

Proactive Release

Published on or before: 25 November 2025

The following Cabinet papers and related Cabinet minutes have been proactively released by the Minister of Foreign Affairs

Title	Reference
<i>Report of the Cabinet Legislation Committee: Period Ended 10 October 2025</i>	CAB-25-MIN-0354
<i>Cabinet Legislation Committee – Minute of Decision – United Nations Sanctions (Iran) Regulations 2025</i>	LEG-25-MIN-0200
<i>United Nations Sanctions (Iran) Regulations 2025</i>	



Cabinet

Minute of Decision

This document contains information for the New Zealand Cabinet. It must be treated in confidence and handled in accordance with any security classification, or other endorsement. The information can only be released, including under the Official Information Act 1982, by persons with the appropriate authority.

Report of the Cabinet Legislation Committee: Period Ended 10 October 2025

On 13 October 2025, Cabinet made the following decisions on the work of the Cabinet Legislation Committee for the period ended 10 October 2025:

LEG-25-MIN-0200

United Nations Sanctions (Iran) Regulations 2025

CONFIRMED

Portfolio: Foreign Affairs

Proactively released by the Minister of Foreign Affairs

Rachel Hayward
Secretary of the Cabinet

Proactively released by the Minister of Foreign Affairs



Cabinet Legislation Committee

Minute of Decision

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United Nations Sanctions (Iran) Regulations 2025

Portfolio Foreign Affairs

On 9 October 2025, the Cabinet Legislation Committee:

- 1 **noted** that, consistent with United Nations Security Council Resolution 2231 (2015), the sanctions relating to Iran set out in Security Council Resolutions 1737 (2006), 1747 (2007), 1803 (2008) and 1929 (2010) were reinstated on 28 September 2025;
- 2 **noted** that in 2022, the United Nations Security Council adopted Resolution 2664 (2022), which requires states to include a humanitarian exemption for all asset freeze sanctions;
- 3 **noted** that New Zealand is legally obliged under the United Nations Charter to give effect in domestic law to decisions of the United Nations Security Council;
- 4 **noted** that the relevant statutory test as set out in section 2(1) of the United Nations Act 1946 is met: the United Nations Security Council has directed United Nations member states to implement these sanctions, and New Zealand is required to apply them effectively through regulation;
- 5 **noted** that the United Nations Sanctions (Iran) Regulations 2025 (the Regulations) implement Resolutions 1737 (2006), 1747 (2007), 1803 (2008), 1929 (2010) and 2664 (2022) in New Zealand domestic law;
- 6 **noted** that a waiver of the 28-day rule is sought:
 - 6.1 so that the Regulations can enter into force on 18 October 2025;
 - 6.2 in order to ensure compliance with New Zealand's international obligations to implement United Nations sanctions;
- 7 **agreed** to waive the 28-day rule so that the Regulations can come into force on 18 October 2025;
- 8 **authorised** the submission to the Executive Council of the United Nations Sanctions (Iran) Regulations 2025 [PCO 28272/7.0].

Tom Kelly
Committee Secretary

Attendance: (See over)

Present:

Rt Hon Winston Peters
Hon Judith Collins KC (Chair)
Hon Todd McClay
Hon James Meager
Stuart Smith, MP
Jamie Arbuckle, MP

Officials present from:

Officials Committee for LEG
Office of the Leader of the House
Office of the Attorney-General

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Office of the Minister of Foreign Affairs
Chair, Cabinet Legislation Committee

UNITED NATIONS SANCTIONS (IRAN) REGULATIONS 2025

Proposal

- 1 This paper seeks authorisation for submission to the Executive Council of the United Nations Sanctions (Iran) Regulations 2025 (the proposed regulations).

Policy

- 2 In 2015, the United Nations Security Council (UNSC) adopted Resolution 2231, which endorsed the Joint Comprehensive Plan of Action (the JCPOA) also known as the Iran Nuclear Deal.
- 3 Under the JCPOA, Iran agreed to limit its nuclear programme in return for sanctions relief. However, if any other party were to consider that Iran was not meeting its JCPOA obligations, it could trigger a “snapback” process. This would, after 30 days, automatically reinstate the pre-JCPOA UNSC sanctions, unless the Security Council decided otherwise.
- 4 New Zealand implemented Resolution 2231 through the United Nations (Iran – Joint Comprehensive Plan of Action) Regulations 2016.
- 5 On 28 August 2025, France, Germany and the UK jointly triggered the “snapback” mechanism. Accordingly, 30 days later, on 28 September 2025 pre-JCPOA sanctions on Iran, as set out in UNSC Resolutions 1737 (2006), 1747 (2007), 1803 (2008) and 1929 (2010), were reinstated.
- 6 New Zealand is required under Article 41 of the Charter of the United Nations (UN) to give effect in our domestic law to decisions of the UNSC. The United Nations Act 1946 empowers the Governor-General to make regulations to give effect to such obligations. Regulations may be made where it appears necessary or expedient to enable UNSC resolutions to be effectively applied. I consider that the statutory test is met in respect of the proposed regulations.
- 7 The proposed regulations implement in New Zealand law the decisions of the UNSC set out in Resolutions 1737 (2006), 1747 (2007), 1803 (2008) and 1929 (2010). These sanctions are intended to increase pressure on institutions connected to Iran’s nuclear programme, in order to press Iran toward compliance with its nuclear non-proliferation obligations. They also implement UNSC Resolution 2664 (2022), which requires states to include a “humanitarian exemption” for all asset freeze sanctions, to minimise the risk that such sanctions have adverse humanitarian consequences for civilians.

- 8 The proposed regulations will impose the following restrictions against Iran:
- 8.1 **Import, export and procurement bans** relating to nuclear weapon, missile or enrichment-related goods, and to arms;
 - 8.2 A **prohibition on Iranian investment** involving uranium mining, nuclear materials or technology;
 - 8.3 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;
 - 8.4 An **asset freeze** for persons/entities designated by the UNSC, and those acting on their behalf, along with the required humanitarian exception;
 - 8.5 A **travel ban** for persons designated by the UNSC; and
 - 8.6 A duty to **exercise vigilance when doing business with entities incorporated in Iran or subject to its jurisdiction**. New Zealand will implement this duty as it did prior to the JCPOA taking effect. Namely, all New Zealand persons and entities intending to do business with Iran will first need to register and confirm that the business will not contribute to violations of the relevant UNSC resolutions. The registration system will be managed by the Ministry of Foreign Affairs and Trade. No fees will apply to registration.
- 9 The proposed regulations are routine and do not require any new policy decisions, as policy space already has been given to implement obligatory decisions of the UNSC. The proposed regulations are based on the United Nations Sanction (Iran) Regulations 2010, which prior to the JCPOA implemented in New Zealand the same four UNSC Resolutions (1737 (2006), 1747 (2007), 1803 (2008) and 1929 (2010)).

Timing and 28-day rule

- 10 A waiver of the 28-day rule is sought as the proposed regulations are proposed to enter into force on 18 October 2025. The United Nations (Iran – Joint Comprehensive Plan of Action) Regulations 2016, which are now outdated, are due to automatically expire on that date.¹ Aligning the entry into force of the proposed regulations with the expiry of the 2016 regulations ensures compliance with New Zealand's international obligations to implement UN sanctions on Iran by avoiding any gap in our regulatory framework.
- 11 While it is intended that the proposed regulations enter into force on 18 October 2025, the business registration provisions would come into effect on 1 February 2026 (as set out in proposed regulation 2(2)). This is to allow sufficient time to conduct outreach to affected businesses, and to re-establish and test the business registration scheme. A similar deferral was adopted in the introduction of the Iran sanctions regulations in 2010. All other elements of the regulatory regime would enter into force on 18 October.

¹ Regulation 3(3), United Nations (Iran – Joint Comprehensive Plan of Action) Regulations 2016.

Compliance

- 12 The proposed regulations are proposed to be made under section 2(1) of the United Nations Act 1946.
- 13 The proposed regulations comply with each of the following:
 - 13.1 the principles of the Treaty of Waitangi;
 - 13.2 the rights and freedoms contained in the New Zealand Bill of Rights Act 1990 or the Human Rights Act 1993;
 - 13.3 the principles and guidelines set out in the Privacy Act 2020;
 - 13.4 relevant international standards and obligations; and
 - 13.5 the Legislation Guidelines (2021 edition), which are maintained by the Legislation Design and Advisory Committee.

Regulations Review Committee

- 14 There are no grounds for the Regulations Review Committee to draw the proposed regulations to the attention of the House of Representatives under Standing Order 327.

Certification by Parliamentary Counsel

- 15 The Parliamentary Counsel Office (PCO) has certified the proposed regulations as being in order for submission to Cabinet.

Impact Analysis

- 16 I have authorised drafting of the proposed regulations on the basis that these are necessary to comply with existing international obligations that are binding on New Zealand. The Ministry for Regulation advises therefore that Cabinet's impact analysis requirements do not apply.

Publicity

- 17 The proposed regulations will be notified in the *New Zealand Gazette*, published on the New Zealand legislation website, and publicised on the websites of the Ministry of Foreign Affairs and Trade and other relevant government agencies. There is a programme of outreach to New Zealand stakeholders planned, to support awareness and effective compliance.

Proactive release

- 18 I intend to proactively release this paper once the proposed regulations have been made, subject to any redactions that may be appropriate under the Official Information Act.

Consultation

- 19 The Ministry of Foreign Affairs and Trade has consulted the following agencies in developing the proposed regulations: Parliamentary Counsel Office, New Zealand Customs Service, Ministry of Business, Innovation and Employment, New Zealand Police, New Zealand Defence Force, Ministry of Transport, Maritime New Zealand, the Reserve Bank, the Financial Markets Authority, Ministry of Justice, The Treasury, and Land Information New Zealand.

Recommendations

- 20 I recommend that the Cabinet Legislation Committee:
- 1 note that, consistent with United Nations Security Council Resolution 2231 (2015), the sanctions relating to Iran set out in Security Council Resolutions 1737 (2006), 1747 (2007), 1803 (2008) and 1929 (2010) were reinstated on 28 September 2025;
 - 2 note that in 2022 the United Nations Security Council adopted Resolution 2664 (2022), which requires states to include a humanitarian exemption for all asset freeze sanctions;
 - 3 note that New Zealand is legally obliged under the United Nations Charter to give effect in domestic law to decisions of the United Nations Security Council;
 - 4 note that the relevant statutory test as set out in section 2(1) of the United Nations Act 1946 is met: the United Nations Security Council has directed United Nations member states to implement these sanctions, and New Zealand is required to apply them effectively through regulation;
 - 5 note that the proposed United Nations Sanctions (Iran) Regulations 2025 implement Resolutions 1737 (2006), 1747 (2007), 1803 (2008), 1929 (2010) and 2664 (2022) in New Zealand domestic law;
 - 6 note that a waiver of the 28-day rule is sought:
 - 6.1 so that the United Nations Sanctions (Iran) Regulations 2025 can enter into force on 18 October 2025;
 - 6.2 in order to ensure compliance with New Zealand's international obligations to implement United Nations sanctions;
 - 7 agree to waive the 28-day rule so that the United Nations Sanctions (Iran) Regulations 2025 can come into force on 18 October 2025; and
 - 8 authorise the submission to the Executive Council of the United Nations Sanctions (Iran) Regulations 2025.

Authorised for lodgement

Rt Hon Winston Peters

Minister of Foreign Affairs

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