Draft Infrastructure Plan Submission

New Zealand Infrastructure Commission

internetnz

Who we are and what we stand for

InternetNZ | Ipurangi Aotearoa manages the .nz domain name system. We ensure all domain names ending in .nz are available for people and businesses in Aotearoa New Zealand. As a purpose-driven community organisation, we invest back into the community through grants and collaborative partnerships. We also advocate for an accessible and safe Internet that benefits everyone in Aotearoa New Zealand.

As part of the technical community, we regularly submit to the Government on matters concerning the technical layer of the Internet. We are writing this short submission to the New Zealand Infrastructure Commission - Te Waihanga to ensure that critical digital infrastructure and access to that infrastructure, are adequately considered as part of the Draft National Infrastructure Plan (the Plan).

We strongly support the need to adequately plan for New Zealand's current and future infrastructure needs. We welcome this opportunity to submit on the Draft National Infrastructure Plan, as digital infrastructure is an enabler to building New Zealand's economic future.

Digital infrastructure is critical to New Zealand's future

Critical digital infrastructure can be defined as the digital systems, facilities and assets that are vital to the functioning of society and the economy[1], such as the Internet, domain name systems, software that supports the running of physical infrastructure, internet banking, and other IT that is enabler of a thriving and growing economy and core to participating in everyday life for many New Zealanders.

Our 2024 Internet Insights Report[2] found that 50% of New Zealanders spend 4 or more hours on the Internet each day, and 74% had some level of concern about being cut off from the Internet for a considerable period of time.

The Plan currently has a strong but narrow focus on physical infrastructure and misses the opportunity to consider New Zealand's future digital infrastructure needs, or how digital infrastructure might be a key enabler of other sectors outlined in the Plan. InternetNZ suggests Te Waihanga needs to address this gap with more detailed information in the next version of the Plan.

Prioritisation criteria should consider digital infrastructure and digital equity

The Plan rightly notes that infrastructure is about services. InternetNZ advocates for an Internet for everybody. When planning for physical infrastructure such as telecommunications, consideration must be given to the prioritisation criteria and whether any investment in infrastructure closes equity gaps such as the digital divide - for example, approximately 7% of households that do not have the ability

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[1] https://www.ibm.com/think/topics/critical-infrastructure
[2] https://internetnz.nz/new-zealands-internet-insights/new-zealands-internet-insights-2024/

to connect to the Internet[3], and 20% of households cannot afford an Internet connection to meet their basic needs[4].

Delivering infrastructure and services cannot be driven by commercial imperatives alone. There are a number of successful examples of where Government co-investment, such as the expansion of the fibre broadband network and rural connectivity infrastructure, highlight that these models have been effective in providing digital infrastructure for New Zealanders. We support the consideration of public-private partnerships as part of the proposed long-term investment approach.

Recommendations

InternetNZ recommends that the Plan:

1. **Include investment planning for digital infrastructure as a critical enabler:** Building for New Zealand's future needs to include digital infrastructure in the Plan and investment considerations because it underpins all sectors and our economy.

2. **Include prioritisation criteria that assesses equitable access and digital equity to ensure that all New Zealand's communities, regardless of location, have access to the benefits of digital infrastructure.** We agree using co-investment models will support infrastructure investment but we would like to see a priority consideration to be given to equitable and affordable access to the Internet and digital infrastructure.

Want more details? Get in touch.

We are available for further dialogue on critical digital infrastructure. Please contact us at policy@internetnz.net.nz.

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[3] Digital Equity Coalition Aotearoa https://www.digitalequity.nz/
[4] Affordable Connectivity Report, DECA