



NEW ZEALAND
FOREIGN AFFAIRS & TRADE
Manatū Aotearoa



29 January 2026

Minister of Foreign Affairs

For approval by

5 February 2026

Iran protests: Additional Measures on IRGC and Ministerial individuals

BRIEFING Decision Submission

PURPOSE To seek approval to impose additional measures against those involved in Iran's violent suppression of recent protests and ^{s6(a)}

Recommended referrals

Prime Minister	For information by	13 February 2026
Associate Minister of Foreign Affairs	For information by	13 February 2026
Minister of Immigration	For information by	13 February 2026

Contact details

NAME ^{s9(2)(g)(ii)}	ROLE	DIVISION	WORK PHONE ^{s9(2)(a)}
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Iran protests: New Zealand's policy response

Key points

- Iran experienced large-scale protests over the past month. The Iranian Government responded with a violent crackdown and an internet blackout. The protests have now been mostly repressed, but underlying disillusionment with the regime persists.
- The situation in Iran sits against a backdrop of extreme tension with the US and Israel. Possible scenarios include: a continuation of the current situation – peaceful but on the verge of military action; a return to diplomatic dialogue; or US and/or Israeli military action in Iran.
- Military action, if it occurs, could either be at scale (focused on regime change), or more limited to achieve specific security goals and/or force the regime to accept a baseline for negotiations. President Trump has also indicated he wants to respond to the repression of protestors, although – a stay of executions may provide an off-ramp on that issue.
- In the context of this uncertainty, New Zealand's close partners are responding to Iran's actions. On 29 January the EU announced measures targeting individual Iranian Ministers and members of the IRGC. This list includes and members of the Islamic Revolutionary Guard Corps (IRGC) who used lethal force against the protestors.
- In addition, the EU has also announced that it will designate the IRGC (in its entirety) as a terrorist organisation.
- s6(a) officials recommend that New Zealand impose a further set of measures against key Iranian individuals. While New Zealand already has a strong stance on Iran's human rights record and malign activity, adopting additional measures together with partners would amplify our longstanding concerns. We recommend three actions:
 1. Impose travel bans on perpetrators of human rights abuses alongside the UK, Australia, the EU and Canada's sanctions announcements. We also recommend imposing travel bans on individuals connected with s6(a)
 2. Continue registering our concerns through political and diplomatic channels.
 3. s9(2)(g)(i)
- The proposed policy options can be implemented from within existing baselines. A reprioritisation of work is not required and there are no resource implications.
- If military action occurs in or against Iran before these options can be pursued, officials will revert with further advice.

s9(2)(g)(ii)

for Secretary of Foreign Affairs and Trade

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Recommendations

It is recommended that you:

- 1 **Agree** to impose travel bans on individuals who have perpetrated human rights abuses in Iran, and individuals ^{s6(a)} ; Yes / No *
 A list of names will be provided in a following submission after consultation with the UK, the EU, Australia, and Canada.
- 2 **Agree** to continue registering New Zealand's concerns about Iran's human rights abuses and malign activity through political and diplomatic channels. Yes / No
- 3 **Note** officials will provide further advice on funding options for Yes / No
 s9(2)(g)(i)
- 4 **Note** officials will revert with further advice if military action occurs in or against Iran before these policy measures can be pursued. Yes / No
- 5 **Note** there are no resourcing implications. Yes / No
- 6 **Refer** a copy of this submission to the Prime Minister, the Associate Minister of Foreign Affairs, and the Minister of Immigration. Yes / No

Winston Peters

Rt Hon Winston Peters
 Minister of Foreign Affairs

Date: 4.2.26

* NB: MFA is not ready to decide that we should instigate travel bans. He wishes to await the dedicated submission on this before making a call on that.

Iran protests: New Zealand's policy response Report

Overview of recent developments in Iran

1. On 28 December 2025, protests broke out in Tehran's Grand Bazaar. The immediate driver was economic concerns, including the collapse of the Iranian currency (the rial). This occurred against a backdrop of broader dissatisfaction with the Iranian Government, s6(a)
2. Protests quickly spread to all 31 provinces and evolved into a broad anti-government movement. They differed from earlier waves of unrest in that there was participation from a broad cross-section of society; the geographic spread was unprecedented; and the domestic pressure came at a time when Iran was preparing for possible external conflict.
3. The Iranian Government responded with a crackdown. An internet and phone blackout was imposed. Security forces, including the Islamic Revolutionary Guard Corps (IRGC), used extreme force against the protestors. The official death toll is 3,117, with credible reports suggesting the actual toll is likely closer to 17,000 – the highest in Iran since the 1979 revolution. More than 41,000 arrests have been reported by activist groups. The Iranian authorities have blamed the violence on 'terrorists' and foreign interference and warned detainees they will face expedited trials and the death penalty.
4. The protests triggered sharp international criticism. US military intervention appeared imminent, s6(d)
) s6(a)
s6(b)(i) s6(a)
s6(a)

What might happen next

5. Large-scale protests have now largely subsided in Iran, under the weight of the repression. While the protests were domestically driven, they sit in a wider context of acute tensions between the US/Israel and Iran, and an s6(a) threat of military action.
6. It is highly uncertain what might happen next and whether and when the US (and/or Israel) might act. s6(a)
President Trump has also signalled he wants to respond to the violent repression of protestors. s6(a)

7. s6(a)

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s6(a)

Proposals for additional policy actions

8. New Zealand's current policy settings on Iran are restricted, guided by the 2022 framework for bilateral relations, and reconfirmed by you on 23 January 2025. Our overarching goal is to **see Iran abandon destabilising activities and reintegrate into the international community**. New Zealand's approach is to make a targeted and niche contribution to influencing Iranian behaviour, guided by three key pillars: promoting adherence to international law; commitment to non-proliferation and disarmament; and commitment to diplomacy over the use of force. Actions New Zealand has already taken are in **Annex 1**.
9. We propose taking further actions in response to Iran's crackdown on the protests as the response was outside the norms of acceptable state behaviour, including New Zealand's interests on promoting human rights and adherence to the rule of law. More action would amplify New Zealand's longstanding concerns about Iran's human rights record.
10. New Zealand's close partners are responding with a range of policy measures. The US announced new sanctions on 15 January. Overnight (29 January) the European Union announced a package of measures targeting individual Iranian Ministers and members of the IRGC. s6(a), s6(b)(i)
s6(a), s6(b)(i) list includes s6(a), s6(b)(i)
; and members of the Islamic Revolutionary Guard Corps (IRGC) who used lethal force against the protestors.. We have an interest in remaining coordinated with partners, to amplify our messaging and impact.
10. In addition the EU has also announced overnight that it will designate the IRGC (in its entirety) as a terrorist organisation. s6(a)
11. s9(2)(g)(i)

Impose additional travel bans

12. We recommend imposing travel bans on individuals who have perpetrated human rights abuses in Iran. The list include will include IRGC members who used lethal force against protestors, some Iranian Ministers, and other individuals. s6(b)(i)
While these individuals are unlikely to travel to New Zealand, travel bans would have a strong signalling effect, especially if done in coordination with partners.
13. We recommend taking this opportunity to simultaneously impose travel bans on Iranian officials implicated in malign activities s6(a)

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s6(a)

14. We recommend announcing the travel bans package in a press release s9(2)(g)(i) The UK will be doing a press release s6(b)(i) A draft press release is provided in **Annex 2.**
15. If you agree to these travel bans, a list of names will be provided to you in a separate submission. This will be based on s6(b)(i) and cross-checked with open-source research. MFAT will then provide the list of names to Immigration New Zealand, to prevent visas from being granted to the individuals. This will involve amending the immigration instructions to cover travel bans against these individuals. The Ministry will also publish the names on our website, unless partners request that we keep the information confidential.

Register New Zealand's concerns through political and diplomatic channels

16. Officials recommend continuing to register New Zealand's concerns through political and diplomatic channels. New Zealand should:
- Make public statements and participate in joint statements with partners condemning Iran's human rights abuses and malign activity where the opportunity arises.
 - Raise concerns bilaterally with Iran at officials' level. This affords the opportunity to convey New Zealand's positions directly and frankly.
 - Make statements and co-sponsor resolutions in multilateral fora, including at the United Nations Human Rights Council and the International Atomic Energy Agency.

s9(2)(g)(i)

Resourcing

18. The proposed policy options can be pursued within existing baselines and do not require a reprioritisation of work. There are no people implications.

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Annex 1: New Zealand's existing policy measures towards Iran

We have:

- Condemned Iran's malign activities and human rights violations, including restrictions on freedom of expression, political dissent, and the rights of women and minorities. This includes expressing serious concern about the deaths, injuries, and significant arrests resulting from the recent protests.
- Called upon the Iranian security forces to refrain from violence and restore internet access.
- Advocated strongly for human rights in Iran through direct bilateral engagement, in multilateral fora such as the United Nations, and by working closely with international partners.
- Suspended bilateral engagement mechanisms, including the bilateral human rights dialogue and trade promotion.
- Imposed travel bans on 55 Iranians connected to the death of Mahsa Amini in 2022 and the violent response to subsequent protests.
- Instituted 'snapback' sanctions, in line with our obligations under the United Nations Charter. These sanctions include an asset freeze and travel bans for sanctioned persons, import and export bans on certain nuclear and military goods, and a duty on New Zealanders to exercise vigilance in dealing with Iran.¹
- Imposed sanctions on 21 Iranian individuals and 15 Iranian entities who have provided support to Russia's illegal war in Ukraine.
- Removed tariff preferences for Iran as a developing country.
- Not supported Iranian candidates in multilateral elections.

¹ We will also be introducing a compulsory registration scheme for New Zealanders who intend to do business with Iran. This comes into effect on 1 February 2026. The business registration scheme is designed to ensure that legitimate trade with Iran can continue, but that the necessary degree of vigilance is being exercised.

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Annex 2: Draft press release

s9(2)(g)(i)

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