

SPEAKING NOTES OF **LILY CAMPBELL**
ON BEHALF OF THE **WELLINGTON FISH AND GAME COUNCIL**

20 February 2024

Tēnā koutou katoa.

My name is Lily Campbell.

1. I would like to begin, by acknowledging that the loss, and continued degradation, of indigenous ecosystems is a serious issue for the region, and that protection is very important. Fish and Game support this sentiment wholeheartedly.
2. However, I consider that it is important to note, that regional councils have a duty to maintain and enhance ecosystems in water bodies regardless of whether they are indigenous or not, as outlined in RMA s30(1)(c).
3. The outstanding relief I will focus on in my evidence today, is in relation to Method 53.

METHOD 53

4. In the operative RPS, Method 53 reads as follows:

*'Support community restoration initiatives for the coastal environment,
rivers, lakes and wetlands'*

5. Method 53 is intended to achieve the policies and objectives of the regional policy statement with respect to the following topics: fresh water, indigenous ecosystems, and the coastal environment.
6. Fish and Game submitted requesting that the original, operative drafting of the method is retained.
7. In her s42A report, Ms Guest responded to Fish and Game, stating that reference to indigenous ecosystems results in *'broadening'* of Method 53, as it will apply to both terrestrial and aquatic ecosystems. She continues to state that:

*'referring simply to indigenous ecosystems is more efficient than referring
to all the domains'*

8. As noted in my evidence for Hearing Stream 6, the change to Method 53 to result from PC1, narrows the scope of the method, rather than widening it. In the operative wording, the method applied to the coastal environment, rivers, lakes and wetlands, regardless of whether the flora and fauna is indigenous to New Zealand, or not.
9. The shift from the operative to notified wording, diminishes the overall support for restoration initiatives, by excluding any non-indigenous ecosystems.
10. In her rebuttal evidence, Ms Guest states that she does '*not agree that the RPS should support restoration of non-indigenous habitats*'. She goes on to state that '*in terms of aquatic ecosystems, I am not aware of any functions under the RMA that direct this*'.
11. I would like to note, that the definition of ecosystem in the RPS includes both terrestrial and aquatic organisms. In addition, the introduction to the Indigenous Ecosystems chapter refers to an ecosystem as:

'a community of plants, animals and micro-organisms interacting with each other and their surrounding environment.'

12. Habitat is also listed as one of the key biophysical components that contribute to ecosystem health, under Appendix 1A of the NPS-FM.
13. Therefore, it is my understanding that habitat forms part of an 'ecosystem'.
14. It is for these reasons, that I consider that there is indeed direction under the RMA to support non-indigenous ecosystems and habitat, in particular:
 - (a) Section 7(h) which directs the protection of trout and salmon habitat, but also
 - (b) Section 6(a) which directs preservation of the natural character (of the coastal environment, wetlands, lakes and rivers) of which habitat is a key part of.
15. In addition to Indigenous Ecosystems, Method 53 is listed as method to implement the objective and policies contained in the Freshwater and Coastal Environment chapters.
16. I consider it inappropriate to narrow the scope of the method to indigenous ecosystems, when it was clearly intended to be applied to freshwater and coastal topics generally.

Thank you.

I welcome any questions from the Panel.