

**SUBMISSIONS TO THE PARLIAMENTARY JOINT COMMITTEE ON INTELLIGENCE
AND SECURITY**

FOR

**REVIEW OF THE LISTING OF THE ISLAMIC REVOLUTIONARY GUARD CORPS
(IRGC)**

AS A STATE SPONSOR OF TERRORISM UNDER THE CRIMINAL CODE

By

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Purpose of submission

- 1 This submission addresses whether the Islamic Revolutionary Guard Corps (**IRGC**) continues to satisfy the statutory criteria for designation as a *state sponsor of terrorism* under the *Criminal Code Act 1995 (Criminal Code)*.
- 2 For the reasons set out below, there are continuing and strengthened reasonable grounds for maintaining the IRGC's designation, particularly having regard to:
 - ☐ the IRGC's transnational ideological operations;
 - ☐ its reliance on proxies and indirect actors;
 - ☐ its advocacy and incitement activities abroad; and
 - ☐ the demonstrated security risks to Australia.

Statutory Framework

- 3 Under s 110.3(3) of the *Criminal Code*, before specifying an entity as a state sponsor of terrorism, the AFP Minister must be satisfied on reasonable grounds that:
 - (a) the entity is a foreign state entity; and
 - (b) the entity or a member of the entity has directly or indirectly:
 - engaged in, prepared, planned, assisted in, or fostered the doing of a terrorist act targeted at Australia; or
 - advocated the doing of such an act.
- 4 "Advocated" is defined broadly (s 110.3(2)) and includes counselling, promoting, encouraging, urging, instructing, or praising terrorist acts where there is a substantial risk such conduct could lead a person to engage in a terrorist act.

The IRGC as a foreign state entity and ideological terror apparatus

- 5 The IRGC is a foreign state entity, embedded within Iran's constitutional and military structure, operating parallel to conventional armed forces.
- 6 It is not a traditional military organisation. It functions as an ideological enforcement and export mechanism, using violence, intimidation, proxies, and psychological operations to preserve the Islamic Republic and project influence abroad.

Terrorist conduct and escalation since 28 December 2025

- 7 Since 28 December 2025, the IRGC has escalated its domestic terror methods, including:
 - ☐ mass killings of civilians;
 - ☐ extrajudicial executions;

- ☐ enforced disappearances;
- ☐ collective punishment of cities; and
- ☐ a nationwide communications blackout designed to conceal evidence.

8 Credible reporting places the civilian death toll in the tens of thousands, with estimates of approximately 43,000. While precise figures remain contested due to the blackout, the method, scale, and intent of the violence demonstrate terrorism as a method of governance.

9 Of particular relevance is the IRGC's mobilisation of foreign militia forces, including Iraqi Shi'a militias, to suppress Iranian civilians. This reflects a transnational terror model that is readily transferable beyond Iran's borders.

International ideology, proxies, and global terrorism

10 The IRGC operates a global network of aligned militant groups, providing funding, training, weapons, and strategic direction.

11 This network has been linked internationally to attacks on civilians, dissidents, journalists, and Jewish communities. The IRGC's reliance on proxies is not incidental — it is central to its operating doctrine and enables plausible deniability.

Advocacy, incitement, and mobilisation abroad

12 In the months preceding the December 2025 escalation, and continuing thereafter, senior Iranian leadership, Khamenei, publicly directed messaging at Western audiences, including university students, praising and encouraging protest movements aligned with the regime's ideological objectives.

13 These communications framed such movements as part of a broader "resistance" struggle and were designed to mobilise, radicalise, and legitimise confrontation in foreign states.

14 For the purposes of s 110.3(2), such conduct constitutes advocacy under the *Criminal Code* where it directly or indirectly promotes or praises acts that carry a substantial risk of leading to terrorist violence.

Australian context and "targeted at Australia"

15 Australia is plainly within the class of Western democratic states to whom this ideological messaging is directed.

16 In August 2025, the Prime Minister confirmed that ASIO possessed credible intelligence linking the Iranian regime, through proxy actors, to antisemitic attacks in Melbourne and Sydney. The IRGC was assessed to have used a complex web of proxies to foster and assist those acts.

- 17 The deliberate targeting of Jewish institutions and community spaces constitutes conduct intended to intimidate a civilian population, satisfying the definition of a terrorist act and meeting the “targeted at Australia” requirement, even where conducted indirectly.

Foreseeable risk and the Bondi Beach attack (14 December 2025)

- 18 While this submission does not assert direct attribution for the Bondi Beach attack of 14 December 2025, that event illustrates the foreseeable consequences of sustained ideological incitement in a Western democratic context.
- 19 The *Criminal Code* does not require proof that advocacy directly caused a specific act. It is sufficient that praise, encouragement, or mobilisation occurs in circumstances where there is a substantial risk of leading persons to engage in terrorist violence.
- 20 The Bondi Beach attack demonstrates that such risks are not hypothetical. They materialise in real harm to Australian civilians, reinforcing the need for robust preventative measures under Part 5.3A.

Appropriateness of continued listing

- 21 Under s 110.5, the question is whether it is “not appropriate” for the IRGC to continue to be specified. Given:
- ☐ the IRGC’s transnational terror model;
 - ☐ its use of proxies;
 - ☐ its advocacy and ideological mobilisation abroad; and
 - ☐ demonstrated security risks within Australia,
- it would be inappropriate to remove or dilute the IRGC’s designation.

Conclusion

- 22 The Islamic Revolutionary Guard Corps is a state entity that engages in, fosters, and advocates terrorism, both domestically and internationally.
- 23 There remain compelling and strengthened reasonable grounds to maintain its listing as a state sponsor of terrorism under s 110.3 of the *Criminal Code*.
- 24 The Committee should recommend that the IRGC’s designation be maintained without qualification, in order to protect Australian communities and uphold the integrity of Australia’s counter-terrorism framework.