

# ELITE PARS

Law Firm



## Introduction

Established in 2019, Elite Pars is a boutique law firm with professional lawyers and legal minds as its core team. Lawyers at Elite Pars render legal advice on a wide range of matters in parallel to dealing with various local, regional and international arbitration and litigation cases.

Elite Pars draws strength from its diversity. We recruit from a wide variety of backgrounds, seeking out the best and those with the highest potential and we invest in their development. Our profound knowledge of assorted legal areas, enables us to efficiently guide our clients through the most complex matters they are facing. Furthermore, our practical experience provides us with insights that help us assist our clients in achieving their legal goals.

In case you have any queries regarding this document or would like to inquire as to how we could serve you best, please feel free to contact our partners Dr. Navid Sato and/or Dr. Nima Nasrollahi via [n.sato@elitepars.com](mailto:n.sato@elitepars.com) and/or [n.nasrollahi@elitepars.com](mailto:n.nasrollahi@elitepars.com).



LEGAL UPDATE: DECEMBER 2025

**IRAN'S NON-OIL TRADE HITS \$76.5 BILLION MILESTONE AMID VOLUME GAINS AND VALUE CHALLENGES**

In the initial eight months of the Iranian calendar year spanning March 21 to November 22, 2025, the nation's non-oil trade activities recorded a total volume of 131.054 million tons with a monetary value of \$76.537 billion, as per records from the Islamic Republic of Iran Customs Administration. This figure indicates a slight uptick of 1.53 percent in physical quantity compared to the prior year, yet a notable drop of 9.38 percent in overall worth.

Exports during this timeframe amounted to 105.231 million tons valued at \$36.997 billion, showing a modest 1.17 percent rise in tonnage but a 3.48 percent decline in financial returns. Prominent export items encompassed natural gas, liquefied propane and butane, methanol, various hydrocarbon gases, gas condensates, petroleum bitumen, urea, non-alloy iron and steel billets, iron or steel bars, and polyethylene.

The surge in export quantities stems partly from domestic energy constraints affecting industrial and mining operations, prompting a pivot toward shipping out unprocessed materials such as iron ore concentrate and pellets rather than refining them locally; for instance, iron ore concentrate shipments jumped by 82 percent in the first seven months relative to the previous year, sparking worries among steel producers about potential raw material scarcities for further processing.

On the import side, the country brought in 25.823 million tons worth \$39.540 billion,

with a 3 percent growth in weight but a sharp 14.29 percent fall in value. Essential imports featured corn feed, soybean meal, genetically modified soybeans, rice, sunflower seed oil, smartphones, tractors, and automotive components.

A key factor widening the trade gap was the influx of over \$8 billion in raw gold bars, representing 11.12 percent of import expenditures and highlighting efforts possibly aimed at bolstering reserves or stabilizing currency amid external pressures. Leading export markets included China at \$14.8 billion, Iraq at \$11.9 billion, the United Arab Emirates at \$7.2 billion, Turkey at \$6.8 billion, Pakistan and Afghanistan each at \$2.4 billion, and India at \$1.9 billion, collectively making up 82.3 percent of non-oil export revenues and emphasizing Iran's strong ties with Asian and regional neighbors under sanction limitations.

For imports, top suppliers were the United Arab Emirates at \$21.9 billion, China at \$19.3 billion, Turkey at \$12.4 billion, Germany at \$2.4 billion, India at \$1.7 billion, Hong Kong around \$1.4 billion, and Russia at \$1.3 billion, covering 83.8 percent of inflows. Looking back, the full previous Iranian year ending March 20, 2025, saw non-oil exports climb to 152 million tons at \$57.8 billion, up 10 percent in volume and 15.62 percent in value, while imports stood at 39.3 million tons for \$72.4 billion, yielding a \$14.6 billion deficit.

Current patterns reveal resilience in handling volumes but underscore vulnerabilities like diminished production from energy issues, which favor raw exports at the expense of domestic value addition, alongside a continued dependence on foreign essentials for sustenance and tech needs. The emphasis on non-oil sectors aims to lessen oil reliance, with robust showings in petrochemicals and

minerals, though sustaining imports remains crucial for security and advancement, and the gold surge might tie into broader financial strategies in a restricted global setting.

From a foreign investment standpoint, these dynamics open doors for international players in diversifying Iran's economy through sectors like manufacturing and technology, as outlined in the Vision 2025 strategy that promotes non-oil growth to attract capital.

Recent unveilings of unnamed projects signal efforts to draw overseas funds, despite modest inflows like \$1.2 billion in direct investment amid oil export levels of 1.5-1.7 million barrels per day. Free trade zones have seen a 54 percent rise in foreign commitments in early 2025, while events like Iran Expo 2025 serve as gateways for global engagement, offering risk-mitigated avenues in resilient markets with GDP growth forecasts around 3.1 percent. Investors can leverage regulations for international businesses, focusing on non-oil exports that constitute 11 percent of GDP, to tap into emerging prospects despite geopolitical hurdles.

#### **IRAN'S GREEN ENERGY REVOLUTION: 157% CAPACITY JUMP IN 18 MONTHS**

Over the last 18 months, Iran has dramatically ramped up its renewable and clean energy infrastructure, elevating installed capacity from 1,230 megawatts at the onset of the fourteenth administration to 3,165 megawatts by the close of November 2025, according to the Renewable Energy and Energy Efficiency Organization.

This impressive expansion, driven chiefly by solar and wind installations, is distributed across various regions, with Markazi leading at 459.01 megawatts, Isfahan at 394.94

megawatts, and Yazd at 325.85 megawatts, supported by optimal weather, facilities, and active stakeholder involvement in areas like Kerman, Qazvin, Razavi Khorasan, and Semnan. Wind generation stands out, with Qazvin as the frontrunner at 164.38 megawatts, positioning it as the country's primary wind power center, trailed by East Azerbaijan at 52.65 megawatts and Razavi Khorasan at 51.30 megawatts, aiding in energy diversification and network reliability.

Nationwide, over 600 sites are in progress, poised for activation by September 2026, while green electricity traded on the energy exchange averaged 51,518 rials per kilowatt-hour last November. The ecological advantages are profound, conserving roughly 29 billion liters of water, 30 billion cubic meters of fuel, and averting 65 million tons of CO2 releases.

This progress is bolstered by fresh policies this year, such as offering loans in local currency for 50- to 1,000-kilowatt solar setups, streamlining transfers of gear funded by the National Development Fund, and permitting decentralized renewable builds for industrial, mining, and farming operations. Further actions involve outfitting 10 training facilities for sector education and exploring commodity exchange supplies for equipment.

In terms of foreign investment appeal, this rapid scaling highlights Iran's push for sustainable energy security, drawing over \$260 million for 53 new ventures and \$485 million across 67 approvals, signaling openness despite fiscal strains. Ambitions to source 10 percent of electricity from

renewables by 2025, potentially reaching 30 percent, align with \$35 billion targets through joint ventures with neighbors, while the market's 15.4 percent compound growth to \$22.7 billion by 2030 invites tech transfers from partners like China in solar and storage. Strategic funds could prioritize renewables for long-term yields, fostering international collaborations in a BRICS-influenced global shift.

#### **IRAN'S PETROCHEMICAL POWERHOUSE: \$24 BILLION FRESH INVESTMENTS ON HORIZON**

To date, Iran's petrochemical landscape has absorbed over \$95 billion in capital, with plans for an extra \$24 billion under the Seventh National Development Plan, complemented by \$18-20 billion in active initiatives, as stated by the National Petrochemical Company's leader during a December 22, 2025, event on gas management and efficiency.

These efforts, involving private entities, target better energy use and consumption control, with pacts inked among major players like Pardis, Khorasan, and Zagros, plus state and academic partners. Incentives, negotiated with the central bank, reward firms cutting household gas use by letting them transform savings into exports, tackling imbalances and enhancing outflows. The industry is also building 2,500 megawatts of renewables, eyeing 1,000 megawatts operational soon to ease power demands.

As a cornerstone for jobs, currency influx, and stability, it processes 1.5 billion cubic feet of gas daily into high-value goods. Public-private

synergy, including employers' groups, drives mega-projects, with widespread indirect ownership via pensions urging trust-building. Broader collaboration with education, society, and citizens seeks to curb wasteful gas by plan's end.

For foreign investors, this positions the sector as a prime target, with \$10 billion eyed in near-term projects and \$22 billion allocated, including \$12 billion underway, amid 60 percent completion of plan initiatives. As a wealth engine contributing 8 percent to GDP and 30 percent to non-oil exports, it offers golden chances, with \$18 billion needed for full capacity and \$26 billion for 131.5 million tons output, plus 61 new facilities over five years.

#### **DEFYING ODDS: IRAN-EU TRADE CLIMBS TO €3.1 BILLION AMID RESTRICTIONS**

In the first ten months of 2025, trade between Iran and the European Union totaled €3.102 billion, with EU exports to Iran at €2.452 billion—mainly machinery, chemicals, and industrial components—and imports from Iran at €650 million, including agricultural products, food, carpets, and limited industrial goods. October contributed €219 million in exports and €63 million in imports, sustaining a pattern despite sanctions limiting transactions to indirect, compliant channels. Germany leads at €984 million or 31 percent, followed by Italy, the Netherlands, and Spain, though volumes are below pre-2018 levels due to U.S. withdrawal from the nuclear deal, which intensified barriers in banking, shipping, and insurance.

In 2024, total trade was €4.5 billion, with EU exports at €3.7 billion and imports at €0.8 billion, focusing on essential sectors. Recent EU measures in September 2025 reinforced asset freezes, trade bans, and financial limits, yet trade persists in permissible areas.

Iranian officials aim to expand in technology, renewables, and pharmaceuticals, but geopolitical issues and UN snapback sanctions in October 2025, with exemptions for existing contracts until 2026, hinder new ventures. This resilience highlights Iran's diversification from oil, with EU machinery aiding modernization amid shortages, and non-oil exports supporting currency stability.

From a foreign investment perspective, persistent ties signal opportunities in compliant sectors like renewables and infrastructure, with \$485 million in approved inflows reflecting efforts to attract capital despite challenges. Global FDI dipped to \$1.5 trillion in 2024, but Iran's market offers European investors tech transfer prospects in sustainable areas, with 2026 projections emphasizing returns via humanitarian channels to navigate risks and support diversification. Sanctions create a resilient system needing foreign expertise for efficiency, enabling joint ventures in non-prohibited fields aligned with EU sustainability policies for long-term gains.



## **Dr. Navid Rahbar Sato**

### **Managing Partner**

Dr. Navid Rahbar Sato is a founding partner and the managing director of Elite Pars Law Firm. He is a qualified international and domestic lawyer in the Iranian market with a primary focus on cross border transactions and oil and gas law. With several years of experience, he has extensive comprehension of the national, regional and international commercial legal systems. He also handles litigation and arbitration cases where he sets out the legal strategies and heads the team in the process. He particularly advises clients on energy law, foreign direct investment, incorporation, mergers and acquisitions as well as import and export regulations in the region including sanctions' compliance matters.

Navid holds an SJD from Washington College of Law and is a Vanderbilt LL. M. graduate of NYU School of Law and an International Trade Law LLM graduate of the American University of Washington D.C. He is an assistant professor at Shahid Beheshti University of Tehran. Navid speaks fluent Farsi and English, as well as basic French and Japanese.

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## **Dr. Nima Nasrollahi Shahri**

### **Partner**

Dr. Nima Nasrollahi Shahri is a founding partner at Elite Pars Law Firm and heads the energy, investment law and arbitration practices of the firm. He is a seasoned lawyer in the field of oil and gas and renewable energies and has advised major international oil companies with respect to their participation in Iranian oil and gas projects. He holds a PhD in International Investment Law and has completed the LL. M. program of University of Dundee in Petroleum Law and Policy. He has a long list of Persian and English publications and is currently the director of oil and gas law LL. M. program at the

University of Science and Culture in Tehran where he is now supervising several dissertation theses, mostly related to the same field as well as commercial arbitration. Nima regularly does pro bono educational activities. He speaks Farsi, fluent English and intermediate French and Arabic.

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