



NEW ZEALAND
FOREIGN AFFAIRS & TRADE
Manatū Aorere



New Zealand Ministry of
Foreign Affairs and Trade
Manatū Aorere

5 February 2026

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Personal details removed for proactive release

OIA 30611

Tēnā koe Personal details removed for proactive release

Thank you for your email of 17 December 2025, in which you request the following under the Official Information Act 1982 (OIA):

*"Under the Official Information Act 1982, I request information relating to the **basis for the decision to reclassify the GE LM2500 gas turbine from a "controlled" to a "not controlled" item under the Strategic Goods framework in or around March 2021.***

*This request is **not** for the content of legal advice and is intended to avoid material subject to legal professional privilege.*

Specifically, I request:

1. **All non-legal factual, technical, policy, or risk considerations** relied upon by MFAT in reaching the March 2021 decision to reclassify the LM2500 as "not controlled".
2. **Records identifying which agencies or external parties provided input** into the reclassification decision, including (but not limited to):
 - New Zealand Customs Service
 - New Zealand Defence Force
 - Ministry of Defence
 - Overseas authorities or regulators
 - Manufacturers or commercial entities
3. **Any summaries, briefing notes, decision records, or internal communications** that:
 - explain the rationale for changing the earlier classification, or
 - compare the prior classification position with the revised position.
4. **Any documentation recording the decision-making process**, including:
 - who made the final decision,
 - when it was made, and
 - what factors were determinative in reaching that decision.

Exclusions and clarifications

- I am **not requesting the substance of legal advice** provided by Crown Law or others.
- If legal advice informed the decision, I request **only**:
 - confirmation that legal advice was sought,
 - the general subject matter of the advice, and

- *how the advice was operationalised into a decision (without disclosing privileged content).*

If information is withheld

If any information is withheld under the Act, please provide for each withheld item:

- *the document title and date,*
- *the agency or unit responsible, and*
- *the specific withholding ground relied upon.*

*This request relates to the same subject matter as Customs OIA references **25-462** and **25-642**, and Crown Law OIA **OIA-2526076**, but is **narrowly focused on the factual and policy basis for the reclassification decision itself.***

Prior to the Ministry of Foreign Affairs and Trade's (the Ministry) determination of 16 March 2021 that GE LE2500 gas turbines are not a controlled item, the Ministry sought information from a range of parties, including Air New Zealand and our international partners. The determination was made by the Ministry on the basis that the engines are not a component specially designed for military use, and they do not possess any unique military capabilities or any inherent military technologies.

Most of the information you requested is publicly available in response to a previous OIA request (reference: 30240), which can be accessed on the Ministry's website at:

<https://www.mfat.govt.nz/assets/OIA/OIA-2025/OIA-30240-GE-LM2500.pdf>

For part one of your request, the following documents are in scope and are attached:

- United States Commodity Jurisdiction Determination for GEAE LM2500 and LM2500+ modules (July 2005), Attachment A and US Correspondence

Parts two, three and four of your request are refused under section 18(d) of the OIA as the information is publicly available on the Ministry's website at the link below.

Specifically:

- Part two: pages 80–86, 95–108 and 115–118
- Part three: pages 80–86 and 115–118
- Part four: pages 111–118

<https://www.mfat.govt.nz/assets/OIA/OIA-2025/OIA-30240-GE-LM2500.pdf>

Further context is provided in Appendix One. The email dated 22 February 2021 refers to three attachments, which are released as part of this OIA response.

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
Appendix One -

Glossary of Terms

Acronym	Entity
MFAT	The Ministry of Foreign Affairs and Trade
MOD	The Ministry of Defence
NZDF	New Zealand Defence Force
OMFA	Office of the Minister of Foreign Affairs

OIA 30240 – previously released information available	
https://www.mfat.govt.nz/assets/OIA/OIA-2025/OIA-30240-GE-LM2500.pdf	
Pages	Content
3 - 25	Communications with Air New Zealand (some redactions)
25 - 29	Official correspondence from Air New Zealand regarding the control status of the GE LM2500 Engine (some redactions)
30 - 33	Communication internal at MFAT and with Air New Zealand (some redactions)
34 - 37	Official correspondence from MFAT to Air New Zealand regarding the control status of the GE LM2500 Engine (some redactions), including the New Zealand Gazette Export Controls
38 - 43	Correspondence between MFAT and Air New Zealand
44	Legally privileged internal and external MFAT correspondence (redacted 14 pages)
45 - 46	Air New Zealand media release
47	Legally privileged internal and external MFAT correspondence (MFAT) (redacted 8 pages)
48 - 57	MFAT, OMFA, and Air New Zealand correspondence re media request
58 - 64	MFAT, OMFA office, correspondence, including initial update from Air New Zealand
65 - 68	MFAT, NZDF, MOD, OMFA, Office of Minister of Defence correspondence
69 - 70	Correspondence from foreign government (redacted) File note summarising meeting with foreign government (redacted)
71 - 72	MFAT, OMFA correspondence regarding submission on the export of turbines (minor redactions)
73 - 74	MFAT, OMFA, Air New Zealand legally privileged correspondence regarding the process ahead
75 - 78	Air New Zealand media release (attachment), OMFA, MFAT, Air New Zealand correspondence
79	Legally privileged MFAT correspondence (some redactions). Reference to US export controls.
80 - 86	MFAT, OMFA correspondence and submission on an Air New Zealand general consent permit. Submission references the US State Department determination dated 01 June 2005 stating that LM2500 engines do not have any unique military capabilities or any inherently military technologies.
87 - 89	MFAT, OMFA correspondence (including some legally privileged) regarding queries from New Zealand companies
90 - 94	Correspondence between MFAT (including media), OMFA, regarding talking points
95 - 108	Correspondence between MFAT (including media), OMFA regarding the export controls determination, informing Air New Zealand and subsequent media release from MFAT (available online)

	https://www.mfat.govt.nz/en/media-and-resources/export-controls-decision)
109 - 110	MFAT background note on Air New Zealand Gas Turbine Servicing for the Royal Saudi Navy (some redactions)
111 - 114	MFAT Submission regarding the determination regarding the control and export status of marine gas turbines (minor redactions)
115 - 118	MFAT Commodity determination for GE LM2500 Marine Gas Turbine Engines (including reference to supporting information DDTC Case CJ 029-05) (minor redactions)
Additional information released previously but not available online	
	United States Commodity Jurisdiction Determination for GEAE LM2500 and LM2500+ modules (July 2005), Attachment A and US Correspondence



United States Department of State

*Bureau of Political-Military Affairs
Directorate of Defense Trade Controls*

Washington, D.C. 20520-0112

In Reply Refer to
DDTC Case CJ 029-05

JUN 1 2005

YOUR LETTER DATED: February 1, 2005

**COMMODITY JURISDICTION DETERMINATION FOR:
GEAE LM2500 and LM2500+ Modules**

Your commodity jurisdiction (CJ) request was referred to the Departments of Defense and Commerce for review and recommendations. These products are marine and industrial gas turbines used in a wide variety of commercial and military applications. They are used in a number of mechanical drive propulsion system architectures. These modules do not have any unique military capabilities or any inherently military technologies.

The Department of State has determined that the **GEAE LM2500 and LM2500+ Modules are not subject to the licensing jurisdiction of the Department of State.** However, export may require authorization from the Department of Commerce (DOC). Please consult the DOC Export Counseling Division at (202) 482-4811 to determine requirements prior to export.

Should you require further assistance on this matter, please contact Denzil Tice at ticedr@state.gov or (202) 663-2734.

Sincerely,

Michael T. Dixon
Acting Managing Director

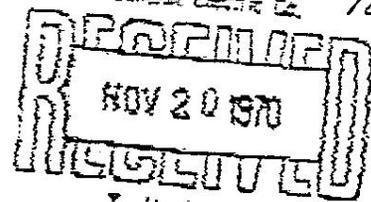
Kevin G. Matthews
GE Transportation
One Neumann Way, MD A200
Cincinnati, OH 45215



DEPARTMENT OF STATE

WASHINGTON, D.C. 20520

In reply refer to
MC Case CI-33



T. H. LABASH

NOV 19 1970

Mr. T. N. Labash
General Electric Company
777 - 14th Street, Northwest
Washington, D. C. 20005

Dear Mr. Labash:

Reference is made to your letter of October 21, 1970, regarding the transfer of export control authority, to the Department of Commerce, for the LM 2500 Gas Turbine.

This letter will serve as confirmation that, effective December 17, 1970, export control authority will transfer to the Department of Commerce and the LM 2500 will no longer be subject to the Department of State's licensing requirements.

Sincerely yours,

John W. Sipes
Director
Office of Munitions Control

October 13, 1970

Dear Mr. Siposs:

The General Electric Company has developed a LM2500 gas turbine for marine and industrial applications. This gas turbine was derived from the CF6-6/TF39 aircraft engine. The CF6-6 engine was granted a type certificate by the FAA on 16 September 1970 and export control authority for this engine was transferred to the Department of Commerce on this same date.

The Department of State has authorized export of technical data relating to the LM2500 to potential foreign marine and industrial customers under Export Licenses 80712X, 66302X, 15583X, 11343X, and 13044X.

The first LM2500 gas turbine engine was installed on 18 December 1969 aboard the USNS Sgt. W. M. Callaghan, a roll-on/roll-off cargo ship built by San Shipbuilding and Dry Dock Co. and operated under charter to the Navy's Military Sea Transport Service by American Export International Lines, Inc.

It is requested that export control authority for the LM2500 gas turbine engine be transferred from the Department of State to the Department of Commerce on 17 December 1970 when this engine will have been in commercial service for one year.

Yours sincerely,

T. H. Labash

October 21, 1970

Mr. J. W. Sipes, Director
Office of Munitions Control
Department of State
Washington, D.C. 20520

Dear Mr. Sipes:

The General Electric Company has developed an LM2500 gas turbine for marine and industrial applications. This gas turbine was derived from the CF6-6/TF39 aircraft engines. The CF6-6 engine was granted a type certificate by the FAA on 16 September 1970 and export control authority for this engine was transferred to the Department of Commerce on the same date.

The Department of State has authorized export of technical data relating to the LM2500 to potential foreign marine and industrial customers under export licenses 10718, 8636, 16583, 11343 and 11244.

The first LM2500 gas turbine engine was installed on 18 December 1969 aboard the GTS Wm. M. Callaghan, a roll-on/roll-off cargo ship built by Sun Shipbuilding and Dry Dock Co. and operated under charter to the Navy's Military Sea Transport Service by American Export Isbrandtsen Lines, Inc.

It is requested that export control authority for the LM2500 gas turbine engine be transferred from the Department of State to the Department of Commerce on 17 December 1970, when this engine will have been in commercial service for one year.

Very truly yours,

T. N. Leback

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TECHNICAL ASSESSMENT

Sub-assemblies and components for gas turbine propulsion system, specially designed for military use.

REFERENCES USED IN ASSESSMENT

Nil.