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Policy Unit  
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Attention Policy Unit

Tena Koe

**Rangitikei District Council Feedback on the Issues and Options Paper on the Review of section 33 of the Guide to the National CDEM Plan**

Rangitikei District Council (Council) thanks the National Emergency Management Agency for the opportunity to provide feedback on the Issues and Options Paper on the Review of section 33 of the guide to the National CDEM Plan.

**Issue 2.1 Should we provide guidance on what is considered an 'emergency' and how that will be determined?**

*Question 1: Is there any other guidance on the introduction that would be helpful?*

Council would like to see additional guidance to clarify when a situation meets the definition of emergency under the CDEM Act. As stated in the Issues and Options Paper, section 33.1 of the guide does not provide further guidance on clause 159.

Council does not agree with the proposed approach that requires NEMA to determine whether an event is considered a CDEM emergency for the purpose of section 33 as this would likely cause unnecessary delay in responding to an event. Council's preferred approach would be to either allow for the decision to be made at the CDEM Group Office level or for the definition of emergency to be clearly defined in legislation. Lowering the decision making power to the CDEM Group Office would have further benefits such as providing for a greater level of local knowledge informing the decision, resulting in better decision making.

**Issue 3.1 Should we provide more guidance on the objectives and principles?**

*Question 1: Do you think the objectives and principles, or any terms used in them need further explanation? Why?*

Council has not identified any objectives or principles that need further explanation, however, Council would like to see further guidance on specific support arrangements. This would reduce ambiguity and confusion without the need to provide detailed explanations.

*Question 2: How would you describe the meaning and intent of any terms that you think need further explanation?*

Council would prefer the focus to be on specifying specific support arrangements.

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**Issue 4.1 Should the government reimburse welfare costs where it may be more cost effective for people to shelter in their homes, if safe to do so, rather than evacuate?**

*Question 1: What do you think about the option of making essential welfare items for people required to shelter at home an eligible cost for reimbursement? Is there any guidance or criteria needed to make this work? Please provide details, including any perceived risks.*

If the government was to reimburse costs when it is considered to be appropriate to shelter in place, clear criteria would need to be provided to clarify when a person is eligible for reimbursement for sheltering in place. For example, would a family able to shelter in place with egress from their property meet the definition of people sheltering at home or would they be required to support themselves due to the ability to leave their property? Other situations that should be considered and clearly either eligible for reimbursement or not, include but should not be limited to; communities isolated with no access to or from their community and require air dropped supplies, and when there is a requirement to shelter in place, would the local authority be able to be reimbursed for expenses above BAU activities, such as fuel.

*Question 2: Are the definitions of 'displaced people', 'people sheltering at home', and 'isolated people' right? Are there any other categories that should be considered?*

While the definitions are clear, the circumstances behind the definitions require further explanation. The examples used in the response to Issue 4.1 Question 1 are examples of where further consideration is needed.

*Question 3: Are there any other terms in this section that need more guidance? Why?*

As commented above, clear definitions need to be provided. The trigger point for when someone is eligible for reimbursement for sheltering in place needs to be prescriptive to avoid confusion. In many cases if a person is able to shelter in place, and has egress from their property, they likely would not typically require welfare assistance. Any reimbursement for CDEM Welfare assistance in these situations should also have clear guidelines.

**Issue 4.2 Should we clarify the standard of welfare items that are eligible for reimbursement?**

*Question 1: How could we describe a reasonable and appropriate standard of welfare provision in line with the objectives of the National CDEM Plan?*

Council encourages the avoidance of the use of terms such as reasonable unless the term is well defined.

**Issue 4.3 Should the government reimburse costs related to caring for companion animals that are displaced following an emergency that cannot be accommodated with their owners?**

*Question 1: What costs related to animal welfare should be eligible for reimbursement? Why?*

Council supports option 4.3.2. There are a number of local authorities that do not have large local charities, animal welfare groups, or large vet services within their jurisdiction. These districts typically are large and rural in nature with a disproportionate number of production animals compared to companion animals. During significant events, these districts can

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become isolated from larger metropolitan areas, where these groups and organisations are typically located. Option 4.3.2. would allow territorial authorities that do not have these organisations within their jurisdiction to set up temporary shelter facilities without unfairly burdening the ratepayer.

Council recommends that food and pet litter, basic shelter supplies such as crates and bedding, and transport costs should be eligible for reimbursement.

Food and pet litter are already reimbursed when animals stay with owners at welfare centres and are essential for basic care and hygiene. Extending this to animals housed separately maintains consistency.

Basic shelter supplies should be reimbursable as owners may not have the ability to bring these items when evacuating. These types of items are necessary for safe containment, comfort and hygiene. Penalising owners for circumstances beyond their control such as sudden evacuation or transport limitations undermines the intent of a humane emergency response.

Transport costs should be able to be reimbursed to allow for animals to be rescued or relocated separately from owners in a safe and secure way. Transport may be needed for logistic reasons, not necessarily due to owner neglect. Currently, transport costs are often covered by territorial authorities to prevent harm to animals or abandonment.

Council does not see the need for veterinary care and accommodation and indirect shelter setup costs to be reimbursable. Veterinary care costs are typically covered by pet insurance and reflects the ongoing health related responsibilities of owners. Accommodation and indirect shelter setup costs are a broader infrastructure expense that is not directly tied to individual animal welfare.

Costs related to lifestyle pets may be considered for reimbursement on a case by case basis or supported through local partnerships due to the ambiguity around their inclusion in current legislation.

This approach balances responsibility by maintaining accountability for owners while providing support where needed, supports humane outcomes, and aligns with current framework.

**Issue 4.4 Should the government reimburse other ‘welfare’ costs that are not just for basic needs to meet modern expectations of welfare?**

*Question 1: What other welfare related items could be appropriate to be eligible for reimbursement? Why?*

Council would support telecommunication connectivity to be eligible for reimbursement, Starlink type devices would be a good example of a telecommunication device that should be eligible for reimbursement.

Starlink currently offers a connection at \$5 per month. This type of connection can be upgraded to full connectivity when required for an additional cost. NEMA could actively support the initial purchase of Starlink type devices for designated Welfare Centres and cover the monthly fee.

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This would mean that communities have access to telecommunication during an event as soon as it is needed. Post activation, NEMA could reimburse the increased connection fee as a result of the use of the device.

*Question 2: What should be ineligible? Why?*

Council does not believe that any item not covered by section 33, other than telecommunications should be eligible for reimbursement. All items already identified should cover all basic needs during an event.

**Issue 4.6 Should there be a process to reimburse marae or other organisations for providing welfare when no supporting documentation is available?**

*Question 1: What guidance and expectations could we include to ensure that local authorities assure NEMA that koha is reasonable and appropriate?*

Council suggests that koha is tied to the section 33 definitions.

*Question 2: How could we provide for reimbursement of existing resources (including stockpiled or prepositioned goods) used in an emergency, while still ensuring transparency and accountability in government spending?*

If the koha meets the definitions of section 33, reimbursement should be available, provided that any deliveries, donated packages, or meals are itemised.

**Issue 7.1 Should we do more to enable local authorities to request special policy financial support?**

*Question 1: What more could we say about what is expected to be covered in the local authorities business case?*

Council wishes to note that until a local authority is in a situation where special assistance is needed, it is difficult to know what is required. When a team is already under pressure to restore services, safety, and infrastructure, they do not have the capacity to complete complex business cases, especially when the outcome of the business case is unknown.

*Question 2: Would a staged interim approval process help and how would that best work?*

Council strongly supports a staged interim approval process. This process would be more effective if local authorities were able to understand if the aid sought would likely qualify prior to completing an application. This would reduce time wasted by a team that is likely under significant pressure if a request is not likely to be supported.

*Question 3: What else could be done to improve the special policy process?*

The ability to pre-qualify for special assistance early in the process would provide assistance and certainty to local authorities.

**Issue 8.1 Should there be a deadline for submitting claims?**

*Question 1: Do the advance payment arrangement in the Guide need further explanation?*

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While an open-ended timeframe is not helpful, each event is complex and unique, often resulting in damage not being uncovered for some time after an event. Council supports the staged approach proposed as option 8.1.1.


#### **Issue 10.1 Should we consider other modes for paying for eligible costs?**

*Question 1: What do you think of the options? Pros and cons?*

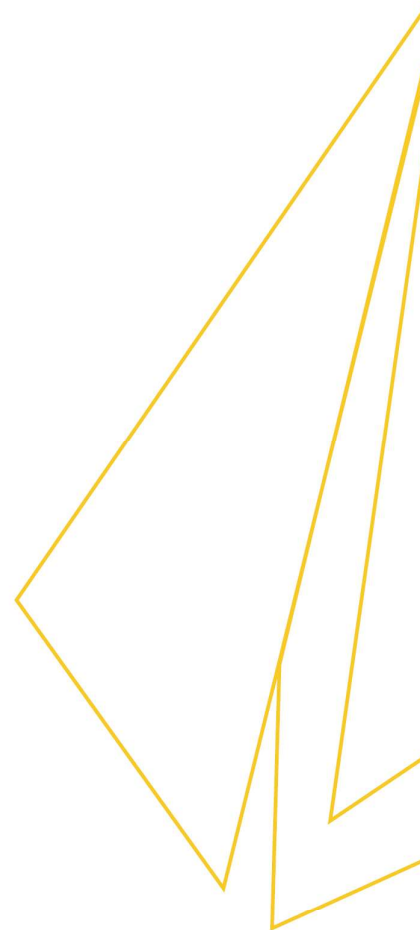
The options involve discretionary decision making. The advantage is that it recognises the unique situations that arise, as per the examples listed. However, it is relying on human beings, who are under pressure to approve support, receiving multiple requests to respond accordingly. Some of the claims during COVID, especially for non-New Zealand residents was an example of this.

Ultimately there was a lot of time to-ing and fro-ing on claims, and further questions of appropriateness, before acceptance (or not). This process tied up multiple people slowing down the process across Councils and the supporting agencies, and increased costs.

Naku noa



Carol Gordon  
Chief Executive – Rangitikei District Council



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