



8/08/2023

National Security Group
Department of the Prime Minister and Cabinet
Via email – infrastructureresilience@dpmc.govt.nz

Strengthening the resilience of Aotearoa New Zealand's critical infrastructure system

The Queenstown Airport Corporation (QAC) welcomes the opportunity to provide feedback to the Department of the Prime Minister and Cabinet (DPMC) on the discussion document prepared for strengthening the resilience of Aotearoa New Zealand's critical infrastructure system.

Queenstown Airport has a critical role as a key infrastructure asset and QAC is a lifeline utility defined in the Civil Defence Emergency Management Act 2002 with a dedicated interest in safety and security. QAC will be providing a submission to the Emergency Management Bill and is following the developments in this essential space with interest.

QAC is responsible for maintaining stringent levels of health, safety and security as an aerodrome operator to achieve and maintain its certification requirements under the NZ Civil Aviation Act.

Over the past two years, we have developed our understanding of climate-related risks and opportunities and begun to identify, assess and manage those risks and opportunities. Adapting for climate change, including physical impacts and technological changes, has been and will continue to be integrated into our planning to ensure our infrastructure is maintained, designed and developed appropriately.

In September 2022, QAC adopted its 10-year Strategic Plan. A key commitment in our Strategic Plan was the development of a Services and Utilities Resilience Strategy. The intent of the strategy was to understand the capacity and service resilience of our third-party infrastructure providers. This work has demonstrated that electricity capacity and reliability is the closest and highest risk to Queenstown Airport. QAC understands that our district's drive for decarbonisation will accelerate the need to increase energy capacity to the Whakatipu basin.

Electricity also supports every third-party infrastructure, hence a widespread power outage in Queenstown will interrupt almost all externally-provided services to QAC (e.g., three waters). To strengthen our own resilience, QAC is investigating how it can be self-sustaining in such an event, which may require more backup generation capacity to support services provided by third parties if onsite provision is developed (e.g., pumping and treatment for onsite potable water).

These findings lead QAC to support the discussion document's finding that weaknesses or vulnerabilities in any part of the infrastructure system could appear as weaknesses in every part of the infrastructure system.

QAC considers that those critical infrastructure providers that enable other critical infrastructure should, where it is not commercially sensitive, provide access to its long-term planning to cater to growing demand and how it will ensure resilience. QAC supports wider information sharing and the implementation of an appropriate platform where nationally and locally relevant information can be securely shared.

A nationally coordinated approach is vital given the geographic isolation, challenging terrain and highly dispersed population of Aotearoa New Zealand, the individual ownership structure of most airports around the country, and the importance of a resilient transport infrastructure. Aotearoa New Zealand's airport infrastructure is critical for fast emergency connectivity when disasters strike and land transport corridors fail.

QAC would, in theory, support the establishment of enforceable minimum resilience standards. This support is contingent on analysis of interdependencies of critical infrastructure assets, analysis of the level of criticality of each asset and the availability of enabling legislation to provide for the efficient and effective response to any enforceable standard. Current resource management legislation and the individual territorial authority's interpretations of national direction can adversely affect critical infrastructure providers ability to efficiently respond to changing environmental needs.

If resilience standards were to be introduced, QAC would support process-based requirements over principle-based requirements. Although principle-based requirements will offer more flexibility and enable those who own and operate critical infrastructure to more easily comply with the enforceable standard, QAC considers that a clear standard that can be applied consistently across all critical infrastructure would be preferable, particularly when first introduced. If enforceable minimum resilience standards were to be introduced, QAC considers it is essential that they are simple and easy to understand, clear as to how to comply and will achieve the desired outcome of reaching the 'socially optimal' level of resilience. QAC considers that early engagement with those owners and operators of critical infrastructure regarding the structure and appropriateness of enforceable standards with will be imperative to strengthening the resilience of the critical infrastructure system.

QAC supports the proposal of the government investing in a model to assess the significance of a critical infrastructure asset, and using that as the basis for imposing more stringent resilience requirements. When determining the model, QAC considers that both the residential population and the peak day visitor numbers should be included as a relevant factor.

QAC would welcome the opportunity to further discuss these comments with the DPMC and will be available to assist with its enquiries.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M Brook', is displayed within a light blue rectangular box.

Melissa Brook
General Manager - Strategy