



COVERSHEET

Minister	Hon Erica Stanford	Portfolio	Immigration
Title of Cabinet paper	Changes to Active Investor Plus Settings to Support New Zealand's Prosperity	Date to be published	23 June 2026

List of documents that have been proactively released

Date	Title	Author
8 May 2026	Changes to Active Investor Plus Settings to Support New Zealand's Prosperity	Office of the Minister of Immigration
13 May 2026	Changes to Active Investor Plus Settings to Support New Zealand's Prosperity ECO-26-MIN-0077 Minute	Cabinet Office
1 September 2025	Briefing: Active Investor Plus visa – Changes to the philanthropic investment class	MBIE
10 December 2025	Briefing: Active Investor Plus visa – Report back on options to incentivise philanthropy	MBIE

Information redacted

YES / NO (please select)

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.

Some information has been withheld for the reasons of Confidential advice to Government and Privacy of natural persons.



BRIEFING

Active Investor Plus visa – Changes to the philanthropic investment class

Date:	1 September 2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	0019413

Action sought		
	Action sought	Deadline
Hon Erica Stanford Minister of Immigration	<p>Indicate:</p> <ul style="list-style-type: none"> your preferred option(s) to incentivise philanthropic investments under the Balanced category, any changes to acceptable investment criteria you would like to progress, and your preferred timing for any changes to be progressed <p>Agree that MBIE consult externally to better understand the risks and opportunities in the philanthropy sector</p>	8 September 2025

Contact for telephone discussion (if required)			
Name	Position	Telephone	1st contact
Stacey O'Dowd	Manager, Immigration (Border and Funding) Policy	Privacy of	✓
Rian Walden	Policy Advisor, Immigration (Border and Funding) Policy	Privacy of	

The following departments/agencies have been consulted
Internally: Investment Policy, Operational Policy, Visa Operations, Stakeholder Engagement

Minister's office to complete:

Approved

Declined

Noted

Needs change

Seen

Overtaken by Events

See Minister's Notes

Withdrawn

Comments



BRIEFING

Active Investor Plus visa – Changes to the philanthropic investment class

Date:	1 September 2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	0019413

Purpose

To provide you with options to improve the philanthropic investment class available under the Balanced category of the Active Investor Plus (AIP) visa.

Executive summary

Demand for the AIP visa has been significant since settings were refreshed in April 2025. A number of charitable organisations are seeking further settings changes to incentivise investment in the philanthropic investment class. Only one investor migrant is known to have invested in philanthropy since the Investor categories were established.

There are two options likely to incentivise donations under the Balanced category of the AIP visa:

- Option 1 (recommended):** Reduce the investment period from five to four years if a \$5 million (or greater) donation is made to at least one charity at the beginning of the investment period. This is likely to be the most appealing option, as investors' primary motive is to obtain permanent residence quickly. However, it is more complex to implement than Option 2 (requiring system changes and updates to a form). There is a risk that property developers may demand the same incentive for property investments. **Con**
- Option 2:** Discount the investor's time in New Zealand requirements by offering the same conditional discounts for Balanced category investors who choose Growth category investments (a two-week discount for every \$1 million invested). This would be less complex to implement (minor system updates required). There is a risk that this option may disincentivise Growth category investments. This risk is partially mitigated by the assumption that interest in philanthropic investments will remain relatively low.

MBIE understands you also wish to tighten immigration instructions prescribing what constitutes an acceptable philanthropic investment, to ensure direct benefit to New Zealand. One option is to implement either an approved sector or exclusion list (or both to provide greater clarity to the market). Given the subjectivity inherent in deciding which charities to include/exclude, and to protect the visa's social licence, MBIE recommends consultation with philanthropic organisations to better inform any list.

You also have a choice about when you wish to progress any changes to philanthropy. While making changes at the earliest available opportunity is likely to be welcomed by philanthropic organisations, this would need to be traded-off against other implementation priorities (the ICT work programme has policy changes scheduled until mid-2026). MBIE considers that it may be beneficial to delay any changes till the 12-month review is completed, as a review of all the April settings changes in their totality may provide wider perspective.

Recommended action

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

- a **Note** that interest in encouraging philanthropic investment has increased since the April settings changes, although no donations are known to have been made under AIP to date *Noted*
- b **Note** that MBIE and the Minister of Immigration have received correspondence from several organisations seeking changes to AIP visa settings that would allow donations to be transferred from New Zealand charities registered overseas (which would enable tax benefits for AIP applicants in other jurisdictions), and that MBIE understands you do not want to enable this *Noted*

Alternative options to incentivise philanthropic investments

- c **Note** there are options to incentivise philanthropic investments under the Growth and Balanced categories, **Free and frank opinions** *Noted*
- d **Indicate** your preferred alternative option(s) to incentivise philanthropic investments under the Balanced category of the AIP visa, noting you could offer either one, or both, and that you can set alternative thresholds, if preferred

<p>[Option 1] Reduce the investor's investment period to four years if a \$5 million (or greater) donation is made to at least one charity (only if investment made at beginning of investment period) (recommended)</p>	<p><i>Agree / Disagree / Discuss</i></p>
<p>[Option 2] Discount the investor's time in New Zealand requirements, offering the same conditional discounts given to Balanced investors who choose Growth category investments:</p> <ul style="list-style-type: none"> i. \$11 million nominated (with at least \$1 million donated) = 91 days ii. \$12 million nominated (with at least \$2 million donated) = 77 days iii. \$13 million nominated (with at least \$3 million donated) = 63 days 	<p><i>Agree / Disagree / Discuss</i></p>

Changes to acceptable investment criteria

- e **Note** that MBIE understands you would like to tighten immigration instructions related to the philanthropic acceptable investment class to ensure that any investment aligns with the AIP visa's objectives, and to ensure the donation benefits New Zealand *Noted*
- f **Note** that joint ministers (the Ministers of Immigration, for Economic Growth and Trade and Investment, the latter replacing the Minister of Science, Innovation and Technology following the establishment of Invest New Zealand) are authorised to make changes to determine what qualifies as an acceptable investment, consistent with the following criteria:
 - i. investments are into New Zealand entities that clearly contribute to the Government's economic strategy (by being high growth potential firms or contributing to positive social and economic impacts),
 - ii. proper verification is conducted to ensure that the business is legitimate, and

- iii. investments do not prejudice New Zealand’s reputation as a responsible member of the world community [CAB-22-MIN-0162.01 and ECO-24-MIN-0290]

Noted

- g **Indicate** which of the proposed changes to immigration instructions you would like to progress to achieve the objectives outlined in **recommendation e**:

<p>[Implement an approved sector list] Funds can be donated to charities supporting one or more of the following sectors (circle any you wish to include in the list):</p> <ul style="list-style-type: none"> • arts, culture and heritage • care and protection of animals • child, youth and family services • education, training and employment • environment and conservation • health (eg disability, aged care, mental health) • human services (eg community development, emergency relief, housing, food) • justice • sport 	<p><i>Agree / Disagree / Discuss</i></p>
<p>[Implement an exclusion list] Funds cannot be donated to charities supporting any of the following sectors or causes (circle any you wish to include in the list):</p> <ul style="list-style-type: none"> • political parties • religious organisations 	<p><i>Agree / Disagree / Discuss</i></p>
<p>Donations must exclusively be used to benefit New Zealand-based causes (recommended)</p>	<p><i>Agree / Disagree / Discuss</i></p>

- h **Agree** that MBIE undertake external consultation with philanthropic organisations to better understand what risks and opportunities are associated with different parts of the sector, and that MBIE report back to inform further advice to joint ministers (per **recommendation f**)

Agree / Disagree

Timeframe for changes

- i **Indicate** when you would like any changes to philanthropy to be progressed

EITHER

- a. Following the 12-month review of the AIP visa (commencing December 2025 [0019272]) (**recommended**)

Agree / Disagree / Discuss

OR

- b. Ahead of the 12-month review (requiring reprioritisation of the ICT pipeline).

Agree / Disagree / Discuss

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

Hon Erica Stanford
Minister of Immigration

1/09/2025

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Under recent investor pathways, there has been one philanthropic investment

One investor migrant has made a philanthropic donation since 2009

1. Immigration New Zealand (INZ) is aware of one applicant across Investor 1 and 2 categories (the predecessor visas to AIP) who nominated a philanthropic donation to meet visa criteria since 2009 (when those visa categories were established), and is not aware of any philanthropic donations being made under the AIP visa since it was established in 2022.¹
2. During consultation on the recent (April) policy changes, MBIE spoke with a number of wealth management firms. They noted that while investor migrants typically contribute to philanthropic causes, they are more likely to either start their own charities or make donations once they are fully settled in New Zealand (with permanent residence) and have developed strong community networks (ie after their immigration investment period has ended).

Following the success of the revised settings, some charities have requested that more is done to encourage philanthropy

3. As at 29 August 2025, there is \$1.85 billion of potential investment in the pipeline, and 65 applications have been made under the Balanced category (under which philanthropy is an option).² The majority of investment made by Balanced category investors has been directed into bonds (about 73 per cent).
4. Since 1 April, MBIE has received correspondence from several New Zealand charities, **Confidential information entrusted to the Government**

There have been requests to enable investments to be transferred from New Zealand charities registered overseas

New Zealand charities are registered overseas (particularly in the United States of America) to incentivise donations

5. A small number of organisations with charitable interests have proposed permitting donations to be made via:
 - a. a Donor-Advised Fund (DAF),⁴ **or**
 - b. an entity established solely to benefit a New Zealand charity (eg a 501(c)(3) entity).⁵
6. If permitted, the proposal would enable investors (namely those from the United States of America, the AIP visa's largest applicant source market) to make donations to New Zealand charities via overseas entities and benefit from overseas tax deductibility settings (reducing the true cost of permanent residence to the investor).

¹ It is possible that some investor migrants may have made philanthropic donations under either the previous or new settings, though this will not be known until compliance (section 49) checks are undertaken. However, we consider this to be unlikely given philanthropic investments have been historically unpopular.

² Philanthropy is not available to Growth category investors.

³ **Confidential information entrusted to the Government**

⁴ This is a vehicle that facilitates charitable giving at a donor's convenience. The donor places money into the fund, receives an immediate tax deduction, and their money remains in that fund (and can be invested to grow the sum further) until the donor advises / recommends a charity to receive some or all of the money.

⁵ A 501(c)(3) entity is a United States charity. Donations made to these are tax-deductible for donors.

7. The view from the New Zealand charities that have written to you and MBIE is that unless this transfer option is enabled, philanthropy is unlikely to become an attractive option for investors. MBIE understands that this is because unless an investor is a New Zealand tax resident (which is unlikely), they are not entitled to claim any tax benefit by making the same donation to the charity's New Zealand branch. Confidential information entrusted to [REDACTED]

[REDACTED]

8. Donations to overseas-based branches of New Zealand charities (or DAFs established/operated by them) are not permitted under current immigration instructions. This is because instruction [BN8.10\(c\)](#) specifies a limited number of acceptable channels that funds can be transferred to New Zealand through, intended to minimise the risk of money laundering and support efficient visa processing. In discussion at your weekly officials meeting on 11 August, you confirmed that instructions should not be amended to facilitate either of the approaches suggested.

We have explored options to incentivise philanthropic investments

9. The success of the revised AIP settings presents an opportunity to harness the current attractiveness of the visa to incentivise social investments through philanthropy.
10. MBIE understands that given current cost of living pressures, there is also a higher demand from charities for funding to support the continued delivery of services. Incentivising philanthropic investments is one way the Government can support this gap and continue to encourage charitable giving.⁶
11. It is unlikely that the philanthropic investment class will gain considerable momentum unless compelling incentives are offered to investors. The options MBIE considers most likely to encourage philanthropy are outlined in **Table 1** below (under the Balanced category). Due to the historical lack of interest in philanthropy, the volume of donations expected to be made under revised settings remains unclear.

Growth category options

12. You previously asked officials to consider enabling Growth category investors to make philanthropic investments up to \$1 million (20 per cent of their \$5 million investment required) to increase interest in philanthropy, while continuing to incentivise investment that will grow New Zealand's economy.
13. Free and frank opinions [REDACTED]

Balanced category options

14. You could choose to implement either of the options below. Both would likely offer a greater incentive. While we have suggested thresholds for both options in **Table 1**, you could choose to set these differently.

⁶ In December 2024, the Minister for the Community and Voluntary Sector launched the [Twelve Days of Giving campaign](#) alongside Philanthropy New Zealand to encourage charitable giving.

15. MBIE considers the option to **reduce an applicant’s investment period to four years where they have made a \$5 million (or greater) donation upfront** would provide a stronger incentive than option two (if your preference is to offer one incentive), given investors’ primary motive is to obtain permanent residence as quickly as possible. However, this option is more complex to implement and cannot be done quickly given the current ICT implementation programme and resources.

Table 1: Assessment of options to stimulate philanthropic investment under the Balanced category

Options	Benefits	Risks	Complexity to implement
<p>[Option 1] reduce the investor’s investment period to four years if a \$5 million+ donation is made to at least one charity (only if investment made at beginning of investment period)</p>	<p>Offers a faster pathway to permanent residence than any other acceptable investment class under the Balanced category, providing significant incentive to all investor migrants</p>	<p>May attract criticism from property developers given the potency of this incentive (noting the property development investment class has not attracted any investment to date). Confidential advice [Redacted] [Redacted] [Redacted] [Redacted] [Redacted] [Redacted]</p>	<p>More complex to implement than Option 2, requiring system updates and changes to an online form</p>
<p>[Option 2] discount the investor’s time in New Zealand requirements (from 105 days). The same conditional discounts given to Balanced investors who choose Growth category investments would apply:⁷</p> <p>\$11 million nominated (with at least \$1 million donated) = 91 days</p> <p>\$12 million nominated (with at least \$2 million donated) = 77 days</p> <p>\$13 million nominated (with at least \$3 million donated) = 63 days</p>	<p>Allows investors to spend less time in New Zealand, incentivising investor migrants who see themselves as ‘global citizens’ who are hesitant about the risk associated with direct and managed fund investments</p>	<p>May undermine the same incentives provided to encourage investors to make more economically productive investments (where there is a clear investment gap). This is partially mitigated by historically low interest in philanthropy and the assumption that interest will remain relatively low</p>	<p>Less complex to implement than Option 1 as only minor system updates are required</p>

⁷ For each additional \$1 million Balanced category applicants invest in acceptable Growth category investments (beyond the minimum \$10 million required) they can reduce the total time they must spend in New Zealand by 14 days (up to a maximum reduction of 42 days). Applicants must include these funds in their nominated funds prior to their application being approved in principle.

Amendments to acceptable investment instructions to maximise the benefits of philanthropic investments

16. The immigration instructions for philanthropy state that to qualify as an acceptable investment, funds must be donated by the investor migrant to organisations that:
 - a. are a registered charity with at least two years of annual returns, and
 - b. have current Inland Revenue donee status ([BN7.10.5](#)).
17. MBIE understands that this threshold, which is the most permissive of any AIP investment class, is a result of the historical lack of interest in philanthropic investments. Given the increased interest in philanthropic investment, it is timely to consider amendments to instructions to ensure that any future investment aligns with the visa's objectives and is spent here, benefiting appropriate New Zealand-based charities.
18. MBIE's initial view is that this could be achieved by updating philanthropy's acceptable investment instructions to (in addition to existing settings) require that, for example:
 - a. The funds must exclusively be used to benefit New Zealand causes (avoiding funds being received by charities that have a New Zealand branch that are then moved either partly or wholly offshore to support overseas causes).
 - b. Funds can only be donated to charities supporting one or more of the following sectors:
 - i. arts, culture and heritage,
 - ii. care and protection of animals,
 - iii. child, youth and family services,
 - iv. education, training and employment,
 - v. environment and conservation,
 - vi. health (eg disability, aged care, mental health)
 - vii. human services (eg community development, emergency relief, housing, food),
 - viii. justice, and
 - ix. sport.
 - c. Charities supporting the following could be excluded:
 - i. political parties, and
 - ii. religious organisations.
19. You may wish to implement either an approved sector or exclusion list (as above) or have both to provide greater clarity. You also have choices to make about which sectors/causes you wish to add or remove from either of these lists, depending on your preferences. However, the Ministers for Economic Growth and Trade and Investment will also need to agree to any amendments to philanthropy's acceptable investment instructions, consistent with their authorisation to make changes to determine what qualifies as an acceptable investment [CAB-22-MIN-0162.01 and ECO-24-MIN-0290 refer].
20. MBIE considers that there is likely to be an economic benefit associated with permitting donations to be made to any of the sectors included in the above list. However, the scale of the benefit is likely to vary based on the specific causes that ultimately receive funding.

21. Given the subjectivity inherent in deciding which charities to include/exclude and to protect the visa's social licence, MBIE recommends (if you agree to update instructions) consultation with philanthropic organisations to better understand what risks and opportunities there are in having lists like those above.

Timeframe for changes

22. A 12-month review of the April changes to the policy settings of the AIP visa is scheduled to commence in December 2025 [0019272]. This will focus on whether the changes made are fit for purpose and aligned with broader government objectives and reforms [ECO-24-MIN-0290]. You can either delay any changes to philanthropy until after this review occurs or seek to introduce them earlier by reprioritising other policy changes in the pipeline.

MBIE recommends progressing changes as part of the 12-month review process

23. There is a risk that in seeking to make more immediate changes to philanthropy, MBIE will forego the benefits offered by conducting a single and simultaneous review of the April changes in their totality that may provide additional perspective to any possible revisions. Given the investment class has not attracted any known investment since the AIP visa was implemented in 2022, urgent updates to tighten settings are not required.
24. If your preference is to implement the changes proposed in this briefing ahead of the 12-month review, this would require the reprioritisation of other policy changes in the pipeline, for example the Skilled Migrant Category and Business Investor Visa. The ICT work programme currently has policy changes scheduled through until at least mid-2026. However, implementation timeframes can be provided later if this is your preference.

Next steps

25. We seek your preferred direction on options to incentivise and tighten philanthropy settings under the Balanced category and timing. Subject to your agreement MBIE will engage with the philanthropic sector on changes to immigration instructions. MBIE is also speaking with the Department of Internal Affairs later this week and can discuss the options proposed.
26. If you agree, MBIE will report back to you with further advice regarding potential changes to philanthropy's acceptable investment instructions.