



10 January 2026

**FROM:** Animal Evac New Zealand Trust

Chair, Governance & Administration Select Committee

New Zealand Parliament

Wellington

**SENT BY EMAIL TO:**

Dear Chair,

**SUBMISSION ON THE EMERGENCY MANAGEMENT BILL (No. 2)**

1. Animal Evac New Zealand is making this submission as part of the Select Committee hearing on the Emergency Management Bill (No. 2).
2. Animal Evac New Zealand (AENZ) is grateful for the opportunity to be involved in this important process. We trust our comments and observations below are of assistance in your consideration of the Bill.
3. AENZ asks that the Committee note the following documents, previously submitted to government (**Appendix A**):
  - Recommendations to enhance companion animal emergency management in New Zealand (Glassey, 2010).
  - Wellington SPCA Submission to the Ministerial Review on Emergency Management (Glassey, 2017).
  - No animal left behind: Report to Parliament (Glassey, 2019) presented by Gareth Hughes MP.
  - Animal Evac New Zealand National Disaster Resilience Strategy Submission (2019).
  - Animal Evac New Zealand submission to Select Committee on Emergency Management Bill No. 1 (November 2023)

- Animal Evac New Zealand submission to NEMA Discussion Document (May 2025).
4. AENZ asks that the Committee note the following documents that give further evidence to substantiate the recommendations in this submission (**Annex B**):
- Peer Reviewed Article in PETS: No Animal Left Behind: A thematic analysis of public submissions to the New Zealand Emergency Management Bill (2025).
  - Peer Reviewed Article in ANIMALS: 1000 animals left behind: Responder experiences of the 2017 Edgecumbe Flood in New Zealand (2024).
  - Peer Reviewed Article in International Journal of Disaster Risk Reduction: It was one of the worst days in my life: Companion animal owners' experiences of the Edgecumbe 2017 flood in Aotearoa New Zealand (2023).
  - Doctoral Thesis: A critical evaluation of the companion animal disaster management framework in New Zealand (Glassey, 2022).
  - Peer Reviewed Article in ANIMALS: Legal complexities of entry, rescue, seizure and disposal of disaster affected companion animals in New Zealand (2020).
  - Peer Reviewed Article in International Journal of Emergency Management: Lessons Lost: a comparative analysis of animal disaster response in New Zealand (2020).
  - Transcript of Craig Fugate, former Administrator of US Federal Emergency Management Agency (FEMA), keynote speaker at AENZ report presentation at Parliament (2019).
6. AENZ asks that the Committee note the following documents released under the Official Information Act that raise flags over conduct and processes by officials (**Annex C**). [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED] These materials warrant attention from media outlets, public stakeholders, and those charged with establishing and enforcing standards of conduct for public servants.
- Briefing to Minister of Civil Defence by Director Sarah Stuart-Black (7 February 2019).

- Recommends none of the recommendations be included in upcoming bill and reform.
- Directors Letter re report by Director Sarah-Stuart-Black (4 March 2019)
  - “Report worthy... important issues....matters raised will be considered in the scope of the review”.
- OIA release re National Disaster Resilience Strategy by MCDEM (12 September 2019)
  - Animal welfare a major theme. ‘MCDEM does consider animal welfare to be an area that merits further attention’.
- OIA released by MPI note to NEMA (5 September 2023)
  - MPI submission concludes “There needs to be clear reasons why the animal welfare issues we have raised have been rejected”.
- OIA released by NEMA requesting EM Bill project documents (25 June 2025)
- NEMA response to subsequent OIA, documents identified in Emergency Management Bill 2.0 Project Plan (version 0.1, dated 31/10/2024) (**Annex D**):
  - Risk of low-quality policy analysis identified in draft project plan
  - Project risk management including assurances around “real event” interruptions
  - Risk of consultation fatigue and need to give assurances that previous “feedback has been taken on board”.
- NEMA letter (26 September 2025) following Ombudsman investigation, noting:
  - Delays in supplying information due to “real events” despite above
  - No standalone report was prepared regarding earlier bill submissions<sup>1</sup>
  - No formal methodology employed in analysis

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<sup>1</sup> However, the Glassey (2025) open-access article provided New Zealand’s second only published peer-reviewed study of public submissions to a Bill, providing a significant analysis. This was not noted in any NEMA policy advice. The study’s findings were later validated by an independent analysis undertaken by the Parliamentary Library.

- Project plan was never finalised
- Peer review reports were never finalised

7. The structure of this submission is as follows:

- First, we detail the issues and recommendations found the above appendices that remain relevant since their publication (section 7.1). In summary, this includes:
  - Definitions are revised to include life, animal, companion animal, disability assistance dog, and essential animal care, and sentient (Clause 5).
  - Meaning of emergency to include events affecting animals, that are beyond the capabilities of emergency services or requires significant coordination (Clause 6).
  - Emergency functions and powers to protect life (Clauses 125-135), are animal-inclusive including sentient species.
  - Holding periods of animals rescued, seized or displaced.
  - Disposal provisions for animals rescued, seized or displaced.
  - Limiting the unilateral destruction of animals by controllers (Clause 133).
  - Ensuring the protection of disability assistance dogs during an emergency (Clause 210).
  - Providing controllers powers to temporarily prescribe, alter or suspend bylaws.
- Secondly, we raise our concerns with specific content and omissions within the Bill that should be considered by the Committee (section 7.2). In summary, this includes:
  - Removal of unrealistic contact owner requirements for animal rescue (Clause 102) with no international evidence to support such provisions.
  - Amendment of the purpose (Clause 3) to protect animals and property.
  - Removal of animal being treated as “property” (Clause 121), to remove legal requisite for ownership to give effect.

- Amendment of “emergency management” definition (Clause 5) to “... desirable for the safety of the public, animals, or property”, to give effect to other clauses like cl. 125.
- Adding regulations for giving future option to require emergency management plans to be established and approved for specified classes or groups of activities (for example: rest homes, universities, commercial animal housing facilities etc).
- Introducing accountability that organisations undertaking public functions under the Act come under the oversight of the Ombudsman where and for such functions are being undertaken during a state of emergency or transitional period.
- Introducing accountability that organisations receiving funding from the Crown for emergency management that are not already covered by the Official Information Act, are subject to the Official Information Act, restricted to the respective activities of that funding.
- Establishment of an Inspector-General of Emergency Management to provide independent oversight and assurance of the emergency management system, without the conflicting role that NEMA has as policy maker, regulator and operator.
- Finally, we identify further issues that warrant further analysis and discussion to enhance the future state of emergency management in New Zealand (section 7.3).
  - The use, liability and restrictions in using artificial intelligence in emergency management.
  - Mandating standards for lessons management, including standardised reporting, templates, storage and dissemination.
  - Mandating that emergency plans, strategies rules, orders, codes, and other documents prescribed under the bill, take into consideration scientific and technical evidence in their development.
  - NEMA’s use of legal professional privilege to heavily redact policy documents that uncovered further concerns should be of particular concern to the Select Committee and to citizens generally. Further discussion of these transparency

issues is provided in section 7.4. Following NEMA's transfer from DPMC to the Department of Internal Affairs (1 July 2025), responses to our concerns and related Official Information Act requests have become more transparent and substantive, illustrating that improved oversight and governance arrangements can help address such problems.

- We maintain that the official advice tendered to the government of the day has been potentially misleading, incomplete and has failed to represent the views of public submissions.
8. Drawing upon over 16 years of comprehensive research and strategic advocacy, New Zealand has the opportunity to pioneer animal-inclusive disaster management legislation of international significance. We submit this evidence-based framework to the Committee's consideration, with confidence that its adoption will establish a legislative precedent worthy of acclaim.

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## Annex A: Previously Submitted Materials

[Recommendations to enhance companion animal emergency management in New Zealand \(Glassey, 2010\).](#)

[Wellington SPCA Submission to the Ministerial Review on Emergency Management \(Glassey, 2017\).](#)

[No animal left behind: Report to Parliament \(Glassey, 2019\) presented by Gareth Hughes MP.](#)

[Animal Evac New Zealand National Disaster Resilience Strategy Submission \(2019\).](#)

[Animal Evac New Zealand submission to Select Committee on Emergency Management Bill No. 1 \(November 2023\)](#)

[Animal Evac New Zealand submission to NEMA Discussion Document \(May 2025\).](#)

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## Annex B: Further Evidence

[Peer Reviewed Article in PETS: No Animal Left Behind: A thematic analysis of public submissions to the New Zealand Emergency Management Bill \(2025\).](#)

[Peer Reviewed Article in ANIMALS: 1000 animals left behind: Responder experiences of the 2017 Edgecumbe Flood in New Zealand \(2024\).](#)

[Peer Reviewed Article in International Journal of Disaster Risk Reduction: It was one of the worst days in my life: Companion animal owners' experiences of the Edgecumbe 2017 flood in Aotearoa New Zealand \(2023\).](#)

[Doctoral Thesis: A critical evaluation of the companion animal disaster management framework in New Zealand \(Glassey, 2022\).](#)

[Peer Reviewed Article in ANIMALS: Legal complexities of entry, rescue, seizure and disposal of disaster affected companion animals in New Zealand \(2020\).](#)

[Peer Reviewed Article in International Journal of Emergency Management: Lessons Lost: a comparative analysis of animal disaster response in New Zealand \(2020\).](#)

[Transcript of Craig Fugate, former Administrator of US Federal Emergency Management Agency \(FEMA\), keynote speaker at AENZ report presentation at Parliament \(2019\).](#)

Additional documents available at <https://www.animalevac.nz/embill>



## Annex C: Selected OIA documents

[Briefing to Minister of Civil Defence by Director Sarah Stuart-Black \(7 February 2019\).](#)

[Directors Letter re report by Director Sarah-Stuart-Black \(4 March 2019\)](#)

[OIA release re National Disaster Resilience Strategy by MCDEM \(12 September 2019\)](#)

[OIA released by MPI note to NEMA \(5 September 2023\)](#)

[OIA released by NEMA requesting EM Bill project documents \(25 June 2025\)](#)

[NEMA response to subsequent OIA, documents identified in Emergency Management Bill 2.0 Project Plan \(version 0.1, dated 31/10/2024\), including NEMA letter \(26 September 2025\) following Ombudsman investigation.](#)

Additional documents available at <https://www.animalvac.nz/embill> and from [FYI.org submissions](https://fyi.org.nz/submissions) made.

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## Annex D: EM Bill Project Risk Matrix

Risk Description	Inherent Risk Rating	Mitigation / contingency
Risk of the EMSIP Phase 2 dependency noted above impacting on the project		Policy analysis is cognisant of the relevant EMSIP Phase 2 actions. Policy staff can lean into relevant actions to support timely identification of legislative implications, if required. Contingency plan is to make changes to the Bill through the Departmental Report (advice to Select Committee) or through Amendment Papers during the final stages of the legislative process.
Risk of low quality policy analysis and/or written advice due to time and resource constraints		Building in time for clear commissioning, check-ins on policy analysis, peer review of products. Policy Project peer review/QA templates used. Ensuring junior staff have access to training and support from experienced staff.
Risk of creating consultation fatigue for external stakeholders and iwi Māori partners		Maximising engagement opportunities where stakeholders are already meeting, ensuring we are coordinated with EMSIP Phase 2 and CRU engagement, explaining how previous feedback has been taken on board, so that stakeholders and partners feel heard.
Resources diverted to respond to an emergency response		Project Lead is not available for response work. If small/medium event, Policy likely to have light touch involvement and unit can continue working on Bill project in order to maintain momentum.

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