



He uiuinga mō te whakatakoto i te utu
Ratonga Ahi me ngā Ohotata i Aotearoa
mō te tau 2026 – 2029

Consultation on setting the Fire and Emergency levy for 2026 – 2029



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Introduction

Fire and Emergency is New Zealand's trusted national fire authority and an emergency first responder for most communities.

We are made up of approximately 12,000 volunteers and 3,000 staff serving communities across New Zealand.

- We **must deliver** our main functions which include fire safety, prevention and response, responding to incidents involving hazardous substances, rescuing people trapped as a result of transport accidents or other incidents, and urban search and rescue.
- We **can assist** in other matters, if we have the capability and capacity to do so, but we must make sure that this isn't at the expense of delivering our main functions. Our assistance in other matters includes things like responding to medical emergencies, maritime incidents, other types of rescues, assistance at transport accidents, severe weather-related events, and natural hazard events and disasters.

Almost all of Fire and Emergency's funding comes from the fire levy paid on residential property, motor vehicle and non-residential property insurance.



Have your say

We want your feedback on the changes we're proposing to the Fire and Emergency levy for 2026–2029 and your views on the activities we propose to do during this period.

This consultation document describes how the levy system works, what we propose to do over the levy period, and the levy proposals for the different types of insurance categories.

How to make a submission

If you have a view on how the proposed options could affect you or the community, please let us know by making a submission.

We have provided some guiding questions to help you have your say. You can respond to as many – or as few – of the questions as you like. You don't need to answer all of our questions. Feel free to limit your responses to those topics of most relevance or interest to you.

Please indicate any part of your submission that you believe should be withheld under the Official Information Act, and the reason(s) for withholding it.

You can make a submission:

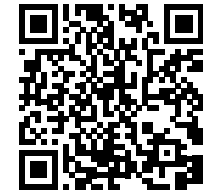


ONLINE

By completing the online questionnaire.

You can access this via the QR code opposite, or the link below:

www.fireandemergency.nz/about-us/levy-consultation-2026-2029



IN WRITING

By opening and saving your own copy of this document and answering any questions you wish to. You can then email or post your submission to us.

Email to levyfeedback@fireandemergency.nz or post to:
Levy Consultation, Fire and Emergency New Zealand,
PO Box 2133, Wellington 6140

The closing date for submissions is 5pm Friday 17 May 2024

How we will use your feedback

We will summarise the feedback we receive to assist the Minister of Internal Affairs (as the Minister responsible for Fire and Emergency) to make recommendations to the Government about the proposed levy rates for the period 1 July 2026 to 30 June 2029.

We will keep your submissions, and may publish or summarise them on our website, without personal information.

Official Information Act 1982

Submissions are subject to the [Official Information Act 1982 \(OIA\)](#). Please tell us if you have any objection to us releasing any information you have given us under the OIA. Please note, in particular, which part(s) of your information you don't want released, and why not.

Grounds for withholding information are set out in the OIA. Reasons could include that the information is commercially sensitive or that you wish personal information, such as names or contact details, to be withheld. Please note that an automatic confidentiality disclaimer from your IT system will not be considered as grounds for withholding information.

We will take your objections into account when responding to requests under the OIA, however, we may decide to release the information where there are grounds to do so.

Personal information

The [Privacy Act 2020](#) governs how organisations and businesses can collect, store, use and share your information. Any personal information you supply when making a submission will only be used for the purpose of helping to develop advice to Ministers in relation to the proposals in this document. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that we may publish. You have the right to access and correct your personal information.

1

Summary of proposals

We are seeking your feedback on the changes we're proposing to the Fire and Emergency levy between 1 July 2026 and 30 June 2029 and the activities we propose to undertake over that period.

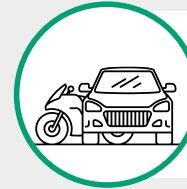
For that levy period, we are proposing that we need to collect **5.2%** more levy revenue to cover our costs, compared to the amount we will receive from 1 July 2024.

Further information on our calculations can be found in Appendix 1.

Changes to levy rates

Between 2026 and 2029, we propose to continue to deliver our services to you, as we are doing now, with some necessary improvements so that we can continue to operate safely and effectively.

To deliver these services, we are proposing the following changes to the levy rates:



An increased levy rate for motor vehicles to a universal flat levy rate of \$40.12 (excl. GST) to more fairly reflect the cost of attending motor vehicle related incidents



A reduced levy on residential and personal property to balance the increase in the motor vehicle levy



An increased cap on the residential and personal property levy to reflect shifting economic conditions and improve equity



A slightly lower levy on non-residential property due to the motor vehicle levy changes and wider economic conditions

We want you to tell us what you think about the activities we propose to undertake, and the rates of levy we are proposing.

2

About Fire and Emergency

We were set up to bring together all fire services across New Zealand

We are a Crown entity established in 2017 under the Fire and Emergency New Zealand Act 2017 (the Act). The Act brought together all fire services across New Zealand: the New Zealand Fire Service, the Fire Service Commission, the National Rural Fire Authority, 12 rural fire districts and 26 territorial authority rural fire authorities.

To reflect our increased role in responding to non-fire emergencies

We were established to reflect the changing role of firefighters beyond fighting fires, such as urban search and rescue, responding to motor vehicle crashes, medical emergencies, hazardous materials spillages, storms, floods, earthquakes and a wide range of rescues. With national fire and emergency capabilities, we can respond in a consistent way when large scale incidents, such as wildfires, happen.

Our firefighters and the people who support them are the backbone of our organisation

We are located in over 600 fire station sites across the motu, and we maintain a 24/7 response capability, so we're often the first on the scene when emergencies happen. Our purpose is to protect and preserve lives, property, and the environment.

We deliver a range of fire and emergency services for New Zealand



Our firefighters are highly skilled and take pride in serving their communities. To respond safely, we must continue to train our people and support them by providing safe and suitable facilities, training, equipment, and resources.

The diagram on the following page shows what we do. We must carry out our main functions ahead of everything else. Before we carry out any additional functions, we must make sure that we retain the capacity and capability to carry out our main functions efficiently and effectively.



Our main and additional functions, and our role as a fire regulator

Main functions

-  Promoting fire safety
-  Providing fire prevention, response and suppression services
-  Providing for the safety of persons and property endangered by incidents involving hazardous substances
-  Rescuing people trapped because of transport accidents or other incidents
-  Providing urban search and rescue services

Additional functions (assist with)

-  Medical emergencies, maritime incidents, weather events, natural hazard events, disasters, and non-hazardous substance incidents
-  Promoting safe handling, labelling, signage, storage, and transportation of hazardous substances
-  Rescues including line rescues, animal rescues, rescues from collapsed buildings, confined spaces, unrespirable and explosive atmospheres and swift water
-  Providing assistance at transport accidents

Our role as a regulator includes:

- a range of fire safety activities including setting fire seasons and issuing fire permits
 - a compliance and enforcement function
 - issuing infringement notices and prosecuting certain regulatory offences where necessary.
- We carry out risk reduction activities primarily focused on fire safety, including:
- being consulted on changes to relevant fire bylaws and certain matters of compliance with the Building Act 2004
 - being consulted, as needed, by other authorities when they consider exemptions under their legislation
 - being consulted, as needed, by local or regional authorities in the development of local district or regional council plans
 - approving certain events or changes, such as the location of fire hydrants
 - providing technical expertise on the firefighting capability required for outdoor pyrotechnic displays.



2. About Fire and Emergency

What we do and why

Each year, we set out in our annual Statement of Performance Expectations (SPE), annual standards of performance for our main and additional functions. These are based on our previous performance and agreed priorities for that year, and cover our role in the following functions:

Main functions – we must deliver these services

- Promote fire safety
- Provide fire prevention services
- Help set fire safety standards, and granting certificates or approvals
- Ensure compliance with standards through monitoring and enforcement
- Respond to fire – our 2023/24 SPE targets are:
 - within 8 minutes for career crews
 - within 11 minutes for volunteer crews
 - within 30 minutes for vegetation fires
- Respond to hazardous substances within 60 minutes
- Help promote the safe use of hazardous substances
- Respond to transport accidents within 30 minutes
- Provide Urban Search and Rescue (USAR) services.

Additional functions – we can assist with these services if we have capability and capacity

Help respond to:

- medical emergencies – our 2023/24 SPE targets are:
 - within 8 minutes for career crews
 - within 11 minutes for volunteer crews
- other (non-medical related) emergencies
- non-transport related rescue incidents.



2. About Fire and Emergency

We are aligned with the national integrated approach to emergency management, so we describe our activities in terms of **readiness, response and risk reduction.**

Readiness means making sure we're prepared for the next call. This includes making sure we have the people, tools and specialist equipment where they are needed, and the right skills and training to be able to respond safely.

Readiness also involves having a good understanding of how we have responded to previous emergencies, what we can improve, and how our environment is changing. If we understand all of these things, we can plan well for the next emergency.

Readiness is about being prepared and available to respond when you need us.

To ensure we are ready when you need us, we must:

- **Fix our fire stations**
We need to fix some of our fire stations so that they are suitable for our firefighters to occupy. Over 100 of our fire stations are in poor to very poor condition. Some are earthquake prone and need seismic upgrades to be resilient. This directly impacts our ability to provide local services to support communities during and after a significant event like a fire, flood, or earthquake.
- **Upgrade our fire engines**
Over a quarter of our fire engines are currently well past their target lifespan. We need to upgrade them so that they can respond when you need them. As we are the national response agency for fire, fire engines are our main type of response vehicle. If we can't replace our vehicles at the end of their useful lives or purchase new or more when we need them, we risk them breaking down during an emergency. This puts our people, and you and your communities, at greater risk of harm.
- **Maintain and upgrade our technology**
During an emergency, we need to communicate with each other, and across the emergency sector. This means we need the right infrastructure to support our people and our operations. To do this we need to ensure our technology and systems are maintained and upgraded where necessary.

- **Train and equip our people**
Our people need the right skills, equipment, and protective clothing to carry out their functions safely. As the risks we face change, our people need to be ready. The following case studies show how we invest in our emergency functions as well as our fire response. We need to make sure that our people can work safely when we are asked to respond to emergencies.
- **Maintain a sustainable workforce**
We need a sustainable workforce into the future, including enough well-trained volunteers, or we may not be able to be there when you need us in future. To attract the future workforce needed, we need to invest in promoting firefighting to potential volunteers and staff.
- **Support our people's safety, health and wellbeing**
We need to continue to provide safety, health and wellbeing support to our people. Our firefighters are regularly exposed to risks in their work and we must provide the right protective equipment and clothing, training and monitoring and wraparound support so they can continue to serve communities safely.

Between 2026 and 2029, we will continue to carry out our main and additional functions at the levels of service that we do now. We are proposing to make the improvements we have outlined above, so we can continue to respond to fires and other emergencies safely and effectively.

2. About Fire and Emergency



CASE STUDY

Working together during Cyclone Gabrielle

When Cyclone Gabrielle hit New Zealand we responded locally, supported by our USAR, drone and water rescue teams. Our people, both volunteer and career, rose to the situation, supporting and responding to communities in need, as well as carrying out our main functions. These teams were supported by people in our Communications Centres, air operations, Regional Coordination Centres, the National Coordination Centre and the National Crisis Management Centre. Our geographic spread means we are able to mobilise people from across the country to help in an emergency response.

In Hawke’s Bay, as well as helping with the clean-up effort, our USAR and Pou Takawaenga Māori (Māori Liaison Officers) supported marae to reopen, providing critical facilities for communities. Our team worked closely with Ngāti Kahungunu, whose marae, kaumātua housing, papa kāinga and urupā were extensively damaged. By establishing a connection with Ngāti Kahungunu, we were able to provide tangible support that has created a positive, enduring legacy.

Our USAR team’s work with Ngāti Kahungunu included flying drones over affected areas, and an extensive clean-up of debris and silt-damaged items to make housing and the Waiohiki Marae available as a community hub. Personnel from Fire and Emergency and Ngāti Kahungunu shared Geographic Information System data. We also arranged to get the Omāhu Marae generator replaced so it could service the surrounding housing.

The result of this work is more than just the clean-up. It has also strengthened the respect and trust between Fire and Emergency and Ngāti Kahungunu. This means we can work together to help increase the community’s resilience, so they are more prepared for future events.

We are still learning from Cyclone Gabrielle about our ability to respond, including how our assets performed. Potential flood risk to some of our fire stations has also been identified. We will be using this information during the 2026-2029 levy period to inform our choices for investment, to help increase our own resilience as a response agency.

Image credit: Stuff



CASE STUDY

Working safely in and around water

The increasing frequency and severity of flooding events has shown the importance of building an in-water rescue capability, although that is not a core function of ours. North Island flooding events at the start of 2023 demonstrated this. Firefighters around the country did some exceptional work responding to these emergencies, often in extreme conditions.

Some of this effort was the work of water response teams assembled for a trial to assess water rescue, called Working Safely in Water. These teams were made up of water safety experts, and people with a suitable swift/flood water rescue qualification.

During the levy period of 2026-2029, depending on funding, our goal is to have more trained and equipped water response teams nationwide.

2. About Fire and Emergency

Response is about being there for you when emergencies happen

With fire stations in almost every community, and a 24/7 response capability, we are usually one of the first agencies to **respond** to fires and emergencies when they happen.

While we are the only national response agency for fires, the following case studies show how communities benefit when we can respond to other emergencies, which are our additional functions.

Reducing the risk of fire is the most effective way to prevent harm to people. It also prevents and limits damage to property and the environment.

Fire risk reduction is one of our main functions, and an essential part of our role as the national fire authority and fire regulator for New Zealand. We work with communities across New Zealand to reduce the risk of fire, prevent unwanted fires before they occur, and help communities take actions to reduce the consequences when fires do happen.

We work with councils and the building and construction industry to develop and implement rules around fire safety in buildings. This is to protect people in buildings such as high rise buildings, during fires. We do risk assessments of new buildings and recommend changes to existing buildings to improve fire safety.

We provide technical fire safety advice to architects and engineers to support building design. We administer regulations for fire safety evacuation schemes and procedures, for buildings that are likely to be occupied by lots of people.

We work closely with communities to identify local risks and hazards that we can address together through tailored education programmes. Backed by research and data, we design and deliver national programmes in a variety of different ways to educate people on how to reduce the risk of fire. We work with foresters and land managers to reduce the occurrence of wildfires which could devastate communities. We also work with high-risk industries.

We propose to continue delivering these services between 2026 and 2029, making continuous improvements to adapt to community needs as they change.

Our 'You're Cooked' case study is a good example of how we use social media. It helps raise awareness of the risks of cooking under the influence of drugs and/or alcohol among an audience that is typically disengaged from safety messaging.

Since the 'You're Cooked' campaign was launched, we have seen a 7.5% increase in people reporting they are no longer leaving cooking unattended. The success of this campaign shows how the right preventative measures can have a real impact for New Zealand.

2. About Fire and Emergency



CASE STUDY

Close to you when it counts

This case study highlights how communities benefit from our medical emergency co-response.

Every year in New Zealand more than 2,000 people are treated for heart attacks that occur at home or in a public place. Since December 2013, firefighters have been part of the team of health professionals available to respond to heart attacks, assisting Hato Hone St John and Wellington Free Ambulance.

Assisting in medical emergencies is one of our additional activities. This means we can assist at medical emergencies, if we can do so without affecting our ability to carry out our main activities. We respond to over 13,000 medical emergencies each year across New Zealand and this number has continued to climb since we were established.

When there is a suspected heart attack, the Communications Centre immediately dispatches the closest resource – this could be an ambulance or a fire truck.

Dispatching the nearest resource means defibrillation (delivering a dose of electric current to the heart) and CPR (chest compressions) can happen as quickly as possible, which could be before the ambulance gets there. This shared approach between Fire and Emergency and Hato Hone St John has dramatically improved survival rates.

In 2021/22, Fire and Emergency responders were first on the scene at 8% of heart attacks where ambulance staff attempted resuscitation. Defibrillation before an ambulance arrived increased survival rates by up to 20%. Our network of stations, staff and volunteers across New Zealand means that we are local to many emergencies and can be the first responder if we are trained and equipped to do so.

Investment in equipment and in training our people to carry out CPR and use defibrillators means more trained people are available where communities need them in medical emergencies.



CASE STUDY

You're cooked

Each year Fire and Emergency attends an average of 4,159 residential house fires caused by unattended cooking. It's the number one cause of house fires and the number one cause of injury from fires that we attend.

Our fire safety campaigns are designed based on personas that group people by their attitudes and behaviours towards fire safety. The 'Disengaged' make up approximately 20% of the population and are much more likely to leave their cooking unattended or cook under the influence of drugs or alcohol. Data suggests they're more likely to be male, young, working and live in big cities in shared rental accommodation. They have a relaxed approach to life and don't recognise fire safety as an issue.

Our 'You're Cooked' campaign, launched in November 2022, was designed to be disruptive, unmissable, and put fire safety on the radar in a way that feels relevant to the people we want to reach. We know

people are going to prepare food at home while impaired, so our intention is to encourage them to do so safely by helping them to 'stay off the stove'.

We designed recipes catering specifically for drunk and/or high cooks, requiring absolutely no stovetop frying (or oven use). The campaign uses advertising on social media channels, supported by radio and outdoor advertising. We've popped up in bottle stores, in bar bathrooms and on drinks coasters to ensure our audience can't miss us, right in that 'pre-cooked' moment. We even created our own mobile test kitchen and took it for a night out in Auckland, engaging real customers to show them they can forget about the stove for their late-night feed.

Section 2

Have your say on our services

Please give us your views on what we propose to do in 2026 – 2029.

1. Please select the services below which you EXPECT Fire and Emergency to provide (you can tick as many or as few of the boxes as you like)

- Putting out fires – structural and vegetation
- Responding to motor vehicle crashes, including rescuing people trapped in vehicles
- Responding to medical emergencies
- Responding to maritime emergencies
- Responding to extreme weather events and natural disasters, such as floods and earthquakes
- Urban search and rescue services
- Human and animal rescues from swift water and emergencies
- Cleaning up chemical and other substance spills
- Promoting safe handling of hazardous substances
- Developing rural fire plans to reduce the risk of wildfire
- Providing fire safety checks and certifications of buildings
- Fire research and investigation, and incident reporting
- Promoting fire prevention, awareness, and safety in communities and schools
- Assessing building fire safety and developing evacuation plans
- Issuing fire permits

Other (please explain):

2. From the list in Question 1, tell us what is the **most important service we provide**, and what is the **next most important**?

3. Are there activities that we currently don't do, that you think we should do?

Thinking about the services we provide, what would you like to see us doing more of for the community? What would you like to see us doing less of?

4. How would it impact you, your whānau/family or community if we couldn't respond quickly when there was a fire or emergency near you?

5. Please provide any other comments about our response.

3

Our proposed Fire and Emergency levy rates

We receive 97% of our funding through a levy charged on property and motor vehicle insurance policies.

Levy funding arrangements have existed since around 1975, as the former New Zealand Fire Service was largely funded through a levy on property and motor vehicle insurance. When Fire and Emergency was formed in 2017 from over 40 different fire response and prevention services, these levy funding arrangements continued.

A new levy system was set up under Part 3 of the Act (the Part 3 levy). This was to make the levy system sustainable and fairer.

The Part 3 Levy changes who is exempt, who pays the levy, and which rate(s) and/or cap(s) apply. However, introducing the Part 3 levy was deferred until **1 July 2026**. In the meantime, transitional arrangements continue. The Government agreed to increase the transitional levy rate from 1 July 2024 to address urgent cost pressures. We have based costing in this document on the transitional levy rate that will apply from 1 July 2024.

Once the Part 3 levy is introduced, it will replace the transitional levy arrangements. The levy rates will then be reviewed every three years, and we will consult with you each time this happens.

While the Part 3 levy doesn't come into effect until 1 July 2026, decisions on the levy and the associated activities are needed by December 2024, so that the insurance industry has enough time to implement the changes.

The levy must be stable, universal, equitable, predictable, and flexible.

When we consider the impact of changing the levy, we must consider the principles below, which are set out in our legislation. This is to ensure the levy is:

- a **stable** source of funding into the future to make sure our people can do their jobs safely and effectively, for everyone's benefit
- **universal**, so that our costs are generally shared among all who could benefit from services
- **equitable**, so that it makes the system fairer for all
- **predictable**, so policyholders can predict the amounts to pay, and we are able to predict how much levy income we will receive
- **flexible**, so that the levy can adapt to changes in services and our costs.

For the Part 3 levy arrangements from July 2026, we have estimated that our levy funding needs to increase by 5.2% to continue to meet the costs of providing our services. Our proposed rates of levy are based on this.

3. Our proposed Fire and Emergency levy rates

The way costs are allocated has changed, so that it is fairer





We levy four insurance categories as listed below, with different rates proposed for each.

1. **Motor vehicle** (see section 4)
2. **Residential property (home)** (see section 5)
3. **Personal property (contents)** (see section 5)
4. **Non-residential property (a wide range of other property types)** (see section 6).

The Act moved away from the term 'indemnity value'¹ where it was still in use, to calculating levy based on 'sum insured'. Many policies were already using sum insured (or amount insured) so this change is likely to only impact a small minority of policy holders.

Appendix 3 outlines the steps we took to determine the proposed levy rates for each property type.

We have compared the proposed Part 3 levy rates in 2026 to the current transitional levy rates, which will be in place from 1 July 2024.

Proposed Part 3 rate compared to transitional levy rates from 1 July 2024				
				
	MOTOR VEHICLES	RESIDENTIAL PROPERTY	PERSONAL PROPERTY	NON-RESIDENTIAL PROPERTY
Transitional rates per \$100 insured	<p>\$9.53 flat rate Domestic full cover (less than 3.5 tonnes)</p> <p>\$0 Third party cover</p> <p>11.95 cents per \$100 insured Commercial (more than 3.5 tonnes)</p>	<p>11.95 cents per \$100, capped at \$100,000</p>	<p>11.95 cents per \$100, capped at \$20,000</p>	<p>11.95 cents per \$100 non-residential property, uncapped</p>
Proposed Part 3 levy (1 July 2026 to 30 June 2029)	<p>\$40.12 flat rate for each motor vehicle</p>	<p>1.85 cents charged on every \$100 insured up to a maximum sum insured of \$625,000 for residential property</p>	<p>1.85 cents charged on every \$100 insured up to a maximum sum insured of \$75,000 for personal property</p>	<p>11.51 cents per \$100 insured, uncapped</p>

¹ Indemnity (present day value) – what the house or property was worth just before it was damaged. It is roughly equivalent to the depreciated replacement cost of the property or house (not including the land) considering its age and condition.

3. Our proposed Fire and Emergency levy rates

Examples are below, to illustrate the cost impacts of the proposed levy option compared to the transitional levy applying from 1 July 2024, for residential and personal property and motor vehicle policy holders.



SCENARIO 1

Anna and Tikei have a house that’s insured for \$490,000 and contents insurance for \$70,000. They have one car insured for domestic (personal) use. Their current annual levy is \$152.93.

They would pay \$143.93 under the proposed levy. They would pay a higher levy for their car, but less for their home and contents.



SCENARIO 2

Jane and Debbie have a house that’s insured for \$1,400,000 and contents insurance for \$120,000. They have two cars insured for domestic (personal) use. Their current annual levy is \$162.46.

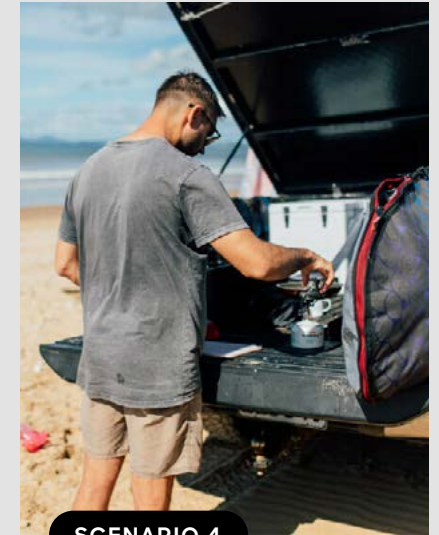
They would pay \$209.75 under the proposed levy. They would pay a bit more overall because their home and contents are insured for significantly more, and they have two vehicles. This reflects the change to make motor vehicles pay a bigger proportion of the overall levy, because motor vehicle emergencies use so much resource.



SCENARIO 3

Kiri is a renter who has personal property insurance for \$70,000 and a car for personal use. Kiri’s current annual levy is \$33.43.

Under the proposed levy Kiri would pay \$53.73. This reflects the change to make motor vehicles pay a bigger proportion of the overall levy, to reflect our increasing response to motor vehicle emergencies.



SCENARIO 4

Jimmy is a renter who has personal property insurance for \$70,000 and three cars for personal use: the everyday car, a ute and a weekend car. Jimmy’s current annual levy is \$52.49.

Jimmy would pay \$133.31 under the proposed levy.

3. Our proposed Fire and Emergency levy rates

The Government has made decisions on exemptions from the Part 3 levy

The Government has recently made decisions on the types of property and insurance classes that will be exempt from the levy. Some types of property that have been exempt under the transitional levy will no longer be exempt under the new levy. The exemption decisions are listed in the table below.

For more information, visit www.dia.govt.nz/firelevy

PROPERTY TYPES EXEMPT

- New Zealand Defence Force property
- Mines and tunnelling operations
- Reservoirs, dams, drains or channels
- Offshore installations
- Cabling and pipelines on the sea floor, breakwaters, moles, and groynes
- Art and collection items held by cultural heritage bodies
- Ships that are registered internationally
- Aircraft that regularly fly international routes
- Goods insured for import and export

ALSO EXEMPT

The following classes of insurance are also exempted to avoid duplicate collection of levy payments.

- Insurance for war and terrorism risks, where the property is also insured under an all-risks policy
- Deductible buydown insurance
- Insurance covering existing property as part of contracts works policies (such as for building and construction)

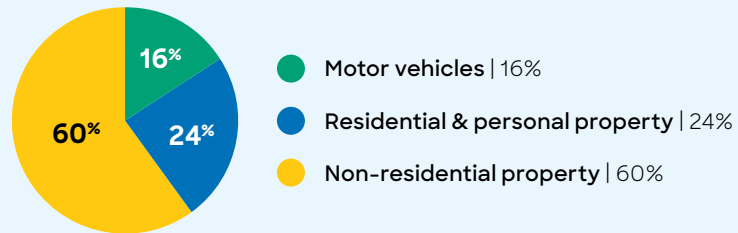
PROPERTY TYPES NO LONGER EXEMPT

- Hazardous substances
- Retaining walls, fences, and walls
- Swimming baths, water tanks, water towers, or septic tanks
- Water reticulation pipes
- Electrical supply and telecommunications cabling
- Livestock, growing crops, silage, and hay
- Transport infrastructure (roads, bridges, streets, paths, tunnels, railway tracks and poles) and quarries
- Forests
- New Zealand ships (i.e. marine vessels of any size)
- Aircraft insured for travel in New Zealand
- Goods insured for transit within New Zealand

Section 3

Have your say on how we set fire levy rates

For the 2026–2029 levy period, we have allocated the net costs to the three types of property, based on the projected costs by activity, as follows:



We propose setting annual levy rates across the different types of insurance as follows:

- \$40.12 for motor vehicle insurance
- 1.85 cents for every \$100 insured, up to a maximum sum insured of \$625,000 for residential property
- 1.85 cents for every \$100 insured, up to a maximum sum insured of \$75,000 for personal property
- 11.51 cents for every \$100 insured for non-residential property, uncapped.

1. Do you think this is a fair way to share the cost across the insurance types? Yes, no, why?

Yes

No

2. Are there any changes you would make to the allocation of levy across the insurance types?

3. What impact would the allocation of levy across the insurance categories have on you, your family and the community?

4. Do you have any other suggestions about the allocation of the levy across the insurance types?

4



Levy Proposal – Motor vehicles

We are responding to more motor vehicle incidents, so we're proposing that a greater share of the levy comes from motor vehicle insurance policies

We collect 7.3% of our revenue from levies on motor vehicles, however a higher proportion of our costs (approximately 16%) are now associated with responding to motor vehicle incidents, such as:

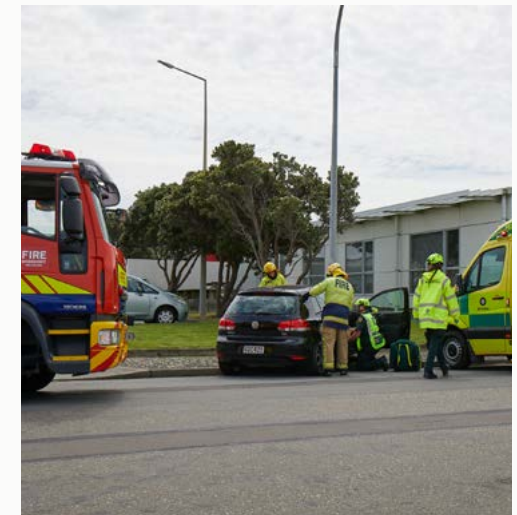
- rescuing people trapped in motor vehicles
- responding to and stabilising incidents involving hazardous substances (e.g. petrol spills)
- helping other emergency services at transport accidents (e.g. clearing the roads)
- responding to medical emergencies at transport accidents.

We think the percentage of the levy received from motor vehicle insurance policies needs to increase to meet the equitable and universal levy principles outlined in Section 3.

We are proposing a flat levy rate of \$40.12 for each insured motor vehicle, including those over 3.5 tonnes (commercial vehicles).

For the first time, this will include 'third party' insurance policies to more fairly reflect how we respond to motor vehicle incidents.

Commercial vehicles are currently levied at the commercial property rate of 11.95 cents per \$100 insured. They contribute nearly half of the total motor vehicle levy funding, even though they represent around 5% of the total number of vehicles insured. Moving to an overall flat rate for all motor vehicles will see less collected from commercial vehicles and more from domestic vehicles.



4. Levy Proposal – Motor Vehicles

The table below shows how this compares to what you are paying now for motor vehicles.

	LESS THAN 3.5 TONNES (DOMESTIC)	LESS THAN 3.5 TONNES (DOMESTIC)	OVER 3.5 TONNES (COMMERCIAL)	OVER 3.5 TONNES (COMMERCIAL)
Type of cover	Full cover (or Comprehensive) Third party fire and theft	Third party	Full cover (or Comprehensive) Third party fire and theft	Third party
Current annual levy cost	\$9.53 (flat rate)	\$0 (not levied)	11.95 cents per \$100 insured (no cap)	\$0 (not levied)
Proposed annual levy cost	\$40.12 (\$30.59 more)	\$40.12 (\$40.12 more)	\$40.12 (may be more or less)	\$40.12 (\$40.12 more)

A previous table included some errors. These have now been corrected.

Section 4

Have your say on proposed motor vehicle rates

We are proposing to charge a flat rate of **\$40.12 annually** for all motor vehicle insurance.

1. Do you support this change for motor vehicles, less than 3.5 tonnes (domestic), full cover? Yes, no, why?

Yes

No

2. Do you support this change for motor vehicles, less than 3.5 tonnes (domestic), third party fire and theft cover? Yes, no, why?

Yes

No

3. Do you support this change for motor vehicles, more than 3.5 tonnes (commercial), both full and third party fire and theft cover? Yes, no, why?

Yes

No

4. Do you think this is fair way to share the cost across motor vehicle insurance holders? Yes, no, why?

Yes

No

5. Are there any changes you would make to these proposed rates for motor vehicle insurance holders? Why?

6. How would the levy proposal for motor vehicles impact you, your whānau/family and community?

5

Levy proposal – Residential & personal property

Our data on the incidents we respond to shows that we can decrease the overall share of revenue collected from both residential² and personal property policies to meet the principles of equity and universality.

We provide the following services, which residential and personal property can potentially benefit from:

- putting out fires in homes and surrounding buildings and vegetation
- fire safety education (e.g. escape planning, safer use of heaters, fireplaces, and dryers)
- fire prevention (e.g. home safety visits to check and install smoke alarms)
- fire design regulation to ensure buildings are safe for people
- responding to severe weather events and natural disasters (e.g. flooding, earthquakes)
- responding to medical emergencies such as cardiac arrest
- rescues (including animals).

Data from the insurance industry shows that between 80 and 90% of residential properties are insured. We want to help make sure that levy changes are not a barrier to people taking out insurance, so we also considered affordability.

We are proposing to reduce the levy on personal property insurance from 11.95 cents per \$100 insured to 1.85 cents per \$100 insured and adjust the caps for both.

The tables below show you the options, and which option we prefer.

Summary of levy options per \$100 insured

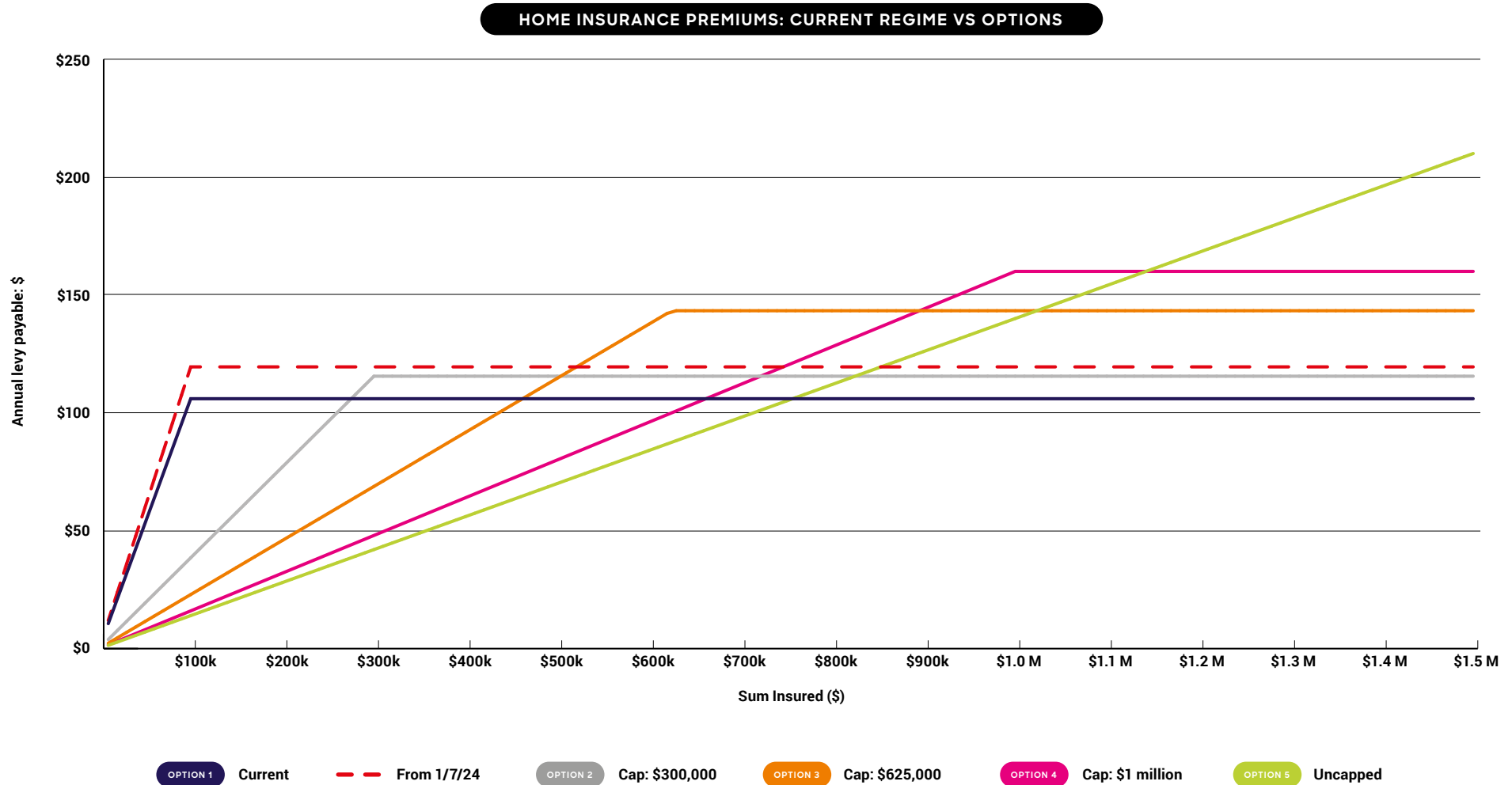
	OPTION 1 (as at 1 July 2024) 11.95 cents	OPTION 2 3.33 cents	OPTION 3 1.85 cents (preferred)	OPTION 4 1.52 cents	OPTION 5 1.37 cents
Residential property cap	\$100,000	\$300,000	\$625,000	\$1,000,000	Uncapped
Personal property cap	\$20,000	\$20,000	\$75,000	\$75,000	Uncapped

² The definition of residential property will change how mixed-use buildings are levied. Under the transitional levy system, any mixed-use building that is more than 50% residential is treated as wholly residential property and pays the residential property levy. The new levy system will mean that residential parts of mixed-use buildings will pay a residential property levy rate, while non-residential parts will pay a non-residential property levy rate.

5. Levy proposal – Residential & personal property

The graph below shows differences in each of these options

Annual levy rate payable under alternative options



5. Levy proposal – Residential & personal property

OPTION 1

Remain consistent with transitional levy regime from 1 July 2024

From 1 July 2024, both residential and personal property insurance policies will be charged at a rate of 11.95 cents (excl. GST) per \$100 insured.

For residential property, the maximum insured amount (the cap) is \$100,000 (a maximum annual levy of \$119.50).

For contents, the cap is \$20,000 (a maximum annual levy of \$23.90).

We estimate that over 99% of residential property policies and about 90% of personal property policies are paying the maximum amounts of levy. This results in a flat contribution from most policy holders, which aligns with our significant readiness costs. However, this option doesn't meet the equitable principle as it doesn't reflect a different cost for larger or more complex insurance policies.

OPTION 2

Increased residential levy cap

This option raises the maximum residential property levy cap to \$300,000. This cap is the same as the cap on the Earthquake Commission levy.

The levy rate is reduced to 3.33 cents (excl. GST) per \$100 insured. Most people would pay about the same amount, but those with lower insured values would pay a bit less.

OPTION 3

Updated caps (our preferred option)

This option updates the maximum insured amounts and lowers the levy rate.

We propose a levy rate of 1.85 cents (excl. GST) per \$100 insured and a maximum insured amount for residential property of \$625,000 and for personal property of \$75,000.

This would mean a maximum levy of \$115.63 for residential property (an increase of \$9.63) and a maximum levy of \$13.88 for personal property (a saving of \$7.32).

About half of levy payers would pay less under this system.

We think this approach best meets the equity and universal principles for setting levies in the Act. This is our preferred option.

OPTION 4

Further increased residential sum insured cap

This option raises the maximum insured amount for residential property to \$1,000,000, and to \$75,000 for personal property. The levy rate would be reduced to 1.52 cents (excl. GST) per \$100 insured.

Most policy holders will pay different total levies because, based on current data, most insured values don't reach the maximum limit. We calculate that this will result in about a quarter of all levy payers paying the maximum amount.

OPTION 5

No maximum limits applied

This option would change the way levies are calculated for residential and personal properties and would mean that no maximum limits are applied.

Under this option, we propose a levy rate at 1.37 cents per \$100 insured.

Our analysis indicates this option distributes costs relatively evenly across all property types. This 'no caps' option collects more from higher-value policies, especially the top 10%, and less total levy revenue from lower-value policies.

Even though this option seems fair, it isn't equitable because of the fewer levy payers, who have higher sums insured, will contribute more levy. This may unfairly distribute the levy amongst those who use or benefit from our service.

The table on the following page compares the different amounts payable under all five options in various scenarios.

5. Levy proposal – Residential & personal property

Example of cost impacts for different residential and personal property levy options, compared with the levy system in place from 1 July 2024

			Residential property, sum insured \$80,000	Residential property, sum insured \$490,000	Residential property, sum insured \$1,400,000	Personal property, sum insured \$18,000	Personal property, sum insured \$70,000	Personal property, sum insured \$120,000
OPTION 1	Current system	11.95 cents per \$100 insured (\$100k, \$20k caps)	\$95.60	\$119.50*	\$119.50*	\$21.51	\$23.90*	\$23.90*
OPTION 2	Increased home sum insured cap	3.33 cents per \$100 insured (\$300k, \$20k caps)	\$26.64 (\$68.96 ↓)	\$99.90* (\$19.60 ↓)	\$99.90* (\$19.60 ↓)	\$5.99 (\$15.52 ↓)	\$6.66* (\$17.24 ↓)	\$6.66* (\$17.24 ↓)
OPTION 3	Updated caps (preferred)	1.85 cents per \$100 insured (\$625k, \$75k caps)	\$14.80 (\$80.80 ↓)	\$90.65 (\$28.85 ↓)	\$115.63* (\$3.87 ↓)	\$3.33 (\$18.18 ↓)	\$12.95 (\$10.95 ↓)	\$13.88* (\$10.03 ↓)
OPTION 4	Further increased home sum insured cap	1.52 cents per \$100 insured (\$1m, \$75k caps)	\$12.16 (\$83.44 ↓)	\$74.48 (\$45.02 ↓)	\$152.00* (\$32.50 ↑)	\$2.74 (\$18.77 ↓)	\$10.64 (\$13.26 ↓)	\$11.40* (\$12.50 ↓)
OPTION 5	No caps	1.37 cents per \$100 insured	\$10.96 (\$84.64 ↓)	\$67.13 (\$52.37 ↓)	\$191.80 (\$72.30 ↑)	\$2.47 (\$8.46 ↓)	\$9.59 (\$16.25 ↓)	\$16.44 (\$23.10 ↓)

* Maximum levy reached

↓ Decrease against the current system

↑ Increase against the current system

Section 5

Have your say on proposed residential & personal property rates

We are proposing to lower the levy on residential property insurance from 11.95 cents to 1.85 cents per \$100 insured and adjust the cap to \$625,000. This would result in a maximum annual levy of \$115.63 on all residential property.

1. Do you think this is a fair way to share the cost across residential property insurance holders? Why/why not?

2. What alternative would you propose?

We are proposing to lower the levy on personal property insurance from 11.95 cents to 1.85 cents per \$100 insured and adjust the cap to \$75,000. This would result in a maximum annual levy of \$13.88 on all personal property.

3. Do you think this is a fair way to share the cost across personal property insurance holders? Why/why not?

4. What alternative would you propose?

5. How would our proposed residential and personal levy rate impact you and your whānau/family?
(For example, do you think it could impact your insurance choices?)

6. Do you have any other comments on our proposals for rates of residential and personal property insurance?

6



Levy Proposal – Non-residential property

We're planning to lower the levy for non-residential property because our calculations show that a growing number of commercial properties will be leviable in the future.

Non-residential property is a wide, catch-all category covering many different property types that are insured against fire.

The definition of residential property in Part 3 of the Act has changed slightly from the previous definition, and this means that non-residential parts of mixed-use buildings will pay the non-residential levy.³ An example of this would be some retirement villages.

We provide the following services, which non-residential property insurance holders can potentially benefit from:

- putting out fires in industrial or commercial buildings, crops/plantations and surrounding vegetation
- fire safety education (e.g. fire plans, wildfire readiness)

- fire prevention (e.g. checking fire alarm and sprinkler systems, installing smoke alarms), fire safety design requirements
- responding to severe weather events and natural disasters (e.g. flooding, earthquakes)
- providing for the safety of people and property endangered by incidents involving hazardous substances (e.g. chemical spills, toxic fumes)
- promoting safe handling, labelling, signage, storage, and transportation of hazardous substances
- rescues (e.g. from collapsed buildings, lifts).

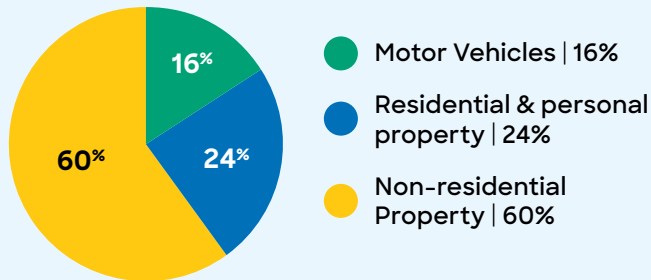
The levy proposal to continue with uncapped maximum insured amount for non-residential property is to recognise the difference between non-residential and residential property types in relation to response effort and cost of this.

3 See Section 5: Levy proposal – Residential and personal property

Section 6

Have your say on proposed non-residential property rates

For the 2026–2029 levy period, we have allocated the net costs to the three types of property, based on the projected costs by activity, as follows:



We are proposing a slight decrease in the levy on non-residential property insurance from 11.95 cents to 11.51 cents per \$100 with no maximum levy amount.

1. Do you think this is a fair way to share the cost across non-residential property insurance holders? Why? (yes, no, why?)

Yes

No

2. What alternative would you propose? Why?

3. Do you think there should be a cap on non-residential property insurance? Why/why not?

4. How would our proposed non-residential levy rate impact you?

5. Do you have any other comments on our proposals for rates of non-residential property insurance?

7

Submit your feedback

The closing date for submissions is 5pm Friday 17 May 2024.

Submissions can be emailed to:

levyfeedback@fireandemergency.nz

Or posted to:

Part 3 Levy Consultation
Fire and Emergency New Zealand
PO Box 2133
Wellington 6140

7. Submit your feedback

This submission was completed by:

Name

Address

Email

On behalf of (if an organisation)

Position (if an organisation)

Please refer to the beginning of this document for how we will use your information, including considerations under the Official Information Act 1982 and Privacy Act 2020.

Please tick here if you do **NOT** wish your submission to be included in any summary of submissions that we may publish.

Questions

You don't need to answer all of our consultation questions. Feel free to limit your responses to those topics of most relevance or interest to you.

Please indicate any part of your submission that you believe should be withheld under the Official Information Act, and the reason(s) for withholding it.

General

1. Are you providing feedback as a representative of a business or organisation?

- No – As an individual
- Yes, on behalf of:
- government organisation
 - private business
 - industry association
 - community group
 - Non-Government Organisation (NGO)

Name of business or organisation:

2. Please indicate which region you live in, or your organisation represents:

- National
- North Island
- Northland
- Auckland
- Waikato
- Bay of Plenty
- Gisborne
- Hawke's Bay
- Taranaki
- Whanganui – Manawatu
- Wellington
- South Island
- Marlborough
- Nelson – Tasman
- West Coast
- Canterbury
- Otago
- Southland

7. Submit your feedback

3. To help us better understand your feedback, please indicate which type(s) of the following insurance policies you hold:

- Motor vehicle insurance (full coverage)
- Motor vehicle insurance (third party)
- Property insurance
- Contents insurance
- Commercial property insurance
- I don't hold any insurance

4. My insurance is held predominantly:

- Locally – New Zealand insurance firm
- Internationally – through a New Zealand broker
- Internationally – direct
- I don't know

5. Are there any other matters you think Fire and Emergency should consider when implementing these levy proposals?

- Yes. If so, what?

- No

6. Do you have any other comments you would like to share on the proposed Fire and Emergency insurance levy for 2026-2029?

7. Would you like to upload a file with your submission?

Please attach to the email or letter if sending in the post.

8. Contact Details

Name

Address

Email

9. Do you consent to being contacted about your submission and/or provided with further information about the Fire and Emergency Levy Consultation?

- Yes
- No

Thank you for taking the time to give your feedback.

Appendix 1: Our costs for 2026–2029

The table below shows our estimated costs for 2026–2029.

Forecast costs over the levy period 2026-2029

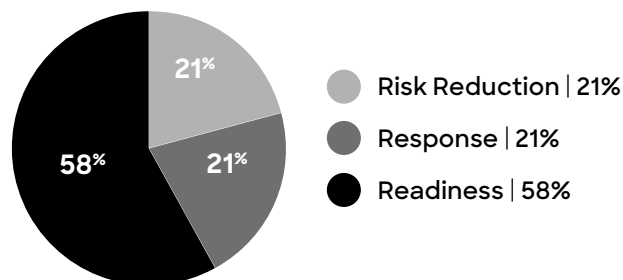
(\$ million excl. GST)	2026/27	2027/28	2028/29	Total	% of Total
Operating Costs					
Salaries and Wages - Firefighter	337	354	368	1,059	39%
Salaries and Wages - Non-Firefighter (includes staff supporting front line staff)	160	168	168	496	18%
Other Personnel*	35	35	35	104	4%
Information and Communications Technology	49	46	47	143	5%
Clothing & Uniforms and Operational Equipment & Consumables	35	39	40	113	4%
Fleet operating and maintenance	31	32	32	95	4%
Building Occupancy	28	28	29	84	3%
Professional fees/Consultancy	26	24	25	75	3%
Finance Costs (Interest and Loan Repayments)	27	14	13	54	2%
Travel	16	16	17	49	2%
Other Expenses	14	14	14	42	2%
Volunteer Expenses	14	14	14	42	2%
Grants & Donations	12	12	13	37	1%
Insurance	6	6	6	17	1%
Total	788	800	820	2,409	90%
Capital Costs					
Capital - Property	47	63	73	183	7%
Capital - Fleet	27	28	28	83	3%
Capital - Equipment	11	11	11	33	1%
Capital - ICT	11	11	11	33	1%
LESS Non-Levy Revenue	(15)	(16)	(16)	(47)	-2%
Total	81	96	108	285	10%
Total	869	897	928	2,694	100%

* 'Other personnel' include all other personnel costs such as (but not exclusive to) training, recruitment, the cost of contractors.

Appendix 1: Our costs for 2026–2029

The costs of delivering our activities

We allocate our costs to response or risk reduction, with associated readiness costs.



The table opposite breaks down our forecast costs for the 2026-2029 period (\$2,693.50 million) by activity. We've further divided the costs based on whether they're related to response or risk reduction and removed any non-levy revenue or expenses.

Many response activities also have a readiness and corporate overhead cost. We distribute these costs across our main response activities (our section 11 functions under the Act), which require a nationwide network of fire stations, fire engines, and personnel ready to respond.

We haven't allocated any readiness overheads to our section 12 activities. This is because we can only assist in these activities if:

- we have the capability and capacity to do so (trained staff available with the right equipment to deliver these functions safely)
- it doesn't interfere with our ability to do our main response activities.

We are currently updating our definitions of corporate and readiness overheads costs as they relate to supporting delivery of our services.

Forecast costs for each function required by the Act, 2026-2029

(\$ million excl. GST)	Direct costs of response	Corporate overheads	Readiness overhead	Non-levy (revenue) / costs	Total costs
Fire Response - Structural	119	75	376	(1)	569
Fire Response - Vegetation	157	100	498	(5)	751
Fire Response - Other	109	69	346	(3)	521
Motor Vehicle Response	70	44	221	(2)	333
Natural Disaster Response	7	5	0	(0)	12
Urban Search and Rescue	16	10	52	(1)	78
Non-transport Related Rescue	2	1	6	(0)	9
Medical Response	36	23	0	(1)	58
Other Responses	29	18	0	(1)	47
Hazardous Substances	16	10	51	(1)	77
Advice on Hazardous Substances	1	1	0	(0)	2
Fire Prevention	78	50	0	0	128
Education	55	35	0	(1)	88
Monitor and Enforcement	8	5	0	(0)	13
Advice on Building Design	6	4	0	(0)	10
Total	709	452	1,550	(17)	2,694

Appendix 2: Assumptions

Projecting our future costs into the medium term relies on some assumptions. We acknowledge that things change and that our planning will need to adjust to respond. Our calculations assume the following:

- Our existing network of stations, fire engines and equipment, and workforce will remain largely the same.
- We will maintain our capabilities at their current levels, including replacing our assets at the end of their useful lives.
- The value of our money now will be largely the same as at the end of the levy period in 2028/29.
- Our operating costs will increase in line with the Treasury's economic forecasts.
- Our current costs of response will increase with inflation.
- The number of insurance policies and their value will not change materially, from the current financial year 2023/24 through to the end of the levy period in 2028/29.
- The change from indemnity values to a sum insured system will only have a minor impact on the total levy collected.
- Our cash reserve of \$50m, in accordance with Treasury guidelines, will remain sufficient as working capital to fund our day-to-day operations.



Appendix 3:

Steps involved in calculating proposed levy rates

This is a five-step process as follows:

Step 1: Determine Activities

We determine our activities for the period covered by the levy. Section 2 talks about our activities.

Step 2: Allocate costs across these activities

We then budget, forecast, and allocate the net cost of providing those activities. We use the same allocation for each of the three years.

Our readiness overhead (being ready to respond) makes up around 58% of our net costs (\$1,550m out of \$2,694m) and is our largest category. Readiness means making sure we're prepared for the next call. This includes making sure we have our people, tools and specialist equipment where they are needed, and the right skills and training to be able to respond safely.

Step 3: Allocate costs per activity across the three types of property

We've allocated costs across the three types of levy (motor vehicle, residential and personal property, and non-residential property).

The levy must cover almost all the net costs of our services or activities. This means that if there is a policy decision that affects the proportion of how the costs are allocated in any property class, the other property class(es) will be affected. This ensures the full cost of providing our services is covered.

Step 4: Estimate the number in each levy group

The number and size of the insurance policies that are to be levied is often referred to as the 'levy base'.

Step 5: Calculate levy rates

The net costs (Step 3) allocated to each property type (residential and personal property, motor vehicle and non-residential) is divided by the relevant levy base (Step 4) to determine rates. We adjust these calculations as necessary to account for any proposed levy caps.

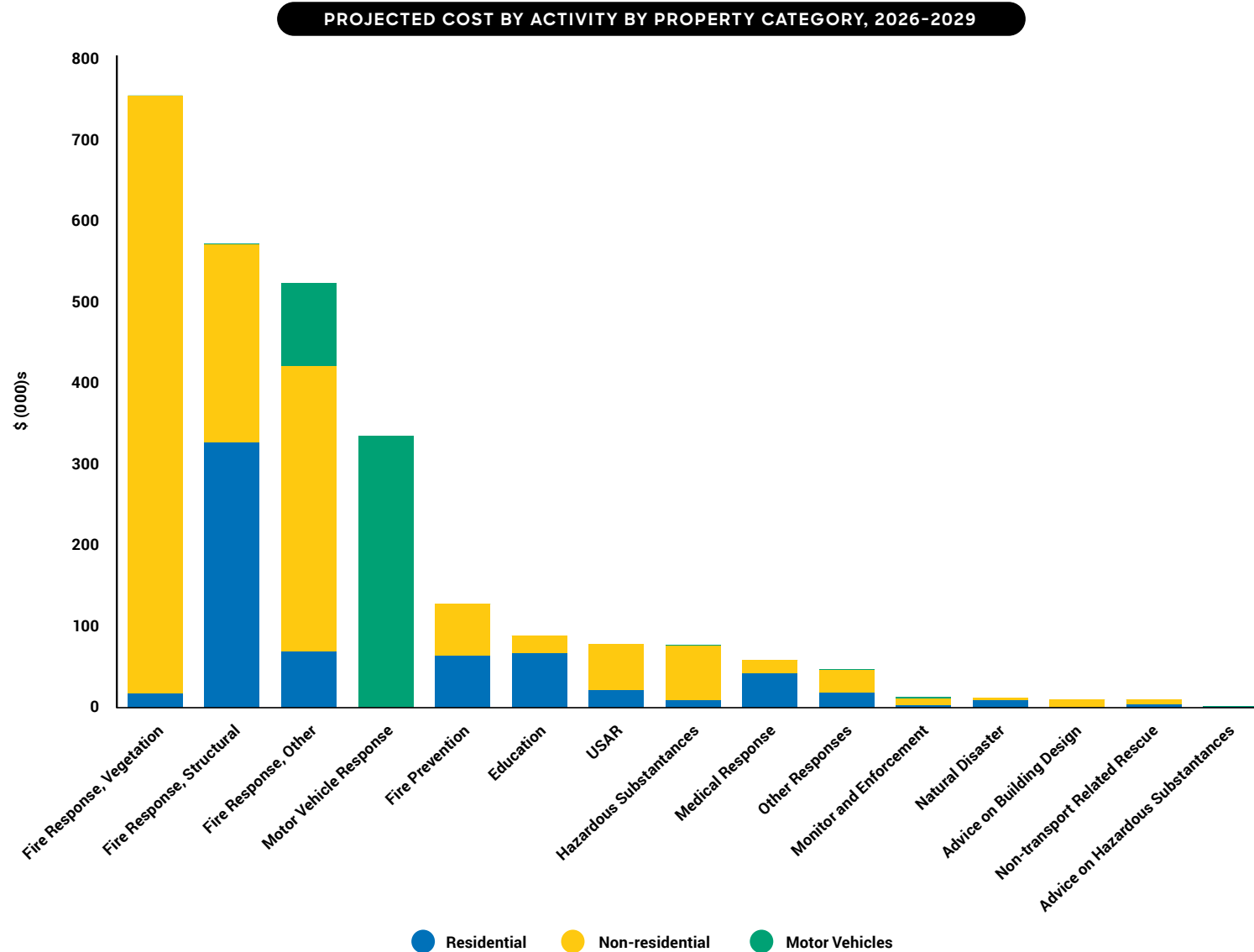
For motor vehicles, the levy is a dollar amount for each insured motor vehicle. For residential and personal property and non-residential property, the rate is expressed as cents per \$100 of the amount insured.

For the 2026-2029 levy period, we have allocated the estimated net costs to the three types of property as follows:

	2026/27	2027/28	2028/29	
	\$ (000)			Share
Residential and Personal Property	208,478	214,985	222,094	24.0%
Non-residential Property	519,346	535,623	554,832	59.8%
Motor Vehicles	140,680	146,238	151,229	16.2%
Total	868,504	896,846	928,155	

A previous version of this table had the row labels in the incorrect order. This has now been corrected.

Appendix 3: Steps involved in calculating proposed levy rates



Appendix 4:

Levy revenue options we considered

Options	What would happen to our levy revenue	What this would mean for us	What this would mean for our services to you
Option 1	No additional increase	<ul style="list-style-type: none"> We would not be able to fund our 2026-2029 forecast operating costs and capital expenditure. We would need to further reduce costs by \$339m over the levy period of 2026 to 2029. In the first year of the levy period, our cash reserves would fall below the minimum level required (\$50m) to manage our risks. 	<ul style="list-style-type: none"> There would be significant delays in replacing fire appliances and other equipment and in updating or making fire stations resilient. This would likely lead to slower response times and more equipment failures or, in the most extreme cases, forced closure of stations. There would be reduced ability to assist in natural disasters, such as flooding or earthquake.
Option 2	3.57% increase	<ul style="list-style-type: none"> We would need to use up our cash reserves and would have none left by 2030. This would mean being unable to cover levy payment shortfalls or meet unexpected additional expenses or external costs. We would have to borrow to fund these. 	<ul style="list-style-type: none"> This would slow down but not stop the decline in our assets. This means there is an associated risk that we may not be able to respond adequately in an emergency. We would need alternative funding to cover additional costs arising from a significant or long-duration response.
Option 3 Preferred option	5.2% increase (proposed; the basis of our levy rate proposals in Sections 4-6)	<ul style="list-style-type: none"> We would have sufficient revenue to operate as planned over the levy period, including maintaining \$50m cash reserves. We would maintain our current capabilities with a slight uplift to address some asset remediation. 	<ul style="list-style-type: none"> This would help minimise risk to staff and service delivery so that we could continue to meet our current performance targets for response. It would fund planned investment in our network of fire stations and fire engines, to maintain our existing geographical coverage.
Option 4	7% increase	<ul style="list-style-type: none"> This would likely increase cash reserves beyond requirements, leading to cash surpluses. This would give us more cash after 2030 and we would have a surplus to invest in bringing priority areas of work forward. 	<ul style="list-style-type: none"> Helps us to meet loan repayments. Provides a further buffer against increased costs and demands on resources from increasing severe weather events. Enables us to speed up our work to fix our fire stations, renew equipment and replace aging fire trucks. Allows us to plan and build more resilience into our assets.



WHAKAROTONGA IWI

FIRE
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NEW ZEALAND