

Summary of submissions

In June 2021, Fire and Emergency New Zealand issued 16 draft fire plans for formal public consultation. Feedback came from members of the public, urban and rural land owners, territorial authorities and others, who brought a range of industry perspectives on farming, forestry, conservation, and infrastructure. We also had submissions from individuals and groups involved in emergency preparedness.

Formal feedback was received online (89 responses) and by email (over 60 responses). Some of these comments were forwarded by regional Fire and Emergency staff from interested parties in their region. Fire and Emergency advertised the consultation on Facebook, and comments received were included as submissions where it was clear that there was an opinion.

Themes from the commentary included:

- whether the plans meet legislative requirements and whether we could call the plans something else
- the short timeframes around putting the plans together, and when the next review should be
- questions about response
- questions about planning for structure fires, and animal welfare
- relevant MOUs and agreements
- whether the plans should include the relevant local council bylaws affecting fires
- updates and amendments for local information in the area overview and zone information
- queries about the size of zones
- questions about how trigger thresholds are set
- an understanding on how hazard enquiries are assessed
- how we restrict activities
- how firebreaks would be required, and ways to achieve them
- what types of fire require permits or are allowed in restricted seasons or prohibitions
- protection for infrastructure and lifelines
- NZDF fire plans and powers

As a result of the feedback on the draft fire plans, relevant amendments have been made, and the plans have now been finalised.

General feedback on sections

Introduction

The introductory section of each fire plan sets out the legislative requirements for Fire and Emergency to prepare a fire plan for each area. It set out the prescribed content, and processes for consultation, review and amendment for these plans. This included outlining what other strategies, planning, operational service agreements, memorandums of understanding (MOUs) and policies a fire plan must be consistent with.

Most online respondents agreed that purpose and legislative requirements were clearly defined in the plan, though a few disagreed with this. Of those that disagreed, some suggested that it was fundamental to a fire plan to set out the action that Fire and Emergency planned to take in response to fires, but this does not reflect the legislative purpose of a fire plan.

Other feedback on this section of fire plans generally noted that the focus seemed to be rural or did not include structural fires. The legislative purpose of the fire plans is primarily around our fire control powers regarding fires in the open air, regardless of whether they are in a rural or urban environment.

While not disagreeing with the scope, some suggested that the focus and scope of the fire plan could be clearer - this could be achieved by changing the title to Fire Reduction Plan, including a clearer statement of scope, a brief outline and more information about where to find out about fire response activities and Fire and Emergency's national strategy and relevant policies.

We included more information about how fire plans fit into the range of reduction work that Fire and Emergency undertakes, as they do not include fire reduction activities for structures. And then explained how the Readiness, Response and Recovery aspects of Fire and Emergency's work. The fact that the plans do not cover all reduction activities is one of the reasons they have not been called Fire Reduction Plans. The legislation also states that we must produce fire plans.

Others suggested the content of plans should include at least an overview of any relevant agreements, MOUs and bylaws (rather than just links to documents). Some organisations that were party to agreements or MOU's sought inclusion as a stakeholder, greater stakeholder status and/or the substance of arrangements/by laws to be reflected in plans. This was on the basis that the Plan itself should contain (and not just refer to) all relevant information (a one-stop shop).

Linking to the relevant additional information allows for those documents to be updated outside of the cycle of fire plan amendments, and prevents the fire plan from containing out-of-date information with regards to agreements and bylaws.

A few online respondents had not been able to locate the plan, and others noted that they were responding within time constraints or suggested that the review and amendment period for their particular plan should be every year rather than three years.

The new finalised plans will be published on their own page on our website, and state that they may be reviewed and amended sooner than the three-year time limit to ensure we can continue working with stakeholders to improve the plans.

Framework for fire control

The fire plans set out the mechanisms for managing fire risk with regards to the National Framework and key elements including: Fire seasons, Section 52 related prohibiting of open fires, or prohibiting and restricting activities, fire permits, use of fire breaks and fire hazard removal, and regulatory compliance.

Key feedback on these sections included seeking more information on policies and the National Framework itself. More information was also sought on thresholds for setting fire seasons, Section 52 prohibiting fires in the open air, and prohibiting and restricting activities. It was stressed that this information is needed. Territorial local authorities sought greater mention or consistency with relevant bylaws. Farmers questioned the practicalities of a blanket restriction of some activities when facing critical harvesting timelines and sought a more flexible approach involving the management of fire risk on-site – e.g. through water tanks or extinguishers.

Some feedback concerned the use and decision making about fire breaks with forestry companies wanting to be involved in decision making about fire breaks around their forests. DOC and conservation organisations were concerned about the removal of vegetation (for fire breaks/hazard removal) in areas of special ecological value.

Feedback was also received on additional risks or the classification of risks (for example, hot works) or strategies for managing risks (e.g. roadside mowing, transport infrastructure)

the classification of authorised fire types in a restricted fire season.

A range of general feedback was also received on issues concerning air quality, carbon forestry and fireworks.

The section on the National framework for fire control was expanded to include more detailed information about:

- fire risk conditions
- why we set fire season
- information about who controls the use of fireworks
- the full definition for authorised fire types in restricted and prohibited fire seasons
- information about how to apply for a permit and how they are assessed
- information about how fire hazards are assessed
- more detail around firebreaks

Fire plan area and zone information

All of the local information relevant to each particular fire plan area was moved to the back half of the document to make it easier for people to find. The front portion of the document contains policy and procedure, and information that is consistent across all fire plans.

The area overview section includes the relevant geography, demographics, the individual zones (reflecting fire risk) within the wider area, any New Zealand Defence Force activity, frequency of elevated fire danger, and fire history for the whole fire plan area, as well as the stakeholders and associated need for involvement in fire plan development; fire plan amendment; changing fire seasons; and section 52 related fire prohibitions or restrictions or prohibitions on activities.

The zone information includes each zone's geography, demographics, climate/weather, land cover/land use, industry, lifeline utilities/other infrastructure, recreational locations, cultural and recreational activities and events that contribute to fire risk, or are affected by our use of our fire control powers. Special risk areas, known fire hazards, frequency of elevated fire danger, fire history, predominant fire type, thresholds, representative weather stations, zone-specific stakeholders and a map of the zone. Information is also provided for how public conservation land is managed.

Feedback on these sections generally concerned additional information from stakeholders, corrections or suggestions for rewording to better reflect the description and categorisation of a specific area or fire zone (including mapping), fire history, special risk areas and stakeholders. This information was incorporated where relevant.

A few people questioned the need to mention the New Zealand Defence Force in regions where there is no NZDF presence or activity in a region. Fire and Emergency has an agreement with Defence that our permitting requirements will apply outside of specific Defence Areas. Since this is different to what the legislation indicates, it is specifically included in all plans to provide clarity on the use of our powers.

Some questioned methodologies used for determining frequency of elevated fire danger or thresholds or the categorisation into particular zones (suggesting that

fire risks varied markedly within a zones), and suggested locations for additional remote access weather stations.

This has been recognised, and there will be an opportunity during the scheduled fire plan amendment process to create smaller, more targeted zones, subject to installing additional weather stations in locations where there are gaps in data, along with local knowledge. A project is underway to establish 80 additional weather stations across the country to enable this.

Out of scope topics

There was a large amount of feedback received that was outside of the legislative scope and purpose of these fire plans. This feedback will be relayed to the relevant teams within Fire and Emergency.

Response/ operational planning

A number of the submissions related to issues that should be included in Fire and Emergency's readiness or response work, this included:

Working with MPI and agencies such as Rural Support, Animal Evac NZ to ensure animal management is incorporated into fire response and management of an incident, as the protective nature of animal owners will put their lives at risk to save the animals, and working with MPI to identify and incorporate the locations of intensive agricultural livestock industry, such as kennels, vets, stables, stud farms, chickens, pigs and goats, into our mapping and planning.

Biosecurity issues around firefighting in or near ecologically significant areas, and to prevent the spread of invasive species.

Access for emergency vehicles

There were some comments around ensuring that there is suitable access to new subdivisions for emergency vehicles.

Fire and Emergency has a national contract in place that is focused on planning activity across all District Councils. As part of this work, any issues relating to water supplies for firefighting or access for fire trucks to new developments are raised so that Fire and Emergency can make an appropriate submission as part of the planning process.

Aerial appliances

There were some comments about the lack of and/or capability of our aerial appliance fleet.

We service our aerial appliances on a regular schedule to ensure they are maintained to a high standard, reflecting the manufacturer's recommendations. Our national aerial replacement programme is currently on track and we have begun a project to acquire four new replacement aerial appliances.

Career/volunteer stations

There were comments about how Fire and Emergency makes decisions on the placement of career and volunteer stations.

When looking at the future needs of New Zealand, we listen and talk to a wide range of stakeholders. We regularly meet with the councils to talk about future growth and community needs.

When we plan for where to put fire stations, we look at a range of factors. These can include access to motorways, accessibility to local hubs and how potential station or personnel changes will increase our response capabilities. When looking to futureproof our capabilities, we look at large geographical areas, growth analysis and callout patterns. We are dedicated to supporting our communities around New Zealand, and we continue to plan for their future needs.

Sirens

The use of the sirens on fire stations to summon volunteers is a common discussion and a hot topic on social media.

Sirens are one method Fire and Emergency uses to alert its volunteers when an emergency occurs. We also use pagers and mobile phones to alert volunteers directly.

Additionally, we also have phone apps that are an extra means of alerting our crews to incidents.

Our new apps enable our communication centres to have a live view of our volunteers responding to the station so there is no risk to the public of volunteers not responding due to a pager failure. We have systems in place to monitor response, and a range of backup systems (including sirens) to ensure that we are able to respond.

Specific feedback relevant to all fire plans

Reference	Description from submission	Agree Y/N	Response/Action Taken
Structure <i>Individual submission</i>	The content and form of the plans varies a little more than expected (across the 16 plans). I suggest that a more standard national approach to the actual content would improve the plans and make them easier to maintain.	Y	The localised information has been moved to the back of each plan, so that the front section is consistent across all fire plans. Over time, we expect the local content sections to become more consistent in terms of the type of information included. However, the content itself will always vary based on unique local values and community needs.
	The plan is not in a form that it is easy to find or compare information for planning purposes. The essential information is buried in lengthy and verbose text. The use of simple structured tables to set out conditions (eg the multiplicity of Fire Danger trigger points) would greatly simplify the plan and make it more readable.	Y	We have rearranged the structure of the document so that information that applies nationally, such as how we use our powers, makes up the front section of the document and all tailored content for the fire plan's local area is contained in the second part of the plan. More information in table format has been added.
Length <i>Individual submission</i>	I suggest that overall, the drafts are not presented in the form of <u>a plan</u> . The documents contain a lot of unnecessary (for the purposes of a plan) information and discussion that has simply been copied across from information documents where that level of detail should remain. It is reasonable that the audience can be expected to have some understanding of rural fire and only links to external information should be included in a plan.	N	The audience for these fire plans, are our national and local stakeholders, as well as the whole public, and therefore includes people who may have little knowledge or understanding of rural fire. For example, restricted and prohibited fire seasons will apply to anyone lighting a fire in the area including within an urban setting (someone's backyard). The Fire and Emergency New Zealand (Fire Plans) Regulations 2018 (the Regulations) do not require that the fire plans be set out in any particular form, instead focusing on the purpose and content. It is permissible that additional information be contained where we consider it is relevant or useful for achieving the purpose of the fire plans.
Purpose <i>Individual submission</i>	Purpose The draft plans generally fail to meet their purpose as set out in the Regulation 2018. Level of completeness or detail with respect to the very specific requirements of the regulation: transparency/predictability in relation to the use of FENZ's fire control powers; detailing the policy and procedures for fire control.	Y&N	The Regulations specifically provide that one of the purposes of a fire plan is to provide transparency and predictability in relation to Fire and Emergency's use of fire control powers in sections 52 to 58 and 62 to 68 of the Fire and Emergency New Zealand Act 2018 (the Act). The content of the fire plans has been drafted with that at front of mind. We agree that the plans could helpfully contain more detail around the policy and procedures related to these areas. As a result, we have since added more information from our internal policies and procedures.

Reference	Description from submission	Agree Y/N	Response/Action Taken
Purpose <i>Individual submission</i>	Title and Introduction The title and the introduction to each plan needs to clearly state that it is specific to rural fire in the area as required by the Act and excludes urban fire. As has been evidenced on social media, without this qualification it is reasonable to the reader to assume that it is a plan for all fire in the area which generates some confusion as there is no mention of urban fire.	N	Our fire control powers in sections 52-58 and 62-68 of the Act do not have regard to solely rural or solely urban environments. They apply equally to a backyard fire in a city area as they do to a land clearing burn in the high country. However, so that it is clear that fire plans are one element of our broader work, we have added a section about the 4 Rs of emergency management and how fire plans are part of our Reduction work. We've also mentioned the other reduction work that we do in the built environment.
Authorised Fire Types <i>Defence</i>	Open Drum and Manufactured Incinerators with Spark Arrestors Wording needs to be separated so it is clear that open drums are not required to have spark arrestors, as per the information on the FENZ website. One of the general fire safety conditions that apply to this authorised fire type in a restricted season is to “use clean burning fuel such as untreated, dry wood and seasoned or browned-off vegetation.” Given the nature of the activity, NZDF would not be able to meet this condition. The condition should be amended to add the words “unless the fire is being lit by the New Zealand Defence Force”.	Y	Updated the authorised fire types to include the full definitions and conditions for lighting them.
Bylaws <i>DOC</i>	Conservation Land and DOC Definitions Clarification Marginal strips and foreshores	Y	Any land that is not administered by DOC or Defence, is under Fire and Emergency's fire control powers unless superseded by local bylaws.
Defence Areas <i>Defence</i>	Fire Control Powers Defence Activities Although Defence Areas that do not have independent rural fire plan coverage would be subject to FENZ's permitting requirements as per the Agreement, they would not be subject to all FENZ's fire control powers as they are exempt from the Act under section 5. These sections should be updated to reflect this.	Y	In areas that don't have a scheduled Defence area with its own fire plan, the local fire plan has been updated (see below) to reflect the Fire and Emergency New Zealand/Defence OSA. None of the scheduled Defence Areas are in the Bay of Plenty local area. Any New Zealand Defence Force activities, including training activities, in other Defence Areas are subject to Fire and Emergency's fire permit requirements, though not our other fire control powers.

Reference	Description from submission	Agree Y/N	Response/Action Taken
Fire Control Measures <i>Federated Farmers</i>	Primary Production Activities With the different terms used, the associated tick box for 'needs to be protected by using fire control measures' is not always marked. Recommend that all primary production activities the tick box needs to be protected by using 'fire control measures' is marked as applying. Recommend that all primary production activities the tick box needs to be protected by using 'fire control measures' is marked as applying.	Y	Amended as requested.
Fire Hazard Removal <i>Akld Emerg Mgmt & DOC Nelson</i>	Removal of Vegetation Don't understand the process	Y	Added further detail about Fire Hazard Assessment process.
Firebreaks <i>Christchurch City Council and DOC Nelson</i>	Green Breaks Almost no detail around green fire breaks and fire resilient plantings. All very topical and should be included.	Y	Provided further detail, updated the firebreaks information to include green fire breaks as a tool for risk mitigation. Note: further policy and guidelines are to be developed.
Policies <i>DOC Gisborne</i>	Internal-use policies are mentioned. Are they publicly available? Internal policies should be publicly available to ensure decisions are made objectively, especially around Fire Hazard Removal, Compliance and Enforcement and Fire Breaks policies.	Y	We have added more information from our policies and procedures, but documents in full are available on request.

Reference	Description from submission	Agree Y/N	Response/Action Taken
Restricting and Prohibiting Activities <i>Individual submission</i>	Trigger Thresholds The differences across the 16 plans with respect to the fire danger trigger threshold criteria is not clear to me. The criteria does not comply with the national standards for the Forest Fire Danger Class (FFDC), the Grassland model (GFDC) or the Scrub model (SFDC), the criteria for the classes also vary from area to area.	Y	A new guideline has been developed to assist Districts when creating or amending their fire plan to determine the triggers for declaring restricted and prohibited fire seasons. While the triggers each District uses may vary depending on the wildfire risk, there should be greater consistency for how these triggers are derived, noting that primarily the setting of triggers is to use the New Zealand Fire Danger Rating system and its component the Fire Weather Index system, which provides measurable tracking of the risk conditions.
Restricting and Prohibiting Activities <i>DOC Nelson</i>	Trigger Thresholds Is there a timeline for the development of trigger thresholds?	Y/N	We have expanded the information on prohibiting fires in the open air applying section 52. Triggers for a prohibited fire season are already developed and are in the plan. Where local triggers have been set, they are now included the relevant fire plan zone information.
Restricting and Prohibiting Activities <i>Te Uru Rākau</i>	Trigger Thresholds Some plans state they “will advise....” Industry or user groups about restrictions or prohibitions. Nice to see others indicating that they “will consult/work with/give consideration to/agree on thresholds....” In the spirit of working with the community.	Y	During the consultation process we have identified stakeholders that need to be consulted during decision making. Accordingly, stakeholder lists and levels of engagement will be revised if necessary, at the next review. When we are setting trigger thresholds for prohibiting and restricting activities, relevant stakeholders should be consulted in the process of setting the thresholds and before applying them.
Restricting and Prohibiting Activities <i>Watercare Services Ltd</i> <i>DOC Nelson</i>	Power Lines The reference to power lines requires a stronger statement. Powerline activities are a known cause of unwanted wildfires.	Y	We have listed the regulations that apply, and added further information highlighting electricity transmission as a fire risk.
	Hotworks and Power Line Auto Reclosers National consistent approach to Hot Works and Powerline Auto Reclosers, rather than what appears to be localised controls.	Y	Where triggers have been set with local power companies, they are now included the relevant fire plan. Further work is underway to be included in future fire plans.

Reference	Description from submission	Agree Y/N	Response/Action Taken
Restricting and Prohibiting Activities <i>NZ Forest Managers</i>	Harvesting, thinning Separate harvest (tree felling), from thinning, change in fuel type. The risks associated with these types of operations are quite different – both from fuel type and risk of ignition potential.	Y	Referenced the NZFOA Fire Risk Management Guidelines as best practice and supported by Fire and Emergency. Where local triggers have been set, they are now included the relevant fire plan zone information.
Restricting and Prohibiting Activities <i>Defence</i>	Prohibiting fires in the open air The Fire Plans should clarify that the restrictions under sections 52-55 of the Act do not apply to Essential Services, and Essential Services should be defined in the glossary.	Y	Added a section on essential services under restricting and prohibiting activities.
Naming conventions <i>Federated Farmers</i>	Primary Production Recommend using the term ‘primary production’ instead of farming or agriculture to describe the industry.	Y	Have added the reference to Primary Production.
Special Risk and Activities in Rural Areas <i>MPI</i>	Animal Welfare Suggest wording around animal welfare is taken from Northland plan and incorporated into all plans.	N	Animal welfare is a response activity and will be included in response and/or tactical plans where appropriate.
Stakeholders <i>NZTA</i>	Traffic Management Waka Kotahi (NZTA) should be included in each plan’s lifelines table and zone stakeholder table. Plans are silent on traffic management of relevant sites and MOU between NZTA and FENZ.	Y	Issues that affect NZTA are listed in the lifelines table as roading network. These issues apply equally to Councils and other road management authorities.
Stakeholders <i>Wenita Forest Products</i>	Forestry Service Agreements Forestry agreements should be referenced in the fire plans.	Y	Where forestry agreements are in place, they are now mentioned in the relevant fire plan zone information.

Reference	Description from submission	Agree Y/N	Response/Action Taken
Weather Stations <i>Federated Farmers</i>	Weather Stations Remote Access Weather Stations	Y	Work underway to install a further r80 RAWs, working with Districts for placement.
Zones <i>Te Uru Rākau</i>	Public Conservation Land Zones handled differently in each plan. Lack of crossreferencing between the different chapters. Only a couple of fire plans are really clear that while the zone description discusses PCL, the restrictions on those lands are covered specifically in their own zone at the back – eg the Canterbury and Marlborough Plans refer to PCL in the zone description but then cross reference to the PCL Zone at the back for restrictions etc.	Y	We'll be looking to improve these references at the next review.