



Minister of Defence

For action by

30 January 2026

BRIEFING: NZDF HAZARDOUS SUBSTANCES AUDIT

PURPOSE This submission presents you with a summary of the key findings from the audit into the New Zealand Defence Force's (NZDF) management of class 2-9 hazardous substances¹.

Recommended referrals

Associate Minister of Defence

For information by

30 January 2026

Minister for the Environment

For information by

30 January 2026

Agency contact

NAME	POSITION, ORGANISATION	PHONE
s9(2)(g)(i)	Director Defence Assessment, Ministry of Defence	s9(2)(a)

Agency consultation

The following agencies were involved:

- New Zealand Defence Force (NZDF)
- Ministry for the Environment

Key points

- This briefing provides you with:
 - A summary of the audit findings from the North Island sites, and an update on the NZDF's progress of addressing the South Island findings (Refer to Annex A); and
 - A summary of the key themes arising from the audits of all sites (Refer to Annex B).
- These audits were conducted as required by section 3(6) of the Hazardous Substances and New Organisms (HSNO) Act 1996 and were part of the Defence Audit and Assessment Work Programme approved by you in April 2024.
- Since these audits required specialist knowledge and expertise, the Ministry engaged an external provider, Responsible Care New Zealand (RCNZ).
- Overall, RCNZ acknowledged that *"compliance with the NZDF's hazardous substances code of practice was generally high across all South Island sites and is comparable with industry best practice. However, the standard of compliance achieved by the South Island sites became increasingly difficult to sustain in the more complex and demanding North Island sites."*
- The audits identified many areas across the NZDF sites that required attention, categorised into higher and lower priority recommendations.

¹ Class 2-9 covers all hazardous substances except ammunition and explosives

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- The NZDF have confirmed that all higher priority recommendations have been addressed or are under action to resolve, across all sites. They are also in the process of addressing the lower priority items, with approximately 80% of South Island recommendations, and 75% of North Island recommendations being addressed as of November 2025.
- Further to the site audit findings and recommendations, RCNZ also provided key system-wide audit themes and associated recommendations. The NZDF has set up a work programme to deal with the most urgent ones and are engaging across the different business units to review and understand how to address the others.
- Progress and/or completion reports for the North Island sites are due to the Ministry's Defence Assessment Team by 28 February 2026. An update on the progress of remediation of the key themes is due to the Defence Assessment Team by 30 June 2026. You will be informed of progress shortly after each update via a Defence Weekly Report item.
- The findings and recommendations from this audit are intended for internal purposes. It is not intended that the findings will be made publicly available, unless required to do so.

s9(2)(k)

cc:

ANTON YOUNGMAN
Deputy Secretary
Strategy Management and Assessment

T DAVIES
Air Marshal
Chief of Defence Force

Date: 4/12/25

Recommendations

It is recommended that you:

1. **Note** that an audit of NZDF's controls of class 2-9 hazardous substances has been conducted across all NZDF sites, in accordance with s3(6) of the HSNO Act 1996. **Noted**
2. **Note** that the NZDF have confirmed they have already addressed the higher priority recommendations, or are under action to resolve, across all sites. **Noted**
3. **Note** that the NZDF is in the process of addressing the lower priority recommendations for all sites. **Noted**
4. **Note** the NZDF will provide the Ministry's Defence Assessment Team with a progress and/or completion report by 28 February 2026 for the remaining North Island recommendations; and by 30 June 2026 for an update of remediation of the key themes. You will be informed of progress shortly after each update via a Weekly Report item. **Noted**
5. **Refer** this briefing to the Associate Minister of Defence, who has the delegated responsibility for Defence Estate. **Yes / No**
6. **Refer** this briefing to the Minister for the Environment as required by s3(6) of the HSNO Act 1996. **Yes / No**

HON JUDITH COLLINS KC
Minister of Defence

Date:

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Annex A – NZDF site-specific audit findings and recommendations

- RCNZ completed the audit of South Island sites in 2024, and the findings and recommendations of these audits were provided to you in August 2024. The audits of North Island sites began in late 2024 and concluded in mid-2025.
- RCNZ conducted comprehensive site audits by systematically evaluating the storage, usage, handling, and disposal of Class 2-9 hazardous substances under the management of the NZDF. The auditors spent approximately one week auditing each site (six North Island sites and four South Island sites).
- The detailed audit reports identified a number of recommendations across all sites that would address relatively minor issues, such as replacing faded hazardous signage that are illegible or out of date, through to more significant issues, such as managing chlorine gas. Some of these recommendations were site specific, while others were systemic, relating to the same or similar findings identified across multiple sites.
- RCNZ categorised the recommendations for each site from higher priority to lower priority recommendations. Each site had between three and six higher priority recommendations to address, which the NZDF have confirmed have all been actioned, or are under action to resolve.
- In February 2025, you were provided with an update on NZDF's progress in addressing the South Island recommendations, where you were advised that "good progress has been made by the NZDF to address the recommendations" and that the Woodbourne recommendations had all been completed. Since then, good progress continues to be made with approximately 80% of South Island lower priority recommendations being completed as of November 2025.
- The NZDF have already started addressing the lower priority North Island recommendations, with approximately 75% being completed as of November 2025.
- The observations and recommendations from the RCNZ audits were shared and tested with the NZDF's Defence Logistics Command, who provided the following management response:

"The NZDF have reviewed the observations and recommendations identified. The North and South Island observations and recommendations have been provided to the various Officers in Charge of Defence Areas/Units and those other portfolios who have responsibility for specific elements identified in the audit report."

Next steps

- The Ministry's Defence Assessment Team will check in with the NZDF in February 2026 to ensure all North Island site audit findings and recommendations are addressed. An update on progress will be provided to you via the Defence Weekly Report in early 2026.

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Annex B – Key audit findings themes across all NZDF sites

- At the conclusion of the site audits and submitting those reports, RCNZ also provided an overall report detailing the key audit finding's themes and recommendations across all sites, which included:
 - improvements to water treatment procedures and equipment particularly in relation to the use of liquified chlorine gas (RCNZ identified this as the highest priority area to address);
 - improvements to chemical exposure monitoring by introducing more frequent health assessments for NZDF personnel exposed to these hazardous substances;
 - reviewing oversight of hazardous substances managed by contractors, including ensuring they comply with NZDF guidelines;
 - reviewing Emergency Response Plans (ERPs) to ensure they are consistent, relevant, maintained and integrated across NZDF sites, and take action to strengthen emergency preparedness, including ensuring emergency services have access to ERPs;
 - ensuring consistency of external certification advice and solutions, ensuring that NZDF Compliance Officer oversight of external certification occurs; and
 - conducting a co-ordinated review of the infrastructure supporting hazardous substance storage and use, particularly ensuring they have verified fire ratings, adequate electrical systems, and appropriate identification and management of hazardous atmosphere zones.
- The RCNZ summary report acknowledges that: *“Defence and civilian staff encountered throughout the audits are clearly doing their best, despite a shortage of knowledgeable supervisors and operators, exacerbated by the need to maintain exacting operational standards and performance without the required support. All involved are to be commended for their professionalism and commitment”.*
- RCNZ recommended that NZDF review roles to ensure there are defined responsibilities and accountabilities, and upskill Prime Delegates, NZDF Compliance Officers, and major contractors. RCNZ also suggested that the scope of the Prime Delegate role is too complex to remain a role that is secondary to the individual's primary duties. RCNZ recommends that Prime Delegates are transitioned to a full-time embedded role to ensure effective hazardous substances management.
- In response to the key themes, the NZDF provided the following management response:

“The overall audit report identified significant safety concerns related to the use and management of liquified chlorine gas in many of the NZDF water treatment plants. This matter has been investigated, an upgrade program initiated, and the concerns have been satisfactorily addressed.

Other important overarching recommendations were made relating to:

Recommendation	Response
<i>Improvements required to personnel chemical exposure monitoring programme</i>	<i>This matter has been referred to the Chief People Officer to review current health monitoring policy settings for Members of the Armed Forces and the NZDF Civil Staff.</i>
<i>Review oversight of hazardous substances managed by contractors</i>	<i>The Office of Hazardous Substance Assurance (OHSA) will raise the requirement for greater contractor compliance through seeking amendments to contract arrangements as they become due and with supported oversight being exercised by NZDF contract managers. This will remain an enduring work in progress due to the</i>

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	<i>considerable array of contractors who undertake work on and in NZDF infrastructure.</i>
<i>Review of ERPs</i>	<i>The OHSA will strengthen the certification and enforcement policy requirements for ERPs. This will be supported by training for Commanders and Managers who operate hazard facilities to ensure they have the skills necessary to meet compliance requirements. It is anticipated this will be completed by June 2026.</i>
<i>Provide greater management oversight of External Compliance Certifiers</i>	<i>The OHSA and Defence Estate and Infrastructure (DEI) will continue to work together on improving the scheduling of certification planning to ensure there are sufficient NZDF compliance officers available when required to provide the necessary management oversight of external certifiers.</i>
<i>Review roles, upskill Prime Delegates and Compliance Officers, and transition Prime Delegates to full time hazardous substances roles</i>	<p><i>The review of hazardous substance roles has commenced and will be supported by updated policy and procedures. This is scheduled for completion by June 2026.</i></p> <p><i>Professional development of OHSA Compliance Officers commenced in June 2025 with personnel undertaking the Massey University post graduate studies in Hazardous Substances Compliance Certification. Personnel will complete their studies in mid-June 2026.</i></p> <p><i>The NZDF Compliance Officers training package is currently being assessed by the Defence College to review training and qualification outcomes to ensure that the courses remain appropriate This work will be completed by June 2026.</i></p> <p><i>The recommendation to establish five new dedicated positions as Hazardous Substances Prime Delegates will not be implemented due to funding constraints. Notwithstanding this, the OHSA will work with the NZDF portfolios to ensure that the existing Prime Delegate part time roles correctly reflect the expected duties. This work will be completed by June 2026.</i></p>
<i>Review hazardous substance storage infrastructure fire ratings, electrical systems, and hazardous atmosphere zones verification requirements</i>	<i>The OHSA and DEI have an extant verification programme in place and are satisfied that the existing policies and practices meets industry standards and any NZDF bespoke military requirements. No changes to the existing verification processes will be undertaken at this time."</i>

- RCNZ's overall themed findings and recommendations are based on their site audits, and they did not formally engage with the senior functional leaders. This meant that RCNZ has not considered the broader context, strategic prioritisation, and governance that the NZDF senior leadership team provides to the oversight and regulation of hazardous substances.

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- The Defence Assessment Team will ensure that the NZDF senior functional leaders are included in the next Hazardous Substance audits arranged by the Ministry where system-wide audit findings and associated recommendations are made by the auditor.

Next steps

- The Ministry's Defence Assessment Team will check in with the NZDF in July 2026 to obtain a progress update on how the NZDF is addressing the key themes and recommendations across all NZDF sites. An update on progress will be provided to you via the Defence Weekly Report in mid-2026.

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