



COVERSHEET

Minister	Hon Erica Stanford	Portfolio	Immigration
Title of Cabinet paper	Immigration Financial Sustainability and System Integrity Amendment Bill	Date to be published	10 April 2025

List of documents that have been proactively released

Date	Title	Author
3 April 2025	Immigration (Fiscal Sustainability and System integrity) Amendment Bill: Approval for Introduction LEG-22-MIN-0044 Minute	Cabinet Office
26 March 2025	Immigration (Fiscal Sustainability and System Integrity) Amendment Bill: Approval for Introduction	Office of the Minister of Immigration
26 March 2025	REQ-0009920 Immigration Amendment Bill: final Cabinet paper and Bill for lodgement	MBIE
24 February 2025	REQ-0009651 Immigration Amendment Bill - draft Cabinet paper and Bill for ministerial consultation	MBIE
12 February 2025	REQ-0008378 Immigration (Fiscal Sustainability and System Integrity) Amendment Bill - drafting decisions	MBIE
21 January 2025	REQ-0007504 Immigration (Fiscal Sustainability and System Integrity) Amendment Bill: Exposure draft feedback	MBIE
18 November 2024	REQ-0005172 Immigration amendment Bill: documents for release for targeted consultation	MBIE
13 November 2024	Immigration Amendment Legislation - Addition to Bill and Planning for Future Reviews ECO-24-MIN-0255 Minute	Cabinet Office
13 November 2024	Immigration Amendment Legislation - Addition to Bill and Planning for Future Reviews	Office of the Minister of Immigration
2 November 2024	REQ-0005823 Cabinet paper for lodgement: Immigration Amendment Legislation - addition to Bill and planning for future reviews	MBIE
24 October 2024	REQ-0005298 Draft Cabinet paper amending the definition of mass arrival	MBIE
8 October 2024	REQ-0004179 Immigration Amendment Bill – Mass Arrivals definition and transitional arrangements proposals	MBIE
20 September 2024	Immigration (Fiscal Sustainability and System Integrity) Amendment Bill: Policy Proposals ECO-24-MIN-0198 Minute	Cabinet Office
12 September 2024	Immigration Financial Sustainability and System Integrity Amendment Bill - policy proposals	Office of the Minister of Immigration
6 September 2024	2425-0891 Immigration Amendment Bill: Cabinet paper for lodgement	MBIE
22 August 2024	2425-0747 Immigration Amendment Bill: draft Cabinet paper for Ministerial consultation	MBIE
13 August 2024	2024-0352 Immigration Amendment Bill: draft Cabinet paper for feedback	MBIE
17 July 2024	2024-0286 Immigration Amendment Bill: update for meeting on 17 July 2024	MBIE

2 July 2024	2324-3802 Fiscal Sustainability Amendment Bill - update and key decisions	MBIE
4 April 2024	2324-2168 Proposed Immigration (Fiscal Sustainability) Amendment Bill: scope and timeframes	MBIE

<p>Information redacted</p> <p>Any information redacted in this document is redacted in accordance with MBIE’s policy on Proactive Release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it at this time.</p> <p>Some information has been withheld for the reasons of: national security or defence, privacy of natural persons, confidential advice to Government, information subject to an obligation of confidence, free and frank expression of opinion and legal professional privilege.</p>	<p>YES</p>
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BRIEFING

Immigration Amendment Bill: Cabinet paper for lodgement

Date:	6 September 2024	Priority:	Medium
Security classification:	In Confidence	Tracking number:	2425-0891

Action sought		
	Action sought	Deadline
Hon Erica Stanford Minister of Immigration	Agree to lodge the attached Cabinet paper and Regulatory Impact Statement package by 10am, 12 September 2024, for discussion at ECO on 18 September 2024	12 September 2024

Contact for telephone discussion (if required)			
Name	Position	Telephone	1st contact
Stacey O'Dowd	Manager, Immigration (Border & Funding) Policy	Privacy of natural persons	✓
Christine Hyndman	Principal Advisor, Immigration (Border & Funding) Policy	Privacy of natural persons	

The following departments/agencies have been consulted
The following departments/agencies were consulted on the Cabinet paper: Parliamentary Counsel Office; the Departments of Corrections, and the Prime Minister and Cabinet; the Ministries of Education, Foreign Affairs and Trade, Health, Housing and Urban Development, Justice (Courts, Offences and Penalties, Human Rights), Primary Industries, and Transport; Inland Revenue; the New Zealand Customs Service, the New Zealand Police, and the Treasury; and within MBIE: Employment Services, Immigration Compliance and Investigations, Immigration New Zealand; Tourism Policy, and Workplace Relations and Safety Policy (including Accident Compensation Corporation Policy).

Minister's office to complete:

- | | |
|---|--|
| <input type="checkbox"/> Approved | <input type="checkbox"/> Declined |
| <input type="checkbox"/> Noted | <input type="checkbox"/> Needs change |
| <input type="checkbox"/> Seen | <input type="checkbox"/> Overtaken by Events |
| <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn |

Comment



BRIEFING

Immigration Amendment Bill: Cabinet paper for lodgement

Date:	6 September 2024	Priority:	Medium
Security classification:	In Confidence	Tracking number:	2425-0891

Purpose

To provide you with:

- draft talking points (attached at **Annex One**) for the discussion at the Cabinet Economic Policy Committee (ECO) meeting on Wednesday 18 September 2024
- a Cabinet paper and Regulatory Impact Statement (RIS) package (attached at **Annex Two**) seeking policy decisions for the Immigration (Fiscal Sustainability and System Integrity) Amendment Bill (the Bill), for lodgement with Cabinet Office by 10am on Thursday 12 September 2024
- a tracked changes version of the Cabinet paper for your information, attached at **Annex Three**
- information on further policy work we are progressing in parallel, and
- a summary of the feedback received on the version circulated for ministerial comment (noting only the Minister for Corrections provided a formal ministerial response).

Recommended action

The Ministry of Business, Innovation and Employment (MBIE) recommends that you:

- a. **Note** that your office circulated the draft Bill Cabinet paper [2425-0747] to ECO Ministers, the Minister of Corrections, the Associate Ministers of Immigration, and coalition partners, seeking ministerial feedback by the end of Wednesday 4 September 2024

Noted / Discuss

- b. **Note** that feedback was received from both the Minister of Corrections and his Department, and has been addressed, Confidential advice to Government

[Redacted]

Noted / Discuss

- c. **Note** that officials are separately progressing policy work on the following topics, and will provide initial advice on them, including both the case for legislative change, and whether this Bill or the wider review would be the best vehicle for that change, by the end of October:

- i. Confidential advice to Government
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Noted / Discuss

d. **Note** that, from a procedural perspective, it would be preferable that any additional initiatives proposed for this legislation are included in the version of the Bill proposed for introduction

Noted / Discuss

e. **Note** that:

- i. draft talking points, to support you in your discussion at ECO, are attached at **Annex One**
- ii. the Cabinet paper and RIS package are attached at **Annex Two**, and
- iii. a tracked-changes version of the Cabinet paper is attached at **Annex Three**

Noted / Discuss

f. **Agree** that officials can provide a copy of the final Cabinet paper and RISs in confidence to targeted consultees later in 2024, shortly before they receive an exposure draft of the Bill

Agree / Disagree / Discuss

g. **Agree** to lodge the Cabinet paper and RIS package with Cabinet Office by 10am on Thursday 12 September 2024.

Agree / Disagree / Discuss

Stacey O'Dowd
**Manager, Immigration Policy
(Border and Funding)**
Labour, Science and Enterprise, MBIE

...6. / ..09. / 2024..

Hon Erica Stanford
Minister of Immigration

..... / /

An updated final version of the Cabinet paper is attached

1. Your office has circulated the draft Cabinet paper seeking policy decisions for the Immigration (Fiscal Sustainability and System Integrity) Amendment Bill (the Bill) to Cabinet Economic Development Committee (ECO) Ministers, the Minister of Corrections, the Associate Ministers of Immigration, and coalition partners [2324-0747]. We have also recirculated the draft paper to external agencies.
2. The attached version of the paper reflects feedback received, and has been updated:
 - a. to note that each RIS meets the regulatory impact analysis quality expectations
 - b. Confidential advice to Government [REDACTED]
 - c. with an updated figure for the number of allegations of premiums paid for employment between July 2020 and August 2024 (640 up from 198; in Annex Two, at page 22)
 - d. to slightly expand who would be captured by the premium offence (from just employers and their agents, to include a wider group of people who may be involved in the recruitment process), and
 - e. to note that you may also report back on expanding the definition of a mass arrival group, to include people who have travelled on a scheduled service, Confidential advice to Government [REDACTED]
3. The paper is ready for lodgement on 12 September 2024. There is time for further minor adjustments if you wish to do so before that date.

Possible additional legislative changes – update and next steps

4. Conversations are ongoing regarding possible additional legislative changes. The previous version of the paper noted that you may seek policy decisions early in 2025 on:
Confidential advice to Government [REDACTED]
[REDACTED]
[REDACTED]
5. Following your recent discussion with the Prime Minister and MBIE's Chief Executive, we have now added a further reference to possible legislative change, on page 6 and in recommendation 8. Both note that you have separately directed officials to provide advice on the best legislative vehicle to adjust the definition of a mass arrival, to include people arriving on a scheduled service (such as a commercial aircraft or a cruise vessel). This change is a priority for MBIE, and the recommendation notes that you may seek to include it in this Bill.
Confidential advice to Government [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
7. We propose to report back in more detail on all of these proposals by the end of October. The report back will provide you with advice on the case for legislative change and assess, for each proposal, whether this Bill or Confidential advice to Government [REDACTED] would be the best vehicle for that change.

8. We note that it would be preferable to make any changes intended to be captured by the Bill into the version proposed for introduction, rather than to plan to do so via Amendment papers. We will engage with Parliamentary Counsel Office (PCO) and Legal in the development of this advice.

The Minister of Corrections provided comment on the draft paper

9. The paper reflects the outcomes of ministerial consultation (with ECO members, the coalition partners, and the Associate Ministers of Immigration) undertaken between 26 August and 6 September 2024. Most Ministers did not provide formal feedback.
10. Your office received feedback from the Minister of Corrections (who is not on ECO). Confidential adv
[Redacted]
11. The Minister further noted that he is happy with that approach at this time, and asked that his Department of Corrections (Corrections) officials be closely involved in how this develops. (We have been working closely with them as we have developed the proposal, and will continue to do so). Confidential advice to Government
[Redacted]
12. The Minister of Corrections also observed that Corrections also has a strong interest in how any legislation for electronic monitoring is drafted, as it may impact on existing legislative requirements that Corrections oversees now. He advised that Corrections officials will, therefore, continue to be available to work with MBIE officials on this drafting, as relevant.

A range of agencies also provided further comment

13. Confidential advice to Government
[Redacted]
14. While most of the other agencies consulted had no additional feedback on this version of the paper, comments from five further agencies are summarised below. Those comments did not result in changes to wording, but some issues raised may come up in submissions to Select Committee. We will address them in the initial briefing to Select Committee and, if appropriate, in the Departmental Report.
15. The **Ministry for Pacific Peoples** referred to their previous comments, which expressed concerns about the impacts of potential cost increases on Pacific people in New Zealand and their families overseas.
16. The **Ministry for Ethnic Communities** noted that it supported the proposals to better address migrant exploitation and penalty provisions for offending employers, and to provide the Minister of Immigration with more flexibility to respond to emerging humanitarian crises and to grant visas without an application to groups of people, especially if it could benefit affected family members overseas.

17. Confidential advice to Government

[Redacted]

18. The **Ministry of Transport** noted the very broad scope of the proposed provisions enabling levy charging, and the considerations that would ideally be taken into account when decisions about who should be charged, and what that should be spent on, were made. It specifically referenced ports (which it noted are not in themselves risk exacerbators), and pilot training schools (which are also impacted by recent decisions to lift border processing and civil aviation fees). It noted that the introduction of a levy for such schools would be passed on to students, which could lead to schools in New Zealand becoming uncompetitive compared with counterparts in other countries.

19. The **Ministry of Health** noted that Health New Zealand could be exposed to significant costs if the levy payer base was expanded to include employers of migrants, and asked whether there would be a Crown exemption on levies where critical shortages were being filled. We advised that decisions were yet to be made, but noted that there was precedent for such targeted concessions, both in New Zealand’s immigration system and in congruent overseas jurisdictions.

We have updated the other external stakeholders who we informed of the proposals

20. We have had follow-up discussions with some external groups we have been advising during the process (Casey Review Focus Group and BusinessNZ), and have told them how their feedback has been incorporated into the proposals. We seek your agreement to releasing the Cabinet paper and RISs to key stakeholders later in the year, shortly before the exposure draft of the Bill is available. This is to contextualise the changes and support meaningful engagement on an exposure version of the Bill.

The paper should be lodged by 10am on Thursday

21. If you have no further changes, the Cabinet paper can be lodged at any point before 10am on Thursday 12 September 2024. As the RIS package is over the 35-page limit for attachments, we will prepare hard copies of it for ECO and provide them to Cabinet Office.

Next steps

22. Following ECO’s and Cabinet’s consideration of the proposals, we will work with MBIE Legal to develop drafting instructions for PCO by 1 October 2024, with a view to sharing the exposure draft of the Bill with targeted stakeholders before the end of the year.

23. The key milestones for the project to the end of 2024 are set out in the table below:

Table One: Upcoming milestones for the Cabinet paper

Date	Milestone
Monday 9 September 2024	Officials’ meeting
Thursday 12 September 2024	Lodge paper with Cabinet Office
Wednesday 18 September 2024	ECO consideration
Monday 23 September 2024	Cabinet consideration

Date	Milestone
1 October 2024	Drafting instructions provided to PCO
October 2024	Briefing/s on further proposals for legislative change
Early November	Briefing seeking agreement to provision of consultation material
Late November / early December 2024	Targeted consultation with stakeholders on an exposure draft.
Mid / late December 2024	Briefing on consultation feedback and advice on any changes to proposals.

Annexes

Annex One: Draft talking points for Cabinet Committee

Annex Two: Cabinet paper and Annexes - *Immigration (Fiscal Sustainability and System Integrity) Amendment Bill*

Annex Three: Tracked-changes version of paper: *Immigration (Fiscal Sustainability and System Integrity) Amendment Bill – Policy Proposals*

Annex One: Draft talking points for Cabinet Committee

High-level overview

- A priority for the immigration system is to achieve a funding model that is more efficient, self-funding, and sustainable.
- The Government is also committed to restoring law and order, ensuring regulatory systems work well, and upholding the New Zealand National Party and New Zealand First Coalition Agreement undertaking to *commit to enforcement and action to ensure those found responsible for the abuse of migrant workers face appropriate consequences*.
- To deliver on these priorities, I propose to make two broad sets of amendments to the Immigration Act 2009:
 - two changes to enable the immigration system to be more fiscally sustainable,
 - eight changes to better balance settings that support the immigration system's integrity with those that protect the rights of individuals.
- If Cabinet agrees to the proposals, I will issue drafting instructions that will see an exposure draft of the Immigration (Fiscal Sustainability and System Integrity) Amendment Bill available for targeted consultation towards the end of this year, and the Bill introduced to the House in the first quarter of 2025.

Fiscal sustainability proposals

- The first proposal is to expand the immigration levy payer base, so immigration system costs are more fairly shared across those that create the risks or receive the benefits of migration (currently only visa applicants are required to pay the levy).
 - This will enable the levy to potentially be more fairly charged to more groups. They could include Confidential advice to Government [REDACTED]
 - The rationale for potentially bringing Confidential advice to Government [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]¹
 - This proposal is **enabling only**, and the specifics of who exactly is charged, and how much, will be determined through a further fee and levy review in 2025, with new charges taking effect after the Bill has received Royal assent.
 - I am very mindful of imposing further costs on businesses. I've directed officials to consult with key stakeholders on an exposure draft of the Bill later this year, to better understand the extent to which businesses are already contributing to the visa costs of their workers, and also how to mitigate the possibility of new charges being passed on to migrants by employers or tertiary providers.

Confidential advice to Government [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- The second proposal is to create a new immigration levy-making power, to expand the purposes levy revenue can be used for.
 - This proposal is **enabling only**. It means that levy funding could, for example, contribute to investments in education (e.g. property, teacher training, specialist teachers or teacher aides), or health (e.g. people granted residence as parents could be levied noting their higher costs on the health system), where there are clear links to migrant usage or impacts.
 - I do not anticipate setting charges for such wider purposes before 2026 in order to work through these examples in detail and to allow proper mitigation of any risks (including challenges about the reasonableness and cumulative impacts of charges, and potential inconsistency with international tax commitments).

System integrity proposals

- The drivers to improve the integrity of the immigration regulatory system include implementing the recommendations of independent reviews, plugging gaps around migrant exploitation and deportation, and reintroducing useful flexibility into the system.
- The proposals are to:
 - require judicial warrants for out-of-hours compliance activity (recommended by Michael Heron KC)
 - update requirements for applications for individual warrants of commitment for asylum seekers (recommended by Victoria Casey KC)
 - provide more discretion for judges, so detention is not the only option if a person liable for deportation claims asylum (recommended by Victoria Casey KC)
 - establish electronic monitoring, as a lesser form of restriction of movement than detention (recommended by Victoria Casey KC)
 - enable residence class visas to be cancelled to manage security threats (to address concerns raised following the 2021 New Lynn Terror attack).
 - make it an offence to charge premiums for employment, irrespective of whether a worker has actively commenced employment (the current offence only captures people who are already working in New Zealand)
 - clarify that people who have pled or been found guilty of criminal offending are liable for deportation (currently deportation liability hinges on a criminal conviction), and
 - create powers, with appropriate safeguards, to efficiently manage large numbers of visa applicants where this is necessary to respond to situations that are unusual or outside the immigration system's control, and that pose operational challenges (e.g. the collapse of Air Vanuatu or the wars in Ukraine, Israel / Gaza). These powers could be particularly beneficial in situations where groups of people are stuck inside or outside New Zealand, and hold either no visa or visas that are expiring or have expired.

Financial implications

- Most proposals in this paper raise no immediate financial implications - the levy design changes are **enabling only**.
- Confidential advice to Government

Confidential advice to Government

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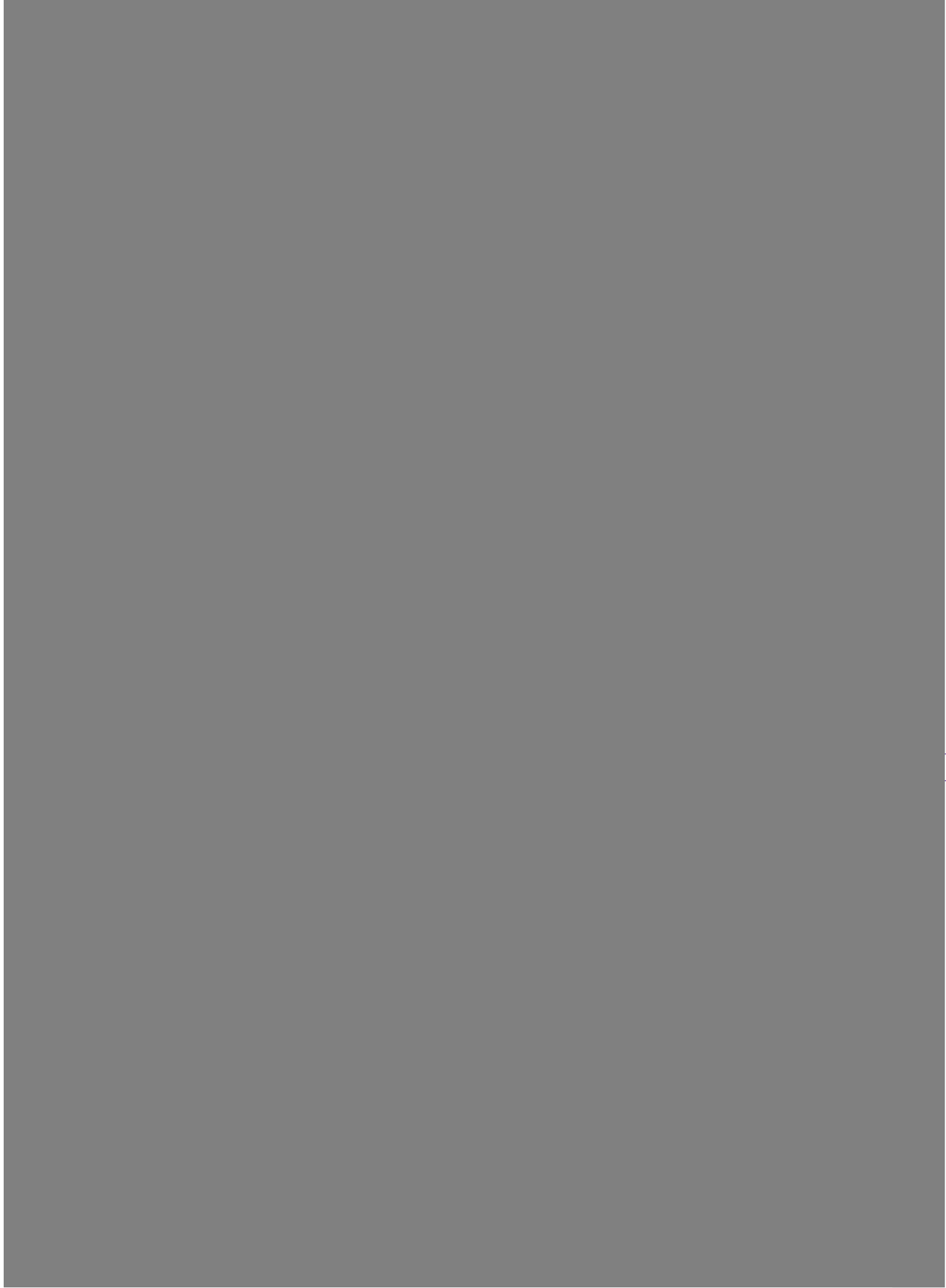
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