



GUIDANCE NOTE

Iran sanctions

This note is intended to provide guidance in relation to the reintroduction of sanctions under the United Nations Act 1946 and the United Nations Sanctions (Iran) Regulations 2025.

This note does not constitute legal advice. It is not intended to provide guidance in relation to compliance with: other countries' sanctions regimes relating to Iran, including autonomous sanctions outside the UN framework; or sanctions imposed by New Zealand on Iranian actors under the Russia Sanctions Act. The Ministry of Foreign Affairs and Trade does not accept liability for any loss or damage caused to any person relying on this material.

NOVEMBER 2025



Reintroduction of Iran Sanctions

On 28 August 2025, France, Germany and the UK jointly triggered the “snapback” process under the Joint Comprehensive Plan of Action (the JCPOA or Iran Nuclear Deal), citing Iran’s non-compliance. Accordingly, on 28 September the UN sanctions on Iran that had been in place prior to the JCPOA¹ were automatically reinstated.

As a UN member, New Zealand is bound to implement UN Security Council (UNSC) sanctions and has implemented the Iran sanctions through the United Nations Sanctions (Iran) Regulations 2025 (the Regulations).

The sanctions include a range of prohibitions related to Iranian nuclear and military activities, and an asset freeze for persons and entities designated by the UN. Resolution 1929 also imposes an obligation on states to require their nationals to “exercise vigilance” when doing business with Iran if such business could contribute to Iran’s “proliferation-sensitive” activities, the development of nuclear weapon delivery systems, or violations of the UNSC resolutions imposing sanctions on Iran.

New Zealanders are required to comply fully with the Regulations implementing UNSC sanctions. Given the wide scope of the Regulations, and the penalties for non-compliance, **it is recommended that anyone contemplating doing business with Iran obtain independent legal advice** before engaging in business with people in Iran, or with entities that are incorporated in Iran or subject to its jurisdiction.

What is the aim of these sanctions?

The UNSC imposed these sanctions to exert pressure on the Government of Iran to change its course of action and to encourage a return to compliance with its nuclear commitments. New Zealand shares the concerns of the UNSC and holds long-standing concerns with the trajectory of Iran’s nuclear programme. Previous reports by the International Atomic Energy Agency (IAEA) Director-General have presented a deeply troubling picture of Iran’s non-compliance, including unjustifiable levels of enrichment activity.

Ensuring domestic compliance with the UNSC sanctions is essential, both: to avoid New Zealand being used as a soft route for sanctions evasion that would undermine international efforts; and to maintain New Zealand’s international reputation.

We expect New Zealanders to maintain vigilant compliance practices, in order: to support New Zealand’s sanctions efforts; and to protect themselves from legal and reputational risks.

Overview of Iran Sanctions Regulations

The New Zealand Regulations introduce a range of restrictions and obligations on New Zealand persons (see definition below) and entities including:

- **Prohibitions on certain dealings** related to designated persons;
- **A duty to exercise vigilance** when doing business with entities incorporated in Iran or subject to its jurisdiction;
- **A compulsory business registration scheme;**

¹ These sanctions are set out in UN Security Council (UNSC) resolutions 1737 (2006), 1747 (2007), 1803 (2008) and 1929 (2010).

- **A requirement to keep business records for at least seven years;**
- **Import, export and procurement bans** relating to nuclear weapon, missile or enrichment-related goods, or to arms;
- A prohibition on providing certain types of **assistance** to Iran, including technical or financial assistance relating to certain military equipment, transfer of ballistic missile-related technology, and providing bunkering services to certain Iranian vessels.

Definitions

“New Zealand person” means a person who is in New Zealand, or a New Zealand citizen (whether or not they’re in New Zealand)

“Restricted Entities” means:

- A person in Iran;
- An Iranian entity; or
- Any person or entity acting on behalf of, or at the direction of, or owned or controlled by, an Iranian entity.

“Doing business” means being in any way involved (even if not for reward) in any provision or receipt of any goods or services.

“Designated person” means individuals or entities designated under the four UNSC resolutions that impose sanctions on Iran. The names and details of sanctioned individuals and entities can be found in the [UN Consolidated List](#).

Duty to exercise vigilance

Regulation 22 requires New Zealand persons and entities to “exercise vigilance” when doing business with Restricted Entities in certain circumstances.

An important component of exercising vigilance is conducting due diligence with regard to your business partners and customers, including identifying ownership and control structures which may not be immediately apparent.

Further information on appropriate due diligence is provided at the bottom of this Guidance Note.

Compulsory Registration

New Zealand’s compulsory registration scheme is designed to ensure that legitimate trade with Iran may continue, and that those engaging in such trade exercise the necessary degree of vigilance.

Regulation 23 requires New Zealand persons and entities intending to do business with a Restricted Entity to first register with the Ministry of Foreign Affairs and Trade. As part of this registration, they are required to confirm, by statutory declaration, that the business will not contribute to violations of the relevant UNSC

resolutions. Registrations may be revoked, including where the registration application was false or misleading.

Provision or receipt of goods that are all or part of a consignment with a total Customs value of \$1,000 or less will not require registration. However, the obligation to exercise vigilance continues to apply.

Registration form

In order to register with the Ministry of Foreign Affairs and Trade, you must complete the [registration form \(available here\)](#) and email it to sanctions@mfat.govt.nz.

The form requires you to supply a range of information about your Iranian business partner(s), any intermediaries and the nature of your business. You must also describe in detail the due diligence measures you've taken to ensure your trade with Iran will not contravene the Regulations. More information is available below.

Supporting documentation is required, evidencing the due diligence. Any documents that are not in English must be accompanied by an English translation completed by a professional translator. Evidence may include:

- Articles of Association
- Official Gazette Notice of Establishment (issued by the Registry Department for Companies and Non-Commercial Institutes)
- Amendment Notice of Change (e.g. address or name change)
- Commercial ID (issued by the Iran Chamber of Commerce, Industries and Mines – this typically includes the company name and Managing Director, but not the names of directors or shareholders).

The regulations require a statutory declaration. This means you must print the form and have your signature witnessed by a Justice of the Peace, lawyer or notary public. The form can then be scanned and emailed to sanctions@mfat.govt.nz.

You can submit your application at any time, but applications cannot be decided until 1 February 2026. No fees will apply to registration.

Duty to report any changes

If there is any change to the identity of the entities with which the business is to be done, or the general nature of that business, this must be reported to the Secretary of the Ministry of Foreign Affairs and Trade.

To report a new business partner, please submit a registration form (available here) including evidence of the due diligence you have undertaken in relation to the new partner to sanctions@mfat.govt.nz.

Other changes can be reported via email to sanctions@mfat.govt.nz. Changes that must be reported include:

- Change in the nature of the business being done with the business partner (e.g. change to the types of goods or services being exchanged)
- Change in ownership structure (e.g. who owns or controls the business)
- Change in intermediaries (e.g. distributors in third countries)

Compulsory Record-Keeping

Registered persons and entities must create records of each instance of the business being done, and keep these records for at least seven years.

Restrictions on dealings related to designated persons

The restrictions in Regulations 27 and 28 relate to “designated person” (see definition above).

Pursuant to Regulation 27, a person must not knowingly deal with² any asset, money or security that is owned or controlled (directly or indirectly) by:

- A designated person; or
- Any person or entity acting on behalf of, or at the direction of, or owned or controlled by a designated person.

Regulation 28 prohibits the sending of funds to designated persons. This includes direct or indirect transfers of assets, money or securities, to or for the benefit of designated persons, or to persons associated with them.

There are some limited exceptions to these prohibitions which are listed in Regulation 29. This includes an exception where the prohibited action is necessary to ensure timely delivery of humanitarian assistance, or to support other activities that support basic human needs. It is also possible to apply for a Ministerial consent for a prohibited dealing. For further guidance on applying for a consent, please email the Sanctions Unit at sanctions@mfat.govt.nz.

Due diligence guidance

Due diligence is the process that you should undertake to support your compliance with the Regulations before entering into a business relationship or transaction, and to avoid supporting attempts at sanctions evasion. You will need to check whether or not your business partner is a sanctioned person, understand the ownership and ownership structures of your business partner and identify any links or affiliations to the Islamic Revolutionary Guard (IRGC), Islamic Republic of Iran Shipping Lines (IRISL), Iranian Government or Iranian Military.

There is no one-size-fits-all model for due diligence. The reasonable due diligence effort undertaken by your business should be appropriate to the level of sanctions risk you face in the circumstances.

As a starting point, you should obtain and verify the identity of your customer and business partners, and then check whether they are named on the [UN Consolidated List](#). The List contains the details and basic identifying information of all listed sanctioned individuals and entities.

To avoid the risk of false negatives, you should look for an exact or close name match and use other identifying information to support your review, including date of birth or job title. Variations in the spelling of names can arise for many reasons.

² This includes transferring, paying for, selling, assigning and disposing of.

For financial institutions, conducting transaction due diligence is important in order to help you understand your overseas customer, including to identify who is the ultimate end-user or provider of the goods or services, and where they are based. Other due diligence steps you could take include:

- Carrying out a basic internet search, including relevant media articles.
- Checking company accountability reports, like annual reports and prospectuses, for names of senior managers and board members.
- Considering using a commercial sanctions screening service.
- Asking your customer for self-declarations of ownership details and organisational structures.
- Staying alert for any red flags relating to your usual business that may help you spot attempts at sanctions evasion. These will vary depending on the type of activities your business undertakes, who your customers are, and how much international exposure you have.

Other factors to consider

New Zealand businesses should also ensure that their business does not contravene **other countries' 'autonomous' sanctions regimes**. Some countries, such as the United States, United Kingdom, Australia and European Union have imposed additional, unilateral sanctions on Iran. New Zealand businesses trading with Iran are advised to seek independent legal advice to ensure that their business does not run into problems through contravention of other sanctions regimes.

A number of Iranian individuals and entities have been sanctioned under the **Russia Sanctions Act** in connection with support for Russia's war in Ukraine. The Act prohibits New Zealand individuals and entities from having dealings with sanctioned persons, assets, services and securities. More information on the Russia Sanctions Act is available [here](#).

Exporters to Iran must also comply with New Zealand's **Export Controls** regime. This regime prohibits the export of military, dual use and catch-all goods which may harm New Zealand's security or national interests. More information is available [here](#).

The reimposition of UNSC sanctions may add to existing **practical challenges** faced by New Zealanders seeking to do business in Iran, for example in the area of banking. Prior to making any commitments, New Zealanders are advised to consult their banks to confirm comfort levels with facilitating Iran-related financial transactions.



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