

Feedback on the Proposed Production Rebate 5% Uplift Points Test

Submitted to MBIE | 26 March 2026

Introduction

Spada, New Zealand's screen producer's guild, welcomes the opportunity to provide feedback on the proposed amendments to the New Zealand Screen Production Rebate - International 5% Uplift ('Uplift').

Spada represents New Zealand's film, television producers and production companies.

Spada's primary focus is the health and sustainability of the domestic screen sector. However, it recognises that a strong international production pipeline is integral to that goal. A thriving international sector and a thriving domestic sector should be mutually reinforcing, not competing, goals. Therefore, Spada is providing more general feedback on the proposed points test.

Spada notes that MBIE's proposed changes aim to (further) simplify the Uplift, to better align it with production realities, and respond to feedback from the sector. These changes also give effect to the lowered Qualifying New Zealand Production Expenditure eligibility threshold that took effect on 1 January 2026.

Spada supports changes to the Uplift that deliver:

- **Simplicity and predictability:** The stated goal of these changes is to simplify the Uplift and to better align it with production realities and industry feedback. The key will be in balancing these proposed changes while retaining the Uplift's potential to deliver back to the domestic industry.
- **Alignment with domestic sector goals:** The Uplift is a meaningful lever through which international productions can contribute to workforce development, cultural outcomes, and sector sustainability - these goals should be preserved in a way that does not compromise the predictability or simplicity of the Uplift.
- **Competitive attractiveness:** New Zealand must remain a globally competitive production destination. Ideally the Rebate should be lifted to a flat 25% - with a further 5% available through clear economic and cultural criteria. If that is not possible, then any changes to the Uplift must be straightforward, transparent, and workable, without risking the loss of productions to competitor jurisdictions.

Feedback on proposed changes/unintended consequences to proposed changes:

- **New Zealand Personnel: Section B:** Under the current B3 ATL category, Executive Producer, Associate Producer and Co-Producer credits receive the same weighting as roles with primary creative authorship.

In practice, these credits frequently involve less direct influence over the creative direction of a project than the Director, Producer, Writer or Showrunner. Spada believes this distinction should be reflected in the potential weighting of the roles. With the primary creative roles attracting a higher weighting.

- **Section C (Skills and Talent Development):** Currently, Section C carries relatively low point weightings. Given that workforce development is a primary pillar of the Government's screen strategy. Spada suggests reallocating the points from seminars (2) to further incentivise long-term career progression for New Zealanders in HOD or "shadowing" roles, internships and attachments.
- **Impact on domestic productions:** If the Uplift becomes significantly easier to access (which is partly the intention), there is a risk of increased competition for skilled New Zealand crew between international productions and domestic ones. Spada notes that workforce capacity constraints are a real issue and that any increase in international production activity should be accompanied by investment in our skills pipeline, ideally through mechanisms connected to the Uplift.
- **Reduced Sustainability visibility:** The removal of the Sustainability section as a mandatory gating criterion means sustainability planning will no longer be a universal feature of Uplift-qualifying productions. While Spada understands the rationale, it recommends that sustainability still be a feature of the Uplift and that MBIE look at alternative sustainability reporting requirements that could be retained elsewhere (e.g. as part of the final application) to preserve sector-level visibility of environmental practices.
- **Māori participation:** The removal of C3 (Māori crew criterion) and C10 (Lead cast or above-the-line crew is Māori) from the existing test is a significant change, and their removal reduces the extent to which the Uplift actively encourages Māori representation in international productions.

MBIE has cited low uptake, however, low uptake does not necessarily mean low value - it may reflect structural barriers to Māori participation in international productions that the criteria alone could not overcome.

Spada recommends MBIE explore whether a revised Māori participation criterion could be incorporated into the proposed test, including through engagement with Māori screen sector bodies.

The 5% Uplift within the wider rebate framework

Spada reiterates its position that the base rebate rate for international productions (currently 20%) is low by world standards. New Zealand's rate remains below the rates offered by comparable jurisdictions, including Australia, Canada, and the United Kingdom.

The 5% Uplift is a meaningful supplement, but the effectiveness of the points tests in attracting and retaining international productions is ultimately contingent on the base rate being competitive. Spada encourages MBIE to continue to monitor New Zealand's competitive positioning and to consider whether a review of the base rate may be warranted in the near term (taking it to 25%, with additional cultural and domestic criteria lifting the % to 30).

Spada thanks MBIE for the opportunity to provide feedback and looks forward to ongoing engagement on these important settings. We are available to discuss any aspect of this submission at MBIE's convenience.

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