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ICNZ SUBMISSION ON THE EMERGENCY MANAGEMENT BILL (NO 2) 2026

Te Kāhui Inihua o Aotearoa | Insurance Council of New Zealand (**ICNZ**) welcomes the opportunity to submit on the Emergency Management Bill (No 2) 2026 (**the Bill**). ICNZ and its members are committed to enhancing the resilience of communities and ensuring effective risk management practices. Insurers play a critical role in emergencies in New Zealand, particularly natural hazard events causing damage to property. Insurance products enable individuals, businesses, and communities to recover from these events and support the '4 Rs' framework (reduction, readiness, response, and recovery) that makes up the end-to-end risk management approach of emergency management in New Zealand.

We support the Government's efforts to reform emergency management legislation to better prepare for and respond to emergencies.

This submission builds on ICNZ's May 2025 submission on Strengthening New Zealand's Emergency Management System¹ and focuses on the following priorities:

- Embedding a genuine whole-of-society approach that recognises the private sector, including insurers.
- An emergency management sector that fits into the larger legislative system, including natural hazard risk management (and importantly, risk reduction)
- A coordinated approach of emergency management reform, resource management reform, local government reform and the National Adaptation Framework.

¹ICNZ: ICNZ Submission on Strengthening the Emergency Management System 2025.
<https://www.icnz.org.nz/wp-content/uploads/2026/02/ICNZ-Submission-on-Strengthening-New-Zealands-emergency-management-legislation.pdf>

The insurance sector strongly supports the Bill's intent to strengthen New Zealand's emergency management system and the Government's response to the North Island Severe Weather Events (**NISWE**) Inquiry. ICNZ and its members welcome system reforms that would enable a whole-of-society approach to emergency management. While the Bill takes significant steps in this direction, we urge the Government to consider whether the Bill achieves a genuine whole-of-society involvement in emergency management. In its current form, the Bill enables some of those outside the formal emergency management system to take part in emergency management. However, we see an opportunity to expand on this fundamental principle as the Bill does not set out explicit, legislative pathways for integrating the wider private sector, notably insurers.

Insurance is a critical part of the recovery following disasters, funding a large part of the cost of recovery for individuals, businesses, and communities. Insurance products provide cover to urgent support during response, such as temporary accommodation and business interruption, as well as the longer-term recovery, repairing and rebuilding damaged assets. Often, insurance products can relieve some of the burden from Central Government, regional, and local Civil Defence Emergency Management (**CDEM**) Groups by looking after those affected. Jurisdictions with higher insurance penetration regularly experience faster and higher-quality recovery following disasters.

KEY RECOMMENDATIONS

Below, we summarise a list of recommendations, followed by clause-specific suggestions to amend the Bill. Our suggestions are aimed at creating a statutory basis for better integrating the insurance sector into the emergency management system.

1. Amend the Purpose to reflect a wider scope of system partners in the private sector – the “whole-of-society.”
2. Embed private-sector engagement across planning and assurance provisions by adding national, regional and local planning clauses to require consultation and coordination with private-sector organisations that have roles in emergency management, but that are not classified as lifeline utilities (insurers, banks, essential services).
3. Enable streamlined, pre-agreed information sharing by including provisions enabling disclosure of emergency management information (including placard data and situational awareness information) to relevant private-sector partners where disclosure: (a) supports response or recovery; (b) is in good faith to expedite recovery outcomes; and (c) complies with privacy and other legal safeguards.

4. Create secondary legislation/regulations to establish an accreditation pathway for insurer assessors and agents (training, H&S, indemnity/assurance requirements) that permits controlled access to restricted areas where it is safe to do so.

Clause-level recommendations (summary table)

ICNZ recommendation	Relevant section in Bill	Suggested wording
Integration of the insurance sector into emergency management Part of the "whole-of-society" approach outlined previously	Part 1, section 3 Purpose	Formal recognition of insurers as an emergency management/recovery partner either by: <ol style="list-style-type: none"> 1) expand (g) to include go beyond agencies/organisations identified in the Bill or in Schedule 2 2) Suggest addition of (h) private sector organisations (insurers, banks, essential services like healthcare providers, supermarkets).
Data/information sharing	Rules, section 212 Minister's power to make rules	After (h), insert (i), "providing for cooperation and coordination, such as sharing data or information, with agencies and organisations involved with the management of emergencies including the private sector, where organisations are not already recognised as lifeline utilities (insurers, banks, etc)."
Insurance sector integration	Part 2, Subpart 2 Regional Role Holders, Emergency Management Committees, section 27 Functions of multi-member Emergency Management Committees	After (k), add (l) promote engagement with all stakeholders, including the private sector (insurers, banks) to ensure the most efficient coordination during response and recovery and encouraging the fastest, highest quality recovery.
Insurance sector integration	Part 2, Subpart 2 Regional Role Holders, Emergency	After (l), add (m) promote engagement with all

	Management Committees, section 27 Functions of unitary Emergency Management Committees	stakeholders, including the private sector (insurers, banks) to ensure the most efficient coordination during response and recovery and encouraging the fastest, highest quality recovery.
Insurance sector integration, data/information sharing	Part 3, Subpart 3 National Emergency Management Plan, section 82	Under (2) (d), after the word "management" add "and cooperation with other agencies or organisations involved in the management of emergencies, including the private sector (insurers, banks, etc)".
Insurance sector integration	Part 3, Subpart 3 National Emergency Management Plan, section 86	Under (2) (c) add (d) consult with persons or organisations from the private sector (insurers, banks, etc) who have roles or responsibilities relating to emergency management (including risk reduction, readiness, response, and recovery).
Insurance sector integration, data/information sharing	Part 3, Subpart 4 Local and Sector Plans, Regional Emergency Management Plans, section 91	After (j), insert "(k) the arrangements for managed access by accredited private recovery actors (insurance loss adjusters), and the prioritisation, sequencing, and time windows for entry consistent with safety and public interest."
Data/information sharing	Part 4, Subpart 2 Powers applying during states of emergency, Powers exercised by authorised Controllers	After section 135, add section 136 Power to share information collected in the course of emergency management activities with other parties for the purpose of supporting the response to and/or recovery from the emergency

		(add points below to clarify circumstances/rules – specifically identify insurers).
Data/information sharing	Part 5, Subpart 1 Power to require information, section 173	Under <i>Information must be disclosed only for the purposes of this Act</i> , under (3), add (a) including, disclosing information collected in the course of emergency management activities, provided that the disclosure: <ul style="list-style-type: none"> (i) supports the response to and/or recovery from the emergency (ii) is in good faith for the purpose of expediting recovery timeframes or improving recovery outcomes.
Access to restricted areas	Part 5, Subpart 6 Secondary Legislation, Regulations, 210 (e)	Regulations to set out a pathway to accreditation for insurance assessors? This would allow for access to certain restricted areas as insurance assessors, given training and health and safety processes, could be treated differently from members of the public.

SUPPORTING EVIDENCE AND PRACTICAL POINTS

- Insurance contribution: During the 2023 North Island severe weather events insurers paid approximately \$3.8 billion and managed over 118,000 claims, resolving the majority within 12–16 months. Insurers provide surge capacity (assessors, urgent works, temporary accommodation) that materially reduces public welfare burdens.
- Placard data value: Property-level placard data enables insurers to: (a) identify customers who have not lodged claims and proactively assist; (b) allocate appropriate assessing resources; (c) prioritise customers with urgent needs; and (d) plan

community presence and surge deployments. Lack of consistent placard data delays claims increases accommodation costs, and prolongs recovery.

- Importance of accurate, up-to-date situational awareness: in a large-scale event this information becomes even more critical when there are limited resources and accessibility. The situational information enables insurers to attend areas when it is appropriate, understand the restrictions and any processes that may apply as well as their own staff health and safety. If significant uncertainty exists, insurance resources may not be able to deploy to particular areas because of health and safety concerns.
- Privacy and safeguards: ICNZ supports robust privacy protections. Proposed disclosure powers should be limited to event-specific, recovery-focused purposes, require data minimisation, and be accompanied by standardised, pre-event information-sharing agreement mechanisms.
- Health and safety: Accreditation must require demonstrable health-and-safety training, PPE, and compliance with local controller directions. Accreditation should not override controller decisions where entry is unsafe.

THE '4 Rs' FRAMEWORK

We note that the Bill is heavily focused on the response and recovery phases of emergency management. Recent research commissioned by an ICNZ member found that public spending on natural hazards is dominated by recovery spending, with relatively little invested in reducing risk². With significant seismic risks and increasing climate-driven risks mentioned above, a 'status quo' approach to risk management means that we can expect exposure to risks to intensify over time – both through population growth and continued development and more frequent and severe climate-related weather events.

Fundamentally, insurance is a risk transfer tool. The greater the risk, generally, the higher the premium charged by an insurer to accept that risk. If, over time, risks continue to increase, in extreme cases insurance products may not be sustainable.

New Zealand's emergency management sector is built on the '4 Rs' framework of reduction, readiness, response, and recovery. While insurers support this wide-ranging and aspirational intention, we note that the provisions in the Bill don't provide enough substance to allow the emergency management sector to achieve in all four areas. We therefore suggest that the Bill should contextualise the role of emergency management at the national, regional, and local level within a larger system and recognise the roles of other legislation (the Planning Bill, Natural Environment Bill, and National Adaptation Framework) in managing the risk to people and property.

² Sapere, 2025 Natural hazards-related public spending in New Zealand: Tracking costs over time by the nature of spending (<https://www.iag.co.nz/content/dam/corporate-iag/iag-nz/nz/en/documents/corporate/natural-hazards-public-spending-nz.pdf>)

INTEGRATION WITH OTHER LEGISLATIVE REFORMS

Expanding on the comments above, insurers strongly urge the Government to coordinate emergency management reform with other legislative reforms proceeding at pace. New Zealand is exposed to a wide range of natural hazards, from seismic and geological to climate-driven risks. Resilience to these hazards is essential for New Zealand's ongoing prosperity in the decades to come.

Policies directly relating to risk management must aim at meaningfully and systematically reducing risks. Here, the Planning Bill and Natural Environment Bill, proposed to replace the Resource Management Act 1991 (**RMA**), both play vital roles. Failing to proactively manage natural hazard risk allows for development that may constrain the economy in the long term, as repeated recovery from disaster is known to be far more costly than investment in mitigating risks. Alongside RMA reform, the National Adaptation Framework provides another significant opportunity to address risks for both existing assets and future development where we need to adapt to the risks of a changing climate.

Insurance accessibility over long time horizons is driven by prudent risk management and proactive investment in risk reduction. Integration of emergency management legislation with resource management and National Adaptation Framework ensures clarity both before and after an event occurs and sends clear signals to individuals, communities, and businesses about how New Zealand will manage natural hazard risk. A coordinated approach in these areas of reform offers compounding benefits to deliver durable risk reduction and keep insurance affordable and available.

Emergency management responsibilities have traditionally been carried out by councils, and the Bill does not seek to change this. In a practical sense, councils are tasked with emergency management, including the resourcing, expertise, planning and execution of readiness, response, and recovery for their districts and regions. Emergency management reform is being introduced at the same time as the Government plans to significantly reform local government with fundamental changes to how councils are governed, funded, and how they function. It will be important that councils are well supported to implement emergency management reforms. Investment in the resources required to plan for emergencies and support communities when the unexpected happens should reflect the scale of responsibilities placed on local government. Without this support and sustainable funding to implement changes, reforms to enable a higher minimum standard of emergency management and ensure agencies have the tools to do their jobs effectively may be undermined.

Opportunities to build, or at least support, resilience go beyond policies with the specific aim of enhancing resilience or reducing risk. We urge the Government to adopt a "do no harm" approach to resilience across all policies, even those with other objectives. For example, Going for Growth aims to make New Zealand's economy grow faster, while other parts of RMA reform are focused on the enjoyment of individual property rights. These policies should aim to achieve their objectives without doing harm to New Zealand's resilience. In other words, avoiding "one step forward, two steps back." As discussed above and noted in the draft, resilience is a basis for long-term economic success and prosperity.

CONCLUSION AND CONTACT

ICNZ supports the Bill's objectives and the Government's broader programme to strengthen emergency management. To be most effective, the Bill must create practical pathways for whole-of-society participation that include the insurance sector, increase focus on risk reduction, and align with other legislative reforms. These changes will enable faster and higher-quality recovery outcomes and reduce risks to support continued economic growth and prosperity for New Zealanders.

If there are any questions, or more information is required, please contact Sean (sean@icnz.org.nz).

Ngā mihi,



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