



**Address: 1200 Bay St, unit 1201  
Toronto, Canada M5R2A5  
Phone – Fax : 1 (888) 908 7317  
E: info@humanrightsintl.com**

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Secretariat of the Committee  
Parliamentary Joint Committee on Intelligence and Security  
PO Box 6021  
Parliament House  
Canberra ACT 2600  
Phone: +61 2 6277 2360

### **Submission of the International Center for Human Rights in Iran – Canada (ICHR)**

### **Review of the Listing of the Islamic Revolutionary Guard Corps (IRGC) as a State Sponsor of Terrorism under the Criminal Code**

#### **Position**

The International Center for Human Rights (ICHR) strongly supports the continued listing of the IRGC as a state sponsor of terrorism under Division 110 of the *Criminal Code*. The IRGC continues to meet the statutory threshold and remains an active, transnational actor engaged in terrorism, repression, and intimidation beyond Iran's borders.

At the same time, ICHR urges the Committee to recommend targeted implementation safeguards, particularly in relation to individuals compelled into IRGC-controlled service through Iran's system of mandatory conscription, subject to full security and criminal screening.

The IRGC is a foreign state entity embedded within Iran's governing structure and has directly and indirectly engaged in terrorist activity. There is no evidence of renunciation of violence, dismantling of proxy networks, or institutional reform that would justify reconsideration of the listing. On the contrary, the available evidence demonstrates an ongoing and persistent risk.

#### **Terrorism as Governance and Foreign Policy**

ICHR documentation confirms that the IRGC uses terrorism systematically as a method of governance. Domestically, it plays a central role in lethal repression, including arbitrary detention, torture, enforced disappearances, and the violent suppression of dissent.

Internationally, the IRGC exports this model by supporting repressive regimes and armed proxies. Its decisive role in sustaining the Syrian government under Bashar al-Assad during mass civilian killings illustrates that terrorism is deliberately employed as an instrument of foreign policy rather than confined to internal security matters.

#### **Transnational Terrorism and Operations Abroad**



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The IRGC has a well-documented history of conducting or directing terrorist operations on foreign soil. These include assassination plots, attempted mass-casualty attacks, and proxy operations across multiple continents.

Publicly documented cases include the attempted assassination of the Saudi Ambassador in Washington, D.C.; the thwarted 2018 bomb plot targeting an Iranian opposition gathering near Paris involving an Iranian diplomat later convicted in Belgium; and the 1994 AMIA Jewish community centre bombing in Argentina, which Argentine judicial findings have attributed to Iranian state direction through an IRGC-backed proxy.

These cases demonstrate that the IRGC is not merely a regional military force but a transnational terrorist actor with a sustained record of external operations.

### **Targeting of Dissidents and Journalists**

Beyond large-scale attacks, the IRGC engages in systematic transnational repression, targeting Iranian activists and journalists living in democratic states. Publicly documented cases include plots, threats, and intimidation against journalists associated with Radio Free Europe and Iran International.

This pattern demonstrates that the IRGC treats foreign sovereign territory as an operational theatre for intimidation and attempted elimination of civilians engaged in lawful journalism and political expression.

### **Conscription and the Need for Targeted Safeguards**

Individuals forced to serve as conscripts within IRGC-controlled units generally lack ideological affiliation, command authority, or voluntary participation and often perform non-operational roles. While ICHR strongly supports the IRGC listing, it urges the Committee to recommend that conscripts not be automatically captured by the designation.

ICHR supports a security-screened exemption framework, under which former conscripts with no meaningful or voluntary involvement in IRGC activities may travel and reunite with family members, subject to rigorous security, intelligence, and criminal background checks. This approach preserves national security while preventing unjust family separation and humanitarian harm.

### **Recommendations**

ICHR respectfully recommends that the Committee:

1. Affirm the continued listing of the IRGC as a state sponsor of terrorism;
2. Recognise the IRGC as a transnational terrorist actor engaged in repression and violence beyond Iran's borders; and
3. Recommend explicit guidance distinguishing coerced conscripts from IRGC commanders and voluntary members, with any exemptions subject to full security screening.



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## Conclusion

The IRGC remains a central instrument of state terror and transnational violence. Maintaining the listing is essential. Implementing it with precision, by targeting perpetrators while protecting coerced individuals, will strengthen both the effectiveness and legitimacy of Australia's counter-terrorism framework.

Sincerely,

Daryanaz ShirinKam

Director,

The International Center for Human Rights in Iran – Canada (ICHRI)

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