

14 July 2025

195 Lambton Quay
Private Bag 18-901
Wellington 6160
New Zealand

Personal details removed for proactive release.

T +64 4 439 8000
F +64 4 472 9596

OIA 30191

Thank you for your email of 13 June 2025 in which you request the following under the Official Information Act 1982 (OIA):

"Under the Official Information Act, I would like to request copies of any advice, briefings, memos, assessments, or correspondence produced since 22 February 2022 about:

- 1. The importation of oil products refined from Russian crude in third countries, and the implications of such imports for New Zealand's Russia sanctions regime.*
- 2. The Jamnagar Refinery in India or other refineries known to process Russian crude and export refined products.*
- 3. **Potential or confirmed breaches of the Russia Sanctions Act 2022.**"*

On 2 July 2025, part three of your request (bolded above) was transferred, under section 14(b) of the OIA, to New Zealand Police for response.

Response to your request

The following three documents contain information that is in scope of part one of your request:

1. Russia Sanctions – Further Trade Measures , dated 22 September 2022
2. Russia Sanctions – Further Trade Measures, dated 5 October 2022
3. Oil Matters NZ Response to protect the oil price cap options paper

In accordance with section 16(1)(e) of the OIA, excerpts from the relevant sections of these documents are provided below. Some information is withheld under the following sections of the OIA:

- 6(a): to avoid prejudicing the security or defence of New Zealand or the international relations of the New Zealand Government;
- 6(b)(i): to protect the passing of information from another government on a confidential basis;
- 9(2)(b)(ii): to avoid prejudice to the commercial position of another party; and
- 9(2)(g)(i): to protect the free and frank expression of opinions by departments.

Where the information has been withheld under section 9 of the OIA, no public interest in releasing the information has been identified that would override the reasons for withholding it.

Excerpt from Russia Sanctions – Further Trade Measures dated 22 September 2022

12. Aotearoa New Zealand's exposure to Russian energy products is limited. We do not import oil, gas or coal directly from Russia. However, all major oil refining countries import at least some Russian product. Aotearoa New Zealand's top five refined oil supplying countries are Singapore, South Korea, Malaysia, Japan and India. For all except Singapore, Russian oil has been one of their top ten sources of fuels. s9(2)(g)(i)

Excerpt from Russia Sanctions – Further Trade Measures dated 5 October 2022

9. In relation to oil specifically, it is likely that Russian fuel is indirectly entering Aotearoa New Zealand, blended with oil from other source countries. While we only import refined oil, and none directly from Russia, all of our top five refined oil supplying countries (Singapore, South Korea, Malaysia, Japan and India) import Russian oil to various degrees. s6(a)

10. s9(2)(g)(i)

s9(2)(b)(ii)

i. s6(b)
(i)

Excerpt from Oil Matters NZ Response to protect the oil price cap options paper

Why Oil Matters

1. Oil and natural gas companies are a crucial part of Russia's economy. As of April 2022, Russia was the world's third largest oil producing country, the world's largest exporter of oil products and the second largest producer of crude oil.¹
2. The sale of crude oil and refined oil products is the Russian government's greatest revenue stream. Before the 2022 war, it earned a third of the total Russian budget.² Reducing Russia's oil revenues is a powerful strategy to deny the Kremlin funds for its illegal war in Ukraine.

Part two of your request is refused under section 18(e) of the OIA, as the information requested does not exist.

Please note that it is our policy to proactively release our responses to official information requests where possible. Therefore, our response to your request (with your personal information removed) may be published on the Ministry website:

www.mfat.govt.nz/en/about-us/contact-us/official-information-act-responses/

If you have any questions about this decision, you can contact us by email at:

DM-ESD@mfat.govt.nz. You have the right to seek an investigation and review by the Ombudsman of this decision by contacting www.ombudsman.parliament.nz or freephone 0800 802 602.

Nāku noa, nā



Sarah Corbett
for Secretary of Foreign Affairs and Trade

Released under the Official Information Act