

SUBMISSION BY



to

THE DEPARTMENT OF INTERNAL AFFAIRS

on

**THE DIGITAL IDENTITY SERVICES TRUST FRAMEWORK
PHASE 2 REGULATIONS**

1 September 2025

CONTACT:

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INTRODUCTION

NZTech thanks the Department of Internal Affairs for the opportunity to contribute to its consultation on the Digital Identity Services Trust Framework (DISTF) Phase 2 Regulations. Our brief submission is made in support of more detailed submissions from members of NZTech who are deeply involved in this area, including the AI Forum of New Zealand.

ABOUT NZTECH

NZTech is a member-funded, not-for-profit organisation representing more than 2,500 members who together employ 10 percent of the New Zealand workforce, comprising startups, local tech firms, multinationals, education providers, financial institutions, major corporations, network providers, hi-tech manufacturers, and government agencies that work closely with the tech ecosystem.

The tech sector is a significant and growing part of the New Zealand economy, employing 121,000 people and contributing around \$22b in GDP. It is also one of the fastest-growing export sectors – New Zealand’s 3rd largest – with export receipts of \$10.7b in 2023. Software exports, for example, are growing at more than 20% p.a.

We note that “tech” includes physically manufactured products with a significant digital/knowledge-intensive component (e.g. Rakon, Tait Communications, F&P Healthcare), as well as weightless “digital” exports such as software, AI or gaming (e.g. Datacom, Xero, Orion Health, RocketWerkz).

KEY COMMENTS ON THE PROPOSED REGULATIONS

1. ACCREDITATION RENEWAL

We support the proposed option of a standardised renewal pathway, welcoming the certainty of this approach. It ensures consistency across providers, gives the sector clarity on expectations, and maintains fairness in application. At the same time we believe it should be complemented by proportionality measures for smaller providers and by mechanisms for interim oversight between renewal periods.

2. LEVELS OF ASSURANCE

We support the inclusion of levels of assurance in the regulations, and the Department’s preference for five levels. We recommend that these be reviewed periodically, for example every three years, to ensure they remain aligned with technological developments and international frameworks, thereby ensuring that New Zealand’s framework remains relevant and globally interoperable.

3. AMENDING REPORTING DATES

We support the proposal to move reporting dates to March and September. This will reduce the administrative burden on providers by avoiding the peak periods of the calendar year and the government's financial year-end, making compliance easier.

CONCLUSION

The review underway provides welcome opportunities for New Zealand to align the Trust Framework with global practice. This will ensure the framework remains relevant, resilient, and interoperable with partner economies, while also reinforcing New Zealand's leadership in responsible AI and digital identity governance.

NZTech thanks the Department for the opportunity to make this submission.

We would be happy to help further in any way we can on this important issue for New Zealand's tech community.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Graeme Muller', with a stylized flourish at the end.

Graeme Muller
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