

Submission on the Commerce Commission's Draft Resilience Principles: Decision-Making Framework for Critical Infrastructure Providers

18 August 2026

IPWEA New Zealand welcomes the opportunity to comment on the Commerce Commission's Draft Resilience Principles: Decision-Making Framework for Critical Infrastructure Providers.

From an infrastructure stewardship perspective, we support the development of a nationally consistent resilience framework that strengthens long-term service delivery outcomes for communities while reinforcing sound asset management practice. Our comments are framed through the principles and practices of the [International Infrastructure Management Manual \(IIMM\)](#), ISO 55001 asset management systems, and the [Climate Resilient Infrastructure Guideline \(CRIG\)](#), which collectively provide a well-established foundation for resilience planning, lifecycle management, climate adaptation, and infrastructure decision-making.

Our objective is to ensure the framework integrates seamlessly into the day-to-day planning, investment and operational activities of water service providers, enabling organisations to progressively improve asset management maturity while strengthening resilience outcomes across the sector.

The draft guidance provides a strong foundation. We support the distinction between risk tolerance and risk-bearing capacity, and the recognition that governance, regulatory arrangements and service delivery dependencies form genuine infrastructure interdependencies that influence resilience outcomes.

Summary of Recommendations

1. Integrate resilience within established asset management systems

Resilience should be positioned as an outcome of effective infrastructure stewardship rather than as a separate management discipline. Consistent with IIMM, resilience emerges from good governance, levels of service planning, lifecycle management, risk management, asset information, and investment decision-making.

We recommend aligning framework terminology with:

- ISO 55001
- The Global Forum on Maintenance and Asset Management (GFMAM) Landscape
- IIMM concepts and terminology
- Relevant CRIG Practice Notes addressing climate adaptation and resilience planning

This would assist service providers in embedding resilience within existing asset management systems rather than developing parallel frameworks.

2. Strengthen lifecycle decision-making inputs

Resilience investment decisions should consider more than hazard exposure alone. The IIMM emphasises that sustainable service delivery requires understanding:

- Asset condition and performance
- Remaining useful life
- Capacity and utilisation
- Levels of service
- Current and future demand
- Asset criticality
- Design standards and construction quality
- Climate change impacts

The CRIG similarly highlights the importance of understanding exposure, vulnerability, adaptive capacity and future climate scenarios when evaluating infrastructure risks.

Accordingly, asset health, design standards, service demand and climate-related risks should be treated as core inputs to resilience investment decisions.

3. Establish a maturity-based implementation pathway

IPWEA supports a scaled approach that recognises differing organisational capability levels.

Many organisations are at different stages of their asset management maturity journey. The framework should therefore support progressive improvement rather than requiring advanced analysis from the outset.

We recommend establishing:

- **Foundational maturity**
- **Mature maturity**

These pathways should align with recognised asset management maturity frameworks used throughout the infrastructure sector and reflected within IIMM practice.

This approach would allow providers to demonstrate tangible progress using existing information and resources while creating a clear pathway toward more sophisticated resilience planning.

4. Link risk assessment directly to prioritisation and system resilience

A key principle of infrastructure stewardship is ensuring that risk information directly informs investment decision-making.

The risk assessment process should not end once individual projects are evaluated. Instead, as promoted within IIMM and supported by CRIG adaptation planning processes, risk assessments should become the foundation for:

- Portfolio prioritisation
- Renewal planning
- Growth investment
- Climate adaptation investment
- Operational risk management

This ensures that all investment decisions contribute to improving overall system resilience.

5. Reduce duplication across regulatory frameworks

The greatest opportunity for the sector is not additional guidance documents, but clarity regarding how resilience requirements integrate into existing planning and reporting obligations.

Resilience evidence should be embedded within documentation that providers already maintain, including:

- Strategic Asset Management Plans (SAMPs)
- Asset Management Plans (AMPs)
- Infrastructure Strategies
- Risk Management Frameworks
- Information Disclosure documentation
- Climate adaptation planning documentation

This would reduce compliance costs, improve consistency and reinforce resilience as a core element of infrastructure stewardship.

Recommendations for Strengthening the Framework

1. Frame resilience within the asset management system

The draft guidance occasionally presents service delivery and asset management as distinct concepts. From an IIMM perspective, they are inseparable.

Infrastructure assets exist to deliver services, and asset management exists to ensure those services are provided sustainably, reliably and cost-effectively over the asset lifecycle.

A resilience framework therefore works best when embedded within the broader asset management system.

Recommendation 1a

Revise Paragraph 1.18 to state:

Effective resilience investment prioritisation depends on a clear consumer and service delivery focus, rather than on physical asset solutions alone.

Recommendation 1b

Replace resilience-specific terminology that sits outside established asset management practice with concepts aligned to:

- ISO 55001
- GFMAM Asset Management Landscape
- IIMM
- CRIG climate adaptation frameworks

This positioning would reinforce resilience as a cross-cutting organisational capability rather than a stand-alone function.

Recommendation 1c

Include a common glossary defining:

- Resilience
- Reliability
- Criticality
- Vulnerability
- Interdependency
- Risk tolerance
- Risk-bearing capacity
- Asset management maturity

Recommendation 1d

Recognise the complementary role of:

- ISO 31000 Risk Management
- ISO 9001 Quality Management
- Climate adaptation frameworks such as CRIG

These frameworks collectively support mature infrastructure stewardship.

2. Investment decisions should reflect whole-of-life value

The draft framework has a strong hazard focus. However, hazards alone do not determine resilience priorities.

IIMM promotes balanced decision-making that considers:

- Asset condition
- Performance
- Remaining life
- Demand projections
- Lifecycle costs
- Service consequences
- Risk exposure

Similarly, CRIG notes that climate resilience is strengthened through a combination of physical, operational and adaptive interventions.

Many resilience outcomes can be achieved through:

- Enhanced operational readiness
- Emergency response capability
- Supply chain resilience
- Contingency planning
- Temporary service arrangements
- Monitoring and early warning systems

These options should be assessed alongside capital investment solutions.

Recommendation 2a

Require that criticality assessments and options analysis incorporate:

- Service demand
- Remaining asset life
- Asset condition
- Asset performance
- Design standards
- Climate change exposure

Combining Principles 8 and 9 could provide a more integrated lifecycle investment framework.

3. Scale expectations according to organisational maturity

The current expectations largely describe advanced maturity practice.

For many providers, particularly smaller organisations or those undergoing reform, this creates a significant implementation challenge.

IIMM recognises that asset management capability develops progressively. Organisations should be encouraged to improve over time rather than judged against a single mature-state benchmark.

Recommendation 3a

Provide two tiers of evidence:

Foundational

- Existing asset and risk information
- Current condition assessments
- Existing asset management plans
- Operational experience and local knowledge

Mature

- Predictive modelling
- Multi-hazard analysis
- Advanced climate scenario planning
- Quantified resilience assessments
- Dynamic adaptation pathways

Recommendation 3b

Ensure foundational requirements can be achieved using information already available to providers.

Recommendation 3c

Align implementation pathways with recognised asset management maturity frameworks and organisational context.

The appropriate maturity target should reflect risk exposure, service criticality and organisational complexity rather than applying a universal standard.

4. Link risk, criticality and resilience outcomes

One of the strongest opportunities within the framework is creating a direct connection between:

- Risk assessment
- Asset criticality
- Investment prioritisation
- Resilience outcomes

From an infrastructure stewardship perspective:

- **Risk** measures likelihood and consequence.
- **Criticality** reflects the importance of an asset to service delivery.
- **Resilience** represents the ability of the system to anticipate, withstand, recover from and adapt to disruption.

Making these relationships explicit would improve transparency and investment confidence.

Recommendation 4a

Use the risk assessment developed through Principles 1 and 2 as the primary basis for portfolio prioritisation.

Recommendation 4b

Assess investments based on their contribution to whole-of-system resilience, not solely project-level performance.

Recommendation 4c

Apply asset-level and component-level criticality assessments to distinguish among assets exposed to similar risks.

This approach aligns closely with both IIMM risk-based decision-making and CRIG adaptation planning principles.

5. Align resilience requirements with existing planning processes

The sector would benefit most from greater clarity regarding how resilience evidence should be incorporated into existing documentation.

Recommendation 5a

Map resilience evidence requirements directly to:

- Strategic Asset Management Plans
- Asset Management Plans
- Infrastructure Strategies
- Risk Management Frameworks
- Climate Adaptation Plans
- Regulatory disclosures

Recommendation 5b

Reference established capability and maturity frameworks used throughout the infrastructure sector, including IIMM maturity pathways and CRIG resilience planning guidance.

6. Align incentives with resilience outcomes

Infrastructure stewardship requires selecting the solution that delivers the greatest long-term service outcome, regardless of whether it is capital-intensive.

Current regulatory settings can unintentionally favour physical asset solutions over operational, adaptive or nature-based alternatives.

Examples include:

- Relocating infrastructure instead of defending it
- Enhanced monitoring and adaptive management
- Demand management initiatives
- Cybersecurity improvements
- Emergency preparedness capability
- Nature-based adaptation solutions

The CRIG emphasises that climate resilience is often achieved through combinations of engineered, operational and adaptive responses rather than asset hardening alone.

Recommendation 6a

Ensure regulatory and funding settings provide neutral treatment between:

- Capital solutions
- Operational solutions
- Adaptive management responses
- Non-asset interventions

So that the most effective resilience outcome is selected based on whole-of-life value.

Closing Comments

IPWEA New Zealand supports the Commerce Commission's direction and considers the draft framework a significant step toward strengthening resilience across New Zealand's infrastructure sectors.

The framework will achieve the greatest sector uptake and long-term value if resilience is embedded within established asset management systems, aligned with IIMM principles, informed by CRIG climate resilience guidance, and scaled according to organisational maturity.

A resilience framework grounded in infrastructure stewardship will support better investment decisions, improved service outcomes, more effective climate adaptation and stronger long-term outcomes for communities across Aotearoa New Zealand.