

Mandates of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran; the Special Rapporteur on the promotion and protection of human rights in the context of climate change; the Special Rapporteur on the human right to a clean, healthy and sustainable environment; the Special Rapporteur on the right to food; the Independent expert on the promotion of a democratic and equitable international order; the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes and the Special Rapporteur on the human rights to safe drinking water and sanitation

Ref.: AL USA 18/2026

(Please use this reference in your reply)

15 July 2026

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the situation of human rights in the Islamic Republic of Iran; Special Rapporteur on the promotion and protection of human rights in the context of climate change; Special Rapporteur on the human right to a clean, healthy and sustainable environment; Special Rapporteur on the right to food; Independent expert on the promotion of a democratic and equitable international order; Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes and Special Rapporteur on the human rights to safe drinking water and sanitation, pursuant to Human Rights Council resolutions 58/21, 57/31, 55/2, 58/10, 57/7, 54/10 and 51/19.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning alleged environmental damage and related public impacts reportedly resulting from armed attacks attributed to the armed forces of the United States of America and the State of Israel against civilian-related infrastructure in the Islamic Republic of Iran.

According to the information received:

Between 28 February 2026 and the date of this communication, a series of attacks were allegedly carried out against infrastructures (in particular, in Khuzestan and Bushehr provinces) water desalination infrastructure, oil reservoir facilities, and dual-use petrochemical facilities.

Reported Attacks on Water Desalination and Treatment Infrastructure

According to information received, on 6 March 2026, water treatment and desalination facilities, as well as related water and electricity infrastructure, on Qeshm Island in southern Iran were reportedly struck. These facilities are said to have supplied approximately 12,000 to 15,000 liters of drinking water, and the attacks allegedly deprived around 30 villages of access to fresh water. Separately, water pumping stations in Khorramabad, urban reservoirs in Khomein and desalination units in Haftkel are reported to have sustained damage or destruction during the same period. In addition, on 10 June 2026, district water tanks in Bemani were reportedly targeted, damaging a key reservoir serving about 20,000 people in the surrounding area. The alleged

pattern of strikes on water infrastructure, across Qeshm Island, Khorramabad, Khomein, and Haftkel raises serious concerns that the civilian water supply system may have been deliberately or repeatedly targeted rather than incidentally affected.

Reported Attacks on Oil Reservoir Facilities (7 March 2026)

On 7 March 2026, three fuel reservoir facilities in Tehran, namely in the Shahr-e-Rey district (northwest), Shahr-e-Rey (south), and Kuhak in the Sohanak region (northeast), were reportedly struck, by forces of State of Israel, with the support and coordination of the United States. These facilities are reported to have a combined storage capacity of approximately 215 million litres of fuel. The strikes reportedly triggered large fires and dense plumes of black smoke over the Tehran metropolitan area, which has a population of approximately 13 million. The intensity of the fires reportedly prevented firefighting personnel from approaching the source for up to 24 hours. Preliminary environmental assessments by the Iranian governmental authorities, which have not yet been independently verified, indicate estimated atmospheric releases of approximately 517,000 tonnes of carbon dioxide, 495 tonnes of particulate matter (PM2.5 and PM10), 792 tonnes of nitrogen oxides, 16.5 tonnes of sulfur oxides, and 2,189 tonnes of volatile organic compounds, including benzene, a known human carcinogen. Information received further indicates that the intensity of the smoke and odor caused by the fires led to the displacement of a significant number of residents from the city in the immediate aftermath of the strikes. Local reports documented cases of shortness of breath, eye irritation, and throat irritation among residents; while medical centres across Tehran Province were placed on high alert as a result.

Independent international experts reportedly characterized the pollution generated by the strikes as comparable in severity to a major industrial accident, with immediate effects on respiratory health and longer-term risks of cancer and chronic disease, with concerns regarding risks to food, water, air quality, and a healthy environment, particularly for children, older people, and persons with pre-existing conditions. Special concern arises regarding individuals with pre-existing respiratory and cardiovascular illnesses, pregnant women, children, older persons, and persons with disabilities, who may be disproportionately affected by exposure to air pollution.

Rainfall reported on the day following the attacks is said to have produced acid rain over Tehran and surrounding areas. Information received further indicates concerns that runoff may have carried petroleum compounds and heavy metals into drainage systems, soils, and potentially groundwater resources, including in the Shahr-e-Rey, historically an important agricultural zone supplying the Tehran metropolitan area. This information raises serious concern about possible contamination of groundwater and agricultural land.

Information received further indicates concern that petroleum-related pollutants, combustion by-products, and heavy metals released during the attacks may have entered agricultural soils and water systems. Such contamination may affect all ecosystems related to food security, including crop

safety, animal safety, fisheries and agricultural productivity, and may create longer-term risks.

Further available information indicates that cultural and historical sites in Tehran may have been affected by acid and black rain caused by the fires following the oil reservoir strikes. The source material specifically identifies the following sites as having been affected by these environmental impacts: Golestan Palace (a UNESCO World Heritage Site), the Grand Bazaar, and Marmar Palace, as having sustained damage in this context, separate from strikes reportedly occurring in the vicinity of some of these sites. Additionally, the limestone, marble, glazed tilework, mirror work, and stucco ornamentation characteristic of Qajar-era structures across the affected areas are acutely susceptible to the chemical corrosion caused by acid precipitation, with potentially irreversible consequences.

Reported Civilian and Environmental Impacts of Strikes on Asaluyeh Industrial Hub, Bushehr Province (18 March 2026)

On 18 March and 6 April 2026, the Asaluyeh industrial hub in Bushehr Province, the largest petrochemical complex in Iran, was targeted by airstrikes. On 6 April 2026, the Mobin and Damavand utility plants, which supply water, electricity, and oxygen to multiple petrochemical facilities, were destroyed. This allegedly resulted in forced shutdowns, power outages, or reduced operations across several facilities responsible for a significant share of Iran's petrochemical production.

Following the strikes, black smoke and visible smog remained in the air across parts of the industrial zone and surrounding areas. Some residents are said to have left their homes in the immediate aftermath owing to concerns about pollution and potentially toxic air conditions.

Reports suggest environmental concerns persisted well beyond the immediate aftermath of the strikes. As of 1 May 2026, Asaluyeh, near the Pars Special Economic Zones, had reportedly recorded some of the highest air pollution levels in the Islamic Republic of Iran, with an air quality index of 164. Information received further indicates that strikes have had adverse economic impacts on workers, as continuing shutdowns resulting from the attacks reportedly led to layoffs and unemployment.

Reported Civilian and Environmental Impacts of Strikes on Mahshahr Special Economic Petrochemical Zone, Khuzestan Province (4-6 April 2026, 8 June 2026)

On 4 April 2026, multiple facilities within the Mahshahr Special Economic Petrochemical Zone in Khuzestan Province were reportedly targeted by airstrikes. The facilities allegedly affected include the Razi Petrochemical Complex, as well as the Karun, Bandar Imam, Fajr 1, and Fajr 2 units. Reports suggest that utility and energy infrastructure supplying electricity and water to the wider petrochemical zone suffered significant damage, resulting in operational shutdowns and disruptions across multiple facilities in the area.

Further information received indicates that the strikes had direct civilian and environmental impacts in the days followed, including large fires, power outages, smoke, and lingering haze across the area. Additional reports document claims of sulphur and ammonia odours in the air, particularly in humid conditions. Some residents reportedly left Mahshahr temporarily owing to concerns about toxic pollution and possible chemical exposure. Shortly after the strike, the Republic of Iran government officials acknowledged the presence of smoke emissions, while generally denying the existence of dangerous toxic contamination or major gas leaks.

Open-source information refers to casualties and injuries among civilians present at the time of the strikes, as well as increased pressure on local hospitals. Particular concern is raised regarding workers present at affected petrochemical installations, who may have been exposed to smoke, combustion products, chemical releases, and other hazardous substances arising from the attacks and their aftermath. Reports further indicate adverse labor related impact, including layoffs, reduced wages, removal of overtime and employment benefits, unpaid salaries, and concerns regarding unemployment arising from the continued shutdown of parts of the petrochemical zone. Information received also raises concern regarding broader ecological damage, including air pollution, chemical emissions, and potential long-term environmental harm to surrounding ecosystems in southern Iran.

On 8 June 2026, the Karoun Petrochemical Company located in Mahshahr Petrochemical Zone was once again struck during the resumption of hostilities. The full impacts of this latest strike have yet to be assessed. Concerns have also been raised regarding the persistence of contaminants associated with damaged industrial facilities, fuel storage infrastructure, and munitions residues. Such contamination may affect soil, water resources, ecosystems, and human health beyond the immediate period of active hostilities. Crucially, ecosystems degradation and toxic pollution also cause climate harm, negatively impacting on carbon sinks and on human resilience in the context of worsening climate change.

Transboundary Implications

The foregoing raises potential transboundary concerns, given that all States on the southern coast of the Persian Gulf rely heavily or exclusively on desalination plants for drinking water, including Qatar and Kuwait (100 per cent dependent), the UAE and Bahrain (97 per cent dependent), and Saudi Arabia (65 per cent dependent). Information received indicates concern that disruption to Persian Gulf water quality through oil contamination, acid rain runoff, or operational disruption caused by the conflict could affect desalination plant operability in those States.

Information received additionally raises concern that the extended idling of commercial and oil tankers in the Persian Gulf as a result of the conflict has created a further environmental risk. Reports suggest that the continued discharge of ballast water by vessels idling in the Gulf may facilitate the transfer

of invasive species and pathogens into Gulf waters, with potential harm to coral reefs and marine ecosystems.

Without prejudging the accuracy of these allegations, we express serious concern that the reported attacks described above may implicate a number of obligations under international human rights law, including the rights to life under article 6 of the International Covenant on Civil and Political Rights (ICCPR); to the highest attainable standard of physical and mental health under article 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR); to an adequate standard of living, including adequate food and water, under article 11 of the ICESCR; and to a clean, healthy and sustainable environment, as recognized by General Assembly resolution 76/300 and Human Rights Council resolution 48/13.

The reported strikes on petrochemical infrastructure in Mahshahr and Asaluyeh raise additional and distinct concerns, including with respect to healthy occupational and environmental conditions under article 12(2)(b) of the ICESCR, and the right to an adequate standard of living and just and favorable conditions of work under articles 11 and 7 of the ICESCR, in light of the reported worker casualties, toxic exposure, and employment harms documented in the source material.

The allegations further raise serious concerns under international humanitarian law, including the rules on distinction, proportionality, necessity, and precautions in attack, the special protection afforded to objects indispensable to civilian survival, the protection of the natural environment under AP I articles 35(3) and 55, and the potential application of Rome Statute article 8(2)(b)(iv). Detailed reference to the applicable instruments and standards is set out in the Annex to this communication.

Military activities themselves, and the climate harm caused through emissions and degradation of carbon sinks, also raise serious concerns about international environmental and human rights obligations on climate change as clarified by the International Court of Justice in its 2025 Advisory Opinion.

Contamination resulting from military activities has profound and lasting consequences for both human health and the environment. These impacts are not limited to combat zones or active warfare; they occur before, during and after military conflict. Toxic exposure affects not only military personnel but also civilians and communities, often in violation of international law. Addressing military-related toxic contamination is essential for the protection of human rights, human health and the environment. States and international bodies must take meaningful action to uphold human rights and prevent exposure to hazardous substances that result from military activities.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information, comments, or clarifications in relation to the above-mentioned allegations, including the military objectives alleged to have been targeted, any precautionary measures taken to limit civilian and environmental harm, and any assessment of the civilian impact of the strikes described above.
2. Please clarify what steps your Government has taken, or intends to take, to assess the environmental impact of the attacks described above, including with respect to air quality, soil and groundwater contamination, marine and ecosystem harm in the Zagros region, and potential transboundary effects on Persian Gulf water supplies.
3. Please indicate what measures your Government are taking to ensure accountability for any violations of international human rights law and international humanitarian law arising from the attacks described above, including with respect to command responsibility.
4. Please indicate whether your Government is undertaken, or plans to undertake, any assessment, remediation, compensation, or other reparation measures in relation to the alleged environmental, public health, food security, and cultural heritage damage described above.
5. Please indicate what measures your Government has taken to assess and address the public health consequences of the strikes on petrochemical infrastructure in Mahshahr and Asaluyeh, including with respect to toxic emissions, civilian casualties, air quality monitoring, greenhouse gas emissions, and the provision of evacuation warnings to affected communities, especially consideration of more vulnerable populations to this contamination.

This communication, and any response received from your Excellency's Government, will be made public via the communications reporting [website](#) at the 60 days mark. Should Your Excellency's Government respond within 60 days, both the communication and the response, may be published before the 60 days mark. The communications and responses will also be made available in the subsequent periodic report to be presented to the Human Rights Council.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

Please be informed that a letter on this subject matter has also been sent to the Islamic Republic of Iran, and those state that are involved in alleged strikes against the Islamic Republic of Iran, including Israel.

Please accept, Excellency, the assurances of our highest consideration.

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Annex

Reference to international human rights law

In connection with above alleged facts and concerns, we would like to draw the attention of your Excellency's Government to the following international instruments and standards.

International Human Rights Law

Right to Life – ICCPR, article 6

Article 6(1) of the International Covenant on Civil and Political Rights (ICCPR) affirms that every human being has the inherent right to life and that this right shall be protected by law. In general comment No. 36 (CCPR/C/GC/36), the Human Rights Committee confirmed that the right to life encompasses a State's obligation not to engage in activities whose reasonably foreseeable consequence is a threat to the lives of individuals (para. 22). The use of methods or means of warfare whose foreseeable consequence is large-scale environmental contamination posing risks to the health and lives of millions of civilians raises serious concerns under this provision.

Right to Health – ICESCR, article 12; CESCR general comment No. 14 (E/C.12/2000/4)

Article 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) recognises the right of everyone to the enjoyment of the highest attainable standard of physical and mental health, including through the improvement of environmental and industrial hygiene (article 12(2)(b)). In general comment No. 14 (E/C.12/2000/4), the Committee on Economic, Social and Cultural Rights affirmed that the right to health encompasses access to safe and potable water and adequate sanitation, an adequate supply of safe food, and healthy occupational and environmental conditions (para. 11). Paragraph 34 identifies the failure to take measures to reduce the detrimental health effects of environmental pollution as a violation. Paragraphs 34 and 50 expressly address destruction or disruption of medical facilities and infrastructure during armed conflict as violations of article 12.

The reported strikes on petrochemical infrastructure in Mahshahr and Asaluyeh raise additional concerns under this provision: the documented reports of sulphur and ammonia exposure, worker casualties, and hospital pressure in the aftermath of the Mahshahr strikes engage the occupational and environmental health dimensions of article 12(2)(b) and paragraph 11 of general comment No. 14. The sustained air pollution recorded in Asaluyeh, including an air quality index of 164 as of 1 May 2026 according to Hamshahri, further engages the obligation to take measures to protect against the health effects of environmental pollution. The reported layoffs, unpaid salaries, and loss of livelihood arising from prolonged facility shutdowns additionally raise concerns under article 11 of the ICESCR, which guarantees the right to an adequate standard of living, and article 7, which protects the right to just and favourable conditions of work.

Right to Food – ICESCR, article 11; CESCR general comment No. 12 (E/C.12/1999/5)

Article 11(1) of the ICESCR recognises the right of everyone to an adequate standard of living, including adequate food. In general comment No. 12, the Committee affirmed that the right to food requires, inter alia, that food be accessible and free from adverse substances (para. 8). The reported contamination of agricultural land and water sources as a foreseeable consequence of attacks on oil infrastructure in a food-producing region raises serious concerns under this provision.

Right to Water – ICESCR, article 11; CESCR general comment No. 15 (E/C.12/2002/11)

In general comment No. 15, the Committee on Economic, Social and Cultural Rights affirmed that the right to water encompasses the right of everyone to sufficient, safe, acceptable, physically accessible, and affordable water for personal and domestic uses (para. 2). The reported destruction of water desalination and treatment facilities serving civilian populations raises serious concerns under this provision.

Right to a Clean, Healthy, and Sustainable Environment – UNGA resolution 76/300 (2022); HRC resolution 48/13 (2021)

We wish to refer to Human Rights Council resolution 48/13 of 8 October 2021 and General Assembly resolution 76/300 of 29 July 2022, which recognize the right to a clean, healthy and sustainable environment as a human right. These resolutions underscore that all States have a duty to respect, protect, and fulfill this right.

In addition, the International Court of Justice, in its 2025 Advisory Opinion on State obligations on Climate Change, has clarified that the human right to a clean, healthy and sustainable environment is a “precondition”, “inherent,” and “essential” for the enjoyment of all other human rights, notably in the context of climate change.

Precautionary principle

Principle 15 of the 1992 Rio Declaration requires States to apply the precautionary approach where there are threats of serious or irreversible damage, even in the absence of full scientific certainty. Principle 17 requires environmental impact assessment in relation to proposed activities likely to have a significant adverse impact. The ICJ confirmed in *Pulp Mills on the River Uruguay* (2010, para. 204) that the obligation to carry out an environmental impact assessment has become a requirement of general international law. Military operations with potentially severe and irreversible environmental consequences raise serious concerns under these principles.

The International Court of Justice, in its 2025 Advisory Opinion on Climate Change, has also clarified that States have customary and treaty obligations, of stringent due diligence, to prevent significant harm to the environment and the climate system in accordance with the precautionary principle.

International Humanitarian Law

Distinction and Protection of Civilian Objects – AP I, articles 48 and 52; Customary IHL rule 7

Article 48 of Additional Protocol I establishes the fundamental rule of distinction, requiring parties to a conflict to distinguish at all times between civilian objects and military objectives, and to direct their operations only against the latter. Article 52(1) prohibits attacks on civilian objects. Customary IHL rule 7 confirms this prohibition. Water desalination facilities, cultural and heritage sites, and fuel infrastructure serving civilian populations are presumptively civilian objects absent sufficient information demonstrating that they were making an effective contribution to military action.

Proportionality – AP I, article 51(5)(b); Customary IHL rule 14

Article 51(5)(b) of Additional Protocol I prohibits attacks expected to cause incidental loss of civilian life, injury to civilians, or damage to civilian objects that would be excessive in relation to the anticipated concrete and direct military advantage. Customary IHL rule 14 confirms the prohibition on disproportionate attacks. The foreseeable environmental and civilian health consequences of attacks on oil storage infrastructure in a city of 13 million raise serious questions as to compliance with the proportionality rule, and may engage this provision. The strikes on petrochemical and utility infrastructure in Mahshahr and Asaluyeh raise analogous concerns, as the destruction of utility plants supplying water, electricity, and oxygen to multiple downstream facilities in operating industrial zones had foreseeable consequences for worker safety, public health, air quality, and livelihoods across surrounding communities; these consequences must be weighed against the concrete and direct military advantage anticipated from each attack.

Military necessity – AP I, Article 52(2); Customary IHL Rule 8

Article 52(2) of Additional Protocol I requires that attacks be directed only against military objectives, namely objects which by their nature, location, purpose or use make an effective contribution to military action and whose destruction, capture or neutralization, in the circumstances ruling at the time, offers a definite military advantage. Customary IHL rule 8 confirms this definition as a rule of customary international humanitarian law. The strikes on oil storage, petrochemical, and utility infrastructure therefore raise serious questions as to whether each targeted facility qualified as a military objective at the time of attack, and whether its destruction offered a definite, concrete military advantage rather than merely a general economic or strategic effect. Where utility plants supplying water, electricity, or oxygen to downstream civilian or industrial facilities were attacked, the necessity assessment must examine whether those objects made an effective contribution to military action and whether their neutralization was strictly connected to a definite military advantage, particularly in light of foreseeable consequences for worker safety, public health, air quality, and surrounding. In addition, **AP I article 54** prohibits attacking, destroying, removing or rendering useless objects indispensable to the survival of the civilian population, subject only to narrow exceptions, including direct support to military action and, in limited circumstances, imperative military necessity.

Precautions in Attack – AP I, article 57; Customary IHL rule 15

Article 57 of Additional Protocol I requires parties to take all feasible precautions in the choice of means and methods of attack to avoid and in any event to minimise incidental civilian harm. Customary IHL rule 15 confirms this obligation. The alleged targeting of oil storage facilities in a densely populated urban area, with foreseeable acute and long-term environmental consequences, raises concerns as to whether all feasible precautions were taken. The reported strikes on dual-use petrochemical and utility infrastructure in Mahshahr and Asaluyeh raise the same question in a distinct operational context. The foreseeable consequences of striking utility plants integral to the functioning of large industrial zones, including toxic emissions, worker casualties, and prolonged shutdowns affecting civilian livelihoods, are relevant to the assessment of whether feasible precautions were taken to avoid or minimise those harms.

Protection of the Natural Environment – AP I, articles 35(3) and 55; Customary IHL rule 44

Article 35(3) of Additional Protocol I prohibits the employment of methods or means of warfare that are intended, or may be expected, to cause widespread, long-term, and severe damage to the natural environment. Article 55(1) requires care to be taken in warfare to protect the natural environment against such damage. Customary IHL rule 44 confirms these obligations. The reported attacks on Tehran's oil reservoir facilities, and the potentially widespread and long-term environmental consequences noted above, may engage these provisions and raise serious concerns as to compliance. I further recall that the ICJ, in the Advisory Opinion on *Legality of the Threat or Use of Nuclear Weapons* (1996, paras. 30-33), affirmed that obligations of environmental protection under international law apply during armed conflict.

Protection of Objects Indispensable to Survival – AP I, article 54; AP II, article 14; Customary IHL rule 54

Article 54(2) of Additional Protocol I prohibits attacks on objects indispensable to the survival of the civilian population, including drinking water installations and supplies and irrigation works. Article 14 of Additional Protocol II contains a corresponding rule. Customary IHL rule 54 confirms this prohibition as applicable in both international and non-international armed conflict. Water desalination and treatment facilities serving civilian populations fall within the scope of these provisions.

Potential War Crime: Excessive Incidental Environmental Damage – Rome Statute, article 8(2)(b)(iv)

Article 8(2)(b)(iv) of the Rome Statute defines as a war crime the intentional launching of an attack in the knowledge that it will cause incidental loss of life or injury to civilians, damage to civilian objects, or widespread, long-term, and severe damage to the natural environment, that would be clearly excessive in relation to the concrete and direct overall military advantage anticipated. The alleged attacks on major oil storage facilities in a densely populated city, with the foreseeable environmental

consequences described above, may raise concerns under this provision. Whether the precise legal threshold is met would require further factual and legal assessment.

Protection of Cultural Property – 1954 Hague Convention; AP I, articles 53 and 85(4)(d)

The 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict and its Protocols prohibit attacks on cultural property and require parties to refrain from any act of hostility directed against it. Article 53 of Additional Protocol I prohibits acts of hostility directed against historic monuments, works of art, or places of worship constituting the cultural or spiritual heritage of peoples. Article 85(4)(d) characterises attacks on such objects as grave breaches. To the extent that the foreseeable consequences of the reported attacks included damage to protected cultural heritage, including a UNESCO World Heritage Site, without military necessity justification, these instruments may be engaged.