

Climate Justice Taranaki Submission on the Ministry for the Environment Managing our Wetlands discussion document¹, 27 October 2021

1. While there are obvious problems with the current definition of 'natural wetland', we do not agree that any amendments in definition should facilitate the continuation of the current use or shift to more intensive, extractive, exploitative or polluting land use. Any shift in land use of once 'natural wetlands' should be towards wetland, biodiversity and/or ecological restoration.
2. We support the provisions of maintenance and biosecurity activities in general.
3. We are strongly against including any additional consenting pathways to the Resource Management (National Environment Standard for Freshwater) Regulations 2020 (NES-F), especially the proposed pathways for:
 - quarrying,
 - landfills, cleanfills, managed fills,
 - mineral mining (fossil fuels or not) and
 - urban development.
4. Consenting the above activities within or near a 'natural wetland' is against the principles of Te Mana o te Wai which gives priority to the health of water above all uses. This is especially pertinent given the huge amount of wetland we have already lost or heavily degraded. Wetlands play a critical role in carbon sequestration and climate regulation (Ausseil, et al. 2015)², a key part of nature-based solutions. We should protect all remnant wetlands and rewet drained wetlands including peatland³.
5. None of the proposed pathway activities could possibly qualify as of 'significant national or regional benefit' at this time of climate emergency and ecological breakdown. Any further loss of extent and value, or adverse effects on 'natural wetlands' cannot genuinely or effectively be made right with so-called 'offset' or means to 'compensate'. These are simply excuses to continue with business-as-usual – privatising the profits while socialising the losses.
6. Mineral mining for supposed 'clean technologies as part of the transition to a low emissions economy' is another smokescreen. It's purpose is to perpetuate the extractive, exploitative pathway that's central to the endless growth capitalistic, economic model that has led to our current climate and ecological crises, alongwith extreme social inequality.
7. A recent paper by Seibert and Rees (2021)⁴ eloquently explained, "*the pat notion of 'affordable clean energy' views the world through a narrow keyhole that is blind to innumerable economic, ecological, and social costs. These undesirable 'externalities' can no longer be ignored. To achieve sustainability and salvage civilization, society must embark on a planned, cooperative descent from an extreme state of overshoot in just a decade or two.*"
8. The document *Toitū Taranaki 2030 – A Community Powered Strategy for a Fast and Just Carbon Neutral Transition* (2021)⁵ developed by our group with community inputs, laid out the rationale, principles and ways forward.

¹ <https://environment.govt.nz/assets/publications/managing-our-wetlands-discussion-document.pdf>

² <https://agris.fao.org/agris-search/search.do?recordID=US201600013601>

³ <https://www.conservationevidence.com/actions/1756>

⁴ <https://www.mdpi.com/1996-1073/14/15/4508/htm>

⁵ <https://climatejusticetaranaki.files.wordpress.com/2021/05/toitu-taranaki-2030-just-transition-community-strategy-apr21-web.pdf>