SUBMISSION BY

to

MINISTRY FOR THE ENVIRONMENT

on

PROPOSED PROVISIONS – AMENDMENTS TO THE RESOURCE MANAGEMENT (NATIONAL ENVIRONMENTAL STANDARDS FOR TELECOMMUNICATION FACILITIES) REGULATIONS 2016

25 July 2025

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INTRODUCTION

NZTech thanks the Ministry for the Environment for the opportunity to submit on its proposed provisions contained in the Package 1: Infrastructure and development discussion document.

Our brief submission is made in support of our members, some of whom have particular interest in this work and may be making their own, more detailed submissions. We also support the views of the New Zealand Telecommunications Forum on the changes sought.

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).

COMMENTS

NZTech supports in general the proposed updates to the National Environmental Standards for Telecommunication Facilities (NESTF). These updates will enable the telecommunications sector to make network upgrades and resilience improvements, helping to ensure the New Zealand tech sector (and the customers and communities it serves) has access to vital connectivity.

However, we believe some changes to the proposals are needed to enable telco infrastructure to keep up with changes in the built environment and technology standards. We understand the New Zealand Telecommunications Forum is submitting on these more detailed points.

One such issue we would like to highlight is pole height, which is especially important to ensuring businesses and communities can communicate. Changes in urban areas allowing

for taller buildings mean that telecommunications facilities need corresponding height increases to enable mobile signals to get through. This is also necessary to enable technology applications to be used when people are on the move.

CONCLUSION

NZTech thanks the Ministry for the opportunity to make this submission. Our guiding principle in this area is that as technology continues to evolve so must the infrastructure that supports it.

Please feel free to reach out to us if you would like any further information.

Yours sincerely,

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