



Photo by Andrea de Santis on Unsplash

GLOBAL MAGNITSKY AND RELATED SANCTIONS SEMI-ANNUAL UPDATE

31 March 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 its targeted human rights and anticorruption sanctions programmes from 1 July 2024 to 31 December 2024.

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

Between 1 July and 31 December 2024, the U.S. sanctioned 48 persons under its Global Magnitsky programme across seven countries and used several other sanctions programmes to target an additional 56 persons involved in human rights abuses and corruption in six countries. Under its Section 7031(c) visa restriction programme, the State Department targeted 32 government officials involved in human rights violations or corruption and their family members across 10 countries, and under its Section 212(a)(3)(c) authority, it announced four new visa ban policies and follow-up actions under 13 previously created policies related to human rights, corruption, and undermining democracy. A more detailed overview of recent U.S. targeted sanctions and visa restrictions focused on human rights abuses and corruption can be found [here](#).

- **Decline in Global Magnitsky Sanctions Levels Out:** After Human Rights First and the targeted human rights and anticorruption sanctions coalition raised repeated concerns about the slowdown in Global Magnitsky sanctions over the course of the Biden administration, the U.S. government ended 2024 on an average note. By year’s end, a total of 69 individuals and entities had been sanctioned under the Global Magnitsky programme, 33 of which were considered “primary” designations. In the eight years since the Global Magnitsky programme was created, the U.S. government has on average designated approximately 75 individuals and entities per year, including an average of 34 “primary” designations.

- Moving Away from Large Announcements for Human Rights and International Anticorruption Days?:** The U.S. government announced a much smaller number of Global Magnitsky sanctions than usual to mark International Anticorruption Day and Human Rights Day (December 9 and 10 respectively). While it did mark those days with sanctions for abuses in Houthi prisons and a corrupt network linked to the export of gold and diamonds from Zimbabwe, the Treasury Department appeared to spread out several other announcements between September and December. Separating announcements like this can help draw more attention to each one and prevent smaller actions from being overshadowed.
- Focus on Violence and Repression in Georgia:** With growing violent crackdowns on protesters ahead of Georgia’s October elections, the U.S. government imposed its first Global Magnitsky sanctions against Georgian officials and individuals in September 2024. These included the Chief of the Ministry of Internal Affairs Special Task Department Zviad Kharazishvili and his deputy, Mileri Lagazauri, as well as two individuals tied to media company Alt-Info, who spread disinformation and hate speech and had spurred violent attacks in 2021 and 2023 against marginalised persons, journalists, and nongovernmental organisations. These were followed with additional actions in December to target the founder of the Georgian Dream party, Bidzina Grigoris Dze Ivanishvili, for undermining democratic processes or institutions, as well as Minister of Internal Affairs Vakhtang Gomelauri and deputy head of the Special Task Department Mirza Kezevadze, for violence against protesters opposing the “foreign influence law” earlier in the year. Finally, the State Department took actions under a visa restriction policy to target approximately twenty unnamed Georgian individuals, including government ministers, Parliamentarians, law enforcement and security officials, municipal government officials, and private citizens for undermining democracy.
- Second Forced Labour Global Magnitsky Case & Sanctions in Human Trafficking Proclamation:** In September 2024, the U.S. government imposed Global Magnitsky sanctions on a powerful Cambodian senator and businessman and related entities for engaging in forced labour of trafficked workers in cyber scam operations. This was the second Global Magnitsky case to primarily respond to forced labour abuses. In December 2024, the White House issued a Proclamation on National Human Trafficking Prevention Month, in which it cited it had sanctioned “over 240 individuals and entities for serious human rights abuses under the Global Magnitsky Sanctions Program.” This figure covers *all* human rights Global Magnitsky sanctions imposed under the Biden administration – not just those imposed for human trafficking – as well as 157 vessels that were designated as part of a December 2022 action against abuse tied to illegal fishing operations on PRC-registered ships.
- Second Global Magnitsky Case Based on Single Arbitrary Detention:** In December 2024, the Treasury Department imposed Global Magnitsky sanctions on Russian judge Olesya Mendeleeva for her role in the arbitrary detention of dissident Alexei Gorinov. Mendeleeva serves as a district court judge in Moscow and had sentenced Gorinov in 2022 to seven years in prison under new laws to punish “knowingly disseminating false information” about the Russian army. These sanctions marked the second time Global Magnitsky sanctions were imposed against individuals for their direct involvement in a single case of arbitrary detention, following the 2023 sanctions in the case of Vladimir Kara-Murza.
- Still Waiting for Action Supporting Journalists:** Following President Biden’s May 2024 statement promising to declare crackdowns on press freedom as a grave threat to national security and to use sanctions and visa bans in response “in the coming weeks,” there were no sanctions or visa restrictions imposed specifically for this purpose, despite outstanding civil society recommendations in cases involving abuses against journalists.

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

UK UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

Between 1 July 2024 and 31 December 2024, the UK used its targeted sanctions programmes to respond to the invasion of Ukraine and the conflict in Israel-Gaza. Also, the UK's National Crime Agency (NCA) secured, by way of consent order, the forfeiture of sanctioned funds alleged to be held for the benefit of Russian individual, Petr Aven - the first recovery of its kind in the UK. In total, during this period, the UK has announced 12 targeted sanctions packages, designating 79 entities, 89 individuals and 110 ships. A more detailed update of recent UK sanctions developments between May and November 2024 can be found [here](#).

- **UK General Election & Labour Government's Sanctions Priorities:** In the run-up to the Labour Party's General Election [victory](#) on 4 July 2024, the now-Foreign Secretary David Lammy stated [that](#), "fighting kleptocracy will be a focus of the next Labour Office". In line with this stated commitment, on 9 December 2024, the UK government announced new funding of up to £36 million over five years for the NCA's International Corruption unit.
- **Targeting Russia's Access to Oil Revenue:** On 31 July 2024, the UK government brought into force new powers to sanction individual ships belonging to Putin's "Shadow Fleet" - around 600 [tankers](#) used to circumvent sanctions on Russian oil. On 25 November 2024, the UK imposed its [largest sanctions package](#) against Putin's "Shadow Fleet", [targeting](#) 30 ships and two insurance companies who enable the fleet. This new wave of sanctions was designed to choke Russian oil revenues. According to [the government](#), the targeted ships were "responsible for transporting billions of pounds worth of oil and oil products in the last year alone".
- **Targeted Sanctions against Russia Marking the 1000th Day of its Full-scale Invasion:** On 7 November 2024, the UK announced a new wave of sanctions striking "at the heart of Putin's war machine". These sanctions [targeted](#) Russia's military industrial complex, which reportedly supply vital equipment to the Putin regime, as well as Russian-backed mercenary groups involved in illicit activities and threatening security in Africa. This package included [56](#) new sanctions, constituting the UK's largest sanctions package against Russia since May 2023. Marking the 1000th day of the full-scale invasion of Ukraine, on 19 November 2024, the UK announced a further package of [ten](#) designations targeting alleged perpetrators of the Russian State's forcible deportation and attempted indoctrination of Ukrainian children. The individuals and entities targeted included Tetiana Zavalska, the Russian-appointed Head of Kherson Children's Home, from which 46 children were forcibly taken to Russia for adoption; Vitaliy Aleksandrovich Suk, the Director of the Oleshki Boarding School for children with disabilities; and the All-Russian Young Army Military Patriotic Social Movement (Yunarmia), a Russian paramilitary organisation reportedly central to the Putin regime's attempts to forcibly deport and indoctrinate Ukrainian children.
- **Suspending Weapons Transfers to Israel:** Following mounting [pressure](#) from civil society organisations (CSOs), on 2 September 2024, the UK [announced](#) the immediate suspension of around 30 Israeli export licences for items used in the current conflict in Israel-Gaza, due to concerns around Israel's compliance with International Humanitarian Law. This was coupled with three rounds of sanctions on [2 September](#), [10 September](#) and [14 October](#), targeting a total of 13 Iranian individuals and 7 entities, for allegedly supporting armed groups seeking to de-stabilise Israel, and developing ballistic missiles for attacks.

- Cracking Down on Russian Proxies:** On 13 June 2024, the UK added two entities, Diamville and Wood International Group Sarlu, to the UK's Central African Republic (CAR) sanctions regime. Both entities were designated because of their alleged association with the Wagner Group, a Russian private military group and proscribed terrorist organisation. 16 members of the Russian cyber-crime gang Evil Corp were also sanctioned on 1 October 2024, followed by six sanctions targeting Russian disinformation networks on 28 October 2024. On 9 December 2024, the UK, in coordination with the U.S., imposed sanctions on five individuals, including infamous British-Kenyan gold smuggler Kamlesh Pattni and his enablers. These measures were adopted with the stated aim "to combat the illicit gold trade that fuels corruption and finances Putin's war efforts".
- On 18 November 2024, the UK imposed further sanctions on Iran in response to its transfer of ballistic missiles to Russia. These sanctions followed the UK's September 2024 announcement of initial commitments to these measures, in co-ordination with France and Germany. Both the Iranian State-owned airline, Iran air, and the State-owned national shipping carrier, Islamic Republic of Iran Shipping Lines were subjected to an asset freeze for their reported role in aiding Russia's invasion of Ukraine.
- Maintaining Pressure on Belarus:** Marking the fourth anniversary of the widely disputed presidential elections in Belarus, on 9 August 2024, the UK designated seven individuals and entities, in coordinated action with the U.S. and Canada. The four individuals targeted are commanding officers of Belarusian penal colonies, where political prisoners have allegedly been subjected to torture. In addition, three Belarusian entities were sanctioned for their role in producing goods for military use. On 3 October 2024, the UK imposed an asset freeze on CJSC Alfa Bank Belarus, a subsidiary of Russia's largest private bank, due to its links to the Belarusian government.
- Holding Israeli West Bank Settlements to Account:** On 15 October 2024, the UK government announced sanctions on three Israeli settler outposts and four Israeli organisations in the West Bank, for their reported links to activities amounting to cruel, inhuman, or degrading treatment or punishment of Palestinians.
- Applying Pressure on Myanmar Security Forces:** On 29 October 2024, in coordination with the EU and Canada, the UK announced a further round of sanctions to increase pressure on the Myanmar military regime and its associates, following reports that August 2024 saw the highest number of airstrikes on record by the Myanmar military. The sanctions targeted six entities supplying aviation fuel to the Myanmar Security Forces.
- Enforcing Sanctions Breaches:** During the reporting period, the UK took several actions to enforce its sanctions regime. Among them, on 29 July 2024, the NCA secured the first forfeiture of £783,827 in frozen funds allegedly held for the benefit of Russian sanctioned individual Petr Aven. The UK government is yet to confirm what it will do with the recovered funds. On 27 September 2024, the UK's sanctions enforcement authority, the Office for Financial Sanctions Implementation (OFSI) fined Integral Concierge Services Limited £15,000 for breaching the UK Russia Sanctions Regulations. This marks the first OFSI fine under the UK Russia Sanctions Regulations since Russia's full-scale invasion of Ukraine in 2022. On the same day, the UK's financial services regulator, the Financial Conduct Authority, also fined Starling Bank Limited £28,959,426 for deficiencies in its money laundering and sanctions screening framework.

- **New Campaign to Crack Down on Corruption:** On 21 November 2024, the UK sanctioned three kleptocrats and their associates for “stealing wealth from their home countries for personal gain”. These sanctions marked the commencement of the Foreign Secretary’s new campaign to crackdown on corruption and illicit finance. The individuals targeted include Dmitry Firtash, an “infamous oligarch” who has reportedly “extracted hundreds of millions of pounds from Ukraine through corruption and his control of gas distribution”; Isabel Dos Santos, the daughter of Angola’s former president and once touted “Africa’s richest woman”, who is reported to have “systematically abused her positions at State-run companies to embezzle at least £350 million, depriving Angola of resources for much-needed development”; and Aivars Lembergs, one of Latvia’s richest people, who has reportedly abused his political position to commit bribery and launder money.
- In an effort to further strengthen this campaign, on 9 December 2024, the UK appointed Baroness Hodge of Barking as new UK Anti-Corruption Champion and reiterated its pledge to bring forward an “ambitious, government-wide anti-corruption strategy in 2025”. These announcements come on the back of a major NCA investigation from the previous week – Operation Destabilise – which exposed and disrupted Russian money laundering networks supporting serious and organised crime around the world.
- **New Sanctions against Georgian officials:** On 19 December 2024, the UK designated five Georgian officials responsible for violent attacks against journalists and peaceful protestors in Georgia, in coordinated action with the U.S. The individuals designated include Georgia’s Minister for Interior and the Director of the Tbilisi Police Department and three high-ranking police chiefs. The announcement followed the UK’s decision to immediately suspend all UK programme support to the Georgian government and restrict engagement.

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

EU UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

- **EU Global Human Rights Sanctions Regime:** Following relatively sparse designations by the EU under the Global Human Rights Sanctions Regime (EUGHRSR) in 2021-2023, it ended 2024 with 63 new listings/designations. Following the documentation and analyses identifying the use of EUGHRSR excessively in favour of designations in relation to human rights violations in Russia (67% of them were from Russia by spring 2024), in 2024, the EU made more designations for human rights violations in other countries and regions (Syria, Democratic People’s Republic of Korea, Israel, Gaza, West Bank, Haiti). However, the total number of designations from Russia are still 64 % of the total designations in 2024. This is largely due to the fact that the EU sanctioned several dozen Russian officials for human rights violations in the Russian penitentiary system in early 2024. This is likely to change in 2025, following the EU’s adoption of a country specific human rights sanctions regime in view of the situation in Russia, which came into effect in May 2024.
- **Sanctions against Hybrid Threats:** In October 2024, the EU adopted a new sanctions framework to counter hybrid activities against the EU and its Member States. It targets those who are responsible for, implement, support or benefit from Russia’s destabilising actions worldwide including election interference; violent demonstrations; acts of violence (including intimidation and coercion) against

people that criticise Russia’s actions or policies; information manipulation and interference; actions targeted at the functioning of democratic institutions/economic activities/services of public interest (including through cyber activities); instrumentalisation of migrants; exploitation of an armed conflict, including through exploiting or trading natural resources and wildlife; and instigating or facilitating armed conflict in a third country. 16 individuals and three entities were added to this framework in December 2024.

- **Russia’s War of Aggression Against Ukraine:** At the end of December 2024, the EU adopted its 15th sanctions package against Russia, targeting its shadow fleet, introducing further anti-circumvention measures, sanctioning individuals and entities. With this package, it is the first time that the EU introduced “fully-fledged” sanctions (travel ban, asset freeze and prohibition to make economic resources available) on various Chinese actors.
- **Destabilising Moldova:** In October 2024, the EU added five individuals and one entity under the restrictive measures in view of actions destabilising the Republic of Moldova. The sanctions regime came into effect in May 2023.
- **Human Rights in Belarus:** In the second half of the year, the EU listed 28 individuals for their alleged role in internal repression and human rights violations in Belarus, in particular highlighting the role of judiciary, prosecutors and judges.
- **Democratic Republic of the Congo:** In July 2024, nine individuals and one entity was sanctioned by the EU for alleged acts constituting human rights violations and abuses in the Democratic Republic of the Congo (DRC) and for allegedly sustaining “armed conflict, instability and insecurity” in the Eastern DRC.
- **Situation in Sudan:** Given the deteriorating situation regarding peace, security and stability in Sudan, in December 2024, the EU sanctioned an additional four individuals for alleged arbitrary arrest and detention of members of civil society, as well as cases of sexual violence and torture.
- **New Anti-Money Laundering Authority (ALMA):** The new EU agency, ALMA, established in June 2024, will ensure coordination among the EU Member States on anti-money laundering and countering terrorist financing. The agency will ensure synergies between the AML/CFT rules and EU sanctions policies, focusing on countering the EU sanctions circumvention, “checking compliance with sanctions related measures by the riskiest cross-border groups in the financial sector”, providing input for the mitigation risks of sanctions evasion/non-implementation at the EU level.

CANADIAN UPDATE: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

Between 1 July 2024 and 31 December 2024, the Canadian government designated 41 individuals and seven entities associated with gross and systematic human rights abuses using its targeted sanctions regime. The designations were a response to human rights abuses connected with the conflicts in Russia-Ukraine, Israel-Gaza, and Myanmar; the repression of peaceful protestors in Belarus, Venezuela, and Iran; the repression of ethnic and religious minorities in China and Iran; and the suppression of women’s and girls’ rights in Iran. All designations were imposed under the Special Economic Measures Act (SEMA). The government coordinated these actions with international partners to implement at least three rounds of multilateral sanctions. During this period, one human-rights-related designation was repealed, and there were no listings under the Justice for Victims of Corrupt Foreign Officials Act (the Sergei Magnitsky Law).

- **Continued Solidarity with Belarusians and Support for Democracy in Belarus:** On 8 August 2024, Canada, in coordination with the EU, the UK, and the U.S., imposed sanctions on seven individuals and one entity for their involvement in ongoing and systematic human rights abuses in Belarus. Listed persons included judges who arbitrarily sentenced peaceful protestors and democracy defenders expressing opprobrium over the fraudulent elections of 2020, as well as a State-owned enterprise that suppressed their employees' right to freedom of assembly. These designations 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 of Russia's invasion of Ukraine. In recent years, there has been a gradual decline in the number of Canadian designations targeting Belarusian perpetrators.
- **Persistent Pressure on the Islamic Republic of Iran:** On 7 September 2024, Canada, in coordination with Australia and the U.S., listed five individuals for their direct involvement in the design and implementation of discriminatory and repressive policies towards women, girls, and minorities, including the violent repression of protestors. This brought the total number of designations to 205 individuals and 250 entities. These listings are in furtherance of Canada's longstanding sanctions regime against Iran and in accordance with broader policy measures responding to gross and systematic human rights violations and grave breaches of international peace and security, including the listing of the Islamic Revolutionary Guard Corps as a terrorist entity in June of 2024 under the Criminal Code.
- **Third Round of Sanctions Associated with Extremist Settler Violence in the West Bank:** On 17 September 2024, Canada imposed a third round of sanctions under its Extremist Settler Violence sanctions regime, which came into force in May 2024. Four individuals and two entities were designated for their involvement in acts of violence and harassment that undermined the human rights of Palestinians, including attacks on humanitarian convoys, the dispossession of property, and the displacement of communities. These designations were imposed alongside a fourth round of terrorist-related sanctions on Hamas and its affiliates for their complicity in the terrorist attacks in Israel on 7 October 2023.
- **Sustained Pressure on Myanmar's Military Junta:** On 25 October 2024, Canada, in coordination with the UK and the EU, designated three senior military officials and four entities in response to ongoing and escalating aerial attacks by the Myanmar military, resulting in mass fatalities and injuries. They were designated for supplying weapons, military equipment, key resources, and revenue to the Myanmar military. Listed officials are responsible for humanitarian and human rights law violations. These listings brought the total number of designations to 92 individuals and 45 entities since the coup d'état in 2021, when Canada heightened its application of sanctions against the military junta. Also, during this period, the family member of a former senior official was delisted after submitting a delisting application.
- **Unwavering Commitment to Ukraine - Designations and Multilateral Measures to Restrict Russian Exports and Prevent Sanctions Evasion:** On 9 December 2024, Canada imposed sanctions on nine Russians involved in ongoing and systematic human rights violations since the Russian Federation's full-scale invasion of Ukraine. Listed individuals were designated for the use of torture and ill-treatment against Ukrainian civilians and prisoners of war. The designations are part of a sustained and intensive sanctions effort in response to Russia's occupation of Crimea in 2014 and its full-scale invasion of Ukraine in 2022, amounting to nearly 2,500 Russian individuals and entities. Also, during the reporting period, Canada implemented several multilateral measures to restrict Russian exports and prevent sanctions evasion in coordination and alignment with international partners.

On 1 September 2024, Canada amended its [Russia regulations](#) to prohibit the purchase, import, or acquisition of certain diamonds mined or produced in Russia that are exported, processed and/or polished in a third country. On 24 September 2024, Canada published updated [guidance for industry](#) on preventing Russian export control and sanctions evasion. On 21 October 2024, Canada and its allies published a [Price Cap Coalition advisory](#) with best practices for the maritime oil industry and related stakeholders to prevent and disrupt sanctions evasion.

- **Second Round of Sanctions on the People’s Republic of China (PRC):** On 9 December 2024, Canada designated eight current or former senior officials involved in gross and systematic violations of human rights against ethnic and religious minorities in the PRC, including Uyghurs, Tibetans, and Falun Gong Practitioners. This was the second round of sanctions under the PRC’s sanctions regime, both of which responded to government-led repression against minorities, including mass arbitrary detention, forced labour, torture, and ill-treatment.
- **Amended Regulations and Second Round of Renewed Sanctions in Venezuela:** On 13 December 2024, Canada amended its [Venezuela regulations](#) to more effectively impose sanctions on Venezuelan perpetrators in cases of gross and systematic human rights violations, significant acts of corruption, and grave breaches of international peace and security. Also, on 13 December 2024, [Canada sanctioned](#) five current or former senior Venezuelan officials for their involvement in supporting the illegitimate election of Nicolas Maduro, noting the repression of protestors, opposition figures, civil society leaders, journalists, and election officials following the sham election. The designations align with earlier measures taken by international partners, including the [U.S.](#) These listings were the second round of sanctions imposed following a four-year gap in implementation between 2019 and 2023.
- **Lowering the Threshold for Criminal Prosecutions for Sanctions Offenses:** On 18 September 2024, new [amendments](#) to the Canadian Criminal Code came into effect, which lowered the threshold (the mental element) for Canadian citizens abroad and persons within Canada to face legal consequences for sanctions violations. Violations of sanctions could previously only be punished if the mental element of the offence is knowledge or intention. The Code now explicitly permits [courts to infer](#) from circumstantial evidence that the accused knew or was reckless as to whether they were violating sanctions if the accused showed a “markedly unusual” pattern of behaviour with regard to the property or general business activities of the accused that is inconsistent with lawful activities. There have not been [any successful criminal prosecutions](#) under the Sergei Magnitsky Law or SEMA for violations of Magnitsky-style sanctions. Additionally, recent amendments have expanded the due diligence obligations imposed on Canadian businesses in relation to sanctions compliance.
- **Imposing New Reporting Obligations on Private Actors:** On 19 August 2024, [amendments](#) to the [Proceeds of Crime \(Money Laundering\) and Terror Financing Act \(PCMLFTA\)](#) took effect, which imposed new obligations to report potential sanctions evasion offences for importers and exporters, and for other private sector actors who are designated as [reporting entities](#). The amendments place a greater due diligence burden on private sector actors to ensure that designated actors cannot evade Canadian sanctions.
- **Creating an Administrative Monetary Penalty Regime:** The [amendments](#) to the [PCMLFTA](#) also authorised the [Canadian government](#) to issue regulations imposing administrative monetary penalties for importers and exporters who fail to declare that goods are related to sanctions evasion. [Reporting entities](#) who fail to meet their new obligations may also be subject to administrative monetary

penalties under an existing framework under the PCMLFTA. These amendments add administrative monetary penalties, a civil penalty with a lower threshold to prove than a criminal offense, to the sanctions enforcement framework in Canada. They thus increase the likelihood that Canadian persons who violate sanctions will face consequences.

- **Clarifying the Procedure for Challenging Sanctions:** In *Saint-Rémy v. Canada (Attorney General)*, 2024 FC 1380, the Federal Court held that designated persons who want to challenge their designation for sanctions must first apply to the Minister of Foreign Affairs for delisting, following an administrative process set out under the JVCFOA and regulations issued under SEMA, before they seek judicial review. This case was the only challenge of a designation under Magnitsky-style sanctions in the courts during this period. However, the Court had reached the same conclusion in *Mobile Telesystems Public Joint Stock Company v. Canada (Attorney General)*, 2024 FC 1237. In that case, the applicant had been designated in relation to a grave breach of international peace and security.
- **Still No Successful Challenge to Magnitsky-style sanctions designation in the Courts:** In *Saint-Rémy v. Canada (Attorney General)*, 2024 FC 1380, the applicant, who was sanctioned for significant corruption under the SEMA (Haiti) Regulations, sought judicial review of the listing decision. His application was struck on a motion by the Attorney General. To date, no designated person has successfully challenged a designation in a Canadian court.

AUSTRALIA UPDATES: NOTABLE DEVELOPMENTS AND PATTERNS OF USE

- **Joining Global Efforts to Sanction Violent Israeli Settlers:** On 25 July 2024, Australia sanctioned seven individuals and one entity for the ill-treatment of Palestinians in the West Bank. All individuals were identified as Israeli settlers involved in violent attacks on Palestinians and the entity designated is a known Israeli settler youth group responsible for inciting and perpetrating violence against Palestinian communities. At the date of designation, each target had already been designated in at least two—if not all—of the following jurisdictions: the U.S., UK, EU or Canada. These designations highlighted the importance of multilateralisation and aligned Australia with like-minded jurisdictions to tighten the net on impunity.
- **Continuing to Hold Iran to Account for Human Rights Violations:** On 16 September 2024, marking the second anniversary of the incarceration and tragic death of Mahsa Jina Amini, Australia sanctioned five Iranian individuals for human rights abuses. The individuals sanctioned include senior security and law enforcement officials who were complicit in the violent repression of protests in Iran.
- **Continued Pressure on Myanmar Military Forces:** On 19 September 2024, Australia relisted five individuals deemed current or former military officers of the rank of Brigadier-General or higher in the Myanmar military.
- **Targeting Cybercrime and Malicious Cyber Activity:** On 2 October 2024, Australia imposed sanctions on three Russian citizens for their senior involvement in the Russian cybercrime syndicate, Evil Corp cybercrime group, as well as its precursor groups and subgroups. These designations formed part of a coordinated strategy with the UK and the U.S. to deter and respond to malicious cyber activity and marks the third use of Australia's autonomous cyber sanctions since the framework's enactment.

- **Co-ordinated Efforts to Reduce Escalation of Regional War:** On 15 October 2024, Australia sanctioned five Iranian citizens contributing to Iran’s missile program, deemed by the Australian government as a “material threat” to regional and international security. The sanctions were a coordinated effort with the UK and the U.S. in response to Iran’s launch of over 180 ballistic missiles against Israel on 1 October 2024.

NEW RESOURCES AND MEDIA FROM THE GLOBAL MAGNITSKY SANCTIONS COALITION

- **U.S. Global Magnitsky and Related Sanctions: Mid-Year Update January 1, 2024 – June 30, 2024:** Human Rights First published a report tracking designations and trends in the Global Magnitsky, Section 7031(c), and other sanctions and visa restriction programs relating to human rights abuses and corruption in the first half of 2024.
- **Bahraini Prince Nasser Still Feted in U.S. Despite Torture Allegations:** Brian Dooley discusses Human Rights First’s sanction recommendation against Bahraini Prince Nasser for credible allegations of torture, and the U.S. government’s continued failure to impose Section 7031(c) visa restrictions against him.
- **Magnitsky Sanctions and Political Prisoners: Lessons from the Case of Vladimir Kara-Murza:** In a *Just Security* op-ed, Human Rights First’s Nina Moraitou-Politz reviews the multilateral reach of sanctions in the arbitrary detention of Vladimir Kara-Murza, their impact, and what further actions could help governments better address such detentions.
- **Sanctioning Human Trafficking Under the Global Magnitsky Program:** In a *Just Security* op-ed, Human Rights First discusses the standards used to date for human trafficking sanctions by the U.S. government under its Global Magnitsky program, and why nonviolent forms of trafficking should also be considered sanctionable.
- **Mobilizing Action for Political Prisoners: Using Magnitsky Sanctions and Other Tools to Seek Their Release:** In this Magnitsky Month event, panellists Evgenia Kara-Murza, Richard Ratcliffe, and Angelita Baeyens discuss how civil society can advocate for the release of those arbitrarily detained and mobilize collective global action. A recap of the panel discussion is available [here](#).
- **New Precedents, Persistent Gaps, and What’s Next: Looking Back on Global Magnitsky Sanctions under the Biden Administration and What to Expect from the New Administration:** In this Magnitsky Month event, panellists Brad Brooks-Rubin, Chloe Zoeller, and Natalia Kubesch reflect on what the Biden administration achieved, and where it fell short in its use of Magnitsky sanctions and identify potential changes in human rights and anticorruption sanctions the Trump administration might pursue.
- **Testimony before the U.S. Senate Committee on Foreign Relations: Implementation of the Global Magnitsky Laws:** Human Rights First’s Adam Keith testified on the U.S. government’s use of Global Magnitsky sanctions in the first congressional hearing dedicated to assessing their implementation. A recording of the hearing, featuring testimony from the Global Magnitsky Justice Campaign’s Sir William Browder, is available [here](#).

- **UK Targeted Sanctions Quarterly Update: 9 May – 6 November 2024:** REDRESS published a briefing providing an overview of recent developments in the UK's use of targeted sanctions between 9 May 2024 and 6 November 2024.
- **Repurposing the £783,827.34 Recovered from Petr Aven for Survivors of the War in Ukraine:** REDRESS published a briefing urging the UK government to re-direct the £783,827 recovered from sanctioned Russian oligarch Petr Aven to support survivors of the conflict in Ukraine.
- **Recovering UK Assets Linked to Sanctions Violations As Reparations:** REDRESS published a briefing proposing that fines and penalties imposed by UK enforcement for sanctions violations could be used to fund reparations for survivors of serious human rights abuses, humanitarian law violations, and corruption. It reviews recent UK sanctions enforcement cases, demonstrating how recovered assets and fines could be redirected to support survivors.
- **Financial Accountability at the International Criminal Court:** REDRESS published a report exploring how the asset recovery mechanisms of the ICC can be deployed to obtain financial recovery for survivors of international crimes. It also provides guidance for national stakeholders on how to respond to, and implement, requests for cooperation by the Court to recover the assets of persons accused of international crimes.

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 RAOUL WALLENBERG CENTRE FOR HUMAN RIGHTS

The Raoul Wallenberg Centre for Human Rights is a unique international consortium of parliamentarians, scholars, jurists, human rights defenders, NGOs, and students united in the pursuit of justice, inspired by and anchored in Raoul Wallenberg's humanitarian legacy. 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/>



**OPEN SOCIETY
FOUNDATIONS**

