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HUMAN RIGHTS AND ANTI-CORRUPTION SANCTIONS MID-YEAR UPDATE

27 August 2025

This briefing provides an overview of recent developments in the United States' (U.S.), United Kingdom's (UK), European Union's (EU), Canada's, and Australia's use of their targeted human rights and anticorruption sanctions programmes from 1 January 2025 to 30 June 2025.

U.S. UPDATE: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

Between 1 January 2025 and 30 June 2025, the U.S. sanctioned one individual under its Global Magnitsky programme, who was later delisted following the change in administration. The Trump administration also designated the International Criminal Court's (ICC) prosecutor and four ICC judges. Under its Section 7031(c) visa restriction programme, the State Department targeted six government officials involved in human rights violations or corruption and their family members across two countries, and under its Section 212(a)(3)(c) authority, it announced two new visa ban policies, and two follow-up actions under a previously created policy. President Trump also terminated the West Bank and Syria sanctions programs. A more detailed overview of recent U.S. targeted sanctions and visa restrictions focused on human rights abuses and corruption can be found [here](#).

- **Dubious Delisting Under the Global Magnitsky Program:** A senior leader of the Hungarian Prime Minister Viktor Orbán's cabinet, Antal Rogán, was [sanctioned](#) under the Global Magnitsky programme in the final days of the Biden administration, for allegedly orchestrating corruption schemes that enriched himself and loyalists by manipulating public contracts and resources. Following a public lobbying campaign by the Hungarian government, the Trump administration lifted the sanctions against him in April, with Secretary of State Rubio [commenting](#) without explanation that the sanctions were "inconsistent with U.S. foreign policy interests." This marked the first time an individual

sanctioned under the Global Magnitsky program has been granted almost immediate relief without demonstrating any behaviour change or facing some form of accountability.

- **ICC Sanctions Undermine Accountability Efforts:** In February, the Trump administration issued Executive Order 14203 creating a new sanctions program focused on the ICC, in response to the court's scrutiny of alleged Israeli and U.S. involvement in war crimes within the ICC's jurisdiction. During the reporting period, the administration sanctioned the ICC's prosecutor Karim Khan and four judges for their roles in authorising investigations into U.S. personnel in Afghanistan and the issuance of arrest warrants against Israeli Prime Minister Benjamin Netanyahu and former Defense Minister Yoav Gallant. With these designations, the administration has taken more aggressive action against the ICC than similar sanctions imposed against senior court officials in the first Trump administration and threatened accountability efforts more broadly. In May, Human Rights First filed a lawsuit and successfully secured a license from the Treasury Department to protect ICC trial attorney and U.S. Army veteran Eric Iverson from facing possible civil or criminal penalties for sanctions violations relating to his work on the court's Darfur investigation.
- **West Bank Sanctions Termination:** On his first day in office, President Trump terminated the West Bank sanctions program (E.O. 14115), lifting sanctions against all 33 of the individuals and entities that had been designated under it. The sanctions program had been created in February 2024 in response to growing concern over Israeli settler violence against Palestinians in the West Bank in the wake of the 7 October attacks. Many of the sanctions were multilateralised by the UK, Canada, EU, Australia, and other countries. The status of the State Department's 2023 visa restriction policy under Section 212(a)(3)(C) to similarly target individuals involved in undermining peace, security, or stability in the West Bank is unclear.
- **Rollback of Syria Sanctions:** Following the fall of the Assad regime in Syria and marking a significant shift in U.S. policy, the Trump administration terminated the Syria sanctions program through the issuance of Executive Order 14312. The Treasury Department removed more than 500 persons from its sanctions list who had been designated under it, focusing on individuals and entities critical to Syria's development, government operations, and rebuilding. The administration left in place sanctions on Bashar al-Assad and his associates, human rights abusers, and others connected to captagon trafficking, proliferation activities, ISIS and Al-Qa'ida affiliates, and Iran and its proxies. Certain secondary sanctions done under the Caesar Syria Civilian Protection Act of 2019 have been temporarily waived. However, these cannot be formally terminated without congressional action. The Executive Order also established a pathway for the State Department to remove Syria from its State Sponsors of Terrorism list, among other actions.
- **Changing Human Rights and Anticorruption Sanctions Priorities under the Second Trump Administration:** The Trump administration has significantly scaled back efforts to prioritise human rights and anticorruption accountability in its foreign policy and sanctions. These have included broader structural changes, such as gutting the State Department's Bureau of Democracy, Human Rights, and Labor, one of the key bureaus implementing human rights sanctions and visa restrictions, and narrowing its focus to "natural rights" that excludes universally recognized human rights violations impacting women and LGBTQIA+ persons. In furtherance of its "America First" foreign policy, the administration's sanctions and visa restriction priorities have focused primarily on transnational criminal organisations such as drug cartels and their trafficking operations, Iran and groups backed by the Iranian regime, those designated as foreign terrorist organisations, Cuba, and migration.

Access all of Human Rights First's U.S. targeted human rights and anticorruption sanctions and visa restrictions resources [here](#). Access past publications and events [here](#).

UK UPDATE: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

Between 1 January 2025 and 30 June 2025, the UK used its targeted sanctions programmes to respond to the invasion of Ukraine and the conflict in Israel-Gaza, as well as addressing serious human rights violations and corruption in Georgia, Sri Lanka, Belarus, Venezuela, Moldova, and Guatemala. Also, the UK's National Crime Agency (NCA) secured the first convictions for breaches of the UK's Russia sanctions. In total, during this period, the UK announced 16 targeted sanctions packages, designating 120 entities, 119 individuals, and 179 ships – including 17 and 13 designations under the Global Human Rights and Global Anti-corruption programmes, respectively.

- **Major Packages Targeting Russian War Machine:** The UK government announced eight sanctions packages targeting Russia's war economy, particularly political elites and Kleptocrats, military supply chains, sanctions evasion networks, and overseas enablers. The UK's Foreign, Commonwealth & Development Office (FCDO) published an analysis estimating that as of February 2025, global sanctions have deprived the Russian state of at least \$450 billion since Russia invaded Ukraine. By [one estimate](#), this is equivalent to around two more years of funding for the invasion.

Key designations during the reporting period are set out below. A more detailed update of recent UK sanctions developments relating to Russia and Ukraine can be found [here](#).

- [Sanctioning two Russian oil giants](#), alongside the U.S (10 January). At the time, these companies produced over 1 million barrels of oil per day between them – worth roughly \$23 billion a year.
- Implementing the [largest UK sanctions package against Russia since 2022](#), targeting 107 individuals, entities, and ships (24 February). This included using new powers to target foreign financial institutions, sanctioning 'new kleptocrats' fronting up strategic sectors of Russia's economy, and designating North Korean generals and senior officials complicit in deploying over 11,000 North Korean forces to Russia.
- [Tightening sanctions on Putin's shadow fleet](#), targeting a total of 179 vessels, as well as marine insurance providers facilitating the fleet's operations (24 February to 17 June). Subsequently, the NCA and G7 partners issued a joint 'Red Alert' advising financial institutions to strengthen their due diligence processes to address this network.
- [Designating two UK residents](#) who allegedly operate a network of shell companies that has funnelled more than \$120 million worth of high-tech electronics to Russia; as well as Russia's Main Directorate of Deep-Sea Research (17 June). Sanctions are making it more costly for Putin's war machine. Russia pays up to six times the price for dual-use items, and the cost of components for the Russian defence sector has risen by 30% over three years compared to global prices.
- **Holding Israeli West Bank Settlers to account:** The UK government announced two sanctions packages responding to ongoing violence against Palestinian communities in the West Bank, first [designating three individuals, two settler outposts, and two organisations](#) allegedly supporting the violence (20 May); and shortly after [sanctioning Israeli government ministers](#) Itamar Ben-Gvir and Bezalel Smotrich – alongside Australia, Canada, New Zealand, and Norway (10 June).

- Maintaining Pressure on Belarus:** As an “immediate response” to the latest widely disputed presidential election in Belarus, on 27 January, the UK imposed sanctions on six individuals and three entities in Belarus – in coordination with Canada. Those sanctioned are Heads of GUBOPiK (one of the main security forces responsible for political persecution in Belarus), as well as companies in the Belarusian defence sector supporting Russia’s war in Ukraine.
- Addressing “Fraudulent” Elections in Venezuela:** On 10 January, the UK government sanctioned 15 individuals associated with Nicolás Maduro’s contested regime in Venezuela – coinciding with Maduro’s swearing in. UK Foreign Secretary David Lammy said that “Nicolás Maduro’s claim to power is fraudulent”, referencing findings made by the UN Panel of Experts and Carter Center. The sanctions target judges and senior officials in Maduro’s regime, and complement similar measures taken by Canada, the U.S., and the EU.
- Targeting destabilising actors in Moldova, Guatemala, and Georgia:** As part of the UK Foreign Secretary’s campaign to tackle corruption and dirty money, the UK government imposed sanctions on 12 individuals and one entity (2 April), targeting: (i) Evrazia, a Russian non-profit used by fugitive oligarch Ilan Shor (designated by the UK on 8 December 2022) to bribe Moldovan citizens to vote “no” in last year’s referendum on joining the EU; (ii) former Guatemalan President Giammattei and his ‘Pacto De Corruptos’ – officials who have allegedly sought to undermine the anti-corruption reforms of President Arévalo by interfering in prosecutions and threatening investigators; and (iii) leaders of the ‘Judicial Clan’ – a group of party-political judges in Georgia who are allegedly abusing their position to influence court rulings and undermine the rule of law for the benefit of the ‘Georgian Dream’ party. Eight days later (10 April), the UK sanctioned a further four Georgian officials, becoming the first state to sanction Georgia’s General Prosecutor, among others, for his alleged role in allowing serious human rights violations in response to protests in Georgia since 2024.
- Advancing Accountability in Sri Lanka:** The UK Government has sanctioned four men implicated in atrocities during the 1983-2009 conflict between the Liberation Tigers of Tamil Eelam and the Sri Lankan government, including extrajudicial killings, torture, and sexual violence (24 March). The UK is a member of the Core Group on Sri Lanka at the UN Human Rights Council and has promoted measures to seek accountability for international crimes committed in the country. A recent report by the UN High Commissioner for Human Rights (8 August) called on Sri Lanka to “break from the past” and develop a comprehensive roadmap to translate its transitional justice commitments into results.
- UK Rolls Back Syria Sanctions:** Following the collapse of the Assad regime in December 2024, the UK government joined the EU and U.S. in lifting asset freezes against various Syrian entities. An initial 24 listings were removed on 6 March, including those against the Central Bank of Syria, Syrian Arab Airlines, and energy companies. On 24 April, the UK lifted sanctions against a further 12 entities, helping to facilitate essential investment and supporting the rebuilding of the country and economy. See here and here for summaries of recent UK, EU, and U.S. easing of Syria sanctions. The UK has, like its partners, retained sanctions against members of the former regime. The government also made amendments to the Syria sanctions programme to ensure it can still hold Assad and his associates accountable, while giving the UK scope to deploy future sanctions “should that become necessary.”
- First Conviction for Russia Sanctions Breaches:** On 11 April, the NCA secured its first UK convictions for breaches of the UK’s Russia sanctions. Dmitrii Ovsianikov, the former Russia-appointed Governor of Sevastopol, was found guilty of circumventing sanctions regulations and money laundering after

receiving £76,000 from his wife and a new Mercedes from his brother. His brother was found guilty of circumventing sanctions regulations, having made economic resources available to Dmitrii. Dmitrii and his brother were sentenced to 40 months and 15 months imprisonment (suspended for 15 months), respectively. In its cross-government review of sanctions implementation and enforcement (15 May), the UK found that robustly tackling failures to comply with sanctions is “paying off”. As of 10 January, Ovsianikov was the only case in which charges were brought. The UK government has committed to implementing several of the review’s recommendations in the forthcoming financial year, including publishing updates on sanctions enforcement actions and disruptions, publishing a government-wide sanctions strategy, and developing an early settlement scheme for civil sanctions cases and a fast-track civil penalty process for certain sanctions breaches.

- **Delisting Challenges Fail:** Two major delisting challenges have been dismissed during the reporting period. On 24 January, the Court of Appeal dismissed an appeal from Anzhelika Khan – a Russian-born British citizen – against her 2022 designation under the Russia sanctions programme, which is based on association with her husband, oligarch German Khan. Following the UK Supreme Court’s seminal judgment in the Shvidler and Dalston Projects Ltd cases (stay tuned for analysis), Khan was refused permission to appeal her case. On 11 February, the High Court dismissed a challenge from Dana Astra, a Belarusian construction company, which had argued that their designation constituted a disproportionate interference with rights under the European Convention on Human Rights and common law, and that it was irrational. Dana Astra has since been granted permission to appeal (expected to be heard by 15 June 2026).
- **Retaliatory sanctions continue:** Russia has imposed sanctions on 15 Members of Parliament and six members of the House of Lords over what it claims were “hostile statements and unfounded accusations” (23 April). The individuals targeted – who have openly called for frozen Russian assets to be seized and repurposed to support Ukraine – are now banned from entering Russia. Days later (25 April), the FCDO warned some of the UK’s top human rights lawyers that they are at risk of being sanctioned by U.S. President Trump and could have their worldwide assets frozen, because of their association with the ICC’s investigation into war crimes in Gaza.
- **Continued Stalemate on Chelsea FC Funds:** A coalition of 138 UK NGO leaders wrote to the UK Prime Minister (27 February) calling for the sale proceeds of Chelsea FC to be made available to communities impacted by the war in Ukraine. The Chelsea FC funds have received significant parliamentary attention so far in 2025, with a Member of Parliament citing REDRESS’ work before the House of Commons. On 2 June, the UK Foreign Secretary and Chancellor of the Exchequer made a joint statement reflecting on their frustration that it has not been possible to reach an agreement on the issue with former owner Roman Abramovich, and threatening to take Abramovich to court if required “to ensure people suffering in Ukraine can benefit from these proceeds as soon as possible”.
- **UK Government’s Sanctions Priorities:** The UK government’s sanctions priorities have remained steady, focusing primarily on Russia-Ukraine, Israel-Gaza, and election interference and corruption around the world. Various reviews of its strategy are ongoing (see REDRESS’ latest written evidence). On 4 February, the Foreign Affairs Committee held an evidence session on the UK’s strategy. Subsequently, the Committee issued a call for evidence, focusing on the parliamentary scrutiny of sanctions. A further session was held on 10 June. Meanwhile, the FCDO invited expressions of interest to conduct a systematic review of evidence on sanctions for conflict and atrocity prevention in low- and middle-income countries (13 February). Looking forward, the UK Foreign Secretary, in his

Locarno speech, introduced the government's new sanctions regime targeting irregular migration and organised immigration crime (Note: The Global Irregular Migration Sanctions Regime is now in effect. 20 individuals and five entities have already been designated).

Access all of REDRESS' UK targeted human rights and anticorruption sanctions and visa restrictions resources [here](#).

EU UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

- **10 listings under EU Global Human Rights Sanctions Regime:** In the first half of 2025, the EU announced ten new sanctions listings under the Global Human Rights Sanctions Regime (EUGHRSR) – all in relation to Syria. The EU sanctioned three entities and two individuals for serious human rights abuses in coastal regions of Syria (28 May), followed by five persons associated with the former Assad regime for supporting crimes against humanity and for fuelling sectarian violence (23 June).
- **Upcoming European Parliament report on EUGHRSR:** The European Parliament is working on an own-initiative report on addressing impunity through EU sanctions, including the EU Global Human Rights Sanctions Regime (so-called 'EU Magnitsky Act'). The report is planned to be adopted before the end of 2025, on the eve of the fifth anniversary of the EUGHRSR.
- **New Iran Human Rights Sanctions:** On 24 April, the EU sanctioned seven individuals and two entities responsible for human rights violations in Iran, including for their roles in the detention of EU citizens in Iran, and those linked to the violent crackdown against the “Women, Life, Freedom” movement.
- **EU adopts several sanctions regimes vis-à-vis Russia:** On 20 May, the EU adopted its 17th package of Russia sanctions. The package targets:
 - Russia's shadow fleet, the energy and military industrial sectors, as well as entities from third countries aiding Russia's war in Ukraine, and listings in relation to looting of cultural heritage in Crimea, and the illegal exploitation of Ukraine's agricultural production.
 - 28 individuals responsible for serious human rights violations, repression of democratic opposition and activities undermining the rule of law in Russia – members of the Russian judiciary (judges, prosecutors, representatives of the Supreme Court of the Russian Federation and regional courts), as well as members of the Investigative Committee involved in the fabrication of cases against various activists.
 - 21 individuals and six entities responsible for destabilising activities abroad, under the EU's new Hybrid Threats sanctions regime.
 - Three Russian entities involved in the development and use of chemical weapons.
- **Georgia:** In view of the deteriorating human rights situation and democratic backsliding in Georgia, the Weimar Triangle (Germany, France and Poland) imposed visa bans against a dozen Georgian officials (names are not known). Similarly, three Baltic States imposed sanctions on several dozen Georgian officials. Estonia has sanctioned 55 individuals, Lithuania has added 74 names to its blacklist, and Latvia has sanctioned 16 individuals.

- **Democratic Republic of Congo:** In March, the EU imposed restrictive measures against nine individuals and one entity responsible for acts that constitute serious human rights violations and abuses in the Democratic Republic of the Congo (DRC) for sustaining the armed conflict, instability and insecurity in the DRC and exploiting the armed conflict through the illicit exploitation or trade of natural resources.
- **EU suspends Syria Sanctions:** On 24 February, the EU decided to ease the EU sanctions framework in certain sectors, with the intention to support an inclusive transition in Syria and aid economic recovery and reconstruction of the country. While sanctions were suspended immediately, the EU reserves the right to re-impose them in the event of deterioration of the situation. Suspension covers broad economic areas, including energy and banking sectors. Meanwhile, the EU maintained listings connected to the Assad regime, the chemical weapons sector, and illicit drug trade, as well as a number of sectoral measures, such as on arms trade, dual-use goods, equipment for internal repression, software for interception and surveillance, and the import/export of Syrian cultural heritage goods.

CANADIAN UPDATE: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

Between 1 January 2025 and 30 June 2025, the Canadian government designated 55 individuals and 13 entities associated with gross and systematic human rights abuses using its targeted sanctions regime. These designations were a response to human rights abuses perpetrated in Venezuela, Belarus, Sudan, Iran, Myanmar, and Haiti. Canada coordinated these actions with international partners to implement at least four rounds of multilateral sanctions. In addition, Canada enacted sanctions triggered by grave breaches of international peace and security, targeting persons from or linked to Russia, Israel, Belarus, and Haiti. All designations during this period were imposed under the Special Economic Measures Act (SEMA). There were no listings under the Justice for Victims of Corrupt Foreign Officials Act (the Sergei Magnitsky Law).

- **Federal Election and Liberal Government Priorities:** After nearly a decade as Prime Minister, Justin Trudeau resigned as leader of the Liberal Party, triggering a Liberal leadership race. Mark Carney secured a landslide victory and was sworn in as Prime Minister on 14 March. Shortly after, Carney dissolved Parliament, prompting a general election that saw the Liberals return to power with a minority government. Parliament reconvened on 26 May under Carney's leadership. Accordingly, the sanctions developments in this period reflect the distinct yet overlapping priorities of two successive Liberal governments. The new government's priorities include redefining a new economic and security relationship with the U.S., strengthening international relationships, and protecting Canadian sovereignty and security.
- **Multilateral Designations Targeting Senior Officials in Venezuela:** The Canadian government imposed two rounds of targeted sanctions on senior Venezuelan officials involved in gross and systematic human rights violations. On 9 January, Canada, in coordination with the U.S., UK, and EU, listed 14 current and former officials who supported efforts by the Maduro regime to silence and intimidate those demanding free and fair elections in Venezuela. On 20 March, Canada designated eight officials for their support of human rights violations and activities that undermine Venezuela's democracy. To date, the Canadian government has designated 27 Venezuelan officials under the SEMA in response to the fraudulent presidential election in 2024. This brings the total number of designations to 143 since 2017 under the SEMA and Sergei Magnitsky Law.

- Sustained Pressure on Lukashenko Regime over Rights Violations and Support of Russia's War on Ukraine:** On 24 January, Canada imposed targeted sanctions on seven individuals and three entities involved in, or associated with, gross and systematic human rights violations in Belarus, stemming from the fraudulent 2020 presidential election. These violations include the unlawful use of force against peaceful protestors, arbitrary detention, wrongful prosecutions, and other abuses. On the same day, Canada listed three individuals and nine entities for producing and supplying military equipment to Russia for its war on Ukraine. All designations were imposed in coordination with the UK. They are part of an ongoing sanctions regime, in place since 2020, associated with the Lukashenko regime's crackdown on anti-government protestors and its support for Russia's war of aggression against Ukraine, which has resulted in 320 designations under the SEMA.
- Renewed Designations in Response to the Ongoing Conflict in Sudan:** In response to the deteriorating situation in Sudan, the Canadian government imposed two packages of targeted sanctions on individuals and entities affiliated with the Sudanese Armed Forces (SAF) and Rapid Support Forces (RSF) for their involvement in gross and systematic violations of human rights and international humanitarian law as well as grave breaches of international peace and security. On 6 February, Canada designated two individuals connected with widespread violence against civilians, including conflict-related sexual violence. Both have leadership roles in the financing and procurement networks of their respective forces. On 5 March, Canada targeted seven individuals and three entities, including the leaders of the SAF and RSF, for their refusal to end the fighting, ongoing attacks against civilians, and involvement in procurement and financing networks. These designations mark a renewed effort by the Canadian government to address the conflict, following an initial round of sanctions imposed in April 2024.
- Updated Seizure Order under Canada's Asset Seizure and Forfeiture Regime:** On 14 February, Canada updated a seizure order originally issued on 8 June 2023 for an Antonov 124 aircraft located at Toronto Pearson International Airport, adding four additional persons with ownership interests. Two entities, sanctioned under Canada's Russia sanctions regime, were named in the original seizure order. This marks the third use of Canada's seizure and forfeiture regime, the first of which was issued on 15 December 2022 concerning the restraint of US\$26 million from Granite Capital Holdings, a company owned or controlled by Roman Abramovich, a Russian oligarch sanctioned under the SEMA.
- General Permit Issued Temporarily Easing Syria Sanctions:** On 27 February, Canada issued a 180-day general permit authorizing specified activities that allow Canadians to support efforts aimed at the democratization or stabilization of Syria, as well as the delivery of humanitarian assistance. The permit was issued to facilitate the stabilization of Syria and a sustainable political transition following the fall of the Assad regime in December 2024.
- Designations Targeting IRGC Procurement and Supply Networks:** On 6 March, Canada imposed targeted sanctions on three individuals and four entities involved in gross human rights violations against Iranian citizens and activities undermining international peace, security, and stability, aligning with measures taken by its allies. The designations target businesspeople and companies associated with procurement and supply networks that support the Islamic Revolutionary Guard Corps' (IRGC) weapons production and sales, fuelling systematic oppression against Iranians and threatening regional and global security. These measures further Canada's longstanding commitment to holding the Iranian regime to account, marking a total of 462 designations since 2010 under the SEMA and Sergei Magnitsky Act.

- Major Amendments to Myanmar Regulations and Designations of Senior Officials:** On 6 March, major amendments to Myanmar's SEMA regulations entered into force, with specific criteria added for human rights and corruption as well as third-country provisions. The amendments allow Canada to impose sanctions more effectively in cases of human rights violations, acts of corruption, and breaches of international peace and security. They also allow Canada to designate any individual or entity, except Canadian nationals and entities located in Canada, for contributing to abuses in Myanmar, thereby extending the scope beyond Myanmar nationals and entities operating within the country. On the same day, Canada imposed targeted sanctions on 13 senior Myanmar government officials as well as three entities in response to gross and systematic human rights violations and grave breaches of international peace and security. Targeted persons include individuals in Myanmar's Ministry of Defense and Armed Forces.
- Multilateral Sanctions of Far-right Israeli Ministers in Response to Extremist Settler Violence:** On 10 June, Canada, alongside the UK, Australia, New Zealand, and Norway, listed two Israeli Cabinet ministers in response to their role in facilitating extremist settler violence, thereby threatening international peace and security. These designations were prompted by their roles in advancing settlement and outpost expansion in the West Bank, shielding perpetrators of settler violence, and promoting a climate conducive to further violence. This marks the fourth round of designations under Canada's Extremist Settler Violence regime. This round follows four packages of terrorist-related sanctions on Hamas and its affiliates for their involvement in the terrorist attacks in Israel on 7 October 2023.
- Sweeping Designations, Regulatory Amendments, and Other Comprehensive Measures to Support Ukraine in Response to Russia's War of Aggression:**
 - Canada imposed four rounds of coordinated sanctions actions, encompassing new designations, regulatory amendments, and other restrictive measures. On 14 February, Canada broadened the scope of who can be sanctioned, adding persons engaged in prohibited conduct in the past, those who indirectly facilitated prohibited conduct, current or former senior officials of entities, and persons who obstruct the work of international organizations in Ukraine. In addition, it designated two foreign subsidiaries or affiliates of a listed Russian company for assisting Russia in evading sanctions.
 - On 21 February, marking the third anniversary of Russia's invasion of Ukraine, Canada designated 76 persons, including third parties outside of Russia, for supporting Russia's military-industrial base, contributing to the unlawful deportation or forced transfer of Ukrainian children, or enabling Russia's information operations capability. Targets also included senior Russian government officials and oligarchs who support Putin's regime, persons responsible for facilitating military cooperation between Russia and North Korea, and entities that have used drones against civilian targets in Ukraine. On the same day, Canada updated its list of Restricted Goods and Technologies to align with previous measures implemented by its allies and listed 109 vessels from Russia's shadow fleet.
 - On 1 March, on the occasion of the Securing our Future Summit in the UK, Canada listed ten individuals and 21 entities associated with Russia's annexation of Crimea and its war of aggression in Ukraine, including paramilitary organizations and their leaders operating in Ukraine and the Kremlin's Africa-network, in an effort to counter the role of third-party organizations and countries in the conflict.
 - In one of its most comprehensive sanctions packages, Canada listed 70 individuals and 33 entities on 13 June, on the occasion of the G7 Leaders' Summit in Canada. Among the numerous designations were financial entities involved in channelling funds to pay for war-related products; persons involved in the development of Russia's quantum sector; government and private-

sector actors supporting the military-industrial complex and disinformation efforts; and persons financially benefiting from the war. Additionally, Canada implemented trade-related sanctions on nearly 1,000 new items and expanded targeting of Russia's shadow fleet by listing an additional 201 vessels. These trade measures included export restrictions on goods linked to the production of chemical and biological weapons, as well as import restrictions on coal, metals, and other revenue-generating imports.

- **First Criminal Prosecution for Violations of Canada's Sanctions on Russia:** On 6 June, the Royal Canadian Mounted Police issued a public statement announcing that Canadian businessman Anton Trofimov had been arrested and charged with sanctions evasion following a three-year investigation. Trofimov faces two charges under the SEMA for exporting banned technology to Russia and one charge under the Criminal Code for possession of property obtained by crime. In May 2023, the U.S. sanctioned Anton Trofimov along with a Canadian-based business, which he owned, and a Hong Kong-based company with which he was affiliated. Multiple jurisdictions, including the UK and the EU, have sanctioned the latter.

AUSTRALIA UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

- **First Cyber Sanctions Against an Entity:** On 12 February, Australia imposed further sanctions in relation to the 2022 cyberattack against Medibank Private, which affected millions of Medibank customers with the exposure of their personal and medical data. This is the first instance of cyber sanctions against an entity by Australia. The sanctions were imposed against a Russian entity, ZServers and five Russian citizens who provided enabling services, including the infrastructure to host and disseminate the stolen Medibank data. The UK and the U.S. also imposed sanctions on these targets, demonstrating a multilateral effort across jurisdictions.
- **Australia's Largest Sanctions Package Against Russia:** On 24 February, marking three years since Russia's unlawful invasion into Ukraine, Australia sanctioned 70 persons and 79 entities – Australia's largest sanctions package since February 2022. These sanctions are directed at those enabling Russia's unlawful administrations in eastern Ukraine and Crimea, including alleged officials, judges, and prosecutors, as well as individuals responsible for conflict-related sexual violence and the forced deportation of Ukrainian children. Additionally, they target persons and entities involved in strengthening military ties between Russia and North Korea, including the reported deployment of North Korean troops to the conflict.
- **Coordinated International Action Against Israeli Ministers:** On 10 June, Australia imposed targeted sanctions under its autonomous human rights thematic regime on Israeli ministers Itamar Ben-Gvir and Bezalel Smotrich for inciting violence against Palestinians in the West Bank – a multilateral action also taken by Canada, New Zealand, Norway and the UK. This significant step follows the ACIJ's detailed submissions of August 2024 and January 2025 to the Australian Foreign Minister, urging her to impose sanctions on these individuals for human rights violations and to take concrete action to address Israel's ongoing international crimes and systematic violence against Palestinians in the unlawfully Occupied Palestinian Territory.
- **Targeting Russia's Shadow Fleet Supporting the War on Ukraine:** On 18 June, the Minister for Foreign Affairs designated 60 vessels as sanctioned vessels for Russia in accordance with regulation 8 of the

Autonomous Sanctions Regulations 2011 (Cth). The effect of these designations allows the Minister to direct a sanctioned vessel to leave Australia; or not enter a particular port or place in Australia. If a vessel contravenes the Minister's direction, it is forfeited to the Commonwealth. The designations were made on the basis that these vessels form part of Russia's shadow fleet, used to circumvent international sanctions and sustain its illegal and immoral war against Ukraine.

- **Recommendations Released from Inquiry into Sanctions Policy:** On 3 July 2024, the Senate referred an inquiry into Australia's sanctions regime to the Foreign Affairs, Defence and Trade Reference Committee for inquiry and report by February 2025. A copy of the report detailing the recommendations made by the Committee can be found [here](#).
- **AUSTRAC Advances Reform of AML/CTF Framework:** On 19 May, Australia's anti-money laundering and counter-terrorism financing regulator, AUSTRAC, released '[the second public consultation on new AML/CTF Rules](#)'. Among the proposed changes are the requirement for reporting entities regulated by AUSTRAC to develop, maintain and comply with policies to ensure that they do not contravene targeted financial sanctions obligations, including asset freezing, in the provision of their designated services.
- **Foreign Minister Removes Russian Oligarch from Sanctions List:** On 19 May, the Minister for Foreign Affairs [delisted](#) Igor Makarov. Makarov was designated under the Russian thematic regime, where a designation in this instance required the Minister to be satisfied that Makarov is engaging in activity that is of economic or strategic significance to Russia. Under Australia's autonomous sanctions regime, the Minister is not required to provide reasons for her decision. The Australian delisting followed a successful delisting challenge in the UK.
- **Federal Court Upholds Sanctions Against Oleg Deripaska:** On 27 March, the Australian Federal Court [dismissed](#) the appeal of Russian oligarch Oleg Deripaska against his sanctions and travel ban.

NEW RESOURCES AND MEDIA FROM THE MAGNITSKY SANCTIONS

COALITION

- **[Recovering UK Assets Linked to Sanctions Violations as Reparation:](#)** REDRESS published a briefing proposing that fines and penalties imposed by the UK's enforcement agencies for violations of sanctions could be used to fund reparation for survivors of serious human rights or humanitarian law violations and serious corruption.
- **[REDRESS Condemns US Sanctions on the ICC: A Setback for Victims' Right to Justice and the Global Fight against Impunity:](#)** REDRESS published a press release strongly condemning U.S. ICC sanctions and calling calls on the EU, its Member States, and ICC States Parties to unequivocally condemn these sanctions and take all measures, including enacting blocking statutes to support the ICC and its allies, as well as victims engaging with the Court.
- **[Global Magnitsky and Related Sanctions Semi-Annual Update:](#)** Human Rights First, REDRESS, Open Society Foundations, Raoul Wallenberg Centre for Human Rights, and the Australian Centre for International Justice published a joint report that highlights major updates in Magnitsky-style sanctions across the United States, UK, EU, Canada, and Australia from 1 July 2024 to 31 December 2024.

- **Human Rights First Calls for Magnitsky Sanctions in Egyptian Bribery of Senator Menendez:** In January, Human Rights First submitted a Global Magnitsky sanctions recommendation to the U.S. government against a senior Egyptian official and U.S. company for their apparent involvement in the bribery of former U.S. Senator Robert Menendez.
- **What's Different About the New ICC Sanctions? Still Appalling, Not Much Narrower:** In a blog, Human Rights First's Adam Keith and Nina Moraitou-Politz identify three key differences between the new executive order on International Criminal Court sanctions and a related House bill.
- **Questions and Answers: U.S. Sanctions on the International Criminal Court:** Human Rights First published a factsheet explaining the ICC-related sanctions imposed by the Trump administration in February 2025.
- **RWCHR and IJC Call for Canadian Sanctions on Iranian Officials:** RWCHR and the Iranian Justice Collective announce the joint filing of a sanctions recommendation to Global Affairs Canada, urging action against ten Iranian individuals implicated in gross and systematic human rights violations.
- **Joint Letter to the UK Minister of State on Magnitsky-style Sanctions:** Human Rights First and REDRESS called on the UK Foreign, Commonwealth and Development Office to increase its independent use of sanctions to credibly respond to human rights abuses and corruption.
- **Comparison Chart: Covered Human Rights Abuses & Corruption in Different Jurisdictions:** Human Rights First published a chart comparing the types of conduct and persons eligible for Magnitsky-style sanctions under the U.S., UK, EU, Canadian, and Australian sanctions frameworks, along with an accompanying [blog](#).
- **Canada Should Sanction Hong Kong Officials for Repression:** RWCHR and the Committee for Freedom in Hong Kong Foundation renew calls for the Canadian government to sanction Hong Kong officials responsible for human rights abuses and transnational repression.
- **The Leahy Laws and Their Relationship with Global Magnitsky Sanctions:** Human Rights First published an explainer on the U.S. Leahy Laws, which restrict security assistance to foreign security forces implicated in gross violations of human rights, and their connection with Global Magnitsky sanctions, along with an accompanying [blog](#).
- **Human Rights First Joins ACLU and NYCLU in Amicus Brief to Protect First Amendment Rights and Interests of NGOs Advocating for U.S. Sanctions:** In an amicus brief filed in U.S. federal court in support of an NGO facing a discovery request related to its sanctions advocacy, Human Rights First, the ACLU, and NYCLU argued that granting such discovery requests would put civil society groups at serious risk of irreparable harm, chill their human rights and anticorruption work, and violate the First Amendment and other protections.
- **Written Evidence Submitted to the UK Foreign Affairs Committee Inquiry into the UK's Sanctions Strategy:** REDRESS provided written evidence to the UK Foreign Affairs Committee, providing recommendations for enhanced parliamentary (or Foreign Affairs Committee) oversight of sanctions designations and on introducing a statutory requirement to report on frozen assets.

- **Trump's Sanctions against ICC Judges are a Direct Assault on Accountability for Victims of International Crimes Worldwide:** Joint statement by the Global Initiative Against Impunity on ICC sanctions, making recommendations to ICC States Parties, the ICC Office of the Prosecutor, U.S Congress, and governments worldwide.
- **UK Leads on Russia Sanctions, but Must Do More to Deliver Reparation to Ukraine:** REDRESS Legal Fellow Lauren Schaefer presents a case for the UK government to do more to deliver reparation to Ukraine, including repurposing sanctions enforcement proceeds and the Chelsea FC sale funds, as well as using the Crime and Policing Bill to allow assets recovered through sanctions enforcement proceedings to be used to support survivors.

ABOUT THE COALITION

The authors of this report coordinate and work with a coalition of more than 340 civil society organisations around the world that advocates for the use of targeted human rights and anti-corruption sanctions as a tool to promote accountability. The coalition provides training, resources, and assistance to civil society groups to help them prepare well-documented recommendations to the U.S., Canada, UK, EU, and Australia identifying perpetrators eligible for human rights and/or corruption sanctions. Since 2017, the coalition has provided more than 200 sanctions recommendations to these jurisdictions, in addition to other forms of engagement and advocacy on sanctions targets.

ABOUT HUMAN RIGHTS FIRST

Human Rights First is a non-profit, nonpartisan international human rights organization that works to create a just world in which every person's intrinsic human rights are respected and protected, to build societies that value and invest in all their people. To reach that goal demands assisting victims of injustice, bringing perpetrators of abuse to justice and building institutions that ensure universal rights. For more about Human Rights First: www.humanrightsfirst.org

ABOUT REDRESS

REDRESS is an international human rights organisation that delivers justice and reparation for survivors of torture, challenges impunity for perpetrators, and advocates for legal and policy reforms to combat torture. As part of this work, REDRESS uses sanctions to prevent human rights abuses and corruption, through imposing a financial cost on the perpetrators. It does this by investigating abuses and submitting evidence to sanctions authorities; by using data-driven analysis to shape public policy; and by supporting NGOs across the world on using sanctions.

For more about REDRESS: www.redress.org

ABOUT OPEN SOCIETY FOUNDATIONS

The Open Society Foundations, founded by George Soros, are the world's largest private funder of independent groups working for justice, democratic governance, and human rights. For more about the Open Society Foundations: www.opensocietyfoundations.org

ABOUT THE RWCHR

Raoul Wallenberg Centre for Human Rights (RWCHR) takes on the most pressing struggles for justice, freedom, and democracy around the world. Founded and led by Irwin Cotler, former Minister of Justice and Attorney General of Canada, and based in Montreal, Canada, we mobilize and engage a non-partisan, global coalition of parliamentarians, scholars, jurists, NGOs, activists, and students to take a collective stand for international justice and human rights. For more about the Centre, please visit: www.raoulwallenbergcentre.org

ABOUT THE AUSTRALIAN CENTRE FOR INTERNATIONAL JUSTICE

The Australian Centre for International Justice (ACIJ) is an independent not-for-profit specialist legal centre dedicated to seeking justice and accountability for victims and survivors of serious human rights violations. Through sanctions referrals, strategic litigation, advocacy, and policy engagement, ACIJ seeks to strengthen Australia's legal and institutional frameworks to combat impunity effectively. We work with affected communities and partners locally and abroad in the global fight to end the impunity of those responsible for these violations. For more about the ACIJ: <https://acij.org.au/>

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