



**Human Rights Watch Submission to
Australia's Department of Foreign Affairs and Trade, Australian Sanctions Office
on proposed amendments to the Autonomous Sanctions Regulations 2011 (Cth)**

October 2025

Human Rights Watch appreciates the opportunity to provide a submission to the proposed amendments to the Autonomous Sanctions Regulations 2011 (Cth). As the [consultation documents](#) state, the proposed amendments will introduce new listing criteria that are specific to Afghanistan and would allow the Foreign Minister to impose targeted sanctions and travel bans on individuals and entities who are engaging in, responsible for, or complicit in:

- the oppression of women and girls in Afghanistan;
- the oppression of minority groups in Afghanistan;
- the general oppression of people in Afghanistan; or
- undermining of good governance and the rule of law in Afghanistan.¹

The situation in Afghanistan is the most serious women's rights crisis in the world today. The Taliban's repression is so extreme and systematic that it is critical that governments find ways to hold those responsible to account.

Human Rights Watch has long considered targeted sanctions to be an appropriate and beneficial foreign policy tool to press for accountability for serious abuses, and to raise the cost of human rights violations by denying abusers both entry to and assets in foreign countries where they seek to travel or do business. They are specific, targeting individuals or entities for abusive and unlawful behavior rather than the general population. Targeted sanctions also assist where more traditional forms of legal accountability, including through international courts, is not possible.

¹ Department of Foreign Affairs and Trade. (2025). *Exposure draft explanatory statement: Statement of compatibility of human rights* [Microsoft Word document]. Australian Government. <https://www.dfat.gov.au/sites/default/files/exposure-draft-explanatory-statement-statement-of-compatibility-of-human-rights.docx>

Human Rights Watch has [reported extensively](#) on the situation in Afghanistan. Since taking over the country on August 15, 2021, the Taliban have deepened their repression by intensifying restrictions on the rights of women and girls, detaining journalists, and silencing all dissent, among other violations.

Oppression of women and girls

In August 2021, the Taliban quickly [banned](#) education beyond sixth grade for women and girls and imposed harsh restrictions on women's [paid employment](#), including by humanitarian [aid](#) agencies. In some sectors, women's employment was banned outright. Freedom of [movement](#), even to [seek health care](#), was severely restricted; taxi and bus drivers have faced [pressure](#) to not allow women to travel alone. In 2023, a number of women were [prevented](#) from traveling for overseas scholarships. The Taliban have imposed [arbitrary](#) and [restrictive](#) dress codes, enforced by [arrest](#), and abused women simply for leaving home [without](#) a male family member chaperone. This repression has worsened over the past four years.

In 2024, the Taliban adopted and began to enforce a draconian [law](#) on the “propagation of virtue and prevention of vice” that stipulates rules on dress and behavior. Enforcement committees at the local level have carried out raids on workplaces, monitored public spaces, and established checkpoints to inspect mobile phones and question vehicle occupants and pedestrians.

Taliban officials have detained people for such alleged infractions of the law as playing music, wearing “inappropriate hijab,” or failing to sufficiently separate women from men in work environments. Strict enforcement of the requirement for women to be accompanied by a male relative has added to women's daily hardships and restrictions, while further impeding their access to humanitarian assistance and public services like health care.

The Taliban act as a gendered moral authority in Afghanistan, seeking to push women and girls ever further out of public life. This is part of a larger system that Afghan women's rights defenders and United Nations experts have called “[gender apartheid](#).”

Oppression of minority groups

Lesbian, gay, bisexual and transgender (LGBT) Afghans and people who do not conform to rigid gender norms in Afghanistan have faced an increasingly desperate situation and grave threats to their safety and lives under the Taliban. Human Rights Watch has [documented](#) attacks on LGBT Afghans following the Taliban takeover. People have reported being attacked, sexually assaulted, or directly threatened by members of the Taliban because of their sexual orientation or gender identity. Taliban officials have carried out acts of violence against LGBT people with impunity.

The Taliban are also failing to protect Afghanistan's religious minorities from violence. The Taliban follow an ultra-conservative Sunni interpretation of Islam. Yet approximately 10 to 15 percent of Afghans are Shia, and there are a significant number of Sufi, small numbers of Ahmadis, and some Hindus and Sikhs. The Taliban have not stated that Shia or Sufi practices are forbidden. However, they do not consider Ahmadis to be Muslims, and in the past, they have persecuted some of their leaders. Most of Afghanistan's population of non-Muslims also live under threat of persecution, in particular Bahai, Buddhists, Zoroastrians, and Christians, many of whom practice their faith secretly or have gone into hiding. Taliban authorities view anyone who has left Islam as having committed apostasy, a crime they believe should be punished by death.

General oppression

The Taliban have carried out arbitrary arrest and detentions, torture, and ill-treatment of former government officials and security personnel. They have also carried out revenge killings and enforced disappearances of former security force personnel. [In a report](#) published in August 2023, the United Nations Assistance Mission in Afghanistan (UNAMA) documented 218 extrajudicial killings, 14 enforced disappearances, and over 144 cases of torture and mistreatment of detainees since August 2021. UNAMA also documented the systematic torture of detainees, particularly by the Taliban's intelligence agency, the General Directorate of Intelligence (GDI), with methods including waterboarding. UNAMA [reported](#) public floggings of at least 34 men, 8 women, and 2 boys for drug offenses, gambling, and so-called moral crimes since August 2021. UNAMA also received reports that individuals who were forced to return to Afghanistan from Pakistan were [subjected to torture, mistreatment, and other forms of harm](#). Taliban authorities have [carried out](#) corporal punishment, including public floggings.

Undermining good governance and the rule of law

Media freedom has declined throughout Afghanistan over the past four years under Taliban rule. News outlets report that the Taliban intelligence agency monitors all content and the "morality police" ensure adherence by staff to prescribed dress codes and other regulations.

Shortly after August 2021, the Taliban Media and Information Center announced "[11 rules](#)" for media, which include prohibitions on broadcasting or publishing anything "contrary to Islam," "insulting national figures," or "violating privacy." Journalists are required to ensure "balanced" reporting and "only publish the truth," but the rules provide no criteria for interpreting the terms. The open-ended wording allows for arbitrary interventions by officials at all levels.

Local officials enforce official rules arbitrarily, leading to varying degrees of censorship across provinces. The Taliban's media restrictions have been particularly devastating for women journalists outside the capital, who typically have had an even greater struggle than their urban counterparts to establish their careers in media in the face of sexism and security risks. Since

the Taliban takeover, most women working in media have lost their jobs, and in some provinces, there are no longer any women journalists.

Reporters whom the Taliban accuse of working with media in exile or having contacts with opposition groups face detention, severe beatings, and death threats. Many media workers who fled Afghanistan to other countries have been living precarious lives in exile in fear of being forcibly returned to Afghanistan and facing persecution.

Conclusion

Human Rights Watch supports the proposed amendments to the Autonomous Sanctions Regulations 2011 (Cth).