

19 May 2025

Policy Unit
National Emergency Management Agency
PO Box 5010, Wellington 6140
EmergencyManagementBill@nema.govt.nz

Tēnā koe

Re: Strengthening New Zealand's emergency management legislation

Thank you for the opportunity to provide feedback on the National Emergency Management Agency's (NEMA) consultation document on the review of the emergency management system.

Engineering New Zealand is the largest professional body for engineers in New Zealand. This submission reflects the views of Engineering New Zealand. Engineering New Zealand represents over 23,000 engineers, including engineers that support the emergency management sector.

Engineering New Zealand welcomes the Government's commitment to reform. We agree that the enabling legislation for New Zealand's emergency management sector needs to be updated, clarified and amended to support a high functioning system needed to manage our growing disaster risk. Recent events highlighted several lessons, including areas where the system did not respond in the way that is expected or required.

This covering letter outlines the areas of the consultation document that are of greatest importance to engineers. Attached to this letter is our completed submission form that provides responses on the questions and options provided in the consultation document.

Improving protections from civil liability for undertaking emergency management activity in good faith

Engineers play a crucial role in emergency response, most notably in providing rapid assessments on the safety of various structures after an event. These assessments help protect the public and support the continued delivery of critical infrastructure. It is important that engineers are enabled to do this efficiently and this expertise can be accessed quickly.

Engineering New Zealand welcomes the focus on improving protections from civil liability for undertaking emergency management activity in good faith. Engineers who undertake rapid assessments have to do so with limited time, resources and information available to them. They act on their best professional judgment. This means that the conclusion of these assessments can change in the future if structures are re-assessed. This can lead to challenges for the engineers involved.

Compensation for engineering professionals

We also welcome efforts to enable compensation for labour costs. It is important that professionals who are required to provide services immediately during an emergency can be compensated for their time and expertise. We support a requirement at both a national and local plan level to address the procurement of specialist professional services.

Clear roles and responsibilities

We consider that clarity of roles and responsibilities before, during and after an emergency is key. As the consultation document highlights, the current legislation does not always make these roles clear, which can lead to confusion and duplication. It is important that the legislation ensures the right people have the tools they need to plan for and respond to an emergency as efficiently as possible. A key aspect of this is clear processes and procedures to share information and communicate. This should also ensure that people have access to appropriate expertise (i.e.. engineers) when an emergency happens.

We support a whole-of-society approach to emergency management that draws on the expertise and resources of iwi, hapū, community groups, businesses, volunteers and others. Engineers often work alongside these groups in emergency response, and a system that better enables collaboration and values community led input is likely to deliver better outcomes. We see value in continuing to explore how the system can better support these kinds of partnerships in practice.

It is also important that the emergency management system is designed to enable the right people to take control, when necessary, to partner when appropriate, and to step aside when others are best placed to lead. Engineers understand the importance of this balance, particularly when working in complex, high stakes environments after a disaster. We support efforts to reflect this principle in future system settings.

National direction

We support the development of clear and robust national direction to lift the consistency and quality of emergency management across the country. In our view, national direction should set clear expectations for performance, regardless of where an event occurs. It will also support councils that may not have the capacity or capability to deliver a quality emergency management service on their own.

To be effective, this direction should be supported by practical guidance that clearly sets out what good practice looks like and how it can be achieved. This approach will support delivery and build confidence in the sector.

Engineering New Zealand would like to see a greater focus on emergency preparedness and activities to help support community preparedness. It is important to enable communities to practice responses, support response and recovery plans and develop enduring relationships. Some communities/regions already have robust processes and run comprehensive simulations to help ensure they are as prepared as possible. We would like to see a greater focus and expectation for this in national direction.

Alignment with other regulatory regimes

The design of buildings and infrastructure can greatly support efforts to reduce risk in an emergency. Engineering New Zealand continues to advocate for strong building and planning systems that support resilient infrastructure that reflects New Zealand's growing hazard risk. We would like to see NEMA play a stronger role in ensuring related systems also provide resilient infrastructure to support a robust risk management approach.

In particular, we would like to see better alignment and integration between the Emergency Management legislation and the Building Act. This must include ensuring better coordination between responsible agencies and processes, including the Rapid Building Assessment process and processes/plans provided in Emergency Management legislation.

We support the concept of a broadened definition of critical infrastructure and note that this aligns with the approach taken in other recent legislative reform processes (i.e.. Resource Management reform). We recommend that wherever possible definitions of critical or essential infrastructure are aligned to help reduce confusion and misinterpretation.

Conclusion

Thank you again for the opportunity to contribute towards strengthening New Zealand's emergency management legislation. Engineering New Zealand has access to engineers with significant experience working within the emergency management system and would be happy to facilitate a conversation to provide NEMA with more detailed technical advice and experiences. Please contact us if this would help support your policy development. We look forward to continuing to support this work as it progresses.

Nakū, na

A handwritten signature in blue ink, reading 'R. S. Templer'.

Dr Richard Templer
Chief Executive

Submitter information

Any information you provide will be stored securely.

Your name, email address, and organisation

Name:	Dr Richard Templer (Chief Executive)
Email address:	richard.templer@engineeringnz.org
Organisation: (if applicable)	Engineering New Zealand

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Use of information

Submissions will be used to inform NEMA's policy development process and will inform advice to Ministers. Your submission (including identifying information) may also be shared with other government agencies working on policies related to emergency management. NEMA may contact submitters directly if we need clarification on their submission or would like further information from them.

Consultation questions

These questions relate to the issues and options raised in the discussion document *Strengthening New Zealand's emergency management legislation*. You can find the full discussion document on [NEMA's website](#).

You do not need to answer all questions.

Objectives for reform

The Government's proposed objectives for reform are to:

- strengthen community and iwi Māori participation in emergency management
- provide for clear responsibilities and accountabilities at the national, regional, and local levels
- enable a higher minimum standard of emergency management
- minimise disruption to essential services
- ensure agencies have the right powers available when an emergency happens.

Refer to pages 8–9 of the discussion document to answer the question in this section.

1. Have we identified the right objectives for reform?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We are generally supportive of the proposed objectives for reform.

However, we consider that a few areas should be better reflected:

- Recovery needs to be more clearly addressed. Legislation should set clear direction for the recovery phase following an event.
- Communication infrastructure, which is critical during response and recovery, must also be prioritised under minimising disruption to essential services.
- Ensuring access to expert resources when an emergency happens is clearly reflected, this can be included in objective e.
- Continued development in hazardous locations, such as near the coast or on unstable slopes, remains a concern and should be addressed to strengthen resilience.
- Coordination and consistency with related regulatory regimes could be included. This would help ensure alignment between the Emergency Management legislation, Building Act and Resource Management Act) and reduce misinterpretation.

Objective 1: Strengthening community and iwi Māori participation

Issue 1: Meeting the diverse needs of people and communities

We have identified options to ensure the emergency management system better meets the diverse needs of communities, with a particular focus on those who may be disproportionately affected during an emergency.

Refer to pages 10–13 of the discussion document to answer the questions in this section.

2. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We agree with how the problem has been described and are supportive of efforts to plan for the needs of all communities and people, as this should help improve outcomes during emergencies.

In addition, we recommend greater focus on preparedness and readiness activities that make these plans effective in practice. This includes undertaking regular exercises, building relationships with partners, and developing joint response and recovery arrangements. These steps would help ensure that planning efforts are inclusive and result in a system that is ready to respond effectively when an emergency occurs.

3. Are there other reasons that may cause some people and groups to be disproportionately affected by emergencies?

Please explain your views.

Insert response

4. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We support option 3 “require CDEM Group plans to include how people and communities that may be disproportionately affected will be planned for”. It is our view that legislating this requirement would ensure a consistent approach across all Groups and provide clarity for councils and communities.

5. What would planning look like (at the local and national levels) if it was better informed by the needs of groups that may be disproportionately affected by emergencies?

Please explain your views.

Insert response

6. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 2: Strengthening and enabling iwi Māori participation in emergency management

We have identified options to recognise the contributions made by iwi Māori in emergency management, to the benefit of all people in New Zealand.

Refer to pages 13–16 of the discussion document to answer the questions in this section.

7. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We agree with how the problem has been described. We support the focus on iwi Māori and efforts to reflect mātauranga Māori in the emergency management system, efforts to recognise and enable iwi Māori contributions will benefit all communities across Aotearoa. We defer any recommendations to those best suited to comment.

8. Have we accurately captured the roles that iwi Māori play before, during and after emergencies?

☐ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

9. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

10. How should iwi Māori be recognised in the emergency management system?

Please explain your views.

Insert response

11. What should be the relationship between Civil Defence Emergency Management (CDEM) Groups and iwi Māori?

Please explain your views.

Insert response

12. What should be the relationship between Coordinating Executive Groups and iwi Māori?

Please explain your views.

Insert response

13. What would be the most effective way for iwi Māori experiences and mātauranga in emergency management to be provided to the Director?

Please explain your views.

Insert response

14. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 3: Strengthening and enabling community participation in emergency management

We have identified options to improve communities' ability to participate in emergency management. This includes making it easier for individuals, businesses, and other community organisations to offer resources to the "official" emergency response.

Refer to pages 16–18 of the discussion document to answer the questions in this section.

15. Do you agree with how we have described this problem?

☒ Yes

☐ No

☐ Not sure / no preference

Please explain your views.

Engineering New Zealand has, among other things, previously helped provide information on suitable engineers to assist in an emergency. However, the process is often unclear and inefficient. Clear processes that help communities provide information and access resources will enable a better response after an emergency.

We would like to see more formalised relationships/plans to procure specialist expertise (i.e.. engineering) before an emergency occurs. This would help enable rapid access to critical advice in an emergency.

16. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

17. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 4: Recognising that people, businesses and communities are often the first to respond in an emergency

We have identified options to address barriers that may stop people, businesses, and communities from acting during an emergency.

Refer to pages 18–19 of the discussion document to answer the questions in this section.

18. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We agree with the description. However, to provide further context, engineers can face distinct challenges when operating in the emergency management system. Engineers play a role in providing rapid assessments on the safety of various structures after an event, particularly after earthquakes. This assessment helps protect the public and supports the continued delivery of critical infrastructure. It is vital that engineers are enabled to do this efficiently. Engineers who undertake rapid assessments must do so with limited time, resources and information available to them. They act on their best professional judgment. Because of this, the outcome of these assessments can change in the future and engineers can face significant backlash.

19. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We are supportive of both legislative options (options 2 and 3).

Protection from civil liability

Protection from civil liability would help ensure that people (including engineers) can act quickly in emergency situations without fear of legal risk – this would improve the response phase overall. However, we have some concerns around how this would work in practice- particularly in relation to the overlap with Rapid Building Assessments (RBA) provided in section 390 of the Building Act.

It is important to ensure that people working under the direction/delegated authority of either the responsible person (BA) or controller (CDEMA) must be covered by this proposal. We would like to see all professionals who provide expert advice in an emergency or in preparation for one to be covered by this proposal.

We recommend that there is some form of safeguard around this proposal that ensures people who act quickly in emergency situations are properly qualified or competent to do so otherwise situations may arise where helpers endanger themselves or others (i.e. someone needing to demolish a building to ensure peoples safety is suitably skilled to do so). This could be some form of reasonable person test.

Compensation for labour costs

It is our view that enabling compensation for labour costs would formalise a process that is happening informally, where councils reimburse costs after the fact. Further, recognising labour as a public good while creating certainty around reimbursement would encourage faster action and support better outcomes. Current practice expects that RBA assessors volunteer their time. We would like to ensure that these assessors are fairly compensated for their work at a standardised/pre-agreed rate. As above, we would like to ensure that all experts who provide their services in an emergency context are able to access compensation.

Both options would give CDEM controllers more certainty, streamline decisions, and support faster emergency responses. It would also enable engineers to continue to provide this critical service.

We note that there is still a role for informal/un-coordinated assistance in some cases, particularly in support of life-saving efforts, it is important that the system is flexible enough to acknowledge and recognise these cases.

20. Are there any other options that should be considered?

Please explain your views.

Insert response

Other problems relating to this objective

21. Should we consider any other problems relating to community and iwi Māori participation?

Please explain your views.

Insert response

Objective 2: Providing for clear responsibilities and accountabilities at the national, regional, and local levels

Issue 5: Clearer direction and control during an emergency

We have identified options to make it clearer who is in charge of the operational response to an emergency.

Refer to pages 20–25 of the discussion document to answer the questions in this section.

22. Do you agree with how we have described this problem?

☒ Yes

☐ No

☐ Not sure / no preference

Please explain your views.

Engineering New Zealand supports having clear roles and responsibilities, particularly during and after an emergency. It is important that the public and those involved in the response understand who is responsible for direction and coordination functions.

It is important that the legislation ensures the right people have the tools they need to plan for and respond to an emergency as efficiently as possible. A key aspect of this is clear processes and procedures to share information and communicate. This should also ensure that people have access to appropriate expertise (i.e.. engineers) when an emergency happens.

We support a whole-of-society approach to emergency management that draws on the expertise and resources of iwi, hapū, community groups, businesses, volunteers and others. Engineers often work alongside these groups in emergency response, and a system that better enables collaboration and values community led input is likely to deliver better outcomes. We see value in continuing to explore how the system can better support these kinds of partnerships in practice. We see the importance of a very

strong relationship between NEMA and other agencies, especially MBIE for the RBA process.

It is also important that the emergency management system is designed to enable the right people to take control, when necessary, to partner when appropriate, and to step aside when others are best placed to lead. Engineers understand the importance of this balance, particularly when working in complex, high stakes environments after a disaster. We support efforts to reflect this principle in future system settings.

We defer detailed comments on where those responsibilities should sit or how they are structured to those with expertise in emergency management.

23. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

24. Are there any other options that should be considered?

Please explain your views.

Insert response

25. Do you think more fundamental changes are needed to the way direction and control works during the response to an emergency? If so, why?

☐ Yes ☐ No ☒ Not sure / no preference

Please explain your views.

Insert response

Issue 6: Strengthening the regional tier of emergency management

Issue 6.1: Resolving overlapping CDEM Group and local authority roles and responsibilities

We have identified options to ensure it is clear what CDEM Groups and each of their local authority members are responsible for.

Refer to pages 26–28 of the discussion document to answer the questions in this section.

26. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Please see response provided to issue 5.

27. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

28. Are there any other options that should be considered?

Please explain your views.

Insert response

29. Do you think more fundamental changes are needed to the way emergency management is delivered at the local government level (for example, the CDEM Group-based model)? If so, why?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We understand that there is duplication between the roles of Sector Coordinating Entities (SCE) and Lifelines Group, as noted in the WaterNZ submission. We encourage further work to clarify these roles and how they should best interact. It is important that there is not duplication or misalignment with various roles across the system.

Issue 6.2: Providing for clear and consistent organisation and accountability for emergency management

We have identified options to ensure CDEM Groups are organised effectively, with clearer lines of accountability.

Refer to pages 28–31 of the discussion document to answer the questions in this section.

30. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Please see response provided in issue 5.

31. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

32. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 6.3: Strengthening the performance of Coordinating Executive Groups

We have identified options to strengthen how Coordinating Executive Groups provide advice to and implement the decisions of their CDEM Groups.

Refer to pages 31–32 of the discussion document to answer the questions in this section.

33. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

34. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

35. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 7: Keeping emergency management plans up to date

We have identified options to make it easier to update the National CDEM Plan and CDEM Group plans, reflecting changes to roles and responsibilities.

Refer to pages 33–34 of the discussion document to answer the questions in this section.

36. Do you agree with how we have described this problem?

☒ Yes

☐ No

☐ Not sure / no preference

Please explain your views.

Plans should be easy to update based on improved understanding, new information, technology or lessons learnt from recent emergencies. Engineering New Zealand supports improving the ability to make amendments as required.

37. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

38. Are there any other options that should be considered?

Please explain your views.

Insert response

Other problems relating to this objective

39. Should we consider any other problems relating to responsibilities and accountabilities at the national, regional, and local levels?

Please explain your views.

Insert response

Objective 3: Enabling a higher minimum standard of emergency management

Issue 8: Stronger national direction and assurance

Issue 8.1: Strengthening the Director's mandate to set expectations and monitor performance

We have identified options to enable a wider range of mandatory standards to be set and strengthen the Director's ability to provide assurance about the performance of the emergency management system.

Refer to pages 36–37 of the discussion document to answer the questions in this section.

40. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

41. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Engineering New Zealand supports having national direction to lift the consistency and quality of emergency management across the country. This would help smaller councils and support more consistent interpretation and delivery. National direction should set clear expectations and be supported by practical guidance that defines good practice and how it can be implemented. Particularly, in relation to information sharing and notification systems for response coordination.

To be effective, this direction should be supported by practical guidance that clearly sets out what good practice looks like and how it can be achieved. This approach will support delivery and build confidence in the sector.

We agree with option 2 (non-legislative: increased guidance and strengthened governance). While we agree with a more easily enforceable option (legislative) in principle this can be difficult to operationalise.

It is important that national direction is flexible enough to be adapted to the needs of local communities.

42. Which aspects of emergency management would benefit from greater national consistency or direction?

Please explain your views.

We would like to see better recognition of the role that critical infrastructure providers play and clear expectations around working with them (particularly for large providers that work across multiple regions).

Information sharing and notification system for response coordination would benefit from additional focus.

Additionally, we would like to see a greater focus on emergency preparedness and activities to help support community preparedness in national direction.

43. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 8.2: Strengthening the mandate to intervene and address performance issues

We have identified options to better ensure those with legal emergency management responsibilities are meeting them sufficiently.

Refer to pages 37–39 of the discussion document to answer the questions in this section.

44. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

45. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We are supportive of clear and consistent processes. While we have no comments on the specific options. It is important that interventions are proportionate.

46. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 9: Strengthening local hazard risk management

We have identified options to strengthen the way CDEM Groups, and their members manage the risk of hazards in their areas, including by using CDEM Group plans more effectively.

Refer to pages 39–42 of the discussion document to answer the questions in this section.

47. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We are supportive of clearer and more consistent approaches to managing hazard risk, including having national direction that sets a required standard but allows flexibility to adapt to local contexts.

We defer detailed comments to those with expertise in this space.

48. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

49. What is the right balance between regional flexibility and national consistency for CDEM Group plans?

Please explain your views.

Insert response

50. What practical barriers may be preventing CDEM Group plans from being well integrated with other local government planning instruments?

Please explain your views.

Insert response

51. Are there any other options that should be considered?

Please explain your views.

Insert response

52. Do you think more fundamental changes are needed to enable local authorities to deliver effective hazard risk management? If so, why?

☐ Yes ☐ No ☒ Not sure / no preference

Please explain your views.

Insert response

Issue 10: Strengthening due consideration of taonga Māori, cultural heritage and animals during and after emergencies

Issue 10.1: Considering taonga Māori and other cultural heritage during and after emergencies

We have identified options to ensure the impacts of emergencies on taonga Māori and other cultural heritage is considered appropriately.

Refer to pages 43–45 of the discussion document to answer the questions in this section.

53. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

54. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We support an approach that clarifies process and expectations. We support the proposed options. Better preparation in this space will help mitigate risk to people and preservation of what is important to communities.

Engineering New Zealand has members with significant expertise in heritage preservation and offer our support in developing content that relates to it.

55. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 10.2: Considering animals during and after emergencies

We have identified options to ensure the impacts of emergencies on pets, working animals, wildlife, and livestock is considered appropriately.

Refer to pages 45–47 of the discussion document to answer the questions in this section.

56. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

57. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We support efforts to minimise the risk to people, and efforts to consider animals is a sensible way to help do this. This may require multiple approaches to reflect the difference between pets and livestock/working animals.

58. Noting that human life and safety will always be the top priority, do you have any comments about how animals should be prioritised relative to the protection of property?

Please explain your views.

Insert response

59. Are there any other options that should be considered?

Please explain your views.

Insert response

Other problems relating to this objective

60. Should we consider any other problems relating to enabling a higher minimum standard of emergency management?

Please explain your views.

Insert response

Objective 4: Minimising disruption to essential services

Issue 11: Reducing disruption to the infrastructure that provides essential services

Issue 11.1: Narrow definition of "lifeline utility"

We have identified options to extend emergency management responsibilities to a broader range of infrastructure that provides essential services.

Refer to pages 50–52 and Appendix C of the discussion document to answer the questions in this section.

61. Do you agree with how we have described this problem?

☒ Yes ☐ No ☒ Not sure / no preference

Please explain your views.

Insert response

62. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We support the legislative option (option 3) to replace the lifeline utilities framework with an expanded, principles-based definition of essential infrastructure. Clear accountabilities and strong supporting guidance will be critical. However, it must be clear which infrastructure is covered by this definition and who this applies to (i.e., who is responsible for that infrastructure).

We note that there are a range of reforms happening across Government that utilise a definition of essential infrastructure or something similar. We recommend that wherever possible these definitions are aligned to help reduce confusion and misinterpretation.

63. If we introduced a principles-based definition of "essential infrastructure", are there any essential services that should be included or excluded from the list in Appendix C of the discussion document?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We recommend including:

- entities that provide flood protection infrastructure (such as dams, stop banks/levees, and pump stations), as these are critical to improving resilience.
- essential community services such as hospitals and associated health infrastructure are notably absent and should be included.

64. If you think other essential services should be included in the list in Appendix C, what kinds of infrastructure would they cover?

Please explain your views.

As above. Flood protection infrastructure, including pump stations, stop banks/levees, and other flood attenuation or routing structure will improve resilience. Additionally, essential community services such as hospitals and associated health infrastructure are notably absent and should be included.

65. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 11.2: Strengthening lifeline utility business continuity planning

We have identified options to ensure lifeline utilities have planned effectively for disruption to their services.

Refer to pages 52–54 of the discussion document to answer the questions in this section.

66. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

67. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Engineering New Zealand supports efforts to reduce the disruption to essential infrastructure. We support a regulatory approach to strengthen business continuity planning (option 3), as it allows for flexibility and can be updated as needed. Though it is important that these plans cover how lifeline utilities handle risk reduction, readiness, response and recovery efforts.

Compliance should focus on ensuring risk reduction activities are carried out, this should be monitored. We do not support financial penalties as they take resources away from already impacted people.

68. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 11.3: Barriers to cooperation and information sharing

We have identified options to strengthen cooperation and information sharing between lifeline utilities, CDEM Groups, and other agencies.

Refer to pages 54–57 of the discussion document to answer the questions in this section.

69. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

70. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We support a stronger, nationally consistent approach to cooperation and information sharing. National direction is needed to reduce duplication, address fragmentation across local government, and better support lifeline utilities engaging with multiple councils.

We do not have a preferred option but strongly support the need for national consistency and an approach that does not add undue burden to lifeline utility providers.

71. Because emergencies happen at different geographical scales, coordination is often needed at multiple levels (local and national). Do you have any views about the most effective way to achieve coordination at multiple levels?

Please explain your views.

It is our view that having national direction is the most effective way to achieve coordination across local and national levels. National direction should establish clear expectations for performance and ensure consistency while supporting councils. Particularly smaller/less resourced ones, to deliver high-quality emergency management service. This should be backed by practical guidance that sets out what good practice looks like and how it can be achieved.

72. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 12: Strengthening central government business continuity

We have identified options to ensure central government organisations have planned effectively for disruption to their services. This includes options to expand the range of central government organisations recognised in the Act.

Refer to pages 57–60 of the discussion document to answer the questions in this section.

73. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

74. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Engineering New Zealand supports efforts to reduce the disruption to essential infrastructure, including critical services provided by central government.

75. Are there any other options that should be considered?

Please explain your views.

Insert response

Other problems relating to this objective

76. Should we consider any other problems relating to minimising disruption to essential services?

Please explain your views.

Insert response

Objective 5: Having the right powers available when an emergency happens

Issue 13: Managing access to restricted areas

We have identified options to improve the way cordons are managed.

Refer to pages 61–63 of the discussion document to answer the questions in this section.

78. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

79. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Engineering New Zealand supports efforts to reduce the barriers that make it harder for engineers to rapidly assess infrastructure and buildings post emergency. It is important that engineers can provide this service as quickly and efficiently as possible.

Our preferred option is option 3. We support improving access arrangements to restricted areas during emergencies. We recommend including “suitably qualified engineers” in the list of those eligible to receive identification.

We support clarifying access powers and recommend the use of guidance to help those navigate the accreditation processes. Engineering New Zealand is happy to play a role in this space and assist as needed.

80. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 14: Clarifying who uses emergency powers at the local level

We have identified options to ensure emergency powers sit with the most appropriate people at the local government level.

Refer to pages 63–65 of the discussion document to answer the questions in this section.

81. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We agree with the issues identified. Clearer accountability for the use of emergency powers at the local level is needed. We support changes to clarify roles and responsibilities and emphasise the need for this to be reflected in national standards

82. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

83. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 15: Modernising the process to enter a state of emergency or transition period

We have identified options to remove the requirement for a physical signature to declare a state of emergency or give notice of a transition period.

Refer to pages 65–66 of the discussion document to answer the questions in this section.

84. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

We agree with the issues identified.

85. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

We are supportive of the need for clear and practical processes to enable responses to happen as quickly as possible. We support enabling both electronic and verbal declarations.

Additionally, it is important that more than one person be authorised to declare a state of emergency to avoid delays and allow response efforts to begin immediately.

86. Are there any other options that should be considered?

Please explain your views.

Insert response

Issue 16: Mayors' role in local state of emergency declarations and transition period notices

We have identified options to make mayors' role in local state of emergency declarations and transition period notices more explicit.

Refer to pages 66–68 of the discussion document to answer the questions in this section.

87. Do you agree with how we have described this problem?

☒ Yes ☐ No ☐ Not sure / no preference

Please explain your views.

Insert response

88. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

Please explain your views.

Insert response

89. Are there any other options that should be considered?

Please explain your views.

Insert response

Other problems relating to this objective

90. Are there any circumstances where Controllers or Recovery Managers may need other powers to manage an emergency response or the initial stages of recovery more effectively?

Please explain your views.

Insert response

Other comments

91. Do you have any other comments relating to reform of New Zealand's emergency management legislation?

We recommend some thought is given to the integration of our laws and policies on infrastructure development and recovery. New Zealand has limited sources to address its growing infrastructure deficit. We know there are increasing efforts across Government to prioritise funding for maintenance of what we have and carefully choosing what new infrastructure we build across the country. Care is needed for any recovery to ensure a cost/benefit approach is still maintained.

It would be beneficial if the legislation clarified accountabilities, responsibilities and funding for preparing/coordinating and maintaining a national hazards map – which is needed to support all stages of emergency management.