

5 February 2026

## ALENZ submission on the GREEN ECONOMY PARTNERSHIP AGREEMENT (GEPA).

The Aluminium Extruders Association of New Zealand (ALENZ) welcomes the opportunity to continue to contribute to the discussion of New Zealand transitioning to a fairer trading environment, which is fact based, referencing International Standards, where manufacturers of circular, low carbon solutions are rewarded.

### About ALENZ and the Aluminium Industry in New Zealand

The Aluminium Extruders of New Zealand (ALENZ) is made up of the five independent businesses that account for all aluminium extruded products manufactured in New Zealand.

New Zealand made aluminium extrusions provide low carbon, added-value manufacturing, supplying tailored solutions for building & construction, transport and marine sectors. Our members supply extrusions for the local manufacturing of residential windows, commercial building facades along with truck bodies for our transport sector and structural materials for our marine industry.

A highly durable metal, aluminium is 100% recyclable and can be recycled again and again without degrading its inherent value. It is estimated that nearly 75% of all aluminium ever produced is still in use today<sup>1</sup>.

The majority of the aluminium extruded in New Zealand is sourced from the NZAS smelter at Tiwai Point. Tiwai has one of the lowest aluminium smelting carbon footprints in the world generating 85% less CO<sub>2</sub>-e than the industry average<sup>2</sup>.

New Zealand is also fortunate to have an aluminium recycling/remelt facility at McKechnie Aluminium in New Plymouth, where 89% less carbon is emitted per kg than other aluminium extruders globally - achieving a carbon footprint (Scope 1 & 2) of 1.31kg of CO<sub>2</sub> per kg of aluminium. The global average is 11.5kg of CO<sub>2</sub> per kg of aluminium<sup>3</sup>.

New Zealand leads the world in low carbon, circular, aluminium extrusions and fabrication. However, New Zealand free trade agreements do not value these stunning "green" environmental credentials, nor do they acknowledge the significant value of local manufacturing which:

- delivers high value jobs in our regions,
- provides the capability/capacity for new innovations/industries and

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<sup>1</sup> <https://www.aluminum.org/sustainability>

<sup>2</sup> <https://nzas.co.nz/sustainability>

<sup>3</sup> <https://www.mckechnie.co.nz/sustainability>

- delivers resilience to essential sectors of the New Zealand economy when supply chains fail due to global pandemics or changing geopolitical events.

Your call for submissions sought feedback on six questions. ALENZ's responses are as follows

*1. What are the key economic opportunities and challenges with regard to sustainability, environment and climate change? What principles or priorities should guide the development of the GEPA?*

The key economic opportunities enabled through development of GEPA in our climate challenged world is growing the awareness of, and rewarding the investment in circular, low carbon manufactured solutions.

New Zealand, owing to its high component of renewable energy is well positioned to gain competitive advantage in a future marketplace where circular, low carbon footprints are recognised, rewarded and compete on a fair playing field with lowest cost.

The principles underpinning GEPA must be robust, science based and informed by existing/developing International Standards.

*2. What are the current and future barriers to accessing international markets for green goods and services from New Zealand, or to attracting investment for green transition activities?*

ALENZ can only comment with respect to locally manufactured goods.

Exports of New Zealand made low carbon extrusions have declined by over 50% in the last decade as our members struggle to compete with high embodied carbon extrusions manufactured in countries which largely rely on coal for energy.

In a post GEPA world, where the cost of high emissions is included as a cost of manufacturing, (by way of carbon tax), New Zealand manufacturers will be able to realise the competitive advantage of New Zealand's low embodied carbon manufacturing, particularly for aluminium extrusion exports.

Attracting new investment in green transition activities, will also require a robust energy policy framework delivering an abundant supply of affordable, reliable renewable energy to New Zealand Manufacturers.

*3. What environmental and climate standards and certifications for products, services and investment should be a focus for GEPA? How could GEPA promote alignment and coherence internationally?*

GEPA will need to be underpinned by a robust framework based on internationally recognised standards.

New Zealand manufacturers, particularly of building products are familiar with the following International Standards which should underpin GEPA:

- ISO 14040:2006 describes the principles and framework for life cycle assessment (LCA),

- ISO 14044:2006 specifies requirements and provides guidelines for life cycle assessment
- ISO 14025:2006 establishes the principles and specifies the procedures for developing Type III environmental declaration programmes and Type III environmental declarations.
- ISO 14001: 2015 provides the framework for an organization's Environmental Management System (EMS) to manage, measure, and improve environmental performance.

Shortcomings with life cycle Inventory data bases (local or global data) for the likes of energy and transport need to be resolved.

Similarly system boundaries need to be consistent - are we focused on cradle to gate (extraction to manufacture) or cradle to grave, or in aluminium's case cradle to cradle - the ultimate circular product.

*4. How could the GEPA promote greater collaboration between research and education institutions across borders to support green skills and innovation, and to commercialise new technologies that offer climate and environmental solutions?*

New Zealand needs to continue to grow our skills and capability in the future green economy to ensure we can deliver on our potential.

The Tertiary Education Committee is currently facilitating the establishment of eight new Industry Skills Boards (ISB). Ministry of Foreign Affairs and Trade should reach out to these ISB's to ensure the provision of skills training for the Green Economy.

ALENZ would be happy to facilitate this with members of the Manufacturing and Engineering ISB.

*5. How could GEPA complement existing environmental treaties and trade agreements (e.g. Paris Agreement, Convention on Biodiversity, Comprehensive and Progressive Agreement for Trans-Pacific Partnership, Agreement on Climate Change, Trade and Sustainability)?*

Embodied carbon and product circularity needs to be key components of new and existing trade agreements.

Or alternatively GEPA members could adopt the EU's approach of signalling the introduction of a carbon border adjustment mechanism, with a transition pathway in advance.

6. *How could GEPA reflect Māori interests and perspectives with respect to the environment and sustainable trade? What Māori provenance qualities and business practices could be better recognised internationally for their sustainability attributes?*

The Green Economy Partnership Agreement (GEPA) provides an important opportunity to recognise Māori perspectives within green manufacturing, not just primary industries.

New Zealand's aluminium extrusion sector is largely powered by renewable electricity, operates with high recycled content and circular material use, and supports long-life, low-carbon building systems.

These characteristics align strongly with kaitiakitanga and taiao cycles—the stewardship of resources, intergenerational thinking, and circular use of materials that underpin Māori environmental values.

GEPA should enable these attributes to be recognised within green trade cooperation, standards interoperability, and sustainable procurement, so that low-emissions, high-integrity manufactured products are not treated as commodities equivalent to high-carbon imports.

Our sector also employs a disproportionately high number of Māori in skilled, long-term industrial roles.

This reflects manaakitanga in practice—supporting whānau, regional communities, workforce development, and intergenerational capability in advanced manufacturing. Recognition of Māori workforce participation and social outcomes as part of inclusive green growth would ensure GEPA reflects a holistic sustainability model, where environmental performance, circularity, and Indigenous employment are all valued as legitimate attributes of sustainable trade.

Finally, ALENZ would like to take this opportunity to c0ok



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