



## SNAPSHOT

# IRAN SANCTIONS FRAMEWORK

### Why are sanctions imposed?

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.

On 28 August 2025, France, Germany and the UK triggered the 'snapback' of the UNSC's sanctions on the basis that Iran had not complied with its obligations under the JCPOA.

On 28 September 2025, the UNSC sanctions that has been eased under resolution 2231 and the JCPOA were automatically reimposed by the UNSC. The measures include:

- import and export bans on nuclear and ballistic missile related goods to and from Iran;
- prohibitions on providing certain services (including bunkering services) to Iran;
- prohibition on allowing Iranian nationals and entities investing in sensitive commercial activities; and
- asset freezes on individuals and entities.

Australia implements the UNSC sanctions by incorporating them into Australian sanctions laws. In addition, Australia imposes autonomous sanctions in relation to Iran.

### What is prohibited by the Iran sanctions framework?

The Iran sanctions framework imposes the following sanctions measures:

Measure	UNSC	Autonomous
restrictions on the export or supply of certain goods	✓	✓
restrictions on the import, purchase or transport of certain goods	✓	-
restrictions on certain commercial activities	✓	-
restrictions on transferring technology or technical assistance	✓	-
restrictions on the provision of certain services	✓	✓
restrictions on providing assets to designated persons or entities	✓	✓
restrictions on dealing with the assets of designated persons or entities	✓	✓
restrictions on conducting business with specified entities	✓	-
travel bans on listed persons	✓	✓



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### Arms or related matériel

Arms or related matériel (as referred to below) includes, but is not limited to, weapons, ammunition, military vehicles and equipment, and spare parts and accessories for any of those things. It also includes paramilitary equipment. While each case will be considered individually, goods on the [Defence and Strategic Goods List](#) are likely to be considered arms or related matériel. Depending on the context, end user and end use, other goods may also be considered arms or related matériel.

### Restrictions on the export or supply of certain goods

It is prohibited to supply, sell or transfer to Iran (directly or indirectly) any of the following goods:

- arms or related matériel
- certain kinds of graphite, raw metals, semi-finished metals, and software for integrating industrial processes.
- certain items, materials, equipment and technologies that are usable for nuclear weapons
- certain nuclear-related items and technologies that that are ‘dual-use’
- certain items, materials, equipment, goods and technologies related to ballistic missile-related programmes
- goods that, as determined by the UNSC, could contribute to Iran’s enrichment-related reprocessing or heavy water-related activities and the development of nuclear weapons delivery systems.
- certain arms-related goods including battle tanks, armoured combat vehicles, large calibre artillery systems, combat aircraft, attack helicopters, warships, missiles or missile systems as defined for the purpose of the United Nations Register of Conventional Arms, or related matériel.
- goods that Australia has determined would contribute to enrichment-related, reprocessing or heavy water-related activities, the development of nuclear weapon delivery systems. This includes goods that are, or relate to, nuclear materials, chemicals, electronic, sensors and lasers, navigation and avionics.

### Restrictions on the import or purchase of certain goods

It is prohibited to procure from Iran, or from a person or entity in Iran (whether or not they originate in Iran) the following goods:

- certain items, materials, equipment and technologies that are usable for nuclear weapons
- certain nuclear-related items and technologies that that are ‘dual-use’
- certain items, materials, equipment, goods and technologies related to ballistic missile-related programmes
- arms or related matériel

### Restrictions on certain commercial activities

It is prohibited to sell or otherwise make available an interest in a ‘sensitive commercial activity’ to Iran, an Iranian national, an entity incorporated in Iran, an entity controlled by Iran or Iranians, or any person or entity acting on his/her/their behalf.



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A 'sensitive commercial activity' is a commercial activity which involves any of the following:

- uranium mining or production
- the use of certain nuclear materials or technology
- an activity undertaken by Iran related to ballistic missiles capable of delivering nuclear weapons.  
Restrictions on transferring technology or technical assistance

It is prohibited to transfer technology or provide technical assistance in relation to the development of ballistic missile technology.

### **Restrictions on the provision of certain services**

To complement the restrictions on the export/import of goods and on some commercial activities, the provision of services which relate to those sanctioned goods or activities is also restricted.

It is prohibited to provide services (including but not limited to technical, brokering, financial and investment services, and the transfer of financial resources on certain technology) which assist with or relate to the supply, sale, transfer, manufacture, maintenance or use of export sanctioned goods by or for Iran (see 'Restrictions on the export or supply of goods' above)

### **Restrictions on providing bunkering services**

It is prohibited to provide bunkering services to an Iranian vessel.

'Bunkering services' include the provision of fuel and supplies to a vessel, as well as other servicing of the vessel.

### **Restrictions on providing assets to designated persons or entities**

It is prohibited to directly or indirectly make an asset available to (or for the benefit of) a designated person or entity.

### **Restrictions on dealing with the assets of designated persons or entities (requirement to freeze assets)**

It is prohibited to use or deal with an asset, or allow or facilitate another person to use or deal with an asset owned or controlled by a designated person or entity (the assets are 'frozen' and cannot be used or dealt with). The prohibition on 'dealing' with assets includes using, selling or moving assets.

'An 'asset' includes an asset or property of any kind, whether tangible or intangible, movable or immovable.

Go to the [Consolidated List](#) to search the names of designated persons and entities.

If you become aware that you are holding an asset of a designated person or entity, you are required to freeze (hold) that asset and notify the AFP as soon as possible. [Go to What You Need to Do](#) for more information.

### **Restrictions on conducting business with specified entities**

It is prohibited to conduct business with entities that are specified by the Minister, where such business with the entity would contribute to Iran's proliferation-sensitive nuclear activities or the development of nuclear weapon delivery systems.

### **Travel bans**

Persons declared for travel bans under the Iran autonomous sanctions framework are prohibited from transiting through or entering Australia.

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### Who must comply with sanctions?

Australian sanction laws apply to activities in Australia and to activities undertaken overseas by Australian citizens and Australian-registered bodies corporate. In some circumstances, it may be possible to obtain a permit from the Minister for Foreign Affairs to engage in an activity that would otherwise be prohibited by a sanctions measure. Information on planning an activity and submitting an application for a sanctions permit is available on the DFAT website. It is a serious criminal offence to contravene a sanctions measure (or a condition of a sanctions permit). The penalties include up to ten years in prison and substantial fines.

### Sanctions permits

The Minister for Foreign Affairs may grant a sanctions permit to allow an activity that would otherwise be prohibited under these frameworks provided the activity meets specific criteria.

The table below provides a general guide to relevant criteria. You should seek your own legal advice if you think your proposed activity is affected by sanctions and may meet the criteria for a permit. Go to [Sanctions Permits](#) for information on permits, including how to apply.

Previous permits (including for the provision of sanctioned supply, services or for assets and controlled assets) made under the Charter of the United Nations (Sanctions—Iran) Regulation 2016 may be valid under these regulations.

Measure	Criteria	Reference
Restrictions of the export or supply of certain goods	<b>Autonomous Sanctions:</b>  The Foreign Minister is satisfied that it would be in the national interest to grant a permit.	<a href="#">Regulations 4, 12 and 18 of the Autonomous Sanctions Regulations 2011</a>  <a href="#">Regulation 11 of the Customs (Prohibited Exports) Regulations 1958</a>
	<b>COTUNA:</b>  The Foreign Minister may provide a permit for goods that are 'permissible goods' if certain requirements are met.  The Foreign Minister may provide a permit for goods that are not 'permissible goods' if certain requirements are met.  For <i>permissible goods</i> , see reg 5 of the Charter of the United Nations (Sanctions – Iran) Regulation 2025	<a href="#">Regulations 5,7,8 9,and 10 of the Charter of the United Nations (Sanctions – Iran) Regulation 2025</a>
Restrictions on provision of certain services	<b>Autonomous Sanctions:</b>  The Foreign Minister is satisfied that it would be in the national interest to grant a permit.	<a href="#">Regulations 5, 13 and 18 of the Autonomous Sanctions Regulations 2011</a>
	<b>COTUNA:</b>	<a href="#">Regulations 5, 15, 16 and 17 of the Charter of the</a>

	The Foreign Minister may provide a permit for the provision of sanctioned services if the services relate to ‘permissible goods’ or where certain requirements are met.	<a href="#">United Nations (Sanctions – Iran) Regulation 2025</a>
Restrictions on providing assets to designated persons or entities  and  Restrictions on dealing with the assets of designated persons or entities	<p><b>Autonomous Sanctions:</b></p> <p>The Foreign Minister is satisfied that it would be in the national interest to grant a permit <b>and</b> the activity is a:</p> <ul style="list-style-type: none"> <li>• basic expense dealing;</li> <li>• legally required dealing; or</li> <li>• contractual dealing.</li> </ul>	<p><a href="#">Regulations 6, 14, 15, 18 and 20 of the Autonomous Sanctions regulations 2011</a></p> <p><a href="#">Autonomous Sanctions (Designated Persons and Entities and Declared Persons – Iran) List 2012</a></p>
	<p><b>COTUNA:</b></p> <p>The Foreign Minister may grant a permit authorising a person or entity to make an asset available to a designated person or entity, or to use or deal with a controlled asset, for:</p> <ul style="list-style-type: none"> <li>• a ‘permissible nuclear dealing’; or</li> <li>• a basic expense dealing; or</li> <li>• a legally required dealing; or</li> <li>• a contractual dealing; or</li> <li>• a required payment dealing; or</li> <li>• an extraordinary expense dealing, where certain requirements are met.</li> </ul>	<p><a href="#">Regulations 18, 19, 20, 21 and 22 of the Charter of the United Nations (Sanctions – Iran) Regulation 2025</a></p> <p><a href="#">Regulation 5 Charter of the United Nations (Dealing with Assets) Regulations 2008</a></p>
Restrictions of providing bunkering services	The Minister may grant a permit authorising the provision of bunkering services to an Iranian vessel in certain circumstances.	<a href="#">Regulation 8, 13, 25 and 26 of the Charter of the United Nations (Sanctions – Iran) Regulation 2025</a>
Restrictions on conducting business with specified entities	The Minister may grant a permit authorising a person to conduct business with an individual or entity in certain circumstances.	<a href="#">Regulations 27 and 28 of the Charter of the United Nations (Sanctions – Iran) Regulation 2025</a>

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Restrictions on making available interests in sensitive commercial activities	<b>COTUNA:</b> No permit is available.	For <i>sensitive commercial activity</i> , see reg 23 of the <a href="#">Charter of the United Nations (Sanctions – Iran) Regulation 2025</a>
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### Relevant legislation

The relevant legislation for the Iran sanctions framework includes the following:

- [Charter of the United Nations Act 1945](#)
- [Charter of the United Nations \(Dealing with Assets\) Regulations 2008](#)
- [Charter of the United Nations \(Sanctions – Iran\) Regulation 2025](#)
- [Migration \(United Nations Security Council Resolutions\) Regulations 2007](#)
- [Customs \(Prohibited Exports\) Regulations 1958](#)
- [Customs \(Prohibited Imports\) Regulations 1956](#)
- [Autonomous Sanctions Act 2011](#)
- [Autonomous Sanctions Regulations 2011](#)
- [Autonomous Sanctions \(Export and Import Sanctioned Goods – Iran\) Amendment Specification 2016](#)
- [Autonomous Sanctions \(Designated Persons and Entities and Declared Persons – Iran\) List 2012](#)

### Where can I get more information?

[Australia and sanctions](#) webpage and [Iran](#) webpage. Enquiries can be made to DFAT by emailing [sanctions@dfat.gov.au](mailto:sanctions@dfat.gov.au)

DFAT maintains a [mailing list](#) for people interested in receiving updates on Australian sanctions laws.

**This document provides a summary only of relevant sanctions laws. It should not be relied upon as a substitute for legal advice. It is your responsibility to ensure you do not contravene sanctions law, including by obtaining your own legal advice.**