

13 March 2026

Personal Details removed for Proactive
Release

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

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

OIA 30730

Personal Details removed for
Tēnā koe Proactive Release

Thank you for your email of 13 February 2026 in which you request the following under the Official Information Act 1982 (OIA):

- 1. "To what extent do MFAT's proposed deemed export controls specifically target intangible technology transfers (ITT) for AUKUS Pillar II-relevant categories like quantum sensors and maritime surveillance software, and how might exemptions for fundamental research be calibrated to facilitate trusted R&D collaborations without compromising Wassenaar compliance?"*
- 2. Having found alignments between the NZ Strategic Goods List (NZSGL) with AUKUS partners' regimes, which precise performance thresholds or technical parameters in Category 3 (Electronics) and Category 6 (Sensors) has MFAT proposed revising to cover undersea surveillance systems, and what inter-agency consultation processes would ensure these enable seamless NZDF procurement interoperability?"*
- 3. How do MFAT's planned enhancements to end-user certificates (EUCs) and mandatory security agency vetting address verification gaps for high-risk dual-use exports like advanced semiconductors and cryogenic quantum systems, and what reciprocal licensing waivers could this unlock for NZ exporters engaging in future potential Pillar II supply chains?"*
- 4. What mechanisms is MFAT considering in order to expand enforcement capacity across Customs, NZSIS, and GCSB for monitoring domestic disclosures of "Very Sensitive" NZSGL items under AUKUS tech categories such as AI-driven autonomy and hypersonics, and how would these mitigate capacity strains identified in the previous 2021 independent review?"*
- 5. Beyond list harmonisation, which novel control processes (e.g., provisional permit decisions or catch-all clauses) does MFAT intend to revise that would align more closely with emerging Pillar II technologies like quantum-resistant cryptography and space-based propulsion, and how might these position MBIE-supported innovation hubs for deeper integration into AUKUS project roadmaps?"*

Response to your request

Question one: Intangible technology transfers and exemptions for fundamental research

Regarding part one of your request, we have consulted on proposals for strengthening New Zealand's export controls regime to address changing proliferation challenges relating to strategic goods and technology.

While the proposals in the consultation document to regulate intangible technology transfers (ITT) and domestic transfers of controlled technology (including ITT), are broadly intended to position New Zealand to benefit from potential reciprocal licensing exemptions and streamlined compliance processes in future, these proposals have not been designed to target specific technology for specific arrangements.

For the proposed (preferred option) deemed export/domestic controls, a permit would be required to supply New Zealand Strategic Goods List (NZSGL) Part one and Part two Sensitive and Very Sensitive technology to a non-exempt foreign person within New Zealand. Public feedback on this and other proposals in the consultation document are currently being analysed and will inform further policy development and decisions by Cabinet. The definition of fundamental research (and associated exemptions) are set out in the New Zealand Strategic Goods List (NZSGL): www.mfat.govt.nz/assets/Trade-General/Export-controls/New-Zealand-Strategic-Goods-List-October-2025.pdf. The consultation document proposed retain this definition, which will facilitate open research.

Question two: Undersea surveillance systems and NZDF procurement interoperability

Regarding part two of your request, New Zealand, like the countries in AUKUS and many others, belongs to four multilateral export control regimes (the Australia Group, Missile Technology Control Regime, Nuclear Suppliers Group and Wassenaar Arrangement). Lists of items from these regimes collectively form the basis for most of the NZSGL, together with additional nationally controlled items. National control entries can be identified within the NZSGL by the use of a "9" as the third character in the control code, a convention used to distinguish national controls from those originating in multilateral regimes.

The Secretary of Foreign Affairs and Trade authorised the most recent update (<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.mfat.govt.nz%2Fassets%2FTrade-General%2FExport-controls%2FNew-Zealand-Explanatory-Statement-2025.pdf&data=05%7C02%7CMark.Walker%40mfat.govt.nz%7C2b45b960e7b64cec0b9708de7d53f455%7C1aaaec2a4cb748cca7da41e33f622781%7C0%7C0%7C639085996704425416%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMmIsIkFOIjoiTWVpbCIzIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdta=hexGGsmnLLWM1Ygn5VUTE5NUWjIr1bUE32QJzASeXI%2BA%3D&reserved=0>) to the NZSGL in October 2025. This update introduced new nationally controlled items in several areas, including Category three (Electronics), but did not introduce any new controls within Category six (Sensors and Lasers).

The update was undertaken alongside other like-minded countries to ensure that specific emerging technology is regulated in the same way as all other dual use items on the NZSGL (<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.mfat.govt.nz%2Fassets%2FTrade-General%2FExport-controls%2FNew-Zealand-Explanatory-Statement-2025.pdf&data=05%7C02%7CMark.Walker%40mfat.govt.nz%7C2b45b960e7b64cec0b9708de7d53f455%7C1aaaec2a4cb748cca7da41e33f622781%7C0%7C0%7C639085996704425416%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMmIsIkFOIjoiTWVpbCIzIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdta=hexGGsmnLLWM1Ygn5VUTE5NUWjIr1bUE32QJzASeXI%2BA%3D&reserved=0>).

information removed) may be published on the MFAT 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

A handwritten signature in black ink, appearing to be 'SC', written in a cursive style.

Sarah Corbett
for Secretary of Foreign Affairs and Trade