Australian Government
Department of Foreign Affairs and Trade

Australian Sanctions Office

Annual Report 2025

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The Australian Sanctions Office (ASO) is the Australian Government's sanctions regulator. The ASO was established within the Department of Foreign Affairs and Trade (DFAT) in 2020.

Australia's sanctions frameworks equip the Australian Government to respond flexibly and effectively to situations of international concern. Sanctions are one of the tools available to the Government to impose costs on foreign actors that behave contrary to Australian values and national interests. This includes individuals, entities, and governments that threaten international security, undermine good governance and the rule of law, and violate civil and human rights.

Sanctions help prevent funds from Australia reaching these actors. They disrupt terrorist groups, deter cyber-attacks and cybercrime, counter the proliferation of weapons of mass destruction, and signal Australia's commitment to international rules and norms.

The Government implements two types of sanctions:

- United Nations Security Council (UNSC) sanctions, including counter-terrorism financing sanctions and country-based sanctions, in line with Australia's obligations under international law, and
- autonomous sanctions, which Australia imposes as a matter of foreign policy.

The Government implements UNSC sanctions through the Charter of the United Nations Act 1945 (COTUNA) and its regulations. Autonomous sanctions are made under the Autonomous Sanctions Act 2011 and its regulations.

The Government's autonomous sanctions frameworks have increased in number and complexity as threats to international security and violations of norms have grown. Australia often implements autonomous sanctions in coordination with partners, as sanctions can be most effective when their impacts are amplified in this way. While sanctions frameworks, processes and legal thresholds differ between countries, and each partner maintains a unique, but complementary, set of sanctions, coordination has an amplifying effect much greater than the sum of individual actions.

The Government takes a balanced and judicious approach to ensure autonomous sanctions achieve their intended objectives while minimising secondary impacts for Australian businesses and individuals. Decisions to impose autonomous sanctions are considered carefully and on a case-by-case basis.

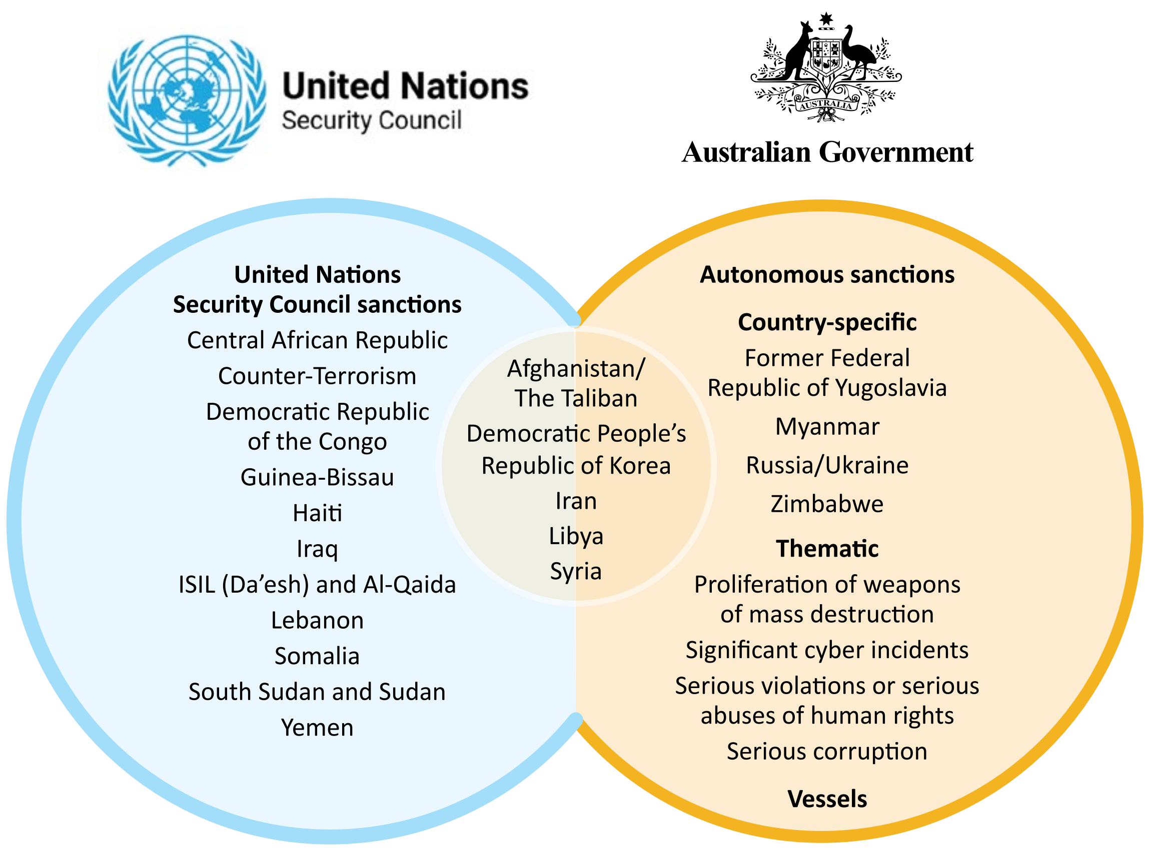


Figure 1. Sanctions frameworks in force under Australian law at the end of 2025:

2025 overview

In 2025, the Government updated the COTUNA regulations to reflect the UNSC's reimposition ('snapback') of sanctions on Iran. The Government imposed financial sanctions on individuals associated with terrorist organisations, including Hamas. Under its autonomous sanctions frameworks, the Government imposed sanctions in response to Russia's invasion of Ukraine, human rights violations against Palestinians, cybercrime funding the DPRK's weapons program, and domestic cyber-attacks. This included Australia's first ever action against shadow fleets to prevent Russia from evading sanctions. The Government also established a pioneering framework for Afghanistan and imposed the first sanctions under that framework, targeting the Taliban.

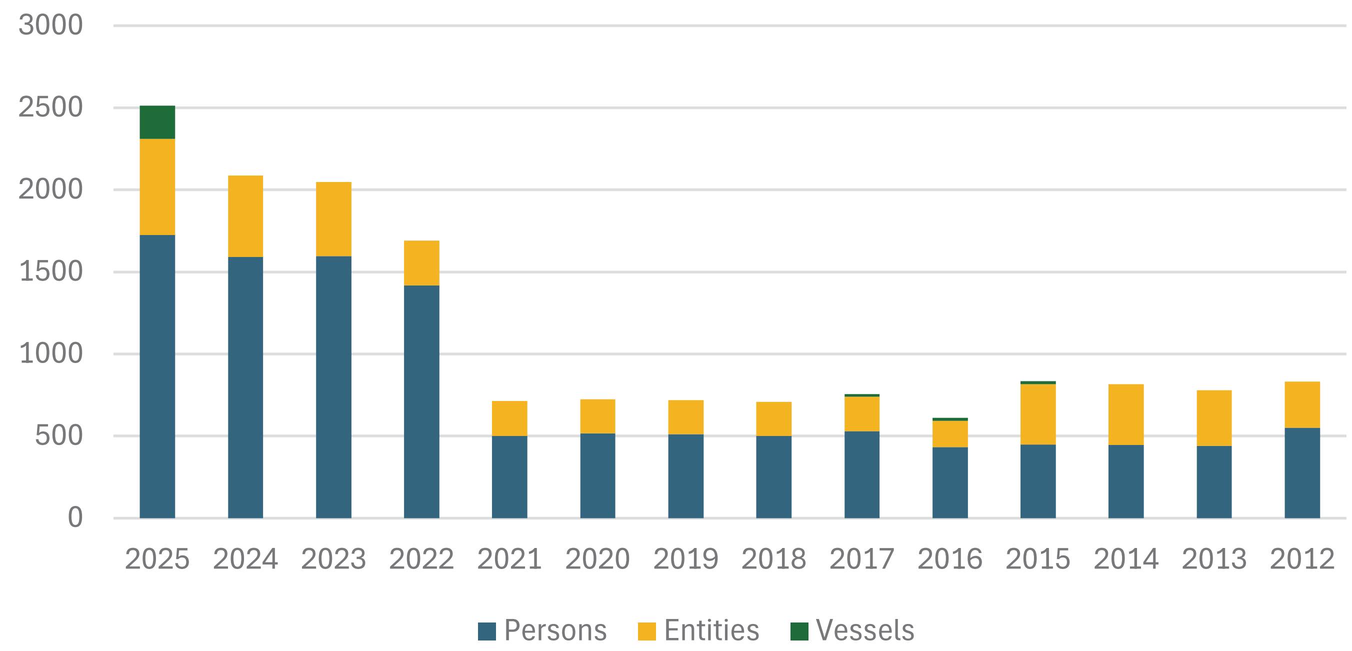
The Government imposed 428 new autonomous sanctions in 2025, bringing the total to 2,512 (see Figure 2). The Government imposes autonomous sanctions under 14 frameworks. Some of these are thematic and address cyber incidents, corruption, or human rights abuses, for example. Others, such as those contained in the Government's new Afghanistan framework, are country specific.

The Government also continued to implement 16 UNSC sanctions frameworks in 2025, including the UNSC's 'snapback' of sanctions targeting Iran's nuclear program.

By the end of 2025, the Government had imposed a total of 3,511 sanctions under both the autonomous and UNSC sanctions frameworks.

Sanctions measures include targeted financial sanctions, travel bans, vessel sanctions, as well as trade (supply and receipt) bans and restrictions on services and commercial activity.

Persons, entities and vessels listed under all autonomous frameworks as at 31 December each year



(NB: from 2017 the Australian Government has imposed sanctions on a class of Democratic People's Republic (DPRK) vessels. The Government first sanctioned individual DPRK vessels in 2015, with these sanctions subsumed into the DPRK class of vessels in 2017.)

Trends

International developments drove the Government's sanctions listings in 2025 including:

- Russia's ongoing full-scale invasion of Ukraine
- Iran's proliferation activities and the reimposition, or 'snapback', of UNSC sanctions on Iran
- malign cyber actors and cybercriminals' actions that harmed Australians
- the DPRK's pursuit of weapons of mass destruction
- the deteriorating situation in Afghanistan, including the Taliban's continued violation of the rights, freedoms and welfare of the Afghan people, particularly women and girls
- the ongoing global threat of terrorist activity
- serious violations or abuses of human rights.

Russia

In direct response to Russia's full-scale invasion of Ukraine, the Australian Government worked with likeminded countries to impose the largest and most wide-reaching global sanctions effort of this century. The scale of international cooperation has been pivotal in preventing Russia from achieving its military and political objectives in Ukraine and constraining Russia's ability to trade and grow economically. Sanctions also contribute to holding Russia to account for its flagrant violation of international laws and norms.

Coordinated international sanctions, which continue evolving in response to Russia's evasion tactics, have sought to starve Russia of the funds needed to sustain its war and to provide support to Ukraine. They have built upon sanctions imposed on Russia following its annexation of Crimea on 18 March 2014. Current sanctions measures include bans on the import and export of a wide range of goods, bans on commercial activities, and targeted financial sanctions and travel bans targeting specific persons and entities of economic or strategic significance to Russia. This includes a total prohibition on the importation of crude oil, refined petroleum products, natural gas, coal, and other energy products from Russia.

The Government's sanctions targeting Russia fall under autonomous sanctions frameworks dealing with Russia and Ukraine, serious human rights violations and abuses, and significant cyber incidents.

The Government's sanctions on Russia are our most innovative, wide-ranging and multi-faceted measures to date, reflecting the scale and seriousness of Russia's breach of international law, including the UN Charter.

In 2025, the Government also imposed sanctions on so-called shadow fleet vessels for the first time, delivering three sanctions packages designating a total of 200 vessels. Russia uses shadow fleet vessels to evade sanctions and sustain its war against Ukraine. By employing deceptive practices including flag-hopping, disabling tracking systems, and operating with inadequate insurance, the 'shadow fleet' enables the illicit trade of Russian oil and other sanctioned goods.

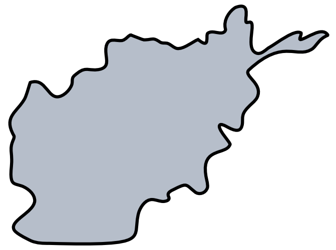
Together with likeminded partners including the US, EU, UK, Canada and New Zealand, the Government also applies an Oil Price Cap (OPC) to drive down the market value of Russian crude oil and starve the Russian war economy of oil revenue. With OPC partners, we lowered the cap to US$47.60 in 2025, putting further pressure on Russia's revenue sources. The OPC means Australian individuals and companies can only provide transport and financial services in relation to Russian-origin oil and refined petroleum products when those products are purchased by third countries below the price cap. The UK Government estimates that coordinated sanctions imposed a cost of US$450 billion on Russia from February 2022 to February 2025, including direct losses to state revenue of US$154 billion.[1] Australia's sanctions have contributed to these efforts.

1. For more information see: www.gov.uk/government/publications/estimating-the-impact-of-sanctions-on-russias-war-efforts/estimating-the-impact-of-sanctions-on-russias-war-efforts

Significant listings and new sanctions frameworks in 2025

Increasing pressure on Russia: In 2025, the Government imposed an additional 417 sanctions in relation to Russia, including to target persons responsible for silencing political expression and enabling Russia's invasion of Ukraine. See the box text for more information on sanctions imposed on Russia.

Cyber sanctions: The Government imposed sanctions under our autonomous cyber sanctions framework in response to several significant cyber incidents. In February 2025, Australia imposed additional cyber sanctions in response to the 2022 Medibank Private cyber attack. This was the first time the Government had imposed cyber sanctions on an entity (ZServers) and cybercriminals responsible for providing infrastructure and services to enable cybercrime. In November 2025 the Government, together with the US and UK, imposed further sanctions on two entities (Media Land LLC and ML. Cloud LLC) and two Russian individuals for providing infrastructure and services to malicious cyber actors.



Afghanistan: In December 2025 the Government established a new autonomous sanctions framework for Afghanistan, the first of its kind in the world, as part of its ongoing efforts to hold the Taliban to account. Under this framework the Government can impose directly sanctions and travel bans to increase pressure on the Taliban, targeting those responsible for the oppression of the Afghan people, particularly women and girls, as well as actions that undermine the rule of law and good governance. This new framework for Afghanistan builds on the Government's implementation of the United Nations Security Council's Taliban framework, under which the Government has sanctioned 140 persons and entities to date. The Government's autonomous framework for Afghanistan also introduces an arms embargo, prohibiting Australians from supplying arms or related materials, and any related services or activities to Afghanistan. The Government announced the first listings under the framework, on three so-called Taliban 'ministers' and the so-called Taliban 'Chief Justice', in December 2025. The Minister for Foreign Affairs also issued a class-based humanitarian permit that allows certain humanitarian activities to take place where there is no other lawful avenue to provide humanitarian assistance under the Afghanistan autonomous framework.

Iran: imposing the UNSC 'snapback': In September 2025, the UNSC reimposed sanctions on Iran for its failure to adhere to its commitments under the Joint Comprehensive Plan of Action (JCPOA), the purpose of which had been to constrain Iran's nuclear program in exchange for the lifting of sanctions on Iran. This reimposition of UNSC sanctions is commonly referred to as 'snapback'. The Government passed new regulations to give effect to these sanctions in domestic law. Sanctions reimposed included asset freezes and travel bans on 43 persons and 78 entities, a ban on the export and import of nuclear goods and material as well as ballistic missiles and arms matériel, and prohibitions on providing certain services and activities to Iran.

Counter-terrorism financing: Throughout 2025 the Government imposed new sanctions in keeping with its commitment to counter-terrorism and in response to situations of concern in the Middle East. The Australian Government has imposed counter-terrorism financing sanctions on the white supremacist terrorist network Terrorgram, as part of our ongoing work to combat antisemitism and keep Australians safe. The Australian Government was the first to sanction both the new (from May 2025) leader and military commander of Hamas and a currency exchange used to facilitate the transfer of funds and cryptocurrency to Hamas. The Australian Government has sanctioned Hamas continuously since 2001 and extended its listing as a sanctioned entity in 2025. The Government also relisted Hizballah and Palestinian Islamic Jihad as well as 30 other entities and 10 persons for counter-terrorism financing sanctions.

Violence against Palestinians in the West Bank: In June 2025, the Government imposed sanctions on senior Israeli Government ministers Itamar Ben Gvir and Bezalel Smotrich, for their roles in inciting settler violence against Palestinians in the West Bank. These sanctions were coordinated with likeminded partners: the UK, Canada, New Zealand, and Norway.

DPRK: In 2025, the Government imposed sanctions on 4 entities and one person engaged in cybercrime supporting and funding the DPRK's unlawful weapons of mass destruction and ballistic missiles programs. These sanctions, coordinated with the US, put pressure on the DPRK's illegal revenue generation networks and address its persistent challenges to international security and stability. Australia was also an active member of the Multilateral Sanctions Monitoring Team (MSMT), an initiative launched in October 2024 to monitor and report on the implementation of UNSC sanctions relating to the DPRK. MSMT seeks to fill the monitoring gap created by the disbandment of the UNSC's 1718 Committee Panel of Experts in April 2024, caused by Russia's veto in the UNSC in March 2024. The MSMT released 2 reports in 2025, 'Unlawful Military Cooperation including Arms Transfers between North Korea and Russia' in May 2025, and 'The DPRK's Violation and Evasion of UN Sanctions through Cyber and Information Technology Worker Activities' in October 2025.

Monitoring and Compliance

The expanding use of sanctions has increased the complexity of the compliance and monitoring landscape. The ASO works closely with agencies across government and in other countries to monitor trends in sanctions avoidance and non-compliance, and to respond. Serious and high-risk compliance issues result in enforcement action. For example, in 2025 the Australian Federal Police brought criminal charges against one remittance service operator for facilitating transactions with sanctioned Iranian banks. The ASO also contributed to enforcement activity conducted by the Australian Border Force and Australian Federal Police which has resulted in the identification of prohibited exports, the issuing of infringement penalties and the forfeiture of goods to the Commonwealth.

In 2025 the ASO finalised 32 compliance matters.

In 2025 the ASO conducted outreach across the regulated community to improve sanctions compliance. The ASO undertook 44 activities with a focus on the finance, legal, manufacturing, mining, and university/academic sectors. The ASO also published 9 guidance notes and 17 advisory notes on its website in 2025, available at **www.dfat.gov.au/international-relations/security/sanctions/guidance-note**.

Permits and revocations

In 2025, the ASO received 70 applications seeking a permit to undertake activities that would otherwise contravene sanctions laws. The ASO granted 18 permits and found 15 applications did not require a permit in 2025, while 21 permit applications were withdrawn and 16 remained under review at the end of the year.

The ASO also administers requests by sanctioned persons or entities for the Minister for Foreign Affairs to revoke their sanctions listing. The ASO received one such request in 2025. The Minister for Foreign Affairs also considered one revocation application received before 2025, and agreed to revoke the listing. Five applications remained on foot as of 31 December 2025.

A responsive ASO

On 1 November 2025, in response to industry feedback, the ASO issued a revised and reformatted version of the Consolidated List (which lists all persons and entities designated by Australia and the UNSC for sanctions) to improve the regulated community's ability to comply with Australian sanctions laws.

The ASO also launched a newly designed application form for sanctions permits on PAX, the ASO's portal. The update streamlined and simplified the permit application process, making it more accessible and user-friendly.

Two parliamentary inquiries into Australia's sanctions were completed in 2025. The Joint Standing Committee on Foreign Affairs, Defence and Trade undertook a legislated review of Australia's thematic sanctions framework (Inquiry into the review of the operation of the amendments made by the Autonomous Sanctions Amendment (Magnitsky-style and Other Thematic Sanctions) Act 2021). In addition, the Senate Foreign Affairs, Defence and Trade References Committee undertook an inquiry into Australia's sanctions regime. The ASO provided submissions to both inquiries and gave evidence at both public hearings.

Additionally, on 5 November 2025, the Senate referred to its Foreign Affairs, Defence and Trade References Committee for inquiry, the question of the effectiveness of sanctions against the Russian Federation. The Department provided a submission and gave evidence to the inquiry in February 2026. The Committee is due to report by 20 August 2026.

Looking ahead

In 2026, the international environment will remain complex, with Russia's invasion of Ukraine continuing, the global impacts of ongoing conflict in the Middle East unfolding, and human rights abuses remaining an issue of international concern.

The ASO will be looking for opportunities for targeted engagement with the regulated community, including Australian businesses and human rights organisations, and will continue to provide tailored guidance in response to international developments to support sanctions compliance.

Information about the ASO is available at **www.dfat.gov.au/international-relations/security/sanctions**, and the ASO can be contacted at **sanctions@dfat.gov.au**.

Annex

Autonomous targeted financial sanctions, travel bans, and vessels

Table 1. Summary of autonomous sanctions listings.

Framework	New Listings in 2025			Total in force 31 December 2025		
	Persons	Entities	Total	Persons	Entities	Total
Country frameworks						
Afghanistan	4	0	4	4	0	4
DPRK	1	4	5	28	33	61
FFRY	0	0	0	21	0	223
Iran	0	0	0	65	141	206
Libya	0	0	0	13	3	16
Myanmar	0	0	0	21	7	28
Russia and Ukraine	121	86	207	1,350	344	1,694
Syria	0	0	0	104	39	143
Zimbabwe	0	0	0	5	0	5
Thematic frameworks						
WMD	0	0	0	0	0	0
Cyber	7	3	10	12	3	15
Human rights	2	0	2	87	18	105
Corruption	0	0	0	14	0	14
Total	135	93	228	1,724	588	2,312

Table 2. Summary of COTUNA Pt 4 (counter-terrorism financing) listings.

New Listings in 2025			Re-listings in 2025			Total in force 31 December 2025		
Persons	Entities	Total	Persons	Entities	Total	Persons	Entities	Total
4	2	6	11	41	52	15	43	58

Table 3. Summary of vessels listings.

Country	New Listings in 2025		Total in force 31 December 2025	
	Vessels	Classes	Vessels	Classes
DPRK	0	0	0	1
Russia	200	0	200	0
Total	200	0	200	1