

NRP PC1 Speaking Notes for Hearing Stream Two

Wellington Fish and Game Council continues to support the objectives, policies and rules which were supported in the draft. Changes to these to extend the timeframes or make targets less stringent are not supported, as they are incompatible with the stated goal of achieving wai ora by 2100.

TAS for estuaries, wetlands, groundwater.

In the S42a report, the author states there is not enough research, benefits / needs not established by the submitter to set Target Attribute States (TAS) for wetlands, that there is not a key risk area necessitating TAS, and that existing NRP and NES-F provisions for physical wetland disturbance address key threats to them.

However, the Greater Wellington website¹ acknowledges that only around 3% of wetlands remain in the region, whereas in 1999 a report showed around 10% of wetlands remained. This indicates that there are indeed ongoing risks of wetland loss, and that wetlands are an incredibly threatened biome. If the current regional plans indeed adequately addressed the key threats to wetlands, we would see an increase in wetland type, abundance, and distribution, however it seems unlikely that wetlands are able to be protected adequately, let alone restored. This may be due to monitoring and compliance, and in this case basic targets (such as type, abundance, and distribution of wetlands) could clarify which areas are to be monitored, and how compliance could best be achieved.

P45

Wellington Fish and Game appreciate and support retaining trout habitat protections as per national legislation requirements.

Objectives WH. O1 and P.O1

The suggested amendments of rejecting interim timeframes, including social and economic use benefits, and providing for primary production all have potential to work against the stated long term goal setting for environmental outcomes for both whitua. It is understood that these goals are long term, and will not be achieved by 2040, however without a stepwise framework of goals, monitoring,

and reporting, it will be difficult to ascertain whether the actions taken are effective, if they are less than effective, or if they need to be relaxed. With the later stated goals in WH.O10 and P.O7 being that of 'no further degradation' already holding that line, there is real scope for WH.O1 and P.O1 to be aspirational, and to establish logical and pragmatic guidelines to make progress towards ecosystem health, wai ora. Further concerns are raised when targets throughout the Plan Change are made less stringent (*E. coli*, metals, sediment). While pragmatism and achievability are indeed vital, so is progression towards the end goal of a wonderful and resilient environment that supports us and all other life, and enhances our physical, mental, spiritual, and emotional needs – including that of pride in place, and sense of self as part of the natural world.

Objective 19

In this hearing, Objective 19 has been replaced by WH. O3 and P. O3. In our original submission, Wellington Fish and Game were looking for restoration of a degraded aquatic ecosystem and mahinga kai values and maintenance of a healthy one (as discussed in the NPS-FM 2020), rather than merely encouraged, as per the wording in PC1. The concern remains that WH.O3 and P.O3 as replacements for Objective 19 in these whaitua do not seem progressive enough to fulfil stated wai ora narrative objectives.

Objectives WH.O2 and P.O2

Wellington Fish and Game supports the addition of the reference to natural form and character, ecosystem health, and of fishing benefits to WH.O2 and P.O2.

Our original submission sought reference to introduced species to be added to clause d. The S42A author considered it preferable to recognise the activity of fishing in this environmental outcome objective, as this is the value identified through the values identification work completed during the WIP phase.

However, it was an embedded reference to habitat and species value sought in the initial submission. While trout and salmon are the key species under national legislation, waterfowl and game birds also rely on freshwater, particularly wetlands, and a clause which allows for robust communities which involve these species in the appropriate abundances and places could strengthen access to food sources as well as exposure to a thriving biodiverse ecosystem.

It should also be pointed out that food gathering may not be limited to fishing, and can include harvesting of game birds and waterfowl, among other sources.

Objective WH.03

The s42A report recommended rejecting our submission request to add valued introduced species into clause c of this objective, stating that none of the trout habitat locations identified in the Schedule I or mapped in the NRP include any coastal waters, only rivers and streams, and so is unclear why an amendment to these coastal objectives to reference introduced species would be necessary.

However, game birds and waterfowl utilise coastal wetlands, and trout are a highly mobile species with individuals often moving into lowland river or estuarine waters during an annual semi-migratory cycle, and some individuals becoming 'sea run' – moving out to sea then returning to freshwater later in life. Alongside this, and out of direct focus, is the importance of coastal ecosystems to our native freshwater species, many of which are diadromous, to a thriving aquatic biodiversity which can include trout and salmon.

The new clause h. requires that fish and benthic invertebrate communities are resilient and their structure, composition and diversity are maintained, that there is no increase in the frequency of nuisance macroalgal blooms, and that phytoplankton levels are maintained and monitored in applicable areas of point source discharges and locations that experience riverine mouth closures with limited water mixing.

As mentioned above, while it is imperative that degradation is halted, these clauses seek no improvement towards aquatic ecosystem health, and will not progress the coastal waters towards health.

Objectives WH.04 and P.04.

The report rejects suggestions that Fish and Game should be involved in management plans and strategy creation as the statutory managers of sports fish and game birds, as 'annual reports produced are "expected" to be made available to view on the Council's website and updated regularly.'

However, while reports provide information, the described process is one of one-way communication, not collaboration with statutory managers of specific fields such as Fish and Game.

Objectives WH.O10 and P.O7

I understand that this objective is designed to reflect the Councils initial goal to halt environmental decline in the first instance. I support the intention of this, as an interim step and a progress report timeframe. I am concerned that, aligned with the language in other objectives, the overall perspective appears to be that of a 'holding pattern' right the way through to 2040. For this reason, relaxing stringency of targets suggested in the draft NRP PC1 may accidentally enforce this narrative of preventing degradation but not encouraging restoration, which will not achieve the needed steps towards ecosystem health.