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# INVISIBLE BORDER SECURITY: VULNERABILITIES AND RISKS TO NEW ZEALAND'S RESILIENCE

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In New Zealand, border security mechanisms depend on input from a wide range of agencies and are supported by national security strategic efforts. New Zealand's resilience in protecting itself from vulnerabilities and risks at the border requires an assurance that there are no gaps in these mechanisms. This article shows that there are in fact gaps in these mechanisms and highlights the invisibility of border security within the national security context. It points to a lack of awareness about how the extensive number of agencies involved contribute to border security. It reveals that governance of the complex border environment is currently beyond the bounds of possibility, and the alignment of strategic priorities for the large number of agencies with an interest in border outcomes is problematic. Furthermore, the collaboration between agencies requires more than formal arrangements. This article argues for the New Zealand Government to develop the concept of a Border Security Community—a concept that, if enacted, is likely to improve New Zealand's resilience in protecting itself from vulnerabilities and risks at the border.

## Introduction

In these times of global uncertainty from war, climate change effects, and the recent pandemic, states are increasingly focusing on border security as a resilience measure. Border security measures are broadly similar across the globe, but each country tailors its approach to meet its specific security needs. In New Zealand, border security endeavours are undertaken by a wide range of agencies and support several multi-agency national security strategic efforts.[1] Some agencies have operational responsibility for

border security, with a mandate for enforcement (for example, New Zealand Customs Service and Ministry for Primary Industries); others have an interest in policy and regulatory matters linked to border security (for example, the Department of Internal Affairs). However, border security is currently undefined, and the lack of definition across New Zealand's security strategies poses a challenge when considering it in the national security context.

This article utilises empirical research, including in-depth interviews conducted between June and August 2022, with seven employees from six agencies[2] and New Zealand's Border Executive Board, to address the question "How is border security understood in the New Zealand national security context, and what are the implications for the resilience of the border?" This article demonstrates there is a strong need, and therefore an opportunity, for further clarity on border security as a fundamental part of national security.

This article argues that the government does not consider the mechanisms[3] of border security in their entirety. This situation renders border security work invisible within the National Security System. It also suggests that there is a disconnect between agency functions and agencies' understanding of how they contribute to wider border security. Border security is managed through several other key priorities - a national security 'system of systems' - but does not exist as an entity in its own right; in this sense, in its current form, border security is everything and nothing. To remedy the situation, the article recommends using the new concept of the 'Border Security Community' to facilitate the adoption of a systems-thinking approach and to allow the extensive breadth of agencies to engage more productively.  Further, it supports future conversations to enable a better understanding of border security, thereby improving New Zealand's resilience from border vulnerabilities and risks.

Note that the use of the term 'border security community' is used in this article as a descriptive means to identify the collective of agencies identified by the author, who have a responsibility and/or interest in securing New Zealand's borders. It is not currently recognised as a structural entity that exists. The capitalisation of the term used in the Conclusion reflects the movement from descriptive means to a tangible designation.

## Background

In New Zealand, the border is managed by three main agencies with independent mandates overseen by different Ministers of the Crown. New Zealand Customs Service's (NZCS) primary role is to manage and secure the border from risks coming into or going out of New Zealand. Biosecurity New Zealand, a business unit of the Ministry for Primary Industries (MPI), focuses on stopping harmful pests and diseases entering New Zealand. Immigration New Zealand (INZ) focuses on immigration-related border control and is responsible for ensuring correct travel documentation is used for persons

crossing New Zealand's border.[4] While to varying extents all these agencies (including their previous iterations) have cooperated operationally and informally for decades, until 2007 there was no coordinating governance mechanism. Neither was there a forum for addressing the interests of agencies with peripheral or intermittent border responsibilities.

To remedy this situation, Cabinet agreed in 2007 to the establishment of a border sector governance structure for joint decision-making and guidance. The Border Sector Governance Group (BSGG) consisted of six core agencies[5] with the aim of providing an integrated and responsive border management system that best served New Zealand's interests by facilitating trade and travel while managing risk.[6] To that end, the first Border Sector Collaboration Strategy 2008-2013 (the Strategy) was created by the BSGG in 2008. In March 2010, a Border Sector Ministerial Group (the Ministers of NZCS, INZ and MPI) was established to provide leadership and direction for the Strategy. In 2012, the Border Sector Ministerial Group proposed a further programme of work for the following five years to improve passenger clearance experience and increase efficiencies in cargo clearance service delivery.[7] An audit by the Office of the Auditor General in 2017 recommended that the BSGG develop a long-term vision and strategy to 2030, as suggested by a 2016 review of the Integrated Targeting and Operations Centre;[8] however, there is no publicly available information on whether this was developed.

In January 2021, primarily as a response to COVID-19, a successor of the BSGG and the Border Sector Ministerial Group was created—the Border Executive Board[9] (BEB). This Board has joint responsibility for the performance of and accountability for New Zealand's border, and while set up to address COVID-19 border defences, it continues to operate.[10] The BEB was the first board to be established under the Public Service Act 2020, which provided a legislative framework for a new interagency model called the Interdepartmental Executive Board (IEB). This new model builds on the Cabinet-mandated Specific Purpose Board model (developed as part of the 2012 Better Public Services reforms) and is designed as a mechanism to bring together chief executives to address specific complex cross-cutting problems or priorities. The BEB is accountable for the end-to-end processes and future risk of the physical operation of the border; it is not responsible for the security and intelligence system, or the digital management of the border. Consequently, as a new 'single entity' to ensure a smarter, safer border, the BEB has a reasonably narrow function for the physical operation of the border and does not span agencies with an interest in but no functional responsibility for border security.

### Analysis: The governance of physical operations vs security & intelligence

The shape of the BEB is problematic for two key reasons. First, as explained in the Machinery of Government Guidance Note,[11] the criteria for an IEB model determine the narrow scope of the BEB. One of those criteria eliminates situations 'where the issue is

system-wide (there would be too many agencies involved)', suggesting that the model of the IEB does not support the range of agencies with a responsibility or interest in border security.  Second, structural considerations also limit its membership. For example, the New Zealand Defence Force (NZDF) and New Zealand Police (NZP) have substantial responsibilities relating to border security, yet both NZDF and NZP legislation stipulates they are independent in their decision-making from any Minister, and therefore could not be included in the BEB under the Minister for COVID-19 Response. A different example is the Civil Aviation Authority (CAA) – a Crown Entity that is governed by a Board appointed by and responsible to the Minister of Transport. Aviation Security reports to the CAA and has no direct relationship with any Minister.[12] Both these agencies have direct border responsibilities, and while AvSec was a member of the BSGG initially, it cannot be a member of the BEB.

Given the above limitations, an operational structure included in the BEB that seems to be able to bypass these structural limitations, the Integrated Targeting and Operations Centre (ITOC), raises questions about the use of the BEB.  ITOC is a multi-agency hub where staff coordinate national operations and identify and target risks to the border. ITOC was established by NZCS in 2011, and a programme of work influenced by the Border Sector Collaboration Strategy 2008-2013 looked at drawing in relevant agencies. Original partner agencies were MPI, New Zealand Security Intelligence Service (NZSIS), INZ and Maritime New Zealand (MNZ), with the later addition of NZP and AvSec. ITOC originally reported upwards to the NZCS Executive Leadership team, who only informed, not consulted with, border partner agencies.[13] At the time of the 2016 ITOC review, a multi-agency governance structure for ITOC had only recently been established.[14] After eleven years of operation, ITOC is now governed by the BEB. This raises a question about how the BEB can provide the appropriate governance over ITOC, considering NZP is a member of ITOC but not the BEB.

Analysis of interviews and agency documents suggest that border security in New Zealand operates in two distinct silos without any formal integrating mechanism or structural alignment: the **physical operation** with the BEB as an interdepartmental governing body as discussed above, and the **security and intelligence** aspect. The necessarily narrow focus of the BEB to fit within the IEB structure concerningly separates it from New Zealand's national security and intelligence functions and objectives. The **security and intelligence** aspect of border security is mandated by the Department of Prime Minister and Cabinet (DPMC), as New Zealand's lead agency for national security. DPMC is responsible for New Zealand's National Security System but does not override the statutory powers and responsibilities of Ministers of departments[15]. The National Security Board[16] (NSB) (previously known as the Security and Intelligence Board or SIB) is the governing body of the security and intelligence sector. NSB reports to the multi-agency Chief Executive committee, known as the Officials Committee for Domestic and External Security Coordination (ODESC), that manages the governance

and response to national security. The purpose of the NSB is "to build a high performing, cohesive and effective security and intelligence sector through appropriate governance, alignment and prioritisation of investment, policy and activity".[17] The NSB is also responsible for reporting on New Zealand's National Security and Intelligence Priorities (NSIPs). NSIPs are the Government's priorities for those agencies that provide intelligence, assessment, and other reporting on key national security issues. Of the 14 NSIPs, 'Maritime and border security' is specifically relevant to this article.[18] This NSIP supports Outcome 1 of the National Security Strategy "New Zealand protected from threats"[19]. Border security is therefore a fundamental part of national security. This structural separation raises an additional question about how the BEB can ensure there are no gaps in the operation of the physical border when the security and intelligence of border security are the responsibility of a different entity.

Despite clearly situating border security within national security, interviews suggest that the most significant challenge for security and intelligence agencies is a lack of accountability within the National Security System for border security. For example, there is no collective of agencies which coordinates activities to operationalise the maritime and border NSIP, and therefore no collective decision-making is evident. The interviews also highlighted that DPMC does not have the mandate to direct Ministers or individual agency Chief Executives to action; strongly suggesting the SIB (as it was at the time of the interviews) is not currently supported by a structure that enables collective decision-making, primarily existing as a voluntary model. This situation reveals a significant need for change to enable accountability and collective decision-making for border security outcomes. Perhaps the implementation of the National Security Strategy will address this issue in order to achieve Outcome 3 "An effective national security system".[20]

The Border Security Strategy, while documented in the National Security Strategy, does not yet exist, and neither is it likely to create the necessary connections with the National Security System when it materialises. There were expectations from interviewees that the new Border Security Strategy would provide an overarching direction and bring some cohesiveness to the broader border security community. However, one interviewee confirmed the new strategy will not look to drive direction across the border security community and will only be intended for the function of the BEB and the six member agencies involved (MPI, Ministry of Business, Innovation and Employment, Ministry of Foreign Affairs and Trade, Ministry of Health, Ministry of Transport, and the NZCS). Although this narrow focus aligns with the model of the BEB, the proposed strategy will do little to bridge the gap between the physical operation and the security and intelligence aspects of the border security community.

Threats relating to border security are addressed by issue-based national security strategies that intersect. There is not necessarily a difference between the border security NSIP and the 'Pacific resilience and security', 'malicious cyber activity', 'terrorism and

violent extremism', and 'transnational serious and organised crime' NSIPs. Border security plays a key role across multiple NSIPs, which are not designed to be read as individual priorities, but as an intertwining set of priorities. In the absence of a Border Security Strategy, the border security community is strategically driven by individual agency strategies and mandates, predominantly by the core border sector agencies. Analysis of several issue-based national security strategies[21] demonstrates a strong association with border security and alignment with a range of NSIPs.

*Figure 1* below shows these strategies, all of which have aspects of border security. *Figure 2* depicts references from within national security strategies that relate to border security and shows that they are connected to each other. Analysis of the strategies shows that the Transnational Organised Crime (TNOC) Strategy has a connection to all but one[22] of the others, as the strategies are issue-based and are commonly associated with transnational organised crime.
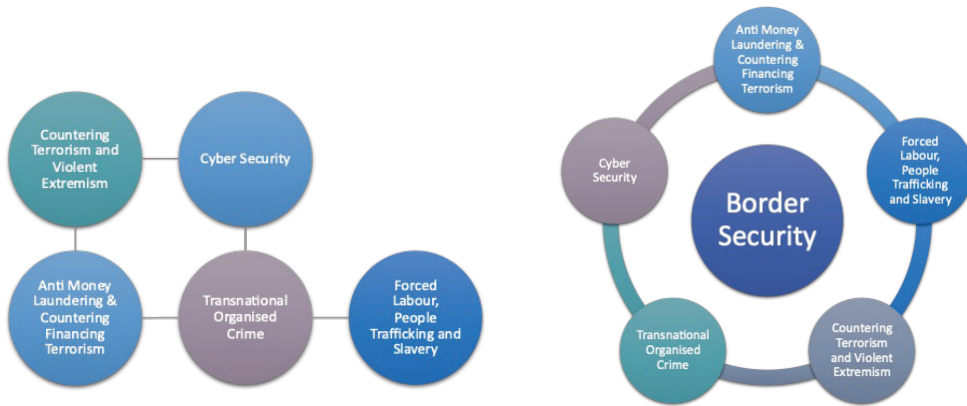


*Figure 1 (above left): National security strategy connections. Figure 2 (above right): Security strategies associated with border security. Source: the author.*

Inclusion of border security as a core national security issue within the National Security Strategy could be seen as contributing to multiple interpretations of the concept of border security. This analysis suggests that border security is not a national security issue in the same way as terrorism and transnational organised crime. Issue-specific national security strategies deal with problems or threats. Securing the border is a mechanism by which threats to New Zealand are prevented and managed through issue-specific strategies, as shown in *Figure 1*. A clearer way of describing border security is as a space where national security issues are addressed (an issue-space), rather than as an issue that is managed as a problem or a threat. As such, national security efforts render border security, as an issue-space, invisible.

Two lessons from international partners could provide some clarification. First, there are indications that New Zealand does not fully understand the issue-space of border security in the national security context. For example, the United Kingdom (UK), the United States (US) and Australia appear to recognise border security more broadly than New Zealand. The UK Counter-Terrorism Strategy (CONTEST) 2018 places strong expectations on the border as a mechanism to assist counter-terrorism,[23] as does Australia's National Counter-Terrorism Plan,[24] yet New Zealand's Countering Terrorism and Violent Extremism Strategy 2021 does not. The US Customs and Border Protection Strategy 2021 – 2026 includes 'Counter Terrorism' and 'Combat Transnational Crime' as enduring mission priorities, as well as the more traditional priorities of securing the border and facilitating lawful trade and travel.[25]

In comparison, New Zealand's National Security Strategy *Secure Together* outlines core national security issues such as terrorism and violent extremism and transnational organised crime yet does not outline the requirement of border security to assist with the prevention of these issue-specific threats. The Strategy refers to Border Security as a core national security issue[26] yet places it directly alongside the national security issue-specific threats, mirroring *Figure 1*. It is not given sufficient attention, as an issue-space as opposed to an issue-specific threat, which is unlikely to assist with the understanding of the concept of border security. The Strategy does not appear to define border security, and instead outlines that effective border security safeguards New Zealand and its people from threats. The UK and the US refer to border security as a requirement to support national security threats and thread it through issue-based strategies - an opportunity New Zealand could consider.

The Strategy does, however, recognise the border as extending to both physical and digital domains. This ostensibly reveals the presence of a growing concept of border security as a space beyond the physical border, including the virtual border. Nonetheless, as discussed earlier, the limited scope of the proposed Border Security Strategy does not appear to support this.

Second, the 2025 UK Border Strategy[27] shows how a plethora of interlinking strategies can become tangled and out-of-sync. The UK Border Strategy aims to embrace border innovation, simplify processes for traders and travellers and improve the security and biosecurity of the UK. It was built upon the UK's Maritime 2050 Strategy, which states that it is fully aligned with the 2010 National Security Strategy, the 2014 National Strategy for Maritime Security, and the 2015 Strategic Defence and Security Review;[28] however, all are already out-of-date, indicating that keeping interlinking strategies aligned is troublesome, and therefore not a reliable way to ensure strategies are implemented effectively. Given that border security as a component of national security is managed through a system of systems, demonstrated by *Figure 1* that shows the network

of strategies linked to border security, what we learn from this is that there is a real risk of a similar disconnect in New Zealand, should the New Zealand Border Security Strategy eventuate.

The problems outlined above demonstrate the effects of the limited definitions of border security. Looking at border security through a single agency lens does not allow for border security to be considered as the responsibility of the border security community as a collective. Twenty-five government agencies were identified by the author as having an operational responsibility (a mandate for enforcement) and/or a strategic interest (policy or regulatory links) in border security. Many interviewees acknowledged that responsibility for border security sits across a number of agencies, but they also revealed a lack of understanding on what border security is, as a mechanism. Indeed, agency definitions of what is considered 'border security' differed, reflecting the respective agency and its responsibility, which provides a fundamental, definitional problem about what each agency should prioritise.

Much of the disconnect between agency functions and the understanding of how they contribute to wider border security stems from the fact that there is no consistent international definition of border security. Willis *et al*.,[29] have a narrow definition of border security as controlling illegal flows of people or material across borders. However, Phelps *et al*.,[30] take a much broader view and discuss border security as traditionally concerning both the regulation of trade and the movement of people as well as the physical security of nations—a 'combination of all aspects associated with the control of territory for the good of a recognised population'.[31] There is however agreement that the border itself has extended beyond physical borders, in response to emerging technology enabling criminal activity, and therefore border security can come into effect at the point where the issue originates. As Binnendijk *et al*.,[32] discuss, the foreign point of origin needs to be considered as a critical line of defence in securing borders. Similarly, in a World Customs Organisation concept paper, Aniszewski[33] identifies risks to the border lie anywhere and need to be identified where they originate; therefore, the function and responsibility of border control extends well beyond the physical border.[34]

This growth of the border space beyond legislative limits involves cooperation and agreements with other countries and is grounded within national security. The issues stemming from technology ignoring state borders are complex and span the mandates of many agencies.[35] In addition to existing literature, it follows that securing the border is the responsibility of a considerably wider border security community than previously understood in New Zealand government circles. In a national security context, then, understanding the reach of the border sector community is not only instructive, but critical for ensuring appropriate connections are being made.

*Figure 3* below illustrates the connections between the twenty-five agencies (named in the horizontal and vertical axis), and marks where each agency has advised they have a relationship for the purposes of border security matters. The agencies are listed in order of the number of connections, from most (NZCS) to least (Reserve Bank of New Zealand). This matrix was developed by the author, primarily using the information received from Official Information Act 1982 (OIA) requests[36]. The requests specifically asked for a) '*a list of all agencies (public and private) with whom you either have a formal or informal partnership with (and state which) regarding border security matters*'; and b) '*a brief description (one sentence) of the purpose of that relationship*'.
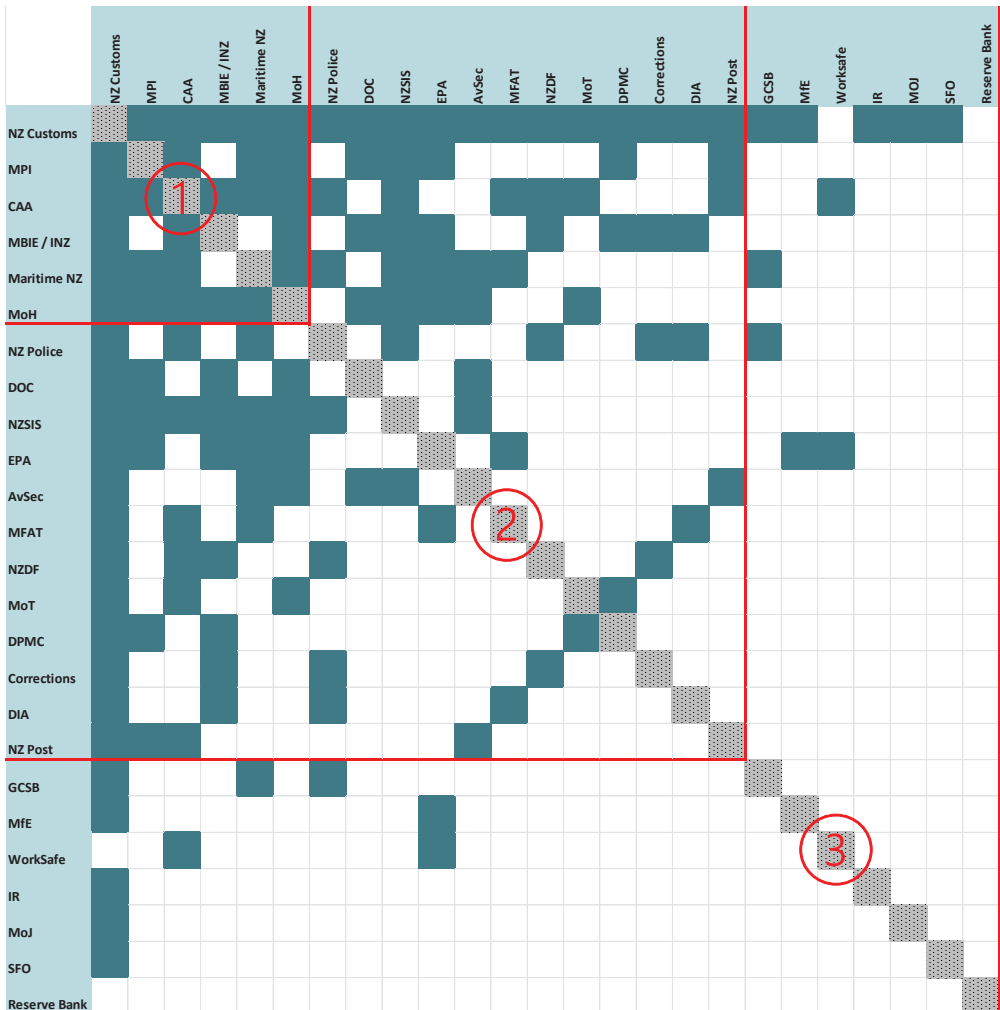


*Figure 3: Border Security Community relationship matrix. Source - author.*

Studying the connections between the border security community, the group of agencies with the highest number of identified inter-agency connections (Layer 1) primarily have operational responsibility at the physical border. Agencies with a fewer number of connections (Layer 2) are more operationally adjacent, with greater legislative functions. The agencies with the least number of connections (Layer 3) provide a mostly peripheral role as they have a limited function in relation to border security. The lack of connections across the agencies in Layer 3 suggests that these agencies have limited understanding of the part they play in securing the border. This could be due to their particular interest in the border security outcomes rather than their minimal mandate of responsibility.

What we see in government structures, though, is a gap between the role of agencies and their understanding of the layer they fit within, with potentially significant implications for national security. Given the roles NSB member agencies have at the border, it is reasonable to expect that these agencies would appear in Layer 1. However, five out of the nine NSB agencies appear in Layer 2. This suggests there are significant gaps between the security and intelligence agencies involved in border security. The lack of connections in Layer 3 is particularly interesting considering several of the agencies have significant border responsibility under issue-based national security strategies. For example, the Ministry of Justice, as the regulatory body for the Anti-Money Laundering / Countering Financing Terrorist Act (see *Figure 1*), did not mention the Reserve Bank, Financial Markets Authority, or the Department of Internal Affairs in their response to the OIA request. These three agencies have supervisory responsibility for the Act.[37] For these agencies not to recognise they play a role in border security highlights the misunderstanding with the mechanisms of border security and questions the amount of intelligence and data that might go undetected and unshared across these agencies.

*Figure 1* confirms the extensive number of agencies within the notional border security community and the potential interconnections to be managed. Agency responses suggested many agency-to-agency connection gaps exist and that in practice, a border security community does not exist. Agencies primarily have relationships with each other in line with their own agency mandates. The cross-hatching of agency mandates and multi-agency responsibility highlights the potential complexity of governing a border security community, should it exist in practice, where border security is managed through a system of systems. First, New Zealand's Cyber Security Strategy, the TNOC Strategy, New Zealand's Countering Terrorism and Violent Extremism Strategy and the New Zealand National Anti-Money Laundering and Countering Financing of Terrorism Strategy are all issue-specific national security strategies involving threats that typically intersect national borders. Second, border security concepts guide the mechanism that addresses national security threats and are supported by several multi-agency national security strategic efforts that target these specific border threats.

There are practical difficulties involved in managing intersecting agency mandates and responsibilities. Eppel *et al's* continuum spectrum[38] that describes and characterises relationships between agencies from informal coexistence through to formal collaboration helps provide an understanding of how collaboration is enabled across the border security community, and to what extent agencies believe they are working collaboratively. Eppel *et al's* spectrum describes the relationship characteristics of collaboration as a formal partnership with shared polices or practices, working together to achieve common goals. Analysis of the New Zealand border security context indicates that collaboration efforts within both security and intelligence, and physical border operations, face difficulties in information sharing, a lack of resources and disparate individual agency work plans. Given these challenges, it is expected that collaboration across the entire border security community is largely frustrated.  For example, interviews with INZ and NZCS implied that collaboration within ITOC is still only a perception, and in practice, bringing agencies together in one space to deliver collaborative, cohesive, integrated targeting capabilities is not the reality. None of the agencies interviewed considered themselves positioned in the 'collaboration' space, as described by Eppel *et al*.[39] Most interviewees admitted to being in the middle of the spectrum, between informal coexistence and formal collaboration. This example demonstrates that across the border security community, formal partnerships and agencies working together to common goals do not necessarily equate to collaboration in the way envisioned within the framework.

Instead, the interviews suggest that the relationship characteristics required for collaboration, as Eppel *et al*.[40] claim, are so far not present and are unlikely to ever be so. Collaboration requires more than a formal relationship, governance structures, resources, and a collective decision-maker. It involves a change in mindset towards a collective sector whereby agencies understand and accept synchronisation and synergy. Unfortunately, this will always be challenging to attain within the border security community given the priorities and responsibilities are multifarious. Indeed, this author's research suggests that collaboration across the border security community is currently beyond the bounds of possibility because the agencies involved have such diverse outcomes, and for the majority, border security is a narrow component of their own mandates.

This article demonstrates there are gaps in the understanding of border security as an issue-space and in the execution of border security mechanisms. There is a strong need, and therefore an opportunity for further clarity on border security policy, as a key contributor to national security. A framework similar to the TNOC approach may be beneficial to apply to border security. Governance arrangements for TNOC allow for a strategy and action plans agreed to by ministers and various working groups, which cover everything connected to TNOC, whether financial, social harm or community harm, not just national security TNOC activities.[41] This arrangement is broader than

the BEB, and without the limitations posed by an IEB model such as a single responsible minister. A framework that outlines the sectors, agencies, roles, and responsibilities of a border security community would assist in developing an ability to identify and address gaps across the entire border spectrum.

## Conclusion

Border security, as the responsibility of a collective border security community, is more comprehensive than many agencies seem to perceive. While this article highlights the existence of agencies' general awareness that they play a part in border security on an individual basis, contributions to border security, through the roles and responsibilities as a collective are not widely understood.

Issue-specific national security strategies obscure border security as an issue-space, and agency contributions to national security strategies are not fully recognised as contributions to border security. Meeting national security objectives relies on New Zealand being resilient to the vulnerabilities and risks at the border. This assurance assumes, therefore, that there are no gaps in border security mechanisms. This article demonstrates there is a strong need, and therefore an opportunity, to foster a comprehension of border security as an issue-space and to harmonise the efforts of the wider collective of agencies, to assist in the ability to identify gaps across the entire border spectrum.

The term 'border security community' was originally introduced as a way to identify a notional collective of agencies who have responsibility and/or interest in securing New Zealand's borders. This article demonstrates there is value in enacting the concept of a border security community into a tangible designation to support greater connectivity across agencies and to give greater specificity to the community border security as an issue-space in cross-cutting issue-specific strategies. A border security community must remain fluid in response to the security environment, which would make it difficult for it to be a structural entity. However, there could be significant value in developing a framework that outlines the sectors, agencies, roles and responsibilities of a Border Security Community, and articulating how the community operates in relation to border security as an issue-space. Border security is more than physical operation, and as such needs more effort from those agencies with an interest only. A border security community with a cohesive framework could drive the wider interest of the border as an issue-space, beyond the current governance structures.

Therefore, this article recommends that the NZ Government develops the designation of the Border Security Community, with NZCS as the lead agency due to its primary function of protecting New Zealand's borders. This would allow the extensive breadth of agencies to engage more productively in the system and enable a systems-thinking approach. The ability of agencies to secure the border could be strengthened with an increased understanding of the roles and responsibilities of a tangible Border Security

Community and provide an avenue for border security to have its own focus distinct from the security issues it is involved with. Additionally, this article recommends that border security is reframed as an issue-space, rather than being placed alongside core national security issues as if it were a threat. This would improve New Zealand's resilience to vulnerabilities and risks at the border.

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15    "New Zealand's national security system," 2020, Department of the Prime Minister and Cabinet. Available at https://dpmc.govt.nz/our-programmes/national-security-and-intelligence/national-security/new-zealands-national-security.

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22   Countering Terrorism and Violent Extremism

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35   A. Ladley and N. White, *Conceptualising the Border*, (Wellington, Institute of Policy Studies, 2006)

36   Responses to the OIA requests may depend on the knowledge and capability of the advisor who prepared the response and the staff member who signed it off. The effectiveness of internal agency processes that manage OIA requests may also play a part in the validity of the information provided.

37   "National Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Strategy," 9 December 2019, Ministry of Justice. Available at https://www.justice.govt.nz/assets/8487-Setting-the-Strategic-Direction-AMLCFT-Regime-locked.pdf

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