



6 March 2026

Ref: OIA-2025/26-0480

Tēnā koe [REDACTED],

Official Information Act request relating to protective security and ICT hardware suppliers

Thank you for your Official Information Act 1982 (the Act) request to the Department of the Prime Minister and Cabinet (DPMC). On 8 February 2026, you clarified your request to be for:

“... To clarify, my request is not for DPMC’s own operational procurement processes or supplier records.

I am seeking DPMC-held material in its central coordination / national security functions (including NSRG and any ODESC-related coordination channels) that discusses or references Protective Security Requirements (PSR) supply-chain expectations as they relate to ICT hardware procurement/suppliers across the State sector, for the period 1 January 2022 to present.

This includes, where held by DPMC:

- 1. Briefings, papers, minutes, or communications in NSRG/ODESC (or related coordination channels) that discuss PSR supply-chain expectations for ICT hardware procurement, including where ICT hardware retail suppliers/intermediaries are referenced (e.g., JB Hi-Fi, Noel Leeming, Harvey Norman).*
- 2. Any templates, guidance, implementation notes, or coordination material circulated within those channels about supply-chain security expectations for ICT hardware procurement (policy/coordination only; not operational intelligence).*
- 3. Any DPMC-held records that identify (as referenced in DPMC material) which agency is the functional lead/owner of PSR supply-chain requirements and any related assurance artefacts.*
- 4. Any policy-level, high-level guidance on whether and how PSR/PERSEC (personnel security) considerations are relevant to private-sector suppliers in ICT procurement contexts (e.g., applicability boundaries), where held, and any NZISM references where cited.*
- 5. Please include material held by DPMC even if it originated from another agency, where it is held in DPMC coordination files.*

Administrative handling

- I note that MBIE leads the Government Procurement Rules. If any part is more closely connected with MBIE (or another agency), please transfer that part under s14 and advise me, while still providing any DPMC-held information within scope.*
- If any items are publicly available, please rely on s18(d) with pinpoint citation (URL + document + section/page).*
- Please provide a document schedule for located/refused items and cite the specific provision for any refusal; where only parts are sensitive, release the remainder with deletions under s17.*
- If reasonably practicable, please provide search particulars (business units consulted, keywords used, and the date searches were run).*

- *I'm happy to accept a rolling release of non-contentious items. Preferred formats: PDF for documents; EML/MSG for emails where feasible.*
- *If this clarification falls within s15(1AA), please treat it as replacing the original and confirm the new due date; otherwise, please confirm the current due date."*

On 9 February 2026, we confirmed to you that, as per section 15(1AA) of the Act, the receipt date of your request as clarified by you was 8 February 2026.

We wrote to you on 19 February 2026 advising that we had identified a 2022 Cabinet paper that was relevant to your request. Your request as it related to this Cabinet paper had been transferred to the Ministry of Business, Innovation and Employment (MBIE).

We have identified two additional documents held by DPMC with information in scope of your request.

Please find attached a joint DPMC and MBIE briefing dated 14 April 2022 to the Prime Minister and other Ministers "*Managing national security risks in procurement - progress and next steps*". As noted on the document released to you, some information, including all the attachments, has been withheld under the following sections of the Act:

- section 6(a), to protect the security or defence of New Zealand or the international relations of the Government of New Zealand
- section 6(b), to protect the entrusting of information to the Government of New Zealand on a basis of confidence by confidence by the Government of any other country or any international organisation
- section 9(2)(f)(iv), to maintain the confidentiality of advice tendered by or to Ministers and officials
- section 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinion.

The only other document identified as being held by DPMC that is in scope of your request is some joint guidance from April 2024 that has been withheld in full under section 6(a) of the Act, to protect the security or defence of New Zealand or the international relations of the Government of New Zealand.

Where information has been withheld under section 9 of the Act, in making my decision, I have considered the public interest considerations in section 9(1) of the Act. No public interest has been identified that would be sufficient to outweigh the reasons for withholding that information.

You have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the Act.

This response will be published on the Department of the Prime Minister and Cabinet's website during our regular publication cycle. Typically, information is released monthly, or as otherwise determined. Your personal information including name and contact details will be removed for publication.

Nāku noa, nā

Marika Hughes

Marika Hughes
**Acting Deputy Chief Executive
 National Security and Resilience**



Briefing: Managing national security risks in procurement - progress and next steps

Date:	14 April 2022	Report No:	DPMC-2021/22-1839
		Security Level:	RESTRICTED UNCLASSIFIED
		Priority level	High

	Action sought	Deadline
Rt Hon Jacinda Ardern Prime Minister and Minister for National Security and Intelligence	Note the contents of this report.	N/A
Hon Stuart Nash Minister for Economic and Regional Development	Agree to seek Cabinet agreement to a range of recommendations to enhance Government's ability to manage public sector procurement risks.	2 May 2022
Hon Andrew Little Minister Responsible for the NZSIS and GCSB	Note that the recommendations in this paper would have implications for your agencies (NZSIS, GCSB and DIA(GCDO) and that DPMC and MBIE will work closely with your agencies in the development of any Cabinet paper.	N/A
Hon Dr David Clark Minister for the Digital Economy and Communications		N/A

Name	Position	Telephone
Laurence Pidcock	General Manager, New Zealand Government Procurement, MBIE	N/A
Richard Lee	Policy Manager, New Zealand Government Procurement, MBIE	N/A

s6(a)

Minister's Office

Status:

Signed

Withdrawn

Comment for agency

Attachments: Yes

Briefing

Managing national security risks in procurement - progress and next steps

To: Rt Hon Jacinda Ardern
Prime Minister and Minister for National Security and Intelligence (for noting)
Hon Stuart Nash
Minister for Economic and Regional Development (for action)
Hon Andrew Little
Minister Responsible for the NZSIS and the GCSB (for noting)
Hon Dr David Clark
Minister for the Digital Economy and Communications (for noting)

Date	14/04/2022	Security Level	RESTRICTED UNCLASSIFIED
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Purpose

1. In November 2021 as part of the foreign interference work programme, Cabinet agreed that the Department of the Prime Minister and Cabinet (DPMC; as the agency responsible for national security) and the Ministry of Business, Innovation and Employment (MBIE; as the agency responsible for government procurement policy) would report back to Cabinet by June 2022 on:
 - a) the national security risks posed by public and private sector procurement;
 - b) the adequacy of existing regulatory and policy frameworks in managing them; and
 - c) options to improve awareness of these risks and ensure that New Zealand has better tools to manage them, if necessary [ERS-21-MIN-0042 refers].
2. As the responsible Minister for Government procurement (Economic and Regional Development), this report updates you (Hon Stuart Nash) on our findings and seeks your agreement to recommendations to enhance New Zealand's ability to manage procurement risks for Cabinet's consideration in June 2022.
3. This report also informs relevant ministers where recommendations have implications for their portfolios
 - a) the Minister Responsible for the New Zealand Security Intelligence Service (NZSIS) and the Government Communications Security Bureau (GCSB) where recommendations would have implications for the NZSIS and GCSB; and
 - b) the Minister for the Digital Economy and Communications where recommendations would have implications for the Department of Internal Affairs (DIA; as functional lead for digital).
4. This briefing has been prepared in consultation with the NZSIS, the GCSB, DIA (including the Government Chief Digital Office) the Ministry of Transport, and the Ministry of Foreign Affairs and Trade (MFAT).

Executive Summary

Background and context

5. In November 2021, Cabinet tasked you, as the Minister for Economic and Regional Development [ERS-21-MIN-0042 refers], to report to Cabinet in June 2022 on:
 - a) the national security risks associated with procurement;
 - b) the adequacy of existing frameworks to manage those risks; and, if required
 - c) additional measures to enhance New Zealand's resilience.
6. Consistent with this, this report seeks your agreement to MBIE preparing a Cabinet paper, recommending changes to the public sector's approach to managing national security risks in public procurement.

Procurement creates risks of espionage and sabotage that undermine our security interests...

7. Procurement can pose significant risks to our national security. This is because the supply of goods and services can grant a foreign state access to, or control over, sensitive New Zealand assets (physical and digital), which can create opportunities for espionage (data theft), sabotage (disruption of services), or coercion (the threat of service disruption with the goal of extracting government concessions).
8. While all types of procurement can pose risks, and these risks can arise at both the point of contract origination (for example, because the supplier is pursuing strategic objectives) or over the contract's life (for example, because the supplier's ownership changes or new threats emerge), we consider that in general terms these risks are greatest:
 - a) when purchasing goods and services that grant significant access and/or control – particularly information and communications technology (ICT) and services like maintenance, security, and assurance/audit; and
 - b) where the procurement is being completed by government or critical national infrastructures (CNIs, such as electricity or telecommunications providers), recognising the importance of such entities to the smooth function of New Zealand's economy.
9. New Zealand has experienced these risks already, with many examples of government and private sector entities acquiring equipment manufactured by state-linked entities that pose risks.

s6(a)



s6(a)



15. Given that any intervention in procurement will increase the cost of, and complexity in administering contracts, we consider that the Government should initially focus its efforts on those sectors where the threat and risk is greatest s6(a)

16. s9(2)(f)(iv) we recommend that your report back to Cabinet focus on options to enhance the public sector's resilience. This also has the advantage of not requiring legislation, allowing us to move quickly and - given the size of the government's annual procurement spend - enhance standards across supply chains.

s6(a)



18. The options recommended are s6(a), s6(b) [redacted] designed to complement:
- a) broader changes to New Zealand’s procurement settings, including the strategic refresh [DEV-21-MIN-0224 refers] and changes to strengthen the Government Chief Digital Officer’s oversight over agencies’ digital investments; and
 - b) other policy and operational work to manage foreign interference and other national security risks across New Zealand’s economy and democracy.

s9(2)(g)(i) [redacted]

Next steps

20. Subject to and consistent with Ministers’ decisions, MBIE and DPMC will prepare a draft Cabinet paper for your feedback. This will then be finalised for lodgement with the goal that it be considered by Cabinet’s External Relations and Security Committee on 28 June 2022 and endorsed by Cabinet on 4 July 2022.

Recommendations

We recommend you:

1. **Note** that in November 2021, Cabinet asked (DPMC and MBIE to report back to Cabinet in June 2022 on the national security risks posed by procurement, the adequacy of existing tools to manage them, and options for improvement (if required) [ERS-21-MIN-0042 refers].
2. **Note** that, with respect to the private sector, the national security risks associated with procurement s6(a), s9(2)(f)(iv) [redacted]
3. **Note** that, with respect to the public sector, New Zealand’s existing policy settings are adequate to manage national security risks posed by procurement, s6(a) [redacted]
4. **Agree** to MBIE and DPMC preparing a Cabinet paper for your (the Minister of Economic and Regional Development) approval recommending measures to enhance the public sector’s resilience to procurement risks.

YES / NO

5. **Indicate** your agreement to the suite of complementary options in Table 1, below, to be included in the draft Cabinet paper.

Briefing: Managing national security risks in procurement - progress and next steps	DPMC-2021/22-1839
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s6(a), s9(2)(f)(iv)




6. **Note** that these options, if adopted, would have implications for the Department of Internal Affairs, New Zealand Security Intelligence Service and the Government Communications Security Bureau and that MBIE and DPMC will work closely with these agencies in the drafting of any Cabinet paper.
7. **Note** that New Zealand has international obligations relating to government procurement and that DPMC and the Ministry of Foreign Affairs and Trade will work closely as this work progresses to ensure that any risks under New Zealand's international trade obligations are avoided or mitigated to the greatest extent possible.
8. **Note** that these options are generally consistent with s6(a), s6(b)


9. **Indicate** whether you would like to meet with officials to discuss the recommendations in this paper.

YES / NO

10. **Refer** this report to the Minister of Foreign Affairs and Minister for Trade and Economic Growth, given their portfolio interests in the “Countering Foreign Interference” work programme.

YES / NO

 Laurence Pidcock General Manager New Zealand Government Procurement, Ministry of Business, Innovation and Employment
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Rt Hon Jacinda Ardern Prime Minister and Minister for National Security and Intelligence
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Hon Stuart Nash Minister for Economic and Regional Development
...../...../.....

Hon Andrew Little Minister Responsible for the NZSIS and GCSB
...../...../.....

Hon Dr David Clark Minister for the Digital Economy and Communications
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Background and context

Foreign interference poses significant risks to New Zealand's national security, but we have a significant programme of work underway to manage it

21. All states engage in foreign influence activity, seeking to shape perceptions and decision-making in other countries. Such activity becomes foreign interference when it is purposely misleading, deceptive, covert or clandestine. These types of behaviours are increasing globally. Activities in this category present a high level of risk to New Zealand, as these activities are designed to undermine our institutions, mislead decision makers, and circumvent norms of international engagement.
22. These risks are only expected to increase. Our intelligence agencies assess that the long-term trend is toward foreign states having greater capability and intent to conduct interference activities in New Zealand. This reflects our significant natural and economic resources, valuable international reputation and relationships, and the increased availability of tools and ease with which malicious activity can be undertaken digitally.
23. To manage these risks, in 2018 Cabinet commissioned the development of the Countering Foreign Interference Work Programme, which included measures to enhance our resilience across four streams: sensitive technology, critical infrastructure, economic coercion, and democracy [ERS-18-MIN-0022 refers]. In November 2021, Cabinet took stock of the work completed to date under the Work Programme and commissioned a range of additional measures to enhance New Zealand's resilience to foreign interference [ERS-21-MIN-0042 refers].
24. As part of its November 2021 decisions, MBIE and DPMC were directed to prepare a report back to Cabinet for the Minister of Economic and Regional Development on foreign interference risks associated with public and private sector procurement. Consistent with this tasking and to inform the Cabinet report back this briefing:
 - a) provides an overview of the national security risks posed by public and private sector procurement;
 - b) assess the adequacy of existing regulatory and policy frameworks in managing them;
 - c) recommends options for you to present to Cabinet that would improve awareness of these risks and enhance our ability to manage them; and
 - d) outlines the next steps required to deliver advice to Cabinet by June 2022.
25. This work is consistent with that being completed by s6(a), s6(b) reflecting the challenging and rapidly changing geostrategic environment, as well as increasing awareness of the challenges and risks posed by procurement.

s6(a), s6(b)

New Zealand's work to manage procurement risks should complement a range of other forthcoming changes to New Zealand's procurement system

27. New Zealand's government procurement system is undergoing a range of changes to position it for the future and, in refreshing its strategic priorities, aims to ensure that the procurement system delivers more value to New Zealand, is more responsive to government priorities (to

support a high wage, low carbon economy), and is fair and transparent [DEV-21-MIN-0224 refers].

28. The options put forward in this paper are designed to align with and leverage these changes, as well as broader work on cyber resilience, and further enhance the integrity of the procurement system. They will take advantage of steps to better integrate the e-procurement ecosystem, improve data and transparency of procurement activity, manage strategic and critical suppliers to government, lift procurement capability, and establish greater accountability to the centre as well as anticipating the future change from functional leadership to system leadership, which will empower the system leader to play a stronger role in coordinating procurement activity.
29. The options align to the work underway by DIA, on behalf of the Government Chief Digital Officer (GCDO), to strengthen the GCDO's mandate and oversight over agencies' digital investments and broader work to strengthen the powers and mandate of government functional leaders. This has the goal of increasing efficiencies in digital investments and deliver better outcomes (including cyber security outcomes).

Procurement can pose significant risks to New Zealand's national security and is very difficult to detect

Procurement can be used by foreign states to conduct espionage and sabotage...

30. Procurement can pose significant risks to New Zealand's national security because the supply of goods and services can grant a foreign state, or those acting on behalf of a foreign state, access to or control over sensitive New Zealand assets (physical and digital).
31. This is important because control of, and access to such entities creates opportunities for foreign states to cut across New Zealand's core interests to weaken our economy or security, or to advance their own national interests. Specifically, it creates risks of:
 - a) espionage (such as data or technology theft),
 - b) sabotage (the deliberate disruption of services), and/or
 - c) coercion (the threat of service disruption with the goal of extracting concessions from government or another entity).
32. Reflecting the fact that procurement risks arise from access to, and control of, important data and information intellectual property, and physical systems and infrastructure, the types of goods and services most likely to pose risks are:
 - a) information and communications technology (ICT) and other networked equipment, reflecting that such goods provide access to (and potentially control over) digital systems; and
 - b) services that provide access to digital or physical systems, including maintenance workers, security providers, information technology consultants and other contractors.
33. Finally, while foreign interference risks can manifest across any area of New Zealand society, the threat and risk associated with foreign interference

s6(a)

s6(a)

...can arise in any part of the supply chain and before and after contracts are signed...

34. Procurement risks most obviously arise through the purchase of goods and services from compromised suppliers that are pursuing strategic ends contrary to New Zealand's national interests. However, adding to the complexity of the problem to be managed, they do not only arise through such transactions or only at the point of a contract being signed. Instead, risks can also present themselves:

- a) through vulnerabilities in the suppliers' supply chain (that is, the entities that they purchase goods and services from). For example, an entity with digital systems that have been compromised by a foreign state through poor security practices, or using subcontractors that pose an 'insider threat'; and
- b) over time, as the intent of the supplier changes because, for example their ownership changes, or they become subject to new legal pressures in their home jurisdiction;³ or they simply do not maintain up to date security settings.

... foreign states rely on a veil of legitimacy to conceal their efforts to undermine our national security. This makes it harder to manage.

35. When interfering in New Zealand's economy or democracy, foreign states prefer to act in ways that are obfuscated or sufficiently deniable to avoid inviting a policy, diplomatic, or other response from the target state.

s6(b)

37. Presenting a greater challenge, some states have also invested through subsidies and other non-market practices to ensure that certain suppliers dominate important markets.

s6(a)

s6(a)

Released under the Official Information Act 1982

Released under the Official Information Act 1982

s6(a)



A package of measures will be required to enhance New Zealand’s ability to detect and mitigate national security risks posed by procurement

s6(a) *prioritise our efforts given resource constraints* s6(a)

50. Officials consider that government action is required to enhance the entire economy’s ability to recognise and manage procurement risks. However, this must be done in a targeted and staggered way prioritising reform in the most high-risk areas first, recognising that:

- a) any intervention is likely to increase the direct cost of, and complexity of administering, procurement (imposing potentially significant opportunity costs); and



51. Consequently, the government should initially focus its efforts on those sectors of society where the threat and risk associated with foreign interference is greatest s6(a)



52. s9(2)(f)(iv)

s6(a)

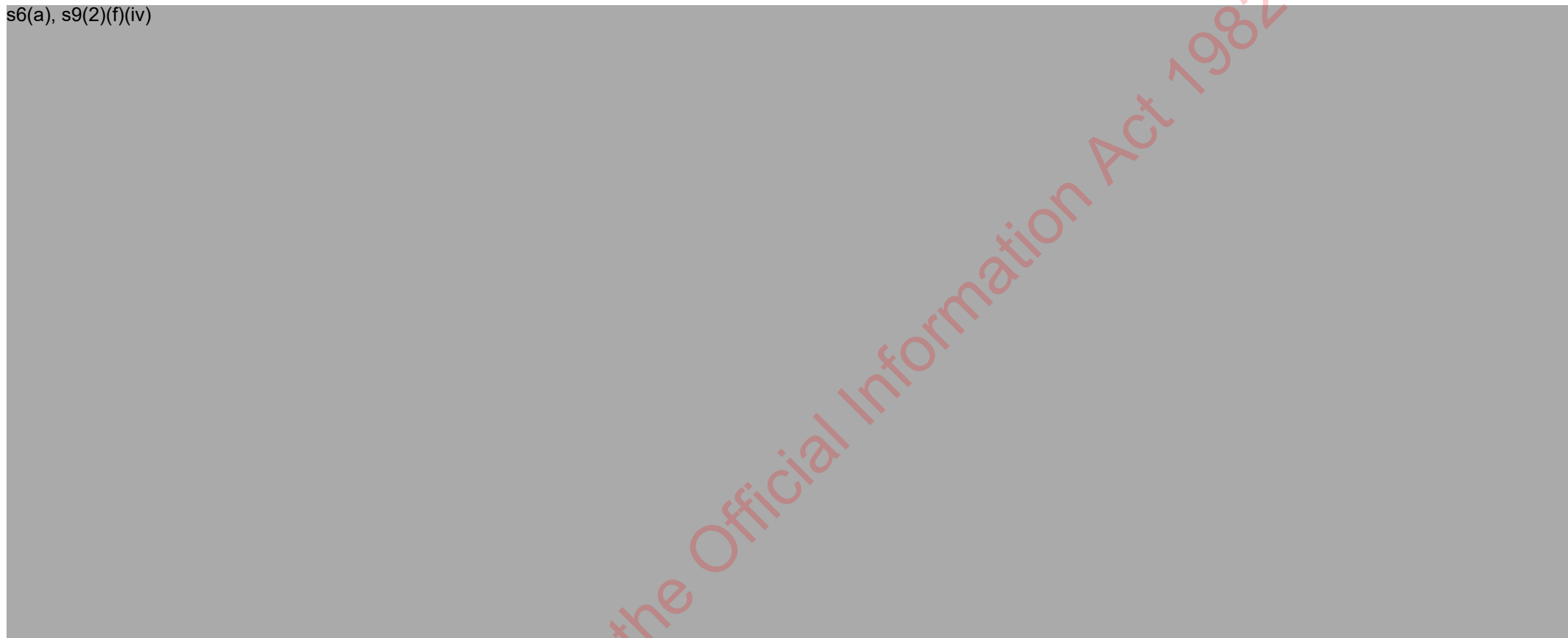


s6(a)



59. The recommended options for inclusion in your Cabinet Paper are summarised in Table 2 and supported by the NZSIS, GCSB, and DIA. An overview of options, considered but not recommended, is at Attachment D.
60. While we consider that these measures can be completed within the indicated timeframes, delivering them would nevertheless place pressure on responsible agencies, particularly national security agencies, that are implementing a growing number of government priorities while managing COVID and other business pressures. Adopting these measures will therefore limit agencies capacity to take on additional work that Cabinet may also consider a priority.
61. Given the constraints that New Zealand's international obligations can impose, it is critical that they be taken into consideration in the development and implementation of any tools. MFAT and DPMC will continue to engage on this work to ensure that any risks under New Zealand's international trade obligations are avoided or mitigated to the greatest extent possible.

s6(a), s9(2)(f)(iv)



Released under the Official Information Act 1982

Released under the Official Information Act 1982

Released under the Official Information Act 1982

Next steps

62. Subject to and consistent with Ministers' decisions, MBIE and DPMC will prepare a draft Cabinet paper for your feedback. This will then be finalised for lodgement with the goal that it be considered by Cabinet's External Relations and Security Committee (ERS) on 28 June 2022 and endorsed by Cabinet on 4 July 2022. The timetable below enables a report back by June 2022, as invited by Cabinet.

63. Table 3 provides an overview of key dates and milestones in the finalisation of these papers.

Table 3: Key dates and milestones to finalise advice to Cabinet

Milestone	Date
Feedback due from Ministers on this Report	2 May 2022
Prepare Draft Cabinet Paper and consultation with agencies	2 - 27 May
Provide you with draft Cabinet paper for consultation	30 May 2022
Ministerial consultation on Cabinet paper (<i>subject to any required changes</i>)	6-20 June 2022
Lodge Cabinet paper (<i>subject to any required changes</i>)	23 June 2022
ERS considers Cabinet paper	28 June 2022
Cabinet endorses recommendations to enhance the government's ability to manage procurement risks	4 July 2022

Summary of Attachments

s6(a)



[All the attachments to this briefing have been withheld in full under section 6(a)]