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Via email: LevyFeedback@fireandemergency.nz

Submission on the Fire and Emergency levy for 2026-2029

Tēnā koutou

Age Concern New Zealand and our Member Organisations welcome the opportunity to submit comments on the Fire and Emergency levy consultation for 2026-2029.

Age Concern is a trusted charity working in local communities throughout Aotearoa to support older people, their friends and whānau. Our values – Dignity, Wellbeing, Equity, and Respect for older people are our guiding lights and underpin everything we do. We aim to ensure older New Zealanders get the best advice and support no matter where they live in Aotearoa. With a network of 30 local Age Concerns operating in 40 locations, and a national office based in Wellington, we are the place to go for services and information about getting older.

We are proud of our heritage in standing up for the rights of older New Zealanders for more than 75 years. As an organisation, our focus is on contributing to the overall wellbeing of older New Zealanders. We work to prevent the abuse and neglect of older adults; improve their health and wellbeing; end loneliness and social isolation; and advocate for older people's rights.

Submission

The over 65 population is growing across all ethnicities with Asian, Māori and Pacific older populations growing at significant rates. Older women living alone are another group that is rapidly increasing. New Zealanders in general are living longer; and within a decade, it is estimated there will be 1.2 million people aged 65+, over a fifth of the population. This demographic needs to be taken into consideration in portioning any extra costs of an increased Fire and Emergency levy.

Age Concern New Zealand supports a fair and equitable levy system. We understand that the Fire and Emergency levy must be stable, universal, equitable, predictable, and flexible.

However, after reviewing the consultation document it is our view that the preferred proposed levy increases will disproportionately impact older New Zealanders. This is because older New Zealanders not only make up a large proportion of the overall population,

but they also are likely to be on fixed incomes. Currently 60% of older singles and 40% of older couples live on fixed incomes (with little or no income other than NZ Superannuation).

As such Age Concern submits that the proposed levy increases aimed at private car insurance and residential property could be reduced to ensure equity. It is submitted that the proposed flat levy rate of \$40.12 for each insured motor vehicle, including those over 3.5 tonnes (commercial vehicles) is not equitable and will increase costs for those who can least afford it. This change will disproportionately impact people on fixed incomes, and those who opt for 3rd party car insurance.

Maintaining a higher levy on commercial vehicles, even though they represent a lesser number of insured vehicles, would be a more equitable and fairer approach to spreading the increased cost burden.

In addition, Age Concern recommends that when setting levies Fire and Emergency consider that although many older New Zealanders own their own home, the number of older renters is currently 20%. This is expected to increase substantially to 40% of over 65s with the percentage for Māori and Pacific older people renting even now sitting at 35% of Māori kaumātua and 46% of Pacific matua.

While the consultation document sets out the assumption that personal property insurance levels will remain the same, we are also hearing of more older people that are no longer able to afford the increases that they are seeing with their current insurance and are cancelling long held policies. There are also concerns around some residential communities being identified as higher risk for natural disasters and the impact that this could have on future insurability. All these external factors could impact the overall number of personal property insurance policies that can be levied.

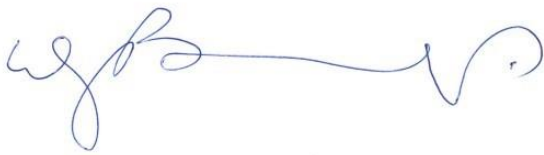
Our key recommendations:

1. Age Concern opposes a flat levy rate for each insured motor vehicle as this will increase direct costs per year on older people who own a car and disproportionately affect those on fixed incomes, or those who have only held 3rd party insurance. This change could also flow onto increased costs for those who access car services such as Driving Miss Daisy, which is a companion driving service for older people.
2. Instead, Age Concern recommends imposing a more progressive levy, similar to the current system where commercial vehicles are levied at a higher rate.
3. Age Concern supports the preferred option on personal property insurance which entails no increase. This is because any increase in levy payments on personal contents insurance would affect older renters in New Zealand.
4. By increasing the levy on residential and non-residential property, much of the new extra burden could be removed from individuals on fixed incomes. Age Concern notes that on page 37 of the consultation document, non-residential vegetation and

structural residential and non-residential fire response costs far exceed the projected vehicle response costs. The levy should reflect the costs of these projected fire responses.

Thank you again for the opportunity to provide our submission on the *Fire and Emergency levy for 2026-2029*, we are very interested in seeing the levy burden being shared equitably according to assets and resources.

Nāku noa, nā,



Karen Billings-Jensen
Chief Executive
Age Concern New Zealand