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Waimakariri District Council submission on the Emergency Management (No 2) Bill

1. Introduction

- 1.1. The Waimakariri District Council (the Council) thanks the Governance and Administration Select Committee (the Select Committee) for the opportunity to provide a submission on the Emergency Management Bill (No 2) (the Bill).
- 1.2. The Council notes that the Select Committee is calling for submissions on the Bill until 15 February 2026.
- 1.3. We support the general intent of the Bill and what it aims to achieve. However, we note that the scale and pace of change is highly ambitious and relies on a 'matrix' of interrelated reform programmes that need to progress cohesively.

2. Background

- 2.1. The Waimakariri District spans diverse environments, from provincial towns like Rangiora and Kaiapoi to the remote high country of Lees Valley. Of the district's 74,000 residents, 80% live in the east, with around 60% concentrated in Rangiora, Kaiapoi, Woodend/Pegasus, and Oxford. The district also has one of New Zealand's highest numbers of lifestyle blocks, with about 6,000 residents living rurally.
- 2.2. Following the 2010–11 Canterbury earthquakes, working closely with national agencies, iwi partners, and our local communities, we restored critical infrastructure and reestablished essential services swiftly and effectively. The Council maintains strong and recognised emergency response capability in flood mitigation, and vegetation fire management.
- 2.3. Sustained, rapid growth since the earthquakes, along with growth projections highlighting an expected population of 100,000 by 2050 has resulted in the Council having a strong focus on infrastructure investment. Despite pressures from earthquakes and sustained growth, the Council has maintained prudent financial management. Average rates increases over the last 10 years during this growth and recovery period have been 4.8%, and Fitch has affirmed the Council's AA credit rating with a Stable Outlook (compared with ANZ and BNZ at A+). For 2026/27, the proposed average rate increase is 4.91%. Within the overall figure, the general average rate increase for most ratepayers across the district is 2.7 per cent. The Council's recovery leadership and infrastructure management have been recognised by past and present Governments and the Office of the Auditor General.
- 2.4. A significant contributor to our district's success is the way we incorporate local knowledge into planning and regulatory processes. We have consistently seen positive, balanced outcomes when communities are genuinely engaged in consent and plan change processes. This was particularly evident in our recent District Plan Review, where Councillors served on the hearings panel. Their involvement enabled submitters to speak

directly with decision makers who understood the local history, context, and community identity—resulting in decisions that better reflect the realities and aspirations of our district.

- 2.5. The Council and the district community are very experienced in managing the effects of significant disaster events, including the devastating Canterbury earthquake sequence of 2010-12. These earthquakes severely damaged the town of Kaiapoi, the beach communities of Kairaki and The Pines Beach, and impacted the whole district.
- 2.6. Given its low-lying character as part of the Canterbury Plains, the district is frequently subject to significant localised and regional flood events. Ongoing risk is faced by the potential in a very large event for breakouts from river control of the Ashley Rakahuri and Waimakariri alpine fed rivers. The ever-present risk of an Alpine Fault movement also exists.

3. Local Government Reform programme including Emergency Management reform

- 3.1. Although delivered individually, the recent flurry of reforms produces a matrix forward work programme for councils that must progress cohesively to avoid unintended consequences for the sector and the communities they serve.
- 3.2. We emphasise the importance of fully understanding the implementation requirements, sector interdependencies, and the practical implications of the proposed legislative changes. We encourage active collaboration between central and local government staff to build a shared, practical understanding of how the reforms will be delivered and to support effective, coordinated implementation across the sector.
- 3.3. For example, we note the timing and significant workload associated with the Regional Spatial Plan signalled in the Planning Bill. The Spatial Plan is expected to commence this year and will therefore be developed in advance of any new regional reorganisation legislation. This Bill requires councils to have a view on regional reorganisation ahead of the implementation of this programme. This out-of-order sequencing creates additional pressure on councils, and a risk of misalignment in outcomes. It also introduces the real possibility of significant rework of spatial planning documents. This underscores the importance of aligning reform timeframes.
- 3.4. The Council is concerned that no dedicated funding has been identified to support this substantial area of reform, or any recognition of the costs that will be incurred through the transitional period in which rates capping legislation will also potentially apply.
- 3.5. The proposed changes represent a significant undertaking for the local government sector, and adequate resourcing will be essential to manage the interim period and achieve sustainable, long-term outcomes. While the Council supports the intent to improve efficiency, we also recognise that delivering the best reorganisation plan will incur short-term costs - costs that our ratepayers are unlikely to support without corresponding central government investment. This includes significant capability and carefully targeted capacity to locally coordinate and deliver emergency management in response to a wide range of natural hazards and risks, including fire, flood, wind, earthquakes, and tsunamis.

Enabling the proposed emergency management system

- 3.6. To help meet the goals of this adapted system, we consider that councils will need the following:
 - A system that is clear on how the constituent component parts work together.
 - An understanding of the challenges that local authorities face and a willingness to co-design system standards, rules and regulations.

- The ability to continue to provide local solutions for local issues.
 - Support to manage the change proposed by the various reforms as we identify how they can work effectively in practice.
 - The ability to continue to build on relationships with Ngai Tūāhuriri Rūnanga and ensure that we can give meaningful effect to existing partnership arrangements.
- 3.7. As outlined in Section 3 of this submission, our key submission points relate to the following topics:
- Increasing costs for Local Government
 - Locally led versus nationally driven emergency management
 - Addressing previously identified lessons of Emergency Management system failures
 - Effective implementation of legislative changes.
- 3.8. In addition to the Council's key submission points, Table 1 (Appendix 1) provides some suggested improvements to the legislation that we consider will help deliver on the Bill's objectives.

Key submission points

4. Financial implications for Local Government

- 4.1. The Council notes that this Bill would impose additional costs on territorial authorities at a time when Central Government is seeking to improve efficiencies for New Zealand ratepayers (and indeed is currently consulting on proposals to apply a 'rates cap').
- 4.2. These costs include the direct financial burden on Councils to deliver emergency management services once the Bill comes into force. Central Government's Regulatory Impact Statement estimated this cost as an additional \$82.4 million collectively.
- 4.3. Additional indirect costs will arise from changes to how hazard exposure risk is managed under the wider reform programme. Though the Bill makes recovery planning stronger, it places little emphasis on reducing risk. Evidence consistently shows that investing in risk reduction delivers better value than financing recovery costs after disasters.
- 4.4. The Council already follows current best practice of early investment as the most cost-effective approach to disasters for our ratepayers over the medium and long term. To truly strengthen New Zealand's emergency management system, we would advise Central Government to invest in building Councils' capability and capacity in areas the Bill identifies as essential for the safety of our communities.

Direct costs

- 4.5. Some immediate costs to Councils include the replacement of existing Civil Defence branding, funding for community and iwi participation in emergency management, and the renegotiation of MOUs and contracts to reflect the increased expectations placed on essential service providers.
- 4.6. Additional costs will arise as Councils work to meet new minimum industry standards. While the Bill expands both the minimum requirements and the scope of engagement and

planning, it provides limited clarity on sustainable funding mechanisms for Councils beyond existing grants. This is occurring at a time when Local Government is being directed to prioritise core services and maintain affordable rates (through a proposed rates cap).

- 4.7. The Council therefore seeks clarity on how the Government has considered the practical constraints of time, resources, and capacity required to lift the quality of emergency management services for communities. As it currently reads, the Bill would increase local compliance obligations without offering corresponding assurances of adequate funding.
- 4.8. The Council recommends the following:
- Compliance and secondary-legislation powers should be supported by proportionality and a graduated approach to enforcement, with appropriate cost-impact safeguards to prevent unfunded mandates being placed on Local Government
 - An affordability principle should be included, providing for co-funding (between central and local government) of new statutory duties (such as planning, meeting minimum standards, and engagement), linked to NEMA-administered capability grants and clear, measurable outcomes
 - The Bill should provide for a dedicated emergency management capability grant for local authorities, tied to demonstrated achievement of minimum standards, to ensure Councils can meet the Bill's requirements while maintaining minimal rate increases.

Indirect Costs

- 4.9. While the Bill strengthens provisions for recovery planning, it provides limited emphasis on risk reduction. This is at odds with established best practice, which consistently demonstrates that investing in reduction is more cost effective than meeting ever increasing recovery costs. This gap is especially concerning in the context of the wider reform programme, where statutory requirements to reduce exposure and vulnerability to natural hazards are at risk of being diminished.
- 4.10. Examples include:
- *Resource Management Act reform*: The introduction of nationally standardised zones and combined regional plans could override local hazard nuances, unless explicitly hazard aligned. Fast-track and long-duration consents (potentially extending up to 35 years) combined with one-year decision timeframes may entrench vulnerable land use-patterns, more quickly than emergency management risk reduction measures can counter. Emergency management 'clarity' will be of limited value if spatial planning decisions continue to increase exposure that will later require costly intervention.
 - *Earthquake Prone Buildings reform*: Removing large cohorts of buildings from mandatory strengthening requirements shifts life-safety externalities onto communities and increases future response and recovery budgets. While ratepayers may see short-term savings from reduced strengthening obligations, they are likely to face significantly higher costs following an event. Legal commentary also anticipates contractual ambiguity where %NBS references are removed, which may result in widespread legacy-clause conflicts across leases, heritage covenants, and approval processes, impacting on Council workload.
- 4.11. Ultimately, these proposed changes may result in higher long-term costs and an increased need for response for communities when natural hazards occur.

- 4.12. The Council is also concerned about overlapping expectations across the various reform programmes. Without alignment between this Bill and the Adaptation Framework, Councils may face dual expectations, parallel engagement requirements, and competing priorities between adaptation planning and emergency management readiness and response.
- 4.13. The Council would like to see the Select Committee consider the wider reform programme and the potential implications of implementing the new emergency management arrangements. In particular, the Council believes the Committee should seek to minimise duplication and ensure alignment across related legislative frameworks.
- 4.14. The Council recommends the following:
- That the Emergency Management Plan is established as a single, integrated instrument that can be incorporated by reference into regional planning under the new Planning Act, avoiding parallel consultation processes
 - That review cycles across emergency management plans, adaptation plans, and spatial planning instruments be aligned (e.g. on a six-year cycle) with consolidated engagement processes and shared evidence bases, such as hazard and flood mapping, to reduce duplicated costs for Councils and communities
 - That NEMA be required to issue national direction templates that are aligned with hazard and risk policy settings within the Resource Management Act replacement framework, to ensure consistency across the sector and support efficient implementation.
- 4.15. Requiring each Council to develop a coordinated approach to the broad suite of reforms currently underway is likely to increase short-term inefficiencies and, over time, may result in a fragmented approach that does not fully align with Central Government objectives.

5. Locally led versus nationally driven emergency management

- 5.1. The Council supports the introduction of standards and rules that promote economies of scale and enhance greater interoperability over time. However, this approach must be balanced with the strengths of a locally led emergency management system to ensure that outcomes remain appropriate and responsive to the needs of our communities.
- 5.2. The Council notes that following adverse weather events, lifestyle block owners sit in a gap between urban emergency management processes and rural processes supported by MPI. They are often not eligible for MPI recovery assistance. This can result in a significant financial burden for the lifestyle block owners as they may have to meet the costs of re-fencing, obtaining stock feed and additional veterinary support out of pocket. We raise this issue again for consistency, as we have submitted on this issue in previous consultations. We request this issue is considered when designing the new emergency management system.

Retaining local context for effective response and recovery

- 5.3. The Council has consistently championed the importance of enabling local solutions to address local challenges. The way the Bill is currently drafted risks constraining this ability. When developing rules and standards at a Central Government level, an understanding of the practical challenges faced by local authorities and a willingness to co-design solutions is critical. Early engagement with Councils, focused on the rationale for proposed changes and informed by established good practice, will be essential to ensuring that the resulting system rules are both effective and appropriate.

Clarifying local and regional responsibilities

- 5.4. As currently drafted in the Bill, 'Subpart 2 - Regional role-holders' outlines information for local authorities (inclusive of both Regional Councils and Territorial Authorities), as well as regional, district, and local roles for emergency response and recovery. The attempt to clarify roles and responsibilities by providing more detail while conflating the terms 'local' and 'regional' and using them interchangeably only serves to reduce clarity on who is responsible for what.
- 5.5. The Council notes that the current process where in practice only the Minister can declare a state of emergency in the period following a local election, but before elected representatives have been sworn is cumbersome. We request that DIA looks at what other approaches are available for 'caretaker' decision making so that state of emergency declarations do not have to be referred to the Minister.
- 5.6. The Council suggests that Central Government consider a more efficient structure, particularly in light of potential future shifts for the Local Government sector. In the Council's opinion, a more logical starting point would be to define functions required for effective emergency management at the territorial authority level. This could then be followed by outlining the value added by regional scale services through Emergency Management Committees. Finally, the structure should set out NEMA's role in providing oversight and system level direction.
- 5.7. Structuring the Bill in this way would more clearly define the responsibilities of territorial authorities, demonstrate how regional collaboration can support economies of scale, and reinforce the national mandate to ensure system effectiveness. It would also strengthen the commitment to a locally led emergency management approach.
- 5.8. In addition, Council feels that by appointing chief executives as a District Controller the Bill increases the risk of failing our communities during emergencies. Through the proposed section 43, chief executives are responsible for ensuring Councils continue to carry out their role, including the functions described under section 42. The intent of the Controller function is to provide more focussed attention on the immediate safety and needs of our communities. It would be challenging to meet the demands of both roles during emergency situations.
- 5.9. The Council recommends the following:
 - Emergency Management Committees should be formally identified as key stakeholders in the development of planning standards and rules (s101 and s213 of the Bill).
 - District Controllers and Recovery Managers should retain equivalent power and authority to direct response activities within their areas of responsibility when a Regional Controller is not required.
 - The National Emergency Management Plan should be required to clearly specify lead agency responsibilities. This would support improved sector preparedness and reduce uncertainty during emerging events.
 - The Bill should more clearly delineate between local and regional role-holders and their respective functions. This could include dividing 'local authority' into 'territorial authority' and 'regional council' where applicable. The separation would help to:
 - Clarify the functions a Regional Council performs as a 'local authority' (e.g. riverine flood monitoring) versus its functions as the administrative body for a multimember Emergency Management Committee (such as approving the

appointment of a Local/ District controller by a Council Chief Executive).

- Appropriately assign accountability between regional-level statutory planning (e.g. through an Emergency Management Committee) and Council-level operational planning, ensuring that response and recovery arrangements are clearly articulated at the level where delivery occurs.
- Chief executives should not be identified as candidates for the controller role in the first instance.

6. Addressing previously identified lessons in Emergency Management system failures

- 6.1. The Council acknowledges and appreciates improvements to system settings that support readiness. In particular, clearer emergency management accountabilities for local authority Chief Executives, the introduction of minimum sector standards, strengthened expectations for essential service preparedness, and the enhanced recognition of community and iwi roles in emergency management.
- 6.2. However, considering recent reviews into the emergency management system and the Government's Roadmap to strengthen emergency management, the Council considers that the Bill still lacks sufficient clarity regarding NEMA's role in enabling a more interoperable system in practice. Specifically:
 - The responsibility to address ongoing issues with shared situational awareness and communications during complex events. The Common Operating Picture software platform is currently called out as a priority project under the Roadmap, but the Bill does not set system levers that allow NEMA to lead this type of work as a matter of course.
 - Levers that could prevent repetition of known system failures, including the notable absence of a coordinated national lessons-management system. Without these it is unclear how future Inquiries, compliance orders and section 18 will be implemented in a coordinated and strategic manner to enable efficient improvement of the sector over time.
 - Coordinate the development of a clear responsibilities matrix to build a shared understanding of each lead agencies' role across the 4Rs at national, regional and local levels. Including information on the form and function of central government agencies in events of regional/ national significance would significantly strengthen pre-event planning and enable more efficient decision-making, reducing ambiguity during critical periods.
- 6.3. Additionally, the responsibilities for coordination of resources and implementation of recovery activities after a state of emergency or transition period remain unclear. Although this Council restored critical infrastructure and reestablished essential services swiftly and effectively, this lack of clarity has affected recoveries for other communities in the past and will do so again. Clearly defining these post-transition roles and responsibilities is essential for efficient and effective delivery of recovery activities.
- 6.4. Linked to a more coherent recovery process, Council would suggest that some consideration be given to lifestyle block owners. Investment in readiness and reduction for this group could significantly reduce costs post-event, both for the individuals and our ratepayers.
- 6.5. There are two other considerations that would enable more effective resilience planning and greater role clarity for the sector in future. The first relates to needing greater alignment

between the Bill and emergency services role titles and the second relates to the current conflation between essential infrastructure providers and essential service providers.

6.6. The Council recommends the following:

- That the development of national systems and tools be explicitly included as a function of the Director General of Emergency Management
- That the development of a coordinated lessons-management approach be identified as a topic on which the Director General may issue guidelines, codes or technical standards on
- That to address the proposed requirement of the National Emergency Management Plan to name lead agencies, NEMA develop a responsibilities matrix to clarify decision-making authorities and coordination obligations for local authorities, regional CDEM Groups, essential service providers and central agencies. It could be as simple as a matrix that documents roles and responsibilities across each of the 4Rs at the national, regional and local levels. That Emergency Management naming conventions be aligned with key sector agencies
- That the Bill clarify recovery responsibilities and include a mechanism to enable transfer of post-transition responsibilities where appropriate.
- That the Bill clarifies the expectation that essential infrastructure providers should have some role in regional and local emergency management.
- That the Bill consistently distinguishes between essential infrastructure providers and essential service providers.

7. Effective implementation of legislative changes

7.1. The truncated process used to introduce the current suite of reforms has meant limited consultation with local government on the specifics of each Bill. Implementation of the Bill will require significant resourcing of people, funding and time. We ask that the Central Government does not underestimate this. The Council also notes existing initiatives to implement changes to the emergency management system.

7.2. The Council recommends the following:

- NEMA could publish an Emergency Management System Improvement Programme/ Emergency Management Sector Operational Systems-to-Bill implementation crosswalk, outlining which Bill obligations will be delivered through Director-General guidance, Ministerial planning standards, national plans, and rules. This would enable local government to more accurately assess cost, capability, and compliance implications
- That the Bill's staggered commencement, including delayed commencement for key operational and compliance provisions, be supported by clear transition guidance, adequate lead-in time, and appropriate resourcing to avoid uneven readiness across the system
- That Central Government carefully consider the sequencing of reforms to minimise the impact on Council resources, and explore opportunities to share costs with Local Government for any new functions being introduced
- That Central Government engages with Taituarā and Emergency Management Committees to develop a coordinated plan and process for implementation of these amendments.

8. Summary of position and recommendations

8.1. The Council supports the general intent of the *Emergency Management Bill (No2)*. However, to truly strengthen New Zealand's emergency management system we request Central Government allows more opportunity for:

- Local voices to inform and enable effective implementation both throughout the reform and future emergency management related matters
- Sufficient early investment in building council capability and capacity to reduce ever greater costs for ratepayers and taxpayers after the next event
- Better integration with other legislation to ensure a more coherent and efficient approach to managing hazard risks facing our communities
- Further consideration of the timing and sequencing of the suite of reforms that are in process

8.2. It is the Council's preference that the progression of the *Emergency Management Bill (No2)* beyond this phase of consultation takes into consideration the key submission points made by the Council in this submission, including those outlined in Appendix 1.

Our contact for service and questions is Lexie Mealings, Policy Analyst, Strategy and Business Unit, Waimakariri District Council – Lexie.mealings@wmk.govt.nz

The Council would like to speak in support of its submission.

Yours faithfully



Dan Gordon
Mayor
Waimakariri District Council



Jeff Millward
Chief Executive
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Appendix 1

Table 1 – Waimakariri District Council position on key amendments in the Emergency Management Bill No2

Clause no. and short description	Council position	Issue	Implications	Suggested Change
Topic – Locally led emergency management				
<p>s101 Preparation of regional emergency management planning standards</p> <p>s213 Procedure for making rules</p>	Support with alterations	In its current draft, the Bill risks constraining Council’s ability to tailor solutions that effectively address local challenges.	This undermines the narrative of a locally led approach for NZ emergency management and could result in ineffective implementation in practice.	<p>The Council suggests the following addition under s101(2):</p> <ul style="list-style-type: none"> Consult with Emergency Management Committees. <p>The Council suggests the following additions under s213(1)(d):</p> <ul style="list-style-type: none"> Advice provided by Emergency Management Committees Obligations placed on local authorities, under any other legislation that requires continuity of service.
<p>s57 Role of District Controllers</p>	Support with alterations	The current Clause only states that a District Coordinator must coordinate during a state of emergency, rather than coordinate <i>and</i> direct.	This runs counter to the locally led approach and increases confusion where a Regional Controller in the Coordination Centre can direct, and the District Controller in the Emergency Operations Centre can only coordinate.	<p>The Council suggests the following alteration under s57(2):</p> <ul style="list-style-type: none"> During a state of emergency that covers the district for which the District Controller is appointed, the District Controller must [direct and] co-ordinate the use of the personnel, material, information, and other resources made available for the purposes of this Act.
<p>s170 Power to require information</p>	Support with alterations	Information-gathering powers should be consistently available to Local Controllers (with the unitary context) where they are directed to exercise controller powers.	A lack of these powers could lead to operational delay and uncertainty during a response.	<p>The Council suggests the following additions under ss 170(1) and 121:</p> <ul style="list-style-type: none"> Local Controller
<p>s69 Role of lead agencies</p>	Support with alterations	In its current draft, the Bill risks impeding effective response and recovery efforts.	Not clarifying what ‘response to’ entails means there will be greater confusion around how civil defence emergency management services are best integrated during a response.	<p>The Council suggests clarifying what is meant by response and how responsibilities will be attributed to allow for provision of general emergency services.</p> <p>The Council suggests the development of a responsibilities matrix (see advice on s82) to clarify this further. For example, there are multiple agencies with roles around Flooding.</p>
<p>S82 National emergency management plan</p>	Support with alterations	Multiple reviews into the Emergency Management system have identified that unclear roles and responsibilities can impede effective response and recovery efforts. While the Bill provides some additional detail on responsibilities, it does not establish clear expectations for how these changes should be implemented in practice to ensure their effectiveness.	<p>The National emergency management plan could incorporate a responsibilities matrix that clearly outlines decision-making authorities and coordination obligations for local authorities, regional CDEM Groups, lifeline utilities/water organisations, and central agencies.</p> <p>Setting the matrix up to clarify expectations across the 4 Rs and for the National, regional and local levels would help the sector plan for interoperability and avoid uncertainty during emerging events.</p> <p>Development of this matrix should draw on the roles pillar of the Adaptation Framework and ensure appropriate cross referencing to resource management planning functions.</p>	<p>The Council suggests the following addition under s82(2):</p> <ul style="list-style-type: none"> The responsibilities of lead agency across reduction, readiness, response and recovery.
<p>s5 Interpretation</p> <p>s42</p>	Support with alterations	‘Local Authority’ has been given the same meaning as prescribed under s5(1) of the <i>Local Government Act 2002</i> , which refers to both Regional Councils and Territorial Authorities. Not having separate	<p>The separation would help:</p> <ul style="list-style-type: none"> Delineate the function of a regional council as a local authority (e.g. riverine flood monitoring) from its functions as the administrative body for 	<p>The Council suggests the following additions under s5:</p> <ul style="list-style-type: none"> Include separate definitions for ‘Territorial Authority’ and ‘Regional Authority’.

Clause no. and short description	Council position	Issue	Implications	Suggested Change
Role of local authority members of multi-member Emergency Management Committees		definitions for 'Territorial Authority' and 'Regional Council' creates overlap in responsibilities for the same area.	<p>a multimember EMC (e.g. approving the appointment of a Local/District controller by a council CE).</p> <ul style="list-style-type: none"> Allocate accountability between regional statutory planning (EMC) and council-level (local) operational planning, to ensure response and recovery arrangements are explicit at the level where delivery occurs. 	<p>The Council suggests the following under s42:</p> <ul style="list-style-type: none"> Clarifying that Section 42 is only applicable to Territorial Authorities.
s52 & s61 Appointment of District Controllers/Recovery Managers for multi-member Emergency Management Committees	Support with alterations	The Emergency Management Committee is not involved in the appointment of District Controllers/ Recovery Managers where the candidate is not the chief executive of a territorial authority.	This undermines the function of the Emergency Management Committee under s27 (b). It also detracts from the chief executives responsibilities to ensure continuity of service under s43.	The Council suggests that Select Committee consider including a role for Emergency management committee to approve the appointment of any District Controller/ Recovery Manager.
s52 & s61 Appointment of District Controllers/Recovery Managers for multi-member Emergency Management Committees	Support with alterations	The current wording suggests there is only one District Controller appointed for each territorial authority	This undermines a Council's ability to increase capacity by having several District Controllers and Recovery Managers appointed on a rotation basis	<p>The Council suggests replacing (2) and (3) under s52 with:</p> <ul style="list-style-type: none"> The chief executive must appoint at least 1 suitably qualified and experienced person to be a District Controller for the district <p>The Council suggests the following replacing (2) and (3) under s61 with:</p> <ul style="list-style-type: none"> The chief executive of the territorial authority must appoint at least 1 suitably qualified and experienced person to be a District Recovery Manager for the district.
Topic – Supporting effective systems settings				
s14 Functions of Director-General of Emergency Management	Support with alterations	In its current draft, the Bill does not provide sufficient clarity around NEMA's responsibility to address continued failures in shared situational awareness and communications during complex events.	<p>Including the suggested change would support NEMA to:</p> <ul style="list-style-type: none"> Prioritise the development of a national common operating picture to support coordinated response to emergencies across all communities. Maintain a national interoperability framework for warnings, situational awareness, and welfare registration. 	<p>The Council suggests the following addition under s14:</p> <ul style="list-style-type: none"> Develop, in consultation with the relevant persons and organisations that have responsibilities under this Act, any systems and tools that may be required for the purposes of this Act.
s15 Powers of Director-General	Support with alterations	The Bill is silent on levers that could reduce repetition of known failures due to the lack of a national lessons management system.	Including the suggested change would support NEMA to develop a national lessons management framework.	<p>The Council suggests the following addition under s15(4):</p> <ul style="list-style-type: none"> The development of coordinated lessons management.
s14 Functions of Director-General of Emergency Management	Support with alterations	The Bill lacks clarity on system settings to enable effective transition back into business as usual where national government may wish to support local or regional communities.	Both in transition and after transition, it is unclear how recovery coordination is achieved in any practical sense across government agencies. If this responsibility is given to Recovery Managers and Council Chief Executives, it must come with the resources and support to ensure it can be implemented	<p>The Council suggests the following addition under s14 (h):</p> <ul style="list-style-type: none"> During a state of local emergency or a local transition period, support the direction and control for the purposes of this Act the resources available for emergency management.
s51-58	Note	Some discrepancy between the Bill and interagency (NZ Police, FENZ, St John) operational doctrine (including common incident management practice).	Aligning naming conventions across sector agencies would reduce confusion during multi-agency events.	Controller role naming and descriptions should be aligned with interagency (NZ Police, FENZ, St Johns) operational doctrine.

Clause no. and short description	Council position	Issue	Implications	Suggested Change
s74 Duties of essential infrastructure providers	Support with alterations	The Bill should clarify expectations for Essential Infrastructure Providers participation in regional planning and local coordination, including information-sharing and resourcing implications.	Failure to set this expectation now will hamper effective readiness across the emergency management system.	The Council suggests the following addition under s74(e) : <ul style="list-style-type: none"> Participate in regional emergency management planning.
s5 Interpretation	Support with alterations	The Bill conflates essential infrastructure providers and essential service providers.	Distinguishing between the two would ensure system settings that enable more effective resilience planning and greater role clarity for the sector in future.	The Councils suggests reviewing the Bill to ensure the clauses and schedule relating to essential infrastructure providers align with the definition provided under s7s5.

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