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# HUMAN RIGHTS AND ANTI-CORRUPTION SANCTIONS MID-YEAR UPDATE

**30 April 2026**

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 July 2025 to 31 December 2025**.

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

In the past six months, the Trump administration has continued to use Global Magnitsky sanctions and related sanctions programs significantly less than the Biden and first Trump administrations. This past year marks the lowest annual use of this program, as well as the Section 7031(c) visa restriction program, on record. The Trump administration has also removed Global Magnitsky sanctions at an unusually high rate, doing so without providing substantive explanations. The deprioritisation of these important accountability tools aligns with the Trump administration’s narrowing or outright dismantling of the U.S. government’s human rights and anticorruption work more broadly. Furthermore, several recent actions taken by the Trump administration under the Global Magnitsky program during this period have raised concerns that the program is being inappropriately used in pursuit of impunity for friends, rather than for accountability. Aside from the Global Magnitsky sanctions program, the U.S. government imposed targeted sanctions under six country-specific and thematic sanctions programs against more than 130 individuals and entities for their engagement in human rights abuses and/or corruption.

- **U.S. Global Magnitsky Sanctions Regime:** Between July and December 2025, only six individuals were sanctioned under the Global Magnitsky Sanctions program, with three individuals subsequently delisted in the following months. In July, Brazilian Supreme Federal Court justice [Alexandre de Moraes](#) was sanctioned for “authoriz[ing] arbitrary pre-trial detention and suppress[ing] freedom of expression,” following a [visa ban](#) earlier in the month. Sanctions were imposed seemingly in retaliation

for de Moraes overseeing the criminal case against former Brazilian President and Trump ally Jair Bolsonaro and legal actions taken against Elon Musk's companies for failure to comply with Brazilian law and court orders. In a follow-up action in September, the Lex Institute, a holding company for de Moraes, and his wife, Viviane Barci de Moraes, were sanctioned for providing material support to de Moraes. However, the U.S. removed sanctions against de Moraes, Barci, and the Lex Institute in December after relations between the Trump administration and Brazil had warmed.

- **Improper Delisting under the Global Magnitsky Sanctions Regime:** In October 2025, the Trump administration delisted former Paraguayan President Horacio Manuel Cartes Jara, who had been sanctioned in 2023 for corruption,<sup>1</sup> along with several entities connected to him. This delisting was met with domestic criticism, partially because it was enacted without providing the statutorily required advanced notice to Congress. This follows the administration's similar failure to give the required notice before the delisting of Hungarian minister Antal Rogan in April 2025 and the later delisting of Brazilian Justice de Moraes in December 2025.
- **Violations of Visa Confidentiality Following Imposition of Visa Bans:** U.S. federal law prohibits the disclosure of the specific individuals barred from entry into the country under Section 212(a)(3)(C) visa ban policies, yet the State Department has violated visa confidentiality requirements and identified persons determined to be ineligible for a U.S. visa on at least four occasions during the reporting period. In three of these instances, the Department's official press release included the names of those affected by the announced actions. These include actions against Justice de Moraes, Brazilian Ministry of Health officials, and Honduran national Marlon Ochoa. In another instance, the identities of the targeted individuals, including former European Commissioner Thierry Breton, were disclosed by a State Department official via social media.
- **Use of Sanctions to Target Accountability Mechanisms:** The U.S. continued to utilise the International Criminal Court (ICC) sanctions program (E.O. 14203) established in February 2025 during this period. The U.S. sanctioned four more ICC judges and two deputy prosecutors in August and December 2025 for their roles in ICC investigations into the situations in Palestine and Afghanistan, bringing the total number of ICC judges and court officials sanctioned to eleven. Furthermore, the Trump administration imposed sanctions on Francesca Albanese, the UN Special Rapporteur on the Situation of Human Rights in the Palestinian Territories Occupied since 1967, and on three Palestinian human rights NGOs.
- **Focus on Forced Labour in Southeast Asian Scam Centers:** In September, the U.S. government imposed Global Magnitsky sanctions on She Zhijiang, the creator of a scam center network in Myanmar, and designated other persons and entities under a different program for engaging in forced labour. Victims were reportedly lured to scam centers under false pretenses and subsequently detained, physically abused, forced to work for criminal organisations as online scammers, and forced into commercial sex work. Additional persons and entities connected to scam centers in Cambodia were sanctioned in this action. In October, Chen Zhi and the Prince Group were designated as a transnational criminal organisation and were sanctioned, along with over 140 other targets, for the operation of scam compounds in Cambodia. The U.S. government further designated the Democratic Karen Benevolent Army, senior leader Sai Kyaw Hla, and its associated network for operating cyber scam centers on 12 November 2025.

1 Human Rights First and its partners assessed the early impact of these sanctions in its 2023 report, *Evaluating Targeted Sanctions: A Flexible Framework for Impact Analysis*.

- Use of Section 7031(c) Visa Restriction Program:** From July through December 2025, the State Department publicly designated 17 foreign officials and their immediate family members under its Section 7031(c) visa restriction program. Section 7031(c) visa bans were imposed on Cuban government officials, including Cuban President Miguel Díaz-Canel Bermúdez, for gross human rights violations; on two Montenegro public officials for significant corruption; and on two former Haitian officials for corruption and interference with public processes.
- Expansion of Visa Restriction Policies under Section 212(a)(3)(C):** In September 2025, the U.S. State Department announced a new visa restriction policy targeting Central American nationals acting on behalf of the Chinese Communist Party (CCP) who “undermine the rule of law in Central America.” In December 2025, the State Department introduced a new policy for foreign nationals involved in “violations of religious freedom.” This policy was introduced in response to alleged violence against Christians in Nigeria, but no immediate designations were made under the new program.
- Continued Use of Established Section 212(a)(3)(C) Policies:** In July 2025, the State Department imposed visa bans against “numerous Cuban judicial and prison officials” for their involvement in the “unjust detention and torture” of participants in Cuba’s July 2021 protests. In August 2025, the State Department announced two actions under a July 2019 policy related to Cuba’s forced labour of physicians and other medical workers. In the first action, the Department imposed visa bans against “African, Cuban, and Grenadian government officials” for their involvement in “renting” exploited medical professionals from Cuba. In the second action, the Department imposed visa bans against Brazilian government officials and former Pan American Health Organisation officials for their involvement in a similar scheme. In December 2025, the State Department imposed visa bans on five individuals for alleged “efforts to coerce American platforms to censor, demonetise, and suppress American viewpoints they oppose.” In the same month, a visa ban was imposed against Marlon Ochoa and an unnamed individual under a 2021 policy related to undermining democracy in Guatemala, Honduras, and El Salvador.
- Sudan-Related Sanction Designations:** In September 2025, pursuant to E.O. 14098, the Al-Baraa Bin Malik Brigade, a Sudan-based Islamist militia, was sanctioned for contributing 20,000 fighters to the Rapid Support Forces (RSF), who have been implicated in arbitrary arrests, torture, and summary executions. In December 2025, four Colombian and Panamanian companies and four company officials were designated for their role in recruiting and deploying Colombians to fight alongside the RSF in Sudan. More recently, see here on how support from the United Arab Emirates and Colombian mercenaries enabled the fall of Al-Fashir, capital of North Darfur.
- Additional Human Rights Sanctions Imposed:** In August 2025, pursuant to E.O. 13413, as amended by E.O. 13671, the Coalition des Patriotes Résistants Congolais-Force de Frappe, an armed group in the eastern DRC, and associated companies were sanctioned for illegal mining operations, forced labour, and civilian executions. In October 2025, the U.S. imposed sanctions on two companies and three Iraqi bankers allegedly engaged in money laundering, sanctions evasion, and smuggling operations and on Dimitri Herard and Kempes Sanon for involvement with the Haitian gang coalition, Viv Ansanm. Both sets of designations were imposed pursuant to E.O. 13224, as amended by E.O. 13886, relating to counterterrorism efforts. In December 2025, the Mexican cartel, Cartel de Santa Rosa de Lima, and its leader, Jose Antonio Yopez Ortiz, were sanctioned for increasing violence, homicides, and kidnappings in Guanajuato pursuant to E.O. 13581.

- **Judicial Protections Upheld in Sanctions-Related Cases:** In September 2025, the U.S. District Court for the Eastern District of New York rejected a discovery request made by an individual sanctioned for violence in the Israeli-occupied West Bank to access information about Democracy for the Arab World Now's (DAWN) advocacy for sanctions against him, upholding protections for civil society groups engaged in sanctions advocacy. In December 2025, the Treasury Department responded to a request by the Knight First Amendment Institute on behalf of the U.S. nonprofit Middle Eastern Studies Association (MESA) seeking assurances that inviting Francesca Albanese, who is subject to U.S. sanctions, to speak at an online event would not violate U.S. sanctions law. The U.S. Government confirmed U.S. sanctions do not bar MESA from inviting Albanese to speak, citing the International Emergency Economic Powers Act's constraints.

## UK UPDATE: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

Between 1 July 2025 and 31 December 2025, the UK used its targeted sanctions programmes to respond to Russia's invasion of Ukraine, as well as addressing serious human rights violations and corruption in Iran, Syria, Sudan, and scam centres across Southeast Asia. The UK also adopted a new sanctions regime, targeting those involved in people smuggling and human trafficking. Meanwhile, the UK Supreme Court delivered a landmark judgment on how the courts will review challenges to designations under the UK's Russia sanctions regime. In total, during this period, the UK announced 19 targeted sanctions packages, designating 188 entities, 126 individuals, and 256 ships – including 12 and 38 designations under the Global Human Rights and Irregular Migration Sanctions programmes, respectively. There were no designations under the Global Anti-Corruption Sanctions programme during this period.

- **Ramping up Economic Pressure on Russia and its Allies:** The UK's targeted sanctions strategy continues to prioritise disrupting Russia's war economy. Across 12 batches of sanctions (comprising almost 70% of all designations), the UK targeted Russia's oil and gas sectors, intelligence and disinformation activities, military supply chains, sanctions evasion networks, and overseas enablers. Key designations during the reporting period are as follows:
  - Implementing its "strongest sanctions yet", making 90 designations, including directly targeting Rosneft and Lukoil – two of the world's largest energy companies. At the time of the designations, Rosneft alone was responsible for nearly half of all Russian oil production. Later, the UK imposed a further 24 sanctions, targeting another four of Russia's largest oil companies with revenues over \$20 billion, as well as illicit networks trading in Russian oil and funnelling vital military supplies to Russia's front-line.
  - Targeting the Russian military intelligence agency (GRU) as well as officers implicated in the bombing of Mariupol Theatre and targeting of Yuliya Skripal and her father
  - Imposing additional sanctions on individuals and entities responsible for online information warfare, as well as Georgia-linked actors involved in disinformation and supporting Russia's shadow fleet. The UK also targeted leading Russian officials and State-linked youth organisations, addressing Russia's forced deportation and indoctrination of Ukrainian children.
  - Tightening sanctions on Russia's shadow fleet, targeting several batches of vessels, as well as key entities facilitating their operation.
  - Coordinating with the U.S. and Australia to target a Russian cybercrime group providing so-called 'bulletproof' hosting services that enable cyber criminals to engage in ransomware, phishing attacks, and other illegal activity. Meanwhile, the UK also joined the U.S. in targeting networks channelling Russian money through the Kyrgyz financial sector, as well as a rouble-backed cryptocurrency token designed specifically to evade Western sanctions.

- For additional analysis, see the UK House of Commons Library’s briefings on [how sanctions against Russia have changed since January 2025](#), and [how countries supporting Russia’s invasion of Ukraine have increasingly faced sanctions](#).
- **Dismantling Southeast Asia Scam Centres:** The UK [imposed sanctions](#) on six entities and six individuals, including Prince Group Chairman Chen Zhi, for operating scam centres across Southeast Asia. These illegal scam centres traffic vulnerable workers and engage in torture to force victims’ participation in online scams targeting individuals abroad, including in the UK. This action was taken under the UK’s Global Human Rights Sanctions programme, in coordination with the U.S. Office of Foreign Assets Control.
- **Long Anticipated Launch of Irregular Migration Sanctions Regime:** On 22 July 2025, the UK adopted the [Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025](#). This new regime allows the UK to [impose sanctions](#) on anyone complicit in people smuggling or “organised immigration crime gangs.” At launch, the UK announced an initial batch of 25 designations on people-smuggling networks around the world. In October 2025, additional sanctions were imposed targeting [gangs operating in the Western Balkans migration route](#) and financiers of small boat engines. In a [Parliamentary debate](#) addressing the new programme, the UK Government emphasised it as being “the first dedicated regime of its kind anywhere in the world”, which will allow it to target all those involved in smuggling and organised immigration crime, including “hostile state-backed actors who seek to weaponise migration to destabilise the UK or our allies.”
- **Snapback Sanctions in Iran:** Due to Iran’s non-performance of its Joint Comprehensive Plan of Action commitments, the [UK, along with France and Germany](#), notified the UN Security Council to trigger the “snapback” process to reimpose UN sanctions on Iran. On 1 October 2025, the UK reimposed sanctions on [121 individuals and entities](#) involved in Iran’s nuclear development and ballistic missile programs following the imposition of sanctions on an additional 70 individuals and organisations linked to Iran’s nuclear programme in September. The UK continued to impose sanctions on Iran in other contexts, including sanctioning [Ali Aliakbar Ansari](#) for providing financial support to the Islamic Revolutionary Guard Corps (IRGC) and imposing sanctions on [one individual and four companies](#) that financially support Iran’s “destabilising activities.” Relatedly, see the UK House of Commons Library briefing on [Iranian state threat activities in the UK](#).
- **Latest Sudan Sanctions addressing RSF crimes in Darfur:** The UK imposed its latest batch of Sudan sanctions, targeting [four senior commanders](#) in the paramilitary RSF linked to international crimes committed during its siege and capture of Al-Fashir, the capital of North Darfur in Sudan. The UN Fact-Finding Mission on Sudan has since found that the RSF’s conduct in Al-Fashir is [indicative of genocide](#). The Office of the Prosecutor of the ICC is [investigating](#) alleged Rome Statute crimes committed in Darfur, with a particular focus on Al-Fashir, as well as El-Geneina (West Darfur). It has already received “information and evidence reflecting a myriad of crimes allegedly committed against civilian populations by members of the RSF.”
- **Targeting Actors Linked to Violence Against the Syrian People:** The UK sanctioned [four individuals and three organisations](#) that played a crucial role in atrocities committed throughout the height of the Syrian Civil War, and in violence across coastal regions of Syria. In the same package, the UK also targeted two individuals who financially supported the former Assad regime. Relatedly, see the House of Commons Library briefing on [the state of Syria one year after Assad](#), which focuses on the lifting of sanctions and reconstruction efforts.

- Landmark Supreme Court Ruling Upholds Sanctions Designations:** On 29 July 2025, the UK Supreme Court upheld the lawfulness of sanctions designations in two parallel cases related to the UK’s Russia sanctions programme, Shvidler v Secretary of State for Foreign, Commonwealth and Development Affairs and Dalston Projects Ltd v Secretary of State for Transport. The reasoning adopted by the Supreme Court is palpably deferential to the UK Government, finding that the relevant Ministers have “special constitutional responsibilities to respond to and contain Russia’s invasion of Ukraine” and “superior institutional competence to make the relevant assessment”. Lord Leggatt issued a robust dissent in Shvidler, referring to the designation as “Orwellian” and warning against allowing “guilt by association” to become normalised (A key factor in Shvidler’s designation was his association with Roman Abramovich). REDRESS’ analysis of the case can be accessed [here](#).
- Deadlock continues on Chelsea FC Funds:** Nearly four years on from the sale of Chelsea Football Club, the £2.35bn sale proceeds remain frozen in a UK bank account due to a protracted dispute between Roman Abramovich, former owner of the club, and the UK Government, which sanctioned Abramovich back in March 2022. The funds have since accrued at least £200 million in interest. In December 2025, the UK authorities issued a licence that would allow Abramovich to transfer the funds to humanitarian causes. While the terms of the licence are not public, a letter from the UK’s Foreign Secretary indicates that it requires the proceeds to go to “humanitarian causes in Ukraine”, whereas any “future gains can be spent more broadly on victims of the conflict worldwide.” Mike Penrose, formerly of UNICEF, has recently applied to establish a charitable foundation that would disburse the funds, though it remains to be seen whether Abramovich and the UK Government will agree on the terms of any disbursement.

## EU UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

- EU Global Human Rights Sanctions Regime:** On 15 July 2025, the EU sanctioned eight persons and one entity for serious human rights violations on behalf of Iranian state bodies outside of Iran. On 5 September 2025, the EU added two persons under the EU Global Human Rights Sanctions Regime (EUGHRSR), a head and deputy head of the Directorate of the Russian Federal Penal Enforcement Service for the ‘Republic of Crimea and the City of Sevastopol’. Sanctions were imposed in response to systematic human rights violations in Crimean detention centres documented by the UN and the European Court of Human Rights (ECHR). In particular, ill-treatment and denial of medical care to political prisoners have repeatedly occurred at the Simferopol detention centre in Crimea and have affected, among others, human rights defenders Iryna Danylovysh and Amet Suleymanov. By the end of 2025, the EU imposed a total of 172 sanctions under the EUGHRSR, of which 37 were imposed on entities. The EU further prolonged the EUGHRSR until 8 December 2026.
- Alignment of Third Countries to EU Sanctions Against Serious Human Rights Violations:** Between 1 July and 31 December 2025, several non-EU European countries aligned with the EUGHRSR, namely in relation to the wave of violence in Syria’s coastal regions.
- European Parliament Report on EUGHRSR:** The European Parliament, working on its own initiative, prepared a report on addressing impunity through EU sanctions, including the EU Global Human Rights Sanctions Regime. The report, prepared between June 2025 and November 2025, examines the effectiveness of targeted human rights sanctions. The report was adopted on 21 January 2026, following the five-year anniversary of the establishment of the EUGHRSR.

- **€90 Billion EU Loan to Ukraine:** In December, EU leaders agreed to provide a €90 billion loan to Ukraine over the next two years to fund its defence against Russia. However, the EU ultimately decided to borrow the requisite amount rather than utilise frozen Russian assets to finance the loan following resistance by Belgium and fears of legal reprisals. As of writing, the Council of the European Union has now adopted the final key piece of legislation underpinning the loan.
- **Sustained Economic Pressure on Russia:** During the reporting period, the EU imposed its 18<sup>th</sup> and 19<sup>th</sup> sanctions packages against Russia in response to the war in Ukraine. The 18<sup>th</sup> sanctions package, imposed on 18 July 2025, designated 14 individuals and 41 entities, lowered the price cap on crude oil to \$47.6 per barrel, imposed restrictive measures on 105 shadow fleet vessels, introduced a ban on Russian refined petroleum products, and imposed a transaction ban on Nord Stream 1, Nord Stream 2, and 22 additional Russian banks. The 19<sup>th</sup> sanctions package, imposed on 23 October 2025, added 69 individual listings and imposed restrictive measures on Russia’s energy, finance, and military sectors. It further imposed measures on Belarus to restrict support for Russia’s war effort and added a new listing criterion to designate those responsible for the abduction of Ukrainian children. In December 2025, the EU imposed restrictive measures on an additional 41 vessels linked to Russia’s shadow fleet.
- **Sanctions Imposed for Human Rights Violations in Russia:** On 20 November 2025, the EU sanctioned 10 individuals, including prison officials and members of the judiciary, for serious human rights violations and repression of civil society and democratic opposition in Russia. In December 2025, the EU imposed sanctions on an additional two members of the judiciary for politically motivated rulings against opposition figures and human rights defenders.
- **Continued Use of EU Hybrid Threats Sanctions Framework:** The EU added multiple listings under its 2024 Hybrid Threats Sanctions Framework, through which restrictive measures may be imposed on Russia-associated individuals and entities that undermine electoral processes or spread disinformation, among other listing criteria. On 26 June 2025, Nathalie Yamb, a dual Swiss-Cameroon national, was listed under this framework for her “outspoken support” for Russia and her ties to an organisation linked to Russian private military activity in Africa. On 15 December 2025, the EU sanctioned an additional 12 individuals and two entities for information manipulation and malicious cyber-activities. Several non-EU European countries aligned with the EU’s Hybrid Threats Sanctions framework.
- **Sanctions Imposed on Entities Destabilising Moldova:** On 15 July 2025, the EU added seven people and three entities to its designation list in view of actions destabilising the Republic of Moldova. Non-EU European countries aligned with these sanctions.
- **Restrictive Measures Imposed in Response to Gang Violence in Haiti:** On 15 July 2025, the EU added three individuals who have engaged in criminal activities and gang violence in Haiti to its designation list. Non-EU European countries subsequently aligned with these measures. In December 2025, the EU further imposed restrictive measures on three individuals and one entity for escalating gang violence, persistent gang-related human rights abuses, and continuing impunity for perpetrators.
- **EU Sanctions Concerning Atrocities in Sudan:** On 18 July 2025, the EU sanctioned two Sudanese commanders and two entities in relation to the ongoing human rights violations committed against civilians in Sudan. The EU sanctioned a field commander within the RSF responsible for violations in the Kordofan region, as well as Abu Aqla Kaikal, a militia commander now allied with the Sudanese Armed Forces (SAF) who has overseen various atrocities in Gezira State. The EU also sanctioned a SAF-

aligned mining company, as well as a bank used by the RSF to finance its operations. In September 2025, the EU extended the restrictive measure regime in relation to Sudan for an additional year, until 10 October 2026. In addition, in November 2025, the EU sanctioned Abdelrahim Hamdan Dagalo, deputy leader of the RSF, in response to RSF violence during the siege of Al-Fashir.

- **Expansion of Scope of the EU Sanctions Regime Related to Belarus:** The EU added a new criterion for designating individuals or entities associated with Belarus that attempt to undermine democracy in EU member states. The new criterion allows the EU to impose restrictive measures on those who engage in or support foreign information manipulation and interference, target the functioning of democratic institutions, economic activities or public interest services of the EU, or enter a member state's territory without authorisation. The additional criterion covering hybrid activities was introduced on the initiative of Lithuania and other Baltic states.
- **Efforts to Stop Sanctions Evasion:** On 8 July 2025, the Marburg Regional Court sentenced an individual to five years in jail and confiscated assets worth €5 million for exporting luxury cars to Russia in violation of EU sanctions. Following a November 2025 meeting, the European Anti-Fraud Office and Europol's Target Group Sanctions announced a new joint initiative, Project Transporter, to support EU Member States in investigating sanctions breaches and enforcing sanctions regimes related to vehicle exports to Russia and Belarus.

## CANADIAN UPDATE: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

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During the reporting period, the Canadian Government designated four individuals associated with gross and systematic human rights abuses in Iran using its targeted sanctions regime. This marks a sharp decline in the use of Magnitsky-style sanctions under Mark Carney's newly elected Liberal government. In comparison, in the first half of 2025, Canada sanctioned 55 individuals and 13 entities for human rights abuses, and in the second half of 2024, it designated 41 individuals and seven entities on the same grounds. This trend reflects the Government's priority to diversify Canada's trade and investment with reliable trading partners. In addition, during this period, Canada enacted sanctions triggered exclusively by grave breaches of international peace and security, targeting persons from or linked to Russia and Moldova. Moreover, the Government of Canada implemented measures to further support Syria's political transition, as well as notable financial enforcement and sanctions compliance measures. Designations during this period were imposed under the Special Economic Measures Act (SEMA) and the United Nations Act (UN Act). There were no listings under the Justice for Victims of Corrupt Foreign Officials Act (the Sergei Magnitsky Law).

- **Renewed Designations in Response to Pro-Russian Interference in Moldova:** On 26 August 2025, the Canadian government designated 16 individuals and two entities for grave breaches of international peace and security. The designated actors participated in coordinated efforts to destabilise the democratically elected government in Moldova and have ties to Russia and its operations abroad. This marks the third round of sanctions on Moldova, following two earlier rounds imposed in 2023.
- **Ongoing Measures to Support Syria's Stabilisation and Political Transition:** On 27 August 2025, Canada extended the validity period of the General Permit (Syria) for a further six months, easing sanctions for specified activities and transactions aimed to support Syria's stabilisation and the delivery of humanitarian assistance. In December 2025, Canada announced it had removed Syria from its List of Foreign State Supporters of Terrorism under the State Immunity Act and further removed Hay'at Tahrir al-Sham from its List of Terrorist Entities under the Criminal Code.

- **Sustained Economic Pressure on Russia in Response to the Invasion of Ukraine:** On 28 August 2025, Canada lowered the price cap on Russian oil from U.S. \$60 to U.S. \$47.60 per barrel to reduce Russia’s oil export revenues as part of its broader strategy to deprive Russia of the financial means to sustain its war against Ukraine. On 6 November 2025, Canada designated 13 individuals and 11 entities, as well as 100 shadow fleet vessels, linked to Russia’s war of aggression. Those designated include actors involved in drone development and deployment, sanctions evasion, liquified natural gas exports, cyber operations, and foreign influence activities.
- **Reimposition of United Nations Security Council Sanctions on Iran:** On 30 September 2025, Canada reimposed (previously terminated) UN Security Council sanctions on Iran in response to its refusal to limit its nuclear program as stipulated in the Joint Comprehensive Plan of Action and to cooperate with the International Atomic Energy Agency. The sanctions include export and import prohibitions, technical and financial assistance prohibitions, services prohibitions for Iranian vessels, and a comprehensive arms embargo. These sanctions followed the ‘snapback’ process initiated by France, Germany, and the UK, culminating in the full reinstatement of UN nuclear-related sanctions against Iran on 28 September 2025.
- **Largest Financial Penalty Imposed by Canada’s Financial Intelligence Agency:** On 16 October 2025, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) imposed its largest-ever penalty on a cryptocurrency exchange for failing to report suspicious transactions linked to attempts to launder money acquired through fraud, trafficking of child sexual abuse materials, sanctions evasion, and ransomware payments. FINTRAC fined Xeltox Enterprises Ltd. (operating as Cryptomus) \$176,960,190 for non-compliance with the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and associated regulations.
- **Updated Ministerial Directive on Iran:** On 15 November 2025, Canada updated its Ministerial Directive on the Islamic Republic of Iran and published new FINTRAC guidance to safeguard Canada’s financial system against sanctions evasion. The guidance states that every financial transaction to or from Iran must be treated as a high-risk transaction, regardless of the amount, and reported to FINTRAC.
- **Designations Targeting Senior Iranian Officials:** On 15 December 2025, the Canadian government imposed targeted sanctions on four Iranian individuals involved in systematic human rights violations. The designations targeted senior Iranian officials who have held prominent roles within the IRGC and the Iranian prison system. These listings mark 17 rounds of human rights sanctions imposed on Iran since October 2022, designating a total of 114 individuals and 17 entities.

## AUSTRALIA UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

- **Targeted Sanctions in Response to Repression of Civil Society in Russia:** On 3 September 2025, Australia imposed targeted financial sanctions and travel bans against 14 individuals under the Russia sanctions regime on the basis that each target is responsible for silencing political expression in Russia and enabling the invasion of Ukraine.
- **Counter-Terrorism Financing Sanctions Imposed:** On 13 September 2025, Australia relisted 33 entities and 10 persons, including Hamas, Hezbollah and Palestinian Islamic Jihad, under its counter-terrorism financing sanctions regime. Australia further imposed new counter-terrorism financing sanctions on three persons and one entity linked to Hamas.

- **The Imposition of Targeted Sanctions on Russian Shadow Fleet Vessels:** On 18 September 2025, Australia imposed targeted sanctions on 95 Russian shadow fleet vessels known to circumvent international sanctions and support the Russian war economy. Australia imposed these sanctions alongside the EU, the UK, Canada, New Zealand and Japan. In December 2025, the Australian Government imposed targeted sanctions on a further 45 vessels linked to Russia's shadow fleet, bringing the total number of sanctioned shadow fleet vessels to 200.
- **Disrupting Cybercrime Funding of Weapons of Mass Destruction:** On 6 November 2025, Australia imposed financial sanctions and travel bans on four entities and one individual engaged in cybercrime used to fund North Korea's weapons of mass destruction and ballistic missile programs. Sanctions were imposed in a coordinated effort with the U.S.
- **Coordinated Sanctions Against Russian Ransomware Infrastructure Providers:** On 20 November 2025, Australia imposed sanctions against two Russian cybercrime service providers and two of their key personnel, on the basis that these organisations have provided their ransomware infrastructure to malicious cyber actors and cybercriminals. Australia imposed sanctions in partnership with the UK and the U.S.
- **Introduction of New Autonomous Sanctions Framework for Afghanistan:** On 6 December 2025, the Australian Government established an autonomous sanctions framework for Afghanistan. The framework includes an arms embargo, prohibiting Australians from supplying arms and any related services or materials to Afghanistan. It further permits targeted sanctions on persons and entities responsible for the oppression of women, girls and minority groups. Additional mechanisms include the imposition of financial sanctions, asset freezes, and travel bans. There are currently four individuals listed under this framework, all of whom are senior Taliban officials.
- **Senate Inquiry - Sanctions against the Russian Federation:** On 5 November 2025, the Australian Senate referred the effectiveness of sanctions against Russia for inquiry with a report expected by 20 March 2026. Public submissions closed on 23 January 2026.

## NEW RESOURCES AND MEDIA FROM THE MAGNITSKY SANCTIONS

### COALITION

- **U.S. Global Magnitsky and Related Sanctions: Mid-Year Update July 1, 2025 – December 31, 2025:** Human Rights First published a report in March 2026 tracking designations and trends in key sanctions and visa restriction programs relating to human rights abuses and corruption in the second half of 2025.
- **UK Sanctions Developments Addressing Russia-Ukraine Conflict:** REDRESS released a report analysing the UK Government's use of sanctions between January 2025 to July 2025 in relation to Russia's war in Ukraine.
- **Sanctions Misuse: The Dubious Lifting of U.S. Targeted Sanctions:** Human Rights First convened a panel discussion in August 2025 on the Trump administration's recent actions lifting sanctions and other measures, in cases in the Dominican Republic, Hungary, Myanmar, Russia, and the West Bank.

- **Delivering Reparation to Ukraine from the £2.5 Billion Sale of Chelsea FC:** In August, REDRESS released a briefing urging the UK government to release the frozen funds from the sale of the Chelsea FC and utilise the funds to benefit victims of the war in Ukraine.
- **UK Must Do More to Deliver Reparation:** REDRESS' Legal Fellow Lauren Schaefer presents a case for the UK government to do more to deliver reparation to victims of Russia's war in Ukraine, including repurposing the Chelsea FC sale funds and changing the law to allow assets recovered through sanctions enforcement to more readily support survivors.
- **Neither Shaming nor Naming: New Data on the Confidential Visa Bans under Section 7031(c):** In a follow-up to its 2023 report, Human Rights First analysed new data from the State Department showing how the Section 7031(c) visa bans have been used confidentially in recent years.
- **Section 7031(c) Visa Sanctions Explainer:** In September 2025, Human Rights First updated its explainer on the details and logistics of the Section 7031(c) visa sanctions program in light of the U.S. government's use of the program in recent years.
- **Repurposing Assets for the Reparation for Syrian Survivors: Pathways for EU Institutions and Member States:** In October 2025, REDRESS released a briefing providing guidance to the EU and its Member States on asset recovery for reparations in Syria following consultations with Syrian survivors and civil society.
- **Briefing on Amendments to the Crime and Policing Bill to Establish Public Interest Compensation Orders:** REDRESS published a briefing outlining proposed amendments to the 2025 UK Crime and Policing Bill to introduce public interest compensation orders that allow confiscated criminal assets, including those obtained from sanctions breaches, to be awarded to benefit victims.
- **Human Rights First Seeks Sanctions for Torture in Bahrain Prisons:** In December, Human Rights First submitted a dossier to the U.S. government recommending targeted sanctions against Sheikh Rashid bin Abdullah al Khalifa, Bahrain's interior minister, based on his role in torture and cruel, inhuman, or degrading treatment in prisons he oversees.
- **Global Corruption, Local Hypocrisy:** In a Just Security article, Human Rights First's Adam Keith and co-author Schuyler Miller discussed the upcoming U.S. State Department reports required by the Combatting Global Corruption Act and the challenges with U.S. anticorruption efforts globally at a time of U.S. backsliding at home.
- **Statement by Ukrainian Survivors on International Compensation Mechanism for Victims of Russian Aggression:** REDRESS, alongside other civil society organisations, endorsed a letter from Ukrainian survivor groups highlighting their views on future international compensation mechanisms. The statement expressed support for the International Claims Commission for Ukraine but stressed the need to expand the temporal scope of the commission to include victims of Russian aggression beginning on 20 February 2014.
- **Briefing on Funding Reparation for Ukrainian Survivors:** REDRESS published a briefing in advance of the December 2025 Parliamentary Backbench Business Debate on the war in Ukraine. The briefing gave guidance on providing funds to individual Ukrainian survivors as reparation.

## **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](http://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](http://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](http://www.opensocietyfoundations.org)

## **ABOUT THE RWCHR**

The 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](http://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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Ending torture, seeking justice for survivors