



23 October 2025

RESPONSE TO YOUR OFFICIAL INFORMATION ACT REQUEST

Thank you for your email of 7 October 2025, in which you requested, pursuant to the Official Information Act 1982 (the Act), the following information:

*Under the **Official Information Act 1982**, I request information concerning **Air New Zealand Gas Turbines (ANZGT)** and its overseas maintenance and service contracts during the period **1 January 2015 to 31 December 2019**, including work undertaken for the **Royal Saudi Navy**.*

Please provide:

1. **All records of communication, correspondence, or briefings** sent from the Air New Zealand Gas Turbines unit to the **Chief Executive, Executive Management Team, or Board of Directors**, relating to:
 - overseas clients with defence or military affiliations;
 - export permits, licensing, or MFAT notifications;
 - reputational or legal risk assessments; or
 - proposed or signed service contracts for LM2500 or LM5000 turbines.
2. **All replies or follow-up instructions** issued from the **Chief Executive's Office** to the Gas Turbines unit regarding such matters.
3. **Any correspondence between Air New Zealand and MFAT, Treasury, NZDF, or the Ministry of Defence** that references:
 - notification or discussion of overseas contracts for defence clients;
 - interpretation of export-control requirements; or
 - awareness or briefings to Ministers or Government officials about ANZGT work.
4. **Any internal summaries or board papers** prepared after such communications that note executive or board awareness of the Gas Turbines activities or contracts.
5. **A document register or correspondence log** listing all communications between the **Gas Turbines unit and the Chief Executive's Office** from 2015–2019 that include any of the following keywords:

“Saudi”, “LM2500”, “Gas Turbines”, “export permit”, “defence contract”, “MFAT”, “Treasury”, “notification”.

The Ministry of Defence (the Ministry) is a civilian agency that is responsible for the development of defence policy, international defence engagement and the delivery of major defence equipment.

We note that your OIA request was also addressed to Air New Zealand, the Ministry of Foreign Affairs and Trade (MFAT), and the New Zealand Defence Force (NZDF). Unfortunately, the contact details for those agencies were incorrect and, as such, we have forwarded your request onto MFAT and the NZDF for response. MFAT is responsible for administering New Zealand’s export control regime and would be best placed to respond to these aspects of your request.

For your awareness, Air New Zealand is not subject to the Official Information Act (OIA) 1982 as it only applies to central government agencies, Crown entities, state-owned enterprises and other organisations and will not have received your request. If you would like to contact Air New Zealand directly they can be contacted on 0800 737 000 (within New Zealand) or +64 (0)9 357 3000 (overseas).

By way of scoping your request, we have interpreted your request as outlined in your letter to capture information that specifically relates to the ‘*Chief Executive*’, ‘*Executive Management Team*’, ‘*Board of Directors*’, or ‘*Chief Executive’s Office*’ of Air New Zealand not that of the Ministry’s leadership. Therefore, questions one, two, four, and five are declined pursuant to section 18(e), as the documents alleged to contain the information requested do not exist or, despite reasonable efforts to locate them, cannot be found.

We have undertaken a search of correspondence between Air New Zealand and the Ministry that references the matters you have outlined in question three. Nothing has been identified within scope of your request and, as such, this part of your OIA is declined pursuant to section 18(e), as the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

Under section 28(3) of the Act you have the right to request the Ombudsman to investigate and review this response.

Yours sincerely

Sarah Minson
Deputy Secretary, Capability Delivery

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**MANATŪ KAUPAPA
WAONGA**
NEW ZEALAND
MINISTRY OF DEFENCE

19 November 2025

RESPONSE TO YOUR OFFICIAL INFORMATION ACT REQUEST

Thank you for your email of 23 October 2025, regarding the Ministry's initial response to your request of 7 October that identified no Ministry information within scope of your request pertaining to the Air New Zealand Gas Turbines Unit (ANZGTU) overseas maintenance and service contracts.

You made a further request, pursuant to the Official Information Act 1982 (the Act), regarding the following:

*Those same MFAT briefings reference **ongoing discussions between agencies**—including the Ministry of Defence, NZDF, Treasury, and the Prime Minister's Office—about how to manage the issue publicly.*

Given that, I find it unlikely that the Ministry of Defence holds no records or correspondence whatsoever relating to:

- *the identification of the engines as military hardware by Customs;*
- *inter-agency briefings or awareness of the Saudi Royal Navy contract; or*
- *subsequent consideration of Air New Zealand's participation in overseas defence work.*

*To assist, I ask that the Ministry please **review its search parameters**, particularly for correspondence or meeting records from **2018–2021** that may include key words such as "Air New Zealand Gas Turbines," "Saudi," "LM2500," "MFAT," or "export controls."*

*If the Ministry maintains its position that no such information exists, I would appreciate a **detailed explanation** of how this determination was reached—including which databases, offices, and senior officials were consulted in the search process.*

To reiterate, the Ministry of Defence (the Ministry) is a civilian agency that is responsible for the development of defence policy, international defence engagements and the delivery of major capability projects. The Ministry of Foreign Affairs and Trade (MFAT) is responsible for administering New Zealand's export control regime and is best-placed to address questions regarding that. I understand the New Zealand Defence Force has received similar requests

from you relating to ANZGTU work with the Royal Saudi Navy. We refer to their response for information relating to that agency.

As outlined in my previous response, the Ministry had no role in relation to ANZGTU work with the Royal Saudi Navy. The Ministry undertook a search of correspondence from Air New Zealand to the Ministry on the matters you outlined and, identified no information in scope of your 7 October request.

You reference the Ministry being referred to in MFAT briefings relating to ANZGTU and their contract with the Royal Saudi Navy. I believe you may be referring to the following documents that are published on the MFAT website titled "OIA 30240 – Air NZ GE LM2500": <https://mfat.govt.nz/en/about-us/contact-us/official-information-act-responses>. Pages 66–68 of that material include correspondence between the Ministry and the Office of the then Minister of Defence. Given the media interest in the ANZGTU/Royal Saudi Navy matter, the Office had asked Defence to provide talking points about defence engagement with Saudi Arabia, which was provided and then subsequently forwarded to MFAT for their information.

Similarly, as part of briefing for the 2021/22 Estimates Review of Vote Defence and Vote Defence Force by Foreign Affairs, Defence and Trade Select Committee, the following background information was provided in relation to the Government Procurement Rules and due diligence requirements for major defence capability projects:

Would this prevent a situation similar to Air New Zealand's contract with the Saudi Navy?

- Possibly not. Knowing the make-up of the supply chain does not extend to having visibility of who a sub-contractor might also supply.

Do you have any suppliers who also supply the Saudi Navy and, if so, who are they?

- Very likely. Saudi Arabia is a significant market for suppliers of defence capabilities, particularly US companies. Some of these companies will have contracts with us for the delivery of equipment.

This material was not found to be in scope of your previous request.

The Ministry has undertaken a further search of our records, drawing on your provided search terms and in the time period of 2018-2021. The Ministry identified no records relevant to your request. You have suggested search terms that are elements of our normal business. We would not expect to identify any material as it does not relate to the functions and operations of the Ministry. Given this context, I continue to advise that no Ministry records have been identified that relate to your request for ANZGTU overseas service contacts. On this basis, this request is declined under section 18(e) of the Act that the information requested cannot be found.

Under section 28(3) of the Act you have the right to request the Ombudsman to investigate and review this response.

Yours sincerely

Sarah Minson
Deputy Secretary, Capability Delivery