

EXPORTS GOODS PROHIBITED TO IRAN UNDER SNAPBACK

DATE: 12 December 2025

This **Advisory Note** is produced by the Australian Sanctions Office (ASO) to inform the regulated community of a developing issue presenting significant sanctions risk. It provides a summary of relevant sanctions laws but does not cover all possible sanctions risks. Users should consider all applicable sanctions measures and seek independent legal advice. This document should not be used as a substitute for legal advice. Users are responsible for ensuring compliance with Australian sanctions laws.

THE SNAPBACK MECHANISM

In 2015, the United Nations Security Council (UNSC) adopted UNSC Resolution 2231 endorsing the Joint Comprehensive Plan of Action (JCPOA). This allowed the UNSC to have oversight of Iran's nuclear activities in return for sanctions relief as long as certain conditions (such as access for the International Atomic Energy Agency) were met. The resolution also contained a mechanism through which the suspended sanctions against Iran could be 'snapped back' into effect if Iran failed to comply with its obligations under JCPOA.

On 28 August 2025, France, Germany and the UK triggered the 'snapback' of international sanctions on the basis that Iran had not complied with the JCPOA by exceeding the maximum allowed uranium stockpile; undertaking prohibited enrichment activities; and obstructing international verification and monitoring.

On 28 September 2025, the UNSC sanctions that were eased under the JCPOA were automatically reimposed by the UNSC. The measures include a full arms embargo on Iran; export bans on nuclear and ballistic missile related goods; a prohibition on providing services related to the export of nuclear and ballistic missile related goods; and asset freezes on individuals and entities.

Australia implements UNSC sanctions through Australian domestic laws, including the Charter of the United Nations Act 1945 and its regulations. These prohibitions were reimposed under Australian domestic law from 12 December 2025.

GOODS PROHIBITED BY SNAPBACK

Regulation 8 (meaning of *export sanctioned goods*) of the Regulations specify the following documents as listing goods covered by snapback:

- INFCIRC/254/Part 1
- INFCIRC/254/Part 2
- S/2010/263
- Annex to Resolution A/RES/46/36 L

Goods listed in INFCIRC/254/Part 1, INFCIRC/254/Part 2, S/2010/263, and the Annex to Resolution A/RES/46/36 are included in the Defence and Strategic Goods List 2024, which is a legislative instrument specifying goods, technology, and software regulated under Australian export control laws.

These controlled goods are listed in the [annex](#). Where practical, the ASO has mapped these goods to the most applicable Heading in the Australian Harmonized Export Commodity Classification (AHECC) code.

TARGETED FINANCIAL SANCTIONS

A number of [Targeted Financial Sanctions](#) on entities and individuals were also imposed under 'snapback.' These sanctions have been added to the [consolidated list](#).

IMPORTANT CONSIDERATIONS

- **For Guidance Only:** The goods listed in the annex are provided as a practical tool to assist with initial screening and should not be relied upon as a comprehensive or definitive list of all goods covered by the snapback mechanism.
- **Limitations of AHECC Codes:** Many controlled goods are highly technical and specific, whereas AHECC codes are broad and may cover both controlled and uncontrolled items within the same code. As a result:
 - Some AHECC codes will include non-controlled goods.
 - Some controlled goods may not be uniquely identified by any AHECC code.
 - Some goods may be captured under multiple AHECC codes.
- **Verification Required:** The list of goods to AHECC codes should only be used as a preliminary filter. Any positive matches must be cross-checked against the technical descriptions in the relevant control lists. For any goods that may be controlled, you must seek legal, regulatory, or compliance advice before taking any further action or making export decisions.
- **No Substitute for Legal Advice:** This list does not constitute legal advice or a determination of export control status. The user is responsible for ensuring compliance with all applicable sanctions laws.

FURTHER INFORMATION AND RESOURCES

Further information is available on the [Department's website](#), or by making an enquiry to sanctions@dfat.gov.au.

[Iran sanctions framework](#) | Australian Government Department of Foreign Affairs and Trade

[Advisory Note – Sanctions & proliferation financing](#) | Australian Government Department of Foreign Affairs and Trade