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25 October 2024

Department of Internal Affairs  
Te Tari Taiwhenua

Email: [communityresilience@dia.govt.nz](mailto:communityresilience@dia.govt.nz)

Tēnā koe,

**Waikato Regional Council submission on the proposals for regulations for natural hazard information in LIMs**

Thank you for the opportunity to submit on the proposals for regulations for natural hazard information in LIMs. Please find attached the Waikato Regional Council's (the council's) submission, formally endorsed by Submissions Subcommittee on **24 October 2024**.

Should you have any queries regarding the content of this document please contact Alejandro Cifuentes, Team Leader, Policy Implementation directly on (07) 8592786 or by email [Alejandro.Cifuentes@waikatoregion.govt.nz](mailto:Alejandro.Cifuentes@waikatoregion.govt.nz).

Ngā mihi nui,

A handwritten signature in black ink that appears to read "Tracey May".

*PP* Tracey May  
**Director Science, Policy and Information**

## **Submission from Waikato Regional Council on the proposals for regulations for natural hazard information in LIMs**

### **Introduction**

1. We appreciate the opportunity to make a submission on the proposals for regulations for natural hazard information in LIMs.
2. The council recognises the importance of providing information about natural hazards and associated risks to our communities, and supports provisions aimed at improving the information provided in a LIM and ensuring a more collaborative approach to information sharing between regional and district councils. The council is already working closely with the region's territorial authorities (TAs) to share information through the Waikato Regional Hazards Portal<sup>1</sup> (the portal). Further, we note that the TAs within the Waikato region already include a link to the portal and a note in their LIM reports to request further information from the council on natural hazards and risk.
3. We support standardising key natural hazards information to give property buyers access to quality information so that they can make well-informed decisions and manage the risks from natural hazards.
4. Our submission answers the consultation document's questions and provides comment on specific clauses noted in the tables attached at the end of this document, and can be summarised as follows:
  - a. Clear direction is crucial to effectively implement the regulations. The council advocates for standards and stronger direction, given the limited role of guidance in the New Zealand system.
  - b. We highlight the importance of the correct use of technical terminology to distinguish between risks and hazards.
  - c. The effective implementation of the regulations may be limited by capacity of different local government authorities. Therefore, it is important the regulations provide clear direction on the amount of work required.
  - d. The council advocates for a nationally consistent approach based on workable regulations.
5. We look forward to further participating in the process to refine the regulations and welcome the opportunity to comment on any issues explored during their development.

### **Submitter details**

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<sup>1</sup> <https://www.waikatoregion.govt.nz/services/regional-hazards-and-emergency-management/regional-hazards-portal/>

## General comments

### Limited effectiveness of guidance

We recommend the Minister of Internal Affairs investigate regulatory tools to provide standards and takes a more directive approach to implementing the regulations.

6. We note that guidance has a limited role in the New Zealand system. In a recent decision, the Environment Court reiterated that guidance, whilst helpful, is not legally binding.<sup>2</sup> The effectiveness of any guidance provided by the Department of Internal Affairs (DIA) and Taituarā largely depends on the willingness of local government to consistently implement that guidance. We highlight for example the emergency management sector, and how it has been struggling for consistency for years, given central government's ongoing preference to provide guidance rather than standards.
7. We suggest investigating an amendment to the proposed regulations to create a system of approved codes of practice to record natural hazards information in a LIM. This could use similar mechanisms to the ones under the Health and Safety at Work Act 2015 to develop approved codes of practice.

### Use of terms hazard and risk

The terms 'hazard' and 'risk' should not be used interchangeably. Any further work on guidance and/or the regulations should make careful use of technical terminology to avoid confusion.

Any further work on the regulations or guidance should clearly reflect section 44B of the Act, making clear that *climate change impacts* refer to an exacerbation of the natural hazard and not the impact of climate change on people.

8. We note the consultation document uses the word *risk* interchangeably with *hazard*. It is clear in regulations 6 and 15 that TAs and regional councils do not need to undertake and provide property specific risk assessments. However, the consultation document notes the main effect of regulation 9 as giving "the reader an easy to find, all-in-one-place list of technical reports on natural hazard **risks** that relate to a property in a LIM." The use of risk in this context is incorrect, because the regulation clearly states that we are to provide **hazard** information. We recommend ensuring that any guidance or regulations carefully consider the use of the term **risk** to avoid confusion.
9. Similarly, we note that under the objectives of the legislation, the consultation document states: "a new high-level purpose to ensure that LIMs contain understandable information about natural hazards including **climate change impacts**." This terminology can lead to issues in implementing the regulations, as regional councils would only provide **hazard** information and not risk information (which encompasses impacts).
10. We encourage DIA to keep the language consistent with the wording under section 44B(1)(b) – impacts of climate change that exacerbate natural hazards. This will make it clearer that the Act and regulation refer to how climate change will impact the hazard, and not the impact of climate change on people.

<sup>2</sup> *Gray v Dunedin City Council* [2023] NZEnvC 45, retrieved from: <https://www.justice.govt.nz/assets/Documents/Publications/2023-NZEnvC-045-Gray-v-Dunedin-City-Council-v2.pdf>

## Criteria for relevance

Criteria to assess relevance of natural hazards information is key for regulation 7 to be effectively implemented.

11. The council notes that regulation 7 requires TAs to include in the natural hazards section, all the relevant natural hazard information. We recommend developing criteria to narrow down 'relevant', to determine what type of technical reports and information are required to add onto the LIM. This would be for a more efficient implementation of the regulations. Without a set of criteria to narrow down the information, local government authorities would spend a significant amount of time and resources going through their whole document management system to identify all reports relating to the land concerned.

## Waikato Regional Council questionnaire responses

Question	Comments
<p>1. Will the regulations ensure that LIMs provide property buyers with natural hazard information that is clear, concise, easy to understand and presented in a way that is nationally more consistent?</p>	<p>In terms of the proposed structure, yes, this will provide a consistent approach across the whole country – it is a good approach in terms of bringing together various sources of natural hazards information into one place. However, there are significant challenges in providing natural hazards information in a concise format, especially if there are multiple links to multiple datasets and different reports.</p> <p>Regulations need standardised direction to meet the stated objectives of clarity, conciseness and easiness to understand. We have commented on regulation 10, calling for guidance on symbology, mapping and hazard classification. These need to be clarified with national guidance (which we acknowledge the government and Crown Research Institutes are currently working on) if we want information to be provided consistently.</p> <p>Further, we highlight our comments made on the limited effectiveness of guidance in the general section of this submission.</p>
<p>2. Do the regulations provide certainty to local authorities on the natural hazard information they need to share?</p>	<p>The regulations provide a basic level of certainty. It is clear that regional councils must provide natural <b>hazard</b> information, and that sharing property specific <b>risk</b> information is not required. However, there are some instances where more clarity is needed:</p> <ul style="list-style-type: none"> <li>• Where the local government authorities have information that is not property specific on risk, but relates to local/regional/community level, e.g. if a community level risk assessment has been undertaken to inform a subdivision development: <ul style="list-style-type: none"> <li>○ This is information related to natural hazards that includes a risk assessment.</li> <li>○ It is not clear from the regulations if this risk information should be provided, since it isn't property specific risk information.</li> </ul> </li> <li>• Where the regional council downloads and uses another organisation's data for internal research, e.g. downloading and internally using a GNS dataset to inform a community fault model. <ul style="list-style-type: none"> <li>○ The regulations need to recognise that some information may not be owned by regional councils.</li> </ul> </li> <li>• We also note that there is additional publicly available information that provides natural hazards information, such as the EQC portal, Landslide database, etc. The regulations should be clear about any requirement for territorial authorities to provide this information in the LIM, given its public availability. <ul style="list-style-type: none"> <li>○ Under regulation 10(b) TAs have to provide this information. However, we consider regulations under the LGOIMA do not bind organisations other than local government</li> </ul> </li> </ul>

Question	Comments
	<p>authorities. Therefore, is less likely that the information would be provided in the correct format to ensure they are meeting the regulations.</p>
<p>3. Are the regulations efficient and technically feasible for local authorities to implement and administer?</p>	<p>We consider that TAs and regional councils will be able to meet the requirements under the regulations relatively easily, however, as noted in our response to question 2, further clarification is required on aspects related to risk and information sitting outside local government authorities' ownership and management.</p> <p>We see challenges related to technical feasibility. Currently, local government authorities are doing hazard modelling/classification/communication in their own way and how they see fit. However, we consider that a nationally consistent approach will depend on prompt and fit-for-purpose guidance. This should include guidance of applicability/use of the datasets, and guidance of symbology, hazard classification and model development.</p> <p>It will be easier for those that have existing applicable natural hazard data sharing and dissemination systems. However, for those councils that don't have these systems in place, there will be a considerable cost to develop and implement them. It is important to note many local government organisations do not implement metadata well and this may come to the fore with publicly released natural hazard information.</p>
<p>4. Will the regulations work for expected developments in natural hazard information and meet future LIM users' needs?</p>	<p>The regulations are a good starting point, and we anticipate they will shape future development of natural hazards information systems.</p> <p>Some challenges remain in relation to information produced by applicants to support resource consents. These sources of information will not be subject to the same requirements as the reports commissioned by district and regional councils. Sometimes that information may not be the most robust and could be developed without using a consistent methodology across the region/country. As mentioned in the general part of this submission, these situations could be addressed by issuing standards that direct the contents and format of a technical report to fulfil the requirements of the regulations.</p> <p>We highlight that these regulations will impact the eventual formulation and implementation of the National Policy Statement (NPS) on Natural Hazards Decision-making, where the focus lies largely on property/local level risk assessments to determine if the risk is tolerable, acceptable or intolerable. We</p>

Question	Comments
	<p>encourage DIA to work with the Ministry for the Environment to ensure the NPS aligns with the direction under the proposed regulations.</p> <p>We also caution using future modelled data, such as climate change scenarios, where there is uncertainty. In our clause-by-clause analysis, we suggest adding information on timeframe used for any projections or modelling in regulation 9.</p>
Guidance and other support for local authorities	
<p>5. We would like to hear from you on what specific areas the guidance should cover. We also welcome your thoughts on what other support local authorities will need.</p>	<p>Key support local authorities will need:</p> <ul style="list-style-type: none"> <li>• National consistency on hazard classification, modelling guidance, and mapping symbology guidance.</li> <li>• Applicability/usability scales are essential for all the datasets tagged on the LIMs, to ensure the data is being used appropriately. To only link the datasets for people to see is not sufficient, they need guidance on what those datasets can actually be used for, e.g. disclosures on whether or not a dataset could be used for a person to secure property specific insurance.</li> <li>• From a geospatial perspective we recommend producing guidance or standards that include the following: <ul style="list-style-type: none"> <li>○ Standards at which applicable data is no longer considered to be in development or draft form and must be used in LIMs</li> <li>○ Noting a scale range of the data (e.g. 1:10,000 to 1:1,000)</li> <li>○ Providing standards for metadata that must also be supplied with the data for LIMs</li> <li>○ Providing for a reasonable and acceptable peer review process for any modelling and analysis used in natural hazard information that will be included in a LIM</li> <li>○ Providing minimum requirements for modelling and analysis verification and validation, along with a pathway for councils to still use modelling and analysis where the required validation and/or verification is unfeasible – such as for when the cost to do so is prohibitive, it is technically impossible, or for future climate change scenarios where uncertainty is manifestly significant</li> <li>○ Providing standard disclaimers to be used when applicable</li> <li>○ Ensuring the natural hazard information in LIMs is easily viewable and downloadable online under suitable creative commons licensing (CC-BY ND 4.0 recommended)</li> <li>○ Develop and reference a system of categorising the quality of the data such as <a href="#">ISO 19157:2013</a>, noting this obligation should not apply in relation to a piece of natural hazard information that was created before the date on which these regulations come into force.</li> </ul> </li> </ul>

Question	Comments
	<ul style="list-style-type: none"> <li>• There needs to be definitions for key terms like <u>clear, concise, consistent, accurate and understandable</u> in the context of natural hazards data. This will influence what the standard is for data to be used and potentially subjected to legal challenges.</li> <li>• Standards are needed on how the data should be viewed consistently in maps/portals. We recommend developing a common schema, symbology, pop-up attributes and display scales.</li> <li>• Local authorities may need help with: <ul style="list-style-type: none"> <li>○ Recommendations of robust data curation processes</li> <li>○ Guidance on metadata standards</li> <li>○ Best practice on sharing data on open data portals and map portals</li> <li>○ Data licensing</li> <li>○ What to do when a hazard is considered possible in a location but there is no fit-for-purpose data to back that up.</li> </ul> </li> <li>• Consistency on how we classify hazards is required – e.g. high, medium and low – and clarification around category thresholds. Currently there isn't a consistent approach, as a result of how the data is developed. An example of good guidance is the liquefaction susceptibility Building Code approach, where guidance supports nationally consistent liquefaction susceptibility mapping at different levels, with clear robustness thresholds. For all other natural hazards, some councils currently use the high, medium and low hazard classification, but within that classification the thresholds between each category are different. Other councils may use five different hazard classifications from very low to very high/extreme.</li> </ul> <p>The council recommends developing a standard for the inclusion of some technical language to be used in all LIM reports. Particularly the use of Annual Exceedance Probability (AEP) over Annual Return Interval (ARI). For example, a 1% AEP should be used over a 1 in 100 yr ARI flood event, due to the misinterpretation ARI references cause.</p>
<b>Regulations for territorial authorities when providing natural hazard information in LIMs</b>	
<p><i>Limit on obligations on territorial authority (Regulation 6)</i></p> <p>6. Do you consider that the regulation provides sufficient clarity to territorial authorities?</p>	<p>We consider this regulation provides sufficient clarity for territorial authorities on the limits of their obligations.</p>
<p><i>Content of natural hazard section (Regulation 8)</i></p>	<p>We note that the changes introduced to the LGOIMA are intended to be an information disclosure tool. However, the legislation and the proposed regulations suggest that the TA must provide all natural hazard information, even when two datasets may show completely different views. TAs may have river</p>



Question	Comments
<p>7. Do you consider that the proposed headings are the right ones? Are there any missing?</p>	<p>flooding information that displays a more nuanced understanding of the hazard, and can be different from the regional level data for the same location. This could result in a LIM presenting contradicting information.</p> <p>Please see our recommendation in the clause-by-clause analysis for regulation 8.</p> <p>We suggest a few additional criteria/subjects need to be covered in the LIM:</p> <ul style="list-style-type: none"> <li>a. Link to Civil Defence – or any civil defence response plans for the community to help manage the hazard/impact</li> <li>b. Any information centred around a community adaptation plan that has been adopted for that community, so people are aware if something like managed retreat has been proposed for that community (only available on the community level, not property specific). For example: information gathered as part of the development of the Wharekawa Coast 2120 community adaptation plan in the Hauraki district and for the Thames-Coromandel Shoreline Management pathways.</li> <li>c. Flood risk infrastructure/residual risk section. This is essential to help tell the story of the hazard, but also how the hazard is managed</li> <li>d. Any known hazard mitigation work undertaken by the council that has resulted in the reduction of risk for that property should be highlighted – e.g. flood protection, evacuation plans, nature-based solutions, etc. This will typically be linked to consents for each development.</li> </ul> <p>With regards to noting if there is no known information for that hazard, it is also important to note that even though there may not any information, the property may still be susceptible to the hazard. We recommend including wording to note that the property may still be susceptible to the hazard.</p> <p>We suggest at the beginning of each section, there could be three tick boxes like the below:</p> <p>Is the property susceptible to river flooding:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> possibly</li> <li><input type="checkbox"/> unlikely</li> <li><input type="checkbox"/> unsure</li> </ul>

Question	Comments
<p><i>Minimum requirements in relation to a technical report (Regulation 9)</i></p> <p>8. Are these the right minimum details that councils should include in LIMs for each technical report?</p>	<p>The regulations are not clear on whether a TA should include all technical reports, even if some have been superseded. To address this, we suggest an amendment to regulation 8, to require the use of the most recent report. See further clause-by-clause analysis below.</p>
<p><i>Maps (Regulation 10)</i></p> <p>9. Does this regulation provide sufficient clarity for territorial authorities on how to share natural hazard maps in LIMs?</p>	<p>We note that the effectiveness of this regulation will depend on displaying the information consistently across the country. This requires guidance on symbology. We understand this is being looked at nationally, however, this work needs to be prioritised to ensure effective implementation of the proposed regulations.</p>
<p><i>Plain language summaries (Regulation 11)</i></p> <p>10. Should this requirement apply to all pieces of natural hazard information or only to technical reports?</p>	<p>This should apply to all datasets, whether mapped or in technical reports. If technical language is required, we suggest this falls in the layers' hazard metadata. Hyperlinks should also be provided to a definition of what that technical language means. Otherwise, there may be inconsistency between the LIM and data on any internet sites.</p> <p>As noted in our response to question 5, we advocate for the use of AEP over ARI. This is where plain language is then required to explain what a 1% AEP event actually represents.</p>
<p><i>District plan information (Regulation 12)</i></p> <p>11. Does this regulation sufficiently clarify for territorial authorities what district plan information related to natural hazards should be included in LIMs?</p>	<p>It should be clarified if certain district plan hazard mapping datasets relate back to certain regional council hazard datasets, especially if the TA has named/is displaying those datasets differently to how the regional council is displaying them. For example in the Waikato region, some of our TAs have taken the high, medium and low hazard information we have collaborated with the TA on to inform their district plan, and have altered the flood zone information to be called <i>high flood hazard zone</i> (for high hazard) and <i>flood management zone</i> (for medium and low).</p> <p>We request further amendments to regulation 12 in the clause-by-clause analysis table below.</p>
<p><i>Notices under the Building Act 2004 (Regulation 13)</i></p> <p>12. Does this regulation sufficiently clarify how territorial authorities should include information on Building Act notices related to natural hazards in LIMs?</p>	<p>This regulation clarifies what notices should be included, but reasoning behind why this notice is on the property title is essential. This could include linking the LIM information to the event information that resulted in the Building Act notice. This could also be linked to the hazard layer this represents, either at the TA level or regional council level. Providing reasoning/justification as to why a notice was placed on the property is essential to reduce uncertainty for the property buyer. Also stating what the consequences are of that notice is important at the local government level.</p> <p>To address our comments above, we have suggested changes to regulations 8 and 13 in our clause-by-clause analysis below.</p>

Question	Comments
	We suggest information provided under regulation 13 should be complemented by a link to the Natural Hazard Commissions portal, to provide buyers with relevant information and understanding if insurance claims have been paid out on the property/buildings.
<p><i>Natural hazard information provided by a regional council (Regulation 14)</i></p> <p>13. Does this regulation sufficiently clarify the responsibilities of territorial authorities and regional councils in the LIM system?</p>	We largely support the wording in regulation 14, but request changes in the clause-by-clause analysis below.
<b>Regulations for regional councils when sharing natural hazard information with territorial authorities</b>	
<p><i>Limit on obligations for regional councils (Regulation 15)</i></p> <p>14. Does this regulation sufficiently clarify the responsibilities of regional councils in the LIM system?</p>	Regulation 15 sufficiently clarifies the responsibilities of regional councils in the LIM system.
<p>Regional councils must ensure that the natural hazard information they provide meets the requirements (Regulation 16)</p> <p>15. Will this regulation be sufficient to ensure territorial authorities are able to share regional council information in LIMs in a way that complies with the LGOIMA and the regulations?</p>	We largely support the wording in regulation 16, however, this is framed by recommendations on regulations 8, 9, 11 and 16 in the clause-by-clause analysis below.

### Waikato Regional Council: clause by clause analysis

Regulation	Position: support/oppose/request amendment	Explanation
8 – Content of natural hazards section	<p>1. Amend subclause 8(1) to add underlined text as follows:</p> <p>The natural hazard section of a land information memorandum must include the <u>most recent</u> natural hazard information about the land concerned under each of the following headings (...).</p> <p>2. Adding subclause 5 as follows:</p>	<p>1. The regulations are not clear on whether a TA should include all technical reports, even if some have been superseded. To address this, we suggest an amendment to regulation 8, to require the use of the most recent report.</p>

Regulation	Position: support/oppose/request amendment	Explanation
	<p><u>(5) For the purposes of subclause (1), when issuing a LIM, a territorial authority must note the source of the information and the scale (i.e. property, regional, etc.), and include a disclaimer highlighting any potential discrepancies between the two datasets.</u></p> <p>or</p> <p><u>(5) For the purposes of subclause (1), when issuing a LIM, a territorial authority must give preference to information closest to the property scale or the most up-to-date information.</u></p>	<p>2. As drafted, the regulations oblige TAs to include information about the site that might overlap. Regional and district level datasets may show different information for a site. Our first recommendation allows the TA to publish both datasets, whilst being clear about the scale and potential discrepancies. Our alternative recommendation directs the TA to prefer the most site-specific information, thus avoiding any confusion stemming from displaying two datasets.</p>
<p>9 – Minimum requirements in relation to technical report</p>	<p>Amend regulation 9 as to add underlined text and remove strikethrough text as follows:</p> <p><b>Minimum requirements in relation to technical report</b></p> <p>If information provided in the natural hazard section of a LIM is contained in a technical report, the LIM must include at least the following details in relation to the report:</p> <p>(a) the name of the person or entity that commissioned the report:</p> <p>(b) the purpose of the report:</p> <p>(c) the <del>scope</del> <u>scale</u> of the report (for example, whether the report relates to only 1 property, to 2 or more properties, or to a broader area or community):</p> <p>(d) where or how to access the report:</p> <p>(e) the title of the report:</p> <p>(f) the date of the report:</p> <p>(g) the name of the person or entity that prepared the report.</p> <p><u>(h) the timeframe used to develop any projections or model data</u></p> <p><u>(i) note if the report links to a particular dataset which is mapped on the LIM.</u></p> <p><u>(j) Add the limitations and disclaimers of the report or reference that section of the technical report.</u></p>	<p>We strongly recommend replacing <i>scope</i> with <i>scale</i>, as <i>scale</i> is better suited to describe technical elements of the hazard assessment. <i>Scope</i> is more likely to refer to the types of natural hazards being studied, the methodology used for the assessment and the scenarios covered in modelling of the data.</p> <p>The other suggested amendments relate to the following:</p> <ol style="list-style-type: none"> <li>1. Timeframe: it's beneficial for people reading a LIM report to understand the time scale or timeframe used to calculate any projections or model any data.</li> <li>2. A lot of reports would be supporting model information associated with the mapped data which is required to be included in the LIM.</li> <li>3. Adding the limitations and disclaimers of the report or reference that section of the technical report will give people a more nuanced appreciation of the information. Alternatively, we suggest developing and referencing a system of categorising the quality of the data based on <a href="#">ISO 19157:2013</a>.</li> </ol>

Regulation	Position: support/oppose/request amendment	Explanation
10 – LIM must include maps	Amend subclause 10(b) as follows:  (b) <del>a</del> links to <del>a</del> ny publicly available internet sites or online portals that provides access to <del>a</del> ny maps described in paragraph (a).	We note that there may be more than one online map.
12 – LIM must include information contained in district plan	<ol style="list-style-type: none"> <li>1. Delete subclause 12(1)(a)(ii)  Or  Modify to make its intent clear.</li> <li>2. Amend regulation 12(1)(b) as follows: (b) <del>a</del>links to <del>a</del>ny publicly available internet sites or online portals that provides access to <del>a</del>ny maps described in paragraph (a).</li> <li>3. Delete Subclause 2(a)</li> </ol>	<ol style="list-style-type: none"> <li>1. The council is unsure if this refers to zoning under the district plan. If that's the case, the general conditions of land use are already part of plan provisions, and specific conditions can also be included as part of a land use consent.  We consider the approach in regulation 12(1)(a)(ii) is too general and doesn't appear to have a clear connection to natural hazards.  Alternatively, we suggest rewording the subclause to provide a clearer link between any conditions attached to land use in the context of a plan or existing consents e.g. minimum floor levels or maximum cover of impermeable surfaces. This could be linked to hazards identified under regulation 8 that affect the land concerned.</li> <li>2. As in regulation 10, we note that there may be more than one online map.</li> <li>3. This provision may be technically impossible to implement. Some links may reference hazard themes or categories in which the specific information could be found, but it may not be just the specific information about the specific hazard. For example, it may be a link to a portal website with several data sets about volcanic and geothermal hazards in it, of which only one might be applicable to subclause (1)(b).</li> </ol>
13 – LIM must include information	Amend regulation 13 as follows:	Adding subclause (2) will help provide reasoning/justification as to why a notice was placed on the property, and is essential to reduce uncertainty for the property buyer.

Regulation	Position: support/oppose/request amendment	Explanation
relating to notices under Building Act 2004	<p><b>13 LIM must include information relating to notices under Building Act 2004</b></p> <p>(1) The natural hazard information contained in a LIM must—</p> <ul style="list-style-type: none"> <li>(a) include any notification provided under section 73 of the Building Act 2004 that relates to a building consent that relates to the land concerned; and</li> <li>(b) note whether a post-event assessment under section 133BQ of the Building Act 2004 has been prepared in relation to the land concerned or a building on the land concerned; and</li> <li>(c) note whether a sign or notice under section 133BT of the Building Act 2004 that relates to a building on the land concerned has been placed on or near the building; and</li> <li>(d) if a sign or notice under section 133BT of the Building Act 2004 that relates to a building on the land concerned has been placed on or near the building, note whether a subsequent decision has been made under that Act to remove the sign or notice.</li> </ul> <p>(2) <u>Natural hazard information included in a LIM under subclause (1) should be accompanied by information about the natural hazard event that resulted in a notice issued under the Building Act.</u></p>	
14 – Natural hazards information provided by regional council	<p>Amend subclauses (2)(a) and 2(c) as follows:</p> <p>The territorial authority must ensure that— (...)</p> <ul style="list-style-type: none"> <li>(a) it does not alter <del>the wording of</del> the information, <u>including metadata</u>, provided by the regional council; and</li> <li>(...)</li> <li>(c) the LIM includes <del>a-links to the any</del> regional council’s online portals for natural hazard mapping, if the council has such <del>a</del>-portals.</li> </ul>	<p>Hazards information may be more than just words. It could be any form of data, and it should not be modified by the territorial authority unless permission is expressly given by the regional council beforehand. This clause needs to be reworded to provide for this.</p> <p>We request the amendment of subclause 2(c) as there may be more than one applicable link or portal.</p>
16 – How regional council must	Amend regulation 16 to add subclause (3) as follows:	This will prevent having to retroactively get information from reports produced before the commencement date of the regulation. This

Regulation	Position: support/oppose/request amendment	Explanation
provide natural hazard information	<u>(3) the requirements under subclause (2) do not apply in relation to a report or piece of natural hazard information that was created before the commencement date of these regulations.</u>	would align regulation 16 with the application clause in regulation 5.