

20 May 2025

Via email: [EmergencyManagementBill@nema.govt.nz](mailto:EmergencyManagementBill@nema.govt.nz)

Tēnā koe,

## **FEEDBACK TO THE NATIONAL EMERGENCY MANAGEMENT AGENCY ON STRENGTHENING NEW ZEALAND'S EMERGENCY MANAGEMENT LEGISLATION DISCUSSION DOCUMENT**

Thank you for the opportunity to present this feedback from Queenstown Lakes District Council (**QLDC** or **Council**) to the National Emergency Management Agency (**NEMA**) regarding its discussion document Strengthening New Zealand's Emergency management legislation.

QLDC welcomes the proposed reforms and supports efforts to build a more resilient, equitable, and locally responsive emergency management system. Council's feedback draws on practical experience managing a range of emergency events and reflects strong support for the position expressed in the submission by Taituarā – Local Government Professionals Aotearoa.

As a fast-growing district with a unique combination of geographical isolation, high visitor numbers, and a diverse, mobile population, QLDC faces distinctive emergency management challenges. It supports the overall direction of the proposed reforms and emphasises the importance of:

- recognising and preserving the critical role of local government;
- embedding meaningful iwi participation across all levels of emergency management; and
- ensuring sustainable resourcing and capacity-building at the local level.

QLDC appreciates the opportunity to contribute to the development of a stronger, more inclusive emergency management framework and look forward to continued collaboration with NEMA and sector partners to improve outcomes for our communities.

Nā māua noa, nā,



**Mike Theelen**  
Chief Executive

## FEEDBACK TO NEMA ON STRENGTHENING NEW ZEALAND'S EMERGENCY MANAGEMENT LEGISLATION DISCUSSION DOCUMENT

### QLDC context

- 0.1 Queenstown-Lakes District (QLD) is a district with an average daily population of 80,910 (visitors and residents) and a peak daily population of 121,365. By 2055 this is forecast to increase to 146,646 and 219,969 respectively<sup>1</sup>.
- 0.2 The QLD is one of the fastest-growing in New Zealand and is characterised by a highly mobile, multicultural population with a significant number of migrant workers, international visitors, and residents with limited English proficiency. The district has the fourth busiest airport in the country with over 2.5M passenger arrivals in 2024<sup>2</sup>.
- 0.3 The district also has several communities in remote or geographically isolated locations (e.g. Glenorchy, Makarora, Kingston) and a large daily transient population of tourists (e.g. day trips to Milford) and outdoor recreationists exploring remote and hard-to-access locations (e.g. Department of Conservation hikes). The combination of these factors places unique challenges on QLDC in terms of natural hazard risk reduction, community resilience development and emergency management planning.
- 0.4 QLDC is a partner council within Emergency Management Otago, which is the operational arm of the Otago Civil Defence Emergency Management (CDEM) Group. This regionally coordinated model provides support for emergency planning, response, and recovery efforts across the region.
- 0.5 In addition to partnering in the Group CDEM structure, QLDC also delivers local emergency management services to its community through the local Emergency Operations Centre (EOC). QLDC and EMO staff work together to ensure there is professional capability and capacity to activate the EOC, as well as working collaboratively on BAU work programmes focused on community preparedness, hazard risk reduction, and response readiness that are tailored to the unique needs of the Queenstown Lakes District.
- 0.6 QLDC maintains a close partnership with Kāi Tahu as mana whenua of the district. QLDC is committed to working in partnership with the seven Papatipu Rūnaka with shared interests in the district, to strengthen their role in emergency management planning, response, and recovery.
- 0.7 This submission has been structured in order to directly respond to the issues that NEMA has highlighted as part of this consultation process.

### OBJECTIVE 1: STRENGTHENING COMMUNITY AND IWI MĀORI PARTICIPATION

#### Issue 1: Meeting the diverse needs of people and communities

- 1.1 QLDC acknowledges the importance of ensuring that New Zealand's emergency management system is inclusive, equitable, and responsive to the diverse needs of our communities. It is

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<sup>1</sup> <https://www.qldc.govt.nz/community/population-and-demand>

<sup>2</sup> <https://www.queenstownairport.co.nz/facts-figures>

vital that emergency planning and response systems are designed with these diverse needs in mind to ensure safety, inclusion, and effective communication during emergencies. This extends to embedding the principle of equity within core response and recovery objectives.

- 1.2 For issue 1, QLDC recommends that improvements are delivered through a combination of options 2,3 and 4. The combination of these legislative and non-legislative approaches will strengthen capability and ensure accountability for delivery of improved equity outcomes:
  - **Option 2** (non-legislative): Develop guidance on meeting diverse needs.
  - **Option 3** (legislative): Require Civil Defence Emergency Management (CDEM) Group plans to include how people and communities that may be disproportionately affected will be planned for.
  - **Option 4** (legislative): Require the Director to consult with representatives of disproportionately affected communities to inform national planning.
- 1.3 In addition, QLDC recommends that NEMA also places a focus on the necessary resourcing, funding and professional development required by Group CDEM and local authorities to deliver a more inclusive and equitable emergency response.
- 1.4 The National Disaster Resilience Strategy<sup>3</sup> places significant focus on a 'whole-of-society' approach to emergency management, which needs to be activated locally but with centralised support. QLDC and Emergency Management Otago have invested significant resource into this space through the development of the Community Resilience Group network, which consists of volunteers from communities across the district as well as the QLDC Welcoming Communities Plan<sup>4</sup>, which includes a focus on emergency management preparedness for migrant communities.
- 1.5 These groups can provide an important service in terms of connecting within communications, targeted outreach, and education programmes. However the resources and tools that these group share to support greater inclusion and equity such as translated resources and accessibility upgrades for readiness and response information are complex and costly to deliver at a local and regional level. These would benefit from the economies of scale and professional capability that can be accessed through central government.

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

- 2.1 QLDC recognises the importance of upholding Te Tiriti o Waitangi principles and ensuring that iwi, hapū, rūnaka, and Māori communities are active partners and decision-makers in emergency planning, response, and recovery. This is crucial for achieving equitable, culturally appropriate, and community-led outcomes.
- 2.2 Mana whenua such as Kāi Tahu have long-standing relationships with the land and communities. Their knowledge, leadership, and tikanga are invaluable to building a resilient emergency management system that reflects the needs of all our people.
- 2.3 QLDC recommends that improvements are delivered through a combination of options 2 and 3:
  - **Option 2** (non-legislative): Address the roles of iwi Māori in plans, guidance, and other policy settings

<sup>3</sup> <https://www.civildefence.govt.nz/resources/publications/national-disaster-resilience-strategy/>

<sup>4</sup> <https://www.qldc.govt.nz/community/welcoming-communities/our-welcoming-plan/>

- **Option 3** (legislative): Require iwi Māori representation on CDEM Group decision-making structures
- 2.4 Further, the following are recommended to support effective Māori participation:
- Provide dedicated training, and resources to iwi, hapū, rūnaka and Māori organisations to support their participation in planning and operational roles and ensure they are not taken for granted as welfare hubs.
  - Reform Section 33 of the Guide to the National CDEM Plan to ensure there is a culturally appropriate funding mechanism for marae and iwi to access for timely reimbursement of welfare emergency response costs without unnecessary administrative barriers.
  - Allow flexibility to tailor iwi engagement to regional and local contexts, recognising the distinct identities and governance structures of iwi across the motu.
  - Include iwi as partners in scenario planning, training, and emergency exercises to strengthen operational integration.

### **Issue 3: Strengthening and enabling community participation in emergency management**

- 3.1 QLDC strongly supports the intent to strengthen and better enable the vital role that communities, local organisations, and individuals play before, during, and after emergencies.
- 3.2 While voluntary engagement and local initiatives are valuable, the system needs greater structure, consistency, and visibility to ensure communities are not just willing, but equipped and prepared to enable a **whole-of-society** approach to emergency management.
- 3.3 QLDC recommends that improvements are delivered through a combination of options 2 and 3:
- **Option 2** (non-legislative): Develop and update guidance and strengthen public education.
  - **Option 3** (legislative): Require CDEM Group plans to state how the Group will manage offers of resources from the public.
- 3.4 The development and promotion of non-legislative tools such as guidance, templates, and community education resources can help clarify how community offers of support can be coordinated and integrated, what kinds of pre-event agreements need to be established, and set expectations around how reimbursement or liability can be managed clearly and fairly. Importantly, such resources should be co-designed with local government, iwi, and community organisations to ensure they are practical, adaptable, and locally relevant.
- 3.5 The adoption of legislative requirements around community participation will also help reinforce the principle that emergency management is a whole-of-society responsibility.

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

- 4.1 QLDC acknowledges that local community members are often the first responders in emergency events, providing essential support in the immediate aftermath of a crisis. Empowering this community action is critical to improving the overall effectiveness, efficiency, and equity of emergency management across New Zealand.
- 4.2 This is particularly relevant in the QLD, where geographic isolation, tourism infrastructure, and limited emergency services in some areas mean that community resilience and self-reliance are an accepted and necessary part of emergency response activity.

- 4.3 QLDC supports proposals to extend protection from civil liability to individuals and businesses who take reasonable, good-faith actions during an emergency where there is no time to seek formal direction from a Controller or constable. We agree that the current framework requiring direction for protection to apply does not reflect the operational reality of many emergencies, particularly in remote or fast-evolving events.
- 4.4 QLDC recommends that improvements are delivered through a combination of options 2 and 3:
  - **Option 2** (legislative): Provide for protection from civil liability.
  - **Option 3** (legislative): Enable compensation for labour costs.
- 4.5 By providing enhanced legal protection for community responders, a potential deterrent to early action can be removed, and legislative settings brought into alignment with public expectations and operational practice.
- 4.6 Similarly, broadening compensation eligibility to include reasonable labour costs incurred by individuals and businesses who are directed by Controllers or constables will help remove potential barriers to operational delivery. For example, a contractor with specialist skills or heavy machinery may incur significant opportunity costs in responding to a Controller's direction. Without fair compensation, these businesses may be reluctant or unable to offer their support during future events.
- 4.7 QLDC recommends that any changes in liability or compensation be accompanied by clear public guidance on what protections apply and in what circumstances, to avoid confusion during an already stressful time.

## **OBJECTIVE 2: PROVIDING FOR CLEAR RESPONSIBILITIES AND ACCOUNTABILITIES AT THE NATIONAL, REGIONAL, AND LOCAL LEVELS**

### **Issue 5: Clearer direction and control during an emergency**

- 5.1 QLDC supports the intent to clarify and strengthen direction and control arrangements during emergencies. Greater clarity will support more effective, timely, and coordinated responses especially when emergencies span multiple jurisdictions or involve concurrent hazards (e.g. flooding and landslides).
- 5.2 The QLD is exposed to multiple hazards, including seismic, severe weather, wildfire, and infrastructure failure. Coordination between the local authority, regional and national controllers, as well as the different emergency services agencies who have a role in leading the response must be seamless, especially during complex, time critical events.
- 5.3 QLDC supports:
  - **Option 2-** Require the agency dealing with the specific hazard to be the "Control Agency".
- 5.4 This option ensures that the agency with the greatest subject matter expertise in controlling or suppressing the hazard (e.g. Fire and Emergency New Zealand (FENZ) for wildfire or NZ Police for a terrorism act) are the control agency who are charged with making time critical decisions

and holding operational accountability. This provides clarity of decision-making authority and accountability during the critical time period when the community are at risk.

- 5.5 It is acknowledged however that all control models rely heavily on the question of who is lead agency prior and post a declared Local State of Emergency (SoE). If a SoE is not declared, then both FENZ and NZP will likely be the lead agency under the examples listed above. This would then likely shift to CDEM after a SoE is declared. A SoE by its nature is only declared if the emergency services agency leading the response is overwhelmed, so they may not be in the best position to continue to be control/lead at this is point. This is a critical shift that must be judiciously evaluated based on the context of the event and the balance of which agency has the greater challenge to meet. The context of this response requirement should therefore dictate who is the lead/control agency rather than pre-determined designations.
- 5.6 To help improve the performance of response control for multi-agency events, QLDC recommends the following be considered:
- Require joint planning, scenario exercises, and relationship-building between key leadership roles prior to events to reduce confusion during response.
  - Ensure direction and control structures are flexible and scalable based on event magnitude, location, and impact, while maintaining local knowledge at the core.
  - Establish clear protocols and systems for real-time information sharing between all levels of response leadership and stakeholders.

#### **Issue 6: Strengthening the regional tier of emergency management**

- 6.1 QLDC supports the intent to strengthen the regional tier of emergency management and recommends that this be done in a way that maintains strong local input, resourcing equity, and community responsiveness. While greater regional consistency and coordination can improve efficiency and capability, it's important that any reform avoids creating overly centralised model that diminishes the flexibility, responsiveness, presence and visibility of emergency management at the local level, especially in geographically large and diverse regions like Otago.
- 6.2 A balance between regional coordination with local delivery should be aimed for, that avoids over-centralising of functions that are more effective when delivered locally, such as community engagement and public education.
- 6.3 The current CDEM Act 2002 sets out that local authorities are both individually as well as jointly responsible for emergency management. The CDEM Group and each local authority member have the same functions in emergency management with little distinction between what the CDEM Group is responsible for (local authorities jointly) and what each local authority is responsible for individually. While regional coordination is beneficial, there can be a lack of clarity between local and regional roles, particularly in operational response and public communications, which can result in confusion or delays.
- 6.4 For issue 6.1, QLDC supports:
- **Option 2** (legislative) - provide distinct responsibilities for CDEM Groups and their local authority members.
- 6.5 This option will help define the operational, planning, communications, and funding responsibilities of CDEM Groups, regional councils, and territorial authorities. It will also clarify the role of the Administering Authority. As an example, ORC administers EMO, but

operational responsibility in emergencies often rests with territorial authorities. Clarifying these dual roles would ensure that each party has full clarity on the boundaries of responsibility and accountability.

- 6.6 Although legislative changes to clarify responsibilities are preferred, QLDC has concerns over the use of legislation to control the organisation and accountability of locally delivered emergency management. A one-size-fits-all legislative model is unlikely to succeed as regional and local authorities require flexibility to accommodate different regional arrangements.
- 6.7 For Issue 6.3, QLDC supports:
- **Option 2** (non-legislative) -Update guidance and provide models for how CDEM Groups and local authorities could organise emergency management in their region.
- 6.8 NEMA is well placed to develop guidance on best-practice governance models and local-regional partnerships to help guide decision-making over which model to adopt and how to benchmark performance.

### **Issue 7: Keeping emergency management plans up to date**

- 7.1 QLDC supports the need for a more structured and responsive approach to updating emergency management plans at both the local and national levels. In a rapidly changing environment with increasing climate-related risks, evolving community expectations, and emerging technologies, it is essential that emergency management plans have the flexibility and agility to be regularly updated.
- 7.2 QLDC recommends that a more agile approach is delivered through:
- **Option 3** (legislative): The National CDEM Plan isn't required to be made by Order in Council, but retains its legislative status.
- 7.3 To help improve the quality of emergency plans across the country it is suggested that NEMA publish standardised templates and best-practice guidance, as well as facilitating access to latest scientific data and modelling to help ensure consistency and clarity in plan structure and content. Clear review triggers could also be adopted to require plan updates following major events, legislative changes, or significant shifts in local hazardscape, population, or infrastructure investment.
- 7.4 Funding and resourcing should also be reviewed. Plan updates require time and expertise. Additional resourcing or co-funding from central government may be needed to support councils and regional CDEM Groups with this activity.

## **OBJECTIVE 3: ENABLING A HIGHER MINIMUM STANDARD OF EMERGENCY MANAGEMENT**

### **Issue 8: Stronger national direction and assurance**

- 8.1 QLDC supports the intent of developing stronger assurance mechanisms to ensure parties with responsibilities under the CDEM Act 2002 are meeting them at the expected level. Local authorities, including QLDC, rely on national guidance to align planning and capability development with best practice and statutory requirements. Given the increasing scale and complexity of emergencies, particularly climate-related events, there is a clear need for NEMA

and the Director to play a stronger leadership role in setting expectations and monitoring performance. A clear and robust mandate for the Director can lift system performance, ensure greater national consistency, and drive continuous improvement across the sector.

- 8.2 For Issue 8.1, QLDC supports:
- **Option 3** (legislative): Enable a wider range of mandatory standards to be set through rules.
- 8.3 QLDC stresses that the Director’s oversight role should enable rather than constrain local innovation and responsiveness, and any strengthened mandate must be carefully implemented to respect the devolved nature of emergency management, and the autonomy and accountability of local authorities.
- 8.4 For Issue 8.2, QLDC supports the Taituāra position that more work is needed before a new compliance framework can be established for CDEM, and that performance improvements to the national emergency system will be driven through the enabling measures within the new CDEM Act.

### **Issue 9: Strengthening local hazard risk management**

- 9.1 QLDC strongly supports the proposal to strengthen local hazard risk management. The increasing complexity and frequency of natural hazards, including those driven by climate change, demands more robust, integrated, and proactive risk management at the local level. Local authorities like QLDC are already involved in significant natural hazard planning and management, but these would benefit from clearer roles and responsibilities, improved access to data and modelling, and enhanced coordination across sectors.
- 9.2 Local authorities also have a vital role in building community resilience for those who live in close proximity to natural hazards and must be supported with tools, funding, and guidance to deliver on this more effectively.
- 9.3 Any new legislation must enable and incentivise integrated risk management planning with land use, climate adaptation, and infrastructure investment and have provide clearer thresholds around the acceptable level of risk.
- 9.4 QLDC supports:
- **Option 2** (non-legislative): Provide clearer guidance about what it means to achieve an “acceptable” level of risk.
- 9.5 This guidance should focus on the respective responsibilities of local authorities, CDEM Groups, regional councils, and national agencies in hazard risk management, and remain flexible to accommodate the challenges of areas with a highly complex hazard scape like Queenstown Lakes. Opportunities should also be explored to align hazard risk management obligations across the emergency management, climate adaptation, RMA, and infrastructure planning systems.

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

- 10.1 QLDC supports the proposals under Issue 10 and acknowledges that protecting taonga Māori, cultural heritage, and animals in emergencies is an important part of a people and values-

centred emergency management system. The increasing frequency of emergencies makes it essential that these values are considered in emergency planning and response as well as recovery. However, any new obligations must be clearly defined, resourced, and balanced alongside the imperative to preserve life and ensure operational effectiveness during a response.

10.2 The pre-identification of important sites, cultural practices, or assets along with agreed protection protocols prior to emergencies is required to ensure the best response and recovery outcomes are achieved.

10.3 For Issue 10.1, QLDC supports:

- **Option 2** (non-legislative): Develop guidance on considering taonga and other cultural heritage.

10.4 For Issue 10.2, QLDC supports:

- **Option 2** (non-legislative): Develop guidance on considering animal impacts.

## OBJECTIVE 4: MINIMISING DISRUPTION TO ESSENTIAL SERVICES

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

11.1 QLDC agrees that reducing the risk and improving the resilience of interdependent essential services, such as water, power, transport, and communications is a critical concern for emergency response and community recovery, especially in geographically remote and hazard-prone areas like the QLD. To help enable this, QLDC supports the need for national legislation to expand the existing narrow definitions and outdated terminologies.

11.2 QLDC notes that the term “essential infrastructure” has appeared to replace the term “critical infrastructure”, which had been adopted in the reform programme led by Department of Prime Minister and Cabinet (DPMC). QLDC questions the value of this, as it resets the significant progress that has been made to replace the outdated phrase “Lifeline Utilities” with “Critical infrastructure”. QLDC expresses its preference to commit to the term “critical infrastructure”.

11.3 For Issue 11.1 QLDC supports:

- **Option 3** (legislative): Replace the lifeline utilities framework with an expanded, principles-based definition of “essential infrastructure”.

11.4 QLDC also recognises the importance of strengthening business continuity planning and supports a legislative response to drive greater levels of compliance and accountability, noting that non-legislative interventions have historically failed to drive progress in this space.

11.5 For Issue 11.2, QLDC supports:

- **Option 3** (legislative): Introduce financial penalties and enable detailed business continuity planning requirements to be set through regulations.

11.6 It is noted that considerable investigation has been undertaken by the DPMC around a Planned Emergency Levels of Service (PELOS) framework which sets pre-defined targets for infrastructure providers on how they will deliver services during and after an emergency. This framework may be a suitable starting point for the development of a business continuity focussed regulatory programme.

11.7 Conversely, QLDC supports a non-legislative approach to improve cooperation and information sharing. Strong relationships and trust underpin effective partnerships which are critical to the delivery of emergency management, and these can be eroded through a legislative model that dictates the requirements for cooperation.

11.8 For Issue 11.3, QLDC supports:

- **Option 2** (non-legislative): Strengthen assurance and develop standards and guidance.

11.9 This option will help set clearer expectations and drive improvement between organisations while not impacting on their autonomy to adopt best practice voluntarily.

## OBJECTIVE 5: HAVING THE RIGHT POWERS AVAILABLE WHEN AN EMERGENCY HAPPENS

### Issue 12: Strengthening central government business continuity

12.1 Like many local authorities, QLDC notes the disparity in business continuity requirements placed on local government in the CDEM Act 2002, compared with those placed on central government agencies. Unlike many key agencies, local government has a legislative requirement to function to the fullest possible extent, during and after an emergency<sup>5</sup>.

12.2 QLDC therefore strongly supports the introduction of a minimum legislative standard of business continuity planning for central government agencies that reflects the expectations already placed on local government.

12.3 To deliver this requirement, QLDC supports:

- **Option 4** (legislative): Extend current business continuity requirements to a broader group of central government organisations, with a mechanism to exempt specific Crown entities.

### Issue 13: Managing access to restricted areas

13.1 QLDC supports the proposal to clarify who has the authority to restrict access to certain areas and under what circumstances. Clearer legislative language will reduce ambiguity and enable better coordination among agencies and emergency responders.

13.2 QLDC recommends that the revised legislation acknowledges the role of local authorities in decision-making around managing access. Local councils have critical knowledge of infrastructure, community needs, and potential downstream consequences of providing access to key locations and local assets.

13.3 QLDC supports a combination of options 2, 3 and 4:

- **Option 2** (non-legislative): National guidance and training on managing cordons.
- **Option 3** (secondary legislation): Prescribe the form of identification passes through regulations.
- **Option 4** (legislative): Clarify that access can be restricted to any class or group of persons.

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<sup>5</sup> CDEM Act 2002 s64(2)

- 13.4 The combination of guidance and training, along with prescribed identification forms and clear legislation around restricted access provisions will significantly improve the management of this important operational activity.
- 13.5 QLDC recommends that work also be undertaken to exploring the development of a nationally consistent digital permitting or accreditation system to streamline access for accredited personnel, media, and other essential entities during emergencies.

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

- 14.1 QLDC acknowledges the importance of removing duplication, confusion and inconsistencies around functions and powers of CDEM Groups, Controllers and Recovery Managers.
- 14.2 QLDC therefore supports:
- **Option 2** (legislative): Tidy up existing functions and powers related to CDEM Groups, Controllers, and Recovery Managers.
- 14.3 In the discussion document this is framed as an administrative correction and will not involve changes to the scope and assignment of powers. Should this approach change, more detailed consultation would be required.

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

- 15.1 QLDC supports efforts to modernise the process of declaring a state of emergency or entering a transition period. It is recognised that fast, clear, and legally sound decision-making is critical in times of crisis. However, the current system can be administratively cumbersome and does not always support the speed and clarity needed in escalating emergency situations.
- 15.2 QLDC supports:
- **Option 2** (legislative): Enable authorised persons to use electronic signatures.
- 15.3 This change will enable a more agile, reliable, and modern process for entering both states of emergency and transition periods. QLDC also recommends that NEMA investigate the development of a standardised electronic form for declaring local states of emergency to complement this change in signature format.

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

- 16.1 QLDC supports the continuation of the status quo, where the mayor (or an elected representative of the local authority) and an authorised representative of the CDEM Group (in Otago this is the Chairperson of the regional council) can declare a local state of emergency and issue a transition period notice under the CDEM Act 2002.
- 16.2 The status quo provides a practical, democratically accountable, and well-understood framework for emergency declarations at the local level, which provides balance, accountability and contingency between the two signing parties. QLDC sees no compelling reason to alter this arrangement and supports its continuation.

## GENERAL COMMENTS

- 16.3 QLDC supports the intent to modernise the emergency management system to ensure it is more effective, people-centred, and better aligned with community expectations. However, it is vital that the proposed reforms are implemented in a way that supports, rather than overburdens, local authorities. QLDC also urge NEMA to provide sufficient transition time, funding, and capability-building support to give effect to the proposed changes.
- 16.4 QLDC reiterates the view expressed by Taituarā that the proposals, while well-intentioned, will have significant resourcing implications. A full cost impact assessment should accompany any legislative change. Without adequate central government funding, there is a real risk that councils will be unable to deliver on the proposed new responsibilities.
- 16.5 QLDC supports initiatives to professionalise the emergency management workforce, but notes that the implementation of mandatory competency standards must be proportionate and supported with funding and training, especially for councils that rely on staff undertaking emergency roles alongside their core responsibilities.
- 16.6 The scale and complexity of major emergency events mean that the local government sector will never have the full capacity to meet all response and recovery needs. As such, the sector is heavily reliant on central government to lead a narrative shift that positions emergency management as a 'whole-of-society' responsibility, as detailed in the National Disaster Resilience Strategy<sup>6</sup>. Embedding a message that emphasises proactive emergency preparation and community empowerment is essential to ensuring that families, neighbourhoods, and communities take the necessary steps to support themselves and each other, while councils activate and deliver on their formal emergency management duties. QLDC has proactively invested in this space through its focus on developing its Community Resilience Group network across the district.

## RECOMMENDATIONS

- R1. Support both legislative and non-legislative options to meet diverse community needs. Fund outreach, translation, and accessibility at the local level. (*Options 2, 3 & 4 – Issue 1*)
- R2. Require iwi Māori representation on CDEM Groups. Support iwi roles with funding, partnerships, and kaupapa Māori planning tools. (*Options 2 & 3 – Issue 2*)
- R3. Strengthen community participation. Require CDEM Plans to show how public offers of support will be managed. (*Options 2 & 3 – Issue 3*)
- R4. Extend legal protection and compensation for people and businesses who act in good faith during emergencies. (*Options 2 & 3 – Issue 4*)
- R5. Assign control during emergencies to the most relevant agency (e.g. FENZ for wildfire). Plan and exercise joint scenarios ahead of time. (*Option 2 – Issue 5*)
- R6. Clearly define roles of CDEM Groups vs. local councils. Avoid over-centralisation and maintain local flexibility. Use NEMA guidance (not legislation) to help regions choose suitable governance models for emergency management. (*Option 2 – Issue 6.1 & Option 2 – Issue 6.3*)

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<sup>6</sup> <https://www.civildefence.govt.nz/resources/publications/national-disaster-resilience-strategy/>

- R7. Allow faster plan updates by removing the Order in Council requirement. Provide templates and support from NEMA. *(Option 3 – Issue 7)*
- R8. Allow the CDEM Director to set rules for national standards. Respect local innovation and decision-making. *(Option 3 – Issue 8.1)*
- R9. Give clearer guidance on acceptable hazard risk. Align with climate and land use planning systems and the efforts of local government to build community resilience. *(Option 2 – Issue 9)*
- R10. Develop national guidance for protecting taonga Māori, heritage, and animals. Include protocols and training. *(Option 2 – Issues 10.1 & 10.2)*
- R11. Replace “lifeline utilities” with “critical infrastructure ”and seek to future-proof how services are defined and included. Require detailed business continuity plans for infrastructure. Support voluntary cooperation through guidance, not law. *(Option 3 – Issue 11.1, Option 3 – Issue 11.2 & Option 2 – Issue 11.3)*
- R12. Support the introduction of a minimum legislative standard of business continuity planning for central government agencies. *(Option 4- Issue 12)*
- R13. Clarify who has the authority to restrict access to certain areas and under what circumstances. *(Option 2,3,4- Issue 13)*
- R14. Correct existing functions and powers related to CDEM Groups, Controllers, and Recovery Managers. *(Option 2- Issue 14)*
- R15. Enable electronic signatures for emergency declarations. Create standardised digital forms for faster processes. *(Option 2 – Issue 15)*
- R16. Keep the current system where Mayors and CDEM Groups can declare emergencies.*(Support for status quo – Issue 16)*
- R17. Ensure reforms do not overburden local councils, particularly smaller ones.
- R18. Provide adequate transition time, funding, and capability-building support.
- R19. Undertake a full cost impact assessment before any legislative change.
- R20. Fund and support the implementation of mandatory competency standards, especially for councils with dual-role staff.