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Department of Prime Minister and Cabinet (DPMC)

Submitted via email: [infrastructureresilience@dpmc.govt.nz](mailto:infrastructureresilience@dpmc.govt.nz)

**Submission – Strengthening the resilience of Aotearoa New Zealand’s critical infrastructure system**

- Wellington Airport supports the goal of enhancing the resilience of New Zealand’s critical infrastructure.
- We provide a vital connection for Wellington to the outside world in the event of a major emergency such as an earthquake where other forms of transport (e.g. road, rail and sea) are vulnerable.
- We are open to considering new regulatory requirements but do not see a strong need for them to apply to major airports like Wellington Airport. This is because we already meet and achieve many of the goals of this work programme:
  - We (and other airports) are already well regulated. Under the Civil Defence and Emergency Management Act 2002 we are designated a ‘lifeline utility’ which requires us to maintain our facilities for use in a state of emergency.
  - As an Airport Authority, WIAL is responsible for planning the development of the airport to ensure that it can meet the needs of the population it serves. We are already obliged to take a long-term approach and commit resources towards planning and protecting for the future of the Airport. We believe our standards are already well above what the proposed minimum resilience standards might be.
  - Resilience is therefore a major priority for us and we have a number of projects underway including reconstruction of Taxiway Bravo and seismic upgrades to building stock.
  - A vital resilience project coming up is replacement of our seawalls and breakwater which are reaching the end of their design lifespans. As well as protecting the runway from inundation and erosion, this infrastructure also protects the Moa Point Road and tunnel along with major pipelines transporting most of Wellington’s waste to and from the Wastewater Treatment plant. This work is crucial given sea levels are rising and the frequency and severity of storms continues to increase. We are supportive of setting clear responsibilities when it comes to large resilience projects like this.
  - Wellington Airport already shares and releases large amounts of information on our performance and resilience, both voluntarily and as required by regulation. This includes an Annual Report, Financial Reports, Annual Disclosures, Summary of Performance, a Kaitiakitanga report and climate-related financial disclosures (TCFD).

Our [2040 Masterplan](#) also contains detailed plans on how we plan to meet future passenger demand.

- It would be useful for future publications on this topic to acknowledge that many providers (like airports) are well regulated, transparent and resilient.
- Careful consideration needs to be given to how any new regulatory requirements would interact with price setting rules faced by airports. Pricing is a complicated process overseen by the Commerce Commission, so if there are to be new regulatory requirements then the Commission may need greater scope to consider resilience investment.
- It is also important to take a whole-of-Government view and ensure this work aligns with other Government priorities. One example would be Resource Management Reform, and ensuring this doesn't make infrastructure resilience investment more difficult.
- It is encouraging to hear this work programme will be closely coordinated with the new Emergency Management Bill which has very similar goals.

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For questions or further information please contact:

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