



Australian Iranian Community Alliance Inc.
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Incorporation Number: A45215

Submission to the Parliamentary Joint Committee on Intelligence and Security

Review of the Criminal Code Amendment (State Sponsors of Terrorism) Bill 2025

Submitted by: Australian Iranian Community Alliance (AICA)

Date: 24 October 2025

1. About the Australian Iranian Community Alliance (AICA)

The **Australian Iranian Community Alliance (AICA)** is a non-profit, non-partisan organisation representing **24 Iranian community organisations and groups across Australia**. AICA advocates for democracy, human rights, and the social and cultural advancement of the Iranian-Australian community, while promoting harmony and integration within Australia's multicultural society.

AICA operates through partnerships with community organisations, cultural institutions, and government agencies, with a strong emphasis on civic participation, policy engagement, and community safety.

2. Purpose of this Submission

This submission is made in response to the **Review of the Criminal Code Amendment (State Sponsors of Terrorism) Bill 2025**.

AICA supports the Bill's objective of strengthening Australia's national security framework by establishing a mechanism to **designate foreign states that sponsor terrorism**, ensuring that Australian law can respond effectively to the actions of regimes that fund, direct, or enable terrorist activity.

If passed, the Bill will grant the Australian Government the power to **formally list and take action against groups and entities such as the Islamic Revolutionary Guard Corps (IRGC)**, provided the legislative criteria for designation are satisfied. This is an important and necessary capability for safeguarding Australia's sovereignty and security.

Our submission highlights:

- The Islamic Republic of Iran's extensive record of sponsoring and supporting terrorism through its military arm, the **IRGC**.



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- The IRGC's ongoing activities that pose risks to Australia's security and to Iranian-Australian citizens; and
- Practical recommendations to ensure that the Bill achieves meaningful, enforceable outcomes rather than symbolic effect.

3. Background and Context

The **Criminal Code Amendment (State Sponsors of Terrorism) Bill 2025** provides Parliament with the power to formally designate states that directly or indirectly support terrorism.

AICA strongly supports this initiative and submits that the **Islamic Republic of Iran** meets all reasonable criteria for designation under the proposed framework.

The regime's **Islamic Revolutionary Guard Corps (IRGC)** functions as both a military and ideological force, responsible for:

- Supporting and financing terrorist organisations, including Hezbollah and Hamas.
- Engaging in cyberattacks, kidnappings, and extraterritorial assassinations.
- Orchestrating transnational repression targeting Iranian dissidents abroad; and
- Conducting propaganda and disinformation campaigns within democratic nations, including Australia.

These actions demonstrate a **pattern of state-sponsored terrorism and interference** that undermines Australia's sovereignty, national security, and multicultural harmony.

4. Impacts on the Iranian-Australian Community

a. Intimidation and fear:

Iranian-Australians — especially women's rights activists, journalists, and human rights advocates — report threats, harassment, and intimidation linked to individuals sympathetic to the IRGC or Iranian state institutions.

b. Infiltration of cultural and religious networks:

Certain groups in Australia operate under the guise of cultural or religious engagement but serve as fronts for Iranian state narratives, promoting division and silencing pro-democracy voices.

c. Chilling effect on civic participation:

Ongoing intimidation discourages members of the Iranian-Australian community from participating in public life or engaging with government processes — a direct consequence of foreign state influence.



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d. National security implications:

The IRGC's operational reach, combined with its global support for terrorism, represents a tangible threat that underscores the necessity of robust legislation such as the **State Sponsors of Terrorism Bill**.

5. Recommendations

To ensure that the **Criminal Code Amendment (State Sponsors of Terrorism) Bill 2025** achieves its intended outcomes, AICA recommends the following:

1. Meaningful and Enforceable Action

Designation under the Bill must have tangible legal and financial consequences. The listing of a state sponsor of terrorism — such as the Islamic Republic of Iran — should automatically trigger sanctions, travel bans, and financial restrictions that limit its agents' capacity to operate within Australia.

2. Consistent Application of Existing Laws

Provisions of the *Criminal Code Act 1995* relating to terrorism, material support, and financing must be fully utilised to ensure enforcement is consistent and effective once a state is designated.

3. Swift and Coordinated Implementation

The Bill should include provisions for immediate commencement upon passage. Delays in implementation could enable ongoing activities by foreign state actors and diminish the Bill's deterrent effect.

4. Strengthened Border and Entry Controls

Individuals linked to the IRGC or other organs of state-sponsored terrorism should be barred from entering or residing in Australia. Enhanced intelligence sharing between ASIO, AFP, and immigration authorities will be essential for compliance.

5. Enhanced Monitoring of State Influence Networks

Ensure interagency cooperation to identify and dismantle influence networks associated with designated state sponsors. This includes IRGC-linked cultural and business fronts that operate under community or religious cover.

6. Community Protection and Support Mechanisms

Establish confidential reporting mechanisms for individuals facing intimidation linked to foreign state activity and provide funding to community organisations to deliver education and safety programs.

7. Diplomatic and Institutional Accountability

Mandate transparency for cultural, educational, or media entities with known or suspected links to designated states. Review diplomatic privileges and accreditation where credible evidence of intimidation or propaganda is identified.



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8. Representation and Consultation

Include Iranian-Australians and other diaspora communities in the ongoing review and monitoring of this legislation to ensure that implementation reflects both national security and human rights priorities.

6. Additional Measures for Effective Implementation

To enhance the practical operation of the **State Sponsors of Terrorism framework**, AICA recommends that the following complementary measures be adopted:

a. Visa Revocation and Immigration Safeguards

Cancel existing visas of individuals identified as members or key supporters of entities representing designated states. Strengthen immigration screening to prevent indirect pathways to residency or citizenship for such individuals.

b. Asset Freezing and Financial Restrictions

Require immediate freezing of assets, property, and accounts associated with state-linked entities or individuals operating in Australia. Financial institutions should be mandated to report suspected transactions under Australia's anti-money laundering and counterterrorism financing laws.

c. Interagency Coordination and International Cooperation

Promote real-time data sharing between security agencies, financial regulators, and allied nations to ensure the effective enforcement of designations and sanctions under the Bill.

d. Accountability for Enablers and Facilitators

Introduce secondary sanctions against individuals, companies, or intermediaries who knowingly provide material support, funding, or facilitation to designated state sponsors of terrorism or their affiliates.

e. Clear and Immediate Commencement Timelines

Ensure that all provisions of the Bill come into effect promptly upon passage to guarantee operational readiness and uphold Australia's deterrence posture.

7. Conclusion

The **Criminal Code Amendment (State Sponsors of Terrorism) Bill 2025** represents a critical advancement in Australia's national security legislation. If enacted, it will empower the Australian Government to **formally list and take action against groups such as the IRGC**, once the legislative requirements for designation are met.



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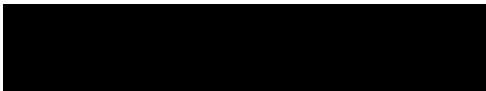
By ensuring strong enforcement, transparent implementation, and community protection measures, Parliament can send a clear message that **state-sponsored terrorism has no place in Australia's democratic society.**

The **Islamic Republic of Iran**, through the actions of the **IRGC**, exemplifies why such a framework is urgently needed. Adopting and fully enforcing this Bill will strengthen both **Australia's national security** and its **commitment to global human rights and justice.**

8. Contact Details

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AICA consents to the publication of this submission under its organisational name. Personal contact details are provided separately for administrative purposes only.