

Our Reference: EXT-39 /260810235168

14 August 2026

Commerce Commission

Via email: Infrastructure.Regulation@comcom.govt.nz

Waimakariri District Council feedback on the draft guidance document - Resilience Principles: Decision-Making framework for critical infrastructure providers.

1. Introduction

- 1.1. The Waimakariri District Council (the Council) thanks the Commerce Commission (the Commission) for the opportunity to provide feedback on the Draft Resilience Principles guidance document.
- 1.2. We note the Commission's original closing date for this feedback was 31 July 2026 and was extended to 14 August 2026.
- 1.3. The Council supports the development of the guidance document, which upon reviewing provides a valuable framework for informed, evidence-based decision-making regarding resilience investments. It outlines the critical considerations and processes that service providers should follow to assess risks, evaluate options, and make investment decisions that support the investment of critical services.
- 1.4. Feedback is provided below to assist you with ensuring the draft guidance document is further enhanced in a way that will be of assistance to critical infrastructure providers.

2. Background

- 2.1. Waimakariri District is located in the Canterbury Region, north of the Waimakariri River. The District is approximately 225,000 hectares in area and extends from Pegasus Bay in the east to the Puketeraki Ranges in the west. It lies within the takiwā of Ngāi Tūāhuriri one of the primary hapū of Te Rūnanga o Ngāi Tahu. The District shares boundaries with Christchurch City to the south, Selwyn District to the south and west, and Hurunui District to the north.
- 2.2. The Waimakariri District is geographically diverse, ranging from provincial townships such as Rangiora and Kaiapoi, through to the remote high country farming area of Lees Valley. Eighty percent (80%) of the population is located in the east of the district and approximately sixty percent (60%) of residents live in the four main urban areas of Rangiora, Kaiapoi, Woodend/Pegasus and Oxford. The remainder live in smaller settlements or the district's rural area, including approximately 6000 on rural-residential or rural 'lifestyle' blocks.
- 2.3. Geographically, socio-culturally and economically, the Waimakariri District is primarily a peri-urban area. Residents are drawn to and identify with the outdoor lifestyle and recreation opportunities available in our district. However, due to its proximity to

Christchurch City, the district has a significant and growing urban and peri-urban population. Consequently, primary production and construction are the two largest economic sectors in the district.

3. Key Feedback Points

Scalability

- 3.1. While it would be desirable for all critical service providers to apply the full range of assessment and planning activities described in the guidance, this may not always be practical. In reality, key elements such as criticality assessment, interdependency, and prioritisation are often omitted due to funding, resource, or capability constraints.
- 3.2. Consideration should therefore be given to identifying a set of mandatory minimum requirements that all service providers must undertake, alongside additional recommended activities that can be applied where size or scale requires.
- 3.3. An alternative approach could be the development of two implementation pathways:
 - 3.3.1. A simplified approach for smaller projects or programmes, focusing on essential assessment and decision-making steps using available data and resources.
 - 3.3.2. An advanced approach for larger or more complex projects or programmes, incorporating more comprehensive analysis and detailed evidence gathering to achieve enhanced resilience outcomes.
- 3.4. For example, in Table 3.1, the indicators could be grouped into those applicable to the simplified approach and those applicable to the advanced approach.

Redundancy

- 3.5. The resilience principles outlined in the document are primarily focused on decision-making processes and provide limited guidance on how resilience measures that should be funded in practice. In particular, there is insufficient direction regarding the appropriate levels of redundancy required for critical assets and services, the areas where redundancy should be prioritised, and the role and investment mechanism of alternative service delivery arrangements and backup systems.
- 3.6. We acknowledge that these matters are addressed in the Physical System Attributes section of the ResOrg report. However, redundancy should not be considered solely as a technical attribute in isolation from the associated investment requirements. The resilience principles should also provide guidance on the level of investment in redundancy, preparedness, and other resilience measures, ensuring these requirements are appropriately recognised, prioritised, and funded through financial planning and investment decisions.

Resilience reporting

- 3.7. We recommend the introduction of a resilience baseline concept. This would establish a consistent measure of the current resilience level of critical services across all service providers.

3.8. Service providers could then report annually on:

3.8.1. Investments made to improve resilience

3.8.2. The resilience initiatives implemented

3.8.3. Improvements achieved relative to the established baseline

3.8.4. Future resilience enhancement priorities.

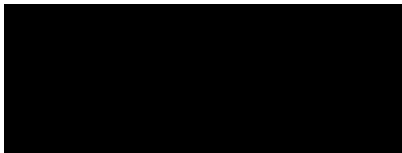
3.9. This approach would enable resilience performance to be measured consistently across sectors, provide visibility of progress over time, and support a clearer understanding of each service provider's resilience maturity and enhancement journey.

4. Summary of Position and Recommendations

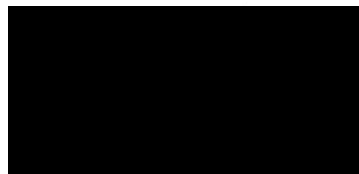
4.1. As noted above, we consider that additional guidance in the areas related to scalability and redundancy would help critical infrastructure service providers make more consistent and effective resilience investment decisions. And along with the addition of resilience reporting, this would ensure investment and initiatives for resilience of critical infrastructure is measured and progressed consistently.

Our contact for service and questions is Clare Piper, Policy and Corporate Planning Team Leader, [REDACTED].

Yours faithfully



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