

Ground-based space infrastructure (GBSI): Webinar on protecting your business and New Zealand's national security (4 March 2026) – Q&A

At the webinar on GBSI we undertook to place on the website our responses to the questions that were asked by operators. These are set out below.

Application Process:

Q: What needs to be done by April?

A: Before submitting an application for GBSI authorisation, the priority is to:

- document your protective security arrangements
- document your partner due diligence processes

so they are both in place at the time of application. You can start this now.

We do not expect this to be very resource intensive, and documentation does not need to be extensive.

Protective security arrangements need to sufficiently show that:

- you are aware of the security risks that arise from the operation of GBSI (including personnel security, information security and physical security)
- you have measures in place to manage these risks.

Partner due diligence processes need to sufficiently show that:

- you have processes in place to know who your partners are and what activities they will undertake. This may include measures such as verifying the identity of customers and carrying out desktop research to ensure the information in the application is consistent with publicly available information.

Guidance on how to develop these processes can be found on our website ([Ground-based space infrastructure | Ministry of Business, Innovation & Employment](#)).

We encourage you to apply early to make sure your authorisation is in place by 29 July 2026, and to start your preparations as soon as you can.

Q: How long will it take to get an application approved?

A: Timeframes will depend on the volume of applications MBIE receives, but we estimate you should receive a response approximately four weeks after submitting a complete application.

Q: Will there be a template for completing applications?

A: There will be an application form on the MBIE website shortly after regulations are confirmed. We expect this to be in April.

Q: Is there a cost for this application?

A: No.

Q: When do I have to name researchers/collaborators and when will I need to update these names?

A: You will need to provide the names of your partners in your application. There will be a condition on your authorisation specifying the frequency at which you need to report (at least annually). In the case of a research collaboration, partners are the parties with whom you are collaborating in the research.

Q: Can construction or installation of GBSI take place before authorisation is granted?

A: An authorisation is needed to operate GBSI to carry out a regulated activity. It is not required to build or install GBSI.

Scope of Authorisation:

Q: What counts as an operator/is my operation covered by this regime?

A: You are an operator if you directly communicate with the GBSI or otherwise exercise direct control over the GBSI for the purpose of conducting a regulated activity.

Q: What is the definition of a space object?

A: The Outer Space and High-altitude Activities Act says that a “space object”, subject to any regulations made under section 88(1)(11) of the Outer Space and High-Altitude Activities Act, means—

- a) a launch vehicle that is launched, or is intended to be launched, into outer space; or
- b) a payload that is carried or launched, or intended to be carried or launched, by a launch vehicle into outer space; or
- c) the launch vehicle and the payload (if any) carried by the launch vehicle; or
- d) any component part of the launch vehicle or payload, even if—
 - i. the part does not reach, or is not intended to reach, outer space; or
 - ii. the part results from the separation of a payload or payloads from a launch vehicle after launch

Q: What kinds of conditions might be attached to GBSI authorisations?

A: Conditions might require you to report more frequently than annually, for example, or to not provide services to a certain partner.

Q: What is an example of a partner?

A: A partner can be a customer, client, or a research collaborator who you are providing services to (e.g. a satellite operator who you provide ground stations as a service to, or a university that you provide services to for the purpose of a research collaboration).

Q: What if there is more than one party involved?

A: Every operator needs to be authorised. If you are an operator providing GBSI services to partners, you will need to undertake due diligence on those partners.

Q: How does this affect my international network of stations?

A: This regime only applies to GBSI stationed in New Zealand. Overseas operators of New Zealand-based GBSI conducting regulated activities will need an authorisation. If you are in New Zealand and are conducting such activities using GBSI physically located overseas, you do not need an authorisation.

Q: Does this affect open-source ground station networks such as SatNOGS?

A: If you are carrying out a regulated activity you will require authorisation. The Act does not distinguish between open source and other forms of operation.

Exemptions:

Q: Does this apply to amateur radio operations (i.e. transmission or reception of amateur radio frequencies)?

A: The Act contains an exemption for an activity carried out as a recreational pursuit or hobby.

Q: Do the regulations apply to equipment used for satellite to mobile services?

A: If you are not carrying out a regulated activity then you do not require an authorisation.

Q: Will the Regulations apply to university activities/education programmes?

A: There is no exemption specifically for educational purposes. Whether or not an authorisation is required will depend on the nature of the activities the university is carrying out. For example, if the university project involves amateur radio, which is a recreational activity or hobby, an authorisation will not be required. However, if the project involves space situational awareness, this is a regulated activity and an authorisation will be required.

Due Diligence:

Q: What happens if I find something concerning with potential or existing partners? Do I cut ties, or try to manage the risk?

A: Not all concerning behaviour is serious, but what matters is whether you feel someone is being dishonest, placing inappropriate pressure on you, or otherwise acting in a deceptive, corruptive, or coercive way.

A helpful way to think about this is the SOUP test. If a person seems **Suspicious**, and their approaches are **Ongoing, Unusual** and **Persistent**, then this may indicate potential foreign interference or someone acting on behalf of another party.

If the behaviour appears suspicious, you should not accept the customer without first discussing the matter with the NZ Space Agency at nzspaceagency@mbie.govt.nz. You are also encouraged to get in touch with the NZSIS via the [Online Reporting Portal](#) at www.nzsis.govt.nz. Further guidance on protective security can be found on the Protective Security website (www.protectivesecurity.govt.nz).

Q: Are operators are required to submit their due diligence arrangements to MBIE?

A: No. MBIE does not carry out assessment of due diligence arrangements. It is the responsibility of the operator to meet the requirements of the Act. The Act requires the operator to declare that they have due diligence arrangements in place that meet statutory requirements. However, the Act enables MBIE to audit an operator's due diligence arrangements. MBIE is currently developing a policy about when audits will be undertaken.

Compliance:

Q: What happens if I don't comply with the requirements?

A: MBIE takes a graduated approach to compliance, beginning with education and familiarisation with requirements. We would start by making sure you were aware of your obligations.

MBIE and the Minister responsible for Space have a range of actions available if there is a pattern of non-compliance or a more serious issue (e.g. placing conditions on your licence).

In very serious cases the Minister can suspend or revoke an authorisation. Depending on the circumstances, the conduct might also amount to a criminal offence – these are detailed in Subpart 3 of the Act.

Further steps are available if that is not sufficient to manage a national security or other national interest risk:

- the Minister can give a disposal order requiring you to dispose of your interest in GBSI
- the District Court can make a forfeiture order which can make your equipment the property of the Crown.