



## Russia Sanctions Amendment Regulations (No 3) 2025

Cindy Kiro, Governor-General

### Order in Council

At Wellington this 16th day of June 2025

Present:

Her Excellency the Governor-General in Council

These regulations are made under section 9 of the Russia Sanctions Act 2022—

- (a) on the advice and with the consent of the Executive Council; and
- (b) on the recommendation of the Minister of Foreign Affairs made in accordance with section 8 of that Act.

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## Regulations

### 1 Title

These regulations are the Russia Sanctions Amendment Regulations (No 3) 2025.

### 2 Commencement

- (1) These regulations come into force on 19 June 2025.
- (2) However, regulation 6 comes into force on 17 July 2025.

### 3 Principal regulations

These regulations amend the Russia Sanctions Regulations 2022.

### 4 Regulation 8 amended (Ships not to enter ports in New Zealand)

- (1) In regulation 8(1), replace “either” with “1 or more”.
- (2) After regulation 8(1)(b), insert:

(c) the ship is listed in Schedule 6.

### 5 Regulation 11 amended (Prohibition on dealing with services)

Replace regulation 11(3)(c)(i) with:

- (i) both of the following apply:
  - (A) the price of the oil in the most recent transaction before the oil passes through customs control of a country (other than Russia) does not exceed the specified unit price:
  - (B) the ship transporting the oil is not a ship listed in Schedule 6; or

### 6 Regulation 12 amended (Sanctions on assets and services do not apply in certain circumstances)

Replace regulation 12(7)(b) with:

- (b) if the New Zealand person is a lawyer, for the purpose of providing legal services—
  - (i) in connection with the Act or these regulations; or
  - (ii) in relation to a proceeding before a New Zealand court or tribunal (whether the proceeding has commenced or is reasonably in contemplation); or
  - (iii) in relation to the conduct of a mediation, conciliation, or arbitration in New Zealand; or
- (ba) if the New Zealand person is authorised to practise as a member of the legal profession in a jurisdiction outside New Zealand, for the purpose of

providing services that correspond with those specified in paragraph (b) in that jurisdiction; or

(bb) if the New Zealand person is suitably qualified to act as a mediator, conciliator, or arbitrator in New Zealand or outside New Zealand, for the purpose of acting in that role in the jurisdiction in which they are qualified to act; or

**7 Part 1 of table in Schedule 2 amended**

In Schedule 2, table, Part 1, insert in their appropriate alphabetical order the items set out in Part 1 of Schedule 1 of these regulations.

**8 Part 2 of table in Schedule 2 amended**

In Schedule 2, table, Part 2, insert in their appropriate alphabetical order the items set out in Part 2 of Schedule 1 of these regulations.

**9 New Schedule 6 inserted**

After Schedule 5, insert the Schedule 6 set out in Schedule 2 of these regulations.

## Schedule 1

### New items inserted into table in Schedule 2

rr 7, 8

Schedule 1 Part 1: editorial correction made by the PCO, on 11 July 2025, under sections 86(1) and 87(1)(i) of the Legislation Act 2019 (2019 No 58).

#### Part 1

##### Further entities that are sanctioned

Iran Aircraft Manufacturing Company	rr 8, 9, 10, 10A, 11
Islamic Republic of Iran Shipping Line Group	rr 8, 9, 10, 10A, 11
Joint Stock Company Kalashnikov Concern	rr 8, 9, 10, 10A, 11
Joint Stock Company Legmash Plant	rr 8, 9, 10, 10A, 11
Limited Liability Company Aeroscan	rr 8, 9, 10, 10A, 11
Public Joint Stock Company Yakovlev	rr 8, 9, 10, 10A, 11
UAVHeli	rr 8, 9, 10, 10A, 11

#### Part 2

##### Further individuals who are sanctioned

Aleksandr Vyacheslavovich Zakharov	rr 7, 8, 9, 10, 10A, 11
Ali Shadmani	rr 7, 8, 9, 10, 10A, 11
Kim Jong-Sik	rr 7, 8, 9, 10, 10A, 11
Kim Su-Gil	rr 7, 8, 9, 10, 10A, 11
Mohammad Reza Modarres Khiabani	rr 7, 8, 9, 10, 10A, 11
Nikita Aleksandrovich Zakharov	rr 7, 8, 9, 10, 10A, 11
O Yong-Ho	rr 7, 8, 9, 10, 10A, 11
Pak Jong-Chon	rr 7, 8, 9, 10, 10A, 11
Vladimir Vladimirovich Chudakov	rr 7, 8, 9, 10, 10A, 11
Vladislav Nikolaevich Pavlenko	rr 7, 8, 9, 10, 10A, 11

**Schedule 2**  
**New Schedule 6 inserted**

r 9

**Schedule 6**  
**Prohibited ships**

rr 8(1)(c), 11(3)(c)(i)(B)

**International Maritime Organization ship identification number**

9243148  
9281011  
9282479  
9285835  
9286657  
9288693  
9288710  
9288722  
9288746  
9288899  
9296391  
9299898  
9317949  
9318539  
9321689  
9331141  
9332781  
9332810  
9333424  
9333436  
9353096  
9411020  
9412359  
9413573  
9418494  
9610810  
9953523

Rachel Hayward,  
Clerk of the Executive Council.

## Explanatory note

*This note is not part of the regulations but is intended to indicate their general effect.*

These regulations amend the Russia Sanctions Regulations 2022 (the **principal regulations**). The regulations come into force on 19 June 2025, except *regulation 6*, which comes into force on 17 July 2025.

All the amendments fulfil the purpose of the principal regulations, which is to give effect to the Russia Sanctions Act 2022 by imposing sanctions in response to Russia's military actions in relation to Ukraine (and in response to any assistance given to Russia from any other country or person in connection with those actions).

*Regulation 4* amends the principal regulations to prohibit ships specified in *new Schedule 6* (the **specified ships**) from entering a port in New Zealand.

*Regulation 5* amends the principal regulations to ensure that certain services in relation to the transport of oil of Russian origin by the specified ships remain prohibited irrespective of that oil's price.

The specified ships are ships that form part of Russia's shadow fleet and are involved in the transport of Russian oil.

*Regulation 6* replaces regulation 12(7)(b) of the principal regulations, which enables New Zealand lawyers to provide certain legal services despite the sanctions imposed in the principal regulations. This exception is expanded to enable—

- a New Zealand person, whether qualified as a lawyer in New Zealand or overseas, to provide legal services in the jurisdiction in which they are qualified in a wider range of matters, including court proceedings; and
- a New Zealand person to act as a mediator, conciliator, or arbitrator in the jurisdiction in which they are qualified, whether in New Zealand or overseas.

*Regulations 7 and 8* add the names of entities and individuals to Schedule 2 of the principal regulations so that the sanctions regime applies to them. Those entities and individuals are—

- actors contributing to Russia's military-industrial complex through the production, purchase, distribution, or research of critical technologies and equipment; and
- actors from the Democratic People's Republic of Korea that have provided military assistance to Russia's invasion of Ukraine; and
- actors from Iran that have facilitated the production or transfer of military equipment for Russia's invasion of Ukraine.

Issued under the authority of the Legislation Act 2019.

Date of notification in *Gazette*: 18 June 2025.

These regulations are administered by the Ministry of Foreign Affairs and Trade.