Submission on the proposed National Policy Statement for Indigenous Biodiversity

These photos demonstrate the points made in my submission.

Kākā is a native parrot that is not commonly seen in Auckland. These birds have been seen at Ōwairaka on a number of occasions – usually in exotic trees.

The NPSiB should more strongly recognise the role that exotic trees play in supporting indigenous flora and fauna and any transition to native flora should be done over a lifetime.

Heron egg shells, found below its nest in a pine tree on Mt Richmond.
A flourishing 100% native understory growing up under the protective cover of a gum tree at Owairaka / Mt Albert. There are countless examples like this on the maunga.

Native seedlings planted in the open at Owairaka last winter are struggling, with many having died. This was always bare ground, so we acknowledge only the hardiest of plants will survive here. However, this type of inhospitable environment will be created throughout the maunga if 345 healthy, mature trees are felled.

Despite months of drought, many native self-seeded species such as kawa kawa, karamu, karaka and totara can be seen flourishing at Owairaka under the protective canopy of the (ribboned) exotic tree to rear. They are lush and healthy.

Note the thick leaf-litter mulch helps to trap moisture, and dappled light protects the seedlings from harsh sun. Given that Tupuna Maunga Authority considers there to be a huge number of exotic “pest” species on Owairaka, it is ironic that 99.9% of the self-seeded plants are native species and not exotics.
Some of many examples of Tupuna Maunga Authority's native “revegetation” at Auckland's maunga

Two out of three native saplings planted by the car park at Ōwairaka have died. These saplings would have survived if under the protective cover of mature trees. Note the largely dead row of native grasses at the base of the retaining wall.

I am worried the NPSIB will lead to much more of the following destruction:

Pigeon Mountain post-felling
Mangere Mountain post-felling of exotic trees

Many examples of dead plants at Mangere Mountain, still in their plastic pots, can be seen at the “revegetated” maunga.
Last year Tupuna Maunga Authority removed a grove of 100 mature olive trees from this steep slope on Mt Richmond. The arbourist felling the trees told a local resident that they were the largest and most impressive olive trees he had ever seen and how it seemed a shame to cut them all down. Tupuna Maunga Authority intends to come back and fell the rest of the exotic trees seen in this photo.

Many dead native plantings, still sitting in plastic pots at Mangere Mountain
A visual metaphor for how the NPSIB could be rewritten - A cherry tree intertwined with a totara, at Ōwairaka / Mt Albert
I am including this submission that we made on Tūpuna Maunga Authority’s 2020 / 21 Draft Operational Plan to demonstrate the types of abuse of power and cynical approach towards the wider public’s views that I fear will arise if the NPIBS does not put robust checks and balances in place.

About Honour the Maunga

Honour the Maunga is a grassroots community group that has occupied Ōwairaka / Mt Albert around the clock since 11 November 2019 in protest at Tūpuna Maunga Authority’s plans to fell 345 healthy, mature exotic trees. Our members are drawn from all ethnicities (including Māori) and walks of life, and range in age from 16 to 98 years.

We support the Authority’s long-term vision of cloaking the maunga in native vegetation but are deeply concerned about the environmentally destructive process for achieving this vision – a process that also undermines amenity values on the maunga.

Despite how we have been portrayed by some, our concerns are not founded by racial or anti-Treaty settlement sentiments. We are questioning flawed processes; we are not questioning a people. Furthermore, we are questioning decisions made by the Authority’s Auckland Council members, as much as anybody. Under Tūpuna Maunga Authority’s co-governance structure, the Auckland Council members are there to represent the interests of “the other people” of Auckland – as well as the interests of all ratepayers, including Ngā Mana Whenua citizens who are ratepayers. We note that “the other people” include Māori who are not members of the 13 iwi / hapu who directly benefited from the Treaty settlement.

Honour the Maunga makes no apology for questioning highly inappropriate aspects of the Operational Plan – actions that represent significant misuse of ratepayers’ money and significant waste of money that could be put to far more constructive uses such as increased funding for education programmes that help share the Tūpuna Maunga values and increase Ngā Mana Whenua and the other peoples of Auckland’s support for and engagement in the protection and restoration of these values.

As the pioneering politician Whetu Tirikatene-Sullivan so wisely said: “Race differences shouldn’t be divisive, but enriching”.

Our submission on the specific details of the 2020/21 operational plan is as follows:

A disconnect between the Operational Plan and the Tūpuna Maunga values

As page 26 of the plan notes: “The values weave together and give expression to mana whenua and other world views, and the connections and histories in a manner that highlights the way in which these
views complement each other and create a richness to the relationship that people have with the Tūpuna Maunga and multiple ways in which these relationships are thought of and expressed.”

Although the Plan does give effect to many of the stated values and associated meanings, Honour the Maunga is concerned about the following disconnects between the values and the Draft Operational Plan.

**Tūpuna value: Waituatanga / Spiritual – tread lightly**

Native revegetation should involve a transitional approach that takes many decades. This will ensure the Authority treads lightly upon the maunga environments as well as the wider environment.

Auckland has already lost more than 30% of its tree cover since Resource Management Act changes in 2015 removed tree protection.

Auckland Council has declared a climate emergency so removing nearly 2000 healthy mature trees from Auckland’s maunga in a short period of time is completely counter to the value of treading lightly.

Trees also provide habitats for innumerable lifeforms – including rare native birds. This year’s operational plan’s wording appears to be the same as last years’ so we would assume the Authority still plans to remove fell all exotic trees. Using Ōwairaka as an example, we fail to see how removing nearly half of the maunga’s tree cover could in any way be construed as treading lightly in terms of the effect it will have on birds and other biota – not to mention the many thousands people who love the maunga and its flourishing environment.

An experienced arbourist has advised us that mass removal of exotic trees will likely result in mature native trees dying as well, because the environment in which they are currently co-existing with exotics will become far more exposed and far drier.

**Tūpuna value: Mana Aotūroa / Cultural Heritage**

Honour the Maunga notes the past four month’s tree-related events have revealed a significant disconnect between the Operational Plan’s action items, and the plan’s imperative to “recognise European and other histories and interaction with the Maunga”.

At the TMA hui held on Ōwairaka, some attendees made it clear they felt exotic trees represented symbols of European colonisation, and that their removal would have a restorative effect on their personal mana (Zane Wedding, public statement, 27/11/19). Furthermore, we recently received a first-hand report of a statement to similar effect being expressed by an Authority staff member. We acknowledge that both statements were made by private individuals but in the absence of any clear ecological or biosecurity justification for removing 46% of the mature trees on Ōwairaka and hundreds of exotic trees from all maunga, we wonder if in fact a symbolic cleansing is indeed the underlying motivation? If so, then this is at significant variance with the Authority’s stated values and pathways.

While we acknowledge that the grievances and intergenerational trauma caused by colonisation must be addressed, this should be done in a constructive rather than destructive way. Aggressively and rapidly destroying urban forests on the Tūpuna Maunga in the name of symbolic redress for past wrongs is contrary to the Collective Redress Act’s intention, the Integrated Management Plan and also the Tūpuna Maunga values. We strongly urge the Authority – especially its Auckland Council members who...
are there to represent “the other people of Auckland” – to reconsider the plan to remove the exotic trees from Ōwairaka and all other maunga.

**Tūpuna value: Mauri Pūana Hauropi / Ecology and Biodiversity**

Removing all of the exotic trees in a short timeframe also undermines all aspects of this value (i.e. strengthen ecological linkages between the maunga / restore the biodiversity of the maunga). But most significantly of all, it undermines the values meaning: *Maunga ā tū mauri ora, maunga tu Makaurau ora / If the Maunga are well, Auckland is well*

Refer to the ecological and environmental discussions throughout this submission that support our concerns about how removing all exotic trees will undermine this intent. We note that Ōwariraka is a significant ecological area (SEA). Removing nearly half the canopy will negatively affect the maunga’s biodiversity and its SEA status when these trees are known habitat trees. We also note that the healthy mix of native and exotic trees on Ōwairaka, with many of the mature exotic trees sheltering a flourishing understory of 99.9% native seedlings demonstrates biodiversity in action. The transition from exotic to 100% native vegetation is already happening naturally and in an environmentally sound manner. Felling all non-native trees will set back this process by many decades.

![Native seedlings planted in the open at Ōwairaka last winter are struggling, with many having died. This was always bare ground, so we acknowledge only the hardiest of plants will survive here. However, this type of inhospitable environment will be created throughout the maunga if 345 healthy, mature trees are felled.](image)

![Despite months of drought, many native self-seeded species such as kawa kawa, karamu, karaka and totara can be seen flourishing at Ōwairaka under the protective canopy of the (ribboned) exotic tree to rear. They are lush and healthy. Note the thick leaf-litter mulch helps to trap moisture, and dappled light protects the seedlings from harsh sun. Given that the TMA considers there to be a huge number of exotic “pest” species on Ōwairaka, it is ironic that 99.9% of the self-seeded plants are native species and not exotics.](image)

**Tūpuna value: Mana Hononga Tangata / Living Connection**

The operational plan’s tree removal actions undermine this value’s intention to “actively nurture positive relationships”. Opposition to the tree felling continues to grow – not only within Auckland but throughout New Zealand - and the world.

As has been found over the past four months, the exotic tree felling issue has proven to be extremely divisive. The Treaty settlement for Auckland’s maunga was designed to foster a spirit of partnership and
positive relationships between Mana Whenua and the other people of Auckland, which is why the Authority was established as a bespoke co-governance organisation. Sadly, some aspects of the Tūpuna Maunga Authority’s operational plan undermine this intent, as evidenced by the exotic tree issue.

People from communities adjacent to maunga where trees have already been felled tell us they feel a strong sense of antipathy towards the Authority as a result – hardly the sense of partnership this value is striving for.

It is evident that Ngā Mana Whenua and the other people of Auckland love Auckland’s maunga and their environments; the Authority is losing a valuable opportunity to nurture positive relationships by taking such unpopular and destructive action.

Tūpuna value: Mana Whai a Rehia / Recreational

Destroying the natural environment is counter to this value’s desire to “promote health and wellbeing”. Immense health and amenity values will be lost by removing such a large proportion of the maungas’ vegetation, given that it will take many decades for the young native plantings (only a small proportion of which are trees) to reach maturity.

Concerns about the work programme overview / work programme

Deceptively vague wording

At the 12 February 2020 Auckland Council Governing Body meeting, Cr Christine Fletcher expressed concern that the wording in last year’s operational plan gave no hint that the Authority planned to remove all exotic trees off all maunga under its control. She questioned how she could be certain that other unpalatable actions were not hidden in this year’s plan.

Honour the Maunga shares her concerns. An example of the disconnect between the Tūpuna Maunga Authority’s Integrated Management Plan, operational plans and subsequent actions can be seen Treescape’s Ōwairaka-Mt. Albert Aboricultural Operations Plan Report, under ‘Provenance’, which refers to a “tree’s place of origin”. On page 5, it states: “An objective of this project is [to] remove any species not originating in NZ (exotics) from the maunga. Identifying exotics is a key function of the tree survey.”

Tūpuna Maunga Authority commissioned the report in September 2018 but the intention to remove all exotic trees was not stated, nor even implied, in the Authority’s Draft Operational Plan 2019 or the Integrated Management Plan. Nor do the Authority’s hui minutes contain any evidence of discussions that prompted such a major shift from removing some selected exotic trees, to removing them all. Yet the reports and big budgets to do so were ratified by Tūpuna Maunga Authority and Auckland Council alike. We question how a budget for the major, contentious, policy to remove all exotic trees could have been approved with no evidence of any debate about it. As discussed later on in this submission, we also question the extent to which past and current operational plans are sufficiently clear in expressing the Authority’s true intentions.

We note, with disappointment, that this year’s plan’s wording is almost identical to last year’s one.

Such deliberately vague wording does not engender a sense of trust in the Authority’s intentions. An uninformed reader of this year’s draft operational plan – or the Integrated Management Plan - would be forgiven for having no clue that it proposed the needless destruction of nearly 2000 healthy, mature trees from Auckland’s volcanic cones.

History has shown the Authority and Auckland Council have tried to undertake this programme by stealth. For example, a non-notified resource consent for the Ōwairaka trees removal was issued in February 2019 yet nobody in the local community was informed until late October – two weeks before the felling was due to begin. Such actions are counter to the Authority’s values and generate distrust.
and antipathy towards the Authority and Auckland Council alike. It also does not engender positive relationships and partnerships between Ngā Mana Whenua and the other people of Auckland.

While on one hand we wish to express support for many aspects of this year’s Operational Plan, we wonder what other controversial intentions are hidden within. We encourage the Authority to reword the plan in a way that makes its intentions crystal clear.

**Restoration of indigenous native ecosystems / reintroducing native plants and attracting native animal species / removing inappropriate exotic trees and weeds / pest control**

We would like to draw to the Auckland Council and Tupuna Maunga Authority’s attention a number of inaccuracies around the Authority’s public statements in relation to Ōwairaka, which are as follows:

**Pest species:** Despite the Authority repeatedly and inaccurately claiming over half of Ōwairaka’s non-native trees are “pests” and also claiming that olives are pests, only 7 individual trees on the maunga are listed as pests in the Auckland Regional Pest Management Strategy. Olives are not listed as a pest.

In the reference to “control of cherry, privet” on page 73 of the Draft Operational Plan, we note that there is only one privet on Ōwairaka / Mt Albert. We question the reference to controlling cherry trees. There are no cherries on the ARPMS pest list. However, Taiwanese cherry (*Prunus Campanulata*) is listed as a weed. The cherry trees on Ōwairaka / Mt Albert are Japanese cherry (*Prunus Serralata*) which is not a pest or a weed. There is no reason to fell any cherry trees on the maunga.

**Health and safety risk:** The Authority regularly shows a photo of a fallen tree on Ōwairaka as “proof” of there being a health and safety risk. What it fails to point out is that tree fell during the 2017 storm where hurricane-force winds toppled trees all over the region. That only one fell on the maunga, given its exposed location, is testament to the stability and health of its trees.

Furthermore, we can find no evidence of any independent health and safety report relating to Ōwairaka’s trees.

Several arbourists have visited the maunga and have told us that, apart from some trees in need of routine light maintenance such as pruning, there is no obvious evidence that any pose a significant health and safety risk.

“Inappropriate” exotic trees: As discussed above, it is evident that the Authority considers all non-native trees to be “inappropriate”.

With a very few minor exceptions, it is Honour the Maunga’s view that there is absolutely no reason to fell non-native trees on Auckland’s maunga.

**Maintaining ecological biodiversity during the succession to 100% native vegetation:**

As can be seen in the flourishing native seedling understory at Ōwairaka, and the abundant native birdlife, ecological biodiversity is naturally working well and supporting long-term succession to native flora and fauna. The Operational Plan’s approach undermines ecological biodiversity in many ways.
**Planting methodology a failure:** There are numerous examples of failed plantings on maunga whose exotic trees have already been felled, as can be seen in these photos taken on Mangere and Pigeon mountains.

Plantings cannot survive if left unattended in plastic pots sitting on the ground. We can only but assume this was a failed attempt at mound planting. This planting technique is not suitable on sites that are very dry or have a high risk of summer drought. This is because mounds will typically dry out and the plants growing on them may not survive. For this reason, mounding should also be avoided on sunny, exposed or north-facing slopes and ridges.

Continuing to use this technique will not only doom those plantings to inevitable failure but also waste money.

**Poor maintenance:** Even where native seedlings have been planted (e.g. Ōwairaka) in the ground, a huge proportion have died because of neglect and / or because they are not species whose juvenile forms do not do well in harsh open environments.

In fact, so many native plantings died at Ōwairaka that public complaints resulted in the Authority sending in a water truck.

Removing all exotic trees, rather than mitigating risks through appropriate maintenance, is an extremely aggressive and financially costly response to an issue that is not a major problem.

Only seven of the 345 exotic trees on Ōwairaka mountain are classified as pests under the Auckland Regional Pest Management Strategy.

Furthermore, the significant ecological impacts likely to occur would create significant harm to the forest as a whole, the wildlife it supports, and the mountain itself, which would suffer further erosion.

**Volunteer programmes to connect communities to the Tūpuna Maunga /**

**Programmes and community events that celebrate the living connection that all communities have with the Tūpuna Maunga**

Many of the volunteers at last winter’s native tree planting session at Ōwairaka have told us they felt betrayed when they later learned of the plans to get rid of all the non-native trees. Going ahead with such destructive and divisive action will undermine future volunteer programmes to connect local communities with the Tūpuna Maunga.

Honour the Maunga’s members and members of the wider Mt Albert and Auckland communities are united in caring deeply about the maunga. We may not be Ngā Mana Whenua, but we still have deeply held spiritual and historical links to the maunga. We also care so deeply about the maunga itself, and its
environment and ecology, that we have been able to maintain a 24/7 tree protection occupation for the past four months.

Other maunga communities are telling us they feel similar connections and we are aware of plans to occupy other maunga should felling begin there.

We encourage the Authority to harness those community energies in a positive way so that future volunteer programmes and public activities on the maunga are cause for unity and celebration, not division and discord.

**Sharing European and other histories and geological significance**

The Draft Operational Plan refers to sharing and encouraging collective stewardship of existing historical heritage.

Trees form an enormous part of that heritage, with many of Ōwairaka’s trees having been planted by community members and/or their families. Destroying exotic trees destroys that expression of non-Mana Whenua heritage.

European heritage may be the predominantly expressed in those trees, but other heritages are expressed too. For example, the many olive trees on Auckland’s maunga are deeply significant for people from middle-Eastern and African cultures, including Naima pictured here.

While Mana Whenua histories must of course be show-cased, it is important that all histories – of other iwi and other ethnicities – are acknowledged on Auckland’s maunga.

“All projects are designed to deliver outcomes for the 13 iwi / hapū of the Tāmaki Collective and all the people of Auckland…” and that the will also “enable a compelling case for a future UNESCO World Heritage bid for the Tūpuna Maunga”.

We note that “Communities” are a core pillar in the UNESCO World Heritage’s Strategic Objectives, which states:

“This is necessary because: a) Heritage protection without community involvement and commitment is an invitation to failure; b) Coupling community to the conservation of heritage is consistent with international best practice, as evidenced by comparable international regimes; c) Conservation, capacity building, credibility and communication are all intrinsically linked to the idea of community. d) Heritage protection, should, wherever possible, reconcile the needs of human communities, as humanity needs to be at the heart of conservation.”

Honour the Maunga’s members, and the many supporters we have engaged with over the months, support Ngā Mana Whenua (and other) histories and culture being expressed on Auckland’s maunga and see the opportunity for positive – and healing – engagement with local communities in a positive Treaty partnership. However, in any transformative change the best approach is to work by the Tupuna Maunga Wiatautanga / Spiritual’s imperative to “tread lightly”. Doing so will bring “the other people of Auckland” with you, and it will also mitigate the risk of the World Heritage bid failing because of growing community concerns and protests over the Authority’s actions.
**Budgetary concerns**

As an Authority, the TMA can to an extent require Auckland Council to follow its directions. However, the Authority’s Auckland Council members are there to represent “the other people of Auckland”. As elected Auckland Council members, they are also obliged to ensure that fiscal prudence in the way the ratepayer funded operational plan is implemented. Furthermore, Auckland Council’s Governing Body is responsible for approving Tūpuna Maunga Authority’s Operational Plan budgets so also have a responsibility to all ratepayers.

We note that there is significant discrepancy between the operational / capital expenditure budgets / vegetation-related budgets and what we know to be the true costs involve in felling all exotic trees of Auckland’s maunga. For example, we know that tree felling on Maungarei / Mt Wellington and proposed tree felling on Ōwairaka / Mt Albert comes to around $2 million for tree felling and removal, reports, admin, etc.). Allowing for an average of $1 million per maunga, that would equate to around $14 million in total – an amount that would suggest that Tūpuna Maunga Authority’s opex / capex budgets comprise only part of the ratepayer funding picture. Apart from more transparency being needed, this places even greater onus on the Authority and the Council to exercise prudence with expenditure.

It has been suggested by various Authority members that the best cost efficiencies are to be gained by removing all exotic trees at once. We refute that suggestion given that they don’t need to be removed in the first place. Decades-long succession would enable any necessary removals to be absorbed into ongoing general maintenance budgets, with no special budget being required.

**An unfortunate “welcome”**

Much is made of the desire to restore Mana Whenua mana to the maunga, yet the first thing visitors to Ōwairaka see is a toilet block and two ugly gates in the Soviet Brutalist Architecture style.

We encourage the Authority to re-allocate its Ōwairaka tree felling budget to remedying these eyesores in a manner that does indeed restore mana to this beautiful maunga.