DECEMBER 2025

NEW ZEALAND'S DIGITAL ASSETS STRATEGY

A Roadmap for New Zealand's Digital Assets Economy: 2025–2030

BLOCKCHAIN NZ

THE NZTech GROUP

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About BlockchainNZ

BlockchainNZ is the peak industry body and united voice for blockchain and digital assets in Aotearoa New Zealand, accelerating the growth, understanding, and adoption of emerging digital asset and blockchain technologies. We operate as part of the NZ Tech Alliance, which represents a cross-sector community of more than 800 organisations, covering nearly 10 percent of New Zealand's workforce.

Our role is to connect New Zealand's blockchain community with global networks and expertise, and to support industry development through collaboration, advocacy, and education. Through this work, we help strengthen New Zealand's position in the global digital asset economy while building a more resilient, innovative, and competitive tech sector at home.

About the Digital Asset Working Group

In September 2025, BlockchainNZ convened the Digital Asset Working Group in response to calls from industry, regulators and government for a more coordinated approach to digital asset policy. The Group brings together industry leaders, academics, legal experts, regulators and policymakers to develop a clear and practical framework for New Zealand's digital-asset future.

The Working Group operates as a cross-party, cross-sector forum that supports structured education, discussion and policy development and provides a trusted environment for informed, evidence-based decision-making. Its role is to ensure Parliament has access to independent, high-quality expertise as New Zealand defines its national position on blockchain and digital assets.

Within this structure, the Digital Assets Educational Working Group provides Parliament and the public with clear, accessible analysis to support informed decision-making and understanding.

This Group has prepared this roadmap to outline where New Zealand needs to head, and the key steps required to build a coherent, future-ready digital asset framework.

Foreword

Digital assets are no longer fringe; they are already being deployed across payments, finance, agriculture, supply chains and the creative industries

In New Zealand, nearly **NZ$8 billion** is traded annually, almost half of New Zealanders have owned or considered owning digital assets, and the global blockchain industry is forecast to grow from **USD 33 billion in 2025** to nearly **USD 393 billion by 2030**.

Yet **80 percent** of New Zealand activity occurs on offshore platforms, taking talent, capital and innovation with it. Without a clear national plan, New Zealand risks falling behind peers such as Singapore, Hong Kong, Australia and the UK, all of whom are moving quickly with dedicated strategies, licensing frameworks and national digital-asset agendas.

This roadmap reflects the views of BlockchainNZ's Digital Asset Working Group and outlines the steps needed to build strong foundations, enable sustainable growth, and position New Zealand to participate in, and with the right settings, lead the development of emerging cross-border standards.

The opportunities are significant: new export industries, productivity gains, higher-value jobs, improved financial infrastructure and better consumer outcomes. By 2030, digital assets will form part of the everyday economic infrastructure in New Zealand - supporting payments, trade, identity, verification and compliance - and **preparing for that future requires coordinated action now.**

Foreword by Trevor Topfer, Executive Director, BlockchainNZ

NZ $8B

Traded Annually

Digital asset trading in New Zealand already exceeds NZ$8B a year.

50% of NZ

Engaged with Digital Assets

Nearly half of New Zealanders have owned or considered owning digital assets.

10X

Growth by 2030

The blockchain industry is forecast to expand more than tenfold by 2030.

80%

Digital Asset Activity Leaving New Zealand

Most NZ digital-asset activity occurs on overseas platforms.

Introduction

New Zealand is entering a critical phase in the development of its digital-asset economy, as global adoption accelerates and regulatory approaches continue to evolve offshore. Establishing clear, coordinated priorities will be essential to supporting innovation while safeguarding consumers and maintaining international alignment.

Each chapter of this roadmap offers a structured analysis, explaining the concept, benchmarking global activity, assessing New Zealand's current stance, and articulating what a high-performing 2026–2030 landscape should look like, along with the actions required to achieve it.

The roadmap addresses the key domains that will determine New Zealand's digital-asset trajectory:

- Stablecoins and payments
- Classification of crypto assets
- Digital-asset custody
- Exchanges
- Debanking

Together, these chapters frame the considerations required to support a credible and well-governed digital-asset sector in New Zealand, positioning the country to build confidently, scale safely, and lead responsibly in the global digital-asset economy.

Use of terminology in this Roadmap

For the purposes of this Roadmap, digital asset is used as a broad, umbrella term encompassing cryptocurrencies, crypto assets, tokenised assets, and other blockchain-based instruments.

As terminology varies across jurisdictions and regulatory agencies, the Roadmap reflects the language used in different contexts, while using digital asset to refer collectively to the full spectrum of blockchain-based forms of value.

Executive Summary

This roadmap provides a coordinated plan for how New Zealand can develop a clear, safe and innovation-ready digital-asset framework by 2030. It brings together five core domains that shape the foundations of a modern digital-asset economy:

1. **Stablecoins and payments** - defining how fiat-referenced stablecoins fit within New Zealand's financial system and regulatory perimeter.
2. **Classification of crypto assets** - establishing coherent and consistent definitions across legislation and agencies.
3. **Digital-asset custody** - creating secure, regulated storage infrastructure to support institutional participation.
4. **Exchanges** - introducing clear expectations for licensing, AML/CFT obligations, asset segregation and consumer protection.
5. **Debanking** - addressing inconsistent access to banking services and providing clarity for risk-based assessments.

Together, these domains outline the regulatory and operational settings required to support responsible innovation, strengthen consumer protections, and ensure digital-asset activity remains within New Zealand's supervisory environment.

To guide implementation across these areas, the roadmap sets out a three-phase national plan:

Phase 1: Build Foundations (Next 6 Months)

Introduce legislation in the sequence set out in the roadmap and begin bringing forward the core regulatory frameworks. Early recommendations from the working group will guide this phase and give New Zealand the clarity seen in leading jurisdictions.

Phase 2: Scale (Next 3 Years)

Build out and operationalise the full stablecoin, custody, and exchange frameworks, expand sandbox environments, strengthen AML/CFT and consumer-protection settings, and support workforce and infrastructure development.

Phase 3: Lead (By 2030)

Have achieved global alignment, supported cross-border interoperability, and integrated digital-asset infrastructure into mainstream financial and economic systems. With a clear legislative base and coordinated policy settings, New Zealand can help shape emerging international standards rather than simply adapt to them.

This phased approach provides a practical and coordinated pathway for New Zealand to modernise its regulatory settings and position itself as a trusted participant in the global digital-asset economy.

Stablecoins & Payments

Stablecoins are digital representations of fiat currency that operate on a distributed ledger and aim to maintain stable value by referencing digital assets designed for that purpose.

Overview

There are two primary types of stablecoins:

1. **Asset-linked stablecoins** - stablecoins which are purportedly linked to financial or physical assets, which can be further broken down into the following sub-categories:
   a. Currency-referenced stablecoins.
   b. Commodity-linked stablecoins.
   c. Cryptoasset-collateralised stablecoins.

1. **Algorithmic stablecoins** - stablecoins that attempt to maintain their peg without collateral backing, and use a smart contract-based algorithm to adjust supply based on market demand.

The dominant and more accepted type is currency-referenced stablecoins, for which regulators globally are providing regulatory clarity on instituting a governance regime.

They function as money-like instruments that act as a store of value, a medium of exchange, and a unit of account, but they are blockchain-native, trade 24/7, and settle peer-to-peer within seconds.

Globally, regulators are either modifying their existing legislations or instituting a bespoke regulatory regime for currency-referenced stablecoins that exhibit characteristics of commitment to tokenholders to redeem one stablecoin for one unit of referenced currency, with an effective reserve-based stabilisation mechanism that includes high-quality and highly liquid assets, a regular attestation, and disclosure of the value and composition of the assets in the reserve backing the stablecoin.

Currency-referenced stablecoins, predominantly currency-referenced stablecoins, are now being adopted at scale by major companies for wholesale monetary flows, including Stripe, Visa, and Mastercard.

Retail use is emerging either through card-based access or, in more advanced markets, through QR code and paytech solutions.

Stablecoins & Payments

Global Regulatory Trends and New Zealand's Position

Dollar-referenced stablecoins are becoming an essential part of global payments infrastructure, and regulatory clarity and consistency in the treatment of domestically issued currency-referenced stablecoins and overseas-issued currency-backed stablecoins is now a priority across jurisdictions.

Definitions matter, as the classification of stablecoins has direct second-order consequences.

If a stablecoin is defined as a financial product, intermediaries that offer currency-backed stablecoins may need to become licensed and transitional relief frameworks would likely be required.

New Zealand has yet to define how stablecoins will fit within its regulatory framework. Establishing definitions, redemption standards, reserve requirements, and issuer obligations will be essential to support innovation while protecting consumers and maintaining alignment with global practice.

Across leading jurisdictions, regulatory priorities include:

- **Legal and regulatory characteristics**, clarifying whether currency-referenced stablecoins would be treated as electronic money, crypto-assets, or financial products/securities, and, consequently, whether existing regulation would be modified or a bespoke regulatory regime would be established for currency-referenced stablecoins.
- **Redemption requirements** that ensure holders can always redeem 1:1 with the Issuer upon a valid redemption request.
- **Reserve-based stabilisation requirements**, ensuring reserve assets comprise high-quality and highly liquid assets that are segregated and custodied from assets of the issuer, with the marked-to-market value of reserve assets at least equivalent to the outstanding stablecoins in circulation.
- **Transparency and Assurance requirements**, including mandatory attestations, disclosures, and regular reporting.
- **AML/CFT obligations** for issuers and all other intermediaries that offer currency-referenced stablecoins are compliant with the relevant AML/CFT rules in the issuing jurisdiction.
- **Licensing requirements for issuers** provide legal certainty and supervisory oversight.
- **Clarification of claims and holder rights**, including treatment during insolvency and rules for distributing reserve assets.

Stablecoins & Payments

2030 Vision: What Success Looks Like

By 2030, New Zealand can support a secure, efficient, and globally aligned stablecoin ecosystem. Success would mean clear legislative definitions, recognised redemption rights, reserve and audit requirements consistent with trusted jurisdictions, licensed issuers operating under New Zealand supervision, and safe retail and wholesale use of stablecoins across payments and financial services.

Actions & Priorities: How to Get There

New Zealand should:

- Develop a clear legal definition of stablecoins and clarify the scope of issuance-related financial services, taking into account their functional similarity to existing regulated financial products and services.
- Establish a tailored licensing framework for currency-referenced stablecoin issuance services, rather than uplifting existing financial-service licensing regimes, to account for operational requirements not adequately addressed under current frameworks.
- Implement enforceable 1:1 redemption rights and transparent, publicly available redemption policies.
- Require reserve assets to comprise high-quality and highly liquid assets that have a marked-to-market value that equals or exceeds the outstanding currency-referenced stablecoins in circulation.
- Mandate regular audits, attestations, and disclosure requirements for issuers.
- Apply AML/CFT obligations on the currency-referenced issuer and intermediaries that are consistent with local requirements.
- Adopt a reasonable requirement on overseas jurisdictional issued stablecoins offered locally that encourages regulatory visibility and oversight, with consumer protection as a focal point.
- Introduce licensing and supervisory frameworks for issuers, including rules on claims, insolvency, and reserve distribution.

These steps allow New Zealand to build a robust regulatory framework for stablecoins, enabling payments innovation while maintaining financial stability and consumer protection.

Classification of Digital Assets

New Zealand's current regulatory settings treat virtual assets through multiple overlapping lenses rather than a single unified definition, creating a complex and inconsistent perimeter for industry to navigate.

Overview

New Zealand does not have a single, unified statutory definition of "virtual assets." Instead, classification depends on which regulatory touchpoint is applied.

Property law treats tokens as property capable of trust analysis, the Financial Markets Conduct Act 2013 (FMCA) regulates tokens only if their features map onto an existing financial product category, and the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act) captures virtual asset service providers based on activity, using a definition that does not align with FATF or even with DIA's own guidance.

Because these frameworks operate in parallel rather than through a single coherent lens, the regulatory perimeter is inconsistent and difficult for industry to navigate.

Slight changes in a token's rights, features, or marketing can shift the classification outcome across property law, financial markets law, and AML/CFT obligations.

This increases uncertainty for issuers, exchanges, custodians, and developers, and makes it harder for local and international firms to understand whether their activities fall inside or outside New Zealand's regulated perimeter.

A clear classification framework matters because it determines whether tokens are treated as property, financial products, or in-scope virtual asset services. These outcomes shape investor protection, trust structures, insolvency treatment, licensing requirements, and anti-money laundering obligations.

Without clarity, New Zealand risks inconsistent supervision, higher compliance costs, and reduced competitiveness.

Classification of Digital Assets

New Zealand's Current Position

Property law: virtual assets as property and trust assets

The High Court's decision in *Ruscoe v Cryptopia Ltd (in liq)* confirmed that cryptocurrencies are "property" under New Zealand law. The Court held that blockchain tokens satisfy the composite definition of property—being definable, identifiable by third parties, capable of assumption by third parties, and having some degree of permanence or stability. It also found that Cryptopia held customer tokens on multiple asset-specific trusts.

This means virtual assets can be subject to proprietary rights, security interests, and tracing claims. Custodial and exchange arrangements may create trust relationships that carry fiduciary duties and govern shortfall allocation on insolvency. Personal property remedies such as conversion (where applicable), constructive trusts, and equitable proprietary claims may be available. As a result, virtual assets support full proprietary analysis rather than being treated as mere contractual expectations.

FMCA: classification by financial product characteristics

The FMCA does not regulate "virtual assets" directly. Tokens fall within the FMCA only if their rights and features fit a statutory category—debt security, equity security, managed investment product (MIP), or derivative.

In practice:

Tokens with profit rights, revenue shares, or pooled-investment exposure may be MIPs.

- Tokenised interests mirroring shares or debt instruments may be equity or debt securities (noting debt requires fiat payment).
- Tokens whose value or payoff depends on an external reference asset or event may be derivatives.
- Pure utility tokens generally fall outside FMCA financial-product rules, though entities may still require licensing if they operate a market, provide custody, or manage portfolios including crypto.

The FMA applies a substance-over-form approach, requiring issuers to assess token features, offer structures, marketing, and economic reality. Even if a token is not a financial product, a business may still require licensing or registration when providing a regulated financial service.

Classification of Digital Assets

New Zealand's Current Position

AML/CFT Act: activity-based capture of virtual asset services

The DIA supervises most virtual asset service providers for AML/CFT purposes. The statutory definition of "virtual asset" in the Definitions Regulations 2011 is aligned with, but wider than, FATF: a digital representation of value that can be digitally traded or transferred, or used for payment or investment purposes.

The definition excludes:

- FMCA-regulated financial products
- digital representations of fiat currency regulated as e-money
- closed-loop stored value or in-game items not transferable to third parties
- NFTs whose functionality does not amount to transferable value or investment

DIA's 2019 guidance provides a narrower definition again, creating a further point of inconsistency.

DIA treats the following activities as VASP services when carried out as a business for another person:

- exchange between virtual assets and fiat
- exchange between virtual assets
- transfer of virtual assets
- safekeeping or administration of virtual assets (including custodial wallets)
- participation in or provision of financial services for an issuer's offer or sale of a virtual asset

These businesses are generally "reporting entities" under the AML/CFT Act and, when providing a financial service, must be registered on the Financial Service Providers Register. Activities such as publishing non-custodial wallet software or providing technical infrastructure without moving value are typically out of scope.

Classification of Digital Assets

2030 Vision: What Success Looks Like

By 2030, New Zealand can operate a clear, coherent, and technology-neutral classification framework for virtual assets. Property law provides certainty for custody and insolvency outcomes. FMCA classification applies predictably to tokens whose economic features resemble traditional financial products. AML/CFT capture aligns with the FMCA, FATF standards, and definitions in Regulations and DIA guidance are consistent.

We recommend inserting a consistent "virtual asset" definition in both the FMCA and AML/CFT Act. In the FMCA, where virtual assets are not already captured as financial products, consideration should be given to a new class or classes of financial product or financial advice product which provides for financial advice, client money/property service, primary and secondary market rules to apply to such virtual assets where it makes sense to do so. For example, licensing of certain centralised exchanges as regulated markets should be explored along, with fit-for-purpose disclosure requirements for offers of certain virtual assets to retail investors.

Regulators take a coordinated functional approach across agencies, and the classification perimeter reflects actual uses and economic substance rather than labels. The system gives issuers, platforms, custodians, and investors a predictable environment, strengthens market integrity, and positions New Zealand alongside trusted global jurisdictions.

Actions & Priorities: How to Get There

To achieve this, New Zealand should:

- Harmonise definitions of "virtual asset" across the FMCA, AML/CFT Regulations, DIA guidance, and FATF standards.
- Provide updated FMA guidance clarifying how token features map onto existing FMCA financial-product categories.
- Strengthen coordination between FMA, DIA, MBIE, Treasury, and RBNZ to support a coherent classification perimeter.
- Clarify property-law treatment of custodial arrangements, trust structures, and insolvency outcomes.
- Review the scope of VASP obligations to ensure proportionality while maintaining strong AML/CFT safeguards.

By aligning definitions and integrating regulatory touchpoints, New Zealand can deliver a predictable, innovation-supporting classification framework that protects consumers, reduces regulatory friction, and supports global interoperability.

Digital Asset Custody

Digital asset custody is the foundational layer of a secure and credible digital asset ecosystem, yet New Zealand lacks a dedicated regulatory framework to support it.

Overview

Digital asset custody refers to the secure storage and management of digital assets such as cryptocurrencies and tokenised securities on behalf of individuals and institutions. Licensed custodians ensure these assets are protected from cyber threats, operational failures, and legal uncertainty.

For New Zealand, custody is the backbone of digital asset infrastructure. Without regulated custody, institutions cannot safely hold or trade digital assets. A clear framework provides investor protection through secure, compliant storage, strengthens market credibility to attract institutional players, supports innovation among fintechs and asset managers, and aligns New Zealand with trusted global jurisdictions.

Without licensed custodians, New Zealand risks falling behind the rapidly evolving digital financial landscape.

Global Regulatory Trends and New Zealand's Position

Around the world, jurisdictions are rapidly advancing digital asset custody regulation.

- **Singapore** leads in Asia through its Payment Services Act, which licenses custodians and enforces strong AML/KYC standards.
- **Switzerland**, through FINMA, has created a mature regulatory environment where licensed custodians like SEBA Bank and Sygnum operate under banking and securities laws.
- **The European Union's** comprehensive MiCA framework introduces specific provisions for digital asset custodians across member states.
- In the **United States**, 2025 marks a major regulatory shift, with initiatives such as the proposed CLARITY Act and interagency work to define custody standards and licensing pathways for digital asset service providers.

Australia is advancing ahead of New Zealand. In October 2025, the Treasury released the Treasury Laws Amendment (Regulating Digital Asset and Tokenised Custody Platforms) Bill, bringing custody into the Australian Financial Services Licence (AFSL) regime. It defines custody obligations for platforms, clarifies how financial services law applies to tokenised assets, and provides transitional support and updated ASIC guidance, enabling firms to innovate while preparing for full compliance.

New Zealand, by contrast, remains in an exploratory phase. While the FMA has issued guidance on crypto assets, there is no dedicated licensing regime for digital asset custodians. **This regulatory gap limits local innovation and deters international firms from establishing operations here.**

Digital Asset Custody

2030 Vision: What Success Looks Like

By 2030, New Zealand can position itself as a trusted digital asset hub in the Asia–Pacific region.

Success would mean licensed custodians operating under FMA oversight, custody integrated into mainstream finance to support tokenised assets and programmable money, interoperability with jurisdictions such as Singapore and the EU, and a thriving ecosystem of fintechs, custodians, and institutional investors.

This would be consistent with the FMA's own call for licensing of custody services for existing financial products (e.g. shares). This should happen at the same time, to ensure a level playing field.

This positions New Zealand as a leader in secure digital finance.

Actions & Priorities: How to Get There

To achieve this, New Zealand should:

- Establish a licensing regime for digital asset custodians, with clear standards for capital, governance, and cybersecurity.
- Engage with global regulators to align with frameworks like MiCA (EU), MAS (Singapore), and FINMA (Switzerland).
- Launch regulatory sandboxes and pilot programs to test custody models.
- Invest in talent and infrastructure to support compliance and innovation.
- Foster industry collaboration to co-design a framework that balances risk and opportunity.

By aligning with global leaders and acting decisively, New Zealand can build a secure, competitive digital asset custody framework that supports its financial future.

Exchanges & Market Infrastructure

Exchanges form the primary on- and off-ramps of the digital asset ecosystem, yet their regulatory treatment varies widely despite their critical role in facilitating conversion, custody, and compliance.

Overview

Exchanges, more accurately referred to as centralised exchanges, provide the core infrastructure for converting between fiat currency and digital assets. They enable four key functions: converting fiat into crypto, swapping one crypto asset for another, transferring crypto to end-user wallets, and converting crypto back into fiat.

Centralised exchanges operate through two major components:

1. **A trading system,** usually a ledger that tracks user balances and facilitates swaps and transactions.
2. **A custody solution,** which may be developed in-house or delivered through third-party software. Few jurisdictions currently mandate that exchanges must use a separate, independent custody provider.

Because exchanges function as the primary on- and off-ramps for the digital asset ecosystem, they shoulder significant compliance responsibilities. These include AML/CFT obligations, tax reporting, suspicious transaction reporting (STR), prescribed transaction reporting (PTR), scam and fraud management, and requirements under the travel rule.

There is a clear hierarchy in the exchange landscape. Large global or systemically important exchanges often operate without local licensing but serve as global liquidity sources for tier-two platforms. Regional licensed exchanges, by contrast, maintain local banking rails and are registered and supervised within their home jurisdiction.

Exchanges & Market Infrastructure

Global Regulatory Trends and New Zealand's Position

Globally, regulators are strengthening oversight of exchanges given their central role in market access, consumer protection, and financial integrity.

Common regulatory themes include:

- **AML/CFT obligations,** including Know Your Customer (KYC), Politically Exposed Persons (PEP) screening, transaction monitoring, and reporting of suspicious activity to local financial crime agencies.
- **Reporting and compliance**, such as tax reporting requirements under Crypto Asset Reporting Framework (CARF) and other regulatory information requests.
- **Consumer protections,** including transparency around fees, risks, and terms and conditions.
- **Technology and operational standards,** with some jurisdictions imposing cybersecurity, governance, audit, and custody requirements.
- **Asset segregation,** ensuring client funds remain separate from provider funds.
- **Audit and transparency,** including regular attestations, public disclosures, and independent reviews.
- **Listing and delisting procedures,** particularly where regulators distinguish between financial and non-financial products.
- **Licensing or registration requirements**, depending on how a regime classifies digital assets.
- **Dispute resolution** often requires registration with a financial disputes resolution service.

New Zealand has not yet established a dedicated licensing regime for centralised exchanges. Bringing exchanges under a clear regulatory framework would align New Zealand with global practice, support consumer protection, and provide clarity for both domestic operators and global platforms seeking to enter the market.

Exchanges & Market Infrastructure

2030 Vision: What Success Looks Like

By 2030, New Zealand can operate a secure and internationally aligned exchange environment. Success would include locally supervised exchanges with clear licensing and operational standards, with global exchanges operating under consistent obligations when servicing New Zealand users, strong AML/CFT compliance, segregated client assets, transparent fee and risk disclosures, and robust dispute resolution pathways.

Actions & Priorities: How to Get There

To achieve this, New Zealand should:

- Define the regulatory perimeter for centralised exchanges and clarify whether specific activities require licensing.
- Introduce AML/CFT, tax reporting, and travel rule obligations consistent with international practice.
- Mandate asset segregation, operational standards, and minimum cybersecurity requirements.
- Establish expectations for audit, attestation, and transparency reporting.
- Clarify listing and delisting obligations, including treatment of financial versus non-financial products.
- Require registration with a recognised financial disputes resolution service.

These steps would provide certainty for operators, protect consumers, and ensure New Zealand remains aligned with global regulatory developments.

Debanking & Access to Financial Services

Debanking has become a systemic barrier for digital asset firms, with banks often withdrawing services through blanket de-risking rather than genuine risk-based assessment.

Overview

Debanking refers to banks restricting or withdrawing essential services such as accounts, payments, and stable banking relationships. This disproportionately affects blockchain and digital asset firms, where uncertainty and heightened scrutiny often lead to blanket de-risking rather than genuine risk-based assessment, an issue documented by the Financial Stability Board and OECD.

Reliable banking access underpins core business functions including payroll, fiat settlement, treasury management, and compliance. When access is unpredictable, firms face operational disruption, higher costs, and barriers to scale. Research from the World Bank and IMF shows that excluding compliant firms from domestic banking reduces regulatory visibility and pushes activity into less transparent jurisdictions.

New Zealand's Finance and Expenditure Committee has acknowledged debanking as a widespread issue, echoing Australia's Senate inquiry, which found it limits competitiveness and forces businesses offshore. This undermines regulators' ability to understand emerging risks and constrains the growth of responsible digital asset activity.

Debanking also affects market structure. International reviews from the UK Treasury and EU MiCA process highlight that inconsistent banking access deters investment, slows tokenisation and digital payments innovation, and reduces national competitiveness.

With only a small number of banks servicing the sector, market concentration and systemic risk increase. The Australian Competition and Consumer Commission (ACCC) and the Bank of International Settlement (BIS) further note that incumbent institutions may be slow to support new digital finance models, unintentionally restricting competition and technological progress.

Clear, proportionate regulatory settings are essential to support objective, risk-based banking decisions. Predictable access to financial services strengthens investor and consumer confidence and keeps digital asset activity within New Zealand's regulatory perimeter supporting the country's ambition to build a credible, innovative digital finance ecosystem.

Debanking & Access to Financial Services

Global Regulatory Trends

Many global jurisdictions are adopting structured regulatory frameworks that provide banks with clarity when servicing digital asset firms. These frameworks enable financial institutions to manage risks appropriately while fostering innovation.

1. Singapore: Licensing Under the Payment Services Act

Singapore's Payment Services Act (PSA) establishes one of the most comprehensive frameworks for digital assets. It covers payment services, digital token exchanges, and custody, with clear AML/CFT and operational standards. This regulatory clarity has positioned Singapore as a leading digital asset hub and reduces the likelihood of arbitrary debanking.

2. European Union: MiCA's Harmonised Requirements

The EU's Markets in Crypto-Assets (MiCA) framework harmonises rules across all member states. MiCA defines licensing requirements for crypto-asset service providers, introduces governance and consumer protection standards, and sets rules for stablecoins. This clarity improves certainty for banks and encourages consistent risk-based engagement with the sector.

3. United Kingdom: Gradual Integration into Financial Services Law

The UK is progressively regulating digital assets through the Financial Conduct Authority (FCA), AML/CFT registration, and planned extensions of the Financial Services and Markets Act. This staged approach balances innovation with consumer protection and helps banks develop clearer expectations around servicing crypto businesses.

4. Australia: Regulatory Regime for Digital Asset Platforms

Australia is developing legislation for Digital Asset Platforms and Tokenised Custody Platforms. This framework aims to align digital asset platforms with existing financial services laws, clarify AML/CFT expectations, and provide banks with confidence to engage consistently with the sector.

Debanking & Access to Financial Services

New Zealand's Position

New Zealand has taken steps to recognise digital assets within existing frameworks, but its regulatory settings remain fragmented.

1. FMA Guidance and the AML/CFT Regime

The FMA has issued guidance on when crypto-assets may be considered financial products or services. Meanwhile, New Zealand's AML/CFT Act applies to exchanges and custody providers for obligations such as customer due diligence, suspicious transaction reporting, and record keeping.

However, these frameworks focus primarily on financial crime and market conduct, leaving gaps in areas such as prudential standards, governance, and sector-specific licensing.

2. Absence of a Dedicated Regulatory Framework

New Zealand lacks a cohesive, purpose-built framework for digital asset service providers.

This results in:

- Regulatory ambiguity regarding obligations and classification
- Inconsistent treatment from banks due to differing interpretations of risk
- Reduced investor and consumer confidence

3. Banks' Risk-Based Approach

Banks currently apply internal risk assessments to determine whether to service digital asset firms.

This has led to inconsistent outcomes:

- Some compliant businesses obtain accounts after demonstrating strong controls
- Others are declined or debanked due to low institutional risk appetite and unclear regulatory expectations

Banks have become de facto gatekeepers in the absence of clear regulatory settings. While risk management remains essential, inconsistent outcomes can hinder sector development and prevent responsible businesses from operating.

Debanking & Access to Financial Services

2030 Vision: What Success Looks Like

By 2030, New Zealand should have:

- Transparent banking expectations for digital asset firms and financial institutions
- A dedicated licensing or regulatory framework
- Alignment with trusted international standards
- A diversified financial ecosystem with multiple banks servicing the sector
- A balanced environment enabling innovation while maintaining AML/CFT, market integrity, and consumer protection

Actions & Priorities: How to Get There

- Develop a dedicated licensing or registration framework aligned with global digital asset standards.
- Publish clear regulatory expectations for banks when assessing digital asset firms.
- Provide sector-specific AML/CFT guidance to support consistent, risk-based assessments.
- Encourage more banks and payment providers to service the sector to reduce concentration risk.
- Communicate a clear regulatory roadmap to strengthen investor, business, and consumer confidence.

Strategy & Conclusion

This roadmap brings together New Zealand's core digital-asset priorities into a single, coordinated national plan.

Across the chapters - stablecoins and payments, classification of crypto assets, custody, exchanges, and debanking - the Working Group has outlined the concepts, global context, New Zealand's current position, a 2030 vision, and the actions needed to build a healthy, safe and innovation-ready digital-asset sector.

Taken together, these domains form the foundation of a modern digital-asset economy and provide a clear direction for policy, regulation and industry development.

To ensure progress, this roadmap proposes a staged approach.

Next 12 Months – Build Foundations:

Introduce legislation in the sequence set out in the roadmap and begin bringing forward the core regulatory frameworks. Early recommendations from the working group will guide this phase and give New Zealand the clarity seen in leading jurisdictions.

Next 3 Years – Scale:

Build out and operationalise the full stablecoin, custody, and exchange frameworks, expand sandbox environments, strengthen AML/CFT and consumer-protection settings, and support workforce and infrastructure development.

By 2030 – Lead:

Have achieved global alignment, supported cross-border interoperability, and integrated digital-asset infrastructure into mainstream financial and economic systems. With a clear legislative base and coordinated policy settings, New Zealand can help shape emerging international standards rather than simply adapt to them.

Based on the topics outlined in the roadmap, the Working Group is developing a set of legislative recommendations that draw from the strongest global examples. These will help give New Zealand the same clarity and confidence seen overseas and set the foundations for a healthy, compliant, and competitive digital-asset industry here at home. **You can expect to see the first of these early 2026.**

Strategy & Conclusion

A summary of the key deliverables across each domain is provided below:

Domain	Key Deliverables	Primary Agencies
Stablecoins & Payments	Definitions, reserve requirements, redemption rights, issuer licensing, treatment of overseas stablecoins	RBNZ, Treasury, FMA, MBIE
Classification of Crypto Assets	Clear asset classes, regulatory perimeter, treatment of financial vs non-financial tokens	MBIE, FMA, Treasury
Custody	Licensing regime, capital and cybersecurity standards, alignment with global leaders (MiCA, MAS, FINMA)	FMA, MBIE
Exchanges	Exchange licensing or registration, AML/CFT requirements, asset segregation, operational standards	FMA, DIA, MBIE
Debanking	Clear supervisory expectations, due-diligence standards, cross-agency guidance to support consistent bank treatment	RBNZ, DIA, FMA, MBIE

Ongoing progress will be coordinated by the Digital Asset Working Group, which will meet quarterly to track milestones, review developments, and adjust priorities as needed. We also propose that this group continue to serve as the central forum for cross-agency and industry coordination, ensuring emerging issues are identified early and that policy, regulation and implementation remain aligned.

This approach ensures that as global standards evolve, New Zealand stays competitive, future-ready, and able to capture the economic, productivity and innovation opportunities digital assets present.

This strategy positions New Zealand to build confidently, scale safely, and lead responsibly in the global digital-asset economy.

DECEMBER 2025

NEW ZEALAND'S DIGITAL ASSETS STRATEGY

New Zealand has a narrow but compelling window to shape its role in the global digital-asset economy. The foundations outlined in this roadmap provide a clear and coordinated path forward, grounded in international best practice and tailored to New Zealand's regulatory and economic landscape.

With clear direction, cross-agency alignment, and industry partnership, New Zealand can build a safe, competitive and innovation-ready environment that supports new industries, strengthens consumer protections, and prepares the country for the next generation of digital infrastructure.

This roadmap is the starting point. The opportunity is ours to capture.

Contact

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