



TCF submission to DPMC on the consultation on the long term insights briefing on resilience

November 2024

Introduction

1. Thank you for the opportunity to take part in the [consultation](#) on the topic for a long term insights briefing on resilience.
2. The following comments are provided on behalf of the New Zealand Telecommunications Forum (TCF). The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers. Our members include network operators, retail service providers and the tower companies that own and operate cell towers.
3. The telecommunications sector provides critical infrastructure and services (such as internet access, messaging and voice calling) that New Zealanders, businesses and government rely on to be able to communicate, access essential services and do business. Telecommunications is also an enabler for other areas of critical infrastructure, such as electricity, fuel, banking and housing. Our infrastructure is essential for economic growth and wellbeing.
4. In this submission we offer thoughts on the proposed topic and the matters the briefing could cover.

The proposed topic

5. We think a long term insights briefing on resilience issues will provide a valuable opportunity to gather insights and information that has not been covered in government policy work on resilience to date. We suggest stock taking what has already been done by various agencies to avoid any unintended duplication.

6. We support the proposed topic “Everyone plays a part - building New Zealand’s resilience in the context of global trends and our unique natural environment”.

What the briefing should cover

7. We suggest the inclusion of three matters in the briefing. We think this subject matter will help fill gaps in understanding of the New Zealand resilience context, identify challenges and opportunities, and have potential to inform future policy initiatives.
8. The first suggestion is that the briefing take a slightly broader interpretation of global trends, and include how other countries are thinking about and dealing with the interconnectedness of critical infrastructure. This is a major gap in New Zealand’s policy work on resilience to date. More specifically it would be useful to understand how other countries have mapped out interdependencies, how they support critical infrastructure to understand and address them, and any other policies or initiatives they have put in place. The [OECD Toolkit on Governance of Critical Infrastructure Resilience](#) could provide some inspiration for framing up the areas of focus. It talks about the necessity of understanding complex interdependencies and vulnerabilities across infrastructure systems to be able to prioritise resilience efforts, and multi-sector coordination.
9. Our second suggestion is to look at the approaches taken in other countries to develop nationally consistent and publicly accessible sources of information, data and modelling about hazards and risks. At the moment councils, government departments and other organisations are either independently commissioning research and paying for data, using different data sets, or doing without it. The absence of such data has been identified by many stakeholders as a major barrier to resilience efforts. Understanding options for filling this gap would be very useful for policy makers looking to address the issue.
10. The third suggestion is to look at the coordination of natural hazard events. What national frameworks do other countries have in place to support community and regional responses? Is there best practice around the assessment of vulnerabilities and supporting community driven solutions? This might identify solutions that have already been proven to work at a regional or local level that could be adopted into a centralised New Zealand approach to support regional activity.
11. If you would like to discuss the suggestions in this submission please contact kim.connolly-stone@tcf.org.nz in the first instance.

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