



NEW ZEALAND
FOREIGN AFFAIRS & TRADE
Manatū Aorere

Russia Sanctions Regulatory Charter 2023





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Chief Executive's foreword

On 24 February 2022, Russia's illegal and unprovoked invasion of Ukraine sent shock waves around the world. The international community was quick to condemn Russia, a permanent member of the United Nations Security Council, for its actions and the damage caused not only to Ukraine but to the rules-based order. The conflict has also triggered inflation and created food supply challenges for many countries, including developing nations.

Aotearoa New Zealand was quick to join others in condemning Russia's errant behaviour. Our Parliament's unanimous vote to pass the Russia Sanctions Act on 9 March 2022 was the clearest possible signal of New Zealand's concern. Since then, we have implemented successive tranches of sanctions and put in place a fit-for-purpose regulatory system to ensure they are managed soundly. Our goal in March 2022 remains – to deploy sanctions to express our condemnation and exert pressure on Russia, and its supporters, to change course.

Sanctions are designed to limit Russia's ability to wage war through restricting economic relations and trade, and are most effective when they complement or reinforce sanctions by other countries. Accordingly, our sanctions are aligned with those of like-minded countries including Australia, Japan, the United Kingdom, the European Union, and the United States.

While sanctions may not have stopped this illegal war, they are having an impact on Russia and one which will increase over time as their effect is cumulative. While New Zealand has less direct exposure and dealings with Russia than some other countries, by playing our part we are helping to increase pressure on Russia.

The Russia sanctions system is a new one for New Zealand, never having had a country-specific sanctions regime until now. As steward of the regime, the Ministry of Foreign Affairs and Trade has worked quickly, with support from across government agencies, to stand up a regulatory system that is fit-for-purpose and enduring. I would like to acknowledge the generous spirit shown by our colleagues across the public sector in providing their expertise and resources in the sanctions effort.



Engagement and cooperation with a group of like-minded partners on the approach to sanctions has been invaluable and will continue to be useful as we grapple with future challenges, including sanctions evasion and potential breaches.

As this new system embeds, we continue to look for opportunities for continuous improvement including through engagement with regulated communities and the business sector to understand how the system is working in practice. We have made adjustments and are ready to make more as the system settles down.

Our aim as a good regulatory steward is to provide information and support to help regulated people understand their obligations and to reinforce shared ownership by those with policy or operational functions in the system. While sanctions are intended to have a negative impact on those sanctioned, we are ever mindful of ensuring they don't have a disproportionate impact on New Zealanders and their businesses.

By actively preventing New Zealanders from having dealings with sanctioned persons, assets and services, we can ensure that as a nation we do not support, whether inadvertently or not, Russia's illegal invasion of Ukraine.

This regulatory charter is part of the Ministry's effort to explain the sanctions regime to regulated communities and interested New Zealanders.

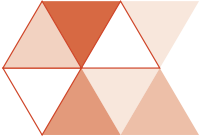
Chris Seed
Chief Executive and Secretary of
Foreign Affairs and Trade



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Context: Regulatory charters



Why have a regulatory charter

In New Zealand, **regulatory stewardship** is a statutory obligation under the Public Sector Act 2020. Chief Executives are responsible for stewardship of the **legislation** administered by their agency.

A good regulatory steward will provide information and support to help regulated people understand their obligations and to reinforce shared ownership by those with policy or operational functions under the system. In addition, the steward's goal is to monitor and care for the system of formal and informal rules, norms, procedures and penalties to ensure the system remains fit-for-purpose over the long term.

This **regulatory charter** is a management tool designed to support these goals.

What is in this regulatory charter

This regulatory charter:

- Sets out what the system is intended to achieve
- Outlines the approach taken to achieve the regulatory purpose
- Describes the impact of the system on those regulated by it
- Describes the roles and functions of the agencies involved in the system

This Charter informs New Zealanders and those operating in New Zealand, how to comply with the law.

It also describes how the core agencies involved in the system will implement and steward the system together. The agencies will work collaboratively across their respective roles and functions to monitor and improve the regulatory system.

Charter ownership

This Charter has been developed by the Ministry of Foreign Affairs and Trade (MFAT) with the following agencies - Crown Law Office (CLO), Department of Internal Affairs (DIA), Financial Markets Authority (FMA), Immigration New Zealand (INZ), Ministry of Transport (MoT), New Zealand Customs Service (Customs), New Zealand Police (Police), Overseas Investment Office (OIO), and Reserve Bank of New Zealand (RBNZ).

Ownership and oversight of the Charter sits with the core agencies listed above, who meet regularly as the Russia Sanctions Governance Group (SGG), a coordinating forum for sharing information, aligning priorities and operational functions, and monitoring the system.

Charter review and management

MFAT is responsible for maintaining this Charter, in consultation with the other core agencies. As the regulatory system is continuously improved to meet evolving situations, address risks and close gaps, MFAT will ensure the Charter is kept up to date to reflect these changes.

In addition, the Minister of Foreign Affairs will commence a statutory review of the operation and effectiveness of the Russia Sanctions Act 2022 around March 2024, two years after it commenced. The Charter will then be updated to reflect the outcomes of the review.



Background: Russia sanctions



The Russia Sanctions Act and related regulatory system

The [Russia Sanctions Act 2022](#) (the Act) establishes a framework for New Zealand to ‘impose and enforce sanctions in response to military actions by Russia (and by countries or persons who may be assisting Russia)’¹.

The regulatory system created under the Act aims to prohibit or restrict activity inside and outside of New Zealand by those with specific connections to Russia or the conflict. This is done in order to exert pressure on Russia (or another country assisting Russia) by limiting its ability to finance the war, or to complement and reinforce sanctions by other countries.

New Zealand’s sanctions cover a range of measures, and target a number of individuals and entities. MFAT, as steward of the Act, publishes regularly updated public information and maintains a [Russia Sanctions Register](#) to help New Zealanders comply with the sanctions. The Act and its regulations apply to all New Zealanders, wherever they are in the world, as well as all individuals and businesses operating in New Zealand.

For more information on the Russia sanctions see MFAT’s webpage [here](#).

Why sanctions are important

The use of sanctions is an important way for New Zealand to demonstrate our condemnation of Russia’s illegal invasion of Ukraine. As a small country that depends on the international rules-based system for security and prosperity, it is fundamental to New Zealand that these rules are protected, and that violations can be punished.

As Russia has been able to veto the use of sanctions at a multilateral level, creating a country specific sanctions regime enables New Zealand to signal our position and ensures we have a practical avenue for penalising Russia. By aligning our sanctions with like-minded countries (such as Australia, Japan, the United Kingdom, countries in the European Union, the United States and Canada), New Zealand is able to exert greater pressure than would be possible on our own. It also ensures New Zealand does not become an alternative offering to Russia as sanctions by other countries lock them out of certain activities and trade.

Our sanctions system will only be effective when properly implemented. A robust regulatory system allows New Zealand to monitor the compliance and enforcement of measures (and therefore the effectiveness of our system). It also allows for flexibility when needed, and keeps the legislative tools sharp, given the fluid situation in Ukraine and the international community’s evolving response.

The intent of the sanctions regime is to punish and influence Russia, however the Government is also conscious of the potential impacts sanctions can have on New Zealanders around the world and those in, or doing business in, New Zealand. For this reason sanctions regulations are implemented and managed to enable mitigation of these impacts where appropriate.

1 Section 3 Russia Sanctions Act 2022



Other countries' sanctions may impact New Zealanders

Many countries already have sanctions in place. These may impose restrictions on your activities beyond those imposed by the New Zealand Russia Sanctions Act. Compliance with the New Zealand sanctions does not automatically ensure compliance with other countries' sanctions.

If you do business with Russia, we recommend you also review other countries' sanctions. Find out more about the sanctions imposed on Russia by our like-minded partners:

- [Australia](#)
- [Canada](#)
- European Union
 - » [Sanctions adopted following Russia's military aggression against Ukraine](#)
 - » [EU restrictive measures against Russia over Ukraine \(since 2014\)](#)
- [Japan](#)
- [Switzerland](#)
- [United Kingdom](#)
- United States
 - » [Sanctions and Export Controls on Russia](#)
 - » [Office of Foreign Assets Control – Sanctions Programs and Information](#)



Scope and objectives





Scope of the system

The Russia Sanctions regulatory system consists of the legislation and regulations that outline and enforce New Zealand's unilateral sanctions against Russia (or, in specific circumstances, third parties).² This includes the:

- [Russia Sanctions Act 2022](#)
- [Russia Sanctions Regulations 2022](#)
- [Immigration Act 2009](#)
- [Customs and Excise Act 2018](#)

It also covers the activities undertaken by government agencies, entities, and individuals in compliance or enforcement of the sanctions, including duty holders as defined within the Act.³

Duty holders are those who are defined as reporting entities under the Anti Money Laundering and Countering Financing of Terrorism Act 2009 (the AML/CFT Act) and also traders who buy or sell items such as jewellery, artistic or cultural artefacts, motor vehicles or ships over the value of \$10,000.

As noted above, the Act and its regulations apply to all New Zealanders and New Zealand businesses, ships and aircraft, wherever they are in the world, as well as all individuals and businesses operating in New Zealand.

Objectives of the system

Given the purpose of the Act and the importance of collective action to put pressure on Russia, New Zealand needs to maintain a sound and effective regulatory system. A well-functioning sanctions system will be more effective in punishing Russia and exerting influence and pressure on those enabling Russia to wage war in Ukraine.

An effectively regulated sanctions system will enable New Zealand to implement sanctions that complement those of our international partners. It will consequently enhance our international reputation while maximising the impact of the global sanctions effort.

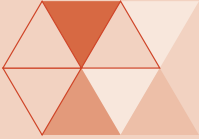
The objectives of the regulatory system are to:

- Impose and enforce sanctions in response to military actions by Russia (and by countries or persons who may be assisting Russia) to demonstrate New Zealand's condemnation.
- Reduce the risk that New Zealand individuals and businesses may breach sanctions or be used to evade sanctions.
- Ensure New Zealand is not perceived as a soft route to evade sanctions imposed by other countries.
- Ensure any non-compliance, breaches or evasions are dealt with swiftly and effectively by making best use of New Zealand's existing regulatory and enforcement frameworks.
- Manage, as appropriate, disproportionate impacts on New Zealand individuals and businesses.

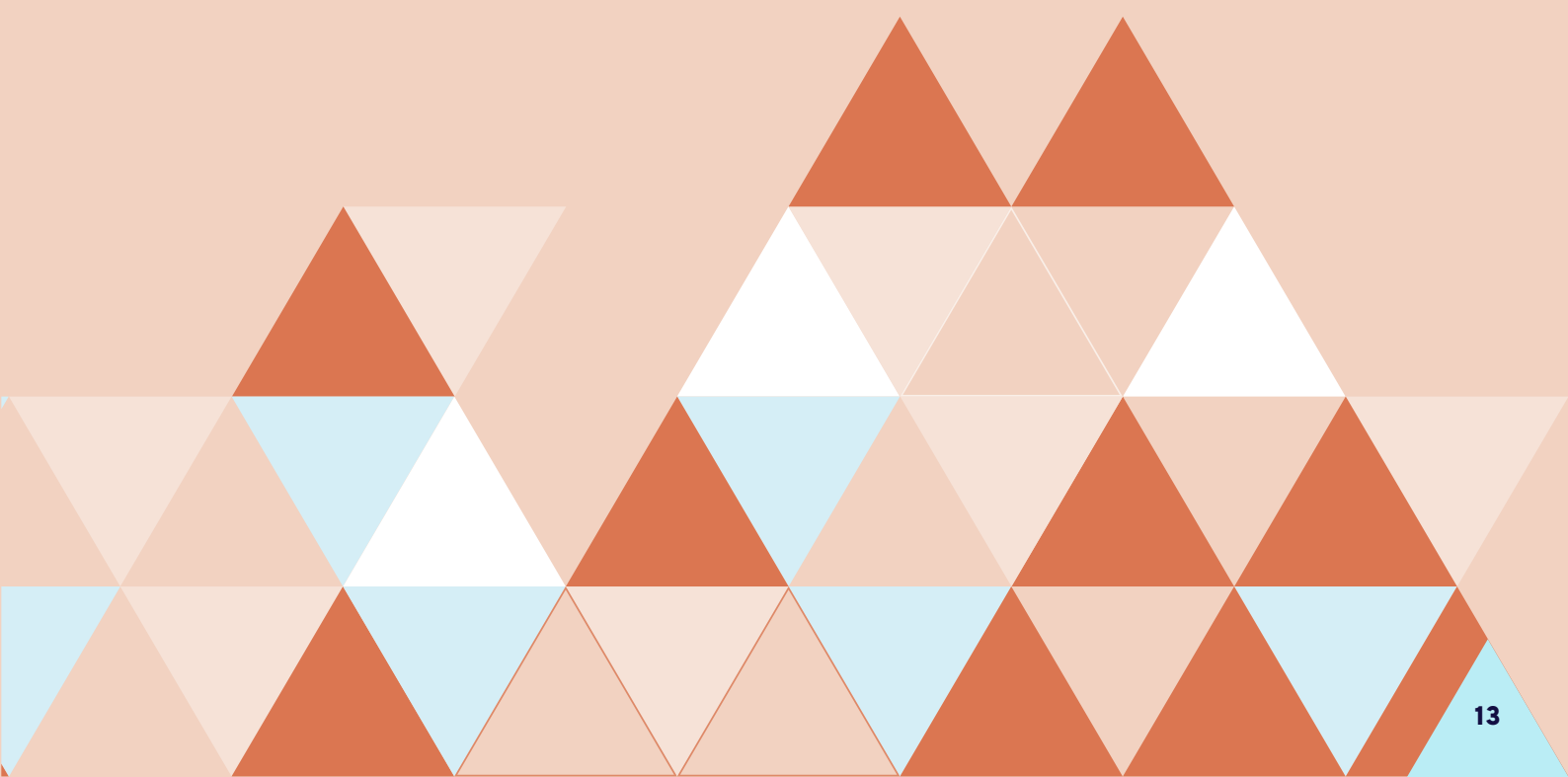
The aim, alongside other countries' sanctions, is to create a system that pressures Russia, and others that support Russia, to change course without the need to use armed force, and to ensure that no New Zealander or New Zealand business supports (advertently or inadvertently, directly or indirectly) Russia's invasion.

² The purpose of the Act is to enable New Zealand to impose and enforce sanctions in response to military actions by Russia (and by countries or persons who may be assisting Russia).

³ See Section 5, Russia Sanctions Act 2022.



Regulatory approach



Overview

Prior to the Russia Sanctions Act being created, New Zealand had a limited trading relationship with Russia and comparatively low numbers of Russian assets, persons, organisations, ships and aircraft located or active in New Zealand. The risk of a sanctions breach was therefore assessed as relatively low.

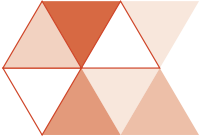
As a result, the approach taken in designing the regulatory system to support regulated communities compliance with sanctions is 'Informed Compliance' and includes four main pillars:

- Providing easy-to-access **information and guidance and responsive communications** that supports voluntary self-compliance.
- **Monitoring of reporting** by duty holders and others to obtain valuable information on how the system is working, and **information-sharing** across government and internationally.
- A graduated, **risk-based approach to enforcement** where the response is proportionate to the nature of the breach, the behaviour involved and the risk to the effectiveness of the system.
- **Continuous improvement**, so that lessons learned – for example in relation to compliance, breaches, evasions, outreach and enquiries – are incorporated swiftly into an evolving system.

Figure 1: Russia Sanctions Regulatory Approach



* The statutory review of the AM LCFT Act proposes expanding the purpose of the Act to include financial sanctions, if this change is implemented additional monitoring powers would be included



Self-compliance supported by information and guidance

The underlying principle of a self-compliance model is that regulated communities want to do the right thing. To enable this, the system needs to provide easy to understand and transparent information and guidance to help the public be aware of the sanctions system and know how to comply. The goal is to help New Zealanders comply with the sanctions and ensure they are not helping others to evade the sanctions; deliberately or inadvertently.

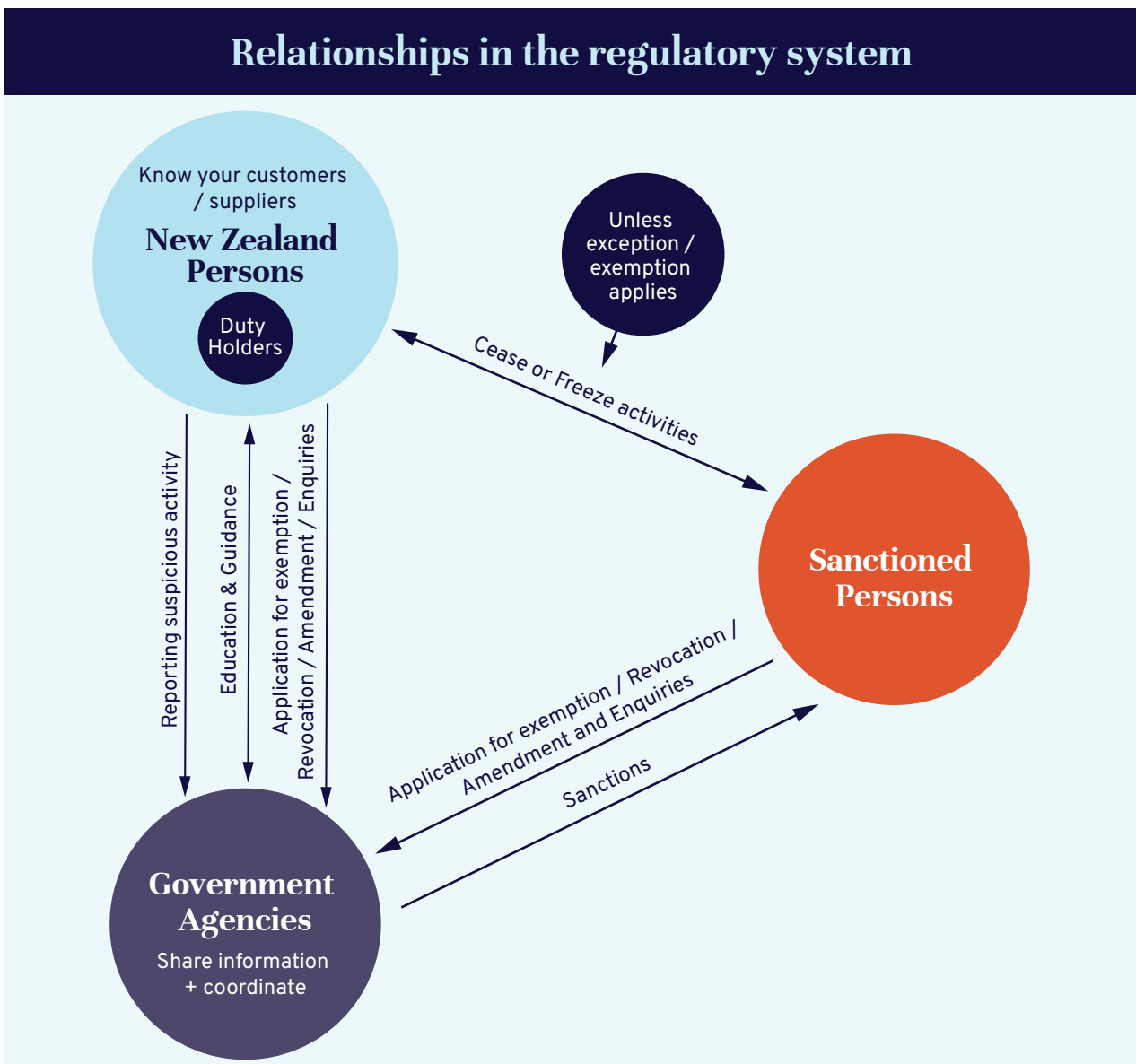
How do I comply with the sanctions?

To comply with the Russia sanctions, New Zealanders need to know:

- What is a sanction?
- Who is sanctioned?
- Which activities are prohibited or restricted?
- How they can comply?
- How does reporting work?

Guidance material and online resources have been created to explain the answers to these questions. This information is available [on the MFAT website](#).

Figure 2: Sanctions responsibilities, information flows and activities



What is a sanction?

A sanction is a prohibition or a restriction on New Zealanders' activities with sanctioned individuals, entities or assets. For example, if a sanction has been imposed, then New Zealand persons and businesses must cease their prohibited activities with the sanctioned person, entity or asset.

Prohibited activities may include services and comprehensive trade measures that impact exports or imports of some goods.

Common sanctions measures are:

- Restrictions on trade in goods and services.
- Restrictions on engaging in commercial activities.
- Targeted financial sanctions (including asset freezes) on individuals and entities.
- Travel bans on individuals.

Who is sanctioned?

The sanctions apply to individuals and entities, for example:

- Political or military figures or companies (mostly from Russia, but also as of January 2023 Belarus and Iran)
- Certain high net worth individuals (known as oligarchs)
- Most major Russian-owned banks and financial institutions
- Russian armed forces including militia
- A variety of state-owned enterprises and companies closely linked to Russian strategic and cyber industries.

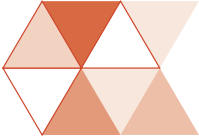
What else is sanctioned?

Sanctions also apply to:

- Russian and Belarusian vessels and aircraft.
- Certain luxury goods of Russian origin.
- Imports of Russian origin gold.
- Imports of Russian origin coal, oil and gas.
- Imports of Russian origin goods attract a 35% tariff.
- Exports of certain strategic goods to Russia or Belarus is prohibited.
- Oil and oil exploration products cannot be exported to Russia.

Are associates and relatives sanctioned?

The use of associates and relatives is a common way to evade sanctions so sanctions also generally apply to **associates** and some **relatives** of sanctioned persons.



How do I know what and who is sanctioned?

To comply with the regulations, New Zealand individuals, businesses and organisations will need to make sure they are not doing business with persons or entities that are subject to sanctions. Understanding who your customers and suppliers are, and who owns or controls them, is key.

For duty holders (defined as reporting entities under the under the AML/CFT Act) the policies, processes and controls used in conducting due diligence on customers will be an important step in meeting these obligations.

The **Russia Sanctions Register** ([available here](#)) is maintained by MFAT and is a list of sanctioned individuals and entities with the types of sanction applied to them. The Register also lists trade measures, what exemptions have been granted, and is regularly updated as new sanctions are adopted. To sign up for notifications when the Register is updated, sign up via MFAT's website [here](#).

Designation notices also help to identify who is sanctioned. Designation notices are issued by the Secretary of Foreign Affairs and Trade to give additional details about who is a sanctioned individual, entity, ship or aircraft. All the designation notices are available on MFAT's [website](#). While designation notices clarify who or what is already sanctioned, for example listing individuals that fall within a sanctioned class of persons, they do not create new sanctions.

Which activities are prohibited or restricted?

The sanctions prohibit New Zealand individuals and entities from having dealings with sanctioned persons, assets, services and securities. This prevents sanctioned individuals and entities from moving their assets here, dealing with assets already here, or using our financial system to circumvent sanctions that may be imposed by other countries now or in the future.

The sanctions include a travel ban, prohibition on ships and aircraft entering New Zealand, prohibition on dealing with assets, securities and services, a number of export and import prohibitions and a 35% tariff increase on all imports from Russia.

For more information on the prohibitions, restrictions and trade measures that apply to sanctioned persons, entities and assets, read the [Act](#), the [Regulations](#) and [MFAT's guidance](#).

How do I comply?

To comply, New Zealanders must cease or freeze all prohibited activities (such as exporting or importing prohibited goods) as well as all dealings involving assets, services or securities with, or for the benefit of, sanctioned persons or entities, unless an exception applies or an exemption has been approved.

Duty holders must also report their activities related to sanctioned persons or entities – read more on this below.

What exceptions are there?

There are some **exceptions** to the sanctions that allow activities with sanctioned individuals, entities or assets to go ahead. For example, these apply for humanitarian purposes, personal or household needs, providing legal services in connection with the sanctions, preserving assets, facilitating diplomatic functions or obligations that existed prior to the sanctions. Read [Regulation 12, 14, 14B and 18](#) for more details.

Activities falling within one of the statutory exceptions are permitted and may proceed as normal. However, there may still be reporting obligations that apply to any permitted activities that are connected with sanctioned persons, entities or assets.

Applying for exemptions

For activities which are prohibited or restricted and do not fall within an exception, it is possible to apply under section 13 for an **exemption** from a sanction for a particular, specified situation. Section 13 can also be used to apply for an **amendment** or **revocation** of a regulation or designation notice.

To apply for an exemption, use the downloadable form [here](#) and email it to: sanctions@mfat.govt.nz.

Exemption applications require details including an explanation of the situation, and the reason why granting an exemption would be justified in the circumstances, for example, any harm that might result if an exemption is not granted.

Responding to enquiries

In addition to the exemption application process described above, members of regulated communities, sanctioned individuals and entities, and the public are welcome to send any enquiries about the sanctions to MFAT at sanctions@mfat.govt.nz.

MFAT will respond within 3 working days for straightforward enquiries. More complex enquiries and ones which might require consultation with other relevant government agencies may take longer.

MFAT is not able to provide legal advice so all of our responses contain general guidance related to your situation with a recommendation to seek assistance from a lawyer where required.

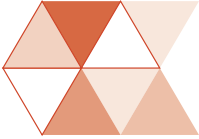
What is a breach?

If a New Zealander does something which is prohibited by the Russia sanctions, that is a breach of the sanctions which could trigger a regulatory response. Responses could include enforcement action, such as a warning, criminal prosecution or a monetary penalty.

New Zealand's relevant law enforcement agencies, such as NZ Customs, Immigration NZ or NZ Police, will consider suspected breach cases that are reported in cooperation with other enforcement and regulatory agencies.

Russia sanctions are widely publicised. New Zealanders and their businesses, particularly those operating internationally or providing higher risk products and services, should consider whether sanctions might affect their activities.

To help you avoid sanction breach activity you should think about how your business is exposed to the risks and vulnerabilities associated with sanctions, for example, know who you are dealing with.



Approach to compliance and enforcement

The likelihood of significant sanction breaches occurring in New Zealand or by New Zealanders is, in the international context, assessed as comparatively low. However, breaches will occur so it is still important that compliance and enforcement activities are undertaken, when necessary, to ensure the system is effective and to act as a deterrent.

Given the low likelihood of significant breaches occurring, our approach to compliance and enforcement is risk-based. The purpose of this risk-based approach is to make sure sanctions control measures are timely, proportionate to the circumstances, and reasonable with resources targeted towards higher risk and priority areas.

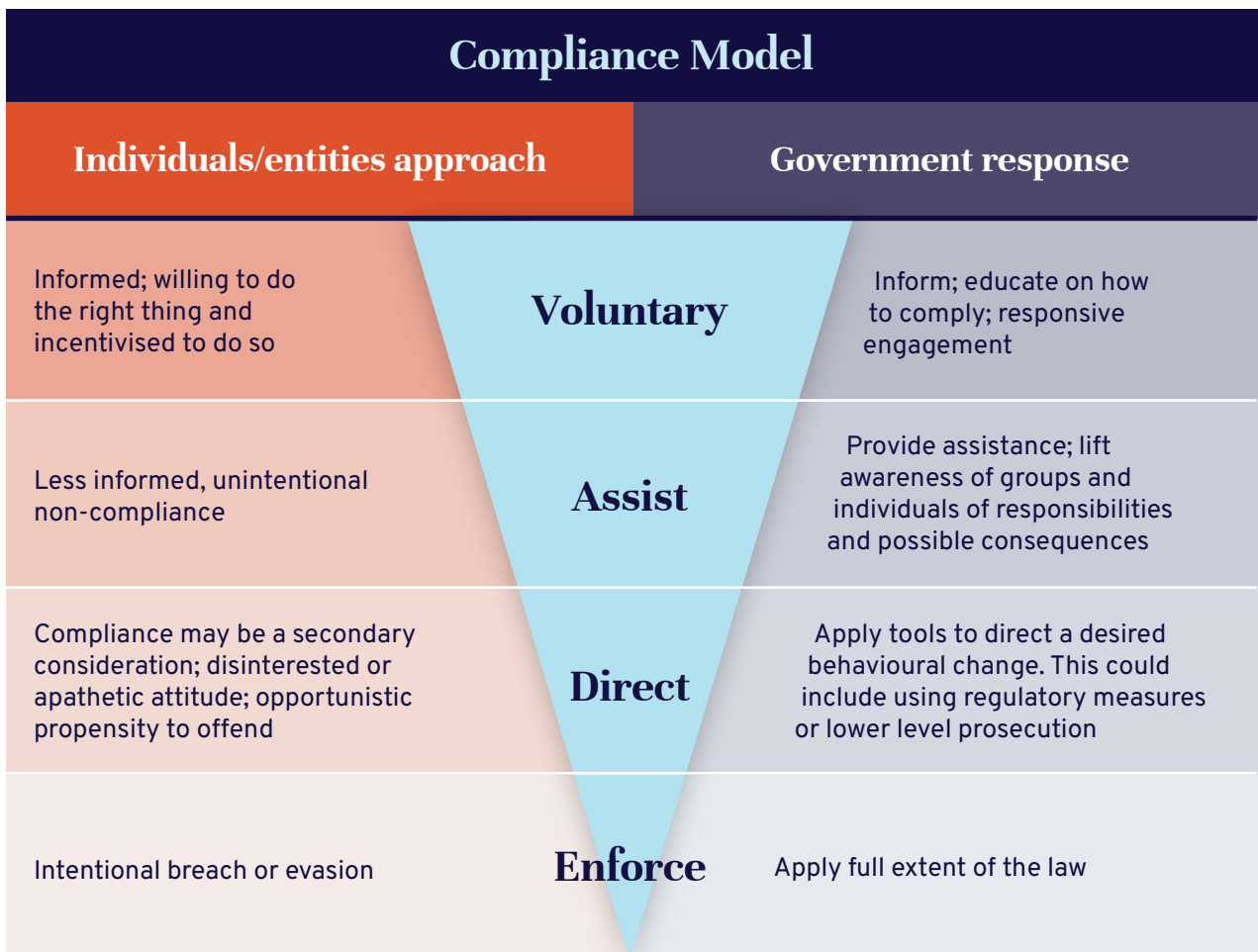
In line with a risk-based approach, the sanctions system applies a **VADE compliance model** –Voluntary, Assisted, Directed, Enforced.

The VADE model spans the full spectrum of compliance elements. The model recognises the core principle that **most people and businesses want to comply with their obligations, especially once they are aware of them and know how to comply.**

The system spans a variety of tools ranging from education and awareness, reminders and warnings, and civil enforcement action through to criminal prosecution for egregious behaviour or repeat offending.

Officials have discretion in exercising regulatory functions according to the level of non-compliance and risk presented. Within this model, effective enforcement including prosecution acts as an incentive for voluntary compliance.

Figure 3: Russia Sanctions Compliance Model



How does reporting work?

New Zealand people and businesses are encouraged to report any activities related to a sanctioned individual, entity or asset, and any suspected breach of the sanctions to authorities. This will help officials assess how the Russia sanctions system is working and to detect and deter sanctions evasions and breaches.

To lodge a report about suspicious activity, the NZ Police Financial Intelligence Unit [GoAML portal](#) can be used by duty holders, or the [Police 105](#) website for non-duty holders and members of the public, as soon as practicable.

Duty holders have a specific duty under section 15 of the Act to **report within 3 working days** if they suspect they are dealing with assets owned or controlled by, or providing services which benefit a sanctioned person or entity. Even in cases where a duty holder's activities are permitted, reporting is likely still required if a sanctioned person or their associate is involved. If a duty holder suspects that a sanctioned person may be involved, then the best course of action is to submit a report immediately.

Understanding the beneficial ownership of the legal persons or arrangements that New Zealander's deal with will help in making the decision to submit a report to the authorities. For example, who is the ultimate beneficiary of services provided or who has effective control of a customer? The principle of '**know your customer or supplier**' would be helpful in this context.

Information-sharing provisions of the Act

Given the breadth of the sanctions, and the number of government agencies involved in implementing regulations, coordination is a critical element of the sanctions regulatory system. The Act explicitly allows **information sharing between agencies** for a range of purposes, including making new regulations, sanctions or designation notices, or for compliance and enforcement purposes.

One structure established within the system to proactively facilitate information sharing is the interagency Sanctions Governance Group, which consists of MFAT, NZ Police, Crown Law, NZ Customs, Reserve Bank of New Zealand, Department of Internal Affairs, Financial Markets Authority, Immigration NZ and other agencies as needed. The group meets regularly to discuss issues relating to the implementation of the Russia sanctions system.

International coordination mechanisms have also been established with certain other countries which provide information about sanctioned persons and assets.

Privacy statement

To implement and maintain the regulatory system, MFAT may collect personal information in the course of information-sharing arrangement with agencies or to process applications for exemptions under the Act. This information can include your:

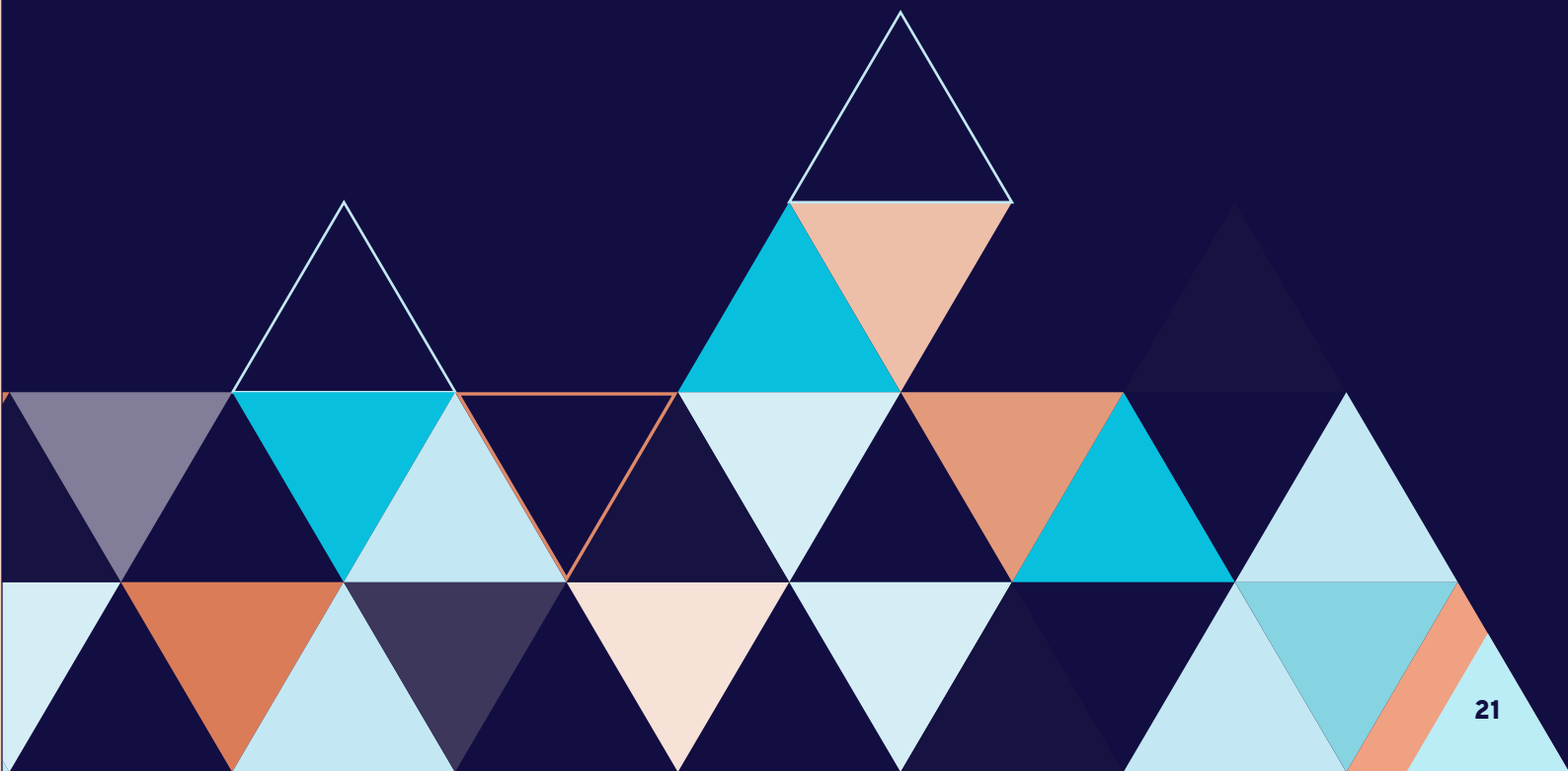
- Name
- Contact information
- Any additional personal information that you provide.

MFAT keeps your information safe by storing it in secure files and only allowing certain staff access to it.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at sanctions@mfat.govt.nz.



Roles and responsibilities



A regulatory system contains a number of different functions, each contributing to the system's desired outcomes. By clearly defining these components and roles, we can provide a basis for cooperation, resolving issues of role clarity, and for designing and implementing operational changes.

The broad set of sanctions that are in place means there are many government agencies involved. The overlapping nature of the activities and different points of entry for Russia sanctions is best illustrated with examples.



**Example 1:
An importer is looking to bring a prohibited item of Russian origin into New Zealand**

The importer seeks advice from NZ Customs regarding the Russia sanctions trade measures and requirements for importing prohibited items. NZ Customs directs the importer to MFAT and the exemption application process. The importer may choose to apply for an exemption to the import prohibition.

The exemption application is processed by MFAT as the exemption power belongs to the Minister of Foreign Affairs.



**Example 2:
Guidance is being updated for the transport sanctions**

MFAT will work with the Ministry of Transport on the change to any sanctions. If required, due to the nature of the update, the Ministry of Transport may consult with entities or industry groups that may be impacted by any changes, and then develop and issue updated guidance. MFAT would review the guidance to ensure it is legally consistent with the Act and Regulations.



**Example 3:
A report is received of suspicious financial activity that could potentially be a breach of a sanction**

The agency that receives the report will share it with NZ Police. Relevant agencies will work together as needed to consider the nature of the activity and may seek more information. NZ Police may undertake an investigation to determine if there is sufficient evidence to take further action such as a warning or prosecution.

Agencies and their roles

MFAT has stewardship responsibility for the Russia Sanctions Act and Regulations, which means that MFAT is responsible for ensuring the legislation and regulations are working. This includes coordinating with other government agencies. This is a new function for MFAT.

In most cases, the Russia sanctions operational activities are part of existing regulatory and operational systems, for example, within NZ Police, NZ Customs and Immigration NZ. MFAT is advised of any operational activities that relate to Russia sanctions and oversight is provided by the SGG cross-agency coordination group.

Table 1 outlines the roles of various government agencies.

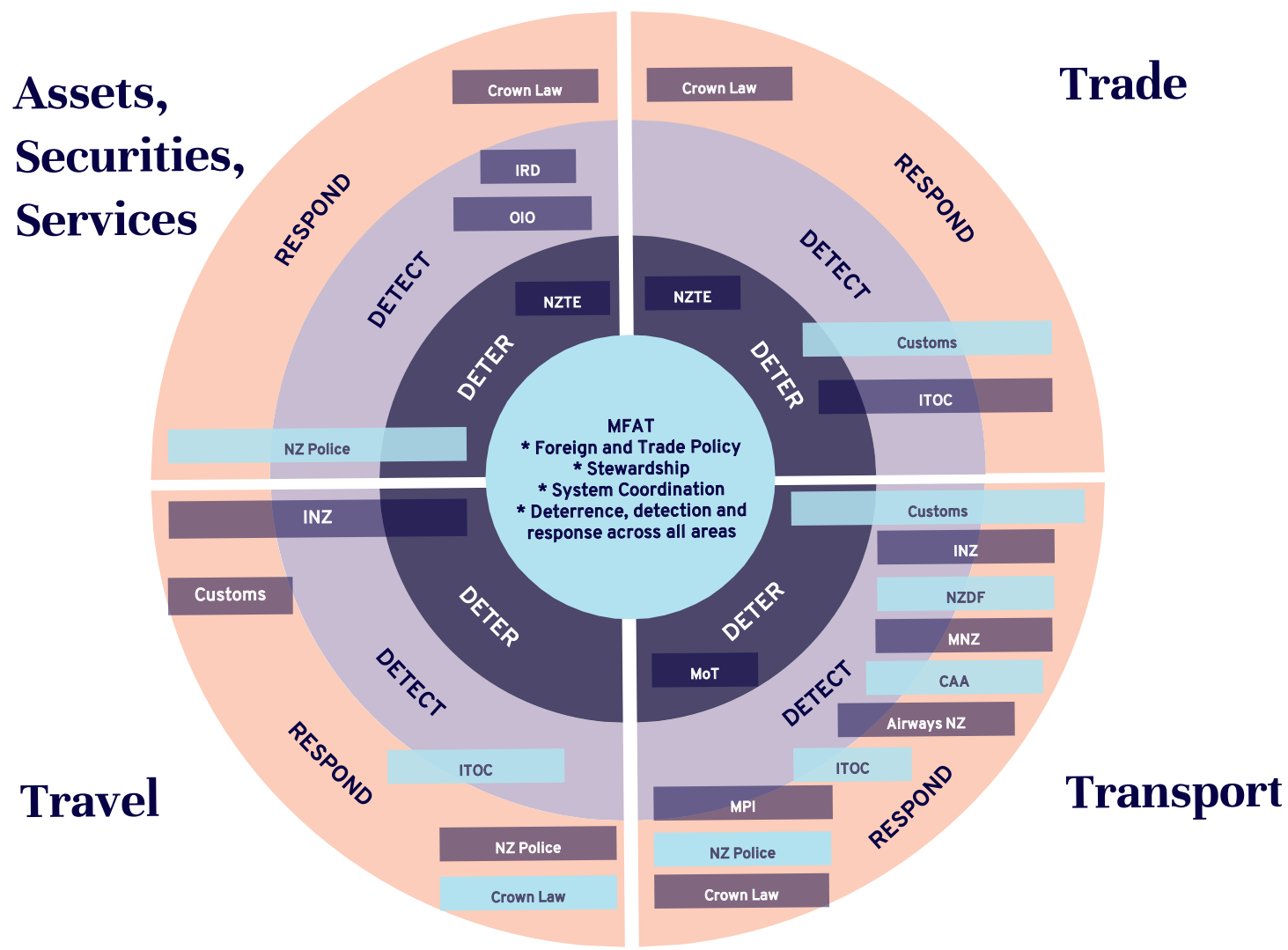


Table 1. Russia sanctions agency roles

	Agency	Role
System strategy and policy	MFAT	<ul style="list-style-type: none"> Has policy functions in relation to Russia sanctions including drafting advice on new sanctions Leads oversight of the system
	NZ Customs, Immigration NZ, Overseas Investment Office, NZ Police, MBIE, RBNZ, DIA, FMA, Treasury, others	<ul style="list-style-type: none"> Are consulted during policy-making Contributes to oversight of the system
	Ministry of Justice	<ul style="list-style-type: none"> Lead agency for coordination of Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) matters Leads the review of the scope of the AML/CFT Act to potentially include financial sanctions
Advice, education and information	MFAT	<ul style="list-style-type: none"> Produces guidance and information for regulated communities and responds to enquiries from the public
	Ministry of Transport	<ul style="list-style-type: none"> Produces guidance and information in relation to transport sanctions
	Immigration NZ	<ul style="list-style-type: none"> Produces guidance and information in relation to travel bans
	NZ Police	<ul style="list-style-type: none"> Produces guidance and information for duty holders (who have an obligation to report suspicious activity) and the public
	Others (for example MBIE, NZ Trade & Enterprise)	<ul style="list-style-type: none"> Works with MFAT to support development of guidance and enable outreach to various groups, especially those who have existing relationships with regulated communities
Delivery of services	MFAT	<ul style="list-style-type: none"> Maintains the Sanctions Register Facilitates applications for exemptions, amendments and revocations with the Minister of Foreign Affairs or a person that has been delegated powers to grant these changes Facilitates the removal of designations (people and entities) with the Minister of Foreign Affairs
Compliance and enforcement	MFAT	<ul style="list-style-type: none"> Coordination and governance of the compliance and enforcement system; information sharing with other relevant agencies Receives information from NZ Police and other agencies on suspicious sanctions related activities
	NZ Customs	<ul style="list-style-type: none"> Leads enforcement activity related to trade sanctions
	Immigration NZ	<ul style="list-style-type: none"> Leads enforcement activity related to travel bans
	NZ Police	<ul style="list-style-type: none"> Leads enforcement activity related to assets, services and securities sanctions Collects reporting on suspicious sanctions related activity
	Others (for example MBIE, NZ Trade & Enterprise)	<ul style="list-style-type: none"> Shares information in accordance with relevant legislation, including the Russia Sanctions Act Supports responses to potential sanctions breaches Undertakes secondary activity, in line with their relevant legislative powers, that support regulated community compliance with sanctions
Monitor and evaluate	MFAT	<ul style="list-style-type: none"> Monitors and evaluates policy settings Keep under review the law and practices of people that must comply with the law Monitors and evaluates operational settings and makes improvements to the system
	Others (for example MBIE, NZ Trade & Enterprise)	<ul style="list-style-type: none"> Provides information on how well the system is working, particularly those parts that they control Contributes to improvements and oversight of the system
Extending or dismantling the system	MFAT	<ul style="list-style-type: none"> Provides policy advice to Ministers on extending sanctions regulations beyond March 2025 and/or dismantling the system

Figure 4 shows how the roles of a number of agencies interact in ensuring compliance with sanctions, based on the type of sanction.

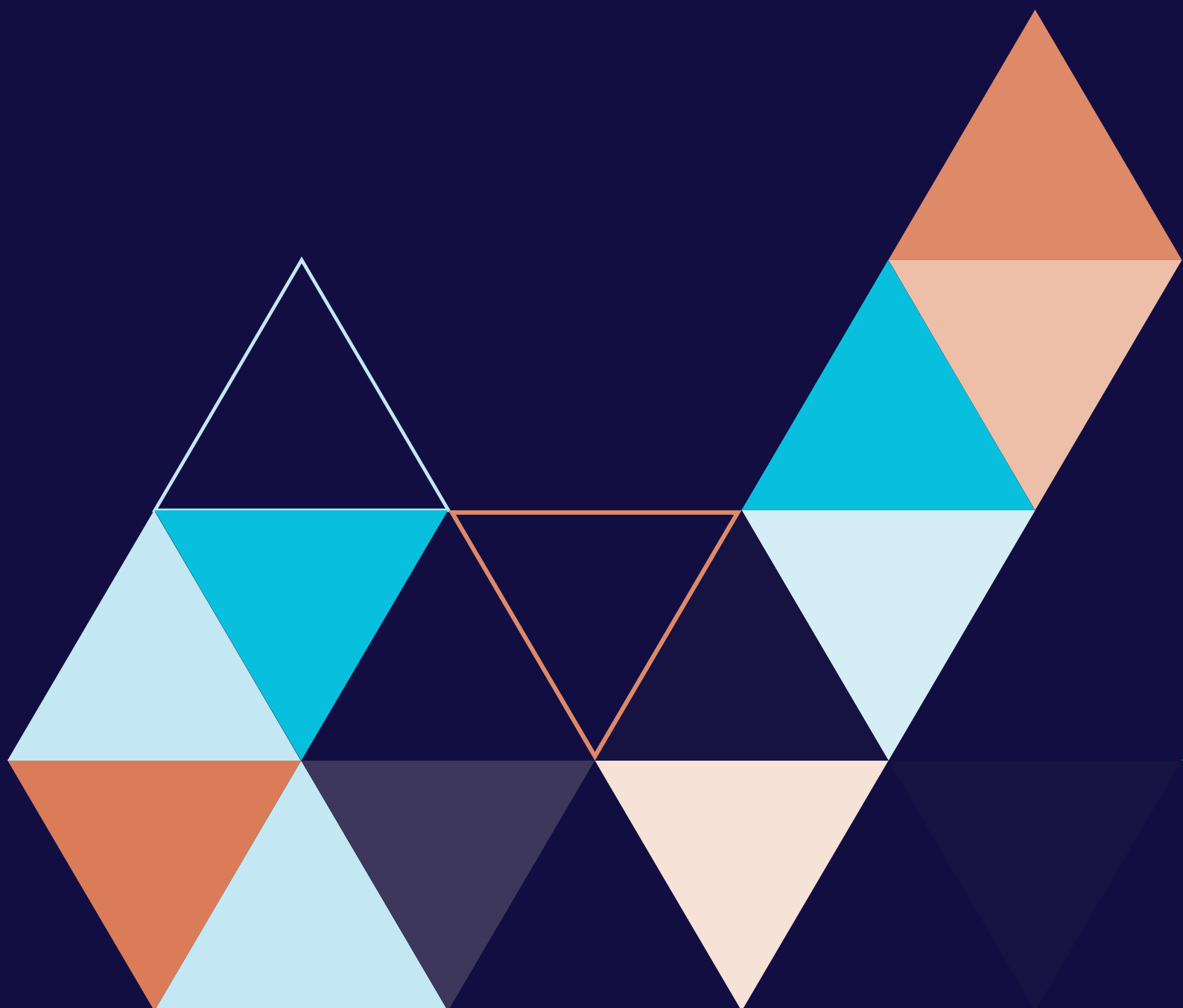
Figure 4. Russia sanctions compliance: Agency roles by sanction type



Agency acronyms	Agency names
CAA	Civil Aviation Authority
Crown Law	Crown Law Office
Customs	New Zealand Customs Service
INZ	Immigration New Zealand
IRD	Inland Revenue Department
ITOC	Integrated Targeting and Operations Centre

MFAT	Ministry of Foreign Affairs
MNZ	Maritime New Zealand
MPI	Ministry for Primary Industries
MoT	Ministry of Transport
NZDF	New Zealand Defence Force
NZ Police	New Zealand Police
NZTE	New Zealand Trade & Enterprise
OIO	Overseas Investment Office









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