

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of **PROPOSED CHANGE 1** to the **GREATER WELLINGTON REGIONAL POLICY STATEMENT**

**OUTLINE OF LEGAL SUBMISSIONS OF COUNSEL FOR WELLINGTON
FISH AND GAME COUNCIL**

HEARING STREAM 6 – INDIGENOUS ECOSYSTEMS

1. INTRODUCTION

1.1 The Wellington Fish and Game Council (“Fish and Game”) supports the amendments proposed to the Indigenous Ecosystems provisions in the section 42A report, subject to further amendments to address issues arising from Fish and Game’s submission on those provisions.

1.2 The further amendments comprise an amendment to Method 53 and an amendment to the definition of restoration.

Evidence

1.3 Fish and Game has filed evidence from Lily Campbell (Senior Planner at Kāhu Environmental Limited). At paragraph 21 of her evidence, Ms Campbell refers to the evidence of Ms Ami Coughlan (Resource Officer at Fish and Game) that was filed for HS5. Given that the Panel has previously read that evidence, it has not been refiled with a different title on it.

1.4 The proposed amendments are addressed below.

2. **AMENDMENTS TO METHOD 53**

2.1 The amendments to Method 43 recommended by the reporting officer is:

Method 53: ***Support mana whenua and community restoration initiatives for the coastal environment, rivers, lakes and wetlands indigenous ecosystems***

Provide practical support for mana whenua and community restoration initiatives for ~~the coastal environment, rivers, lakes and wetlands~~ indigenous ecosystems, with a focus on achieving the targets and priorities identified by Methods ~~IE.23, CC.4 and CC.76.~~

2.2 The amendments sought by Fish and Game to Method 53, with the reporting officer's recommended amendments made, are:

Method 53: ***Support mana whenua and community restoration initiatives for indigenous the restoration of terrestrial and aquatic ecosystems***

Provide practical support for mana whenua and community restoration initiatives for ~~the restoration of terrestrial and aquatic~~ indigenous ecosystems, ~~with a focus on~~ which includes support in achieving the targets and priorities identified by Methods IE.3, CC.4 and CC.6.

2.3 Ms Campbell addresses the reasons for the amendments sought in paragraphs 27 to 32 of her evidence. In summary, the key reasons are that:

- (a) the amendments proposed by the reporting officer narrow the application of Method 53 so that it only relates to indigenous ecosystems;
- (b) Method 53 does not apply just to indigenous ecosystems or the objectives and policies relating to indigenous ecosystems – it also applies to Objective 12 in the RPS, which is about managing freshwater to give effect to Te Mana o te Wai; and
- (c) it is appropriate for Method 53 to apply to indigenous and non-indigenous ecosystems.

3. **AMENDMENTS TO THE DEFINITION OF RESTORATION**

3.1 Fish and Game also seek amendments to the definition of Restoration. The reasons for those amendments are addressed in paragraphs 34 to 36 of Ms Campbell's evidence. Basically, Fish and Game seek to broaden the definition so

that it is not limited to indigenous biodiversity, but applies to all habitats and ecosystems.

DATED at **AUCKLAND** on 30 January 2024

A handwritten signature in blue ink, consisting of several overlapping loops and a final stroke extending to the right.

C D H Malone

Counsel for Wellington Fish and Game Council