# Consultation on updates to clause 2.16 notice

## Fonterra submission

1 September 2026

Fonterra welcomes the opportunity to comment on the Electricity Authority's consultation on updates to clause 2.16 notices.

Fonterra is a dairy co-operative owned by around 8,000 New Zealand farming families with manufacturing sites across the country, making us New Zealand's largest exporter and a major supplier to the domestic dairy market.

With manufacturing operations spread throughout New Zealand, Fonterra is one of the largest electricity users. We rely on stable and affordable access to electricity to support our operations. This reliable and affordable access underpins New Zealand's export competitiveness.

Fonterra supports enhanced monitoring of over-the-counter (OTC) electricity market interactions where it increases competition and improves transparency.

The proposed changes in the discussion document will capture Fonterra Commodities Ltd. Fonterra Commodities Ltd is a registered industry participant, as a trader of electricity and participates in the OTC market.

We are comfortable with reporting bids and offers made through Fonterra Commodities Ltd, in line with the proposed changes, and cannot identify any concerns with the collation and reporting that will be required.

Fonterra Co-operative Group Ltd (the parent company of Fonterra Commodities Ltd) on behalf of Fonterra Limited, purchases electricity through a retailer and, on this basis, is not an industry participant. Fonterra Ltd holds contracts for FPVV supply and is also not an industry participant. Some of these contracts are, however, captured under the Materially Large Contracts provision in the Code.

Based on the current proposal to update clause 2.16 notices, it does not appear that activities of Fonterra Co-operative Group Ltd or Fonterra Limited are captured.

We welcome further engagement with the Authority on the ongoing development and operation of the monitoring regime.

**ENDS**