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| Fire Services Review:  Submissions Summary  September 2015 |
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Word cloud showing most common words in submissions



This word cloud was computer-generated from the submissions received. It shows the most frequently-used words of three or more letters. It does not include the word “fire”, or common words such as “and” or “the”. Words with the same root are included only once, for example, the words community, communities, community’s and so forth, are included only once as “community”.

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# Executive summary

This report summarises the key themes that the Department of Internal Affairs (the Department) has identified from the 235 submissions that the Department received on the Fire Services Review (the review) discussion document that was released on 27 May 2015.

Overall, the submissions demonstrated support for change with over fifty per cent of submissions supporting a change in the way that the fire services operate and are structured. There were three governance and support options in the discussion document: enhanced status quo, coordinated service delivery, and one national fire service. Each option was presented as a separate, fixed package so that it could be compared – but there were many different ways the options could be put together. This was emphasised throughout the discussion document and during our discussions with stakeholders, and is captured in this summary report by focusing on key themes.

The report is structured by first providing an overview of the submitters that expressed their opinions in this process. The current state is then explained, to reflect submitters’ views on what is working well with the fire services and what are the current problems and consequences that need to be addressed. Submitters’ preferences for the governance and support options are presented according to the themes that submitters raised in their submissions.

These themes emphasise the areas that need to be focused on when considering any changes to the fire services and include:

* supporting volunteers;
* the effectiveness of service delivery;
* close engagement with communities;
* transition processes; and
* funding purposes and principles.

Support for the options for funding the New Zealand Fire Service Commission (Commission) is similarly presented, with an analysis of the key themes of:

* fairness;
* reducing free riding;
* reflecting the range of activities that the fire services provides;
* providing sufficient and sustainable funding; and
* information about practical matters that the funding options need to provide for.

## The submitters

Figure 1 below shows the 235 submitters split by submitter type. The types are defined by the industry they are involved with or their organisation group. Individuals are listed as their own submitter type. The ‘other organisations’ included residents associations, a research organisation, museums and electricity associations.

**Figure 1:** Submitters by submitter type



The majority of submissions came from individuals with 79 submissions. Most of those individuals identified as firefighters and many had a long history either working or volunteering with the fire services, with current and former Principal Rural Fire Officers, Rural Fire Officers and Chief Fire Officers, forestry sector employees, a former Area Commander and other management in the New Zealand Fire Service (NZFS), a former President of the United Fire Brigades Association (UFBA), and a former National Rural Fire Officer. A number of individuals had worked or volunteered both for NZFS and for rural fire services.

Government agencies with an interest in fire services or a role in delivering fire services, such as the Department of Conservation, did not make submissions on the discussion document because they have been involved in the policy development process with the Fire Services Review Team. A list of all government agencies that are involved with the review can be found at Appendix One.

## Current state of the fire services

### What is working well

The discussion document asked submitters about what is currently working well in the fire services. A wide range of submitters answered this question. The majority of submitters commented on team work as an area that was working well, with 118 submitters. These submitters talked about the strong coordination within the different fire services and between fire services and other emergency services. Submitters also focused on volunteers’ contributions to the fire services.

A further 89 submitters considered that rural fire services were working well because of the service that they provide to their communities, and because of the structure of the Enlarged Rural Fire District (ERFD) model. Others considered that areas that are working well include:

* NZFS structures and processes, including the independence of NZFS volunteer brigades (22 submitters);
* emergency services’ coordination (13 submitters);
* urban fire services, including leadership and culture (18 submitters);
* specific functions, including research, risk reduction and medical response (14 submitters); and
* the provision of equipment, training and resources (14 submitters).

### Problems and consequences

Even though there are areas that are working well, most submitters (over 180 submitters) agreed that there are problems that need to be addressed. The discussion document set out three core problems: changing expectations, a lack of coordination and variable leadership, and investment that is inconsistent with community needs. The discussion document considered that these problems led to six consequences: health and safety issues for rural fire, volunteer shortages in some parts of the country, challenges to support the workforce, mixed or unclear responsibilities, challenges to be effective and challenges to be efficient.

#### The most common problems: changing expectations and supporting the workforce, especially volunteers

A wide range of submitters responded to the question that asked if submitters agreed with the problems and consequences that the review identified. One hundred submitters agreed that changing expectations was a key problem, with updating the mandate for the fire services to provide non-fire activities as the main issue to be addressed. This was followed closely by a need to better support the workforce, with a particular emphasis on recruiting, retaining and supporting volunteers. A common concern for volunteers included training that is adequate and relevant, without being too academic. Another common concern was the pressure on volunteers’ time.

#### Challenges to be effective

Ninety submitters agreed there were challenges for the fire services to be effective, with many submitters considering this related to the differences between the urban and rural fire services, including the lack of coordination, barriers to coordination and different attitudes and culture. Submitters also considered that a lack of resourcing, the lack of a national reporting system and other systems contributed to challenges to be effective.

#### Investment inconsistent with community needs

Eighty-eight submitters also agreed that investment was inconsistent with community needs, especially with an under-investment in rural fire. Eighty-six submitters agreed that there was a lack of coordination and variable leadership. A number of submitters considered that the system worked “despite itself” because of the particular people involved making it work. The structural separation between urban and rural fire was considered by many submitters to be a barrier to better coordination.

#### Volunteer shortages

Submitters were concerned about volunteer shortages, with 41 submitters agreeing that this was an issue. The issues raised included demographic changes such as people commuting during the daytime and an ageing volunteer workforce. Other submitters focused on pressures on volunteers, such as constraints on their time, additional training requirements and attending non-fire incidents.

#### Other problems raised

Submitters also agreed there were challenges to be efficient (18 submitters), mixed or unclear responsibilities (16 submitters) and health and safety concerns (13 submitters). A number of submitters made other comments, including general agreement (19 submitters) or disagreement (seven submitters) with the problems set out in the discussion document. Ten submitters also raised the current legislation as a problem.

#### Disagreement with the problems

A relatively small number of submitters disagreed that a particular problem was in fact a problem for the fire services, or submitted that it was not a problem that they experienced in their area. For example, while 86 submitters considered that a lack of coordination and/or variable leadership was a problem, 12 submitters considered that it was not.

## Governance and support options

### Governance and support themes

In the discussion document, submitters were asked about their views on the advantages and disadvantages of the governance and support options. This provided us with a wide range of opinions and views about how the options could work, which did not necessarily match submitters’ selection for one of the options. From reading and analysing the submissions, it became clear that there were five key themes. These five themes and an overview of how the Department has interpreted submitters’ comments about those themes are provided below. The themes indicate the areas that need to be focused on when considering any changes to the fire services.

#### Theme 1: Volunteers

Volunteers and how to best support them was the topic most frequently mentioned by submitters. This included comments on how to better support volunteers through improved training and equipment. Submitters also commented on providing management support, and how to ensure the sustainability of volunteering in the fire services by providing opportunities and incentives. Forty submitters made specific suggestions on possible incentives for volunteers, including a rebate on the fire service levy, reimbursement of expenses and remuneration for loss of earnings. Some submitters also considered that employers of volunteers should be able to claim the cost of an employee attending an incident.

Submitters also highlighted the risks of the different options for volunteers, with some emphasising the need to preserve volunteers’ independence and to consider the impact of changes such as attending rural fires, non-fire incidents and the integration of the paid and volunteer workforce. Submitters had varying views on which option would provide the best support for volunteers.

#### Theme 2: Effective service delivery

Many submitters commented on how the fire services could provide more effective service delivery. These comments related to improving the national data, policies, resources and training, and providing greater clarity and flexibility about who is responsible for what, including the delivery of non-fire activities. It also includes comments about powers such as issuing fire permits and offences under the fire services legislation.

This theme also discusses rural fire because submitters wanted recognition of the differences between rural fire delivery and urban in a new model. They were concerned that the specialist skills, people and equipment required for rural fire would be lost in a national model. Suggestions to allow for these differences included keeping separate rural and urban arms in a new organisation, maintaining the current ERFD model or ensuring that the specialisation required for rural fire was recognised and provided for. How to improve the efficiency of the fire services is also discussed under this theme, with submitters commenting on the advantages and disadvantages of developing smaller or larger organisations.

#### Theme 3: Community involvement

Ensuring that communities remain involved in the operation of the fire services under a new model was the third most common theme among submissions on the governance and support options. These comments focused on keeping local control of fire services and how this could be achieved under the different options. Some submitters considered the fire services moving to a decentralised regional model, for example, having regional governance with national coordination, or continuing the ERFD model (and potentially applying it to urban fire services).

Comments about community involvement emphasised the importance of the local identities of brigades and their connection with the community. Some submitters made suggestions about how communities could be involved, including having communities elect a regional or local governance body, having advisory committees or having community boards with input into the national organisation.

#### Theme 4: Transition

Transitioning into a new model was a key theme throughout submissions. These comments focused on people’s appetite for change, what a comfortable size of change would be and how to minimise disruption to the fire services.

Submitters also discussed the current cultural differences that exist in the fire services - between rural and urban fire services, and between volunteer and paid fire services. They emphasised that these differences needed to be recognised and addressed, particularly if the fire services were to become one national organisation. Submitters made suggestions about how to help with this transition and address these cultural differences, including undertaking further consultation, considering the impact of the change on volunteers, and recognising the rural and local nature of the delivery of the fire services.

#### Theme 5: Funding purposes and principles

How funding was allocated and who should fund the fire services were issues raised by many submitters, including discussions about funding for rural fire and who should be involved with this. This section of the report does not consider the source of funding for the Commission as this issue is addressed in the ‘Funding of the Commission’ section on page 65.

### Submitters’ support for the governance and support options

The discussion document set out three possible options for governance and support of the fire services:

* Option 1 – enhanced status quo, which would implement the Government’s response to the 2012 Report of the Fire Review Panel (the Swain Report), including more support for volunteers, clarifying the mandate and continuing voluntary amalgamation of ERFDs;
* Option 2 – coordinated service delivery, which would provide coordinated national support for all volunteers and clearer leadership and governance, while keeping NZFS delivering urban fire services, and Rural Fire Authorities delivering rural fire services; and
* Option 3, one national fire service, which would create a new national organisation made up of both rural and urban fire, delivering fire services as required in the community.

Submitters were able to choose one of those options, or an ‘other’ option, which could include a mix of the options.

Although one option was selected by many submitters, this was often conditional support. For example, a submitter might have selected Option 3 but only if there was strong regional involvement or control. The figures below show all submitters’ option selection (figure 2), all organisations’ option selection (figure 3) and individuals’ option selection (figure 4).[[1]](#footnote-1)

**Figure 2:** Submitters’ support of governance and support options

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| **Figure 3:** Organisations’support of governance and support options   |  | | --- | |  | | **Figure 4:** Individuals’support of governance and support options   |  | | --- | |  | |

#### Submitters’ support of an ‘other’ option

Figure 2 shows submitters’ support for the three options in the discussion document. It also shows the percentage of submitters who made no selection or selected an ‘other option’. The Department has analysed the ‘other’ options and categorised them as submissions that either:

* preferred Option 1 but with compulsory ERFDs for example, or a mix of Options 1 and 2 (15 submitters);
* preferred a mix of Options 2 and 3 (22 submitters);
* made a submission based on the outcomes or principles they would like to see in any changes to the fire services (19 submitters); or
* suggested a step change through different options, with the goal of moving eventually to Option 3 (six submitters).

#### Submitters’ support of the options by submitter type

More submitters supported Option 3 (81 submitters) than supported any other single option. Those that selected Option 3 included 21 of the 42 local authorities that made submissions and four of the 11 ERFDs, as well as the ERFD Chairs’ Group. Two of the three emergency services organisations also selected this option. The Professional Firefighters Union and the New Zealand Executive Fire Officers Society also supported Option 3, as did nine of the rural fire forces.

The next most supported option was an ‘other’ option with 62 submitters. Fourteen of the local authorities selected this option with five seeking a mix of Options 1 and 2 and five seeking a mix of Options 2 and 3. The six ERFDs who selected ‘other’ did so because they were interested in a bigger Option 1 (one ERFD), a mix of options 2 and 3 (three ERFDs) or they thought that any change should be guided by outcomes or principles such as the involvement of the local community (two ERFDs).

Eight of the 11 submitters associated with the forestry sector selected ‘other’. Two were interested in a bigger Option 1, two in a mix of Options 2 and 3, and four focused on the outcomes or principles. Local Government New Zealand (LGNZ) and the UFBA also supported an ‘other’ option, because they thought the option selection should focus on the outcomes or principles.

Twenty-seven submitters supported Option 2, with four local authorities, two ERFDs, Federated Farmers of New Zealand (Federated Farmers) and one forestry organisation supporting this option. The main reason for submitters choosing Option 2 was because it delivers the benefit of some integration while retaining the separation of rural and urban fire services.

Twenty-one submitters supported Option 1, which included one local authority, one farming organisation and one forestry organisation.

Forty-four submitters also made ‘no selection’, in most cases this was because they were only commenting on the funding options.

Submitters’ support of the governance and support options based on their organisation is shown in Figure 5 below. Individuals are not included in the graph, to provide a clearer overview of the organisations’ option selection. Amongst the individuals: nine selected Option 1, seven selected Option 2, 31 selected option 3, 17 ‘other’ and 15 made no selection.

Figure : Submitters’ support of governance and support option by organisation type



#### Scale of change

Considering the support for the three options or ‘other’ option, it is clear that submitters were interested in:

* a small change: the 21 submitters (11 per cent)[[2]](#footnote-2) who selected Option 1; or
* a medium change: 42 submitters (22 per cent) – made up of the 27 submitters who selected Option 2 and the 15 submitters who selected ‘other’ options, which involved a bigger change than Option 1; or
* a large change: 109 submitters (57 per cent) – made up of the 81 submitters who selected Option 3 and the 28 submitters who selected ‘other’ options that involved a mix of Options 2 and 3, or an option that stepped through the changes from Option 1 to Option 3.

In addition, 19 submitters (10 per cent) selected ‘other’ options that focused on the outcomes or principles sought. The options in these submissions ranged from small to a large change.

## Funding of the Commission

### Funding the Commission themes

The two funding options presented in the discussion document were:

* Funding Option 1: Enhanced Status Quo, which set out options to improve the insurance-based levy; and
* Funding Option 2: Mixed Funding Model, which included the options to improve the insurance-based levy, proposed removing levy from vehicle insurance to other vehicle contribution methods and proposed a Crown contribution to help fund non-fire responses undertaken by the fire services.

#### Fairness of the options and free riders

Comments on the funding options are arranged into two sections: themes and how the funding options could work in practice. In the themes section, many submitters were interested in the comparative fairness of the options and how the funding options addressed the issue of free riding.[[3]](#footnote-3) Two particular areas of concern were non-insurance and under-insurance (including of government-owned property) and non-insurance of motor vehicles. Funding Option 2 was seen by a number of submitters as providing a wider variety of funding sources, which helped to mitigate free riding.

#### Reflecting the range of activities

Some submitters were also concerned that the source of funding, being fire insurance, did not reflect the range of activities undertaken by the Commission. Forty-one submitters considered that Funding Option 2 would better reflect the range of activities. Others were concerned about whether the funding would be sustainable and sufficient. Practical matters raised by submitters related primarily to the simplicity and ease of administration of the funding options.

#### How the options could work in practice

The submissions also considered how the options could work in practice. These related to implementing a new insurance levy, how a government contribution could work and how motor vehicle related incidents should be funded.

A number of submitters were interested in whether there should be a cap on the Commission’s fire service levy. Most agreed that there should be a cap on residential property, particularly as the cost of providing the service is generally the same at different residential properties. Submitters discussed whether the levy should be calculated on insurance premiums, which could potentially provide for risk-based levying, or on the sum insured, which was seen as more stable, simple and certain. Submissions also discussed whether the levy should be a fixed or variable rate. A variable rate was generally seen as too complex, although submitters stated a potential benefit of a variable rate was that it could reflect risk, the cost of providing services, and the frequency of use.

Submissions considered the type of insurance contract that should be subject to the levy – whether it should remain based on fire risk, or should be extended to include material damage contracts. Submissions also looked at whether the levy should remain on all property, or be limited to buildings. There was also some discussion of the current exemptions. Finally, submissions from insurers and brokers provided some detailed submissions on how the administrative aspects of the levy system could be simplified and made fairer.

A number of submitters considered the issues around a government contribution, under Funding Option 2. There was some support for a government contribution for incidents where the fire services supported the Police and ambulances. Other submitters were interested in a government contribution to reflect the under-insurance of government property. Submitters also provided various options for funding medical callouts, primarily from the Ministry of Health or ACC.

Funding for motor vehicle incidents was also discussed. A levy on annual vehicle licensing was seen by some submitters as capturing more motor vehicles than an insurance-based levy, while being relatively simple to collect. The other main option was road tax revenue, which was again seen as capturing more motor vehicles than an insurance-based levy.

### Submitters’ support for the funding options

There was reasonably strong support for changing the funding of the Commission, with 57 per cent of submitters choosing Funding Option 2 or an ‘other’ Option as their preferred option. A significant feature of submissions was their interest in either rates or general taxation as funding sources, even though the discussion document had rejected these options.

Figure 6: Submitters’ support of funding options



As the chart above shows, more submitters supported Funding Option 2 than any other option, at 44 per cent (105 submitters). It is important to note that 21 of the submitters who selected Funding Option 2 would have preferred the Commission to be funded through other means if those options were available. Of those 21 submitters, 12 would have preferred the Commission was funded by general tax, seven would have selected rates and two submitters would have selected a combination of the two.

The next most popular funding option was ‘other’ at 13 per cent (30 submitters). The other funding options that submitters selected included a combination of the funding options from the discussion document (22 submitters), rates (three submitters), general tax (three submitters) or an emergency services levy (two submitters).

A large number of submitters did not select or make distinctive comments on the funding options at 41 per cent (95 submitters). These submitters either mainly commented on the governance and support options, or made statements that the funding system should be fair and equitable but did not provide any preference on how this should be achieved.

#### Submitters’ support of the options by submitter type

Most of the 105 submitters that supported Funding Option 2 were individuals (37 submitters), followed by local authorities (22 submitters), other organisations (12 submitters) and rural fire forces (nine submitters). Six of the seven insurance organisations that made submissions also supported this option. Five of the 11 forestry organisations that made a submission supported an ‘other’ option.

# Introduction

## Summary of submissions received on the discussion document

This report summarises the 235 submissions that the Department received on the discussion document that was released on 27 May 2015. The discussion document and other information can be found at [www.dia.govt.nz/fire-services-review](http://www.dia.govt.nz/fire-services-review).

The discussion document set out three possible options for governance and support of the fire services:

* Option 1 – enhanced status quo, which would implement the Government’s response to the Swain Report, including more support for volunteers, clarifying the mandate and continuing voluntary amalgamation of ERFDs;
* Option 2 – coordinated service delivery, which would provide coordinated national support for all volunteers and clearer leadership and governance, while keeping NZFS delivering urban fire services, and Rural Fire Authorities delivering rural fire services; and
* Option 3, one national fire service, which would create a new national organisation made up of both rural and urban fire, delivering fire services as required in the community.

The discussion document also set out two funding options for funding the Commission:

* Funding Option 1: Enhanced Status Quo, which set out options to improve the insurance-based levy; and
* Funding Option 2: Mixed Funding Model, which included the options to improve the insurance-based levy, proposed removing levy from vehicle insurance to other vehicle contribution methods and proposed a Crown contribution to help fund non-fire responses undertaken by the fire services.

The report is structured by first providing an overview of the submitters that expressed their opinions in this process. The current state is then explained, to reflect submitters’ views on what is working well with the fire services and what are the current problems and consequences that need to be addressed. Submitters’ preferences for the governance and support options are presented according to the themes that submitters raised in their submissions.

These themes emphasise the areas that need to be focused on when considering any changes to the fire services and include:

* supporting volunteers;
* the effectiveness of service delivery;
* close engagement with communities;
* transition processes; and
* funding purposes and principles.

Support for the options for funding the Commission is similarly presented, with an analysis of the key themes of:

* fairness;
* reducing free riding;
* reflecting the range of activities that the fire services provides;
* providing sufficient and sustainable funding; and
* information about practical matters that the funding options need to provide for.

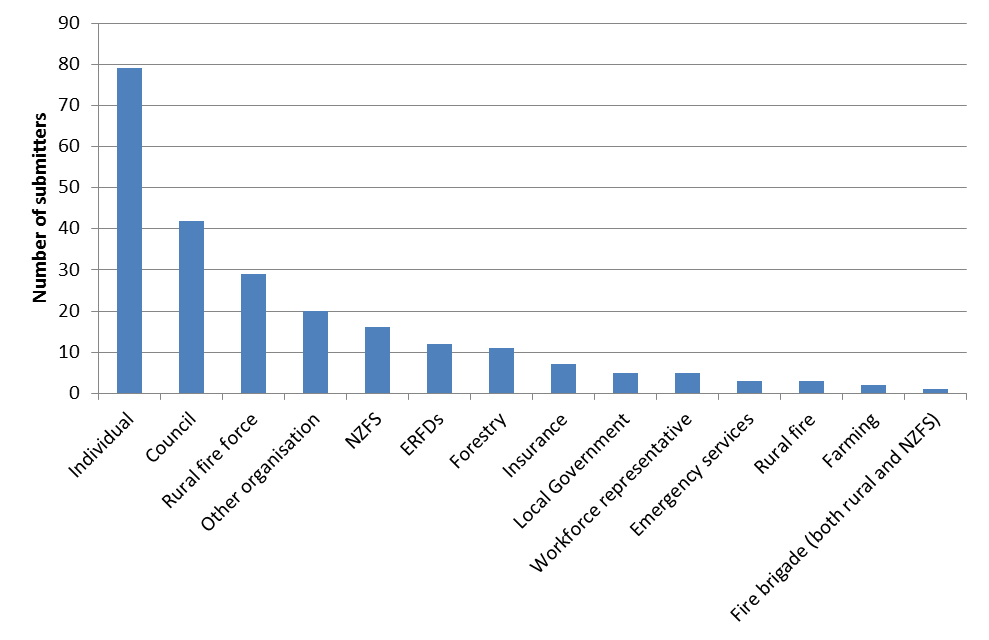
The submitters

The Department received 235 submissions. Many of the submissions came from organisations that represented a large membership. A list of submitters and details about their organisations is provided in Appendix Two. Organisations are mentioned and quoted throughout the report where they have supported a particular view.

### Submitter by type

The graph below shows the submitters by submitter type. The types are defined by the industry they are involved with or their organisation group, and individuals are listed as their own submitter type.

**Figure 7:** Submitters by organisation



Five workforce representative organisations made submissions. These were the UFBA, Forest and Rural Fire Association of New Zealand, the Professional Firefighters Union, the New Zealand Executive Fire Officers Society and the Auckland Provincial Fire Brigades’ Association.

The UFBA sent a survey regarding the discussion document to the approximately 10,000 firefighters that it represents and received responses from 650 of them. The UFBA membership consists of volunteer, paid, urban, rural, industrial, and defence brigades, with 80 per cent being volunteers. This means that a large proportion of the workforce is represented through this one submission and should be considered when the UFBA submission is referred to in the report.

A large number of submissions came from the rural fire sector with 104 submissions from local government, ERFDs, rural fire forces and organisations from the forestry and farming sector.[[4]](#footnote-4) Local authorities were the largest group with 42 submissions. Local authorities are involved in rural fire either as a Rural Fire Authority or as a stakeholder in an ERFD. Five local government organisations also made submissions which included LGNZ, which represents the national interests of local authorities in New Zealand.

Eleven of the 12 ERFDs made a submission, as did the ERFD Chairs’ Group, which represents the interests of ERFDs. ERFDs deliver rural fire for 70 per cent of the country by area. Twenty-nine volunteer rural fire forces made submissions and three submissions came from other rural fire organisations such as Rural Fire Committees and the Rural Fire Network. Eleven organisations that are involved with the forestry sector made submissions including the Forest Owners’ Association and the New Zealand Farm Forestry Association. Two submissions also came from the farming sector; one of those submitters was Federated Farmers.

Fifteen submissions were received from volunteer NZFS brigades and there was two joint submissions from a volunteer NZFS brigade and a volunteer rural fire force. The number of submissions should be considered in the context of the UFBA submission and the brigades that it represents.

Twenty submissions also came from ‘other organisations’ such as residents associations, a research organisation, museums and electricity associations. Three submissions were received from emergency services such as ambulance and rescue services, and seven submissions from organisations associated with the insurance industry.

The majority of other submissions came from individuals with 79 submissions. Most of those individuals identified as firefighters and many had a long history either working or volunteering with the fire services, with current and former Principal Rural Fire Officers, Rural Fire Officers and Chief Fire Officers, forestry sector employees, a former Area Commander and other management in the NZFS, a former President of the UFBA, and a former National Rural Fire Officer. A number of individuals had worked or volunteered both for NZFS and for rural fire services.

Government agencies with an interest in fire services or a role in delivering fire services, such as the Department of Conservation, did not make submissions on the discussion document because they have been involved in the policy development process with the Fire Services Review Team. A list of all government agencies that are involved with the review can be found at Appendix One.

### Submitter type by self-selection

In the discussion document question form, submitters were asked to select what groups they identified with. Many submitters selected multiple groups, with some selecting all of them. The graph below shows the submitter type by this self-selection, which includes a total of 550 selections. This does not necessarily reflect a submitter type because, for example, 63 submitters identified with a local authority but only 42 submissions came from local authorities.

This information is included, however, to provide a deeper understanding of submitters’ involvement in the fire services, in particular for the 79 individuals who made submissions. Many of the individuals are either currently or formerly involved with the fire services and are involved in multiple areas such as rural, urban, volunteering and emergency services. The graph below helps capture the range of services that these individuals may be involved in. It also helps to capture the range of services that organisations may be involved with. For example, the UFBA represents volunteers and paid staff in both the rural and urban fire services.

**Figure 8:** Submitter type by self-selection

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Information meetings

During the consultation period (27 May to 10 July), the Minister of Internal Affairs, Hon Peter Dunne (the Minister) and the Associate Minister of Local Government, Hon Louise Upston and the review project team visited a number of regions. These meetings are listed in Appendix Three along with a summary of the discussions from those meetings. A list of stakeholders that the Department engaged with during that time is also provided at Appendix Four.

# Current state of the fire services

The first two questions in the discussion document asked submitters about what was currently working well with the fire services and whether the discussion document had correctly identified the problems and their consequences.

## Areas that are working well

As the table below shows, many submitters identified the areas that they considered are currently working well in the fire services.

Figure : Number of submitters commenting on areas that are working well



### Team work

One hundred and eighteen submitters commented on this area. Forty-three submitters commented on the strong coordination between different organisations involved in fire from the NZFS, Rural Fire Authorities, volunteers, industrial brigades and other emergency services.

Thirty-two submitters recognised the important role that volunteers played both in the delivery of fire services and their support for communities. Volunteers commit their time and attend a wide range of incidents, with Auckland Provincial Fire Brigades’ Association saying in its submission:

By all accounts you have the most valued, honest, reliable, trustworthy, dedicated and largest group of volunteers in the country, at the moment.

Ten submitters referred positively to workforce support roles, seeing them as an essential link between local brigade activity and NZFS. Six submitters referred favourably to the camaraderie or positive culture of fire services, and four other submitters referred positively to local or brigade leadership.

### Rural fire services

Eighty-nine submitters commented on areas that were currently working well in rural fire. There was strong support of the ERFD model, with 27 submitters commenting on this, and 13 submissions mentioning the Otago Enlarged Rural Fire District as a successful example.

Thirteen submitters commented on the fact that rural fire works well, and five submitters commented on the important role rural firefighters play in their communities. Eight submitters considered that the structure of rural fire was working well and that communities received a good service. Three submitters considered that local knowledge or the autonomy of rural fire forces was important. Five submitters also supported the separation of roles and skills in rural and urban fires services.

Three submitters commented on the positive influence of setting up the National Rural Fire Authority (NRFA), with two submitters saying that it increased leadership and expertise across the sector. Two other submitters supported the expansion of the NRFA role as a strong and independent entity and believe this same approach should be applied to all aspects of the fire services.

### Structures and processes

Seven submitters stated that the current structure allowed fire services to work closely with communities and other stakeholders, with three submitters noting that communities and stakeholders can take ownership of fire risks in their communities. One submitter supported the current model of the combined National Commander and Chief Executive Officer, and another submitter supported the regional management balance that currently exists within NZFS.

Six submitters thought that volunteer brigades having service agreements with the Commission worked well, with three others noting the importance of the brigades’ independence. Submissions supported recent changes, including the recent operational reviews (two submitters), and improved services and training following the roll out of Vision 2020 (two submitters).

### Emergency services coordination

Thirteen submitters pointed to a positive relationship between the different emergency services, including rural and urban fire services, and ambulance services. In particular, a submission from Wellington Free Ambulance, St John Ambulance and Ambulance New Zealand recognised the strong relationship they had with NZFS, and the valuable services NZFS provides outside of fighting fires.

### Urban fire services

Eighteen submitters commented on this area, with three submitters describing urban fire brigades (in particular, volunteer brigades) as professional. One submitter described the urban structure and leadership model as “strong”, and three submitters also commented positively on NZFS’ training. Four submitters commented on various NZFS roles, including urban search and rescue (USAR) and contributions to disaster preparedness, response and recovery.

### Specific functions

Fourteen submitters commented on this area, with four submitters referring to safety and fire risk reduction or management as working well. Three submitters referred to the importance of research, including on rural fire and community engagement. Other specific functions that were working well included NZFS’ response to medical calls and rural fire’s ‘first response’ function and its performance in the area of civil defence.

### Equipment, training and resources

Fourteen submitters commented on this area, with four submitters referring to either having good quality Personal Protective Equipment (PPE), or that the improvements to PPE were going well. Four submitters commented positively on the Hawkes Bay area, including the provision of equipment, training and vehicles. Six submitters in various ERFDs (Otago, Wairarapa, Marlborough and Auckland) referred positively to their equipment and training.

## 1.2 Problems and consequences

While recognising that many areas are working well in the fire services, most submitters also agreed that there were problems and consequences to be addressed (see the table below). Some submitters commented that these were not issues in their region.

Figure : Number of submitters commenting on problems and consequences



### Changing expectations

One hundred submitters agreed that changing expectations was a core problem for the review, with 37 of those submitters commenting on the need to update the non-fire mandate. Twenty-four submitters were concerned that firefighters were responding to more non-fire incidents, despite not having the legal authority, training or resourcing to undertake these tasks. These submitters also commented on land use changes, with more subdivisions, and the development of more industries and infrastructure. Extra training, health and safety and compliance requirements were raised as issues by 13 submitters. Six other submitters stated that the public expects the same level of service from any firefighter, regardless of whether they are urban, rural, paid or volunteer.

Three submitters did not agree that changing expectations was a problem but more a reality of working on the fire services, and that this was more to do with the lack of a mandate rather than changing expectations.

### Challenges to support workforce

Ninety-three submitters agreed that there were challenges to support the workforce, with 33 submitters commenting on challenges to support volunteers. Many submitters talked about the need for better retention and recruitment, including seeking more women volunteers. One submitter said that the barriers that exist between the rural and urban brigades discourage volunteers, and another that volunteers have to currently choose between rural and urban. Both Rural Fire Authorities and NZFS were cited as not being supportive enough of volunteers.

Training was mentioned in 18 submissions, with submitters saying that inadequate training is a problem across rural and urban workforces. One submitter considered that Rural Fire Officers are spread too thinly to be able to focus on training for their workforce, and another that national trainers should be able to conduct training locally. Submitters said that the high level of training required and extra administrative requirements may be deterring volunteers. One submitter said training is too academic, and not practical enough. There are also inefficiencies in the training regimes, with people having to repeat training unnecessarily because it has not been recorded.

Nine submissions talked about the pressure on volunteers’ time, particularly the pressure of having to attend non-fire incidents and training, which also impacts on employers who may not continue releasing staff if the number of incidents keeps increasing. Many of these submissions said that the contribution of volunteers is undervalued and under resourced, with two submissions mentioning that volunteers needed the right equipment for the job.

Four submitters wrote that volunteers should be able to respond to a situation using their local knowledge, and should be “trusted” to act sensibly as a first responder. Volunteers should also be able to attend longer duration incidents to build up their skills and get experience, said two submitters. One submission said that volunteers should be allowed to take specialist roles, such as USAR, as many volunteers had trade skills which were applicable to the role.

A lack of investment in leadership and management was cited by seven submitters. Area managers were stretched too thin, and the resource for administration staff and volunteer support staff has decreased. In its submission, the Motunau Rural Fire Force said that:

Under-funding leads to rundown units and morale.

Submitters said that an increasing mechanisation in forestry has meant that there is a smaller potential workforce to deal with fires. Three submitters also mentioned concerns at the loss of capacity and capability in the Department of Conservation to assist in fire services. The introduction of ERFDs with full-time employees had also led to loss of part-time rural employees and their experience.

Several submissions mentioned cumbersome recruitment processes for paid firefighters. Lack of support for paid firefighters was also an issue with one submitter saying that critical incident support for paid firefighters had been systematically downgraded over the years.

### Challenges to be effective

Ninety submitters agreed that there were challenges to be effective, with 30 submitters commenting on the differences between rural and urban fire, the lack of integration, barriers, and attitudes as reasons for this. Submitters also noted that the distinction between urban and rural fire fighting was artificial with the exception of vegetation fires, and that the “us and them” attitude hinders effective working relationships.

Three submissions commented on the effectiveness of the ERFDs, with one saying there was no evidence of any benefits. The lack of a national reporting system and therefore reliable fire data was commented on by 10 submitters, with the Electricity Networks Association saying:

Better and more efficient fire prevention should be an explicit goal of the reforms.

Under-resourcing was cited by 15 submitters. Concerns included a lack of investment in area management, in administration and in specialist technical support. The under-resourcing of USAR was mentioned by one submitter and the lack of funding for water flow testing was mentioned by another, with the Waikanae Volunteer Fire Brigade saying that:

The NZFS processes and IT systems are antiquated and misaligned with the needs of today’s administration requirements.

Funding concerns also lead into comments about staff needing the right gear for the job – boots, wet weather gear, vehicles, buildings, personal radios, etc. Another noted there should be consistent ways to report on things such as training and entering fire reports.

One submission noted that the challenges to effectiveness were not apparent in the rural and urban fire sectors in Hawkes Bay.

### Investment is inconsistent with community needs

Eighty-eight submitters agreed that investment was inconsistent with community needs. Twenty-three submitters agreed with this in general, and 32 submitters stated that this was an issue for rural fire in particular, because it was under-funded. The Greytown Volunteer Fire Brigade said that:

The main reason for this is the rural fire service is lagging behind that of our urban fire service. As a whole, rural fire seem underfunded and under resourced. Also with a large amount of equipment coming to end of life, it is extremely concerning that there is no real plan for its replacement.

Fourteen submitters said that this was a problem because there was not enough funding, or fire brigades were not resourced appropriately. Six other submitters commented on the potential for cost savings by combining stations and training opportunities.

Five submitters disagreed that this was a problem. Their reasons included that there was an incorrect understanding of the issue in the discussion document or that this was not an issue in their region.

### Lack of coordination and variable leadership

Eighty-six submitters agreed that there was a lack of coordination and variable leadership in the fire services. Twenty-nine of those submitters made general comments about the issue, saying that the system works despite itself. In its submission, the UFBA said that the reform outlined in the Swain report still needed to be progressed. LGNZ in its submission said that:

As we note effective leadership is not something that we can guarantee through the re-design of our institutions however leadership can be enhanced if there is clarity about roles and accountability. LGNZ believes that improving clarity of roles is an important objective for the review.

Twenty-five submitters specifically commented on the separation between urban and rural being a barrier to better coordination, with one submitter mentioning that this led to command and control issues at vegetation fires. Six other submitters also commented on the replication in the rural fire sector, with too many Rural Fire Authorities.

Eight submitters emphasised the mixed leadership across the services commenting on the lack of a succession strategy, and a lack of focus on volunteers amongst management. Three others commented on the lack of national leadership and support from the national organisations, in particular from the NRFA.

Twelve submitters agreed that this was a problem, but not in their area or only partially agreed with this as an issue. This was mainly because coordination was working well and management was effective, such as in Otago after the establishment of the ERFD.

### Volunteer shortages

Forty-one submitters agreed that volunteer shortages is an issue, with 13 submitters stating that there is little current understanding of the needs and aspirations of volunteers. They also commented that it was hard to get volunteers for the day-time shifts. Issues with sustainability raised by submitters included an ageing volunteer workforce (nine submitters), constraints on volunteers’ time (six submitters), additional training and health and safety requirements (five submitters) and that it was harder to get volunteers in small rural towns (five submitters). In its submission, the UFBA said that:

Fewer New Zealanders are volunteering within their communities. Rural communities are shrinking and their populations are ageing. In many areas there are few people available to help in an emergency response. As a result, local fire services are under pressure to assist in a much broader range of emergency situations.

Other comments included that having to attend non-fire incidents was putting extra pressure on volunteers (two submitters) and that there was limited flexibility for volunteers (two submitters).

### Issues with the fire service levy

Twenty-six submitters raised issues with the fire service levy. Sixteen emphasised that the current system was inequitable with stakeholders involved in rural fire, such as forest owners paying multiple times for fire services. Other issues raised by submitters included that the current funding of the fire services does not match the activities that the funding is used for (five submitters), that the levy is confusing and difficult to calculate (two submitters) and does not reflect the risk (one submitter). One other submitter, the New Zealand Taxpayers Union, also stated that there was no funding crisis for the fire services.

### Challenges to be efficient

Eighteen submitters agreed that the fire services faced challenges to be efficient, with most attributing this to the cross overs with the urban and rural fire sectors (seven submitters). Other causes of inefficiencies included having too many stations and not consolidating training opportunities, which meant that the fire services were not achieving economies of scale. Legislation was also stated as a cause of inefficiency (two submitters) and emergency services developing processes in isolation from each other (one submitter).

### Mixed or unclear responsibilities

Sixteen submitters commented on mixed or unclear responsibilities as a problem. The split between rural and urban fire was identified as the cause of this problem by 10 of those submitters, citing close boundaries, confusing legislation and a lack of cohesion between the services as issues. Seven other submitters mentioned that there were unclear responsibilities because there was no clear mandate for the delivery of non-fire services, even though call outs for these incidents were increasing.

### Health and safety

Thirteen submitters raised concerns with health and safety. Training was a common theme in the submissions, with one submitter saying there must be consistent training and resourcing for both urban and rural services, in things such as specialist motor vehicle accident training. It was unfair to expect rural fire services to respond to such incidents without the same level of training and equipment as other brigades. Electricity Networks Authority wrote of their frustrations at getting fire services to undertake training to the required level saying that:

Some ENA members are seriously concerned about the safety risks.

One submission discussed the difficulty of firefighters complying with guidelines or standards set by other organisations, for example, when a firefighter performs a medical practice. Three submitters commented that the statistics in Appendix C of the discussion document were misleading and incomplete, as the appendix only discussed rural fire statistics. One submitter said there had been a far greater number of urban fire-related deaths.

### Other

Fifty-three submitters made other comments regarding the problems and consequences. Nineteen of those submitters agreed that the discussion document had identified the problems. On the other hand seven disagreed and said that the problems were either flawed, the wrong problems or that there were no problems. Two submitters emphasised that the problems were not in their region. Three submitters, including LGNZ, broadly agreed with the problems in the discussion document, but did not believe that they provide the grounds for a significant review.

Legislation was cited as a problem by 10 submitters, with issues such as firefighters not being covered for liability at an emergency and the complexity or rural fire funding. One submitter, the Energy Trusts of New Zealand, raised the issue that:

From an electricity industry perspective, the proximity of trees and power lines throughout New Zealand is one of the largest fire risk factors not being adequately addressed under current legislative arrangements.

# 2. Governance and support options

After considering what is working well and what are the current problems and consequences for the fire services, submitters were asked to consider three governance and support options. The questions in the discussion document asked submitters to outline the advantages and disadvantages of the different options and provide some details about how they thought the options could be implemented.

This part of the report is split into two parts:

* governance and support themes; and
* governance and support option selection.

The first part focuses on the key themes that came through in people’s submissions, to highlight what is important to consider in any future changes. The second part provides more information on the number of submitters who selected each option.

## 2.1 Theme one: Volunteers

‘Volunteers’ was the topic discussed by the most submitters (see the table below). Comments focused on the need to provide greater support, opportunities and incentives for volunteers, and to maintain their independence. Each section provides an overview of comments on the topic, the impact of the governance options on that topic, and how it could be improved.

Figure : Number of comments on volunteer themes in submissions[[5]](#footnote-5)



### Volunteer support from options

Many submitters commented on the support for volunteers, focusing on training, equipment, management support, incentives, volunteering opportunities and health and safety.

Submitters were mixed on whether Option 1 would provide good support, with submitters not clear on how support would be provided or concerned that inconsistent support for volunteers could continue. Twenty submitters, including local authorities and firefighters, considered that Option 2 provided good support for volunteers, although two others considered that Option 2 did not provide enough details. The Maramarua Volunteer Fire Force was concerned about Option 2:

In this option rural volunteers are still seen as different from NZFS volunteers…All volunteers, rural or urban should be treated equally, a continuation of a two tiered volunteer network is not a sustainable long term option. As a society volunteers are getting harder to source for any organisation, everything must be done to attract and support people. Lack of volunteers is the biggest threat to the ongoing viability for a new fire service.

Eight submitters, including local authorities, were satisfied with the support that volunteers would receive under Option 3, with four submitters considering that Option 3 would provide rural and urban volunteers with equal status and treatment, and one submitter that it would provide equal treatment for paid and volunteer staff.

#### Training volunteers

Issues with training related to consistency of training, without imposing excessive training requirements on volunteers. One submitter considered that Option 1 would provide good training to volunteers, while another four submitters considered that it did not, or that training would be inconsistent across the country. Seven submitters, including brigades and firefighters, considered that Option 2 would provide better training for volunteers, although another five submitters were concerned about the levels of training that could be imposed on rural volunteers under Option 2.

Twenty submitters, including local authorities and brigades, considered that training would improve under Option 3, with submitters seeing training becoming more consistent across the country and moving from a “one size fits all” approach. However, another seven submitters were concerned that a NZFS style of training would be imposed on the rural environment, which could be regimented and would exceed requirements. As one rural volunteer firefighter put it:

There is a common fear amongst rural volunteers in our area that if we come under the fire service, the standard volunteer training commitments will be forced upon us. The level of response, frequency of response and nature of response should be taken into consideration in determining the training requirements.

Twenty-two submitters, including rural fire stakeholders, and rural and urban volunteer brigades and forces, made suggestions about to how to improve the provision of training. The majority of those submitters emphasised that training needs to be fit for purpose, funded and to take into account previous experiences. In its submission, the Forest and Rural Fire Association of New Zealand Management Committee said that:

Many commented that they feared being “loaded up” with extra compliance and paperwork with some quoting the requirements being asked of Fire Service Brigades as being too onerous.

Four submitters said that standardising and integrating the training could help with this, while four other submitters said that providing training locally and being flexible about when it would occur would also help.

#### Equipping volunteers

One submitter considered that Option 1 did not provide for equipping volunteers and two submitters felt that under Option 2, NZFS equipping standards may be imposed unnecessarily on rural fire. Six submitters, including brigades and local authorities, considered that better equipment would be provided to rural volunteers under Option 3, including equipment that is appropriate to the needs of the volunteers’ responses.

Twenty submitters, including volunteer brigades, local authorities and ERFDs, emphasised the need for volunteers to have adequate resourcing, funding and equipment, with many saying that this was not currently sufficient. One submitter said it should be the same as career firefighters. In their submissions, both the Auckland Rural Fire Authority and Rayonier Matariki Forests said that:

Ongoing resourcing is critical to support volunteers. This support requires more than just funding rural fire authorities but would also include more tangible areas including, recruitment, retention, administration, training, equipment maintenance, professional development and employer support.

#### Management and administrative support

Four submitters supported an increase in Volunteer Support Officers for urban volunteers under Option 2, as long as it did not lead to management interference in brigades. Two of those submitters, the Gore Volunteer Fire Brigade and a volunteer firefighter, supported:

Increased numbers of Volunteer Support Officers working with brigades to enhance the service and assist to enable good leadership within the brigades and assist brigade capability to meet both NZFS and community outcomes.

Two submitters considered that Option 2 would provide more consistency in leadership and support. Three submitters supported the direct relationship between volunteers and the national fire service under Option 3. Three submitters considered that administrative support under Option 3 would allow volunteers to focus on training and response. Another submitter was concerned that Option 3 would increase bureaucracy for volunteers.

Seven submitters, including volunteer brigades and firefighters, emphasised the need to provide more Volunteer Support Officers or administrative support. These roles could help relieve some of the increasing paperwork for volunteers and ensure they were better supported to do their roles. One submitter also recommended the creation of a welfare officer role.

Four submitters commented on the Chief Fire Officer role. These views ranged from removing the role, to ensuring that the role was filled by volunteers. Two submitters, including the UFBA, supported the idea of having volunteer managers. Five submitters also mentioned building management capacity amongst volunteers and providing for their development.

#### Incentives and recognition for volunteers and employers

Three submitters were pleased that Option 2 would provide incentives for volunteers. Two submitters were pleased that Option 3 would offer incentives to volunteers. Three submitters supported incentives being provided to employers of volunteers under Option 2. Four submitters were pleased that Option 3 would provide employers of volunteers with incentives.

Forty submitters, including volunteer brigades and firefighters, commented on the incentives that could be offered to both volunteers and their employers, to relieve some of the pressure on their time and finances. Their suggestions included providing:

* remuneration for loss of earnings or an attendance fee for volunteers (11 submitters), although two submitters rejected this as a form of compensation;
* a rebate on the fire service levy for volunteers and/or their employers (12 submitters);
* a way for employers (or the self-employed) to claim the cost of the employee attending an incident, and employment protection for volunteers (five submitters);
* reimbursement of volunteers' expenses (three submitters);
* childcare assistance (two submitters);
* medical insurance (two submitters);
* retainers[[6]](#footnote-6) (two submitters thought this should be considered, although another submitter, the UFBA, did not support this model);
* tax relief (two submitters);
* ways to recognise and reward volunteers, including medals and honours or an identifier on their uniform (three submitters);
* protection from loss of income where physical or psychological injury is incurred while volunteering (one submitter);
* gratuities for both volunteers and employers (one submitter); and
* a special card for volunteers which will enable members to receive discounts on rates, insurance premiums and in various stores (one submitter).

Thirteen submitters welcomed official recognition of the importance of volunteers to the fire services. The UFBA in its submission suggested that there should be:

...formal recognition that 80% of the country’s fire services’ personnel resource is provided by volunteers. There should be a requirement in legislation for volunteer engagement and sustainability to be fostered and supported.

Two of those submitters also recognised the role that local agencies, including the local mayor, have in providing this recognition.

#### Volunteering opportunities

The Nelson City Council considered that Option 1 would provide opportunities for rural volunteers. Four other submitters, including rural volunteers, considered that Option 3 would provide opportunities for volunteers and increase the pool of volunteers.

The Rarangi Volunteer Fire Force submitted:

It is unfortunate that at present, volunteers have to choose between rural and urban, rather than one unified service. Being specialists within one body is far more desirable and widens the pool of experience in that body.

#### Dispute resolution

Six submitters wanted improved dispute resolution mechanisms, including an independent mediation service. Two of those submitters thought this could be achieved through a charter based on Australian models, with the UFBA in its submission stating that:

The UFBA submits that volunteers need separate, independent representation when in dispute with their fire services. Volunteers are not employees and cannot be incentivised or sanctioned in the same way as employees.

#### Sustainability

Sustainability (the recruitment and retention of volunteers) was considered important by a number of submitters. Submitters, including firefighters, volunteer brigades and local authorities, were mixed on whether any of the options would provide for the sustainability of the volunteer base.

To improve volunteer sustainability, one submitter said to emphasise volunteerism as a pathway to career positions and wondered about getting youth on the unemployment benefit to become a fire volunteer. Another submitter said to target women as they were under-represented.

#### Health and safety

One submitter considered that Option 1 would support health and safety for volunteers. Three other submitters considered that Option 2 would support health and safety for volunteers.

### Independence of volunteers

A number of submitters were interested in maintaining the independence of volunteers and volunteer brigades, and the close connections of volunteers to their communities. Two submitters considered that Option 1 would allow volunteers to stay closely connected to the rural areas they provide services to, and two submitters supported the continued autonomy of volunteer brigades under Option 2. As the Levin Rural Fire Force put it:

We keep our local identity and esprit d corps.

Another submitter considered that Option 2 allows brigades to be closely connected to the areas they serve. A submitter considered an ERFD model would keep the independence of the brigades and continue local best practice. Eleven submitters, including volunteer brigades and firefighters were concerned that Option 3 would undermine the independence of volunteers and brigades, including a loss of identity, loss of the community’s respect and loss of flexibility to meet personal or community needs.

Eight submitters supported bringing volunteers under a new national service because it would mean that all volunteers are treated equally, that volunteers would not have to choose between the two services, and they would have a direct relationship with the new organisation. In its submission the UFBA said that:

UFBA believes that these fire forces should be constituted as volunteer fire brigades under the Fire Service Act 1975 and receive the appropriate resourcing and support.

Eight submitters were keen to maintain the current structure of the brigades and in particular volunteers’ autonomy; four of those submitters were volunteer fire brigades or forces. The Auckland Provincial Fire Brigades’ Association commented that:

Volunteer brigades will lose their identity in their community and be driven by an organization that has not taken into consideration the culture of the volunteer brigades.

To improve this, another eight submitters thought that volunteers should be more involved in decision making, or have more influence or a voice in the operation of the fire services. One submitter thought that this should include volunteer representation on the board and/or executive team.

### Risk of change and volunteers

Submitters were concerned that various options might affect volunteers’ continued willingness to volunteer. Scion Research considered that all options could risk volunteers leaving the fire services. Another submitter was concerned that volunteers could leave if the fire services did not change.

Two submitters thought that Option 1 was less likely to lead to potential disengagement from volunteers, with another eight submitters considering that Options 2 or 3 presented a greater risk of volunteers leaving. Three submitters emphasised the need to carefully manage any transition to a national fire service and to take a cautious approach, with the risk that people may no longer wish to volunteer under such a model.

#### Other risks for volunteers

These submissions focused on impacts of change on volunteers’ time and uncertainty of change. One submitter noted that all options needed to recognise that volunteer time is limited.

Six submitters, including brigades and firefighters, were concerned that NZFS volunteers would be required under Option 3 to attend rural fires beyond the first hour. One submitter was concerned that more volunteers would have to attend extended wildfire incidents under Option 3, because current stakeholders would withdraw from services. Two other submitters were concerned that volunteers may spend extra time under Option 3 attending non-fire incidents.

Seven submitters, including brigades and firefighters, were concerned about the potential clash of cultures between career and volunteer firefighters under Option 3. In particular, submitters felt that career staff may try to run volunteer brigades, including pressuring volunteers to attend different types of incidents (other than fires). Another two submitters were concerned about the potential clash of cultures between rural and urban firefighters under Option 3.

## 2.2 Theme two: Effective service delivery

Many submitters commented on how the fire services could provide more effective service delivery, considering the options in the discussion document and other models that the fire services could operate under in the future (see the table below).

Figure : Number of comments on effective service delivery themes



### Greater clarity in service delivery

#### The non-fire mandate

Forty-six submitters commented on how the options could provide the fire services, community groups and the public with better certainty about who responds to what incidents. One submitter, New Zealand Land Search and Rescue, emphasised that the fire services’ mandate to perform high angle and rope technical rescue and swift water rescue ‘assistance functions’, should be qualified with some provisions to ensure that it does not replicate the current functions that Land Search and Rescue performs. Five other submitters also questioned whether confirming the non-fire functions would create issues with some volunteers being required to do functions that they do not want to undertake.

#### National improvements

National improvements such as centralised systems, national standards, services, data and guidelines were expressed as benefits of many of the options, with twenty-six submitters commenting on this. This was raised by eight local authorities, four rural fire forces and the ERFD Chairs’ Group, who said:

Establishment of a national incident reporting system and national risk reduction model prior to implementation will be important.

#### Roles and responsibilities

Sixteen submitters stated that having clearer roles and responsibilities would be a benefit of the changes. Five submitters thought that this clarity could be best achieved through Option 1, three through Option 2 and eight submitters through Option 3. In each case, they wanted there to be clearer expectations on what incidents the fire service would respond to and the level of service delivery that would be provided. These submitters thought that this clarity would help the public understand the fire services’ roles and responsibilities and help with health and safety and accountability.

### Coordinated, consistent and flexible service delivery

Twenty-eight submitters wanted the fire services to be more coordinated, with the rivalry and barriers between urban and rural broken down and improved interactions with emergency services. This was often cited as a reason for preferring Options 2 and 3 rather than Option 1. Consistent service delivery was also important to 16 submitters, who thought that this would be achieved through either Options 2 or 3. Five submitters also recognised that more effective leadership was an advantage with all of the options.

Fifteen submitters also commented on more support for Rural Fire Authorities and for the Commission to have an increased focus on rural fire as benefits of Option 1 or 2. They supported the fact that expectations would be clearer and coordination would be improved, especially through the use of service delivery agreements under Option 2.

#### Emergency services’ interaction

Fifteen submitters suggested that all emergency services should be amalgamated, with the Wanganui District Council saying in their submission:

The Wanganui District Council also requests, and supports, that future consideration be given to the amalgamation of ‘One National Fire Service’ with other emergency services such as Ambulance, rescue helicopters, Coast Guard, Land Search and Rescue and potentially Civil Defence and Emergency Management.

Four other submitters supported improved coordination between fire services and emergency management. Some submitters provided examples of when this was working well because, for example, an ambulance is located at a fire station or when a trained St John ambulance officer rides on a fire truck. Four submitters also mentioned funding of the wider emergency services sector, with three submitters recommending the establishment of an Emergency Service Levy similar to Australia.

#### Flexibility for the future

Nine submitters commented on the need for the new fire services to have the flexibility to deliver fire services in the future and adapt to community needs. This was mentioned as either an advantage of Option 3 or a disadvantage of Option 1, with the Great Barrier Voluntary Rural Fire Force saying:

The new service should be able to adapt to changes in communities’ needs into the future.

On the other hand, two other submitters said that this flexibility is lost when going to a national model, as it can be hard to account for diverse expectations.

### Delivery of the 4Rs

Most submitters agreed that the 4Rs[[7]](#footnote-7) should be delivered by a local organisation; with two saying that it should be delivered by a rural regional body, and three submitters saying that ERFDs should be responsible for them. The Voluntary Rural Fire Forces of the Waimea Rural Fire District said that:

Rural fire is land management and requires specific local application of the 4Rs.

Four other submitters said that the 4Rs should be undertaken by the national, unified body.

### Resources and training

Thirty-one submitters discussed how resourcing, equipment and training could be improved with five submitters stating that was a benefit of Option 3. Six submitters thought that it would be easier to allocate and share resources across the fire services, although one submitter questioned who would be responsible for making these decisions and raised this as a disadvantage of Option 3.

Nineteen submitters commented on the type of training and allocation of resources and equipment that should occur under the new models. Seven submitters said that a national service should deliver consistent training and simplify and streamline access to resources. Five submitters emphasised that training still needs to be flexible to adapt for each force, their local conditions and volunteer needs. Three other submitters recommended that training should occur with both rural fire forces and urban brigades to help break down boundaries.

### Rural fire

Many submitters emphasised the need to recognise the difference between rural and urban fire services delivery. This was cited as the reason for agreeing or disagreeing with Options 2 or 3. This section discusses submitters’ views on why it is important to recognise the differences and outlines how this could occur under each of the options. It also discusses how current rural stakeholders could stay involved in rural fire.

Twenty-one submitters emphasised the need to recognise the difference between rural and urban fire service delivery, with many expressing this as the reason for supporting Option 2. Five of those submitters are involved in the forestry industry.

Six submitters emphasised the need to have a separate rural and urban arm of the fire services, with Forest Management (NZ) Limited saying that there needs to be a:

Separate structure for rural and urban firefighting as each group has different requirements. Do not think rural and urban firefighting should be operated as one service as the training, equipment and operational requirements are different.

Eight other submitters believe that they should be separate to recognise the land management role of rural fire, which is distinct from urban. Seven others emphasised the need for any new organisation to recognise the specialist vegetation requirements for rural fire, with the Wellington Rural Fire Force saying that:

Efforts need to be made to ensure we retain specialist rural fire fighting volunteers throughout any change, and structures need to accommodate the skillsets required now and into the future.

### Recognising the difference in rural and urban delivery

#### Using Option 1 to recognise the difference between urban and rural

Sixteen submitters supported Option 1 and the continued voluntary amalgamation of Rural Fire Authorities to maintain the current rural expertise. For example, an individual said that:

Option 1 is the only option in the DIA discussion document that comes near to meeting these risk management principles for the management of fire on the forest and rural landscape of NZ.

In particular, 12 submitters supported the continued voluntary amalgamation of Rural Fire Authorities because they did not see the benefits of forced amalgamation, citing concerns such as a lower level of integrated service delivery for higher costs.

#### Making ERFDs compulsory to recognise the difference between urban and rural

Seventeen submitters supported the current ERFD model with many recommending that ERFDs are made compulsory as a first step. They considered that this would maintain the separation between urban and rural fire delivery but improve the coordination and build on the good work that is already underway. Six of those submitters were rural and volunteer fire forces, two were ERFDs, two were local authorities and two were involved in forestry.

In particular 13 submitters mentioned that the Otago Rural Fire Authority was an example of the current ERFD model working well, with most of those submitters coming from Otago. In its submission, the Waitaki District Council said that:

ORFA has met the needs of the community and members. Under this model the decision makers and funder have direct and frequent contact with volunteers and paid staff.

#### Using Option 2 to recognise the difference between urban and rural

Twenty submitters supported Option 2 as the best way to maintain a separate rural and urban fire service delivery. One of those submitters was Federated Farmers, two were associated with the forestry industry and four were local authorities. Six submitters also liked the greater scope that having independent board members would provide, improving levels of transparency and accountability with improved resourcing and support. Three other submitters also mentioned that Option 2 still remains confusing with an overly complicated structure, which still maintained dual authorities between urban and rural.

Eight submitters did not agree that the new Rural Fire Authority boards under Option 2 should be appointed by the Commission. Their comments included that the board would be removed from the community and controlled by Wellington. The preference was for boards to be appointed locally and to include local stakeholder groups that contribute funding and resources.

#### Using Option 3 to support both urban and rural

On the other hand, 14 submitters supported unifying rural and urban fire under one service, so that both sides were treated more equally and to ensure greater coordination of fire services. Two of those submitters emphasised the need to maintain a vegetation stream under this Option. Three submitters also supported Option 3 with a structure that had a Deputy Chief Executive for rural and urban so that the two continued to be separate.

### Stakeholders’ involvement in rural fire

Submitters emphasised the importance of keeping current rural stakeholders such as local government, forest owners and farmers involved in rural fire (28 submitters). Seven of those submitters recommended that stakeholders are involved in the governance of rural fire, with the Forest Owners Association saying:

An essential component of any option selected is that the collaborative stakeholder driven approach to rural fire management be maintained. This will provide for a more engaged rural society with regards to rural fire which will lead to less duplication of resources and efficient delivery of services.

Three submitters emphasised the need for rural stakeholder staff to remain involved with rural fire, with the Christchurch City Council saying:

The skill-set and capabilities of land management agencies such as DOC, forestry contractors and Parks Teams within local government are critical to effective management of large-scale vegetation fire incidents.

Two submitters also stated that forestry companies should remain involved in a private and public partnership with rural fire; one was the Rural Fire Network, the other Action Forest Management.

Sixteen submitters were concerned that current rural fire stakeholders would no longer be involved in the delivery of rural fire services under Option 3. Nine of those submitters specifically referred to the loss of input and control from forest companies. Most of those submitters were rural fire forces, as well as three local authorities and two ERFDs.

#### Local government involvement in rural fire

Nine submitters supported local government no longer having responsibility for rural fire, particularly because it was not a core activity. All of those submitters were local authorities and seven of those local authorities supported Option 3. On the other hand, nine submitters supported local government remaining involved in rural fire, to ensure that their skills and knowledge still contribute to rural fire. Four other submitters also supported their involvement in rural fire mentioning that as an advantage of Option 1. Most submitters that supported local government involvement were local authorities, with the Rural Fire Network also supporting that view, and LGNZ who said:

That local government has (and needs to continue to have) a close working relationship with the fire services for such purposes as civil defence, rural fire land management and structural fire safety.

#### Long duration fires

Nine submitters made suggestions about how to deal with long duration fires under a new model. Three submitters thought that more consideration was needed of how this would be resourced, with two submitters stating that this would be too much to ask of volunteers. Other suggestions included establishing Inter-Agency Protocols and ensuring local government remained involved with its access to staff. In its submission, Gisborne Volunteer Rural Fire Force said:

Ensuring there is enough capability and expertise for long duration/campaign vegetation fires must be built into new structure.

### Powers and legislation

#### Cost recovery

Twenty submitters discussed how cost recovery should operate, with 13 supporting retaining the provision to recover costs from the person responsible for the fire. This is regarded as an effective compliance tool for education and personal responsibility and an effective deterrent for careless behaviour. There was a concern that replacing this with an infringement scheme would restrict its impact. Six submitters recommended reviewing the current cost recovery provisions, because they are confusing complicated, inefficient and inequitable. One submitter also requested that cost recovery is not extended to non-fire activities, such as motor vehicle extrications.

#### Setting boundaries

Twelve submitters agreed that there should be no distinction between urban and rural boundaries, with five of those submitters citing the removal of boundaries as a benefit of proceeding with Option 3. On the other hand, five submitters stated that merging boundaries of both urban and rural or merging different Rural Fire Authorities may not be appropriate. Most of those submitters specifically referred to a concern with merging Otago and Southland, because the risks and needs in each area are quite unique.

Consulting on how the boundaries are set was an issue raised by nine submitters. One of those submitters was Federated Farmers. The Wanganui Rural Community Board in particular requested input because it has concerns regarding risk and distances to travel for the rural fire fighting force. Two submitters said that the boundaries of the new organisation should align with existing boundaries, such as those of regional or district councils and Civil Defence and Emergency Management groups.

#### Fire regulation activities

Twenty-two submitters discussed how the issuing of permits and the setting of restricted fire seasons would occur under a new governance model. Three of those submitters found it hard to understand how this would operate under Options 2 and 3 and were concerned about a loss of local control.

Four submitters either wanted to continue with the status quo with Rural Fire Authorities issuing permits and setting bans. In its submission, the Southern Rural Fire Authority also asked for a simplified provision in legislation for Rural Fire Authorities to impose 'fire ban days’ themselves. Five submitters recommended that local government or an equivalent land management organisation remain in charge of all fire regulation activities.

Other suggestions from submitters included:

* fire season status and permit issuing to be influenced by local needs;
* bans not necessarily being by district, with weather not respecting boundaries;
* creating a permanent position for this role;
* greater powers given to District Fire Officers to ensure the enforcement of the regulations and regular use of emergency exits and equipment should be mandated beyond the six monthly inspections;
* current section 28 incident controller powers to be maintained;
* that it is far more appropriate for the relevant fire service, rather than the local electricity distributor, to have strengthened powers to assess the risks involved and to ensure that any dangerous situations are remedied; and
* new water storage requirements for habitable buildings and rural properties.

LGNZ in its submission said that the fire safety regulations need to be fit for purpose and appropriate for the different regions that make up New Zealand.

#### Offences

Four submitters commented on fire offences, with three stating that there should be strict liability on all offences and two supporting changes to legislation that would allow for instant fines for lighting unapproved fires and other offences. Another submitter said that the legislation needed to be clarified, with a current reliance on prosecution for minor but significant breaches of the Forest and Rural Fires Act, which means that people are not held to account.

#### The new structure and legislation

How the new structure should be expressed in legislation was raised by 17 submitters. Seven of those submitters supported the development of a single comprehensive statute and six said that it should be empowering rather than prescriptive. Three submitters emphasised that the new organisational structure should not be dictated by legislation.

Other comments from individual submitters about legislation and the structure of the fire services included:

* keeping the Forest and Rural Fires Regulations as it provides a good framework for Fire Plans;
* keeping separate legislation for rural fire;
* updating the legislation so that it covers insurance for contractors;
* confirming in legislation that an ERFD is not a Council Controlled Organisation; and
* including in legislation a mandate for NZFS (or the resulting organisation) to train young people in basic level emergency response and risk awareness which is consistent with educational outcomes.

#### Hazardous substances

Four individuals commented on hazardous substances and the review, with one stating that NZFS provides a good service, and they would like to see them provide more advice to WorkSafe. Another raised issues such as training and coordination amongst emergency services, local authorities and the chemical industry on hazardous substances. Two other submitters commented on the funding options and hazardous substances with one asking how they would be paid for (direct charge or Crown appropriation) and another recommended that properties be charged based on their risks, such as the presence of hazardous substances.

### Paid workforce support

Some submitters commented on the support that the options would provide to the paid workforce, and some risks with the changes. One submitter supported Option 2 providing support and mentoring for Principals Rural Fire Officers and other paid rural staff. Three other submitters considered that Option 2 would provide greater opportunities for career paths, creating a larger pool of professional emergency managers. Nine submitters considered that Option 3 would provide career opportunities for rural and urban staff. Another two submitters considered it would be an advantage for firefighters to have one reporting line for performance under Option 3.

On the other hand, one submitter considered that changing the management under Option 1 could lead to the loss of key people, including knowledge holders. Four submitters were concerned that Option 3 would result in the loss of local authority staff and possibly other rural firefighters. Another submitter was concerned that Option 3, and possibly Option 2, could result in a loss of rural fire expertise and experience. The submitter considered this had happened in areas with amalgamated Rural Fire Authorities.

### Industrial brigades

Thirteen submitters also commented on the use of industrial brigades, which included two local authorities, two ERFDs, an industrial brigade and a forest owner. Two of those submitters, the industrial brigade and an individual, said that operators of registered industrial fire brigades save the NZFS money and resources and that this should be acknowledged, and allowed for in the new legislation.

One submitter said that industrial brigades support the wider community by attending incidents outside their immediate site. Three submitters, including an ERFD and a forest owner said that splitting funding between local funding for the regions and national funding for national initiatives, would allow for forest and large industrial companies (including airports) to contract part of the service delivery without isolating them from the standards being applied nationally.

Three submitters also raised the possibility of the Department of Conservation running its own industrial brigades under the options, with one of the local authorities supporting the continuation of industrial brigades under each of the options. Another submitter stated that an advantage of Option 2 was that it would allow for supporting industrial brigades to manage reduction and response for specialist or high value/risk assets.

The industrial brigade, Carter Holt Harvey Pulp and Paper Limited, also stated that there should be incentives for property owners who actively manage their fire risk and /or run registered industrial fire brigades.

### Using research

Eleven submitters recommended utilising and incorporating research in the new governance model. Six of those submitters recommended ongoing support for rural fire research and highlighting the importance of research, with Christchurch City Council stating:

Research is critical for supporting safe and effective fire management through enhanced understanding of fire behaviour, while social research and development of new engineering solutions are integral to reduction.

Other submitters recommended using research to ensure that current training is of the highest possible standard, to research attracting and retaining volunteers, and undertaking more research to help identify which model would deliver the best outcome.

### Efficiency

Three submitters thought that Option 1 (or a modified Option 1) would be more efficient at responding to local needs. One submitter considered that Option 2 would achieve this and another considered that a national organisation under Option 3 would struggle to achieve this.

Four submitters considered that ERFDs were inherently more inefficient than un-amalgamated Rural Fire Authorities. One submitter considered that both Options 2 and 3 would bring higher fixed costs and bureaucracy, and an additional five submitters were concerned about the possible costs of bureaucracy in Option 3.

One individual drew a link between the stakeholders involved and the efficiency of an option:

From experience in other countries when key forest and rural stakeholders, and their contractors, are removed from any direct funding/contribution/accountability for the management of forest and rural fires they will become less involved and as a result less interested in retaining the necessary skills required to remain engaged.

Nineteen submitters discussed how larger organisations can provide economies of scale and flexibility, with six submitters considering that Option 3 would provide this. Two submitters considered that shared services would be an advantage of Option 2 and one that it would be an advantage of Option 3. One submitter considered that existing NZFS systems could be used under Option 3 to benefit volunteer brigades and rural fire forces.

A number of submitters considered potential areas of economy under Option 3:

* building a flexible, fit for purpose organisation (three submitters);
* avoiding need for changing the rural fire district boundaries (two submitters);
* matching resources to community risk (one submitter)
* combining and rationalising resources (one submitter);
* undertaking joint public good activities, such as education (one submitter);
* co-locating stations, which could also assist with earthquake strengthening prioritisation (one submitter);
* more streamlined services to the community (one submitter); and
* having NZFS firefighters assist at vegetation fires.

Seven submitters made comments about duplication and its effect on efficiency. Three submitters considered that Option 1 would duplicate administrative resources, because of the many different Rural Fire Authorities. Four submitters considered that Option 2 would duplicate resources and services and five submitters considered that Option 3 would avoid this duplication.

## 2.3 Theme three: Community involvement

This section focuses on the community involvement in the fire services. This has been discussed by submitters both from the perspective of fire services making decisions for their local community (local control), and how the wider community is involved in the fire services (see the table below). This section first focuses on comments on the impact of the governance options on community involvement and then considers how to maintain this involvement.

Figure : Number of comments on community involvement themes



### Community involvement and the options

#### Keep local control/ownership

Thirty-five submitters, including rural fire stakeholders and local authorities, discussed whether there should be local control of the fire services. Most submitters considered this issue in relation to rural fire services. They considered that local control provided a better service to the community, allowed the fire services to meet local needs and avoided distractions by issues from other regions. Nine submitters considered that local control was a benefit of Option 1, for these reasons.

Eleven submitters considered that Option 2 would provide for local control through the new Rural Fire Authorities. In contrast, five submitters considered that it would be harder to provide local solutions under Option 2. The Maungakaramea Voluntary Rural Fire Force was concerned:

We have observed with the neighbouring Northern Rural Fire Authority (an Enlarged RFA) a loss of local input, with appointed non-elected committee members serving the interests of their appointing organisation rather than the wider community who are locked out of any input.

Twenty-four submitters, mostly rural fire stakeholders, were concerned about the loss of local control under Option 3, while one submitter considered it was unclear who would make local or regional decisions. Submitters considered a national organisation would make it more difficult to individualise and create local solutions. One submitter was concerned that Option 3 could risk the closure of rural fire stations.

Seven other submitters also emphasised the need for an Option 3 model to not be a top down, one size fits all approach.

Two submitters considered it important to have a direct line of accountability from the fire services to the community. One submitter considered that local responsibility would be kept under Option 1, while another considered it would be kept under Option 2. One submitter considered that international experience supported sharing responsibilities between the government, communities and citizens, which the submitter considered was best met by Option 1.

Two submitters were concerned about the effect of the options on the local identity of the fire brigade or force in their community. One submitter considered that Option 2 would protect this local identity, while another submitter was concerned that Option 3 would mean that brigades would lose this local identity.

#### Community involvement

Nineteen submitters, mostly rural fire stakeholders and local authorities, discussed how the options would affect communities’ ability to provide input on the fire services. One submitter considered Option 1 would allow communities a greater say.

While five submitters considered that Option 2 provided a mechanism for stakeholder input into the fire services, one submitter was unclear how this would occur. Another submitter noted the community needed the opportunity to provide input under Option 2.

Two submitters considered that Option 3 would provide for formal opportunities to consult with communities on their needs and risks. Another submitter considered that community liaison groups could enhance local communication. However, six rural fire stakeholders were concerned that there would be a loss of local input. One submitter considered there would be limited input from stakeholders, unless Option 3 was modified.

Federated Farmers considered there was a need for appropriate communities of interest. It noted:

…even if a regional structure could preserve local decision making, it would not allow the appropriate grouping of communities of interest.

#### Connecting with communities

Twelve submitters, mostly local authorities, discussed how the options either enhanced or risked the connections of the fire services with their communities. One submitter considered that Option 2 would allow connections between volunteers and communities. Another submitter considered that ERFDs may be separate from communities, which would be a risk of Option 2.

Eight submitters, including local authorities and brigades, considered that having a national service could create a distance between the fire services and the community and lead to the loss of trust. A rural fire force considered that a national service could create a reliance on the service, leading to a loss in community resilience and self-reliance. One submitter considered that having one organisation for rural fire under Option 3 would be useful for stakeholders.

#### Funding and communities

Seven submitters, mostly rural stakeholders, discussed the relationship between funding and communities. Two submitters considered that if there was local funding, there should also be local control and oversight of that funding. Another submitter wanted communities to be able to continue to fundraise under any option.

One submitter considered an advantage of Option 1 was that there was no competition for local funding. Two submitters were concerned that Option 3 would risk current local funding streams, including community fundraising. Another submitter was concerned that funds may not be spent in the community that is paying under Option 3.

### How to maintain community involvement

#### Establish regional governance

Sixteen submitters, including local authorities and ERFDs, recommended using a decentralised, regional model to deliver services in local areas, to strengthen connections with communities. One of those submitters referred to the roading model with national standard setting and local control of resource allocation. Another submitter supported integrating Rural Fire Authorities with civil defence and emergency management.

Five of those submitters provided some specific detail about how these could operate. Three submitters provided the same model, which involved:

* governance at a regional level;
* coordination at a national level, managed by separate administration and operations arms; and
* a parent board in much the same way as a corporate board sits above subsidiaries.

In this model, the region would set priorities and provide service for both urban and rural fire management under policies, standards and parameters set by the parent board.

In its submission, LGNZ suggested that:

To ensure local services are responsive and appropriate to local circumstances some form of devolved decision-making structure is required, such as regional board made up of the major stakeholders in each region; The roles of these boards should be significant enough to incentivise regional coordination between urban and rural fires services...

The Forest Owners Association also recommended an option that included:

* a national board of governance;
* national management with a rural/urban split; and
* regional rural fire districts, about 15 in total, with rural and urban boundaries not necessarily the same. The governance would be like the current ERFD model, with urban committees created as necessary. The regional fire districts would deliver the 4Rs and organise funding for community needs.

Ten submitters referred to having distinctive regional rural fire authorities, reinforcing regional ownership and control, representative governance and strong and deliberate community consultation and engagement. Those submitters included two ERFDs and two local authorities. Two other submitters recommended copying the rural model over to urban to ensure that there was community engagement.

#### Keep community focus

Thirty submitters, mostly rural fire stakeholders and rural fire forces, commented on the need to keep the community focus in whatever structure is progressed with. They emphasised the need to keep communities engaged in how fire will be managed and that this is a critical outcome of the review. One submitter stated that if they have a disgruntled community they have fewer people willing to volunteer. Some suggestions of how communities could be involved included:

* communities determining size and location of fire services, and directly electing most of the committee;
* an elected body, similar to the District Health Boards with some Commission appointed members;
* establishing a community board with input into the national service;
* community input through a structure similar to the current ERFD model; and
* establishing “advisory” committees.

In its submission, the Waimea Rural Fire Authority said:

Any organisational structure that distances the ability of communities to be heard and to participate in the development of 'fit for purpose' rural fire and emergency management is at risk of undermining their goodwill and willingness.

The Professional Firefighters Union opposed the creation of a formal body in its submission, saying that:

The Union sees no practical reason for formalised community involvement and would resist any suggestion that some sort of local Community Board could have the ability to determine local resources or operational matters.

#### Local responsiveness

Seven submitters emphasised the need to maintain local responsiveness in the new model to ensure that expertise remained in the area and to enable timely responses. As Ōpōtiki District Council said in its submission:

Local responsiveness is critical not only to respond in a timely manner but also to ensure services are matched to the nature of local threats and to support action on local priorities.

## 2.4 Theme four: Transition

This section considers submitters’ appetite for change from preferring a smaller scale change such as that proposed in Option 1, to encouraging the review to make significant changes to get a shift in how the fire services operate. It also talks about culture change, how this operates at the moment and how this could change under the options. Submitters’ comments on how to help smooth the transition are also provided here, as well as the suggested names for the new organisations. The table below shows the number of comments on the transition themes.

Figure : Number of comments on transition themes



### Appetite for change

This section details submitters’ comments on the issues or consequences they saw following change of the magnitude of Option 1, 2 or 3.

#### Impact on rural volunteers and rural communities

Waitaki District Council said that Option 1 was the least likely to cause rural volunteers to leave. Two submitters feared Option 2 could or would lead to loss of staff and would need to be carefully managed. Many submitters voiced concerns about resistance to the size of the change in Option 3 that would lead to the fire services losing volunteers and paid firefighters, particularly in rural areas, and in local authorities. One submitter believed this loss of skills would only be short term.

Waiwhare Volunteer Rural Fire Force was concerned at:

… a significant loss of local knowledge, access to local resources and a vast reservoir of experienced based, practical, common sense that leads us to deal with emergencies in a rather unique and intelligent “country way”.

Option 3’s impact on rural communities and rural fire services was noted by eight submitters. One said rural fire would become a “poor cousin” of NZFS. Great Barrier Island Voluntary Rural Fire Force noted the risk of a long term erosion of rural sector capability and expertise. Gisborne Volunteer Rural Fire Force said Option 3 would:

…disadvantage the existing vegetation firefighting community/structure in that it would exclude forest companies firefighting capabilities that currently provide a strong backbone to many existing rural fire districts.

Action Forest Management Limited said that forest companies “would retreat to their boundaries and withdraw significant resources and skills from the pool available in the fire district”. However Thames-Coromandel District Council felt the culture of cooperation in small communities would continue.

#### Effectiveness

Forty-five submissions believed Option 1 would be ineffective, because it would expand current arrangements, would have no effect on communities or volunteers, and would fail to address the issues.

An individual said that:

Talk is cheap and as this is the cheapest option it is most likely to be the most talked about with least effect option.

Eighteen submitters noted that Option 2 would also not go far enough, with the Rarangi Rural Fire Force saying that:

This is not a long term solution to current issues. We need much further reaching change than this option allows for.

Eighteen submitters also said that Option 3 was the best option to future proof the fire services or address all of the problems identified by the review.

#### Amount of disruption

Option 1 was noted by three submitters as being a comfortable change for volunteers and staff, and six submitters said that it would mean minimum disruption. As Carter Holt Harvey Pulp and Paper Ltd said in its submission, Option 1 is “what people know”. The Farming Members of the Upper Clutha Vegetation Control Group also noted that Otago had been through enough change in recent times, which meant that Option 1 was more appealing because it involved less change. Option 2 was considered comfortable and familiar by two submitters and less disruptive than Option 3 by three submitters.

Eight submitters said Option 3’s change was too big, with submitters calling it a “radical change”, a “massive cost and upheaval”, and a “massive and disruptive organisational change”. Blackmount Rural Fire Force said that while Option 3 would appear to be the only way change would occur, if it could not be fully implemented, fire services would end up in a “worse place than we are now.” One individual submitter wrote that Option 3 would have no negative results if it was managed correctly and fully.

#### Cost and risk

Option 1 was noted as the cheapest by nine submitters and as the least risky option by two submitters. Motunau Rural Fire Force noted:

My concern is that this will take time, legislative change and most of all – more funding. Funding that could be better spent on frontline equipment.

The cost of Option 2 was listed by five submitters, with some seeing it as an advantage and others a disadvantage. Two submitters thought Option 2 was less risky than Option 3. The cost of Option 3 was mentioned by 13 submitters, and often linked to other issues such as length of time to implement, upheaval, effectiveness and/or value for money, or the need for a major investment to ensure consistent service levels. The risk of a change of Option 3’s size was noted by six submitters, with Aviation New Zealand calling it very high risk.

Wellington City Council was concerned about this risk saying that:

New Zealand does not have a good track record of successful national organisations effectively delivering services that are both diverse and with different levels of services and multiple sources of funding.

Waimate District Council wants the costs to be shared equitably so those rural fire areas with the greatest need to improve standards would meet a proportionately larger share of the cost. An individual noted that other countries with one national fire service find it expensive. Others noted that Option 3 afforded economies of scale, avoided duplication of costs and resources, and was the logical step in terms of funding and consistent service delivery.

#### Speed and ease of implementation

Option 1 was simple, easy and quick to implement (six submitters). Three submitters said that Option 2 could take too long, and the Maungakaramea Voluntary Rural Fire Force stated that Option 2 was “cumbersome and messy” or “more complex”. The length of time needed to implement Option 3 was remarked on by eight submitters, with the Maramarua Rural Fire Force saying it was “a structure we need now, not tomorrow”. Waitaki District Council was concerned at the impact on services of a long implementation time. Two submitters believed the simplicity of Option 3 would counteract that, with the West Coast Rural Fire Authority saying that:

Relatively straightforward to roll out NZFS Operational systems and national standards across the “willing” rural fire districts.

Four submissions noted that Option 3 would be the hardest of the three options to implement – “difficult and complex” said one, and the ERFD Chairs’ Group said:

The transition needs to be fast enough to maintain momentum but slow enough to ensure engagement is not lost.

#### Legislative requirements

The legislative change for Option 1 would be simple (two submitters), but “significant” for Option 2 (two submitters) and for Option 3 (four submitters). One was concerned that objections to Option 3 might derail the legislative change needed.

#### Seen as a transition step

Three submitters believed Option 1 could be a transitional phase and could be flexible enough to change. Waikanae Volunteer Fire Brigade called it a stop-gap measure and the Paekakariki Volunteer Fire Brigade said:

It makes sense to identify specific phases and define the success criteria before moving to an all-inclusive option three.

Option 2’s transitory nature was appealing to four submitters who said it would allow incremental change to a national service. Wellington City Council noted it would allow a smooth and deliberate transition to a national entity. South Canterbury Rural Fire Authority and the Chair of an ERFD said Option 2 was a “natural evolution” of the formation of ERFDs for rural fire management. Two submitters (a local authority and a Volunteer Fire Brigade) were not opposed to Option 3 but felt the change should be staged, with Option 2, then Option 3.

### Current cultural issues

This section focuses on submitters’ comments about the current cultural issues within the fire services, how this could change under the governance and support options and some recommendations for implementing a positive culture change.

#### Positive culture

Six submitters commented on the positive aspects of the current culture. These included the satisfaction of carrying out a community service, the camaraderie of the crew, the unique character of each brigade and the culture of cooperation in small communities. One individual also said that:

Improvement in safety and command and control skill levels that have been made in response to recent operational reviews are leading to a major positive culture shift in the organisation.

#### Difference between rural and urban

Twenty submitters commented on the difference between rural and urban volunteer fire forces which are smaller, community focused and often attend to longer call outs and have different training requirements. They believe it would be hard to bring the two cultures together, with a strong "us and them" mentality.

One submitter, the Waitaki District Council, said:

The nature, complexities and approaches to urban and rural fire are very different. These differences mean that very different approaches and cultures have developed. These cultures may be appropriate for the situations they developed in but are unlikely to transfer effectively to a completely different set of situations.

Three of those submitters were concerned that rural fire would be dominated by urban if a merger was to happen. Three of those submitters recommended keeping the two separate, because the cultures are so different, which included Federated Farmers and the Forest Owners Association. In its submission, the UFBA said that the different cultures should be respected within a unified structure. Three other submitters were concerned that the current NZFS culture is domineering and would make it difficult to merge it with the rural sector and with career and volunteer brigades.

#### Difference between volunteer and paid staff

Eight submitters specifically mentioned the cultural differences between volunteer and paid firefighters with a perceived conflict of cultures. The Gore Volunteer Fire Brigade said:

Some career area management attempt to use methods brought directly from the career sector to direct volunteer brigades without investigating more appropriate community, time focused, volunteer friendly methods.

### How the options could impact on culture change

The main impact of the options on culture change is the prospect of merging the different cultures under one national fire service, which was raised as an issue by eight submitters. They recognised that it would be a challenge to bring them together, and would require an extreme change in culture that could lose engagement because it would take so long. There were also concerns that the direct volunteer relationship with the organisation would erode the positive culture in the volunteer brigades. As the Great Barrier Island Voluntary Rural Fire Force said in its submission:

Would require significant changes to culture to allow for true integration and equal status.

In its submission, LGNZ also said that:

Better integration is generally supported but there are reservations about the ability of reform to create an organisational culture that fairly reflects the interests of both professional and volunteer services. If an integrated approach is to succeed then efforts will be required to build a new culture that acknowledges the importance of both.

Five submitters said that option 3 was the only way to get the shift in culture and get away from parochial attitudes, although it would require a major overhaul. The Waitakere Volunteer Fire Brigade said that:

It allows the building of a fit for purpose service organisation, devoid of historical culture clash nor rural versus urban.

Three submitters also thought that a national system under Option 3 would struggle to adequately meet diverse expectations and provide for diverse cultures. One commented that Option 3 could only be feasible if starting with a clean slate, and if more information is provided on how it would keep the community connections. Four submitters were also concerned that option 3 would reduce community involvement and disempower the volunteer brigades, as they lose their cultural identity within the one organisation.

Two submitters also commented that no culture change would be achieved under Option 1.

### How to help the culture change

This section describes submitters’ advice on how to achieve the culture change required, from undertaking more consultation to considering how volunteers would be impacted by the changes.

#### Consultation

Thirteen submitters mentioned that consultation needs to continue with key stakeholders, and that affected parties should be given the opportunity to comment on proposals. One submitter commented that the timelines could make this consultation difficult, and another that consultation was even more essential because of flaws in the discussion document.

#### Acknowledge and manage culture

Seven submitters said cultural differences for example between rural and urban brigades need to be acknowledged and managed appropriately. One submitter stated that processes should be put in place to support increased collaboration, especially in dealing with community engagement around the 4Rs; another suggested that addressing culture change was the key element to addressing the current "them and us" culture.

Nine submitters recommended recognising the current achievements in the fire services and building on this. One of those submitters was the Pumicelands Rural Fire Authority, which has just become an ERFD after six years of negotiations. The Eastern Regional Rural Fire Committee said in its submission:

There is a need to keep the review moving. This is the 3rd review and the processes are unsettling for all concerned, especially volunteers. The review team should consider what is working well to influence the delivery and structure of fire and emergency services moving into the future.

#### Keep rural expertise and a local focus

Twelve submitters also asked that the current expertise in rural fire be kept through any structural changes. These submitters included Scion, the Forest Owners Association, Federated Farmers and Action Forest Management.

Five submitters wanted to ensure that any institutional and structural changes should be designed to accommodate local arrangements. For example, consideration of local conditions such as large rural areas with dispersed rural communities. In its submission, LGNZ said:

A number of councils have indicated that their local and regional arrangements are working very well and that they are concerned that change might undermine the effectiveness of those arrangements, particularly in their ability to deliver integrated fire and emergency services.

### Suggestions on how to transition

Thirty submitters made suggestions about how the fires services could transition to a new model. Six submitters recommended starting to migrate systems, moving rural fire parties region by region and co-locating urban and rural fire stations now, and two submitters emphasised considering the transfer of assets and the investment required for rural fire. Seven submitters commented that the transition phase would require adequate funding to ensure its success, three other submitters stated that a solid and smooth transition plan was essential to implementation.

Four submitters mentioned that any change should have minimal disruption on current service provision, with the Farming Members of the Upper Clutha Vegetation Control Group saying in its submission:

We think it is important that the implementation minimises the uncertainty and disruption for the rural firefighters. Especially those in areas that have recently been through change and those areas that are currently working effectively.

Another submitter suggested setting realistic goals to help with the transition, and another to invest in independent research. Three submitters commented that volunteers and rural fire forces would be more comfortable with becoming one national service, if there was some type of distinguishing insignias to clearly show their specialist fields.

### Names of organisations

Sixteen submitters recommended keeping the name "New Zealand Fire Service", stating that it is a recognisable and well respected name. Six others recommended the name "National Fire Service". One submitter said that the current Fire Service Commission and National Rural Fire Authority should remain.

Fourteen other submitters suggested that "emergency" should appear in the name, with suggestions such as "New Zealand Fire and Emergency Service", although one submitter said that this should only occur if other emergency services such as ambulance were included.

Thirty submitters suggested including “rescue” in the name, such as "New Zealand Fire and Rescue Service" or "National Fire and Rescue Service". Eight other submitters recommended a name that included both “rescue” and “emergency” in the name, such as "Fire and Rescue Emergency Services".

Four submitters recommended keeping a rural aspect for rural authorities if they remained, recommending "New Zealand Rural Fire Services".

Seventeen submitters provided other name suggestions, which included:

* The Royal New Zealand Fire Service;
* Public Safety New Zealand;
* New Zealand Fire Intervention Rescue Emergency Service (FIRES);
* Include integrated in the name (two submitters);
* Include the region's name to imply the local ownership while maintaining a link with the parent board; and
* NZ Fire Service is retained for urban (professionals) and Community Emergency Services for Regional Council based emergency resources.

Two submitters said that the title might not need the word 'fire' in it, while two others said that the name does not matter so long as it works and four others that it was too early to establish a name when the outcome was uncertain.

## 2.5 Theme five: Funding purpose and principles

This section looks at comments about the options in relation to funding (see the table below). The themes covered are around how funding should be allocated between urban and rural fire, who should fund, and the funding implications of the governance options. This section does not consider the issues and options for funding the Commission; they are addressed in the separate Funding of the Commission section.

Figure : Number of comments on funding purpose and principles themes



### Comments on the funding system generally

#### Addressing the funding issues

A number of submitters commented on how the governance and support options addressed the funding issues. Eleven submitters, including local authorities and rural fire forces, considered that Option 1 did not address the funding issues. Another submitter considered that Option 1 did address the funding issues. One submitter found the current system confusing and inequitable.

Five submitters were concerned about the funding requirements under Option 3 and whether the current funding system could meet those requirements. One submitter considered that Option 3 did not address the funding issues adequately.

#### Transparency of processes

Two submitters considered that Option 1 will provide clarity about the process of grants from the Commission to Rural Fire Authorities. Another submitter considered that Option 2 would provide transparency of funding.

One submitter was concerned that under Option 3 some organisations may be paying into the service but without having control over the spending. Another submitter was concerned that local rates would be paid into a national organisation under Option 3.

Five submitters, including rural fire forces and local authorities, were concerned that areas with large populations would receive greater funding than smaller communities under Option 3. One submitter was concerned that under Option 3 more funding would go to career firefighters instead of volunteer firefighters.

### Funding of specific functions

#### Adequate funding of rural fire

One submitter supported increased funding being provided to rural fire under Option 1. However, two other submitters were concerned that under Option 1, the Commission would reduce funding to unamalgamated Rural Fire Authorities. Three submitters considered that funding would be inadequate under Option 1. Two submitters considered that budget constraints would affect performance and capability under Option 1. Another submitter was concerned that under Option 1 the fire service levy would be paid by rural property owners and would not be returned to them through the Rural Fire Authorities.

Twelve submitters, mostly local authorities and rural fire forces, supported improved funding to rural fire under Option 2, while another submitter was unclear what funding would be given to rural fire. Two submitters were concerned that Option 2 could lead to competition for funding between brigades or regions. Two submitters considered that Option 2 needed to address better funding of rural fire.

Ten submitters, mostly firefighters and local authorities, considered that Option 3 would provide clarity around funding, and consistency across the country. Four submitters considered that Option 3 would improve funding for rural fire. Another submitter considered that Option 3 could improve services by targeting funding in poor rural areas.

#### Other functions

Six submitters, mostly rural fire forces and firefighters, were concerned that Option 1 did not address the cost of non-fire functions. Six submitters, mostly rural fire forces, supported the funding of non-fire functions under Option 2. Two other submitters considered that the Commission funding rural fire to undertake non-fire functions would be “messy”. One submitter wanted national funding to support non-fire functions.

One submitter considered that either Option 1 or Option 3 would allow for better matching of resources to risk. Another submitter considered that Option 3 would allow funding to be allocated according to community needs. One submitter wanted national funding to support volunteers, while another submitter was unsure where the additional funding to support volunteers under Option 2 would come from.

### Local funding of rural fire

#### Support for and against local funding

Some submissions focused on the current system of local funding of rural fire and how that might change under the options. In relation to Options 1 and 2, submitters:

* supported local authorities funding rural fire under Option 1 (two submitters);
* did not support local authorities funding rural fire under Option 1 (one submitter);
* considered that Option 1 is unclear about funding by local authorities (one submitter);
* supported local authorities funding rural fire under Option 2 (two submitters);
* did not support local authorities funding rural fire under Option 2 (two submitters); and
* considered that funding would be inadequate under Option 2 if local authorities continue to be responsible (two submitters).

Twelve submitters, mostly local authorities, supported local authorities ceasing to fund rural fire under Option 3 because, for example, it would allow local authorities to spend money to benefit their communities in other ways and would require funding from all those who benefit from the rural fire services. Another submitter supported the reduction or removal of levies from forest owners under Option 3. Two submitters did not support local authorities no longer funding rural fire under Option 3. Another submitter considered it was unclear whether local authorities would continue to fund rural fire or not under Option 3.

#### Those who contribute funding to be involved in decision making

Eleven submitters, including nine local authorities, emphasised that, if a stakeholder such as a local authority was contributing funding to the fires services, it should be involved in decision making or have some ability to direct the use of the funding.

The Taranaki Rural Fire Authority was concerned that, if this local funding was no longer provided:

…there is a strong risk that local authorities will no longer see any reason to contribute to rural volunteer fire services in their districts. There is also a possibility that the cost of any support provided to the rural and volunteer services, such as the use of facilities or services, may end up being invoiced to the national fire service.

#### Risks of removing local funding

Some submitters were concerned about the consequences of removing local funding of rural fire under Option 3. Five submitters were concerned about the removal of in-kind contributions, including the contribution of fire forces, from local authorities or forest owners to rural fire.

The Voluntary Rural Fire Force of the Waimea Rural Fire District considered that:

The WRFD is heavily reliant on the input of forest companies in terms of plant resources, incident management expertise, heavy machinery, aircraft management, fit young strong legs and the cash they put into the pool that makes up the WRFD. Under option 3 this could disappear back to the forest boundary. If this occurred it would result in a far less effective and efficient rural fire response in our fire district.

One submitter was concerned that Option 3 will mean disinterest from local representatives in fire related issues if territorial authorities, forest companies and the Department of Conservation do not contribute to rural fire.

### Funding implications of the options

Some submitters, mostly individuals, commented on the funding implications of the options. Two submitters considered that an advantage of Option 1 was its cheaper cost than other options. Two submitters considered the increased cost of Option 2 to be a disadvantage, while another submitter was concerned the actual cost could be more than the projected cost. Four submitters were concerned about the increased cost of Option 3.

One submitter was concerned that Option 1 would result in forced amalgamation of rural fire, including areas that had insufficient funding for training and equipment. Another submitter was concerned about the requirements for upskilling in Options 2 and 3.

One submitter considered that the cost of changing the fire services could be better spent on more frontline equipment.

### Funding and its connection to the governance and support options

Some submitters, including individuals and rural fire stakeholders, specifically linked the funding options with the governance and support options. One submitter considered the funding options and governance structure needed to be considered in parallel. Another submitter noted the relationship between those who bear the risk of rural fires and delivery of services needs to be considered in developing funding models.

Three submitters considered that the funding model should be developed after the governance model is decided. Another submitter considered that the funding option needed to follow the principles on which the governance option was established.

Another two submitters wanted to see more information about the costs and benefits of the governance options to assist with identifying who should carry the costs of those options. Another submitter found it difficult to analyse the governance options before the funding options were finalised.

One submitter considered that Option 3 and Funding Option 2 worked well together. Another submitter considered that Option 3 allowed for the funding of the fire services to be rationalised and provided from one source.

One submitter considered that the funding model was the problem, rather than the governance model.

Some submitters were concerned about the affordability of the governance and support options. One submitter considered that Option 3 was not affordable under the current insurance based funding. Another submitter considered that it would be difficult to fund either Option 2 or 3.

### How rural stakeholders could contribute

There is a discussion above about whether local government should contribute to the funding of rural fire, under the heading ‘Local funding of rural fire’. There is also a discussion about cost recovery in the ‘Effective service delivery section’, under the ‘Powers and legislation’ heading.

Auckland Rural Fire Authority and Rayonier Matariki Forests both considered there should be a more equitable methodology for deciding contributions to rural fire funding. Two submitters, including the Marlborough Kaikoura Rural Fire Authority, considered that the rural firefighting fund should apply to all rural fires, including those originating in forests.

Two submitters commented on rates’ contributions to rural fire funding:

* rates remain the main source of funding rural fire on behalf of landowners, supplementing contributions from forestry companies, and the relevant government departments (Federated Farmers); and
* regions to collect funding via targeted rates (Wairarapa Rural Fire District).

Hastings District Council did not support a separate levy on farmers and forest owners, while the Far North District Council did not want a further burden on forest owners.

Five submitters proposed different ways for rural stakeholders to continue to contribute rural fire funding:

* establish inter-agency protocols with the Department of Conservation and forestry companies, which recognise the uniqueness of the assets in their protection, and the complexities involved in forest fires (Central Hawke’s Bay District Council);
* forest owners are responsible for their own firefighting and have a memorandum of cooperation with NZFS, as could the Department of Conservation (a rural fire force);
* a value based model for government funds e.g. for the Department of Conservation’s contribution to be based on biodiversity values for the forest rather than forest area (Far North District Council); and
* the landowner levy contributions should be based on risk across all landowners (not only forestry) and may be in cash, in kind or both (both Wenita Forest Products Limited and Forest Owners’ Association).

Three submitters, including LGNZ, also commented on the need to consider the value of the current local government contribution, including indirect support. If changes result in a reduced role for local government, the funding model will need to recognise the additional costs required. One of those submitters recommended that the current local government spending is diverted to the new organisation.

## 2.6 Submitters’ support for the governance and support options

In the discussion document, submitters were asked to select which options they preferred. The list of submitters and their option preference is also provided in Appendix Two.

### Method for selecting an option

The Department used the following process to confirm an option preference for each submitter:

* considering the option preference stated by the submitter in their submission;
* if the submitter had chosen Options 1, 2 or 3, considering whether the submitter wanted changes that were inconsistent with that option – in those situations, the Department noted the submission as supporting the option that is consistent with the changes sought (generally ‘other’). For example, some submitters chose Option 1, but also wanted compulsory amalgamation of ERFDs – the Department has categorised this as Option ‘other’ – a mix of Options 1 and 2; and
* if the submitter had chosen ‘other’ or did not indicate a preference, considering whether the comments in the submission clearly indicated an option preference – in those situations, the Department noted the submission as supporting the option that is consistent with their submission.

As noted above, the Department further categorised the ‘other’ options into: a mix of Options 1 and 2, a mix of Options 2 and 3, submissions based on outcomes or principles sought, and a step change approach with the goal of moving to Option 3.

### Submitters’ support for the governance and support options

In the discussion document, submitters selected one of the three governance and support options, or a mix of options. Although one option was selected by many submitters, this was often conditional support. For example, a submitter might have selected Option 3 but only if there was strong regional involvement or control. The figures on the following page show all submitters’ option selection (Figure 16), all organisations’ option selection (Figure 17) and individuals’ option selection (Figure 18).

**Figure 16:** Submitters’ support of governance and support options

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| --- | --- | --- | --- |
| **Figure 17:** Organisations’support of governance and support options   |  | | --- | |  | | **Figure 18:** Individuals’support of governance and support options   |  | | --- | |  | |

#### Submitters’ support of an ‘other’ option

Figure 16 shows submitters’ support for the three options in the discussion document. It also shows the percentage of submitters who made no selection or selected an ‘other option’. The Department analysed the ‘other’ options and categorised them as submissions that either:

* preferred Option 1 but with compulsory ERFDs for example, or a mix of Options 1 and 2 (15 submitters);
* preferred a mix of Options 2 and 3 (22 submitters);
* made a submission based on the outcomes or principles they would like to see in any changes to the fire services (19 submitters); or
* suggested a step change through different options, with the goal of moving eventually to Option 3 (six submitters).

#### Submitters’ support of the options by submitter type

More submitters supported Option 3 (81 submitters) than supported any other single option. Those that selected Option 3 included 22 of the 42 local authorities that made submissions and four of the 11 ERFDs, as well as the ERFD Chairs’ Group. Two of the three emergency services organisations also selected this option. The Professional Firefighters Union and the New Zealand Executive Fire Officers Society also supported Option 3, and nine of the rural fire forces.

The next most supported option was an ‘other’ option with 62 submitters. Thirteen of the local authorities selected this option with five seeking a mix of Options 1 and 2 and five seeking a mix of Options 2 and 3. The six ERFDs who selected ‘other’ did so because they were interested in a bigger Option 1 (one ERFD), a mix of options 2 and 3 (three ERFDs) or they thought that any change should be guided by outcomes or principles such as the involvement of the local community (two ERFDs).

Eight of the 11 submitters associated with the forestry sector selected ‘other’. Two were interested in a bigger Option 1, two in a mix of Options 2 and 3, and four focused on the outcomes or principles. LGNZ and the UFBA also supported an ‘other’ option, because they thought the option selection should focus on the outcomes or principles.

Twenty-seven submitters supported Option 2, with four local authorities, two ERFDs, Federated Farmers and one forestry organisation supporting this option. The main reason for submitters choosing Option 2 was because it delivers the benefit of some integration while retaining the separation of rural and urban fire services.

Twenty-one submitters supported Option 1, which included one local authority, one farming organisation and one forestry organisation.

Forty-four submitters also made ‘no selection’, in most cases this was because they were only commenting on the funding options.

Submitters’ support of the governance and support options based on their organisation is shown in the table below. Individuals are not included in the graph, to provide a clearer overview of the organisations’ option selection. Amongst the individuals: nine selected Option 1, seven selected Option 2, 31 selected option 3, 17 ‘other’ and 15 made no selection.

Figure : Submitters’ support of governance and support option by organisation type

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| --- |
|  |

#### Scale of change

Considering the support for the three options or ‘other’ option, it is clear that submitters were interested in:

* a small change: the 21 submitters (11 per cent) who selected Option 1; or
* a medium change: 42 submitters (22 per cent) – made up of the 27 submitters who selected Option 2 and the 15 submitters who selected ‘other’ options, which involved a bigger change than Option 1; or
* a large change: 109 submitters (57 per cent) – made up of the 81 submitters who selected Option 3 and the 28 submitters who selected ‘other’ options that involved a mix of Options 2 and 3, or an option that stepped through the changes from Option 1 to Option 3.

In addition, 19 submitters (10 per cent) selected ‘other’ options that focused on the outcomes or principles sought. The options in these submissions ranged from small to a large change.

# 3. Funding of the Commission

This section outlines comments from submitters on the funding options that were presented in the discussion document. It discusses the themes that arose from their submissions, such as reducing free riding and practical matters such as the simplicity of and ease of administration. Submitters also provided information about how the funding options could work in practice. Comments and discussion on rural funding are included in the discussion on the governance and support options.

## 3.1 Funding themes

This section focuses on submitters’ comments on aspects of the funding options. The two funding options presented in the discussion document were: Funding Option One: Enhanced Status Quo and Funding Option Two: Mixed Funding Model. The themes focus on the principled issues, such as concerns about fairness, and the practical issues, such as simplicity and administrative efficiency.

As in the discussion document, this section refers to the funding of the Commission for the NZFS’ activities and the contributions the Commission makes to rural fire.[[8]](#footnote-8) This section does not discuss submissions on the funding of rural fire at a local level. As in the discussion document, these submissions are discussed in relation to the governance and support options. However, this section does include submissions that drew a link between the funding options and the governance and support options. The table below shows the number of comments on each of the funding themes.

Figure : Number of comments on funding themes in submissions[[9]](#footnote-9)



### Fairness

Thirty-four submitters, including brigades, local authorities and insurance companies, considered that Funding Option 2 was fairer than Funding Option 1. This was variously described by submitters as fairness, equity and a closer relationship between cost and benefit. Another four submitters considered that Funding Option 1 was not fair or equitable.

Five submitters, being insurance companies, considered that the insurance-based levy system is inherently unfair. The submitters considered that the focus should therefore be on matters such as having an administratively simple system, keeping insurance affordable and encouraging insurance of assets.

### Reducing free riding

Thirty-three submitters, including brigades and local authorities, were concerned about property owners who chose not to insure, or to self-insure, while five submitters were concerned about under-insurance. Nine submitters noted that the government has the financial ability to self-insure and therefore pay less levy. Many of those submitters considered that a government contribution under Funding Option 2 would assist with this issue. Six submitters noted that funding for motor vehicle incidents from a non-insurance source would address the issue of motor vehicle owners who do not insure, or only have third party insurance.

Fourteen submitters, including brigades and local authorities, were concerned that property owners may be avoiding levy by insuring offshore. It should be noted that under the current levy system, people who own property in New Zealand are required to pay the fire service levy, whether or not they insure offshore. This was clarified in an amendment to the Fire Service Act in 1986. The Commission works with these organisations to ensure that they are aware of and meet their obligations under the Fire Service Act.

Two submitters were concerned about government-owned property being exempted from paying the levy. It should be noted that the government does not have an exemption from paying the levy. However, as noted above, the government has the ability to self-insure.

Four submitters, including the UFBA, were concerned about the potential under Funding Option 1 for property owners to use insurance contracts to minimise their levy payments. Another submitter noted that the recent Supreme Court decision[[10]](#footnote-10) would reduce the amount of leakage in levy paid.

Eleven submitters, including insurance companies and local authorities, considered that Funding Option 2 would reduce the effects of free riding, whether generally, under-insurance or non-insurance. Another 27 submitters, including rural fire stakeholders, were pleased that Funding Option 2 provided a wider funding base, which some submitters associated with reducing free riding or ensuring sufficient funding or stable funding for the Commission. However, three submitters were concerned that free riding would still occur under Funding Option 2.

### Reflecting the range of activities

Sixteen submitters, including insurance companies and rural fire stakeholders, considered that Funding Option 1 would not reflect the range of activities undertaken by the Commission, and one submitter said that it would. As the United Fire Brigades’ Association (UFBA) submitted:

The fact that fire insureds fund the delivery of non-fire services creates another inequity that further undermines confidence.

Forty-one submitters, including art galleries, rural fire stakeholders and insurance companies, considered that Funding Option 2 would better reflect the range of activities undertaken by the Commission. As the New Zealand Executive Fire Officers Society submitted:

This would improve the transparency and the basis on which many of the non fire related functions are carried out by the service. It will also assist our members in working cooperatively with other stakeholders to drive down non fire related risks to the community such as motor vehicle accidents.

### Sufficient and sustainable funding

Five submitters were concerned about the ability of Funding Option 1 to provide sufficient funding for the Commission, with five submitters considering that Funding Option 2 would be better at this. However, two submitters were concerned that it would be difficult to provide sufficient funding from the Police or health budgets as these were already stretched.

While one submitter considered that an advantage of Option 1 was that the Commission’s funding would not be affected by any changes in government, three submitters were concerned that Funding Option 2 could be affected by this.

### Practical matters

Option 1 was considered to be:

* simple and easy to understand (six submitters, including rural fire stakeholders);
* complicated (two submitters);
* difficult to administer (two submitters); and
* more transparent (one submitter).

Option 2 was considered to be:

* complicated to administer (four submitters);
* simpler to administer (two submitters); and
* more transparent (five submitters, including rural fire stakeholders).

## How the funding options could work – insurance

This section includes discussion of submissions on how an insurance funding model could work in practice. It looks at how the levy should be calculated on insurance, whether there should be a cap, whether a fixed or variable levy rate would work best, and what types of insurance contracts should be subject to the levy. Submissions also looked at the administration of the levy, including considerations for transition. The table below shows the number of comments submitters made on how the funding options could work in relation to insurance.

Figure : Number of comments on how the funding options could work – insurance



### What types of insurance contracts should be subject to the levy

Submitters considered if the levy should be calculated on:

* insurance contracts for fire risk or material damage (for non-residential property);
* insurance contracts for fire risk or third-party damage (for motor vehicles); and
* buildings or all types of property.

#### Material damage or fire risk insurance

Seven submitters, including AA Insurance Limited (AA Insurance) and the Insurance Council of New Zealand (ICNZ), considered that the levy should apply to all insurance contracts for material damage. ICNZ supports material damage as the basis for residential property as well as non-residential property.

In contrast, three submitters considered that the levy should continue to relate to fire insurance. While the Insurance Brokers Association of New Zealand (IBANZ) considered that basing the levy on material damage policies would reflect the range of activities undertaken, it also raised problems with this approach. IBANZ noted that currently, ‘material damage’ is a loose term for policies which cover a wide range of risks, and can vary between insurers. DHB Insurance Collective was concerned that applying the levy to material damage contracts would not reduce the risk of levy minimisation and could result in underinsurance.

#### Motor vehicle insurance

Two submitters considered that the levy should be extended to apply to motor vehicle insurance for third-party damage. One submitter noted this would be relatively easy for the insurance industry to implement as it would use existing systems.

#### Buildings or all types of property

Farmers’ Mutual Group considered that the levy should only be applied to buildings (and road registered vehicles). The submitter considered this would be simple to administer, would encompass all the current exemptions and limits the potential to minimise the levy. ICNZ disagreed in respect of commercial property as it considered that it would be unfair for building owners to subsidise fire and non-fire callouts related to machinery, plant and other commercial property.

In respect of residential property, ICNZ considered there was some merit in applying the levy to buildings only. ICNZ would like the fire service levy to align with the Earthquake Commission (EQC) premium and understands there is an indication from the Government to limit EQC cover to buildings.

### Ways to calculate levy on insurance

Submitters considered how the levy should be calculated on insurance – premium, sum insured or an alternative.

#### Levy based on insurance premium

Seven submitters, including art galleries, considered that the levy should be based on insurance premium. Of those submitters, three considered that a premium basis would allow those who took fire prevention measures to pay a reduced levy.

In its submission, the Property Council said:

Furthermore, we believe basing the levy on insurance premiums would reflect the underlying risk. Basing the levy on the sum-insured ignores the lengths that some property owners will go to mitigate risk to their assets: such as putting in place fire prevention systems like sprinklers.

Five submitters from the insurance industry considered that a premium based on levy would be less stable for the Commission’s revenue, as it could fluctuate depending on domestic and international market conditions. IBANZ also noted that the excess level chosen by the customer reduces the premium but does not reflect a different level of risk. Premiums are also affected by claims, location and the occupation of the customer. ICNZ disagreed with the Department’s analysis that a levy on premium would incentivise risk reduction.

#### Levy based on sum insured

Nine submitters, including AA Insurance, IBANZ and ICNZ, considered that the levy should be based on sum insured. Two submitters considered that the levy for non-residential property should be based on sum insured. Submitters considered that the sum insured is the simplest option to administer and would be easy to calculate. Other submitters also considered it would provide more certainty and stability for customers. ICNZ considered that a levy on sum insured would reduce levy minimisation.

Farmers’ Mutual Group supported sum insured, but noted it may be difficult to calculate in some circumstances. It submitted that the Commission should rely on the insurer’s valuation for these policies.

While IBANZ supported sum insured, it considered that the question of whether indemnity value or replacement value is used must still be resolved. It considered whatever value is used needs to be clearly defined in the legislation.

#### Other basis for levy

Three submitters considered that neither the insurance premium nor the sum insured offered options that would reflect the risk presented by different properties. Five other submitters considered that the levy for non-residential properties should be based on either the fire risk of the property, the risk and value of the property, or encourage the levy payers to reduce risk.

### Fixed rate or variable rate

Submitters considered whether the levy rate should be a fixed rate (i.e. the same rate for all property), a variable rate (a rate that varies depending on different factors) or a fixed charge (a dollar amount per property).

#### Fixed levy rate

Ten submitters, including IBANZ and Tower Insurance, supported a fixed rate levy. Another submitter considered that there should be a fixed rate on residential properties. ICNZ supported a fixed rate to be consistent with the EQC premium, which it understands will remain a fixed rate.

#### Variable levy rate

Three submitters considered that a variable rate would be better, as it could reflect risk. Another submitter considered that there should be a variable rate on non-residential properties. As the Christchurch Art Gallery put it:

We (like other galleries, libraries, archives and museums) operate from facilities installed with superior fire detection and suppression systems. We believe it is reasonable to request a variable rate based on evidence of fire compliance, thus deeming the fire risk as low. We appreciate this might be difficult and costly to administer but, in our opinion, this is fair.

Two submitters noted there was a risk that insurance companies and brokers would pass on the associated administration costs for a variable rate to customers.

Four submitters, including AA Insurance and Farmers’ Mutual Group, considered that a variable rate would be complex. One submitter considered that the costs in implementing new systems would outweigh any benefits of a variable levy rate.

#### Different rates for residential and non-residential property

Three submitters, including IBANZ and ICNZ, considered that the levy rate should be fixed, but different for residential and non-residential property. This could assist with ensuring the source of the levy revenue matches the costs of the Commission. Alternatively, the District Health Board Insurance Collective considered that the non-residential property owners should not pay an increased share of the levy. The submitter considered that this sector already has increased costs and reduced incidences of fire because of the requirements for fire prevention and protection.

#### What the levy rate should be

The Christchurch Art Gallery considered that the current levy rate of 76 cents per $100 sum insured impacts on their business and ability to maintain insurance cover. Another submitter considered that the levy rate for residential property should be reduced, so that residential levy payers are not subsidising the Commission’s costs that do not relate to residential property.

### Caps on residential property

#### Should there be a cap

Twelve submitters, including LGNZ and insurance companies, agreed there should be a cap on residential property, which would limit how much fire service levy is paid. Submitters considered a cap would reflect the similar cost of providing services to low and high value residential property, and considered that a high value property did not necessarily indicate ability to pay.

Alternatively, four submitters considered there should not be a cap on residential property. They supported an uncapped levy as it could recognise risk reduction measures, would reflect the property value and could indicate ability to pay. Another submitter considered that the cap should either be removed or amended to reflect the value of the property.

IBANZ agreed there were arguments for and against a cap on residential and non-residential property. It would want to see justification for a cap, showing that it is an improvement and not just added complexity and cost to the levy collection process.

#### How much the cap should be

Submitters variously suggested that:

* the cap should be $100,000 for houses of less than $500,000 value and $200,000 for houses over $500,000 on the basis that capital value is an indicator of ability to pay (one submitter);
* the cap should be better aligned to current house prices (one submitter);
* a cap of $200,000 for residential property and a higher cap for non-residential property (one submitter);
* the cap should align with the EQC levy on insurance (ICNZ, Tower Insurance and Farmers’ Mutual Group);
* the non-residential cap should be higher than the residential cap, and the residential cap should be raised as it has not changed since 1994, and the average residential property sale price has increased since then (District Health Board Insurance Collective); and
* the cap should increase, as currently those with higher value properties spend proportionally less on the levy, and because more valuable properties are in areas that receive a better fire service (LGNZ).

### Caps on non-residential property

Five submitters wanted a cap on non-residential property. The Christchurch Art Gallery noted that an art collection appreciates rather than depreciates, so a cap could prevent an increased levy over time.

In contrast, four submitters did not want a cap on non-residential property. ICNZ supported an uncapped levy as it would be simpler and easier to administer. ICNZ noted that the NZIER report it had commissioned[[11]](#footnote-11) recommended a cap on non-residential property, but that was in the context of recommending a rates-based system.

### Exemptions and other issues

Submissions about exemptions for rural property in relation to the rural fire funding system are addressed in the ‘How rural stakeholders could contribute’ section.

IBANZ considered that the current exemptions are well understood by the insurance industry and the Commission. In contrast, ICNZ, Tower Insurance and Farmers’ Mutual Group considered that working out when the exemptions apply can be complex and exemptions should be used sparingly. ICNZ submitted:

For example, hay is levied when in a barn but not in an open field. This is typical of the Schedule 3 exemptions to the Act which are simple in theory but difficult and costly to administer in practice.

ICNZ supported three possible exemptions: forests (discussed further in the ‘How rural stakeholders could contribute’ section), marine insurance policies and travel insurance. There are inconsistencies currently with which marine insurance policies are exempt and ICNZ considered it would be simpler to exempt all marine insurance and replace it with a cost recovery system.

Three submitters considered that property insured offshore needs to be subject to the levy. As noted in the ‘Funding themes’ section, offshore insurance currently is subject to the levy. Another submitter considered that the legislation needs to ensure the government pays its share of the levy. As noted in the ‘Funding themes’ section, there is no exemption for government owned property, though the government does have the ability to self-insure.

One submitter considered that one levy should be payable by a collective arrangement on the fire limit i.e. the decision reached in the High Court and Court of Appeal, but overturned by the Supreme Court in *New Zealand Fire Service Commission v Insurance Brokers Association of New Zealand Incorporated*.[[12]](#footnote-12)

### Administration of the levy

#### Simplifying the calculation and collection process

ICNZ made a number of suggestions in its submission about how to simplify the collection process, including:

* allowing insurers to comply with the audit requirements of the legislation electronically;
* removing the requirement to obtain a valuation and make a statutory declaration, if the levy is calculated on the basis of sum insured;
* requiring brokers to be responsible for collecting the levy and paying it to the Commission for brokered business;
* revising the rules about when the levy is due to the Commission to the point at which the insurer receives payment from the insured (as it can be some time from the beginning of an insurance policy to the first payment); and
* aligning the penalty regime with the Inland Revenue Department’s late payment regime, including allowing grace for honest mistakes. The submission compared the penalties for late payment between the Inland Revenue Department and the Commission.

Another submitter supported changes that would simplify calculation and collection, bringing down the administrative cost of collection. Tower Insurance supported the levy rate being reviewed every three years, instead of every year.

#### Fees for collection costs

Three submitters considered that insurance companies and brokers should be reimbursed for the cost of collecting the levy. ICNZ and Tower Insurance supported the alignment with the EQC system, which reimburses insurers to acknowledge the administrative costs of collection. ICNZ rejected any suggestion that insurers are receiving significant interest on levy payments from the start of the insurance contract until the levy money is paid to the Commission.

#### Implementing any changes

AA Insurance, ICNZ and Tower Insurance considered that they would need significant lead in time to comply with new legislation. These submitters also considered that that the timing of changes to the fire service levy should align with the timing of changes to the EQC’s premiums. The submitters set out required activities, including changing internal systems, aligning governance arrangements, testing changes, and allowing time for insurers to send out renewal documentation.

ICNZ suggested a lead in time of 9 – 12 months would be required, depending on how much change is made to the legislation and how simple the amendments are to understand, test and comply with.

## How the funding options could work – other matters

Submitters also commented on how the funding options could work in relation to motor vehicle and government contributions, as shown in the table below.

Figure : Number of comments on how funding options could work – other matters



### Government contribution

#### General comments about a government appropriation

Submitters considered a government appropriation would:

* be simple to administer (three submitters, including Carter Holt Harvey);
* provide flexibility as the Commission’s needs changed (two submitters);
* reflect the public good aspect of the fire services (ICNZ);
* provide Treasury oversight of Commission spending (ICNZ); and
* not create a significant problem with the Crown double paying for fire services (ICNZ).

Four submitters, including the District Health Board Insurance Collective, did not support a government appropriation. Some were concerned that the process relies on the approach of the government of the day and that the government budget processes are lengthy.

#### Government contribution to reflect under-insurance

Five submitters, including Federated Farmers, considered the government should provide a contribution to represent the share of its assets that are not insured. Another submitter considered the government should provide a greater share of funding to the Commission, rather than minimising its contribution through self-insurance or other methods.

National Services, Te Papa Tongarewa considered that the government should bear some cost of protecting public good institutions like museums and art galleries, especially those who cannot afford sufficient insurance.

#### Government contribution to reflect non-fire activities

Three rural fire stakeholders, including the ERFD Chairs’ Group, considered there should be a government appropriation for medical and Police assistance. Three submitters, including IBANZ and ICNZ, considered the government appropriation should relate directly to the costs of the non-fire activities. The District Health Board Insurance Collective supported the relevant government agencies contributing to the non-fire activities undertaken.

A number of submitters considered various ways the government could contribute to medical callouts. Some discussed this in relation to the fire services’ non-fire work generally, all medical callouts, while others separated out accidents and other medical calls. Submitters considered that medical callouts should be funded by:

* ACC (four submitters);
* the Ministry of Health or DHBs (one submitter);
* both the Ministry of Health and ACC (National Ambulance Sector Office) (one submitter);
* both ACC and DHBs (NZ Forest Managers);
* the budget process or DHBs (Federated Farmers);
* ACC for accidents and the Ministry of Health for other medical callouts (one submitter); and
* both Ministry of Health and ACC (National Ambulance Sector Office) for accidents and cost recovery for other medical callouts (District Health Board Insurance Collective).

St John Ambulance, Wellington Free Ambulance and Ambulance New Zealand supported the fire services attending medical emergencies, but would not support any negative impact on their funding that might result from this. The ambulances also considered that any new government funding for medical emergencies should be provided to the ambulance services.

One submitter queried how incidents such as hazardous substances would be treated – whether they would be funded through a direct charge or incorporated into a government appropriation.

### Motor vehicle contribution

#### Vehicle licensing

Eighteen submitters, including insurers and rural fire stakeholders, supported a charge on annual vehicle licensing (also known as ‘rego’). Seven submitters considered it would capture more motor vehicle owners than a levy on insurance. IBANZ also considered that removing the fire service levy from insurance could encourage people to take out insurance.

One submitter considered the registration levy would be relatively simple to collect, compared to insurance levies on vehicles. Two submitters, including ICNZ noted the recent reduction of ACC levies on vehicle registrations, which they considered would balance out a new fire service levy on registration.

Two local authorities noted their support for a levy on licensing was on the basis that it would not reduce any current New Zealand Transport Authority funding to local authorities. The Far North District Council was concerned about the high cost of registration and the impact on registration that adding another charge would have.

#### Road tax revenue

Five submitters supported funding vehicle related incidents from road tax revenue (which is funded from a variety of sources including road user charges, fuel tax and vehicle licensing). Two submitters were concerned that road tax revenue may charge some motorists multiple times while others, such as electric vehicle drivers, do not pay. The Property Council considered that using revenue from the National Land Transport Fund was inappropriate, as the purpose of this revenue is to fund the National Land Transport Programme.

#### A mixture of options

A number of submitters supported a mixture of options for a vehicle levy:

* a charge on either vehicle licensing or road tax revenue (four submitters, including the Inter Church Working Party);
* an insurance levy on vehicles that are not required to be licensed (NZ Forest Management);
* contributions from ACC and petrol tax (Central Hawkes Bay District Council);
* a fuel tax, if the funding model was equitable to all road users (Far North District Council); and
* attendance at motor vehicle incidents funded from vehicle licensing, and vehicle extrications funded from ACC (Auckland Volunteer Fire Brigade).

## 3.2 Funding option selection

The figure below outlines the percentage of submitters who supported each of the funding options from the discussion document.

**Figure 23**: Submitters’ support of funding options



### Support for Funding Option 2: Mixed Funding Model

More submitters supported Funding Option 2 than supported any other option, at 44 per cent (105 submitters). Twenty-one of the submitters who selected Funding Option 2 would have selected general tax, rates or both general tax and rates instead of Funding Option 2 if those options were available (see the table below).

Table 1: Submitters who would have selected rates or general tax if it was available

|  |  |
| --- | --- |
| **Preferred funding mechanism** | **Number of submitters** |
| General tax | 12 |
| Rates | 7 |
| General tax and rates | 2 |

### Support for ‘other’ funding option

The next most popular funding option was ‘other’ at 13 per cent (30 submitters). The other funding options selected by submitters are outlined in the table below.

Table 2: Other funding options supported in the submissions

| **Preferred funding mechanism** | **Number of submitters** |
| --- | --- |
| Combination | 22 |
| Rates | 3 |
| Tax | 3 |
| Emergency Services Levy | 2 |

### No selection of a funding option

It is important to note that a large number of submitters did not select or make distinctive comments on the funding options at 41 per cent (96 submitters). These submitters either mainly commented on the governance and support options, or made statements that the funding system should be fair and equitable but did not provide any preference on how this should be achieved.

### Submitters’ support of the options by submitter type

Most of the 105 submitters that supported Funding Option 2 were individuals (37 submitters), followed by local authorities (22 submitters), other organisations (12 submitters) and rural fire forces (nine submitters). Six of the seven insurance organisations that made submissions also supported this option. The chart below provides an overview of submitters’ support of the funding options by submitter type.

**Figure 24:** Submitters’ support of funding options by submitter type



## Other submissions on the funding options

### Specific comments on general taxation

Some submitters made specific comments on why they supported general taxation. Submitters considered that the Commission should be funded through general taxation because:

* it would address the free rider issue (eight submitters);
* the Commission provides a public good (seven submitters);
* it would be cost effective (seven submitters);
* it would remove the confusing legislation that has given rise to levy minimisation (five submitters);
* it would be relatively stable and predictable (five submitters);
* funding decisions would be subject to Treasury scrutiny, which may increase the Commission’s accountability and efficiency (five submitters);
* it would be simple and transparent (three submitters);
* it would be economically efficient (two submitters);
* it would be consistent with the funding of other government services (two submitters); and
* it would reflect the range of activities undertaken by the Commission and those who benefit (two submitters).

Two submitters noted that the majority of submissions to the Fire Review Panel in 2012 supported general taxation to fund the Commission. Two submitters also noted that a number of reviews have supported general taxation as the funding mechanism. One submitter considered all the alternative funding options would be complicated to administer and inequitable. Two submitters considered general taxation would be a more appropriate funding mechanism if Option 3 were chosen. Seven submitters were disappointed and concerned that the discussion document did not include general taxation as an option for consultation. Another submitter considered the discussion document did not explain why the option was excluded.

### Specific comments on rates

Submitters also commented about using rates as a source of funding the Commission. Ten submitters considered that rates would address the problem of free riding. Another three submitters considered that rates would be a fair source of funding. One submitter considered that rates-based funding would be more robust than an insurance levy.

Forest Management (NZ) Limited supported rates as all properties are zoned and rated, so the levy could include a risk factor. All property could be included, except for land where the owners take responsibility for their own fire suppression.

In contrast, five local authorities agreed that rates should not be used to fund the Commission. For example, New Plymouth District Council noted that rates are already under considerable pressure. South Wairarapa District Council thought the removal of rates based funding would give rural ratepayers a fairer deal. Four submitters were disappointed and concerned that the discussion document did not include general taxation as an option for consultation.

### Other funding models

Several submitters suggested other funding models:

* insurance companies to pay a percentage of their fire premium income to the Commission, with the balance provided by the government (Inter Church Working Party on Taxation);
* a mixture of a levy on property value, contents insurance, motor vehicle registration and other options outlined in Funding Option 2 (one submitter); and
* a mixture of levy on insurance, property value, motor vehicle registration based on a risk history (one submitter).

One submitter considered there should be a separate charging system for attending private fire alarms.

Several submitters made submissions that multiple emergency services should be funded together. The types of agencies suggested included the fire services, ambulances, civil defence, surf lifesaving and coastguard.

Two submitters considered there were not enough details on the options to decide which to support. Another submitter considered that further options for non-residential property needed to be explored, as the discussion document did not introduce a fair model.

### Outside the scope of the review

Some submitters raised issues that are related to the funding model, but outside the scope of this review. Three submitters considered that insurance should be compulsory, so that all parties can contribute to the fire service levy. Three submitters considered that motor vehicle insurance, or third-party motor vehicle insurance, should be compulsory.

One submitter approved of the indemnity provided by the Ministry for Culture and Heritage for the exhibition of international art and museum collections. The submitter considered this indemnity model could extend to other exhibitions or collections as well.

# 4. Monitoring and process

## More transparency and accountability

Twelve submitters discussed the need to improve the transparency and accountability for fire services and that this should be subject to greater scrutiny. As IBANZ said in its submission:

The process has to be more transparent and consultative about the levy rate and the budget that forms the basis of the rate. There needs to be clarity for those paying the fire service costs just what they are getting for their contribution.

Two of those submitters also requested involvement in the decision making process as levy payers. One submitter also commented on the need to improve transparency in the current ERFD model and hold ERFDs accountable for their decisions, and provide a clear process for the appointment or removal of board members.

On the other hand, one submitter said that the current publication of annual financial statements by the fire services was sufficient and that the public was not too concerned about this.

## How to improve monitoring

Sixteen submitters recommended ways that effective monitoring and coordination during the transition phase can enable effective service delivery.

Five submitters recommended that the funding of the fire services should be transparent and subject to Treasury scrutiny, particularly if there is a Crown appropriation under Funding Option 2, the mixed funding model. Two submitters also recommended that the entity that delivers the services should not audit and set their own standards, with one submitter saying that:

In summary how can anyone think it is a good idea to have one entity set the standards, delivers on the standards and the report on meeting those standards with no external input and review!

Other comments from submitters on how to improve monitoring included:

* introducing intervention mechanisms for under-performance;
* establishing one organisation to streamline monitoring and performance;
* consulting on the setting of the levy rate and when periodically reviewing the levy rate;
* reporting on diversity;
* undertaking three yearly reviews of the fire services levy; and
* considering another organisation monitor the Fire Service Commission, other than the Department of Internal Affairs.

## Comments on the process

As well as submissions focusing on the issues facing the fire services and the options set out in the discussion document, the Department received a number of submissions that criticised the information provided in the discussion document, including the discussion of the problems and the costs of the options (16 submitters).

Some submitters also criticised the consultation process, including the short amount of time for submitters to read and consider the discussion document and the lack of direct engagement in some parts of the country (four submissions).

# Appendix One: List of government agencies involved in the review

The Fire Services review Project Team includes the Department of Internal Affairs, the New Zealand Fire Service and the National Rural Fire Authority.

The following Government agencies have been involved in the policy development process with the Fire Services Review Team:

* Accident Compensation Corporation
* Canterbury Earthquake Recovery Authority
* Department of Conservation
* Department of Internal Affairs’ Local Government team
* Department of Internal Affairs’ Community and Voluntary Sector team
* Department of Prime Minister and Cabinet
* Maritime New Zealand
* Ministry of Business, Innovation and Employment
* Ministry of Civil Defence and Emergency Management
* Ministry for the Environment
* Ministry of Culture and Heritage
* Ministry of Defence
* Ministry of Education
* Ministry of Health, including the National Ambulance Sector Office
* Ministry for Primary Industries
* Ministry of Transport
* New Zealand Defence Force
* New Zealand Police
* State Services Commission
* The Treasury
* WorkSafe New Zealand

# Appendix Two: Submitter details

List of submitters and their option preference

The list below indicates the submitters, what type of organisation they are, their option preference and if a submitter supported another submitter’s submission. There is also some information about some organisations; this was taken from their submission.

In the discussion document, submitters were asked to select which options they preferred. The Department used the following process to confirm an option preference for each submitter:

* considering the option preference stated by the submitter in their submission;
* if the submitter had chosen Options 1, 2 or 3, considering whether the submitter wanted changes that were inconsistent with that option – in those situations, the Department noted the submission as supporting the option that is consistent with the changes sought (generally ‘other’). For example, some submitters chose Option 1, but also wanted compulsory amalgamation of ERFDs – the Department has categorised this as Option other – a mix of Options 1 and 2; and
* if the submitter had chosen ‘other’ or did not indicate a preference, considering whether the comments in the submission clearly indicated an option preference – in those situations, the Department noted the submission as supporting the option that is consistent with their submission.

As noted above, the Department further categorised the ‘other’ options into a mix of Options 1 and 2, a mix of Options 2 and 3, submissions based on outcomes or principles sought, and a step change approach with the goal of moving to Option 3.

Note: while 235 submissions were received, the numbering of submissions goes up to 236. After all submissions were logged, submission number 174 was discovered to be a duplicate submission and was removed.

| # | Submitter name | Organisation Type | Governance and support option | Other governance and support option description | Funding option | Alternative to Funding Option 2 or other Funding option |
| --- | --- | --- | --- | --- | --- | --- |
|  | Vance Walker | Individual | Option 3 |  | Funding Option 2 |  |
|  | Svetlana Lushkott | Individual | Option 3 |  | Funding Option 2 |  |
|  | Andrew Fitzsimons | Individual | Option 3 |  | Funding Option 2 |  |
|  | Robert Carter | Individual | Option 3 |  | Funding Option 2 |  |
|  | Andrew Robinson | Individual | Option 2 |  | Funding Option 2 |  |
|  | Anthony Winter | Individual | Option 3 |  | Other | Tax |
|  | Glen Callanan | Individual | No selection |  | Other | Rates |
|  | Gerry Stanley | Individual | Option 1 |  | Funding Option 2 | Rates |
|  | Bryan Hayes | Individual | No selection |  | No selection |  |
|  | Benjamin Alton | Individual | Option 3 |  | Funding Option 2 |  |
|  | Bryan Williamson | Individual | No selection |  | No selection |  |
|  | Timaru District Council | Local authority | Option 3 |  | No selection |  |
|  | Andy Luffman | Individual | Option 3 |  | Funding Option 2 |  |
|  | Wayne Stevens | Individual | No selection |  | No selection |  |
|  | Hutt City Council officers | Local government | Option 3 |  | Funding Option 2 |  |
|  | Kerry Hilliard | Individual | Other | Option 1 plus | No selection |  |
|  | Brian Davey | Individual | Option 3 |  | Funding Option 2 |  |
|  | Brent Mortenson | Individual | Option 3 |  | No selection |  |
|  | Daniel Voss | Individual | Option 1 |  | No selection |  |
|  | Peter Robertson | Individual | Option 3 |  | Funding Option 2 |  |
|  | *Submission withheld under Official Information Act 1982* | Individual | Option 3 |  | Other | Combination |
|  | Tararua District Council | Local authority | Option 1 |  | Funding Option 2 |  |
|  | Wellington Free Ambulance, St John Ambulance and Ambulance New Zealand | Emergency services | Option 3 |  | No selection |  |
|  | Matamata Volunteer Fire Brigade | NZFS brigade[[13]](#footnote-13) | Option 2 |  | Funding Option 2 |  |
|  | Waikato District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Allan Jones | Individual | Option 3 |  | Funding Option 2 |  |
|  | Rangitikei District Council | Local authority | No selection |  | No selection |  |
|  | Waitakere Volunteer Fire Brigade | NZFS brigade | Option 3 |  | Funding Option 2 |  |
|  | New Plymouth District Council | Local authority | Option 3 |  | No selection |  |
|  | Mathew Bannister | Individual | Option 3 |  | Funding Option 2 |  |
|  | Blackmount Rural Fire Force | Rural fire force | Other | Option 2 plus 3 | Funding Option 2 | Rates |
|  | Xan Harding | Individual | Option 3 |  | Funding Option 2 |  |
|  | Wainuiomata Bushfire Force | Rural fire force | Option 3 |  | No selection |  |
|  | Foodstuffs (NZ) Limited | Other organisation | No selection |  | Funding Option 2 | Tax |
|  | David Hilliard | Individual | Other | Option 2 plus 3 | Other | Combination |
|  | Rescue 3 New Zealand | Emergency services[[14]](#footnote-14) | Option 3 |  | Other | Emergency services levy |
|  | Bluff Volunteer Fire Brigade | NZFS brigade[[15]](#footnote-15) | Option 3 |  | Funding Option 2 | Tax |
|  | Alan Thompson | Individual | No selection |  | No selection |  |
|  | Nigel Dravitzki | Individual | Other | Stepped change through options | Other | Combination |
|  | Real Estate Institute of New Zealand | Other organisation[[16]](#footnote-16) | No selection |  | Funding Option 2 | Tax |
|  | Michael Taylor | Individual | Option 1 |  | No selection |  |
|  | Dunstan Rural Fire Force[[17]](#footnote-17) | Rural fire force | Option 1 |  | Funding Option 1 |  |
|  | Murray Dudfield | Individual | Option 1 |  | Other | Combination |
|  | Waikuku Beach Volunteer Rural Fire Force | Rural fire force | Option 2 |  | No selection |  |
|  | Chris Lind | Individual | Option 3 |  | Funding Option 2 |  |
|  | Levin Rural Fire Force | Rural fire force | Other | Option 2 plus 3 | No selection |  |
|  | Makarora Volunteer Rural Fire Service[[18]](#footnote-18) | Rural fire force | Other | Option 1 plus | No selection |  |
|  | Hydro Response Limited | Other organisation[[19]](#footnote-19) | Option 3 |  | Other | Emergency services levy |
|  | Wanganui Rural Community Board | Local government | Option 3 |  | Funding Option 2 |  |
|  | Carter Holt Harvey Pulp & Paper Limited | Other organisation[[20]](#footnote-20) | Option 3 |  | Funding Option 2 |  |
|  | Andrew Sims | Individual | Other | Option 2 plus 3 | Funding Option 2 |  |
|  | Brian Hunter | Individual | Option 2 |  | Funding Option 2 | Rates |
|  | Colin Russell | Individual | No selection |  | No selection |  |
|  | JD Associates | Other organisation | Other | Stepped change through options | Funding Option 2 |  |
|  | Greytown Volunteer Fire Brigade | NZFS brigade[[21]](#footnote-21) | Option 3 |  | No selection |  |
|  | Matthew Whyte | Individual | Option 3 |  | Funding Option 2 |  |
|  | Steven Banks | Individual | Option 3 |  | Funding Option 2 |  |
|  | Scott Butcher | Individual | No selection |  | No selection |  |
|  | Hampden Rural Fire Force[[22]](#footnote-22) | Rural fire force | Option 1 |  | No selection |  |
|  | Millers Flat Fire Brigade | NZFS brigade[[23]](#footnote-23) | Option 1 |  | Funding Option 2 |  |
|  | Kevin Klempel | Individual | Option 3 |  | Funding Option 2 |  |
|  | Maramarua Rural Fire Force | Rural fire force[[24]](#footnote-24) | Option 3 |  | Funding Option 2 | Rates |
|  | Voluntary Rural Fire Forces of the Waimea Rural Fire District | Rural fire force[[25]](#footnote-25) | Option 2 |  | Funding Option 2 | Tax and rates |
|  | NZ Land Search & Rescue Inc. | Emergency services[[26]](#footnote-26) | No selection |  | No selection |  |
|  | Great Barrier Island Voluntary Rural Fire Force | Rural fire force | Option 3 |  | Other | Tax |
|  | Kevin Marsh | Individual | Option 1 |  | No selection |  |
|  | Richard Gaddum | Individual | Other | Outcomes/principles | No selection |  |
|  | Horowhenua District Council[[27]](#footnote-27) | Local authority | Other | Outcomes/principles | No selection |  |
|  | John Allen | Individual | Option 3 |  | No selection |  |
|  | Volunteer firefighters, Hanmer Springs | NZFS brigade | Option 3 |  | No selection |  |
|  | Phil Melhopt | Individual | Option 2 |  | No selection |  |
|  | Paekakariki Volunteer Fire Brigade | NZFS brigade | Other | Stepped change through options | Funding Option 2 |  |
|  | Waimakariri District Council[[28]](#footnote-28) | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Keith Marshall | Individual | Option 2 |  | Funding Option 2 |  |
|  | Inter Church Working Party on Taxation | Other organisation[[29]](#footnote-29) | No selection |  | Funding Option 2 | Tax |
|  | Ken Clarke | Individual | Option 3 |  | No selection |  |
|  | Hauraki District Council[[30]](#footnote-30) | Local authority | Other | Option 2 plus 3 | Funding Option 2 |  |
|  | Central Hawke's Bay District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Rural Fire Network | Rural fire[[31]](#footnote-31) | Option 2 |  | No selection |  |
|  | Teviot Valley Rural Fire Volunteers[[32]](#footnote-32) | Rural fire force | Option 1 |  | Funding Option 2 | Rates |
|  | Merlin Astley-Jones | Individual | Option 3 |  | Other | Combination |
|  | Waimārama Volunteer Rural Fire Force | Rural fire force | Other | Outcomes/principles | No selection |  |
|  | Kenepuru & Central Sounds Residents Association Inc. | Other organisation[[33]](#footnote-33) | Option 2 |  | No selection |  |
|  | Clutha District Council | Local authority | Other | Option 1 plus 2 | Funding Option 2 |  |
|  | Ashburton District Council | Local authority | Option 2 |  | Funding Option 2 |  |
|  | Dallas Henley | Individual | Option 1 |  | No selection |  |
|  | Pumicelands Rural Fire Authority | ERFD | Other | Option 2 plus 3 | No selection |  |
|  | Featherston Volunteer Fire Brigade | NZFS brigade[[34]](#footnote-34) | Option 1 |  | Funding Option 1 |  |
|  | Rarangi Rural Fire Force | Rural fire force | Option 3 |  | Funding Option 2 |  |
|  | Waipa District Council[[35]](#footnote-35) | Local authority | Other | Option 2 plus 3 | No selection |  |
|  | Selwyn District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Motunau Rural Fire Force | Rural fire force[[36]](#footnote-36) | Option 2 |  | Funding Option 2 |  |
|  | Scion | Other organisation | Option 2 |  | No selection |  |
|  | Wellington City Council[[37]](#footnote-37) | Local authority | Option 3 |  | Funding Option 2 |  |
|  | AA Insurance Limited[[38]](#footnote-38) | Insurance[[39]](#footnote-39) | Other | Option 2 plus 3 | Funding Option 2 | Tax |
|  | Marlborough Kaikoura Rural Fire Authority | ERFD | Other | Option 2 plus 3 | No selection |  |
|  | John Foley | Individual | Other | Option 2 plus 3 | No selection |  |
|  | Christchurch Art Gallery | Other organisation | No selection |  | Funding Option 2 |  |
|  | Central Otago District Council (Mayor, Deputy Mayor and Chief Executive Officer) | Local authority | Option 3 |  | No selection |  |
|  | West Coast Rural Fire Authority | ERFD | Option 3 |  | Funding Option 2 |  |
|  | Tora Volunteer Rural Fire Force | Rural fire force | Option 3 |  | No selection |  |
|  | Whangarei District Council | Local authority | Option 3 |  | No selection |  |
|  | NZ Executive Fire Officers Society | Workforce representative[[40]](#footnote-40) | Option 3 |  | Funding Option 2 |  |
|  | Wenita Forest Products Limited | Forestry[[41]](#footnote-41) | Other | Option 1 plus | Funding Option 2 |  |
|  | Nelson City Council | Local authority | Other | Option 2 plus 3 | Funding Option 2 |  |
|  | Gore Volunteer Fire Brigade | NZFS brigade[[42]](#footnote-42) | Option 2 |  | Funding Option 2 |  |
|  | Forest Management (NZ) Limited | Forestry | Other | Outcomes/principles | Other | Combination |
|  | Waihopai Rural Fire Force | Rural fire force | Other | Option 2 plus 3 | No selection |  |
|  | Auckland Rural Fire Authority | ERFD[[43]](#footnote-43) | Option 3 |  | Other | Combination |
|  | Steve Lee | Individual | Option 2 |  | Funding Option 2 |  |
|  | Justin Murtha | Individual | Option 3 |  | Other | Tax |
|  | Wainuioru Rural Fire Force | Rural fire force[[44]](#footnote-44) | No selection |  | No selection |  |
|  | John Barnes | Individual | No selection |  | No selection |  |
|  | Ōpōtiki District Council[[45]](#footnote-45) | Local authority | No selection |  | Other | Combination |
|  | South Canterbury Rural Fire Authority | ERFD | Option 2 |  | No selection |  |
|  | Riverton Volunteer Fire Brigade | NZFS brigade[[46]](#footnote-46) | Option 2 |  | No selection |  |
|  | Wellington Rural Fire Force | Rural fire force | Option 3 |  | No selection |  |
|  | Tristan | Individual | Other | Option 2 plus 3 | Other | Combination |
|  | Michael Vincent | Individual | Option 3 |  | Funding Option 2 |  |
|  | Far North District Council | Local authority | Other | Stepped change through options | Funding Option 2 |  |
|  | Amber Hollis | Individual | Other | Option 2 plus 3 | Other | Combination |
|  | Mike van Bysterveldt | Individual | No selection |  | Other | Combination |
|  | William Dowling | Individual | Option 2 |  | Funding Option 2 |  |
|  | Waitaki Volunteer Rural Fire Force[[47]](#footnote-47) | Rural fire force[[48]](#footnote-48) | Other | Option 1 plus | No selection |  |
|  | Maraekakaho Volunteer Rural Fire Force | Rural fire force[[49]](#footnote-49) | Option 3 |  | Funding Option 2 |  |
|  | Alistair Nicoll | Individual | Option 3 |  | Funding Option 2 |  |
|  | Heretaunga Rural Fire Force | Rural fire force | Other | Option 2 plus 3 | Funding Option 2 |  |
|  | Alan Johnson | Individual | Option 3 |  | Funding Option 2 |  |
|  | *Submission withheld under Official Information Act 1982* | Individual | No selection |  | No selection |  |
|  | Auckland Provincial Fire Brigades’ Association Executive | Workforce representative[[50]](#footnote-50) | No selection |  | No selection |  |
|  | Cambridge Volunteer Fire Brigade | NZFS brigade[[51]](#footnote-51) | Option 1 |  | Funding Option 2 |  |
|  | Richard Johns | Individual | Other | Outcomes/principles | Funding Option 2 | Rates |
|  | Daryl Meikle | Individual | No selection |  | No selection |  |
|  | Farming Members of the Upper Clutha Vegetation Control Group | Farming | Option 1 |  | No selection |  |
|  | Janet Scott | Individual | Option 1 |  | No selection |  |
|  | Omakau Volunteer Fire Brigade and Blackstone Rural Fire Force[[52]](#footnote-52) | Fire brigade (both rural and NZFS brigade) | Option 1 |  | No selection |  |
|  | Blenheim Volunteer Fire Brigade | NZFS brigade[[53]](#footnote-53) | Other | Option 2 plus 3 | No selection |  |
|  | Eastern Regional Rural Fire Committee | Rural fire | Other | Outcomes/principles | No selection |  |
|  | Awhitu Rural Fire Force | Rural fire force[[54]](#footnote-54) | Option 3 |  | No selection |  |
|  | Gisborne District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Tasman District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Otago Volunteer Rural Fire Forces | Rural fire force | No selection |  | No selection |  |
|  | Steph Rotarangi | Individual | Other | Option 1 plus | Other | Rates |
|  | Joy Bell Angus | Individual | Other | Outcomes/principles | No selection |  |
|  | Wairarapa Rural Fire District | ERFD | Other | Option 2 plus 3 | Funding Option 2 |  |
|  | Property Council | Other organisation[[55]](#footnote-55) | No selection |  | Funding Option 2 | Tax |
|  | Darren and Barbara Searle | Individual | Option 3 |  | Funding Option 2 |  |
|  | Waikanae Volunteer Fire Brigade | NZFS brigade | Other | Stepped change through options | No selection |  |
|  | Energy Trusts of New Zealand Inc. | Other organisation[[56]](#footnote-56) | No selection |  | No selection |  |
|  | Enlarged Rural Fire District Chairs' Group | ERFD[[57]](#footnote-57) | Option 3 |  | Other | Combination |
|  | Palmerston North City Council | Local authority | Option 3 |  | No selection |  |
|  | Juken New Zealand Limited | Forestry[[58]](#footnote-58) | Other | Option 2 plus 3 | Other | Combination |
|  | Dave Kingsbury | Individual | No selection |  | No selection |  |
|  | Western Bay of Plenty District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Waimea Rural Fire Authority | ERFD[[59]](#footnote-59) | Other | Outcomes/principles | Funding Option 2 |  |
|  | Waimate District Council | Local authority | Other | Option 1 plus | Funding Option 2 |  |
|  | Great Barrier Local Board | Local government | Option 3 |  | No selection |  |
|  | Hastings District Council | Local authority | Other | Outcomes/principles | Other | Combination |
|  | South Wairarapa District Council | Local authority | Other | Option 2 plus 3 | Funding Option 2 | Tax |
|  | Michael Sullivan | Individual | Option 1 |  | Funding Option 2 |  |
|  | Waiwhare Volunteer Rural Fire Force | Rural fire force[[60]](#footnote-60) | Option 1 |  | No selection |  |
|  | Christchurch City Council | Local authority | Other | Option 1 plus | Funding Option 2 |  |
|  | Wairoa District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Vero Insurance New Zealand Limited[[61]](#footnote-61) | Insurance[[62]](#footnote-62) | No selection |  | Funding Option 2 |  |
|  | Forest and Rural Fire Association of New Zealand Management Committee | Workforce representative | No selection |  | No selection |  |
|  | Graeme Booth | Individual | Option 3 |  | Funding Option 2 | Tax |
|  | Ruapehu District Council | Local authority | Option 3 |  | Funding Option 1 |  |
|  | Trevor Mitchell | Individual | Other | Outcomes/principles | Funding Option 2 |  |
|  | Bay Forests Rural Fire Committee | Rural fire | Other | Outcomes/principles | Other | Combination |
|  | Gisborne Volunteer Rural Fire Force | Rural fire force[[63]](#footnote-63) | Other | Stepped change through options | Funding Option 2 |  |
|  | Otago Rural Fire Authority | ERFD[[64]](#footnote-64) | Other | Option 1 plus | No selection |  |
|  | Matamata-Piako District Council | Local authority | Option 2 |  | No selection |  |
|  | Gordon Foster | Individual | Option 3 |  | Funding Option 2 |  |
|  | Removed as a duplicate. |  |  |  |  |  |
|  | National Services Te Paerangi - Museum of New Zealand Te Papa Tongarewa | Other organisation | No selection |  | Funding Option 2 |  |
|  | Farmers’ Mutual Group | Insurance | Option 2 |  | Funding Option 2 |  |
|  | Greater Wellington Regional Council | Local authority | Option 3 |  | No selection |  |
|  | Kaiaua Volunteer Rural Fire Force | Rural fire force | Option 3 |  | Other | Combination |
|  | Paul Hope | Individual | No selection |  | No selection |  |
|  | Southern Rural Fire Authority | ERFD[[65]](#footnote-65) | Other | Outcomes/principles | Other | Combination |
|  | Mark Davidson | Individual | Other | Option 1 plus | Other | Rates |
|  | Volunteering New Zealand | Other organisation[[66]](#footnote-66) | No selection |  | No selection |  |
|  | Manawatu District Council | Local authority | Option 3 |  | No selection |  |
|  | Auckland Volunteer Fire Brigade | NZFS brigade[[67]](#footnote-67) | No selection |  | No selection |  |
|  | Kerry O’Neill | Individual | Other | Option 1 plus | Other | Combination |
|  | National Park Volunteer Fire Brigade | NZFS brigade[[68]](#footnote-68) | Option 2 |  | No selection |  |
|  | Kevin Ihaka | Individual | Option 1 |  | Funding Option 2 |  |
|  | Hurunui District Council | Local authority | Option 3 |  | No selection |  |
|  | Canterbury Mayoral Forum[[69]](#footnote-69) | Local government | No selection |  | No selection |  |
|  | Waitaki District Council[[70]](#footnote-70) | Local authority | Other | Option 1 plus | Funding Option 2 |  |
|  | District Health Board Insurance Collective | Insurance | No selection |  | No selection |  |
|  | Mackenzie District Council[[71]](#footnote-71) | Local authority | Other | Option 1 plus | No selection |  |
|  | Peter Houston | Individual | Other | Outcomes/principles | Funding Option 2 |  |
|  | Keith McIntosh | Individual | Option 3 |  | Funding Option 2 |  |
|  | Tom Broderick | Individual | Option 2 |  | No selection |  |
|  | Karl Tutty | Individual | Other | Option 2 plus 3 | Funding Option 2 |  |
|  | Masterton District Council[[72]](#footnote-72) | Local authority | Option 2 |  | No selection |  |
|  | Pendarves Volunteer Rural Fire Force | Rural fire force[[73]](#footnote-73) | Option 2 |  | No selection |  |
|  | South Waikato District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | PF Olsen Ltd, Nelson | Forestry[[74]](#footnote-74) | Option 2 |  | Funding Option 2 |  |
|  | Forest Owners Association | Forestry[[75]](#footnote-75) | Other | Outcomes/principles | Other | Combination |
|  | Sandra Gifkins | Individual | Option 3 |  | No selection |  |
|  | Electricity Networks Association | Other organisation[[76]](#footnote-76) | No selection |  | Funding Option 2 | Tax |
|  | New Zealand Taxpayers’ Union | Other organisation | No selection |  | No selection |  |
|  | Insurance Brokers Association of NZ Inc. | Insurance[[77]](#footnote-77) | No selection |  | Funding Option 2 |  |
|  | Insurance Council of New Zealand | Insurance[[78]](#footnote-78) | No selection |  | Funding Option 2 | Tax and rates |
|  | Regional Facilities Auckland | Other organisation[[79]](#footnote-79) | No selection |  | Funding Option 2 |  |
|  | Thames-Coromandel District Council | Local authority | Option 3 |  | No selection |  |
|  | New Zealand Forest Managers Ltd | Forestry | Option 1 |  | Funding Option 2 |  |
|  | Tower Insurance Limited[[80]](#footnote-80) | Insurance | No selection |  | Funding Option 2 | Tax |
|  | Rayonier Matariki Forests | Forestry[[81]](#footnote-81) | Other | Outcomes/principles | No selection |  |
|  | Waitomo District Council | Local authority | Option 3 |  | Funding Option 2 |  |
|  | Electricity Engineers'  Association of New Zealand[[82]](#footnote-82) | Other organisation[[83]](#footnote-83) | No selection |  | No selection |  |
|  | Action Forest Management Limited | Forestry | Other | Option 2 plus 3 | No selection |  |
|  | Wellington Rural Fire Authority[[84]](#footnote-84) | ERFD | Option 3 |  | No selection |  |
|  | Kawerau District Council[[85]](#footnote-85) | Local authority | Option 2 |  | No selection |  |
|  | Ian Fielder | Individual | Other | Option 1 plus | No selection |  |
|  | Taranaki Rural Fire Authority | ERFD | Option 2 |  | Funding Option 2 |  |
|  | Peel Forest Rural Fire Unit[[86]](#footnote-86) | Forestry[[87]](#footnote-87) | Other | Option 1 plus | No selection |  |
|  | Maungakaramea Voluntary Rural Fire Force | Rural fire force | Other | Outcomes/principles | No selection |  |
|  | Judith and Geoff Marks | Individual | No selection |  | No selection |  |
|  | Ernslaw One Limited | Forestry | Other | Outcomes/principles | Other | Combination |
|  | Waiau Fire Brigade | Fire brigade (both rural and NZFS brigade)[[88]](#footnote-88) | Option 3 |  | Funding Option 1 |  |
|  | Omarama Rural Fire Force[[89]](#footnote-89) | Rural fire force | No selection |  | No selection |  |
|  | Local Government New Zealand | Local government | Other | Outcomes/principles | Funding Option 2 |  |
|  | Federated Farmers of New Zealand | Farming[[90]](#footnote-90) | Option 2 |  | Other | Combination |
|  | Rarangi District Residents Association | Other organisation | Option 3 |  | Funding Option 2 |  |
|  | Carterton District Council | Local authority | Other | Option 2 plus 3 | No selection |  |
|  | Business New Zealand | Other organisation[[91]](#footnote-91) | No selection |  | Funding Option 2 | Tax |
|  | Stuart Jones | Individual | Option 3 |  | Funding Option 2 |  |
|  | Colin Wilson | Individual | No selection |  | Funding Option 2 |  |
|  | New Zealand Farm Forestry Association | Forestry[[92]](#footnote-92) | No selection |  | Other | Combination |
|  | United Fire Brigades Association | Workforce representative[[93]](#footnote-93) | Other | Outcomes/principles | No selection |  |
|  | Professional Firefighters Union | Workforce representative[[94]](#footnote-94) | Option 3 |  | Funding Option 2 |  |
|  | Aviation New Zealand[[95]](#footnote-95) | Other organisation | Option 1 |  | No selection |  |
|  | Wanganui District Council | Local authority | Option 3 |  | Funding Option 2 | Tax |

# Appendix Three: Regional meetings

During the consultation period (27 May to 10 July), the Minister of Internal Affairs, Hon Peter Dunne (the Minister) and the Associate Minister of Local Government, Hon Louise Upston and the review project team visited a number of regions. At each meeting, Ministers and the review project team met with local firefighters and rural fire stakeholders such as local authority representatives, farmers, forestry owners and Department of Conservation staff.

The areas and dates of the meetings were:

* Timaru on 28 May
* Ashburton on 28 May
* Palmerston North on 4 June
* Kapiti on 4 June
* Northland on 8 June
* Southland on 10 June
* Rotorua on 12 June
* Tawa on 15 June
* Auckland on 15 and 16 June
* Cambridge on 19 June
* Nelson on 19 June
* Wairarapa on 22 and 29 June
* Christchurch on 25 June
* Taupō on 26 June
* Tokoroa on 26 June
* Queenstown on 27 June
* Napier on 2 July
* Hunua on 7 July

Regional meetings summary

This is a summary of feedback from the 18 regional meetings that were held across the country during the consultation period. The statements reflect stakeholders’ comments about the review during these meetings. Individuals, organisations and numbers of people that made comments are not included.

### Theme One: Volunteers

#### Support for volunteers

Combining training and exercises with both paid and volunteer firefighters was recommended so that everyone gets to know each other. Training people at their marae or school was also raised as a way to support volunteers, as was staffing stations with paid staff during the day, to help at times when volunteers were unavailable.

The types of incentives that could be offered to both volunteers and their employers included: childcare provision, retainers where volunteers are paid per call, reduced levy for employers, insurance and tax breaks. On the other hand, some people did not want money to be involved as this was contrary to the volunteer ethos, or could be difficult for some because of secondary tax.

Others discussed the importance of recognising the contribution of volunteers, their employers and their families through the UFBA awards, Queen’s Service Medal and a genuine thank you. Some identified local government as playing a key role in helping to acknowledge this.

There were comments on how to get the younger generation involved as volunteers in the fire services. Rural de-population and seasonal workers were also recognised as issues impacting on the sustainability of rural volunteers.

People thought that there should be better support for volunteers and to consider how to match what they can do with the community expectation. It was important for volunteers to be involved in these discussions, and to be involved in the decision making.

#### Risk of the options for volunteers

There were some concerns that volunteers would leave if they had to come up to a higher standard and attend motor vehicle accident courses. There was also a concern that volunteers could lose their autonomy under Option 3.

### Theme Two: Effective service delivery

#### Greater clarity

People recognised that protection and powers were required for firefighters at non-fire events, as well as improved clarity around responding to non-fire events. There was also a sense to not restrict what volunteers can currently do just because they do or do not have a piece of paper. Volunteers also emphasised not making people undertake training for activities that they did not want to be involved with, as this could discourage volunteers from joining. There was also a concern about the standards that they might need to meet. One person also commented on the risk of stepping on emergency services’ toes with mandate. Another said that forestry would not want to attend any non-fire events, even if they were paid.

There were comments that Option 3 provided a good opportunity to standardise systems, although there was a question about how rural fire services would be delivered under this Option.

#### Coordinated, consistent and flexible

The majority of comments regarding emergency services asked whether this review would look at merging the wider emergency services organisations. Other comments related to medical call outs, asking why St John get paid for their call outs when the fire services did not. One person also asked about partnering between the Police and NZFS for intelligence.

#### Resources and training

People asked which option would ensure that firefighters are getting the right training for their tasks and that any change would need to ensure the right resources, equipment, safety and training were available.

There was an emphasis on setting a standard for training between rural and urban and questions about how much training urban brigades and rural fire forces received. One recommendation was to formalise urban and rural training so that they are provided together. Others commented on not wanting extra burdens with training and more paper work, as these have been increasing.

#### Recognise the difference between rural and urban fire service delivery

People wanted to recognise that rural fire is also about land management, not just suppression, and that this would need to be recognised in a new system. Others wanted to ensure that rural gets the recognition that it deserves and that its flexibility should remain, as should the people who have that rural fire knowledge and expertise. Concerns were also raised about how long duration fires would be resourced under Option 3, and whether the Department of Conservation and rural fire contractors would still be involved.

#### Stakeholders’ involvement in rural fire

There was also an eagerness to ensure that current stakeholders continue to be involved in the new system and to clarify their roles.

#### Powers

People asked how local permitting would operate under Option 3. Some stated that they did not want cost recovery, while others questioned whether you needed to keep it, while others were concerned if this was lost. There were also questions about the size of the new boundaries and how they would operate.

Other also raised the issue of compliance and enforcement, with one person saying that it would be good to have the ability to fine perpetrators.

#### Research

Questions were asked about what international research had been undertaken, with one person saying that the United States of America is a better model to look at because they have so many volunteers. People also mentioned fire services’ changes in Queensland and Tasmania, with one saying that Tasmania’s changes worked well because it is not too complicated.

### Theme Three: Community Involvement

#### Community involvement and the options

There was recognition that community involvement is a key element in whatever model is chosen, with one person saying that Option 3 enables smaller communities to better identify their need and the resources they need to deliver it. Others highlighted the importance of communities having autonomy and the ability to innovate.

In many locations, people mentioned that they had a good model operating there. These comments focused on their strong community spirit and connection and a high level of trust. A person in Northland commented on the community governance group that they have established.

One person said that fire brigades are the community, drawn from the community, recognising the importance of their local knowledge.

#### How to maintain community involvement

People recognised that a regional structure could enable community involvement, especially if it had a fair and equal receipt of central funding. They recommended not making it complicated, and not making it like a super city.

### Theme Four: Transition

#### Appetite for change

There was some concern that moving to an Option 3 could involve losing key people with knowledge and expertise. One person stated that it was “appealing to pull the empires together, but there is a definite trepidation.” Others thought an integrated model would be good because urban and rural were currently competing for volunteers, and it was good to standardise.

#### Culture change

With the culture change that would occur with the change, people emphasised keeping a rural culture, as it was not just about fighting rural fires but the community development. There were also comments to minimise the division between paid and volunteer firefighters and a recognition that culture change can take time and energy, with it taking 20 years to change in Tasmania.

#### What could help with transition

To improve the transition, people recommended continuing with the open consultation and asked if there would be a second round of consultation on the final option. People also asked that the Department think outside the square, and suggested meeting with groups like those at the regional meetings, or doing more engagement surveys.

Others asked about the timetable for implementation and emphasised that everyone needs to see the transition plan. People also emphasised building on the good work that was already occurring, and to develop people to take it forward. Maintaining flexibility was also emphasised to go with a hybrid approach, rather than centralised. Making transfers easier and improving the recognition of training would also help with the upcoming transition.

### Theme Five: Funding purpose and principles

#### Addressing funding issues

There was concern about people paying their fair share, particularly because the current fire service levy does not capture those who do not insure. People mentioned that the funding system needs improvement, with some funding being covered by local fundraising to get equipment they need.

#### Adequate funding of rural fire

Rural fire being under-funded and under resourced was often raised, with considerations to be made about how to secure funding from current rural stakeholders. One person said that charging for fires in rural areas is currently stopping people from calling 111. There was also a concern that rural should not lose the rural fire fighting fund.

#### Funding non-fire

Most comments regarding funding non-fire activities related to concerns that the fire service levy was funding medical emergencies and motor vehicle accidents.

#### Local funding

People emphasised that it was important to think about the local funding stream. Some said that local government should stay involved because it is a formal way for the fire services to connect with local communities, while others said that local government do not need to be involved, especially if Option 3 were selected. Other suggestions included that local government could be involved with input, governance, direction, voice, and funding and that they should have control when they contribute funding.

#### Rural fire funding

One submitter said that they would like the current sections 45 and 46 of the Forest and Rural Fires Act changed, and another that it was important to keep private companies involved in rural fire.

### Funding options

The funding options were not discussed as much as the governance and support options. Some questions that were raised included:

* questions about why ACC and rates were not included;
* suggestions to put cost on fuel tax or require compulsory car insurance to pay for motor vehicle incidents;
* questions about how the levy would be collected and who it would be paid to;
* concerns that forest owners are hit with multiple costs with the fire levy for insurance on their house, a targeted rate from the local authority and the cost to have their own fire brigade in some instances; and
* a comment that some forestry owners think that their forest is covered by the fire service levy that they pay for their house.

# Appendix Four: List of stakeholders

The Minister and the review project team have been in contact with a number of key stakeholders regarding the discussion document, including:

* Ambulance New Zealand
* Aviation Industry Association
* Business New Zealand
* Electricity Networks Association
* Enlarged Rural Fire District Group
* Executive Fire Officers Society
* Federated Farmers
* Forest and Rural Fires Association of New Zealand
* Forest Industry Contractors Association
* Insurance Brokers Association of New Zealand
* Insurance Council of New Zealand
* LandSAR
* Local Government New Zealand
* Metropolitan Museum Directors' Group
* New Zealand Beef and Lamb
* New Zealand Farm Forestry Association
* New Zealand Forest Owners' Association
* New Zealand Search and Rescue Council
* Professional Firefighters Union
* Public Service Association
* Scion Fire Researchers
* Society of Local Government Managers
* St John Ambulance
* United Fire Brigades’ Association
* Wellington Airport Fire Services
* Wellington Free Ambulance

# Appendix Five: The discussion document questions form

Questions form

We would like to know what you think about the proposals in the [Fire Services Review: discussion document](http://www.dia.govt.nz/fireservicesreview).

This form lists all of the questions from the discussion document to help with your submission.

You do not have to answer all the questions when making your submission. Just answer those questions that you want.

Once you have filled in this form you can:

* click “submit” at the bottom of the page and your submission will be sent to us; or
* save this document and email it to [fireservicesreview@dia.govt.nz](mailto:fireservicesreview@dia.govt.nz); or
* print this form and post it to:

Fire Services Review

Department of Internal Affairs

PO Box 805

Wellington 6140

All feedback received by the closing date of 10 July 2015 will be taken into consideration before the Government makes decisions about the required legislation and policy changes later in the year.

You can view the discussion document and information about the consultation process at: [www.dia.govt.nz/fireservicesreview](http://www.dia.govt.nz/fireservicesreview)

What will happen to your submission

The Department may publish the submissions it receives and provide a summary of them on its website [www.dia.govt.nz](http://www.dia.govt.nz). This may include your name or the name of your group but not your contact details.

Submissions may be subject to a request to the Department under the Official Information Act 1982. Personal details can be withheld under this Act, including names and addresses. If you or your group do not want any information contained in the submission to be released, you need to make this clear in the submission and explain why. For example, you might want some information to remain confidential because it is commercially sensitive or personal. The Department will take your request into account.

When the review is completed, all documents (including submissions) will be kept by the Department. An electronic archive of this material may be available on the Department’s main website ([www.dia.govt.nz](http://www.dia.govt.nz)) for a period after the end of the review.

Contact details

|  |  |
| --- | --- |
| Full name: |  |
| Organisation (if submission is made on behalf of an organisation): |  |
| Postal address: |  |
| Email: |  |
| Phone: |  |

Questions from the discussion document

**“What should our fire services look like?”**

|  |
| --- |
| 1. Are there particular areas of the fire services that are working well that you would like to tell the review about? |
| 1. Do you agree that these are the problems and consequences that the review needs to address? |

**“Options to support our firefighters to serve our communities better”**

|  |
| --- |
| 1. What do you see as the advantages and disadvantages of Option 1: Enhanced status quo from your perspective? |
| 1. What do you see as the advantages and disadvantages of Option 2: Coordinated service delivery from your perspective? |
| 1. What do you see as the advantages and disadvantages of Option 3: One national service from your perspective? |
| 1. Which governance and support option do you prefer? (please choose one only): 2. Option 1: Enhanced status quo 3. Option 2: Coordinated service delivery 4. Option 3: One national service 5. Other (for example a mix of the options)   6.1 Why did you choose that option? |
| 1. Do you have ideas for what new organisations in Options 2 and 3 could be called? |
| 1. How do you think the governance and support options could be implemented? Please feel free to comment on any of the options from the discussion document. |

**“What might help with the Commission’s fire service levy”**

|  |
| --- |
| 1. What do you see as the advantages and disadvantages of Funding Option 1: Insurance-based model (enhanced status quo) from your perspective? |
| 1. What do you see as the advantages and disadvantages of Funding Option 2: Mixed funding model from your perspective? |
| 1. Which funding option do you prefer? (please choose one only): 2. Funding Option 1: Insurance-based model (enhanced status quo) 3. Funding Option 2: Mixed funding model   11.1 Why did you choose that option? |
| 1. How do you think the funding options could be implemented? Please feel free to comment on any of the funding options. |

**General questions**

|  |
| --- |
| 1. Are there any other comments that you would like to make about the issues and proposals? |
| 1. Please let us know if you identify with any of the groups below (select all that apply): 2. rural fire services; 3. urban fire services; 4. volunteer firefighter; 5. paid/career firefighter; 6. emergency services; 7. community group; 8. local authority; 9. general public; 10. landowner; 11. insurance organisation; 12. other (please specify). |

1. The list of submitters, their organisations and what options they selected is provided in Appendix Two. [↑](#footnote-ref-1)
2. Percentages relate to those submitters who chose a governance and support option. The submitters who made no selection of a governance and support option have been excluded from this discussion. [↑](#footnote-ref-2)
3. ‘Free riding’ refers to people who do not insure, or who underinsure, so do not pay a fire service levy, or pay a reduced levy, when they may benefit from fire services. [↑](#footnote-ref-3)
4. These organisations are often referred to as the “rural fire stakeholders” throughout the report. [↑](#footnote-ref-4)
5. Note: this graph shows the number of comments, not the number of submitters. Some submitters will have commented multiple times on volunteer themes. [↑](#footnote-ref-5)
6. A retainer could involve the fire fighter receiving a regular set fee, regardless of whether they are required to attend a fire or not. [↑](#footnote-ref-6)
7. Risk reduction, readiness, response and recovery. [↑](#footnote-ref-7)
8. The term ‘Commission’ is used for simplicity, as in the Discussion Document. [↑](#footnote-ref-8)
9. Note: this graph shows the number of comments, not the number of submitters. Some submitters will have commented multiple times on volunteer themes. [↑](#footnote-ref-9)
10. *New Zealand Fire Service Commission v Insurance Brokers Association of New Zealand Incorporated* [2015] NZSC 59. [↑](#footnote-ref-10)
11. Dunn, M., Destremau, K. (2014). *Funding the Fire Service Levy on commercial real property.* Wellington: New Zealand Institute of Economic Research. [↑](#footnote-ref-11)
12. *New Zealand Fire Service Commission v Insurance Brokers Association of New Zealand Incorporated* [2015] NZSC 59. [↑](#footnote-ref-12)
13. 28 firefighters. [↑](#footnote-ref-13)
14. New Zealand agency for Rescue 3 International, the world’s largest provider of water and rope rescue training. [↑](#footnote-ref-14)
15. 26 firefighters. [↑](#footnote-ref-15)
16. 13,000 members. [↑](#footnote-ref-16)
17. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-17)
18. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-18)
19. New Zealand’s largest provider of water containment solutions. [↑](#footnote-ref-19)
20. Operator of a Registered Industrial Fire Brigade. [↑](#footnote-ref-20)
21. 23 firefighters. [↑](#footnote-ref-21)
22. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-22)
23. 17 firefighters. [↑](#footnote-ref-23)
24. 18 firefighters. [↑](#footnote-ref-24)
25. Nine Voluntary Rural Fire Forces with 130 firefighters. [↑](#footnote-ref-25)
26. 18 organisations. [↑](#footnote-ref-26)
27. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-27)
28. Also supports in part the submission 225 from Local Government New Zealand. [↑](#footnote-ref-28)
29. Body which comprises essentially all the Christian Churches in New Zealand. [↑](#footnote-ref-29)
30. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-30)
31. Contracts fire management services to Waimea Rural Fire Authority. [↑](#footnote-ref-31)
32. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-32)
33. About 200 household members. [↑](#footnote-ref-33)
34. 25 firefighters. [↑](#footnote-ref-34)
35. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-35)
36. 13 firefighters including three Rural Fire Officers. [↑](#footnote-ref-36)
37. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-37)
38. Also supports submission 206 from Insurance Council of New Zealand. [↑](#footnote-ref-38)
39. $12.4m of the $350m levy in 2013/14 was collected from the submitter's customers. [↑](#footnote-ref-39)
40. Represents almost all of the Area Commanders and Assistant Area Commanders in NZFS. [↑](#footnote-ref-40)
41. Largest forest owner in Otago and a member of the Otago Rural Fire Authority. [↑](#footnote-ref-41)
42. 42 firefighters. [↑](#footnote-ref-42)
43. Rural fire district is about 445,000 hectares. [↑](#footnote-ref-43)
44. 15 firefighters. [↑](#footnote-ref-44)
45. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-45)
46. 23 firefighters. [↑](#footnote-ref-46)
47. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-47)
48. 19 firefighters. [↑](#footnote-ref-48)
49. 18 firefighters. [↑](#footnote-ref-49)
50. Part of UFBA, represents about 138 member brigades. [↑](#footnote-ref-50)
51. 23 firefighters. [↑](#footnote-ref-51)
52. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-52)
53. 36 firefighters. [↑](#footnote-ref-53)
54. 26 firefighters, 2 registered nurses, 3 support staff and others. [↑](#footnote-ref-54)
55. Represents 680 companies. [↑](#footnote-ref-55)
56. Represents Trust owners of electricity distribution businesses. [↑](#footnote-ref-56)
57. 12 ERFDs. [↑](#footnote-ref-57)
58. Trains more than 200 firefighters to respond to fires in their forests. [↑](#footnote-ref-58)
59. Rural fire district is about 1 million hectares. [↑](#footnote-ref-59)
60. 11 firefighters. [↑](#footnote-ref-60)
61. Also supports submission 206 from Insurance Council of New Zealand and 229 from Business New Zealand. [↑](#footnote-ref-61)
62. Collects about $60 million annually in levy. [↑](#footnote-ref-62)
63. 30 firefighters. [↑](#footnote-ref-63)
64. Rural fire district is about 4.2 million hectares. [↑](#footnote-ref-64)
65. Rural fire district covers about 12.5% of NZ's land area. [↑](#footnote-ref-65)
66. 60 member organisations. [↑](#footnote-ref-66)
67. 60 members. [↑](#footnote-ref-67)
68. 11 firefighters. [↑](#footnote-ref-68)
69. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-69)
70. Also supports submission 171 from Otago Rural Fire Authority. [↑](#footnote-ref-70)
71. Also supports submission 115 from South Canterbury Rural Fire Authority. [↑](#footnote-ref-71)
72. Also supports submission 225 from Local Government New Zealand. [↑](#footnote-ref-72)
73. 20 firefighters. [↑](#footnote-ref-73)
74. 130 staff. [↑](#footnote-ref-74)
75. 200 members with 1.2 million hectares of forest. [↑](#footnote-ref-75)
76. Represents 29 electricity network businesses. [↑](#footnote-ref-76)
77. Represents over 150 insurance broking companies. [↑](#footnote-ref-77)
78. Represents 28 insurance companies. [↑](#footnote-ref-78)
79. Manages regional facilities and landmarks in Auckland. [↑](#footnote-ref-79)
80. Also supports submission 206 from Insurance Council of New Zealand. [↑](#footnote-ref-80)
81. Manages about 130,000 hectares of forest. [↑](#footnote-ref-81)
82. Also supports submission 203 from Electricity Networks Association. [↑](#footnote-ref-82)
83. 360 members. [↑](#footnote-ref-83)
84. Also supports submission 150 from Enlarged Rural Fire Districts Chairs’ Group. [↑](#footnote-ref-84)
85. Also supports submission 225 from Local Government New Zealand and 114 Ōpōtiki District Council. [↑](#footnote-ref-85)
86. Also supports submission 115 from South Canterbury Rural Fire Authority. [↑](#footnote-ref-86)
87. 18 firefighters. [↑](#footnote-ref-87)
88. 24 firefighters. [↑](#footnote-ref-88)
89. Also supports submission 142 from Otago Volunteer Rural Fire Forces. [↑](#footnote-ref-89)
90. Represents farming and other rural businesses. [↑](#footnote-ref-90)
91. Represents over 76,000 employers and businesses. [↑](#footnote-ref-91)
92. Represents small-scale forestry operations. [↑](#footnote-ref-92)
93. Represents 525 brigades, 385 of those brigades are drawn from the 12,000 NZFS brigade and rural volunteers. UFBA sent a survey to its members regarding the discussion document and received 650 responses. A summary of these responses is provided in its submission. [↑](#footnote-ref-93)
94. Represents virtually all Career Operational Firefighters and the vast majority of Black Watch workers (Communication Centres, Fire Safety Officers and Volunteer Support Officers). [↑](#footnote-ref-94)
95. Also supports submission 229 from Business New Zealand. [↑](#footnote-ref-95)