
Submission on the Wellington Regional Policy Statement Proposed Plan Change 1

INTRODUCTION

Wellington Fish and Game Council

1. Wellington Fish and Game Council (WFGC) submits on Proposed Change 1 to the Regional Policy Statement (RPS) for the Greater Wellington Region (GWR). WFGC confirms that it wishes to exercise its right to be heard in relation to this submission.
2. WFGC is the statutory body established under the Conservation Act 1987 responsible for the management of sports fish and gamebird resources in the Wellington Fish and Game region. Several of the gamebird species under WFGC's management are indigenous to New Zealand, and so WFGC shares a particular interest in the maintenance of New Zealand's indigenous biodiversity alongside the interests of mana whenua and other New Zealanders.
3. WFGC's statutory management functions include the maintenance and enhancement of the habitat of sports fish and game – the rivers, lakes, streams and wetlands within which sports fish, gamebirds, and many indigenous taonga species thrive. WFGC is tasked by statute to advocate for protection and restoration of these habitats and works with Greater Wellington Regional Council (GWRC), mana whenua and community groups on habitat protection and restoration throughout the GWR.
4. In discharging its statutory responsibilities, WFGC represents the interests of over 8000 licence holders (sports fish anglers and game bird hunters) in the region. These recreational pursuits are part of New Zealand's cultural heritage and are woven into the fabric of our society and ethos.
5. Many of these licence holders are also rate payers and WFGC expects that their interests and the interests of all ratepayers in the region will be fairly represented in the RPS and into the future.

Summary of Submission

WFGC welcomes the stated focus of Proposed Change 1 to the RPS to “start the implementation of the National Policy Statement for Freshwater Management 2020” (NPS-FM). WFGC strongly supports the NPS-FM and its central recognition that protecting the health of freshwater protects the health and well-being of the wider environment. The protection of GWR's rivers, lakes, streams, and wetlands is essential to WFGC's mission, and WFGC welcomes the opportunity to work with GWRC, mana whenua and the wider community to achieve the NPF-FM's objectives.

WFGC's detailed submissions on Proposed Change 1 are set out in the table below. In summary, WFGC broadly supports many of the proposed changes. However, it recommends a number of

amendments to address several central concerns and to better give effect to the requirements of the NPS-FM.

Freshwater Action Plans deferred until December 2026

WFGC is disappointed that Proposed Change 1 fails to give ‘voice’ to certain primary goals of the NPS-FM, which are urgently required to avoid adverse effects on the environment. These include:

- The identification of long-term visions for freshwater (Part 3.3); and
- The implementation of the National Objectives Framework (NOF), including: the identification of Freshwater Management Units (Part 3.8); indications on how limits on resource use will be ascertained to achieve target attribute states (Part 3.12); and how limit settings for appropriate instream concentrations and exceedance criteria for dissolved inorganic nitrogen and dissolved reactive phosphorus (Part 3.13) and environmental flows and limits will be reached (Part 3.16).

Proposed Plan Change 1 defers these central aspects of the NPS-FM to Freshwater Action Plans to be prepared by December 2026. WFGC considers that these elements of NPS-FM must be implemented as a matter of priority, in partnership with mana whenua and stakeholders, and in consultation with landowners and the community.

Inadequate protection for habitat of trout and salmon

The protection and restoration of freshwater habitat is essential to the maintenance of biodiversity and the functioning of healthy ecosystems. Without adequate healthy habitat, freshwater species, and their corresponding ecosystems, cannot thrive. The protection and restoration of habitat is often a crucial first step to the restoration of ecosystem health of freshwater.

The value of habitat is expressly recognised in Policies 9 and 10 of the NPS-FM, which provide:

Policy 9: The habitats of indigenous freshwater species are protected.

Policy 10: The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.

The specific protection of the habitat of trout and salmon in Policy 10 of the NPS-FM flows from the corresponding protection in s 7(h) of the RMA. It is reflected also in the attributes of ecosystem health in Appendix 1A of the NPS-FM, and in the identification of fishing as a value to be considered in Appendix 1B.5 of the NPS-FM.

The legislative protection afforded to the habitat of trout and salmon recognises both:

- The ***significant environmental value of these habitats***, including for indigenous biodiversity and taonga species. Protecting habitat for salmonids acts as an umbrella for the many indigenous freshwater species which coexist with trout and salmon at micro and macro habitat levels. The requirement of salmonids for plentiful cool, clean waterways with a full range of natural river forms, flows, and functions, ensures all species in that waterway have extra habitat protections as well. The still shaded pools of a good trout stream are also perfect for tuna, for example, and the two species are often found together. For this reason, trout are included in the Fish Index of Biotic Integrity as ‘honorary’ natives (Joy, [link](#)). Further, as they are very sensitive to habitat degradation, they are a useful indicator of

deleterious land use change impacts on the freshwater environment (Science and Technical Advisory Group meeting minutes, 2019).

- The longstanding ***recreational, cultural and economic value of sports fishing***. Sports fishing is part of the culture and ethos of many New Zealanders, and sports fishing tourism is a lucrative contributor to the New Zealand economy.

WFGC is conscious that there is an increasing perception that trout and salmon inherently conflict with indigenous freshwater and taonga species. That conflict is generally more perceived than real. It is important, therefore, that any supposed conflict between Policies 9 and 10 of the NPS-FM are resolved through accurate scientific information, rather than values-based reactions. WFGC welcomes the opportunity to work constructively with GWRC and mana whenua on this issue.

Emphasis on protection of indigenous biodiversity at the expense of other values

WFGC recognises the special character and value of New Zealand's indigenous biodiversity and the need for measures within the RPS to meet the objectives of Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020.

However, WFGC is concerned that the focus on indigenous species, habitats, and ecosystems throughout Proposed Change 1, at the expense of other significant habitat values, fails to give proper effect to the NPS-FM.

It further risks reducing protection for other valued species, habitats, and ecosystems to the extent that an adverse effect on the environment is likely. Even ecosystems that may not be considered to be "indigenous dominant", can play a significant role in the restoration of indigenous biodiversity. They are also important for the maintenance of valued non-indigenous species, such as trout, salmon, and gamebirds. It is important that, in seeking to give effect to the NPS-FM and Te Mana o te Taiao, Proposed Change 1 does not in fact institute a step backwards for the protection of these valuable habitats. It is essential that the RPS explicitly recognizes valued non-indigenous species, habitats, and ecosystems alongside indigenous ecosystems.

Inadequate articulation of Te Mana o te Wai

WFGC strongly supports the concept of Te Mana o te Wai, which lies at the heart of the NPS-FM. WFGC likewise strongly supports the insertion of Te Mana o te Wai into the RPS, and the primacy it gives to the health and mauri of the waterbody itself.

WFGC is concerned, however, that as drafted, the proposed Objective 12 falls short of what is required under the NPS-FM to give effect to Te Mana o te Wai in the regional context. WFGC recommends that Objective 12 be replaced with a single, integrated, and succinct expression of how Te Mana o Te Wai applies to water bodies and freshwater ecosystems in the GWR.

In developing that objective, WFGC asks for the RPS to give equal effect to the requirement of the NPS-FM to consult and engage with communities as well as tangata whenua, to enable a democratic vision and management of matters of importance to the whole community. Consistent with the 6 principles that are encompassed by Te Mana o te Wai, all New Zealanders have a responsibility for the care and management of freshwater. As (Hughey, Kerr & Cullen, 2007) have noted that, "the

general public share the same concerns about the state of water, its management, and pressures on the resource” as those expressed by mana whenua. Those concerns are particularly acute for WFGC.

SUBMISSION FORM

Provision (i.e., issue, objective, policy, method, definition)	Support/Oppose	Decision Sought	Reasons
Overarching resource management issues for the Wellington Region (pp. 4)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
Objective A (pp. 5)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
3.1A.2 (pp. 10)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
3.1A.3 (pp. 10)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
3.1A.5 (pp. 10)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
Table 1A (pp. 11 - 24)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
Objective 12 (pp 31, 33 and 198)	Support once amended	Replace with a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the Greater Wellington Region.	<p>WFGC strongly supports all six principles of Te Mana o te Wai and their inclusion in the GW RPS. WFGC also strongly supports the prioritisation of interests and outcomes as set out in accordance with the objective in Part 2.1 of the NPS-FM.</p> <p>The concept of Te Mana o te Wai forms the fundamental underpinning of the NPS-FM. In accordance with Part 3.2(1) of the NPS-FM GWRC must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.</p> <p>WFGC is concerned that, as drafted, Objective 12 falls short of what is required</p>

			<p>under the NPS-FM. It fails to articulate a clear objective as to what the application of Te Mana o te Wai means in the GWR and to give the overarching guidance expected from an RPS.</p> <p>WGC welcomes the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa. Those Statements, along with the view of the community and other stakeholders, are vital to a proper understanding and implementation of Te Mana o te Wai. However, the statement on p. 31 that these Statements “form part of [Objective 12]” creates significant potential for confusion between the Objectives and Policies outlined in the iwi Statements and those contained in the RPS itself. This is particularly the case as elements of the iwi Statements go beyond the scope of GWRC’s functions.</p> <p>WFGC recommends significant reconsideration of the current approach to Objective 12 with a view to the development of a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the GWR.</p>
Policy 12 (pp. 33 and 110)	Support	Clarification of paragraph (b): “achieve the long-term visions for freshwater;”.	<p>Strongly support the proposed changes to Policy 12 to give effect to the NPS-FM.</p> <p>However, it is disappointing that Proposed Change 1 does not incorporate a long-term vision for freshwater as set out in Section 3.3 of the NPS-FM. In the absence of a clear long-</p>

			term vision in the RPS it is not clear how paragraph (b) of the proposed changes to Policy 12 will operate.
Policy 40 (pp.36 & 139)	Support once amended	<p>Insert new paragraph (fa) to read:</p> <p><u>“(fa) avoiding the loss of river extent and values;”</u></p> <p>Insert new paragraph (ha) to read:</p> <p><u>“(ha) protecting the habitats of indigenous freshwater species, trout and salmon;”</u></p> <p>Insert new paragraph (ma) to read:</p> <p><u>“ensuring that there is no further loss of natural inland wetlands and their values are protected;”</u></p>	<p>WFGC supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM.</p> <p>The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.</p>
Policy 18 (pp. 37, 93 and 115)	Support once amended	<p>Insert new paragraph (ea) to read:</p> <p><u>“(ea) ensuring that there is no further loss of natural inland wetlands and their values are protected;”</u></p> <p>Amend paragraph (g) to read:</p> <p>“(g) protecting the habitats of indigenous freshwater species <u>and the habitats of trout and salmon insofar as this is consistent with the protection of the habitats of indigenous freshwater species are protected,,</u>”</p>	<p>Strongly support the expansion and redrafting of Policy 18 to give effect to the NPS-FM.</p> <p>However, as drafted the proposed changes to Policy 18 do not give proper effect to :</p> <ul style="list-style-type: none"> • Policy 6 of the NPS-FM, regarding the protection of natural inland wetlands; and • Policy 10 of the NPS-FM, which specifically recognises the need for the protection of the habitats of trout and salmon. <p>The suggested amendments are intended to address this deficiency.</p> <p>The habitat of valued introduced species such as</p>

			<p>trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM.</p> <p>This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health.</p> <p>The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.</p>
<p>Method 53 (pp.39, 62 and 192) Support mana whenua and community restoration initiatives for indigenous ecosystems</p>	Oppose	<p>Retain original drafting without changes in Proposed Change 1.</p> <p>OR</p> <p>Amend to read: “Support mana whenua/tangata whenua and community restoration initiatives for indigenous coastal and freshwater ecosystems.”</p>	<p>Proposed Change 1 to replace “coastal environment, rivers, lakes and wetlands” with “indigenous ecosystems” in Method 53 is unclear and inappropriately narrow. It is also unnecessary to give effect to the NPS-FM.</p> <p>Restricting Method 53 to “indigenous ecosystems” excludes the habitats of valued introduced species such as trout, salmon, and gamebirds. Narrowing the focus of Method 53 as proposed:</p> <ul style="list-style-type: none"> • will introduce potential adverse environmental effects (such as trophic cascades);

			<ul style="list-style-type: none"> adopts a values-based approach to policies and management rather than science based; and does not give effect to Policy 10 of the NPS-FM
Policy 44 (pp. 39 and 144)	Support once amended	<p>Insert new paragraph (ba) to read: <u>“The habitats of indigenous freshwater species, trout and salmon are protected;”</u></p>	<p>Strongly support the proposed changes to Policy 44 in order to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai.</p> <p>However, as drafted the proposed changes to Policy 44 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency.</p>
Policy FW.3 (pp. 40 and 116)	Support once amended	<p>Amend paragraph (k) to read: <u>“(k) Require that urban development is located and designed to avoid the loss of river extent and values and natural inland wetlands, and to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;”</u></p> <p>Insert new paragraph (ka) to read: <u>“Require that urban development is located and designed to protect the habitats of indigenous freshwater species, trout and salmon;”</u></p>	<p>Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM.</p> <p>However, as drafted proposed new Policy FW.3 does not give proper effect to:</p> <ul style="list-style-type: none"> Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. <p>The suggested amendments are intended to address this deficiency.</p>

<p>Chapter 3.6 Chapter Introduction (pp. 59 - 59)</p>	<p>Support once amended</p>	<p>Reinstate original ecosystem health paragraph (p 59). WFGC would support the inclusion of “<u>composition, richness and dominance of valued indigeneous and introduced species</u>” to the original paragraph.</p>	<p>Proposed Change 1 to replace “loss of species, loss of overall diversity of species, loss of an ecosystems ability to function on an ongoing basis, and loss of complete ecosystems and types of ecosystems” with “the composition, richness and indigenous dominance of communities, functions of ecosystem processes, or the extent of the ecosystem remaining” in Chapter 3.6 Introduction is unclear and inappropriately narrow. It is also unnecessary to give effect to the NPS-FM.</p> <p>Restricting the Chapter 3.6 Introduction as proposed excludes the habitats of valued introduced species such as trout, salmon, and gamebirds, and;</p> <ul style="list-style-type: none"> • will introduce potential adverse environmental effects (such as trophic cascades); • adopts a values-based approach to policies and management rather than science based; and • does not give effect to Policy 10 of the NPS-FM
<p>Objective 16 (pp. 61)</p>	<p>Support once amended</p>	<p>Amend to read: “Indigenous ecosystems, and habitats <u>which support</u> significant ecosystem functions, services, <u>valued species</u> and / or biodiversity values, are protected, enhanced, and restored to a healthy functioning state.</p>	<p>WFGC supports the broadening of this objective beyond indigenous ecosystems and habitats.</p> <p>A focus on indigenous biodiversity, habitat, and ecosystems at the expense of other valuable habitats fails to give proper effect to the NPS-FM, and the recognition in Part 3.5(1)(a) of the NPS-FM of the interconnectedness of the whole environment. That recognition is in turn reflected in the attributes of ecosystem</p>

			<p>health in Appendix 1.A of the NPS-FM, which do not distinguish between indigenous and other valued habitats.</p> <p>As drafted, however, Proposed Change 1 does not give proper effect to Policy 10 of the NPS-FM which specifically recognises the need to protect the habitat of trout and salmon. The suggested amendment addresses this deficiency.</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those habitats containing valued introduced species.</p> <p>An unduly narrow Indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. Even ecosystems that may not be considered to be “indigenous dominant”, can play a significant role in the restoration of indigenous biodiversity. They are also important for the maintenance of valued non-indigenous species, such as trout, salmon, and gamebirds. The loss of protections, enhancements, and restorations of these habitats risks adverse environmental effects and weakened climate change resilience for the region.</p>
Policy 23 (pp. 61 and 118)	Support once amended.	Amend title to read: “Identifying indigenous ecosystems, and habitats with significant	The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give

		<p>biodiversity <u>or other</u> values, in district and regional plans”</p> <p>Amend chapeau to read: “By 30 June 2025, district and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity <u>and other</u> values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:”</p> <p>Insert new paragraph (f): <u>“(f) The habitat supports significant populations of trout, salmon or other valued introduced species together with indigenous species.”</u></p>	<p>better effect to the NPS-FM (including Policy 10).</p> <p>It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other habitats, while not indigenous dominant, are valuable and require identification and also protection.</p>
<p>Policy 24 (pp. 61 and 119)</p>	<p>Support once amended</p>	<p>Amend title to read: “protecting indigenous ecosystems, and habitats with significant biodiversity <u>or other</u> values, in district and regional plans”</p> <p>Amend chapeau to read: “By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity <u>or other</u> values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation</p>	<p>The suggested amendment is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protection of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>

		for an ecosystem or habitat with significant indigenous biodiversity <u>or other</u> values, they shall: ”	
Method 32 (pp. 61, and 184- 185)	Support once amended	<p>Amend title to read: “Partnering with mana whenua/tangata whenua and engaging with stakeholders, <u>and engaging with</u> landowners and the community in the identification and protection of significant values.”</p> <p>Amend chapeau to read: “Partner with iwi, hapū, marae and/or whānau, and engage with stakeholders, <u>and engage with</u> landowners and the community to:”</p> <p>Amend paragraph (c) to read: “(c) identification and protection of indigenous ecosystems and habitats with significant biodiversity <u>or other</u> values, including those of significance to mana whenua / tangata whenua;”</p> <p>Insert new paragraph (f) to read: <u>“(f) identifying and protecting the habitats of indigenous freshwater species, trout and salmon;”</u></p>	<p>WFGC recognises the special role of mana whenua as Treaty partners and kaitiaki. At the same time, GWRC has a responsibility to work alongside recognised stakeholders – such as WFGC as the statutory manager of freshwater species and habitats. The amendments to the title and chapeau of Method 32 reflect this responsibility.</p> <p>The suggested amendments to paragraph (c) and the suggested new paragraph (f) give effect to Policies 9 and 10 of the NPS-FM, which are not properly implemented in Proposed Change 1 as drafted.</p>
Policy 47 (pp. 62 and 145-146)	Support once amended	Redraft title to read: “Managing effects on indigenous ecosystems and habitats with significant indigenous	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policies 9 and 10).

		<p>biodiversity <u>and other values</u> – consideration”</p> <p>Amend chapeau to read: “When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity <u>or other values</u>, and in determining whether the proposed activity is inappropriate particular regard shall be given to:”</p> <p>Insert new paragraph (j): <u>“(j) protecting the habitats of indigenous freshwater species, trout, and salmon.”</u></p>	<p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening of protections for non-indigenous dominant systems and the subsequent adverse environmental effects on these (and the whole system).</p>
<p>Objective 16A (p. 63)</p>	<p>Support once amended</p>	<p>Amend title to read: “<i>The region’s indigenous ecosystems, <u>and habitats with significant biodiversity or other values</u>, are maintained, enhanced and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to <i>Te Rito o te Harakeke</i>.”</i></p>	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements,</p>

			and restorations risks adverse environmental effects and weakened climate change resilience for the region.
Objective 16B (p. 64)	Support once amended	Amend to read: “Mana whenua/tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are <u>recognised and provided for</u> in decision making.. Mana whenua/tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity <u>within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity</u> ”	WGFC support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for in decision-making and their role as kaitiaki is supported. At the same time, to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. .
Method 54 (pp. 64 and 193)	Support once amended	Amend title to read: “Assist landowners to maintain, enhance, and restore indigenous ecosystems <u>and habitats with significant biodiversity or other values.</u> ” Amend chapeau to read: “Assist landowners to maintain, enhance and/or restore indigenous ecosystems <u>and habitats with significant biodiversity or other values</u> identified by Methods IE.2 and CC.7, including by, but not limited to:” Amend paragraph (d) to read:	The suggested amendment follows from the suggested amendment to Objective 16, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse

		“(d) supporting landowners to restore significant indigenous ecosystems and habitats with significant biodiversity or other values by fencing and planting.”	environmental effects and weakened climate change resilience for the region.
Method CC.9 (pp. 64 and 191)	Support	Retain as drafted on p.64.	Note the typographical errors pp. 173 and 191, which read: “Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions”. These should be amended to read as per pp. 64.
Policy IE.1 (pp. 64 and 121)	Support once amended	Amend title to read: “Giving effect to mana whenua / tangata whenua roles and values when managing <u>maintaining</u> indigenous biodiversity – district and regional plans Amend paragraph (a) to read: “apply mātauranga Māori frameworks, and support mana whenua / tangata whenua to exercise their kaitiakitanga, in managing <u>maintaining</u> and monitoring indigenous biodiversity <u>within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity;</u> ”	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for “maintaining” rather than “managing” indigenous biodiversity.
Policy IE.2 (pp. 65 and 146)	Support once amended	Amend title to read: “Giving effect to mana whenua/tangata whenua role and values when managing <u>maintaining</u>	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for in decision-

		<p>indigenous biodiversity - regulatory.”</p> <p>Amend paragraph (a) to read: “providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to <i>Te Rito o te Harakeke</i>, <u>within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity</u>”</p>	<p>making and their role as kaitiaki is supported.</p> <p>At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats.</p> <p>The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for “maintaining” rather than “managing” indigenous biodiversity.</p>
<p>Policy IE.3 (pp. 65 and 166)</p>	<p>Support once amended</p>	<p>Amend title to read: “Maintaining and restoring indigenous ecosystem health <u>the health of indigenous ecosystems and habitats with significant biodiversity or other values.</u>”</p> <p>Amend chapeau to read: “To maintain, enhance and restore the ecosystem health, ecological integrity and ecological connectivity of the region’s indigenous ecosystems, <u>and habitats with significant biodiversity or other values</u>, and the ecological processes that support them, giving effect to <i>Te Rito o te Harakeke</i>, the Regional Policy Statement shall, as soon as practicable:”</p>	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>

		<p>Amend paragraph (a) to read: “identify the characteristics required for the region’s indigenous ecosystems <u>and habitats with significant biodiversity or other values</u> to be in a healthy functioning state, including the processes that enable them to persist over the long-term, and”</p> <p>Amend paragraph (b) to read: “identify strategic targets and priorities to ensure that management and restoration of indigenous ecosystems and habitats <u>with significant biodiversity or other values</u> (including pest management) are directed at areas [etc.]...”</p>	
<p>Chapter 4.4 Policy IE.4 (pp. 65 and 167)</p>	<p>Support once amended</p>	<p>Amend title to read: "Recognising the roles and values of landowners and communities in the management <u>maintenance and restoration</u> of indigenous biodiversity <u>and habitats with significant biodiversity or other values</u> – non-regulatory.”</p> <p>Amend the chapeau to read: “Recognise and provide for the values of landowners and communities as stewards of the indigenous biodiversity of the Wellington Region, by:”</p>	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements,</p>

		<p>Amend paragraph (a) to read: “involving communities in the identification of targets and priorities for protecting, enhancing and restoring indigenous biodiversity and habitats with significant biodiversity or other values; and”</p> <p>Amend paragraph (b) to read: “supporting landowner and community restoration of indigenous ecosystems and habitats with significant biodiversity or other values.”</p>	<p>and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>
Chapter 3.8 Introduction (pp. 66)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Objective 20 (pp. 71)	Support once amended	<p>Amend objective description to read: “Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, and indigenous and valued introduced ecosystems and biodiversity.”</p>	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and</p>

			weakened climate change resilience for the region.
Chapter 3.9 Chapter Introduction (pp. 76 – 81)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Objective 22 (pp. 82 – 88)	Support once amended	Amend paragraph e) to read: “Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and <u>indigenous and valued introduced biodiversity</u> ”	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>
Objective 22B (pp. 89)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM

Policy CC.4 (pp. 101)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy CC.6 (pp. 102)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy CC.7 (pp. 103)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 14 (pp. 112)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM

Policy 15 (pp. 113)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 17 (pp. 114)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 18 (pp. 115)	Support once amended	<p>Amend paragraph (g) to read: <u>“the habitats of indigenous species, and the habitats of trout and salmon are protected”</u></p> <p>Please note the typographical error in paragraph (g) which states “<i>Protecting</i> the habitats of indigenous species are <i>protected</i>”</p>	<p>WFGC acknowledge the need to amend Policy 18 to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai.</p> <p>However, as drafted the proposed changes to Policy 18 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency.</p> <p>It is also important to acknowledge the habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which has been carried through to Policy 10 of the NPS-FM.</p>

Policy FW.1 (pp. 116)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy FW.2 (pp. 116)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy FW.3 (pp. 116)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy FW.4 (pp. 117)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM

Policy 31 (pp. 125)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 32 (pp. 127)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 33 (pp. 128)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy IM.1 (pp. 133)	Support	Retain as drafted	Strongly support the implementation of Part 3.2 of the NPS-FM through the new proposed Policy IM.1.

Policy IM.2 (pp. 134)	Support	Retain as drafted	Necessary to give effect to the NPS-FM
Policy CC.12 (pp. 136)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy CC.14 (pp. 136)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 41 (pp. 140)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM

<p>Policy 42 (pp. 141)</p>	<p>Support</p>	<p>WFGC support these changes and their inclusion into the RPS as currently drafted.</p>	<p>Necessary to give effect to the NPS-FM</p>
<p>Policy FW.5 (pp. 145)</p>	<p>Support</p>	<p>WFGC support these changes and their inclusion into the RPS as currently drafted.</p>	<p>Necessary to give effect to the NPS-FM</p>
<p>Policy 52 (pp. 149)</p>	<p>Support once amended</p>	<p>Amend paragraph (e) to read: “adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity and <u>habitats of indigenous freshwater species, trout, and salmon</u>;</p> <p>Insert new paragraph (ea) to read: <u>“ensuring that there is no further loss of natural inland wetlands or river extent and their values are protected”</u></p>	<p>Strongly support the proposed changes to Policy 52 and the incorporation of the concept of Te Mana o Te Wai in paragraph (e).</p> <p>However, hazard mitigation measures such as stop banks or weirs can interfere significantly with the habitat of indigenous freshwater species, trout, and salmon, and have significant impacts on the extent and values of both rivers and wetlands. This is not fully captured in paragraph (e) as drafted.</p> <p>The suggested amendments address this issue and is intended to give better effect to the NPS-FM Policies 6, 7, 9 and 10.</p>

Policy UD.2 (pp. 156)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy UD.3 (pp. 156)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 61 (pp. 159)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy FW.6 (pp. 159)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM

Policy CC.15 (pp. 163)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy CC.17 (pp. 164)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy CC.18 (pp. 164)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 65 (pp. 164)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM

Policy FW.7 (pp. 166)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy FW.8 (pp. 166)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Policy 67 (pp. 167)	Support	WFGC support these changes and their inclusion into the RPS as currently drafted.	Necessary to give effect to the NPS-FM
Chapter 4.5 Method IE. 4 (pp. 172, 175, and 192) Establish kaitiaki programmes	Support	Work in partnership with tangata whenua to establish and resource kaitiaki programmes	WFGC look forward to working in partnership with tangata whenua and support resourcing of kaitiaki programmes to assist in achieving positive environmental outcomes for our valued freshwater species.

Method 1 (pp. 177)	Support once amended	Amend the following policies prior to integrating into district plans: Policy FW.3 Policy 23 Policy 24 Policy IE.1	WFGC in general supports the amendment of district plans to implement policies <u>after</u> the policies listed here have been amended or agreed on.
Method 2 (pp. 178)	Support once amended	Amend the following policies prior to integrating into district plans: Policy 12 Policy 18 Policy 23 Policy 24 Policy IE.1	WFGC in general supports the amendment of district plans to implement policies <u>after</u> the policies listed here have been amended or agreed on.
Method 4 (pp. 178)	Support once amended	Amend the following policies prior to integrating into district plans: Policy 40 Policy 47 Policy 52 Policy IE.1	WFGC in general supports the amendment of district plans to implement policies <u>after</u> the policies listed here have been amended or agreed on.
Method 5 (pp. 179)	Support	Retain as drafted	Necessary to implement the NPS-FM.

<p>Method FW.1 (pp. 179)</p>	<p>Support once amended</p>	<p>Amend to read: “Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua <u>and stakeholders, and in consultation with landowners and community</u>, as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP, for each whaitua no later than December 2026. [etc]...”</p>	<p>WFGC is disappointed that implementation of the NOF contained in Part 3, Subpart 2, of the NPS-FM has been deferred. Without full implementation of this framework Proposed Change 1 fails to give effect to this central element of the NPS-FM, which is urgently required to avoid adverse effects on the environment.</p> <p>WFGC considers that Freshwater Action Plans must be adopted as a matter of priority and absolutely no later than December 2026 deadline proposed.</p> <p>WFGC further supports the intention to ensure that mana whenua/tangata whenua values are properly recognised and provided for in the Action Plans and their role as kaitiaki is supported.</p> <p>At the same time, however, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment is intended to achieve this outcome.</p>
----------------------------------	-----------------------------	--	---

<p>Method IE.1 (pp. 180)</p>	<p>Support once amended</p>	<p>Amend to read: “Partner with mana whenua / tangata whenua <u>and stakeholders, and engage with landowners and community,</u> to identify the local approach to give effect to Te Rito o te Harakeke and develop guidance on how to implement this.</p>	<p>Support the intention to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported.</p> <p>At the same time, however, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats.</p>
<p>Method UD.1 (pp. 181)</p>	<p>Support</p>	<p>Retain as drafted</p>	<p>Necessary to implement the NPS-FM</p>
<p>Method IM.1 (pp. 182)</p>	<p>Support</p>	<p>Retain as drafted</p>	<p>Necessary to implement the NPS-FM</p>

Method IM.2 (pp. 182)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method FW. 2 (pp. 183)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method 30 (pp. 183)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method 34 (pp. 185)	Support	Retain as drafted	Necessary to implement the NPS-FM

Method 46 (pp. 187)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method CC.4 (pp. 188)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method CC.6 (pp. 189)	Support once amended	Amend paragraph c) to read: “Provide resilience for indigenous and valued introduced biodiversity from the impacts of climate change, enabling ecosystems and species to persist or adapt...”	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>

<p>Method IE.2 (pp. 189)</p>	<p>Support once amended</p>	<p>Amend Method IE.2 to read: “Partner with mana whenua / tangata whenua <u>and stakeholders</u>, and engage with interested parties to develop a regional inventory of opportunities for offsetting or compensating for any residual adverse effects on ecosystems and habitats with <u>significant indigenous or valued introduced biodiversity values</u>”</p>	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>
<p>Method IE.3 (pp. 189)</p>	<p>Support once amended</p>	<p>Amend Method IE.3 to read: “Develop and implement, in partnership with mana whenua / tangata whenua and in collaboration with territorial authorities, communities and other key stakeholders, a regional biodiversity strategy to maintain and restore <u>indigenous and valued introduced biodiversity</u> at a landscape scale, incorporating both Maturanga Maori and systematic conservation planning.”</p>	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous – centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and</p>

			weakened climate change resilience for the region.
Method 21 (pp. 190)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method 48 (pp. 190)	Support	Retain as drafted	Necessary to implement the NPS-FM
Method CC.8 (pp. 191)	Support	Retain as drafted	Necessary to implement the NPS-FM

<p>Chapters 3 and 5: Objective A – integrated management (pp. 5 and 194)</p>	<p>Support once amended</p>	<p>Replace with an environmental result such as:</p> <p><i>‘recognition of the importance of Te Ao Māori and Matuaranga Māori, and collaboration with community and other stakeholders, leads to integrated management of natural resources with a significant stated improvement in community engagement with environmental projects with noted positive environmental improvements.’</i></p>	<p>Support an overarching objective that incorporates:</p> <ul style="list-style-type: none"> • incorporates a Te Ao Māori worldview and Maturanga Māori; and • recognises the holistic nature and interconnectedness of all parts of the natural environment. <p>As drafted, however, the objective lacks:</p> <ul style="list-style-type: none"> • a clear statement of the desired environmental outcomes to be delivered by the proposed approach to integrated management; and • does not reflect the role of the community and other stakeholders.
<p>Objective 13 (p. 199)</p>	<p>Support once amended</p>	<p>Amend AER’s to read:</p> <p>“1. Macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance in rivers and lakes is maintained improving across the Region.</p> <p>[...]</p> <p>4. Existing fish habitat, fish populations and the diversity of valued fish fauna is maintained or increased across the region.</p> <p>5. There is no loss of the significant amenity and recreational values or significant indigenous ecosystems and habitats with significant biodiversity or other values associated with the</p>	<p>Strongly support this objective. However, the statement of environmental outcomes requires amendment in order to fully give effect to the NPS-FM, particularly Policy 10, the emphasis on interconnectedness in Part 3.5, and the attributes in Appendix A.2.</p> <p>The proposed amendments are intended to address this deficiency.</p> <p>In addition, anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased ‘valued’ species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.</p>

		rivers and lakes identified in Appendix 1.”	
Objective 14 (pp. 200)	Support	Retain as drafted	Necessary to implement the NPS-FM
Definitions – Restoration (p. 225)	Oppose	Amend to read: “The active intervention and management of modified or degraded habitats, ecosystems, landforms and landscapes in order to reinstate indigenous natural character, indigenous and valued ecological and physical processes, and cultural and visual qualities. The aim of restoration actions is to return the environment, either wholly or in part, to a desired former state, including reinstating the supporting ecological processes.”	Re-wording this definition to include valued ecosystem properties and species, whether indigenous or introduced, captures a wider range of important physical and ecological attributes for protection and restoration.
Te Rito o te Harakeke (pp. 226)	Support	As drafted	Values, supports, and acknowledges the web of interconnectedness between indigenous species, ecosystems, the wider environment, and the community.

Concluding Statement

Wellington Fish and Game Council's submission on the proposed Plan Change 1 to the Regional Policy Statement of Greater Wellington Regional Council focusses on ensuring that the overarching National Legislation (such as the RMA, NPS-FM, Wildlife Act and Conservation Act, and Te Mana o te Wai) are integrated into the RPS with clarity and integrity.

Of significant note in this RPS is the total exclusion of protection of habitat for trout and salmon, as is required under the RMA and the NPS-FM. There is a noted the focus on indigenous species, habitats, and ecosystems throughout Proposed Change 1, at the expense of other significant habitat values. This fails to give proper effect to the NPS-FM, and therefore should be widened to encapsulate valued introduced species to ensure robust and wide-reaching environmental protections within a changing climate are embedded within the RPS.

The identification of long-term visions for freshwater and the implementation of the National Objective Framework are also absent in this Proposed Plan Change 1 which must be rectified to correctly implement the NPS-FM and to avoid adverse environmental effects caused by lack of clarity in the RPS.

Wellington Fish and Game Council strongly supports the concept of Te Mana o te Wai and looks forward to a succinct and integrated expression of how these concepts and hierarchies will be expressed in the Greater Wellington Region. The opportunity for true partnership between legislative bodies, statutory managers, tangata whenua / mana whenua, stakeholders and the community is keenly anticipated.

Wellington Fish and Game Council wish to be heard in respect of this submission.

Yours sincerely

Phil Teal

Chief Executive

14 October 2022

References

Hughey, K., Kerr, G. & Cullen, R. (2007). Public perceptions of New Zealand freshwater and its management – reconciling the science and management implications. *Australasian Journal of Environmental Management* 14. (2). Retrieved from <https://www.tandfonline.com.ezproxy.massey.ac.nz/doi/pdf/10.1080/14486563.2007.10648705>

Joy, M. (link undated below.). A fish index of biotic integrity (IBI) for the Northland Region. Retrieved from: <https://www.envirolink.govt.nz/assets/1921-NLRC211-A-Fish-Index-of-Biotic-Integrity-IBI-for-the-Northland-Region.pdf>

National Policy Statement for Freshwater Management (2020). New Zealand Government. Retrieved from: <https://environment.govt.nz/assets/Publications/Files/national-policy-statement-for-freshwater-management-2020.pdf>

Science and Technical Advisory Group meeting minutes (1 May 2019). Retrieved from: <https://environment.govt.nz/assets/publications/freshwater-policy/science-and-technical-advisory-group-meeting-minutes-may-19.pdf>