



Meat Industry Association of New Zealand (Incorporated)

Submission to:

The Ministry of Business, Innovation & Employment

on:

Draft Fuel Security Plan

25 August 2025

1. Introduction

- 1) The Meat Industry Association (MIA) is a voluntary, membership-based organisation representing processors, marketers, and exporters of New Zealand red meat, rendered products, and hides and skins. MIA represents 99 percent of domestic red meat production and exports.
- 2) New Zealand's red meat sector is the country's second largest goods exporter, earning \$10.8 billion in export revenue in 2024/25. While volume was down, strong demand drove increased value leading to the increase in revenue.
- 3) The meat processing sector is New Zealand's largest manufacturing sector that employs over 25,000 people in about 60 processing plants, located mainly in the regions. The sector is a significant employer in many of New Zealand's rural communities and contributes over \$4 billion in household income.
- 4) A list of members is appended (Appendix 1). Individual members may have also made their own submissions.

2. Overview

- 6) MIA welcomes the opportunity to comment on the Draft Fuel Security Plan (the 'Plan'). The consultation document is clear and straightforward.
- 7) The New Zealand meat processing industry is highly reliant on liquid fuels, particularly diesel, to maintain its operations. While good progress has been made in reducing reliance on coal and other fossil fuels for on-site energy use, the industry's logistics continue to depend almost entirely on diesel-powered road haulage. This includes the transport of livestock to processing plants, the distribution of finished meat products to domestic and export markets, and the movement of waste and rendered by-products.
- 8) Unlike stationary energy, where substitution technologies are increasingly available, there are currently no viable large-scale alternatives to diesel for heavy road transport. This dependence represents a significant fuel security risk, as any sustained disruption to diesel supply would directly affect the ability of processors to move livestock, products, and by-products through the supply chain. Ensuring reliable and affordable access to liquid fuels is therefore critical to maintaining continuity of operations and safeguarding New Zealand's food production and export capacity.
- 9) MIA supports the intent of the Plan to enhance New Zealand's fuel security as an issue of national resilience and economic stability.
- 10) Any regulatory intervention in the fuel system or supply chain resilience must be mindful of impacts on industry costs and competitiveness.

3. Commentary on the Proposals

Draft Fuel Security Plan – Vision and Objectives

Our vision is to have a fuel system that is resilient to disruptions, so that people have access to fuel where and when they need it.

Our objective is to maintain fuel supply by:

- *improving energy independence*
- *reducing vulnerabilities in our fuel supply chains*
- *minimising the impact of fuel disruptions*

- 11) MIA is generally supportive of the vision and objectives of the Plan and recommends that the vision statement would benefit from inclusion of some reference to affordability of fuel and recognition that the fuel system is essential for economic prosperity.

Focus area 1: Resilience against global supply shocks

- 12) MIA supports the measures outlined to increase New Zealand's resilience to global supply challenges.

- 13) In implementing these measures, MBIE must seek to avoid imposing settings for Minimum Stockholding Obligations that create excessive compliance or cost burdens on industry participants that may be passed onto users. It is also important that any regulatory intervention does not unduly distort the competitiveness of fuel markets.

Focus area 2: Domestic resilience

- 14) MIA is supportive of the measures undertaken and planned.
- 15) MIA considers that any review of the Petroleum Demand Restraint Act 1981, or contingency planning for disruptions to the national fuel supply, should explicitly recognise livestock transport, meat processing, and product distribution as critical services. These activities are essential to maintaining national food security and export revenue and should therefore be assigned priority access to fuel reserves under any future prioritisation frameworks.

Focus area 3: Supporting domestic alternatives

- 16) The meat industry supports the long-term transition to lower-emissions fuels, including electrification, hydrogen, and biofuels.
- 17) MIA considers genuine transition to lower-emissions fuels far preferable to allowing the fossil fuel sector to rely on ETS-funded forestry offsets. Offsets can delay real emissions reductions and create perverse incentives, whereas direct investment in electrification, hydrogen, and biofuels drives measurable decarbonisation.
- 18) MIA welcomes the Government's decision to encourage change through incentives and investment, including special economic zones and other enabling regulatory measures. At the same time, policy must recognise that liquid fuels will remain critical for several decades, particularly for heavy freight and export logistics.

Focus area 4: Resilience in a transitioning market

- 19) MIA recognises that the transition of fuel supply and demand will present numerous challenges for industry. While New Zealand can contribute to, and learn from, the experiences of other countries, domestic industries require predictable and consistent policy settings to plan and operate effectively.
- 20) **MIA recommends that a nationally coordinated approach to energy security is essential for efficiency and avoiding unintended consequences.** For example, constraints in gas or electricity supply coinciding with fuel shortages could magnify disruption to processing and export operations. Connected and enduring policy provides the certainty necessary for investment, and adaptation, supporting both productivity and long-term fuel security.

MIA Contact

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Appendix 1

MIA members and affiliate members as at 17 February 2025

Members	
Advance Marketing Limited Exporter Membership	Waimarie Meats Partnership
AFFCO NZ Ltd - Membership Levy	Wallace Group LP
Alliance Group Limited	Wilbur Ellis NZ Ltd
Ample Group Limited	Wilmar Trading (Australia) Pty Ltd
ANZCO Foods Ltd	
Ashburton Meat Processors Limited	
Auckland Meat Processors	Affiliate Members
Bakels Edible Oils (NZ) Ltd	Abattoirs Association of NZ
Ballande NZ Ltd	AgResearch
Black Origin Meat Processors	Alfa Laval New Zealand Ltd
Blue Sky Meats (NZ) Limited	Americold NZ Ltd
Columbia Exports Ltd	Aon New Zealand Ltd
Crusader Meats	AsureQuality NZ Ltd
Davmet NZ Limited	AusPac Ingredients NZ Ltd
Fern Ridge Ltd	Beca Ltd
Firstlight Foods Limited	Centreport Wellington
Garra International Limited	CMA CGM Group Agencies (NZ) Ltd
GrainCorp Commodity Management	CoolTranz 2014 Ltd
Greenlea Premier Meats	G-Tech Separation - Bellmor Engineering
Harrier Exports Ltd	Global Life Sciences Solutions New Zealand
Intergrated Foods Consortium	Haarslev Industries New Zealand
Kintyre Meats Ltd	Hapag-Lloyd (New Zealand) Ltd
Lean Meats Oamaru	IBEX Industries Limited
Lowe Corporation Ltd	Intralox LLC
Mathias NZ Limited	Kemin Industries Ltd
Ovation NZ Ltd	Liquistore
Peak Commodities Limited	Maersk A/S
Prime Range Meats	MJI Universal Pte Ltd
Progressive Meats Limited	Oceanic Navigation Ltd
PVL Proteins Ltd	Port of Napier
SBT Marketing (2009) Ltd	Port of Otago Ltd
Silver Fern Farms Ltd	Pyramid Trucking Ltd
Standard Commodities NZ Limited	Rendertech
Taylor Preston Limited	SCL Products Limited
Te Kuiti Meat Processors Limited	Scott Technology Ltd
UBP Limited	Sealed Air - Cryovac
Value Proteins Ltd	Suncorp New Zealand Services Limited