

Port Otago Limited
Att: Mr. Kevin Winders, Director
PO Box 8,
Port Chalmers 9050,
New Zealand

Brussels, 15.04.2026

RE. REQUEST FOR COMMENT – PORT OTAGO’S PARTICIPATION IN PLUNDER OF OCCUPIED WESTERN SAHARA

Dear Mr Winders,

We are writing to request comment regarding Port Otago Ltd’s role in facilitating imports of phosphate rock from Western Sahara into New Zealand.

We understand that Port Otago for several years served as a key entry point for shipments of phosphate rock sourced from the Bou Craa mine in Western Sahara, a territory recognised by the United Nations as Non-Self-Governing, without an administering power in place. As you will be aware, the territory is subject to the Saharawi people’s right to self-determination under international law - as concluded by the International Court of Justice, which also concluded Morocco’s claim to the territory to be unfounded.

In that context, we would welcome your response to the following questions:

1. What revenues (in NZD) has Port Otago Ltd earned from handling, unloading, storage, or related services connected to the trade of Western Sahara rock since 2016?
2. What steps, if any, has Port Otago Ltd made to secure the consent of the Saharawi people regarding the export of phosphate rock from their territory?
3. Has Port Otago engaged with the UN-recognised representative body of the people of Western Sahara, the Polisario Front, regarding these imports?
4. Has Port Otago conducted any internal or external assessment of the legal and ethical implications of facilitating trade involving natural resources from a Non-Self-Governing Territory under foreign military occupation? If so, could you provide details?
5. Is Port Otago considering any changes to its policies or practices in relation to handling goods sourced from occupied territories?

We are currently preparing a report and an article that will go into examining the role of various actors in the trade of phosphate rock from Western Sahara to New Zealand, and Port Otago’s involvement will be referenced.

More specifically, our coverage will refer to the role of the advisory firm Tūhana in legitimising and defending the trade.

We would therefore appreciate receiving your response by 23 April 2026.

We thank you in advance for your consideration and look forward to your reply.

Sincerely

Sara Eyckmans

Coordinator, Western Sahara Resource Watch

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