



**Ministry of Civil Defence
& Emergency Management**

Te Rākau Whakamarumarū

ANALYSIS OF SUBMISSIONS

Revised National Civil Defence Emergency Management Plan

JUNE 2015

*Resilient New Zealand
A Aotearoa manahau*

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1. Background

On 23 May 2014, the Minister of Civil Defence invited public submissions on the draft revised *National Civil Defence Emergency Management Plan* (the revised National CDEM Plan). The consultation period ran for 40 working days, closing at 5pm, Friday 25 July 2014.

Forty-four submissions were received from a broad range of submitters, including central and local government agencies, crown entities, non-government organisations, lifeline utilities, universities, science and research organisations, and members of the public.

All feedback was taken into consideration by the Ministry of Civil Defence & Emergency Management and relevant partner agencies during the final development of the revised National CDEM Plan. This report *highlights* the key themes that emerged from the submissions analysis process.

Why is the National Civil Defence Emergency Management Plan being reviewed?

The first National Civil Defence Emergency Management Plan 2005 came into force on 1 July 2006. Under section 46 of the Civil Defence Emergency Management Act 2002 (the CDEM Act), the Minister of Civil Defence is required to review the National CDEM Plan every five years. This is to ensure that the arrangements in the National CDEM Plan remain current and are well understood by the agencies responsible for their delivery.

A review of the National CDEM Plan 2005 commenced in 2010. Its aim was to analyse whether the Plan was achieving its purpose. Overall, the review concluded that the National CDEM Plan was fundamentally sound. However, a range of amendments were identified for improvements to the structure and content of the Plan.

Following the Christchurch earthquake on 22 February 2011, the review of the National CDEM Plan was deferred to enable agencies to concentrate on the earthquake response and to enable the Government to incorporate lessons learned from post-response reviews.

Reviews that have informed the development of the revised National CDEM Plan include:

- the independent Review of the CDEM Response to the 22 February 2011 Christchurch Earthquake Report (October 2012),
- the Review of Emergency Welfare Arrangements Report (December 2012),
- the report of the Canterbury Earthquakes Royal Commission of Inquiry (June, October and November 2012).

Structure of this report

This report comments on the submissions received with reference to the separate parts of the revised National CDEM Plan, highlighting major themes.

2. Summary of submissions and amendments

Forty-four submissions (containing over 700 individual comments) were made during the consultation on the revised National CDEM Plan, from a wide variety of groups and individuals. As expected the bulk of the submissions came from the CDEM sector - CDEM Groups provided approximately half of the feedback on the revised National CDEM Plan. Submissions were received as follows:

Sector	Number of submissions
CDEM Groups and local government	16
Central government agencies	6
Crown entities	6
Non-government organisations (NGOs)	6
Lifeline utility companies	3
Universities/academic affiliations	2
Professional or industry association or body	2
Other – including individuals	3

General comments on the revised National CDEM Plan

Overall, the comments received from submissions were positive and constructive, with many submitters noting or commending the improvements made to the Plan. CDEM Groups were the most vocal in support of the revised National CDEM Plan:

“It is the nature of submissions such as this that comments will focus on areas where we disagree or would prefer to do it differently, but I want to stress that the majority of the revised National Plan makes very good sense and has been well updated based on recent significant emergencies.”

“The revision goes a long way to making the National Civil Defence Emergency Management Plan a more concise plan that more clearly identifies objectives, roles and responsibilities for the groups and agencies with CDEM functions before, during and after a national emergency”.

Most submitters made considered and articulate comments about the proposals to amend the Plan. These were gratefully received, and carefully considered by the Ministry and, where applicable, the agencies the comments affected. A number of recommendations for further amendments, both of a minor and major nature, were proposed in submissions, and they are summarised in this document.

Minor amendments

Minor amendments proposed through submission feedback, included:

- correcting grammatical and typographical errors
- improving the clarity and meaning of some sentences and terms
- minor re-wording of some clauses.

Generally, suggestions for minor amendments were agreed and accommodated. A number were rejected because they promoted incorrect terminology that was inconsistent with the CDEM Act or legislative drafting practices.

Major amendments

Approximately one third of submissions proposed substantial amendments to the revised National CDEM Plan. These included proposals for:

- clear linkages to be established between national arrangements and regional and local arrangements (e.g. in relation to lifeline utilities and welfare services)
- further refinement and development of existing arrangements, particularly in the Welfare Services section of the Plan (specifically in relation to the inquiry, care and protection of children and young people, shelter and accommodation and animal welfare sub-functions) and the Emergency Services section
- greater recognition in the Plan for culturally and linguistically diverse communities
- further development of the risk reduction and recovery sections; and
- changes to the overall structure of the Plan.

3. Introduction, purpose, and objectives

CDEM planning is essential if the impacts of emergencies on people and communities are to be managed and reduced. This section provides analysis of the feedback provided on the 'Introduction' and 'Purpose and objectives' parts of the revised National CDEM Plan which outline the status and provides an interpretation of key terms as well as the purpose, audience, scope and objectives of the revised National CDEM Plan. It also provides an overview of the Goals of the National CDEM Strategy and describes how the revised National CDEM Plan is designed to meet those goals.

3.1 General feedback and themes on 'Introduction'

Nine submissions containing 20 comments were received on the 'Introduction' part of the revised National CDEM Plan:

Submitter	Number of submissions
CDEM Groups and local government	3
Central government	1
Crown entity	3
University/academic affiliation	2

Overall, the feedback received on this Part was minor in nature. Submitters sought to clarify the definitions of terms or recommended further acronyms. Examples included adding a definition for Urban Search & Rescue and Police, and re-defining the meaning of DHB.

Almost all of the recommendations in this Part were accepted. A few were rejected because submitters requested wording that broadened the scope of the revised National CDEM Plan beyond its legislative remit, or proposed terms that were inconsistent with the CDEM Act.

3.1 General feedback and themes on 'Purpose and objectives'

Fourteen submissions containing 48 comments were received on the 'Purpose and objectives' part of the revised National CDEM Plan:

Submitter	Number of submissions
CDEM Groups and local government	8
Crown entity	3
Non-government organisations (NGOs)	1
University/academic affiliation	1
Other	1

The majority of comments (29) were focussed upon two major themes:

- clarity around the National CDEM Strategy (the Strategy) and its relationship with the Plan
- the scope and purpose of the revised National CDEM Plan in relation to the 4Rs (reduction, readiness, response, recovery).

3.1.1 The National CDEM Strategy

The majority of submitters that commented on the clauses pertaining to the *National CDEM Strategy* (the Strategy) and its relationship with the revised National CDEM Plan argued that, by removing seemingly superfluous information to simplify the clauses, the Plan had become less clear. In line with these submissions, the original wording of the 2005 Plan has been reinstated.

Some submitters requested changes to the goals of the Strategy. These were not considered as they were outside the scope of the Plan review. Further, a review of the Strategy is currently being undertaken by MCDEM; submitters comments about the Strategy's goals will be considered during that process.

3.1.2 The scope and purpose of the Plan in relation to the 4Rs

The second theme that emerged from submissions about Part 2 is reflective of a broader issue: the scope and purpose of the revised National CDEM Plan in relation to the 4Rs. Comments included:

“The purpose of the Plan should encompass the 4Rs, not just response and recovery”.

“While understanding that this Plan has as its focus response arrangements for national scale emergencies, there are some mixed messages in the scope, purpose and audience about the relative importance of the other ‘R’s and in particular Reduction”.

“The CDEM Act is quite explicit in its expectation that the National CDEM Plan provide for the comprehensive emergency management necessary at the national level, in a considerably more holistic sense than the draft Plan provides for...”

The Ministry agreed that there was merit in submitters' comments that the purpose and scope clauses of the revised National CDEM Plan were narrowly defined and potentially not representative of the 4Rs as a whole. The Project Team considered that the purpose of the revised National CDEM Plan still reflected the requirements of the CDEM Act but agreed amendments could be made to ensure that the 4Rs are acknowledged as being of equal importance in emergency management.

Similarly, the Ministry acknowledged that the scope of the revised National CDEM Plan required some refinement to ensure it clearly encompassed each of the 4Rs. Prescriptive wording about the scope of the revised National CDEM Plan was removed to ensure that the Plan applied to any emergency requiring CDEM at a national level.

4. Hazards and risks & management of emergencies

The revised National CDEM Plan identifies the hazards and risks to be managed at the national-level and the CDEM necessary to manage them, with regards to both lead and support agencies. This section provides analysis of the feedback provided on the 'Hazards and risks' and 'Management of emergencies' parts of the revised National CDEM Plan.

4.1 General feedback and themes on 'hazards and risks', 'management of emergencies'

Thirty-nine comments across 14 submissions were received about the 'Hazards and risks' and 'Management of emergencies' parts of the revised National CDEM Plan as follows:

Submitter	Number of submissions
CDEM Groups and local government	8
Crown entity	3
Non-government organisations (NGOs)	1
Lifeline utility company	1
Other	1

The majority of comments were focussed on three themes:

- the inclusion of new hazards and risks to be managed at the national level
- prioritisation and assessment of hazards and risks at the national level
- roles and responsibilities of lead and support agencies.

4.1.1 Inclusion of new hazards and risks

The revised National CDEM Plan states the hazards and risks, either singularly or in combination, that have the potential to cause emergencies that may require co-ordination or management at the national level. Eight comments addressed those hazards excluded from this list, including:

- space-orientating
- erosion, coastal and inland
- climate change
- wild fires
- infrastructure failure (money supply)
- expansion of pre-existing food safety incidents
- human modification of the natural environment.

The revised National CDEM Plan adopts an all-hazards approach, including reference to, and detail about, the 17 classes of hazards that are outlined in the *National Hazardscape Report*.

The Ministry assessed each new hazard proposed for inclusion in the revised National CDEM Plan and agreed to include new clauses on climate change (and its propensity to exacerbate the likelihood of a range of hazards), and wild fires (given this is captured in the *National Hazardscape Report*).

The remaining hazards recommended by submitters for inclusion in the revised National CDEM Plan were rejected, as the Ministry deemed the hazards to be:

- out of scope (not covered in the *National Hazardscape Report*)
- too small in likelihood and/or too uncertain as to scale or location of impacts to address directly within the five-year life cycle of the Plan
- already adequately covered in the revised National CDEM Plan as impacts to be managed for other hazards and risks (e.g. a proposal to add ‘inland erosion’ was rejected as it is covered as an impact to be managed for landslide, rainfall and flood events).

The Ministry noted that expanded information about hazards could be included in the revised Guide to the National Civil Defence Emergency Management Plan (Guide).

4.1.2 Prioritisation and assessment of hazards and risks at the national level

While almost all submissions on the ‘Hazards and risks’ part of the revised National CDEM Plan expressed support for the inclusion of greater detail about hazards than in the previous Plan, three submissions raised concerns that the section did not go far enough. The submitters proposed:

- identification of priorities from a national perspective on the management of hazards
- further clarity on the national assessment of hazards
- central government ownership of the hazard area.

The Ministry noted that the collaborative, cross-agency process, that has been used to develop the revised National CDEM Plan, with MCDEM as the facilitator, ensures that the revised National CDEM Plan has a national perspective but also acknowledges that each agency has its own obligations under legislation to deal with hazards, risks and their consequences.

While the identification of national priorities for the management of hazards, and/or the national assessment of these hazards may not be carried out as a singular process at the national level, the priorities are overseen at a national level via the National Security System. The National Security System is supported by long-term work programmes across Ministerial portfolios and agencies (e.g. Resource Management Act reform), and addresses immediate threats (e.g. Ebola monitoring).

The Ministry acknowledged the strong message from submitters in support of a single national risk assessment, but considered that while the revised National CDEM Plan identifies the national hazards that may result in emergencies it is not the appropriate medium for an all-of-government national risk assessment.¹

¹ Note: the recurring theme on central government ownership in the area of reduction will be explored further in 6.1 of this document.

4.1.3 Roles and responsibilities of lead and support agencies

The revised National CDEM Plan contains a more comprehensive outline of the New Zealand Government's crisis management arrangements, including further detail about the ODESC system (the system of domestic and external security co-ordination), and roles for lead and support agencies, the Director and National, Group and Local Controllers.

Four submitters expressed concerns about the ability of support agencies to develop and maintain the capacity and capability to fulfil their roles in support of lead agencies. The Ministry agreed with these submissions and amended the revised National CDEM Plan to enable agencies to outsource these roles to meet their obligations under the Plan.

One submitter raised a concern about the clarity of the roles and responsibilities of the Director and the National Controller, particularly around the potential for the National Controller to be forward deployed during a state of national emergency. To address this concern, the revised National CDEM Plan has been amended to include information about the forward deployment of the National Controller, in line with the recommendations of the *Review of the Civil Defence Emergency Management Response to the 22 February Christchurch Earthquake*. To clarify responsibilities a new clause (17(5)) has been added to the Plan that states: *"If the National Controller or resources are deployed forward, there must be clear delineation of functions and responsibilities between the forward elements and those retained in the NCMC"*.

5. Roles and responsibilities

The CDEM Act and the revised National CDEM Plan set out the roles and responsibilities of central government, CDEM Groups and agencies (including lifeline utilities, emergency services and non-government organisations) across the 4Rs. The acceptance of these arrangements by both public and private sector organisations is a key element in CDEM planning.

Part 5, of the revised National CDEM Plan (Roles and responsibilities) outlines these arrangements for MCDEM, CDEM Groups, Clusters, Emergency Services, Health Services, the NZ Defence Force, Lifeline Utilities, and Welfare Services. This section provides an outline of the feedback provided on the Roles and responsibilities part of the revised National CDEM Plan.

5.1 General feedback and themes on ‘Roles and responsibilities’

Over half of all submission comments received on the revised National CDEM Plan were about Part 5, Roles and responsibilities. In total, 39 submissions containing 358 comments were received on this Part. The majority of comments (218) were made by CDEM Groups. Submissions were received as follows:

Submitter	Number of submissions
CDEM Groups and local government	15
Central government	5
Crown entity	5
Non-government organisations (NGOs)	6
Lifeline utility company	3
University/academic affiliation	2
Other	3

Most submissions sought to further clarify, or proposed the redevelopment of, arrangements. Some government agencies sought to make adjustments to their own arrangements, especially those in the Welfare Services section. Examples of proposals included:

- redevelopment of the New Zealand Police and New Zealand Fire Service arrangements within the Emergency Services section, to capture advancements in CDEM and best practice
- replacement of outdated terminology under the Needs Assessment Welfare Services sub-function
- redevelopment of the Registration and Inquiry Welfare Services sub-functions, to mitigate sector confusion on agency responsibilities
- clarification and refinement of the Shelter and Accommodation Welfare Services sub-function, to reflect the complex agency interdependencies
- re-development of the Animal Welfare Services sub-function, to ensure the arrangements between the responsible and support agencies are clearly defined.

All amendments to the arrangements within the Welfare Services section requested by responsible and support agencies were reviewed and agreed by the Ministry and the agencies involved after which the responsible and support agencies redrafted and approved the amendments to arrangements. The substantive themes that emerged from submissions included:

- the structure of the Roles and responsibilities part of the Plan
- MCDEM's mandate to provide overarching CDEM leadership and the provision of welfare services
- CDEM Groups' role in the delivery of welfare services, particularly in relation to the role of the Group Welfare Manager.

5.1.1 Structure of the Roles and responsibilities part

The revised National CDEM Plan is divided into a number of parts, with roles and responsibilities separately articulated from the 4Rs. Four submitters considered that the Roles and responsibilities part of the revised National CDEM Plan largely captured the response arrangements of agencies at the national and regional level, rather than across the 4Rs. As such, the submitters proposed to cross-reference the various Parts, or amalgamate the arrangements to sit across the 4Rs.

“Re-writing and combining Part [5] and [8] of the proposed plan as the Response Part with all content relating to the other 3Rs transferring to their own separate Parts would result in a much clearer overall Plan”.

“The Plan provides similar information in two different ways – one organised by organisation (Part [5] Roles and Responsibilities), and one organised by CDEM function (Part [6] Reduction, Part [7] Readiness, Part [8] Response and Part [9] Recovery). To make this structure more user-friendly, we suggest additional cross-references...”

The Ministry agreed that there was value in restructuring the revised National CDEM Plan to provide further clarity to the sector about agencies arrangements under each of the 4Rs. However, not all agencies with arrangements under the Roles and responsibilities part of the revised National CDEM Plan agreed with this position. Government agencies with roles and responsibilities under the Welfare Services section were particular advocates for the current format. These agencies advised MCDEM that roles and interdependencies within sub-functions and between sub-functions were better understood and identifiable when grouped together within one part.

Given the divergent opinion across the sector, the Ministry compromised with a new clause cross-referencing Part 5 (Roles and responsibilities) with Parts 6-9 (Reduction, Readiness, Response and Recovery) of the revised National CDEM Plan. Further, the Project Team agreed to investigate the development of a dynamic electronic version of the revised National CDEM Plan within the revised *Guide to the National CDEM Plan*. It is expected that this will be able to be manipulated to devolve sections of the Plan to show all arrangements divided across the 4Rs.

5.1.2 MCDEM's roles and responsibilities

A dominant recurring theme from submissions was MCDEM's mandate to provide overarching CDEM leadership, particularly in the area of risk reduction. Given the dominance of this theme, and the number of submitters (10) that provided advice on it, this theme will be explored in greater detail in *6.1.1 Mandate in the area of risk reduction* of this report.

A number of submissions also queried the role and responsibilities of MCDEM as the responsible agency at the national-level for the co-ordination of the provision of welfare services. In particular, CDEM Groups questioned MCDEM's role in relation to the Welfare Services sub-functions of registration, inquiry and needs assessment. Examples of comments are:

"There is some confusion in regards to roles for co-ordinating the Inquiry function..."

"Throughout the welfare section [on needs assessment] there is some confusion that MCDEM will be delivering the service. Also some paragraphs say co-ordinating advice and other state that MCDEM is responsible...."

Following the February 2011 Christchurch Earthquake, a number of reviews, including the *Review of Emergency Welfare Arrangements* (Welfare Arrangements Review Report), were undertaken. The Welfare Arrangements Report sought to clarify arrangements, roles and responsibilities at all levels of welfare services delivery in emergencies. The recommendations of the report were incorporated into the revised National CDEM Plan and provide the fundamental basis for MCDEM's mandate for the co-ordination of the provision of welfare services.

Given the level of re-development that the welfare services arrangements have undergone, the Ministry was unsurprised by the number of submissions questioning the arrangements. In response to submissions, amendments were made to clauses covering:

- MCDEM's and CDEM Groups' roles and responsibilities, to make it clearer that responsibility for the co-ordination of, and arrangements for, local delivery remain with CDEM Groups, while MCDEM supports the coordination of welfare services at the national-level
- the Welfare Services Registration sub-function, to clarify that MCDEM is the responsible agency for the provision of the CDEM welfare registration system and CDEM Groups are responsible for registering people who have been directly affected by an emergency and require emergency welfare services (all other agencies have been removed from this sub-function to mitigate confusion)
- the Welfare Services Inquiry sub-function, to clarify that, at the national and CDEM Group level, the New Zealand Police remain the responsible agency for the process to coordinate inquiries.

Suggested amendments that fell outside the scope of the revised National CDEM Plan (i.e. detailed supporting material or operational arrangements) have been identified for further examination and possible inclusion in the Guide and/or the *Welfare in an Emergency Director's Guideline for CDEM Groups*.

5.1.3 CDEM Groups' role in the delivery of welfare services

Nine CDEM Groups expressed concerns about the “prescriptive nature” of the revised National CDEM Plan in relation to the Welfare Co-ordination Group (WCG) and Welfare Manager roles. Example of concerns included:

“Requiring the Group Welfare Manager to chair the WCG ignores the fact that he/she may not be involved in CDEM on a full time basis. Often in smaller groups, the Group Welfare Manager may not even have a role in council that is welfare-related. Therefore they may not have the standing to chair a strategic advisory group such as the WCG”.

“The current wording requiring a Group Welfare Manager is too prescriptive. Not all Groups are able to resource the provision of a Group Welfare Manager outside of a response. Currently the roles identified within the draft Plan are met through the duties of the Chair of the WCG, Group and Local Emergency Management Officers. Given the extremely limited resources available for CDEM...there is no way in which the requirements set out in the Plan...will be able to be met”.

“For some Groups staffing the key roles required for CDEM is already extremely challenging without being required to nominate and train a ‘cadre’ of Group Welfare Managers. This provision is not required in the draft Plan. Where Groups have capacity they already have alternates identified and trained. Where capacity is a challenge, Groups recognise this and have arrangements in place to seek assistance through MCDEM to access staff resources from other Groups”.

The Ministry has made a number of amendments to the revised National CDEM Plan to clarify and simplify roles and responsibilities (while ensuring accountability) for CDEM Groups in relation to welfare services arrangements. This includes removing the language about a “cadre” of alternate CDEM Group Welfare Managers, while maintaining the expectation that suitable and experienced alternative personnel need to be nominated and trained to enable them to co-ordinate the welfare function during response and recovery.

Further, the language relating to the Group Welfare Manager role has been altered to clarify that CDEM Groups have the mandate to appoint whomever they wish for this role (internally within the Group, or externally within the local authority) provided the appointee is of suitable seniority and experience.

MCDEM acknowledges that the new welfare arrangements in the revised National CDEM Plan raise the bar, both in expectation and commitment, not only for CDEM Groups, but also for agencies. The resulting outcome, is a more comprehensive and consistent alignment of arrangements across the sector, based on the recommendations that the sector supported from the *Welfare Arrangements Report*.

There are likely to be a number of challenges in the implementation of these arrangements, particularly for smaller CDEM Groups. MCDEM understands that the development of sector capacity and capability is likely to be an iterative process, which will be dependent not only upon MCDEM support, but also through communication between MCDEM and CDEM Groups.

6. Reduction, Readiness, Response and Recovery

The New Zealand integrated approach to CDEM can be described by the four areas of activity, known as the '4Rs', including:

- **Reduction:** Identifying and analysing risks to life and property from hazards, taking steps to eliminate those risks if practicable, and, if not, reducing the magnitude of their impact and the likelihood of their occurrence to an acceptable level
- **Readiness:** Developing operational systems and capabilities before an emergency happens, including self-help and response programmes for the general public and specific programmes for emergency services, lifeline utilities and other agencies
- **Response:** Actions taken immediately before, during or directly after an emergency to save lives and protect property, and to help communities recover
- **Recovery:** The coordinated efforts and processes used to bring about the immediate, medium-term and long-term holistic regeneration and enhancement of a community following an emergency.

This section provides a summary of feedback received about the 'Reduction', 'Readiness', 'Response' and 'Recovery' parts of the revised National CDEM Plan. In total, fifty-two submissions, containing 184 comments, were made about aspects of the 4Rs.

6.1 General feedback and themes on 'Reduction'

Fourteen submissions, containing 45 comments were received about the 'Reduction' part of the revised national CDEM Plan as follows:

Submitter	Number of submissions
CDEM Groups and local government	7
Crown entity	4
Lifeline utility company	1
University/academic affiliation	1
Other	1

The major theme to emerge from submissions was MCDEM's mandate to provide overarching CDEM leadership in the area of risk reduction.

6.1.1 Mandate in the area of risk reduction

The major theme to emerge from submissions was MCDEM's mandate to provide overarching CDEM leadership in the area of risk reduction. Typical comments were:

"There should be a single entity nationally to lead hazards work. At present national efforts in this area are coordinated loosely, and it is difficult to assess effectiveness or to align programmes between regions and national bodies. Stronger national leadership in this space, and a clear mandate, are needed. Possibly this should be part of an enhanced mandate for MCDEM..."

“At present, no one organisation is taking overall leadership of the policy framework around the large number of risk reduction activities that take place within New Zealand. We feel that although the risk reduction section has improved in the latest plan, this issue is still outstanding. It is particularly appropriate that MCDEM take the lead as it now sits within the risk section of the Department of Prime Minister and Cabinet.”

“Reduction needs to be actively led at a national level, one way to achieve this is for MCDEM to do rather than merely promote.”

The message from the sector, that Reduction needs to be further examined at the national level, has been prevalent throughout the revised National CDEM Plan consultation process, but also via other avenues across Government including the 2014 reports: Protecting New Zealand from Natural Hazards (Insurance Council of New Zealand) and Managing Natural Hazard Risk in New Zealand – towards more resilient communities (Local Government New Zealand).

Overall, comments on this issue demonstrate that the within the sector there is a drive for:

- greater priority and leadership at the central government level on natural hazard risk reduction, to drive coordination and the development of a strategy and/or a national plan
- more coordination and alignment in legislation, policy and practice
- a more standardised approach to identify and mitigate risks across the country.

The Ministry agreed that natural hazards management is a crucial area of endeavour; evident not just from the Canterbury earthquake sequence, but also from the smaller, though more regular and frequent emergencies that occur around New Zealand due to natural hazards.

The Strategy and CDEM legislation recognise the need for an all-hazards approach, and the need to address the 4Rs, all of which are equally important. However, the complexities involved in managing natural hazards require the coordination of many sectors and agencies at varying levels of government.

At the national level, a broad framework of legislation, policy, regulation and research exists to manage aspects of natural hazards and reduce risk from these hazards. The Government is currently reviewing key components of this framework, including:

- a stronger focus on natural hazard risk management as part of proposed reforms to the Resource Management Act
- improving earthquake-prone building legislation and policy as part of Building Act reforms
- the National Science Challenges programme of work, which provides additional funding for natural hazards research
- an upcoming review of the national CDEM Strategy.

As there are no current arrangements in place for the centralised management of risk reduction, the revised National CDEM Plan cannot reflect such arrangements, however, MCDEM has committed to a future action of engaging further with national agencies to explore options further.

6.2 General feedback and themes on ‘Readiness’

Nine submissions, containing 37 comments were received about ‘Readiness’ as follows:

Submitter	Number of submissions
CDEM Groups and local government	4
Crown entity	3
Non-government organisation (NGO)	1
University/academic affiliation	1

The majority of submitters proposed minor amendments to clarify or simplify arrangements, or offered amendments that the Ministry considered to be too detailed, out of scope, or duplicated other parts of the revised National CDEM Plan.

6.2.1 CDEM Monitoring & Evaluation Programme

One significant theme emerged from the submissions about ‘Readiness’. This was the need for further clarification about the CDEM monitoring and evaluation programme.

It is important for agencies and CDEM Groups to continually monitor and measure progress in order to know when they have reached their objectives, and to ensure they have the capacity and capability to be able to perform their CDEM roles and responsibilities. A CDEM Monitoring and Evaluation Programme was launched by MCDEM in October 2009, to provide an ‘any-time’ self-assessment tool that any agency or CDEM Group could use to evaluate their capacity. The assessment tool was also developed to support a periodic national assessment cycle in which all agencies with responsibility under the CDEM Act would be asked to complete assessments to document and understand New Zealand’s collective CDEM capability.

The Ministry agreed that the current wording in the Plan does not sufficiently describe the CDEM Monitoring and Evaluation Programme. Nor is it clear that MCDEM has oversight of monitoring and evaluation of the Strategy, the Plan and CDEM Groups. This gap has been addressed by expanding clauses 107 and 108 of the revised National CDEM Plan to include arrangements for monitoring and evaluation.

6.3 General feedback and themes on ‘Response’

Of the fifty-two submissions received on the 4Rs, the majority were about ‘Response’. Eighteen submissions, containing 77 comments were received about ‘Response’ as follows:

Submitter	Number of submissions
CDEM Groups and local government	8
Central government	1
Crown entity	4
Non-government organisation (NGO)	1
University/academic affiliation	1
Professional or industry association or body	1
Other	2

CDEM Groups provided over half of all submission comments. The majority of comments were of a minor, editorial nature, however two themes emerged on Part 8, Response covering:

- reporting of emergency information
- mass evacuation.

6.3.1 Reporting emergency information

The sharing of information in an emergency is critical to ensuring that a common operating picture is maintained, so that all stakeholders react to the same information. Emergency information management is about managing and exchanging timely, relevant, consistent and reliable information to aid and support decision-making and enable an effective and integrated response and recovery.

The revised National CDEM Plan outlines the principles underpinning emergency information management and provides direction about the lines of information reporting during an emergency. However, one comment reflected the thinking of a number of submitters:

“This section is useful from a Controller-focussed view point, however the flow of information from partner organisations to the respective Controllers is essential for the ‘significant coordinated response’ requirements of the CDEM Act to be realised. This communication and information sharing is an on-going, two way process, not limited to Controllers and national level agencies – even in a national emergency.”

The Ministry agreed that the revised National CDEM Plan needs to be strengthened to recognise that reporting emergency information is a two-way process, not only between Controllers, but also from Controllers to support agencies and vice versa, at all levels. New sub clauses have been added to clause 129 to clarify this.

6.3.2 Mass evacuation

Mass evacuation of a defined area is necessary when a potential or imminent threat poses unacceptable risks to the safety of people remaining in the area; or the consequences of an emergency have rendered the area uninhabitable.

This is recognised in the revised National CDEM Plan through three of the eleven response objectives, including: the preservation of life; the protection of natural and physical resources; and the provision of animal welfare (to the extent reasonably possible in the circumstances). The management, types and phases of mass evacuation are also outlined in the revised National CDEM Plan.

However, eight submitters expressed concern that that the objectives and corresponding arrangements in the revised National CDEM Plan for animal welfare did not go far enough. In particular, submitters were concerned about the evacuation arrangements for animals (including disability assist dogs), and mass evacuation operational arrangements for vulnerable communities.

One of the lessons that emerged from Hurricane Katrina in 2005 was the importance of having solid animal welfare arrangements in place during an emergency, especially for companion animals. Issues during and following Hurricane Katrina included people refusing to evacuate without their companion animals, emergency services personnel being attacked by frightened and/or injured pets, and people attempting to return to their often unsafe homes to collect their animals.

The revised National CDEM Plan sets out clear, definitive arrangements for animal welfare under the Welfare Services sub-function 'Animal Welfare' (which is led by the Ministry for Primary Industries), and under Mass Evacuation arrangements. While it seems reasonable to assume that evacuees will wish to be evacuated with their pets in an emergency, the primary responsibility for the welfare of animal's lies with the individual owner or person in charge of the animals. This includes both companion and production animals.

A number of submitters suggested that these arrangements could go further to ensure New Zealand practice was aligned with international best practice. Further, concerns were raised that disability assist dogs were not specifically mentioned within the evacuation arrangements. A final issue that was raised by submitters related to the logistical feasibility of evacuating production animals.

The Ministry considered that the revised National CDEM Plan adequately captures best practice arrangements for animal welfare within the confines of New Zealand legislation. However, it was agreed that disability assist dogs should be specifically mentioned for evacuation alongside people. The revised National CDEM Plan has been amended accordingly.

While the evacuation of farm (production) animals is also specifically mentioned in the revised National CDEM Plan, as the responsibility of the owner or person in charge of the animals, this principle under mass evacuation is aspirational. There is no current expectation that this is a requirement for people with responsibilities for production animals.

Submitters also raised a number of points about mass evacuation operational arrangements, particularly concerning vulnerable communities. Predominately submitters were concerned about:

- the need to understand the community when evacuating
- clarifying the 'common law' powers of the New Zealand Police regarding mandatory evacuation before a state of emergency
- understanding how management of evacuations will occur during a national event, rather than at the CDEM Group level.

Identifying communities that may be particularly vulnerable in an emergency and evacuation is of particular importance during the planning process. There are always likely to be 'at-risk' groups in a particular area that may need special consideration to ensure that they are successfully cared for during an evacuation.

The Ministry agreed that it is important to understand the community that is being evacuated, but considered that further detail about this is more appropriately included in guidance material. The subject is covered in more detail in the Guide, and in various MCDEM publications, including the *Mass Evacuation Planning: Director's Guideline for CDEM Groups*.

The Ministry supported the need to clarify the 'common law' powers of the New Zealand Police, and the revised National CDEM Plan has been amended in collaboration with them. Material covering the eventuality of mass evacuation on a national-level will be covered off in more detail in the Guide.

6.4 General feedback and themes on ‘Recovery’

Ten submissions, containing 25 comments were received on ‘Recovery’ as follows:

Submitter	Number of submissions
CDEM Groups and local government	5
Crown entity	5

Overall, submitters’ comments were minor in nature and were generally accepted by the Ministry. Two main themes emerged from the analysis of the submissions about ‘Recovery’. These covered:

- enhancing the recovery section
- transition arrangements from response to recovery.

6.4.1 Enhancing the Recovery section

Recovery involves the co-ordinated efforts and processes used to bring about the short, medium and long-term holistic re-generation and enhancement of a community following an emergency. The revised National CDEM Plan outlines the high-level arrangements for transition from response to recovery, National and CDEM Group recovery activities and an exit strategy.

A number of submitters’ were dissatisfied with the Recovery arrangements in the revised National CDEM Plan, arguing that:

- gaps remained in the national arrangements
- the recovery activities listed were overly static in their representation and did not encapsulate the Canterbury Earthquake Recovery Authority’s five environments.

“Either enhance the Recovery section of the Plan, or give consideration to a standalone document which in more details describes the capability requirements and roles and responsibilities of Recovery”.

“The four environments are overly static in their representation here. More recognition of the dynamic and relative scale or significance of each aspect of the respective contact would be helpful here”

“Social’ does not adequately capture the nature of community at the level envisaged, particularly taking into account the cultural commitments of central and local government in relation to the Treaty of Waitangi. The addition of ‘cultural’ would be of assistance in this matter”.

MCDEM is currently undertaking a review of the legislative framework for recovery. The review aims to:

- develop flexible and principled legislation to enable timely, effective and focussed recovery,
- clarify and support roles and responsibilities in recovery,
- support the transition between a focus on response to a focus on recovery.

The scope of the review can be understood in two stages:

- stage 1: amend the CDEM Act to expand and strengthen recovery provisions, focussing on small to moderate scale emergencies,
- stage 2: a review of the framework for recovery from large-scale emergencies.

The development of the revised National CDEM Plan must be within the scope of the current CDEM Act. Whilst the Recovery part has been improved by way of a more comprehensive set of arrangements for Recovery, further development cannot occur until the review of the legislative framework for recovery is completed and the CDEM Act is amended. In the interim, the Ministry has expanded on national and CDEM Group recovery roles (within the confines of the Act), to provide more depth to the national arrangements. The revised National CDEM Plan may be updated in the future to align with any amendments to the CDEM Act on recovery arrangements.

The Ministry agreed that the dynamic, flexible and scalable nature of Recovery needed to be addressed in the revised National CDEM Plan, as per submitters' comments. A new clause 154(3) has been added under the principles of recovery to ensure any arrangements developed meet the needs of the community during and following an emergency.

The submissions proposing to add "cultural" to the list of environments that recovery activities cover was rejected based on the rationale that the 'social environment' outlined in the revised National CDEM Plan is intended to include the 'cultural' environment. This flexibility was intended to allow CDEM Groups to elevate the 'cultural' component to the forefront, if needed, following an emergency. Further information on these environments, and the process of elevation, will be outlined in the Guide.

6.4.2 Transition from response to recovery

Information received in response to an emergency should also be used as a basis for developing a recovery action plan, and recovery strategy (if required) for establishing and planning effective recovery arrangements. A number of submitters indicated that the revised National CDEM Plan, in its current draft, failed to capture this notion.

"Recovery is much a risk-based aspect of emergency management as are reduction, readiness or response. Planning, preparing and resourcing for recovery should occur well in advance of responses being initiated."

"This section requires some further consideration, due to its undue emphasis on Controllers and Recovery Managers. The events of the Canterbury earthquake responses and various recovery permutations indicate that any transition from response to recovery is, quite rightly, considerably more governance and executively-given than has been recognised in the past, or in this draft plan. Given that "governance" is now recognised in the CIMS manual, and that CIMS is now said to apply to all 4Rs, it would be appropriate to include reference to governance in relation to recovery as well".

The Ministry agreed that governance arrangements require further development but are contingent upon the future review of the legislative framework for recovery and any consequential amendments to the CDEM Act.

In the interim, three new clauses (112(2), 114(4) and 116) have been included under the Response and Recovery parts of the revised National CDEM Plan to more adequately cross-reference the 'transition from response to recovery', avoiding any duplication in the revised National CDEM Plan, as well as remaining in alignment with the CDEM Act. And additional arrangements have been incorporated in the revised national CDEM Plan outlining national and CDEM Group recovery activities such as planning, implementing, coordinating and reporting on recovery activities. Further guidance on these arrangements will be developed for the Guide and supporting Director's Guidelines on Recovery.

7. Government financial support to local authorities

This section provides an analysis of the feedback provided on the ‘Government financial support to local authorities’ part of the revised National CDEM Plan.

7.1 General feedback and themes on ‘Government financial support to local authorities’

Eight submissions, containing 11 comments were received about ‘Government financial support to local authorities’ as follows:

Submitter	Number of submissions
CDEM Groups and local government	4
Crown entity	1
University/academic affiliation	2
Other	1

Six of the 11 comments provided on this part of the revised National CDEM Plan were questions and/or statements seeking clarity on Government assistance arrangements, including about scope, flexibility and transparency.

“Who will draft the policy? What criteria are likely to be set? How/where will this be documented? There is no ability to implement, reimbursement of costs in a transparent, fair and equitable fashion without further amplification within the document.”

Crown financial support in emergencies is provided in circumstances where there has been a significant emergency, generally affecting a large section of a community, and all other sources of funding have been exhausted. Specific support is based on a range of mandates, criteria and triggers, which may be in statute, regulation or Cabinet decisions, or made by Ministerial decision. It is Cabinet however, that identifies and approves the overall appropriate mix of Government financial support to be provided.

The flexibility of these financial arrangements means that, by necessity, the information in the revised National CDEM Plan remains high-level, while further detail is set out in the Guide (The Guide is a ‘living’ document that can be revised as needed). Changes to the scope of Government financial support policy require Cabinet approval.

8. Conclusion

This section provides an overall comment on the outcome of the review and public consultation process and an overview of the next steps.

8.1 Overall outcome of the review and public consultation

The project to review the National CDEM Plan has involved a comprehensive level of engagement with and across multiple agencies/sectors which has in itself provided opportunities to establish and build relationships where they did not exist or to strengthen existing relationships. Strong relationships are key to civil defence emergency management as they enable collaboration and coordination, the identification of synergies and efficiencies, and alignment of work programmes and effort across the 4Rs.

The overarching outcome of the review and the public consultation process is a more robust, complete, well-understood set of arrangements for CDEM across the 4Rs or reduction, readiness, response and recovery and a greater commitment by agencies to deliver on their roles and responsibilities.

The Ministry thanks all stakeholders and members of the public that took the time to review the draft revised National CDEM Plan and provide feedback. The feedback received on the Plan was constructive and supportive of the improvements that had been made to the plan at the time of public consultation. The submissions received during the public consultation process have further assisted and enabled improvements to be made to the final National CDEM Plan.

8.2 Next steps

Cabinet approved the new National CDEM Plan which was given formal approval by the Governor General on 2 June 2015 and made as an Order in Council. The new National CDEM Plan has now been published in the Statutory Regulations series and is available on the Government Legislation website: www.legislation.govt.nz.

The new National CDEM Plan (2015) will replace the current National CDEM Plan (2005) on 1 December 2015. The current National CDEM Plan (2005) continues in force in the interim.

A supporting Guide to the National CDEM Plan is currently being developed to incorporate the new National CDEM Plan wording and provide additional supporting information and diagrams that assist with its implementation.

Both the new National CDEM Plan and supporting Guide will come into force on 1 December 2015.