

s9(2)(a) - Web form submission

## Critical Infrastructure Resilience

**What is your name?**

s9(2)(a)

**What is your email address?**

s9(2)(a)

**Are you responding as an individual or on behalf of an organisation?**

Individual

**Do you consent for your submission (including identifying information) to be published and shared in lines with terms for this public consultation?**

Yes.

**Do you consent for your submission (including identifying information) to be published and shared in lines with terms for this public consultation? - Please note what should be withheld and for what reasons.**

Withhold my personal details please.

**Does more need to be done to improve the resilience of New Zealand's critical infrastructure system?**

Yes.

**Have you had direct experience of critical infrastructure failures, and if so, how has this affected you?**

No.

**How would you expect a resilient critical infrastructure system to perform during adverse events?**

Perform at a level to maintain functionality for emergency services, to support the preservation of life and health, and to rapidly return to full functionality (80% plus) once conditions abate.

It's pretty hard to define performance when considering such a broad range of sectors.

**Would you be willing to pay higher prices for a more resilient and reliable critical infrastructure system?**

Yes, when the cost and outcomes are demonstrable.

**The work programme's objective is to enhance the resilience of New Zealand's critical infrastructure system to all hazards and threats, with the intent of protecting New Zealand's wellbeing, and supporting sustainable and inclusive growth. Do you agree with these objectives? If not, what changes would you propose?**

Generally agree.

***Do you agree with the proposed criteria for assessing reform options? If not, what changes you would propose?***

No mention of sustainability or carbon assessment.

***Do you think the megatrends outlined pose significant threats to infrastructure resilience?***

Yes.

***Are there additional megatrends that are also important that we haven't mentioned? If so, please provide details.***

Creating high-paying, value-adding jobs within a circular economy that allows more New Zealanders to prosper.

***Do you think we have described the financial implications of enhancing resilience accurately? If not, what have we missed?***

Yes. But defining the cost increases as "short term" is misleading. The cost increased will be baked in as part of the desired level of resilience we wish to maintain.

Also, there was no mention (unless mentioned elsewhere) of the need to de-couple this work from the Political cycle and associated changes in priorities from elected officials.

***How important do you think it is for the resilience of New Zealand's infrastructure system to have a greater shared understanding of hazards and threats?***

Very.

***If you are a critical infrastructure owner or operator, what additional information do you think would best support you to improve your resilience?***

Robust disaster modelling and the publishing of these exercises for public/industry feedback. A centralised public sector entity to provide authoritative opinions on best-practice, and to act as an enabler of a shared understanding.

***What do you think the government should do to enable greater information sharing with, and between, critical infrastructure owners and operators?***

Review the fragmented efforts currently underway within different sectors/entities, and fundamentally reset the approach to centralise the work.

***Would you support the government having the ability to set, and enforce, minimum resilience standards across the entire infrastructure system?***

Yes, but there needs to be a strong focus on enforcement. Too many regulatory bodies end up dishing out minimum fines etc. for corporate non-compliances. Perhaps the enforcement needs to extend to individual liability & liability beyond termination of employment.

***Would you support 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?***

Yes. The question of options is too open-ended. When investing in a model, I think there would be merit in considering something open source, or which could become an accessible tool for industry to leverage.

***What criteria would you use to determine a critical infrastructure asset's importance? Investing in a model to assess a critical infrastructure asset's criticality, and using that as the basis for imposing resilience requirements that are more stringent on particularly sensitive assets?***

Not informed enough to comment.

***Do you think there is a need for the government to have greater powers to provide direction or intervene in the management of significant national security threats against a critical infrastructure? - Is there a need for greater powers? If so, what type of powers should the government consider? What protections would you like to see around the use of such powers to ensure that they were only used as a last resort, where necessary?***

Yes. Protections being cross-party support, perhaps a co-governance council to endorse/reject.

***Do you think there is a need for a government agency or agencies to have clear responsibility for the resilience of New Zealand's critical infrastructure system?***

There is a need to have clear responsibility. These should be within existing agencies where possible, or in a new, overarching entity.

***Do you think there is a need for compliance and enforcement mechanisms (eg. mandatory reporting, penalties, offences) to ensure that critical infrastructure operators are meeting potential minimum standards?***

Yes, applied to both.

***What additional comments do you have?***

[Nil]