



6 August 2025

Submission: National Infrastructure Plan

1. The National Emergency Management Agency (NEMA) welcomes the opportunity to submit on the draft National Infrastructure Plan.
2. We generally support the recommendations in the draft Plan. Our submission focuses on opportunities for stronger consideration of disaster resilience.

Specific challenges driven by climate change

3. We agree that natural hazards, including those exacerbated by climate change, pose significant asset management challenges.
4. It would be useful if the Plan illustrated some of these risks (for example in **section 5.4.1.**). In particular, we note that risks from climate change include both high-impact, low-frequency and slow-onset events – these pose different challenges:
 - a. Rising sea levels increasing risk to low-lying assets (such as coastal wastewater treatment and landfill assets due to storm surge and erosion).
 - b. Changing rainfall patterns requiring an increase in minimum water storage capacity for community water supplies and hydro-power generation.
 - c. Higher ambient temperatures increasing fire risk in rural areas.
 - d. More frequent and severe storms increasing the risk of structural damage.

Flood protection infrastructure

5. The Plan outlines the challenges and opportunities associated with the water and waste sector and acknowledges regional council responsibilities for flood protection assets.
6. We suggest section **7.3.8.** acknowledge that:
 - a. floods are some of New Zealand's most frequent, most damaging, and most disruptive natural hazard events¹
 - b. challenges noted elsewhere in the Plan (including in sections 1.1.3., 1.2.5., 5.4.1., and 7.3.6.) collectively raise questions about the effectiveness and sustainability of flood defences.

¹ [National Science Challenge: Flood Risk & Climate Change research project](https://deepsouthchallenge.co.nz/research-project/national-flood-risks-climate-change/)

Building back better and managing disruption

7. We strongly agree with the strategic directions outlined in **section 5.4.2.** and support recommendations 18-19.
8. In addition to assessing and managing risk to existing (or proposed) assets, disaster recovery provides the opportunity to trigger risk reduction measures – such as building back in a less exposed location.
9. However, the timing of these decisions is inherently unpredictable. We suggest the Plan should note the tension between sections 5.4. and 6.2. – suboptimal recovery choices (to avoid delayed restoration of essential services) may be necessary in the face of workforce capacity constraints.
10. As well as workforce constraints necessitating sequencing of rebuild efforts, we suggest **section 6.2.2.** should acknowledge that the recovery from major natural hazard events may disrupt the delivery of planned infrastructure projects (including in unaffected regions). This poses difficult prioritisation questions for decision-makers.