also imposed sanctions against foreign firms investing in Iran's energy industry. In contrast, until 2002, European states hesitated to join America's crusade against Iran. In the meantime Iran sought out other allies, but often without success. In the 1990s China's assistance to Iran ended as a result of American protests, leaving Russia as Iran's chief supplier (Karacasulu & Karakir 2008: 4-5).

3.5.3. International concerns and negotiations: 2002 to 2004

On 4 August 2002, an Iranian opposition figure in exile, Alireza Jafarzadeh, revealed that Iran had hidden two nuclear facilities for almost two decades: the uranium enrichment complex at

Natanz and a heavy water facility at Arak. The next year, Iranian President Khatami confirmed the existence of nuclear facilities at Natanz which were able to produce HEU. This revelation raised concerns about the nuclear programme to an international level. Even supporters of Iran, such as Russia, were shocked by Iran's clandestine nuclear activities (Karacasulu & Karakir 2008: 1, 4, 9; Abtahi 2014: 733; Hussain 2015: 35).

It was from then on that the IAEA became more involved to ascertain whether Iran's enrichment was sufficient for building nuclear weapons. After months of negotiations the IAEA was granted access to Natanz in February 2003. The IAEA found evidence of enriched uranium at the facility, and proof that Iran secretly imported 100kg of uranium. According to the IAEA report, they found that Iran failed to declare that they had imported uranium in 1991 and that Iran had undeclared facilities where uranium was stored and processed (IAEA 2003a: 7).

This violated the IAEA and Iran's Safeguards Agreement. This agreement, mandatory under the NPT, required Iran to provide the IAEA with information on nuclear materials that are produced or that can be enriched. The IAEA also called on Iran to adopt the Additional Protocol. The Protocol is part of the Safeguards Agreement, but it is voluntary. It allows for more intrusive IAEA inspections, including visits to undeclared facilities (IAEA 2003a: 3; Kerr 2003: 24; Ferguson 2011: 9).

On 9 February 2003, Iran agreed to the modified Code 3.1. This is another voluntary protocol under the Safeguards Agreement. It requires states to submit design information for new facilities to the IAEA as soon as a state authorized their construction (Ferguson 2011: 10; Arms Control Association 2018).

On 21 October 2003, Iran reached a deal with the foreign ministers of the EU-3 countries. Iran agreed to voluntarily suspend uranium enrichment for the time being and to sign the IAEA's Additional Protocol. Iran reiterated that its nuclear programme was peaceful. This agreement came after the IAEA adopted a resolution in September calling on Iran to suspend enrichment. Iranian Ambassador Salehi and the Director General of the IAEA signed the Additional Protocol in December of that same year (IAEA 2003b; Kerr 2003: 24-25).

Iran had some reservations with this deal. Iran reiterated that it had the right to enrich uranium, as stated in the NPT. Iran was also concerned that the Additional Protocol gave increased inspection power to the IAEA that would threaten Iran's sovereignty. Iran wanted to be reassured that it would gain access to peaceful nuclear technology. It is noteworthy that the

EU-3 reassured Iran of the latter's rights in the declaration. The EU-3 recognised Iran's right to peaceful uses of nuclear energy and stated that the Additional Protocol did not intend to undermine Iran's sovereignty. The EU-3 also promised easier access to Iran to modern technology once concerns of the latter's nuclear programme were addressed (Kerr 2003: 25).

In June 2004, the IAEA claimed that Iran had failed to cooperate with the agency (Davenport 2019). Iran responded by refusing to stop enrichment as it promised the year before. However, shortly afterwards, in November 2004, Iran signed the Paris Agreement. Under the agreement Iran agreed to voluntarily suspend nuclear enrichment and to cooperate with the IAEA. The EU-3, in turn, recognised Iran's rights under the NPT (IAEA 2004; Kerr 2005: 29; Karacasulu & Karakir 2008: 4-8).

3.5.4. Obstacles and sanctions: 2005-2012

In August 2005, Mahmoud Ahmadinejad was elected as Iran's president. He had a more confrontational approach to Iran's opponents. Ahmadinejad reiterated that Iran had the right to enrich uranium. Iran subsequently restarted enrichment that same month (Karacasulu & Karakir 2008: 4-7). In September 2005 the IAEA Board of Governors found Iran to be in violation of the NPT. They stated that they had an "absence of confidence" in the peaceful nature of Iran's nuclear programme (Abtahi 2014: 733).

The Permanent Mission of Iran to the IAEA reacted to the IAEA's findings in a communication to the IAEA Secretariat on 12 September (IAEA 2005). Iran repeatedly pointed to the hypocrisy of other states. Iran pointed to Article VI of the NPT. This section places an obligation on signatories to "measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament" (UN 2019b). Iran claimed that two Nuclear Weapon States (a possible reference to the US and Russia) had violated this article by manufacturing new nuclear weapons. Iran also pointed to Israel's nuclear capability as a threat to the Middle-East. Iran saw the focus on its own nuclear programme as a diversion from these "immediate and serious security concerns" (IAEA 2005: 3).

Iran repeated that its nuclear programme was meant to ensure nuclear energy in the face of the rising costs of fossil fuels. Iran also felt excluded. Iran claimed that Western nuclear powers obstructed a NAM conference in 1987 dedicated to discussing the peaceful uses of nuclear energy (IAEA 2005: 4-6).

In January 2006, Iran resumed research and development of its nuclear programme. On 4 February 2006, the IAEA Board of Governors referred Iran to the UNSC. Two days later Iran suspended its implementation of the Additional Protocol and resumed enrichment. On April 11, 2006, Iran announced that it had enriched uranium to 3.5% (Karacasulu & Karakir 2008: 13; Ferguson 2011: 10; Abtahi 2014: 733; Davenport 2019).

On 31 July 2006, the UNSC adopted Resolution 1969 (UNSC 2006a). The resolution referred to the IAEA's concerns about Iran's resumed enrichment process. The Council threatened Iran with sanctions if it did not stop all enrichment-related activities.

Iran failed to do so. As result, on 23 December that same year, under Resolution 1737, the UNSC imposed sanctions on Iran. The sanctions prevented trade with Iran which could contribute to Iran's enrichment activities, or which could contribute to the development of a possible nuclear weapon delivery system. Further resolutions were adopted in 2008 (1803, 1835) and 2010 (1929). Each time the Council demanded that Iran suspend enrichment and imposed more stringent sanctions for it not doing so (UNSC 2006b; UNSC 2008a; UNSC 2008b; UNSC 2010).

In March 2007, Iran suspended its implementation of the modified Code 3.1. This left them with only the original and far less rigorous 1974 safeguards agreement. In September 2007, President Ahmadinejad gave a scathing rebuke to the UNSC and Western nations at the UN General Assembly (UN 2007: 20-21). Ahmadinejad referred to Iran's own nuclear programme as an example of the UNSC's inefficiency. He reiterated that this programme was peaceful, but that Iran had been deprived of technical assistance from other nations. One must keep in mind that the NPT obligates states to help each other's peaceful nuclear programmes. Ahmadinejad believed that the Western states had sought to "deprive the Iranian people of all their inalienable rights" (here likely referring to its nuclear rights) (UN 2007: 21). Iran believed that the Council had been abused by "the arrogant Powers" and that the sanctions were illegal. Iran also accused these states of having made military threats against it (UN 2007: 21).

In 2008 the Permanent Mission of the Islamic Republic of Iran wrote another communication to the IAEA and the UN Secretary General (IAEA 2008). It addressed the UNSC's resolutions on Iran's nuclear programme. The communication stressed Iran's "inalienable right" under the NPT to use nuclear energy for peaceful purposes. It stated that Iran had conformed to the NPT and IAEA requirements. Iran believed that the US and the EU-3 were the ones who were violating the NPT by opposing Iran's right to peaceful uses of nuclear technology. As the

communication noted, while "the Security Council has itself referred to Article IV of the NPT, at the same it violates, by its decisions, the basic rights of a State party to the Treaty" (IAEA 2008: 6). The communication went on to note a number of violations by the US and EU-3 of the NPT: the US producing Mini Nukes, the UK developing its Trident Project, and France assisting Israel to produce nuclear weapons (IAEA 2008).

These actions are examples of nuclear proliferation, which are prohibited by the NPT. For Iran, if the UNSC were really concerned with nuclear proliferation, they would have acted against vertical proliferation and existing stockpiles of nuclear weapons.

Importantly, Iran also felt excluded. The NAM, a 118 member body, supported Iran's position that negotiations on Iran's nuclear programme should take place without preconditions. However, in Iran's view the UNSC had been "fully inattentive" to the NAM's request (IAEA 2008: 10). Iran also believed that the Council had ignored Iran's responses to Resolution 1696. Furthermore, Iran repeated its complaint that it was not allowed to cooperate with others on its nuclear programme. The communication stated that "some developed countries, by establishing closed clubs, try to have an exclusive control over sensitive and important technologies" and "spare no efforts to deprive the developing countries form those technologies" (IAEA 2008: 10). Iran is excluded from its right to cooperation on nuclear technology (UN 2007: 21; IAEA 2008).

Discussions between Iran and the P5+1 were unsuccessful between 2006 and 2013. In September 2011, Arms Control Today (ACT) held a telephonic interview with Iran's IAEA ambassador, Ali Asghar Soltanieh (Crail & Soltanieh 2011). This came after Iran had allowed the IAEA access to previously forbidden facilities. Iran was not obligated to do so as the country had withdrawn from the Additional Protocol.

Soltanieh said that Iran provided the IAEA access to sensitive research and development (R&D) on advanced centrifuges. He pointed out that not even the European Atomic Energy Community (EURATOM) had provided IAEA inspectors access to its R&D and centrifuges. Soltanieh stated that full IAEA access would only be allowed after sanctions were lifted (Crail & Soltanieh 2011: 9).

Iran had rejected an offer by the then US Secretary of State, Hillary Clinton. She proposed that Iran would have had the right to enrichment in the future, but only after Iran addressed concerns about its nuclear programme. According to Soltanieh, Iran rejected it because it had the inalienable right to peaceful uses of nuclear energy under the NPT in Article IV. Clinton's call

for suspension of enrichment was a violation of that right. Iran considered it unfair that it had to suspend enrichment. As Soltanieh put it, "[s]uspsension was invented for Iran, and the verification of suspension was invented for Iran" (Crail & Soltanieh 2011: 10). He said that Iran would only take part in new negotiations if Iran was not threatened with sanctions or punitive actions. In summary, Soltanieh felt that Iran was being treated differently to other countries. It had the right to enrichment which it would not give up (Crail & Soltanieh 2011).

At that time Iran and Russia had an agreement. Under the deal Iran imported nuclear fuel from Russia. When pressed on why Iran could not simply stop enrichment and import all its necessary fuel until the international community was assured of Iran's programme, Soltanieh reiterated that Iran did not trust the international community. He mentioned America failing to repay Iran for fuel after the Iranian Revolution. Iran decided to continue enrichment by itself because of this "confidence deficit" (Crail & Soltanieh 2011: 11).

3.5.5. The Joint Comprehensive Plan of Action: 2013-2015

Despite the sanctions, by 2013 Iran had managed to build an extensive nuclear capability. It had developed a network of uranium mining, nuclear research reactors and nuclear plants, and was able to enrich uranium to 20% (Abtahi 2014: 733).

At the beginning of 2013 there were some attempts at negotiations. In a speech given by Khamenei on 7 February to the Iranian air force, he outlined the reasons as to why Iran had rejected a recent American proposal for direct negotiations. He said that Iran rejected America's offer, because it was accompanied by threats against Iran. The Americans had shown a lack of goodwill by sanctioning Iran, by supporting Iranian dissidents, by cooperating with "terrorists" in Syria, and by helping Israel to kill Iranian scientists (Khamenei 2013).

He also recalled the history of colonialism and how the "dominant powers" had always tried to make other states reliant on them. He praised Iranians for being independent and standing up "against the domination of foreigners who seek domination" (Khamenei 2013). Iran only managed to progress in technology and political influence, according to him, because it put up a resistance against these powers (Khamenei 2013).

There were fortunately more productive efforts soon afterwards. The P5+1 sought a deal with Iran in May 2013 at the Kazakh city of Almaty (Vaez 2013: 8). The P5+1 advocated for what became known as the "stop, ship, and shut" proposal. Under this deal they wanted Iran to stop

uranium enrichment at 20%, neutralize existing stockpile of 20% uranium by converting it into fuel rods or shipping it out, and disabling its underground Fordow facility. All of this in exchange for partial sanctions relief. Iran did not accept the deal. Iran reiterated its demand that the world recognise its "inalienable" right to enrich uranium. The country wanted all unilateral sanctions to be lifted in return for suspending midlevel uranium-enrichment activities (Vaez 2013: 8).

In August 2013, a more moderate Iranian president was elected, Hassan Rouhani. Khamenei gave him full authority to undertake and finalize negotiations on Iran's nuclear programme. Rouhani held an interview with the Washington Post in September to clarify his intentions. In the interview he said that Iran would give "full transparency" (implying a willingness to sign the Additional Protocol) if the West recognised Iran's legal rights (Ignatius 2013). He hoped that a solution could be reached within three months.

Rouhani was very restrained throughout the interview. There were no accusations of Western deception or threats, as Ahmadinejad often made. Instead he simply called the West's past actions "mistaken" (Ignatius 2013). However, even here he pointed to Western hypocrisy. He questioned why it is "only Iran" that has to "go through transparent steps" (Ignatius 2013).

Rouhani's desires came to fruition sooner than he had hoped. Two months later, in Geneva on 24 November 2013, the P5+1 and Iran finally agreed on an interim proposal. This became known as the Joint Plan of Action. This deal included a short term and long term agreement, called the First Step and Final Step. The First Step required Iran to halt enrichment beyond 5%, among a number of other things[1], in exchange for the P5+1 partially lifting sanctions. The Final Step required Iran to ratify the Additional Protocol in exchange for the lifting of UNSC sanctions. It also included a commitment by the seven countries to agree on a comprehensive solution within a year (Abtahi 2014: 738).

It is noteworthy that the Joint Plan of Action affirmed Iran's right to nuclear energy for peaceful purposes. This interim agreement ended by saying that after the Final Step "the Iranian nuclear programme will be treated in the same manner as that of any non-nuclear weapon state party to the NPT" (Abtahi 2014: 738).

[1] The first step also required Iran to cease construction of its nuclear plants at Natanz, Fordow and Arak; to convert existing uranium; and to allow enhanced monitoring. In return the P5+1 also promised not to introduce new resolutions or to impose new sanctions. Many of these conditions were incorporated into the JCPOA.

The seven states negotiated throughout the following two years to find a comprehensive agreement. In Vienna on 14 July 2015, the P5+1 and Iran finally signed a comprehensive nuclear deal, known as the Joint Comprehensive Plan of Action (JCPOA). This deal allowed Iran to continue with a peaceful nuclear programme in exchange for Iran's promise to never seek a nuclear weapon (JCPOA 2015).

Importantly, section iii under the Preamble and General Provisions states that the JCPOA will "enable Iran to fully enjoy its right to nuclear energy for peaceful purposes" and that "the Iranian nuclear programme will be treated in the same manner as that of any other non-nuclear-weapon state party to the NPT" (JCPOA 2015). The deal also notably emphasises the voluntary nature of the agreement. The entire document, after the Preamble, emphasises that "Iran and the E3/EU+3 will take the following *voluntary* measures" (emphasis added) (JCPOA 2015). This is particularly the case for IAEA verification and Iran's enrichment commitments. It is important because it implies that Iran was not forced to agree to these measures.

The treaty limits uranium enrichment to 3.67% for 15 years; requires a reduction of existing uranium stockpile over that limit; and obligates Iran to implement the Additional Protocol and the modified Code 3.1 of the Subsidiary Agreement. IAEA inspections are also significantly empowered. The deal includes a long-term IAEA presence in Iran; the IAEA monitoring uranium ore concentrate for 25 years; and surveillance of centrifuge rotors and bellows for 20 years. In exchange the P5+1, and the EU in general, commit to cooperate with Iran on various nuclear related activities (JCPOA 2015). Iran had never allowed such intrusive measures in any of the prior negotiations.

The deal included a draft resolution to the UNSC (later approved as Resolution 2231), lifting all previous UNSC resolutions and related sanctions on Iran, subject to the IAEA approving Iranian compliance with the deal. The deal further entailed lifting other multilateral and unilateral sanctions – both EU and American - related to Iran's nuclear programme, again subject to Iranian compliance. The JCPOA also included a commitment on the P5+1 not to introduce new sanctions on Iran unilaterally or through the UNSC. If they did so, then Iran was allowed to stop complying with the JCPOA in whole or in part (JCPOA 2015; UNSC 2015).

The JCPOA was implemented on 16 January 2016. On that day Iran was found in compliance with the agreement (Beydoun & Zahawi 2016: 50). As a result, sanctions related to Iran's nuclear activity were lifted.

3.5.6. Present concerns: 2016-2019

The JCPOA was met with concern from sceptical legislators in both the American and Iranian parliaments. They either considered the concessions to the other side to be too much, or argued that a more favourable deal could have been negotiated (Davenport 2015: 30; Tabatabai 2015: 19).

This was problematic, as a lack of American Congressional support meant that the deal was only as strong as the American president's willingness to uphold it. These concerns were realised in August 2016 with the election of American President Donald Trump. He had been sceptical of the JCPOA even before he was elected. Before his election he promised to "dismantle the disastrous deal with Iran" (Torbati 2016).

One of the chief points of contention was the expiry dates of some of the deal's provisions, which allowed Iran to enrich uranium after 15 years. There were also concerns about the JCPOA not precluding Iran from developing ballistic missiles. This was important as this allowed Iran to continue research on the delivery system for a potential nuclear weapon. In America's view, after 15 years, Iran could have the missile capability and the necessary enriched uranium to launch a nuclear attack. Trump held to his promise. On 8 May 2018, he withdrew from the JCPOA and re-imposed sanctions. This was despite efforts from the EU High Representative for Foreign Affairs, Frederica Morgherni, and the EU-3 states, to hold America to the agreement (Davenport 2017: 21; Geranmayeh 2017; Landler 2018).

The EU countries, for their part, had firmly committed to the deal and had tried to increase discussions with Iran. Both Morgherini and most of the EU members' foreign ministers had visited Tehran. They held intense talks on a number of important issues, such as economics, energy concerns and regional conflicts. Iran initially decided to hold to the deal for the time being despite America's actions (Geranmayeh 2017; Lander 2018).

On 28 July 2019, all the parties to the JCPOA, except the US, met in Vienna for an emergency meeting to salvage the JCPOA. Iran's senior nuclear negotiator, Abbas Araqchi, said Iran would continue to reduce its JCPOA commitments until the European states could guarantee Iran's interests under the deal and shield them from American sanctions. Iran had already enriched uranium beyond the 3.67% limit of the JCPOA. The six countries agreed that they had to organize a more prepared meeting soon (Knolle 2019; Metzler 2019).

There have been more attempts at negotiation since July, but without success. In late September 2019, the EU threatened to withdraw from the JCPOA if Iran continued to scale down its

commitments to the deal. Such a step by the EU would trigger the JCPOA's dispute mechanism. This would force both sides to prove compliance with the deal within 30 days, or otherwise worldwide sanctions would be automatically re-imposed (Wintour 2019).

On the first of October 2019, Politico reported that France's president, Emmanuel Macron, mediated between Trump and Rouhani in New York a week before (Momtaz 2019). They agreed in principle on a four point plan. However, Rouhani said he would not formally support it before studying all the relevant aspects. Under this deal Iran would agree not to acquire a nuclear weapon, to comply with its nuclear commitments, refrain from aggression, and accept a negotiation on a long-term agreement. In return the US would lift all sanctions imposed since 2017. It was understood, though not formally stated, that this agreement included limits on Iran's ballistic missile programme. Rouhani backed out of the deal at the last moment because of a lack of trust in Trump, and the latter's unwillingness to lift sanctions as a precondition to a formal meeting (Dadouch 2019; Momtaz 2019).

3.6. Conclusion

Iran has been invaded and manipulated throughout modern history by Western states. Today Iran is a regional power with a respectably sized economy and military. However, Iran is rivalled economically and militarily by its enemies, both in the region and internationally. These include Saudi-Arabia, Israel, the United States and the European Union. Iran's relationship with the West is complicated by a number of factors other than its nuclear programme. Chief among these are Iran's record on human rights, perceived support for terrorism, and regional intervention.

Iran's nuclear programme has been active for more than 60 years. American concerns about the peaceful nature of the programme arose long before the Revolution. However, it has only been since 2002 that a number of high level multilateral diplomatic meetings were held to discuss the nature of Iran's nuclear programme. The success of these efforts have been mixed at best. The Iranians keep reaffirming their nuclear rights as enshrined in the NPT, despite severe sanctions and international isolation. The most comprehensive deal they have reached, the JCPOA, is in significant peril at the time of writing. Recent discussions to salvage it have so far failed.

4. Analysis and findings

4.1. Introduction

This chapter presents a case analysis of the diplomacy surrounding Iran's nuclear programme. It is argued that Iran's diplomatic actions and motivations can be understood as an example of norm subsidiarity. Norm subsidiarity has influenced Iran's diplomatic engagements with the EU-3/P5+1 and thereby altered the institution of diplomacy. The norm of peaceful uses of nuclear energy influenced Iran's motivations and diplomatic decisions when the norm was violated. Iran emphasised the norm of peaceful uses of nuclear energy, and to some extent the norm of self-determination, repeatedly in its diplomatic negotiations. Iran, which supported these norms, considered it inappropriate when other actors violated them. The EU-3/P5+1, in turn, were less concerned about these norms and therefore often did not consider it inappropriate to violate them.

Iran supported these two norms each time it believed that these norms were violated, or when Iran believed that dominant powers were trying to exclude Iran from these norms by limiting its capacity to express them. Alternately, Iran and the EU-3/P5+1 always reached an agreement every time these states guaranteed Iran's right to these norms, and undertook efforts to address Iran's perceptions that its sovereignty was being violated and its right to nuclear cooperation was being refused.

Iran was, and remains, truly interested in the norms of peaceful uses of nuclear energy and self-determination. These norms were never made secondary to more "rational" concerns such as national security or economic efficiency. Iran never compromised on these rights when other states tried to force them to do so. Iran only ever gave *voluntary* concessions when it believed that such efforts would enforce these rights over time (for instance, voluntarily restricting enrichment under the JCPOA in exchange for a recognition of Iran's right to enrichment).

This analysis in turn supports the main argument of the research. Materially weaker states can and do support international norms successfully. They do so against the will of powerful states who often violate these norms in a hypocritical and exclusionary way. Weaker actors do so in order to protect their autonomy from powerful actors. Iran has successfully supported the NPT, and more specifically Article IV, which speaks to the norm of peaceful uses of nuclear energy, because of Western hypocrisy and exclusion, and in the face of international sanctions and isolation.

This chapter begins with an overview of possible realist and liberal explanations for Iran's behaviour. It is then argued that a conventional constructivist approach using norm subsidiarity provides the best explanation. Discussing realism and liberalism, and their explanatory weaknesses, will help to demonstrate the usefulness of norm subsidiarity as an alternative explanation. It begins to do so by showing how Iran's identity matches that of a "system dissatisfied state", which makes the country more likely to promote norm subsidiarity. This is followed by an examination of Iran's motivations in its diplomatic agreements: Iran rejected international agreements when it perceived that the dominant international actors were being hypocritical or were trying to exclude Iran from enacting its norms. This in turn ties in to Iran's cognitive priors of self-determination and sovereignty. Where these priors were triggered, Iran rejected agreements. Where they were addressed, Iran and the P+5 reached an agreement.

Realism and liberalism are then revisited to reveal their limitations, and to show how norm subsidiarity serves as a superior explanation of Iran's actions. The conclusion then shows how Iran's actions serve as an example of norm subsidiarity. This in turn supports the argument that materially weaker states have significant agency to promote international norms in order to protect their autonomy from more powerful states.

4.2. Alternative explanations

Both realists and liberals would explain Iran's actions by viewing them as rational exercises of Iran's self-interest. Norms are merely secondary concerns, and are often only used to hide a state's more important underlying self-interest.

Realism

Realists believe that states are concerned with the relative material power between states. As the world is anarchic, states need to increase their hard power by themselves or collectively against stronger rivals to ensure their survival. Sovereignty and self-determination are therefore the most powerful motivations for states in international affairs.

Realists would argue that Iran sought autonomy from the influence of the P5+1 by developing nuclear weapons. Iran's explanations that its nuclear programme was meant to address energy concerns, and its promises to never develop nuclear weapons, are merely excuses to hide its actual national security concerns.

Iran has far more cost-effective energy options than nuclear power. These include gas, wind, and geothermal energy (Vaez & Sadjadpour 2013). Iran has a scarcity of uranium resources, and most of what it has is of low quality. Mining uranium also requires water, which is itself a scarce resource in Iran. As Vaez & Sadjadpour (2013) put it, "Tehran's rationale for investing in nuclear energy, especially in uranium enrichment, is consistent neither with the realities of its resource endowments nor with the near-term needs of its energy sector".

Realists would argue that if nuclear energy was not the most effective energy option, then the only rational reason to choose nuclear energy over its alternatives would be to develop a nuclear weapon. Absent such a weapon, Iran's preoccupation with its nuclear programme only damaged its security. Iran did not have the hard power to compete with its regional rivals (Israel and Saudi-Arabia) or the United States and its allies. Therefore the simplest and most secure answer, in a realist view, is that Iran is protecting its nuclear programme so that it can develop a nuclear weapon.

Additionally, the IAEA verifying Iran's compliance to a nuclear deal is itself suspect. In the realist view international organizations are seen as submissive to powerful states. Indeed, Iran has in the past doubted the independence of the IAEA in respect of Western powers. Iran therefore had few reasons to agree to any limitations on its nuclear programme.

Liberalism

Liberals, similarly to realists, would recognise Iran's national interests. However, liberals believe that states are more concerned about absolute gains, and are therefore more prone to cooperate with each other, even if one state benefits more than another. Liberalism is also more concerned with the mutual benefit of economic relations between states and the role of interdependence in reducing the likelihood of war. Liberalism further values democracy and political and economic pluralism in fostering peace.

Iran, from this viewpoint, is not concerned about the overwhelming power-disparity between itself and its rivals per se. Prior to the Revolution, Iran showed a desire to cooperate on its nuclear programme with a variety of states. These included Russia, China, the European Union, Argentina, South Africa, and initially even the United States. However, Iran is a semi-authoritarian state characterised by numerous human rights abuses. Iran's reluctance to cooperate with Western states was due to its desire to keep the Iranian regime in power.

Cooperation with the West could have led to more pressure on Iran to liberalize and enact democratic reforms. This in turn would have empowered domestic rivals to Iran's regime. This explains why Iran's chief allies in its nuclear programme after the Iranian revolution were Russia and China, two other authoritarian countries. South Africa during apartheid and Argentina under military rule also fit this description.

4.3. Iran's identity as a system-dissatisfied state

This analysis argues that in contrast to realism and liberalism, a conventional constructivist explanation centring on norm subsidiarity, best explains Iran's actions. This approach focuses on the influence of identity on state actions. It also allows for norms to be important factors, regardless of the material power of a given state promoting them. According to constructivism, the identity of Iran is thus an important factor when explaining Iran's actions. More specifically, within norm subsidiarity Iran can be described as having the identity of a "system-dissatisfied" state.

Acharya (2014: 100-101) argues that some Third World countries might be more concerned about great power hypocrisy because they feel marginalized in a Western created and dominated international system. They feel dissatisfied with the system status quo. As a result, system-dissatisfied weak states are more prone to employing norm subsidiarity to mitigate against their marginalization.

Iran's identity fits this description. Since the Iranian Revolution, the country had been acutely aware of its position in relation to the West. The Iranian regime itself arose during the Revolution in an effort to banish Western influence from inside it. Khamenei (2019) said that with the Revolution, the Iranian people "broke out of the shell of subservience and humiliation which had been imposed on them" and that under the leadership of Pahlavi the British and Americans "used to be in control of everything in this country" and "enjoyed this domination". Iran's subsequent invasion by Iraq with Western support, helped to make them more sensitive to feelings of Western control. As such, Iran's existence, history, and current international standing are geared towards opposing the American-dominated system as it stands.

On an ideological level, as a Shia state, Iran is also "system-dissatisfied". Shia Islam is only dominant in three countries, apart from Iran itself: Iraq, Bahrain, and Azerbaijan. Iraq is weak,

and somewhat under pressure by the United States. Saudi-Arabia dominates Bahrain, and Russia dominates Azerbaijan. Iran is the only independent and anti-Western Shia country.

In material terms, Iran is also not able to match its Arab rivals such as Saudi-Arabia, or even Israel. Both of these are Western allies. Only in Qatar, Yemen, Iraq and Syria does Iran have any noteworthy influence. The only significant multilateral partners Iran seems to have is the NAM, which is often excluded from consideration (as discussed below). Iran's identity as an anti-Western, minority Shia, and relatively weak state, does indicate that the country is a "system-dissatisfied state".

4.4. Hypocrisy and exclusion

As discussed in the second chapter, acccording to Acharya (2014: 99-100) perceptions of great power hypocrisy and exclusion are two of the main triggers of norm subsidiarity.Iranian perceptions of Western hypocrisy and exclusion were the dominant themes informing Iran's actions on its nuclear programme. The dominant powers, especially Western ones, often act hypocritically. They accuse Iran of violating the NPT while they themselves do so by producing more nuclear weapons. These states also try to exclude Iran from discussions on the latter's nuclear programme by ignoring Iran's responses and the responses of Iran's allies, especially the NAM. The P5+1 also try to exclude Iran from the latter's right to peaceful uses of nuclear energy by taking measures to force Iran to refrain from enacting this right.

Hypocrisy

Iran had repeatedly pointed to hypocrisy on the part of the West and the P5+1 in general as motivations behind its actions. Iran pointed to the P5+1's production of new nuclear weapons, their support for Israel's nuclear programme, and how they forced Iran to adopt more stringent nuclear standards compared to other actors.

Iran repeatedly pointed to Russian and American vertical nuclear proliferation; Britain working on its Trident project; Israel's nuclear capability; and the P5+1's dismissal of other important affairs as examples of hypocrisy by the P5+1. After the impositions of sanctions, this hypocritical aspect became even stronger. The West, in Iran's view, were accusing Iran of violating the NPT while they themselves were violating it. Iran believed that it had conformed to the NPT as the right to nuclear enrichment is enshrined in the treaty. As such, for them it

was a case of blatant hypocrisy to be falsely accused of violating the treaty by states that were in fact doing so too.

Iran having to subject itself to additional transparency measures further came across as deeply hypocritical. This is most obvious in Iran having to sign the Additional Protocol, the modified Code 3.1, and other transparency measures, even though Western states and agencies such as EUROTAM did not have to. Different standards were applied to Iran's research programme compared to other Western and Arab countries.

The power disparity between Iran and the P5+1 reinforced this dynamic. Iran is a materially weak state who conformed to the international norm of peaceful uses of nuclear energy. However, Iran was pressured by far more powerful states to violate this norm. Iran was therefore not able to force these international actors to respect this right expressed in the NPT. All it could do was to reemphasise its own commitment to the NPT and to point out the violations by other states.

This explains Iran's constant reference to nuclear energy for peaceful purposes as its "inalienable right". This term is significant for two reasons. First, the term is found in the NPT itself. Iran's repeated reference to its "inalienable right" showcases its support for this international treaty. Second, as the right is inalienable, it emphasises the fact that no state is allowed to violate this right, regardless of its international standing and power.

Exclusion

Exclusion is another norm subsidiarity trigger. Iran was excluded from two norms, and it was excluded from negotiations. Iran was excluded by powerful states from both its right to nuclear energy for peaceful purposes and its right to nuclear cooperation with other states. Iran was also excluded by these states when negotiating on these issues. They tried to limit Iran's responses and ignored the NAM's comments.

The international concern with Iran was centred on excluding Iran from its rights to peaceful uses of nuclear energy, and its right to cooperation on nuclear energy. The EU-3/P5+1 often sought to refuse Iran its right to nuclear energy by demanding that Iran stop enrichment. Iran never gave in to this demand. This was seen when the IAEA in 2003, and the UNSC, at various times demanded for Iran to do so. The United States unilaterally, both before and after the JCPOA, also repeated this demand. The US often wanted Iran to cease enrichment as a

precondition for negotiations. As a result, Iran was triggered to reinforce its right to enrichment as a result of international pressure to stop it. This is linked to the country's cognitive priors of self-determination and sovereignty. The P5+1 were in effect demanding that Iran violate its sovereignty by having its actions determined by outside forces. When they did do so, Iran reacted by reinforcing its right by continuing enrichment.

Exclusion from nuclear cooperation is also relevant. Prior to 2002, Iran had a host of nuclear agreements with the United States (initially), European countries, Russia, China, Argentina, and others. These relations were cut short. The US actively sought to prevent China from helping Iran in the 1990s, and the UNSC sanctions prevented other states from cooperating with Iran on nuclear matters. Iran also often pointed to dominant powers who tried to deprive Iran specifically, and the NAM in general, from nuclear technology. Iran believed that the West obstructed a NAM conference dedicated to peaceful uses of nuclear energy in 1987.

With regards to exclusion from these two norms, the international community succeeded in the second, but not in the first. They successfully managed to exclude Iran against its will from nuclear cooperation with other states, but they had not been able to stop Iran from pursuing its right to develop nuclear energy for peaceful purposes.

The third area of exclusion lies in the negotiations themselves. This was reflected in UNSC Resolution 1696. This resolution demanded that Iran cease enrichment. Iran believed that the UNSC ignored Iran's response to this resolution. According to Iran, the UNSC "did not even wait for Iran's response" (IAEA 2008: 10). Exclusion was also prevalent with regards to the NAM. The UNSC did not agree to the NAM's request that negotiations between Iran and the P5+1 should take place without preconditions. In summary, Iran's responses were ignored, and its allies, a multilateral group consisting of more than a hundred developing states, were also ignored.

The two main conditions for norm subsidiarity are hypocrisy and exclusion. Iran experienced both. It experienced hypocrisy by the P5+1. They violated the NPT by requiring Iran to adopt more stringent nuclear standards, supporting Israel, and themselves developing nuclear weapons. Iran was also excluded from its right to nuclear cooperation, its right to nuclear energy for peaceful energy (though without success), and from discussions around these issues.

4.5. Triggering Iran's cognitive priors

Perceptions of hypocrisy and exclusion are consistent with Iran's cognitive priors. As Lee and McGahan (2015: 538) note in the second chapter, cognitive priors of a state can serve as triggers for norm subsidiarity when they are violated. Drawing from the previous chapter, Iran's cognitive priors can be considered to be self-determination and sovereignty. Its history of subjugation to the West, especially under Western support for the Shah and Iraq's invasion, led to more importance being given to self-determination and sovereignty. Iran showed that it wanted to develop its nuclear programme by itself without being dependent on others. Other states did not have the right to stop Iran or to interfere in Iran's nuclear programme.

Iran's cognitive prior of self-determination is related to its support for the norms of peaceful uses of nuclear energy, as well as the norm of cooperation with other states on nuclear energy. Iran explicitly tied these two norms to its right to self-determination. As it said in its communication to the IAEA in 2008, Iran's right to "peaceful uses of nuclear technology is a clear example of the realization of 'the right to development', 'right to natural resources' and 'right to self-determination'" (IAEA 2008: 5).

The failed negotiations and agreements between Iran and the EU-3/P5+1 were the result of the latter being insensitive to Iran's cognitive priors. There are many examples of this. One is Iran turning down Secretary's Clinton's offer in 2011 that Iran would be allowed to enrich uranium in the future, which again denies Iran its right to enrichment. Yet another example is the early 2013 "stop, ship, and shut" proposal, which limited enrichment beyond 20%. The more recent proposals in 2019 also reflect insensitivity to Iran's cognitive priors. The United States repeatedly demanded that Iran cease enrichment as a precondition for lifting sanctions. All of these proposals were triggering Iran's cognitive priors of self-determination.

In contrast, every agreement in which Iran's cognitive priors were addressed were successful. The October 2003 agreement with the EU-3 is a clear example. Iran was sceptical of the deal because it thought the Additional Protocol would violate Iranian sovereignty, and because it had been refused nuclear cooperation with other states. The EU-3 actively eased these concerns by explicitly saying that the Protocol did not intend to violate Iran's sovereignty and that it would cooperate on nuclear technology. They also recognised Iran's right to peaceful uses of nuclear energy, and by extension, its right to self-determination.

Iran's cognitive priors of sovereignty and self-determination were seemingly violated, which led to an initial process of subsidiarity on Iran's part. However, the EU-3 addressed these priors,

which led to a successful agreement. The 2004 agreement was similarly successful when the EU-3 recognised Iran's right under the NPT to peaceful uses of nuclear energy.

The JPOA and JCPOA are together the most powerful examples of how addressing Iran's cognitive priors led to successful agreements. The texts of both the JPOA and JCPOA acknowledged Iran's right to nuclear energy for peaceful purposes, and both explicitly promised that Iran's nuclear programme would be treated in the same way as other non-nuclear weapon states. As such, by recognising Iran's right to nuclear energy, the P5+1 in these two agreements addressed Iran's cognitive prior of self-determination. Iran was allowed to continue its nuclear programme if it wished to do so. The P5+1's promise to treat Iran the same way as other states was, in turn, a promise to no longer apply double standards in respect of Iran's nuclear programme. This promise in effect meant that the P5+1 would no longer be hypocritical by treating Iran's programme differently from the programmes of other states. Treating Iran's programme in the same way also implied that Iran would get the nuclear assistance that it had been excluded from.

Furthermore, the JCPOA very clearly noted that Iran's concessions were voluntary. This further reassured Iran's cognitive priors of self-determination and sovereignty. The careful wording of the JCPOA, and the acknowledgements of Iran's cognitive priors, helped to make the treaty the most comprehensive of all the prior agreements. The contents of the JCPOA, following the preamble, is taken under the condition that both "Iran and the E3/EU+3 will take the following voluntary measures" (JCPOA 2015). The treaty subsequently managed to attain the most concessions from Iran compared to previous offers, including limiting uranium enrichment for 15 years, and allowing the IAEA to monitor Iran's uranium ore for a quarter of a century. It is unlikely, based on Iran's concern for its self-determination and its previous decisions, that Iran would have allowed these measures if the P5+1 tried to force it to do so.

4.7. Reflections on realism and liberalism

The explanations of both realism and liberalism to Iran's actions are insufficient. Both of them capture elements that are relevant, but neither of them explain all of Iran's actions sufficiently. In contrast, a constructivist account of norm subsidiarity offers the most compelling explanation.

Realism

Realists are correct in recognising the importance which Iran attributed to sovereignty and self-determination. Iran sought to maintain some independence from the much stronger P5+1 states and Iran's regional rivals. However, for Iran, self-determination was not an end in itself.

What a realist explanation fails to address is the fact that Iran did not give in to the demands of the P5+1, despite not having a nuclear weapon, and being vastly outmatched in hard power. The military threats made by the United States reduced Iran's security. The lack of economic resources, due to sanctions, also weakened Iran's ability to maintain the hard power that it already had.

Realists also fail to give an adequate explanation for Iran's own motivations. Realists would argue that Iran's promise not to develop nuclear weapons was a lie. This explicit statement by Iran is ignored in favour of an assumption that Iran is intending to do the opposite: to develop nuclear weapons.

Lastly, realism gives no explanations as to why some deals between Iran and the P5+1 were successful, and why others failed. Iran has shown a willingness to allow restrictions on its nuclear programme which can prevent it from developing a nuclear weapon. The JCPOA especially provides a significant setback to any possible clandestine production of a nuclear weapon. The significantly improved powers of the IAEA in Iran also shows some level of trust by Iran in the Agency's independence.

Liberalism

Liberalism is correct to recognise Iran's desire to cooperate with other states on its nuclear programme (even if only authoritarian ones), but it fails to provide an explanation for the focus on nuclear energy. As realists point out, there are far more efficient energy options for Iran to utilize. The emphasis on nuclear power as opposed to other types therefore requires an explanation.

Vaez and Sadjadpour (2013) point out that a number of Middle Eastern states have successful, modern and cost-effective nuclear power capabilities. The United Arab Emirates, Saudi-Arabia, Qatar and others have signed numerous nuclear deals with South Korea, France, Britain, Japan and the United States. These Arab states have also signed the Additional Protocol

and additional safety mechanisms. As Vaez and Sadjadpour (2013) put it, “It is true that after a fifty-six-year-long journey, Iran now has an indigenous nuclear infrastructure that distinguishes it from other countries in the region. Yet, the country’s nuclear power plants are not as modern, commercially competitive, and safe as those that its neighbo[u]rs are likely to procure for a fraction of Iran’s time and capital investment”.

All of these Arab countries are also autocratic and deeply Islamic, especially Iran’s main rival: Saudi-Arabia. Qatar, an Iranian ally, also cooperated with Western powers on its nuclear programme. This begs the question as to why other autocratic, Middle Eastern countries, were willing to cooperate with Western powers on their nuclear programmes, but not Iran. It is not clear why Iran would be a unique case. If anything, cooperation with the West would have increased Iran’s economic position and made the regime stronger over possible domestic rivals. As with realism, it is also not clear why other deals with the West have failed. Some of the failed agreements offered a removal of sanctions in exchange for less stringent transparency measures than those adopted in the JCPOA.

Constructivism and norm subsidiarity

A conventional constructivist approach that applies norm subsidiarity provides the best explanation for Iran’s actions. It agrees with realism that Iran did want a measure of autonomy from materially stronger powers. However, this desire for autonomy extends to the ideational realm. Iran wanted to protect the international norm of peaceful uses of nuclear energy against much stronger states. Iran was willing to protect it even at the cost of increased insecurity and economic sanctions.

Iran did so because it valued its right to nuclear energy for peaceful purposes as an end in itself. Iran would not compromise on this norm. Iran supported this norm through a logic of appropriateness, rather than through a logic of consequentialism. For Iran the norm of the peaceful use of nuclear energy was just as important, if not more so, than traditional concerns for security.

A constructivist approach also addresses the explanatory weaknesses of liberalism. Iran’s nuclear programme is not the same as that of Saudi-Arabia and other similar regional autocratic regimes. This is because Iran’s identity as a system-dissatisfied state, with a history of Western abuse, and its cognitive priors of self-determination and sovereignty, made it sceptical of

cooperation with the West. Saudi-Arabia is an ally of the United States, and the Gulf States are content with an American dominated international system. Iran, in contrast, is intrinsically opposed to this system.

Furthermore, a more normative lens explains Iran's emphasis on nuclear power as opposed to alternatives, without imputing ulterior motives to Iran. Iran is not predominantly concerned with economic efficiency. The P5+1's demands on Iran to cease its nuclear programme therefore influenced Iran. They made Iran choose nuclear power over more efficient means as a way to reinforce its right to nuclear power for peaceful purposes. This norm took precedence over economic concerns.

This explains why proposals by the P5+1 that did not allow Iran to enact this norm on its own terms failed. Iran simply did not want to compromise this right even if doing so would have had economic and security benefits. In many of the successful agreements, Iran voluntarily accepted limitations on its right to peaceful uses of nuclear energy, but only after being assured that this right was being respected.

4.8. Conclusion

Iran's nuclear programme is a clear example of norm subsidiarity in diplomatic practice. Iran's diplomatic decisions and the motivations behind its actions have been influenced by perceptions of hypocrisy and exclusion. Its cognitive priors, when they were violated, led to Iran rejecting international deals with the EU-3 or P5+1.

Iran amplified the international norms of peaceful uses of nuclear energy and self-determination as a result of Western hypocrisy and exclusion, so as to protect its autonomy. Iran supported these norms whenever its cognitive priors of self-determination and sovereignty were being violated. This explains why certain agreements failed whereas others such as the JCPOA succeeded.

Iran's decisions further cannot be explained from either a realist or liberal perspective. Iran never compromised on its right to nuclear energy for peaceful purposes. It did not do so despite it being more cost-effective and more secure to cooperate with international, Western, actors.

Iran has been largely successful. It has developed an independent system of uranium mining and enrichment. This is despite Iran's extremely weak material capability compared to the P5+1. This is not to say that Iran has been completely successful. It is still uncertain whether

Iran and the United States will reach an agreement. If not, the Europeans or Iran may also withdraw from the JCPOA. Nonetheless, Iran's success goes beyond what it "should" have been able to achieve as a materially weaker state. Iran has shown significant agency despite its material shortcomings. Iran's application of norm subsidiarity shows that weaker states have significant agency to support accepted international norms against the wishes of powerful states.

The analysis further supports the third wave of norm diffusion scholarship, which focuses on the role of materially weaker states. It is not merely powerful states who are important actors in the process of norm diffusion. Weaker states are also important actors who support international norms. They do not only accept, contest, or localize them. They can and do play a positive role by actively supporting existing international norms, even if these weaker states were not the original promoters of these norms. The analysis also disconfirms Panke and Petersohn's (2016) argument that norms fail when materially strong states violate them. Iran, a materially weak state, successfully defended the right to nuclear energy for peaceful purposes despite the norm's violation by the much stronger P5+1.

The analysis further contributes to the study and practice of diplomacy. The decisions states make in diplomatic negotiations are influenced by international norms. More specifically, materially weaker states, such as Iran, are prone to making decisions based on whether or not its norms are respected. Negotiations and agreements that respect the rights of weaker states are more likely to succeed than those that do not respect their rights.

The research fulfilled its aim. It challenged the assumptions of the first two waves of norm diffusion scholarship. It did so by arguing that materially weaker states do in fact have significant agency to support international norms. This in turn helped to address the original research question. Norm subsidiarity, exercised through the practise of diplomacy, helps one to understand the ability of weaker states to promote international norms. Weaker states do so as a result of perceptions of hypocrisy and exclusion by powerful states. Weak states promote international norms to protect their autonomy from more powerful states. Iran's actions serve as an example of this. It showed significant agency in successfully supporting the norm of the peaceful use of nuclear energy against the wishes of the far more powerful P5+1.

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