



COVERSHEET

Minister	Hon Erica Stanford	Portfolio	Immigration
Title of Cabinet paper	Outcomes of the 2026 Recognised Seasonal Employer Scheme Policy Review	Date to be published	5 August 2026

List of documents that have been proactively released

Date	Title	Author
July 2026	Outcomes of the 2026 Recognised Seasonal Employers Scheme Policy Review	Office of the Minister of Immigration
1 July 2026	Outcomes of the 2026 Recognised Seasonal Employers Scheme Policy Review ECO-26-MIN-0120 Minute	Cabinet Office
5 March 2026	2026 RSE Policy Review - Proposed scope and consultation	MBIE
11 March 2026	Industry recommendation for consultation - Accommodation settings industry proposal March 2026 FINAL	Industry, provided to MBIE
14 May 2026	Recommendations following the 2026 Recognised Seasonal Employer Scheme Policy Review	MBIE

Information redacted

YES

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 and that would outweigh the reasons for withholding it.

Some information has been withheld for the reasons of confidential advice to government, international relations, legal professional privilege, privacy of natural persons, and free and frank opinions.

RSE Accommodation settings Industry proposal March 2026 FINAL

This accommodation settings proposal sits separate to the MBIE developed accommodation cost methodology. Whilst they are related – this document should be considered on its own merits. The proposed graduated compliance model compliments these proposed settings.

1. Why change is needed

The RSE scheme was designed to create a "triple win" for employers (by providing experienced, reliable labour to enable industry growth); workers (by providing enhanced income and employment opportunities); and Pacific nations (by supporting economic development through remittances and skills transfer).

However, as identified in previous policy work by government (and by industry), many aspects of the scheme have failed to keep up with its growth. This structural failure has been compounded by emergent challenges for employers including extreme weather events, rapidly expanding costs, critical processing delays and a lack of transparent decision making in certain areas of Government.

That the scheme is no longer fit for purpose, is illustrated by the number of employers that have decided to exit the scheme in recent years, as well as a reduction in the numbers recruited from the Pacific. This trend doesn't just threaten the ability of the horticulture and viticulture industries to sustain growth. It affects the ability of the Government to achieve its export targets and capitalise on emerging markets (e.g. India FTA), the ability of workers to realise increased earnings and quality of life in their home countries, and the value of the RSE scheme to Pacific Governments as a driver of economic development.

This trend will continue if action is not taken and is already affecting the ability of the RSE scheme to realise its 'triple win' objective and the schemes resilience. This is demonstrated in Dr Richard and Dr Charlotte Bedford's paper 'How have in-country numbers of seasonal workers recruited for the RSE scheme and short-term PALM scheme been tracking since July 2023?'¹. Certainty around RSE settings is vital to maintain workforce stability and support the sector's continued growth and resilience as well as employer investment (i.e. in accommodation).

2. Economic Importance of the RSE Scheme

The RSE scheme is a cornerstone supporting the Government's goal to double export value. The horticulture and viticulture sectors contribute over \$8b^{2 3} in export revenue annually. The RSE scheme also fosters regional job creation, encourages grower investment and innovation, and upholds ethical employment practices. By underpinning the sector's economic sustainability, the scheme helps to preserve New Zealand's status as a leading export earner. The RSE scheme supports the development of an industry that is both attractive and responsible for pastoral care of workers.

In the Aotearoa Horticulture Action Plan¹, Key Priority 5.2: *enable right person, right place: establish policy settings and legislation to meet labour needs* sets out an action to "review the Recognised Seasonal Employer scheme with a long-term lens to address issues and provide certainty of settings for this vital programme". The outcome of this action is that "the RSE scheme is fit for purpose and beneficial for all involved". As one of the quad-partners of the Action Plan and the

¹ [Aotearoa Horticulture Action Plan | Horticulture New Zealand — Ahumāra Kai Aotearoa](#)

entity responsible for New Zealand's immigration system, this outcome cannot be achieved without the Government's involvement.

Labour, particularly the seasonal workforce, is as a key enabler of growth. As such, policy stability through the RSE scheme is critical. Reaffirming the scheme's relevancy and continuity aligns directly with the priority of enabling the right person in the right place, and safeguards growers' ability to invest, plan and manage risk in a sector where labour continuity underpins its domestic and export performance.

3. Purpose of this document

This document has been drafted for the Employment, Skills and Immigration Policy (ESIP) team conducting the ongoing RSE policy review work, to outline the perspectives of RSE scheme employers and to help inform policy work that industry would like to see concluded by April 2026.

A working group of 20 RSE scheme employers met in mid-October 2025. The purpose of this meeting was to confirm the top priorities for RSE employers – given policy reviews in various forms have been ongoing since 2019. Three key priorities were identified:

1. A suitable transport cost recovery methodology
2. Ensuring RSE policy alignment and consistency
3. Implementing workable accommodation settings

3.1 Principals

When considering accommodation settings industry took into account the following principles:

- **Consistency with International Frameworks**
Policy settings should consider international standards and guidance, such as those from the International Labour Organization and the World Bank.
- **Clarify Labour Inspectorate (LI) Role**
Clearly define the mandate of Labour Inspectors in approving and inspecting accommodation to ensure consistency, proportionality, and regulatory clarity.
- **Transparent, actual and verifiable accommodation costs**
Accommodation charges should be based on actual, verifiable costs using a clear and consistent methodology.

4. Overview of this proposal

- Current policy state
- National and International comparisons
- Industry proposal

4.1 Current RSE accommodation standards add unnecessary complexity and cost

The key policy issue relating to the RSE accommodation standards is the level of complexity imposed by bespoke RSE settings. With respect to RSE worker accommodation, employers are already subject to a broad range of standards and minimum requirements, including:

- The Housing Improvement Regulations 1947,
- The Healthy Homes standards,
- The New Zealand Building Code, and
- a range of regionally specific council standards (including requirements for building warrants of fitness).

The regulatory regimes listed above apply a legal standard that is considered satisfactory for all other accommodation (both residential and commercial) for the purposes of habitation by either New Zealand or migrant workers.

However, uniquely within the immigration system, in addition to the existing legal standards the RSE scheme also imposes a range of accommodation requirements over and above these general requirements, including across many areas that are already covered by existing rules. No other employers seeking work visa holders, whether AEWV, working holiday or other work visas, are subject to such requirements.

From a policy and operational perspective, it is unnecessary, costly and makes little practical or financial sense to have bespoke RSE accommodation standards. These standards create unintended consequences – adding extra layers of compliance and significant uncertainty (related to the assessment of standards by Labour Inspectors) that in turn negatively impact investment decisions by employers.

The RSE scheme has ~170 employers, with a stable pool of accommodation that has generally been considered satisfactory during the scheme's long history (almost 20 years). Industry strongly shares the Government's concern relating to any accommodation that is not up to an acceptable standard. However, the current regime either duplicates or places additional requirements that depart from acceptable standards elsewhere in relation to worker accommodation. In practice, government, industry and RSE workers do not gain from the heavy administrative burden of the current system.

Accommodation standards emerged from dated WorkSafe guidance documentation that does not reflect the reality of RSE's as large scale accommodation providers

Current RSE accommodation standards were based on a 2014 WorkSafe document relating to farmhouses (with small numbers of people such as shepherds and dairy farm workers).² In 2016, these guidelines were compiled into a factsheet.³

This factsheet was explicitly prefaced as "... interim general guidance ... based on previous guidance about farm worker accommodation".

This guidance has been stretched far beyond its original intended purpose (which was a time limited guidance document for an entirely different industry, which expired in 2018) and became integrated as the minimum standard of RSE accommodation standards, without RSE employer or Pacific consultation. These standards are now applied by the Labour Inspectorate (LI) using the employer accommodation self-audit checklist, and through LI recommendations to INZ on the approval of ATRs.

Critically, these standards were never designed or intended to replace existing legislation and standards, or New Zealand's Building Code. The application of such standards has never been appropriate for the many different types of accommodation within the RSE scheme accommodation.

In 2019 Minister Galloway directed that employers could not house RSE workers in residential accommodation (urban environments) which fundamentally changed the nature of RSE

² <https://www.worksafe.govt.nz/dmsdocument/125-managing-health-and-safety-a-guide-for-farmers>

³ <https://www.worksafe.govt.nz/dmsdocument/857-worker-accommodation>

accommodation. Industry agreed to take pressure off urban accommodation by constructing purpose build accommodation for RSE workers for use 7 out of 12 months. For many major growing regions - council consents on RSE accommodation have restriction meaning the accommodation can **only** be used for RSE workers. This has material financial ramifications.

The current RSE Accommodation Standard has never been fit for purpose and is a key reason why there is a reduction in the number of RSE bed numbers available. Many of the current requirements make no sense and are very capital expensive.

There are also a wide range of different accommodation types including purpose built, rural and residential houses, motels and residential boarding houses / billeting.

4.2 National and International comparisons

The administrative burden uniquely placed on employers by the RSE scheme is evident when considering comparisons to settings within the broader New Zealand immigration system, and international best practice.

New Zealand visa pathways comparison

Other work visas place no requirements on accommodation provided to workers (outside arrangements made between employers and workers on their own accord), the standards for which are already governed by New Zealand employment law and general accommodation standards:

Visa Type	RSE	AEWV	PSV	SSE
Purpose	Seasonal labour for horticulture and viticulture, 7 / 9 months in length.	Skilled or specialist full-time roles.	Peak seasonal roles up to 7 months in length.	Short-term seasonal labour for people already in NZ.
Pastoral Care	Yes – extensive requirements. E.g. Airport pickup, provide worker transport, facilitate health access etc.	No – aside from general AEWV requirements on information provision (such as how to access healthcare, banking, tenancy rights and employment support).		No
Accommodation	Yes - must provide accommodation that meets unique RSE standards.	No requirements		No requirements

RSE is available to Horticulture and Viticulture only and is confined to the Pacific and Timor Leste. It is for unskilled roles and workers are unable to advance to more senior roles

PSV explicitly excludes Horticulture and Viticulture and provides for all the other primary sectors who can train workers from anywhere in the world and progress them to higher visa classes including GWSV or AEWV. Current immigration policy disadvantages both an entire industry and the Pacific.

New Zealand Building regulations and other standards are already clear with respect to amenities, without the need for separate RSE standards

The New Zealand building code sets clear expectations with regards to toilets, showers and other key aspects of accommodation.⁴ This includes accommodation types that are analogous to RSE accommodation, like boarding houses, which have clear rules relating to amenities:

Hotels, hostels, motels, prisons, boardinghouses	Occupants	1 – 8 9 – 20 >20	1 2 add 1 per 10	For each <i>accessible</i> unit: One <i>accessible</i> shower
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However, current RSE minimum requirements impose a different standard, requiring a ratio of 1 shower per 7 persons:⁵

Section G	Washing facilities
G1. There should be sufficient hand basins with sufficient hot and cold water capacity given the number of residents. G2. There should be sufficient baths or showers given the number of residents. The ratio is to be at least 1 bath or shower per 7 persons. However, the Territorial Authority requirements may differ dependent on accommodation type and set-up. It is therefore necessary to ensure that RSE employers contact their local TAs to discuss. G3. Each shower should have an attached dressing area. Each compartment (shower and dressing area) should have a floor area of at least 1 m².	

This example of double standards exist throughout the RSE accommodation requirements. That RSE accommodation standards impose additional requirements on top of these existing standards means MBIE is holding RSE employers to a more rigorous standard than any other employer in the immigration system, and New Zealand's general rules regarding accommodation.

When comparing to Australia's PALM scheme, RSE is highly prescriptive

With respect to the requirements for facilities and the ability of employers to ensure costs are covered, Australia's PALM scheme has more permissive settings than RSE:

	PALM	RSE
General framing	Features requirements like: - Fair and good value - Security bond - Transparency of costs - Fit for purpose and in good condition - Accessibility, safety and security - Suitable sleeping quarters and arrangements - Adequate bathroom facilities - Leisure, social and telecommunication facilities	Highly prescriptive, including details like: 4.5m² per person in bedroom 1.1m² per person for dining with capacity for ALL workers to dine at the same time (makes little sense when some accommodation contains hundreds of workers). - No collection of rental bonds allowed

⁴ [Toilet calculator | Building Performance](#)

⁵ [INZ RSE accommodation standards](#)

Example: Washrooms	Adequate bathroom facilities required. For every 10 workers: • one toilet • a hand basin and • a shower, or bathtub with shower facilities.	More restrictive requirements. For every 7 workers: • one toilet • a hand basin and • a shower
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The focus on highly specific standards, is undermining the competitiveness of New Zealand RSE compared with the Australian PALM scheme, by layering additional compliance burdens on New Zealand employers.

4.3 Industry proposal – remove the prescriptive settings and return to outcomes focused policy

RSE accommodation settings should not be reduced to rigid technical measurements – settings should be pragmatic and practical. Employers strongly believe accommodation settings should focus on:

- culture
- dignity
- wellbeing
- privacy
- reasonable cost and transparency

Employers do not wish to reduce the standards of accommodation, instead make settings sensible and practical. To do this employers seek to work with the Pacific to enable a balance to be struck between costs needed for investment and the need for accommodation to be warm, dry and comfortable.

Utilise New Zealand's existing building standards

RSE accommodation standards should align with existing New Zealand laws and regulations that apply to other accommodation providers (e.g., building WoFs, fire regulations, Healthy Homes standards), rather than creating bespoke rules specific to RSE accommodation. Regional Council laws for each accommodation must be met. This includes ratios of showers, toilets and other sanitary services for the specific accommodation type. RSE requirements should be the same as New Zealanders.

Benchmark against International Frameworks and comparable schemes

Policy settings should consider relevant international standards and guidance, such as those from the International Labour Organization and the World Bank (which in general, apply a much less prescriptive position in relation to accommodation). Also take into consideration how accommodation standards operate within Australia's PALM scheme, as RSE employers compete directly with Australia for workers from the same nations.

Clearly define operational roles and aim for effective, outcomes focused compliance

- Clearly define the scope of the Labour Inspectors mandate to simply verifying accommodation via physical visits, to ensure it aligns with what employers have stated in their ATR applications.

- Ensure that INZ is the full and final decisionmaker with respect to accommodation, and that any standards align with New Zealand national rules and regional standards.
- Move toward risk and outcomes-based regulation rather than prescriptive “lowest common denominator” rules (e.g., square meter measurements and utensil counts).
- Redirect compliance resources toward proactive, regional audits that trade paper-heavy assessments of accommodation based on photos, with in-person visits to accommodation using the time saved.

Simplify, and remove the red tape from the accommodation approval process

Industry proposes a simple, one point of contact accommodation plan and checklist to be completed alongside an employer's RSE status application or renewal, unless accommodation had changed in the interim. The key feature of this checklist includes an employer declaration that the accommodation meets all relevant / applicable New Zealand accommodation standards and building codes and has received a fully independent assessment that the accommodation is Healthy Homes compliant (by 2030).

A draft template for such a checklist is attached at Appendix One.

Cultural considerations and reporting mechanisms

Many employers have long-standing relationships with Pacific communities and actively account for cultural considerations when constructing and modifying accommodation. On occasion, strict accommodation requirements applied to RSE do not always align with culturally competent accommodation considerations.

However, industry recognises the need to ensure workers are satisfied with their accommodation, and that some workers may not feel incentivised to raise issues, not least given the cultural differences between the Pacific and New Zealand. As such, in addition to the changes outlined above, industry proposes a reporting mechanism through regular worker voice surveys to ensure accommodation suitability, and to elevate the worker voice in the scheme. Such a survey could be conducted through well-established companies such as 'Ask your team' or Just Good Work. These surveys would provide a valuable feedback mechanism for employers and enable the scheme's broader administrative functions to more effectively target non-compliance or issues. Industry welcomes the opportunity to work through this with MBIE and sending nations to design robust survey questions.

Appendix 1

RSE accommodation plan and check list

For each of the below – briefly describe how the facilities meet the needs of the workers and adhere to the principals of accommodation that preserves workers culture, dignity, wellbeing, privacy for a reasonable cost.

Note: some of the below may not be met or applicable to some types of accommodation. The employer must submit a robust case in check list items cannot be ticked.

An example maybe healthy homes where exemptions are possible: [Residential Tenancies \(Healthy Homes Standards\) Regulations 2019 \(LI 2019/88\) \(as at 25 September 2025\) – New Zealand Legislation](#).

Accommodation Checklist

Certification & Compliance

- ☐ Healthy Homes Independent Certificate (by 2030)
 - ☐ Building Warrant of Fitness (documented proof)
 - ☐ Fire safety inspection certificate
 - ☐ Evacuation plans in place
 - ☐ Fire wardens appointed
 - ☐ Compliance with regional bylaws
-

Facilities & Amenities

- ☐ Washing facilities
 - ☐ Adequate bathroom/shower/toilet facilities
 - ☐ Communal and recreation spaces appropriate for number of residents
 - ☐ Outdoor areas provided
 - ☐ WiFi/communications provided
-

Bedrooms & Personal Living Spaces

- ☐ Bedrooms furnished with:
 - ☐ Beds
 - ☐ Mattresses
 - ☐ Bedding
 - ☐ Cupboards/drawers/wardrobes
 - ☐ Wardrobes/drawers
 - ☐ Secure location for valuables
 - ☐ Bed capacity appropriate for comfortable stay (up to 7 months)
-

Kitchen & Dining

- ☐ Kitchen configuration suitable for number of residents
 - ☐ Cooking facilities provided
 - ☐ Adequate cooktop-to-resident ratio (council compliant)
 - ☐ Adequate washing machine-to-resident ratio (council compliant)
 - ☐ Dining area provided
 - ☐ Adequate dining equipment and utensils
 - ☐ Food storage available
 - ☐ Fridge storage available
-

Storage

- ☐ Storage for personal belongings
-

Maintenance & Operations

- ☐ Cleaning, repair, and maintenance plan (evidence provided)
- ☐ Rubbish and recycling disposal
- ☐ Pest control schedule signed off
- ☐ LPG installation signed off (if applicable)
- ☐ Endorsement from CLO / Pacific leaders

Unless anything changes - submit when renewing RSE status.

Declaration that this accommodation plan is true and correct and suitable for workers from x sending countries

NAME:	
SIGNATURE:	
DATE:	
PHONE:	