

Ballance Agri-Nutrients

Att: Mr. Kelvin Wickham, Chief Executive Officer

161 Hewletts Road, Mount Maunganui

Private Bag 12-503, Tauranga

New Zealand

Brussels, 09.04.2026

RE. BALLANCE AGRI-NUTRIENTS' 2025 PHOSPHATE IMPORTS FROM OCCUPIED WESTERN SAHARA

Dear Mr Wickham,

We are writing further to our letter of 5 February 2025 concerning Ballance Agri-Nutrients' imports of phosphate rock from occupied Western Sahara, and in the context of our preparation of the upcoming annual overview of Morocco's phosphate exports from the territory.

Our monitoring indicates that, during 2025, Ballance Agri-Nutrients received three shipments of phosphate rock from the Boucraa mine in Western Sahara, with a combined estimated volume of approximately 171,000 tonnes. The shipments are recorded as follows:

- *Anarita* (IMO 9636008), departing El Aaiún on 16 April 2025, arriving Tauranga on 21 May 2025;
- *Cl Lindy* (IMO 9720988), departing El Aaiún on 10 July 2025, arriving Bluff on 18 August 2025;
- *Oceanmaster* (IMO 9641340), departing El Aaiún on 23 October 2025, arriving Bluff on 3 December 2025.

This represents a significant increase compared to 2024, when our research indicated that Ballance Agri-Nutrients imported two shipments from the territory. This suggests an intensified reliance on phosphate sourced from an occupied, non-self-governing territory.

As in previous correspondence, we do not propose to restate in detail the ethical, legal, and political concerns associated with such imports. These have been extensively addressed in our earlier letters. Many of the questions raised therein have, regrettably, remained unanswered and therefore continue to be pertinent.

In light of the above, we would appreciate clarification on the following points:

1. *Can Ballance Agri-Nutrients confirm the receipt of the three shipments listed above during 2025?*
2. *How does Ballance reconcile the scale of its 2025 imports with its public commitments to responsible sourcing and respect for human rights?*

We further note that Ballance continues to reference advice from Tūhana Business and Human Rights in support of its sourcing decisions on its website. While we recognise the role of external human rights consultants in corporate due diligence processes, we are concerned that the advice relied upon appears to treat the exploitation of natural resources in Western Sahara as a neutral supply-chain issue, rather than one fundamentally shaped by the unresolved denial of the Saharawi people's right to self-determination.

In particular, the framing adopted by Tūhana - as reflected in Ballance's public communications - downplays the centrality of the Saharawi people's right to self-determination, conflates a consultation exercise with consent, and treats resource extraction under occupation as a neutral commercial activity - positions that are difficult to reconcile with international law and authoritative human rights standards.

Against this background, we would welcome Ballance's response to the following questions:

3. *On what basis does Ballance consider the advice it has received to adequately address the right of the Saharawi people to self-determination and permanent sovereignty over natural resources?*
4. *Has Ballance sought or obtained the consent of the Saharawi people, through their UN-recognised representative, for the import of phosphate rock from Western Sahara?*
5. *Will Ballance make public the assessment carried out by Tūhana, including its terms of reference and methodology, to allow for independent scrutiny?*
6. *How does Ballance assess the reputational and legal risks associated with continued reliance on advice that does not engage substantively with the legal status of Western Sahara?*

New Zealand farmers have a strong interest in ensuring that their cooperative is not associated with the exploitation of natural resources from an occupied territory where the people have never been allowed to exercise their right to self-determination. Many companies globally have demonstrated that it is possible, through technical adaptation and genuine diversification, to move away from phosphate sourced from Western Sahara.

We therefore encourage Ballance Agri-Nutrients to reconsider the trajectory suggested by its 2025 imports, to reaffirm its commitment to diversification, and to take concrete steps towards ending its reliance on phosphate rock sourced from Western Sahara for as long as the people of the territory have not been able to exercise self-determination.

We would appreciate receiving your response by 23 April 2026, allowing us to accurately reflect Ballance's position in our forthcoming publication.

Sincerely

Sara Eyckmans

Coordinator, Western Sahara Resource Watch

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