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Kia ora

Strengthening New Zealand's emergency management legislation consultation

Thank you for the opportunity to provide feedback on this consultation on options to strengthen New Zealand's emergency management system.

Who we are

The Association of Consulting and Engineering New Zealand (ACE New Zealand) is an incorporated society – a firm-based membership organisation representing around 270 professional services firms and more than 16,000 people working across the built and natural environments.

Our members range from large global firms to employee-owned small and medium enterprises, employing specialists including engineers, project managers, planners, scientists, architects, surveyors and other technical disciplines. Our teams contribute significantly to Aotearoa New Zealand's economy by advising, designing and delivering on critical technology, policies and practices, and construction and infrastructure across the built and natural environment in Aotearoa.

Our members have a deep understanding of the policy and stakeholder issues linked to the economic wealth, wellbeing and prosperity of our society, as well as project design, delivery and decision-making, from our largest infrastructure projects in New Zealand through to smaller community projects.

General comments

Overall, ACE New Zealand supports the intent of the review and agree the current legislation needs to be updated. In particular, we consider the focus on strengthening community and Māori participation, and providing clear roles and responsibilities and lines of accountability are a step in the right direction. However, it is our view that more work is required to ensure we have a resilient, fit for purpose emergency management system that is able to respond to the increasing frequency of emergency events, and better supports efficient response, as well as recovery with the best outcomes for the impacted stakeholders. We also consider further consideration needs to be given to risk reduction and resilience and how this integrates with other government reforms being undertaken.

Below we outline the areas where we consider requires further consideration. We respond to the specific questions and options in the attached submission form.

Strengthening capability

The potential impact of an emergency event on the built environment (buildings and infrastructure) is significant. Following a significant event or during a state of emergency, engineering resources are needed urgently to support infrastructure owners and civil defence. In order for the sector to be able to respond appropriately, we need to ensure the appropriate skills and expertise can be mobilised when needed. This includes engineering skills to inspect damage and identify or design both short term (temporary) and long-term engineering solutions. Currently, we are missing a framework for the procurement of those skills which results in challenges with access to relevant capability, and inconsistencies in how work is instructed and contracted which can have numerous downstream impacts.

ACE New Zealand is currently working on developing a framework to provide more consistency in the way professional services are engaged and deployed during an emergency event response, feeding into the Nelson-Tasman Emergency Management resilience project funded by NEMA. We would welcome the opportunity to discuss this work with NEMA.

Protecting from civil liability

We support the focus on protections of civil liability for responding to an emergency.

ACE members play a central role in emergency response, including engineers providing rapid response engineering assessments, providing technical advice to search and rescue teams, undertaking safety assessments of critical infrastructure, and impact assessment for utility and transport services. Those undertaking these initial assessments often do so with limited time, resources and information available to them. This exposes them to future challenges in the case of reassessment, which is what we saw in the Christchurch earthquake response.

Liability concerns are a barrier to participation, particularly for businesses. To protect those professionals acting in good faith in an emergency, it is our view that this legislation should be strengthened to specifically include people working under the direction/delegated authority of either the responsible person (BA) or controller (CDEMA). This would ensure that those appropriately qualified to respond, such as engineers, are protected but does not encourage people to operate outside of their capability to undertake roles they are not qualified to do, thus potentially putting both themselves and others at risk, or open up the potential for abuse.

To better protect businesses that contribute to emergency response they should be supported through pre-event agreements that clarify roles, expectations, and cost recovery. ACE New Zealand is currently working on developing a framework to provide more consistency in the way professional services are procured in an emergency. We would welcome the opportunity to discuss this work with NEMA.

Strengthening the recovery framework

As we have seen emergency events are increasing in frequency and severity. This means that while we need to strengthen how we respond to these events, we also need to consider how we minimise risks and prepare ahead of an emergency, as well as how we recover following an event.

It is our view that the proposed legislation and changes are focussed on response, and there needs to be a greater focus on preparation and recovery.

Conclusion

Overall, we see this review of the emergency management legislation as positive and while the update is a step in the right direction, there are several areas which we consider require further consideration, as summarised above, and detailed further in our attached submission.

We would be happy to discuss any aspect of this submission.

Nga mihi,

Helen Davidson
Chief Executive

Consultation questions

1. Have we identified the right objectives for reform?

While we generally agree with the objectives identified, we consider there is opportunity for a greater focus on strengthening our infrastructure resilience.

Given the increasing risks to infrastructure caused by emergency events, it is important that we have a focus on infrastructure resilience, including regulating what is our essential infrastructure locally, and being clear on what are the risks to local communities caused by widespread infrastructure failure. This will enable us to collectively prevent the impact and reduce the consequences, but then also be more prepared to recover faster, lessening the impact of an emergency on the community, and the scale of the emergency management response needed.

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 the proposed changes and are of the view that this adequately addresses the diverse needs of a community.

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

Please explain your views.

> Those with pre-existing vulnerabilities that may impact their ability to prepare or response to an emergency.
>
> Many communities in New Zealand are more exposed to climate related hazard. Further, some communities in New Zealand may be isolated for some time so further consideration may need to be given to addressing the needs of communities in these situations.

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.

While we support an approach that allows some flexibility (option 2), a legislative approach (option 3) would ensure better preparedness across regions. However, this will require additional resources to allow for CDEM Groups to engage in a meaningful way.

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.

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 the way this problem is described.

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.

We agree that iwi Māori are uniquely positioned and play a significant role in the response and recovery following an emergency, but that is not fully acknowledged or drawn on to make the system more effective.

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.

We note the work already done to provide these connections between Iwi Māori and CDEM, such as He Rau Aroha (discussed below). We note that there has already been a lot of work already done to provide these connections between Iwi Māori and CDEM. We refer to the strategic plan

titled "He Rau Aroha", dated June 2024 (a copy is available on request). This plan seeks to provide a "by Māori, for Māori" approach to preparing and strengthening Māori communities ahead of natural disasters, and to contribute to the future of infrastructure supporting those communities. Considerable thought has gone into the strategy, and the group of Māori professionals involved would provide many valuable connections into communities that NEMA would be seeking to engage with.

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.

Coordinating Executive Groups must actively include iwi representatives in strategic planning discussions while respecting their leadership role during disaster responses.

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.

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.

We agree with the intent to improve communities' ability to participate in emergency management.

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.

Developing clear guidance and strengthening public education can enhance community awareness and improve trust between CDEM Groups and local organisations. We note that marae often become response centres during an emergency with limited integration into formal systems. Furthermore, providing more certainty around reimbursement will support more efficient decision making during an event.

In relation to the options presented we generally agree with Option 2 but without legislation there is a risk that guidance will not be consistently followed across regions. Therefore, Option 3 is the preferred option, although additional funding may be required for training and resources.

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

Please explain your views.

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.

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 support the recognition that individuals, communities, and businesses are often the first to respond in an emergency.

ACE members play a central role in emergency response, including engineers providing rapid response engineering assessments, providing technical advice to search and rescue teams, undertaking safety assessments of critical infrastructure, and impact assessment for utility and transport services. Those undertaking these initial assessments often do so with limited time, resources and information available to them. This exposes them to future challenges in the case of reassessment, which is what we saw in the Christchurch earthquake response.

Liability concerns are a barrier to participation, particularly for businesses. To protect those professionals acting in good faith in an emergency, it is our view that this legislation should be strengthened to specifically include people working under the direction/delegated authority of either the responsible person (BA) or controller (CDEMA). This would ensure that those appropriately qualified to respond, such as engineers, are protected but does not encourage people to operate outside of their capability to undertake roles they are not qualified to do, thus potentially putting both themselves and others at risk, or open up the potential for abuse.

To better protect businesses that contribute to emergency response they should be supported through pre-event agreements that clarify roles, expectations, and cost recovery. ACE New Zealand is currently working on developing a framework to provide more consistency in the way professional services are procured in an emergency. We would welcome the opportunity to discuss this work with NEMA.

We are supportive of an approach that provides protection from civil liability while enabling compensation for directed labour costs.

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

Please explain your views.

ACE New Zealand is currently working on developing a framework to provide more consistency in the way professional services are procured in an emergency. We would welcome the opportunity to discuss this work with NEMA.

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.

We agree there needs to be clearer direction and lines of responsibility. However, it is the view of our members that this objective is too focused on roles and responsibilities during an emergency and should also more fully consider responsibilities in preparing for an emergency and that there needs to be more of focus around the national response. For example, resilience to flooding may be able to be improved through national-level investment in flood response equipment (e.g portable flood barriers as used in the UK) that could be deployed where needed ahead of forecast storms. Systems for capturing and storing perishable data during an event may also be most cost-effectively delivered at a national level.

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.

It is our view that a national approach is needed with clear leadership and coordination across agencies. We are generally supportive of Option 3 and consider this approach, supported by local risk vulnerability assessments, would enable faster, more informed decision-making.

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

1.1.1 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.

Insert response

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.

The options presented all have strengths and weaknesses depending on the scale of the emergency or hazard. The options also assume on effective communications being available between groups at all times. The options also assume a consistent information exchange process between organisations.

There is a significant risk of delays with each layer of command and control, but the efficiency gain with deployment of limited regional resources may offset this risk. Ideally there needs to be a mechanism to scale the incident command and control structure to permit delegation of some functions in order to reduce the demands on the controller as they may become overwhelmed with information with impacts their ability to respond in a timely manner. A consistent information model would also support volunteer support when providing resources to support 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.

Insert response

1.1.2 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.

> Insert response

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.

> CDEM groups can drive consistency with planning which can facilitate command and control. CDEM groups can also drive consistency with information models, facilitating response process (reducing complexity with obtaining timely decisions).
>
> Local authorities may not recognise the differences in operational procedures when pivoting from a BAU (or small-scale emergency) to a large-scale event. Specifically, when communications systems and information flows may need to pivot to a different platform. CDEM groups could support local authorities with identifying resources that may not be apparent – using a more consistent risk assessment and engagement process.

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

Please explain your views.

> Insert response

1.1.3 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.

> We support Option 3.
>
> Interoperability will likely be essential with responding to a significant natural event.
>
> Given the probability of events as presented in the hazards context, pre-planning response for credible events within regions provides a higher likelihood of more timely responses. This would be on the basis of a better understanding of response and recovery requirements.

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.

We agree that National CDEM and CDEM Group plans need to be kept up to date.

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.

We are supportive of these being kept up to date, allowing for minor amendments as necessary. There needs to be a balance between reducing the administrative burden and ensuring plans remain current and actionable.

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

1.1.4 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.

We are generally supportive of Option 4 to ensure compliance, although Option 3 would provide more flexibility.

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

Please explain your views.

In our view a nationally coordinated approach to all possible modes of communication and information exchanges should be considered. This would be supported through better definition of responsibilities in preparing for an emergency.

CIMS type models rely on organisations switching from a "comfortable" BAU type approach to a more complex and agile way in which data flows have to be coordinated. Such coordination can take time and slow response, lead to confusion and generally impede response. This is particularly problematic if the emergency extends to cover multiple local authorities who may have quite different BAU process.

Further consideration of accountability within the legislation will be critical to ensuring effective introduction and continuous improvement within the Emergency Management sector. Legislation around hazard and wider risk management is varied and reflects a reasonably high-risk tolerance, especially when compared to other OECD countries. The Emergency Management Bill provides the ideal place to bring together wider risk management practices and integrate across sectors.

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

Please explain your views.

Insert response

1.1.5 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.

Insert response

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.

Insert response

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.

Regional flexibility is likely required with CDEM group plans, but consistency is also needed on how they identify essential services.

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

Please explain your views.

Strengthening consistency of CDEM group plans will greatly facilitate command and control functions.

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

1.1.6 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 are generally supportive of Option 2 and support the development of guidance, however a non-legislative approach may result in inconsistencies in application. Therefore we consider Option 3 should be considered.

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

Please explain your views.

> In the first instance it would be good to build on existing guidance. However, establishing dedicated funding streams to support iwi-led initiatives aimed at protecting taonga Māori during emergencies should be considered.

1.1.7 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.

> Insert response

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

1.1.8 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 are supportive of expanding the definition of essential infrastructure to reflect the evolving interdependencies between services and the increasing complexity of risk. A nationally consistent framework—led by NEMA—is needed to identify and manage these interdependencies across agencies and lifeline asset owners. Without this, regional efforts remain inconsistent, and critical gaps in scenario planning persist.

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.

Insert response

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.

Insert response

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

Please explain your views.

Insert response

1.1.9 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.

> We support a regulatory approach as this will help drive consistency and improved performance over time. However, we consider that financial penalties should only be used as a last resort so consider Option 3 would be the most appropriate approach.

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

Please explain your views.

> Insert response

1.1.10 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 Option C - Support better information sharing.
>
> CDEM groups need to have a good relationship with lifeline utilities to ensure efficient information sharing and this should be kept current. This expedites response and provides a social license back to lifeline utilities.

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.

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.

Central government agencies, due to their scale and the services they provide to the community, should also be considered.

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.

We are generally supportive of Option 2 and support 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.

> We agree there needs to be better guidance and consistency to support relevant providers being able access restricted areas in an emergency. We support the ability for accreditation to be issued prior to an emergency, with the ability to issue more during an emergency, to minimise delays in the ability to respond.

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 clearer accountability is needed.

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.

Insert response

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 agree with the need to modernise processes to support an efficient response and avoid delays.

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?

Insert response