



Te Wai Māori

RESPONSE TO NATIONAL CLIMATE CHANGE RISK
ASSESSMENT

Te Tātai Tuwhera Hurriārangi mō Aotearoa





4 May 2020

Ministry for the Environment
Wellington

Attention: Fiona Newlove (fiona.newlove@mfe.govt.nz)

National Climate Change Risk Assessment for Aotearoa New Zealand - Te Tātai Tuwhera Huriārangi mō Aotearoa

Introduction

1. Thank you for providing the opportunity to comment on the draft: *National Climate Change Risk Assessment for Aotearoa New Zealand – Te Tātai Tuwhenua Huriārangi mō Aotearoa* prepared by Aecom ('the draft assessment') and the two supporting technical and methodology reports.

Who are we?

2. We are Te Wai Māori Trust (Te Wai Māori) and Te Ohu Kaimoana Trustee Ltd (Te Ohu Kaimoana). Our respective entities were established under the Maori Fisheries Act 2004 to further the agreements made in the Fisheries Deed of Settlement, agreed by Māori and the Crown in 1992.
3. Te Wai Māori works on behalf of 58 mandated iwi organisations (MIOs), who in turn represent all Māori. The purpose of Te Wai Māori is to advance Māori interests in freshwater fisheries through:
 - a. Undertaking or funding research, development and education;
 - b. Promoting the protection and enhancement of freshwater fisheries habitat;
 - c. Promoting the establishment of freshwater fisheries; and
 - d. Using resources to bring direct and indirect benefits to Māori in respect of their freshwater fisheries interests
4. Protecting Māori interests in freshwater fisheries ultimately means protecting habitat to ensure quality water and abundant species and empowering our people to uphold their responsibilities regarding freshwater fisheries. The long-term outcomes Te Wai Māori work towards include:
 - a. Enhancing the health and well-being of the indigenous fisheries and their environment;
 - b. Increasing iwi and hapū capacity and capability in freshwater fisheries and their ability to control their freshwater fisheries.
 - c. Fostering indigenous fisheries expertise, knowledge and understanding.
 - d. Increasing the quality and range of information to iwi and hapū on freshwater fisheries and their interests thereof.
 - e. Ensuring that the indigenous fisheries are well and can be enhanced.
5. Te Ohu Kaimoana was established to implement and protect the Deed of Settlement. Its purpose, set out in section 32 of the Maori Fisheries Act 2004, is to "advance the interests of iwi, individually and collectively, primarily in the development of fisheries, fishing and fisheries-related activities, in order to:
 - a. Ultimately benefit the members of iwi and Māori generally; and
 - b. Further the agreements made in the Deed of Settlement; and
 - c. Assist the Crown to discharge its obligations under the Deed of Settlement and the Treaty of Waitangi; and

- d. Contribute to the achievement of an enduring settlement of the claims and grievances referred to in the Deed of Settlement.
6. Te Ohu Kaimoana works on behalf of 58 Mandated Iwi Organisations (MIOs), who in turn represent all Māori. Asset Holding Companies (AHCs) hold Commercial Settlement Assets on behalf of their MIOs. These include Individual Transferable Quota and shares in Aotearoa Fisheries Limited which, in turn, owns 50% of the Sealord Group.
7. At a Special General Meeting in June 2015, MIOs confirmed they want Te Ohu Kaimoana to work on priorities agreed by them to protect and enhance the Settlement including undertaking advocacy and policy advice for iwi. Since then they have also approved a Māori Fisheries Strategy and three-year strategic plan for Te Ohu Kaimoana, which has as its goal “that MIOs collectively lead the development of Aotearoa’s marine and environmental policy affecting fisheries management through Te Ohu Kaimoana as their mandated agent”.
8. We set out our general comments below and provide comments on specific parts of the document in the attached template.

General comments

9. Aecom in their assessment acknowledge that comprehensive consultation with Iwi and hapū did not occur and to that end Te Wai Māori and Te Ohu Kaimoana have not been given an opportunity to be involved in the design or development of Aotearoa’s first national climate change risk assessment (NCCRA), nor in the development of the Ministry’s assessment framework which underpins the NCCRA. Accordingly, having been approached so late in the process we are not in a position to meaningful input into this important kaupapa and would like to express our dissatisfaction with this, which we consider falls severely short of a partnership approach. We also note that the timeframe for providing comment on the three draft documents is extremely tight, with only 7 working days provided to respond. Despite this, we would like to take the opportunity to highlight our initial thoughts and concerns, which are focused on the draft assessment, and invite you to meet with us to discuss our concerns.
10. We are concerned that the framework developed by MfE to guide the NCCRA has constrained the outcome of the assessment, given that the framework takes a reductionist approach in which the natural world is divided into distinct domains which is at odds with a Te Ao Māori worldview in which te taiao is as an undivided entity. This inherent incompatibility is acknowledged in section 7.2.3 of the draft assessment, which notes that the NCCRA ‘is not positioned within a Māori framework and therefore the relationship between the domains, their associated risks, and mātauranga Māori, is unclear’. Notwithstanding this, the preceding sections of the document draw tenuous parallels between the NCCRA and a Te Ao Māori view.
11. For instance, the draft assessment draws heavily on the Treasury Living Standards Framework for wellbeing and the National Disaster Resilience Strategy (as done in MfE’s assessment framework), overstating their complementarity to Te Ao Māori, while failing to identify any kaupapa Māori frameworks that could more appropriately be drawn on for the purposes of the NCCRA. While the mātauranga identified in section 2.1.1 of the draft assessment, intended as guiding principles, do not appear to have not been well incorporated or reflected into the engagement and assessment process for the NCCRA.
12. In summary we do not consider that the draft NCCRA gives adequate recognition to Te Ao Māori; mātauranga Māori; nor the principles of the Treaty of Waitangi and again stress our disappointment at the lack of engagement on this important kaupapa. We consider it highly unlikely that any amendments made to the draft will be sufficient to adequately address the concerns we hold, given that comprehensive consultation with Iwi and hapū has not occurred and that any window of opportunity to meaningfully influence the development, methodology and approach of the NCCRA has passed. To that end we recommend that the Ministry commission a further independent risk assessment report, co-designed with Māori.

13. We would like to meet with officials to discuss the concerns outlined and to gain some clarity on the next proposed stages of the process leading up to the development of the National Adaptation Plan.
14. If you would like to discuss this response please contact Carly O'Connor, Senior Policy Analyst: Te Wai Māori Trust - Carly.O'Connor@waimaori.maori.nz or by phone on 027 700 6856.

Noho ora mai rā,

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