IN THE HIGH COURT OF NEW ZEALAND
AUCKLAND REGISTRY

I TE KŌTI MATUA O AOTEAROA
TĀMAKI MAKAURAU ROHE

CIV-2019-404-2682

Under the	**JUDICIAL REVIEW PROCEDURE ACT 2016**
Between	**AVERIL ROSEMARY NORMAN AND WARWICK BRUCE NORMAN**
	Applicants
And	**TŪPUNA MAUNGA O TĀMAKI MAKAURAU AUTHORITY**
	First Respondent
And	**AUCKLAND COUNCIL**
	Second Respondent

AFFIDAVIT OF ANA RENKER-DARBY ON BEHALF OF THE TŪPUNA MAUNGA O TĀMAKI MAKAURAU AUTHORITY

Affirmed: 22 January 2020

BUDDLEFINDLAY
NEW ZEALAND LAWYERS
Barristers and Solicitors
Wellington

Solicitors Acting: **Paul Beverley / Sebastian Bisley**
Email: paul.beverley@buddlefindlay.com / sebastian.bisley@buddlefindlay.com
Tel 64 4 499 4242 Fax 64 4 499 4141 PO Box 2694 DX SP20201 Wellington 6140

I, **ANA RENKER-DARBY**, Research Assistant, of 94 Stanley Point Road, Devonport, solemnly and sincerely affirm:

Introduction

1. My full name is Ana Renker-Darby.

2. While I am not giving expert evidence, for completeness I have the following qualifications and experience relevant to the information in my affidavit:

   (a) I am a local member of climate activist group Generation Zero, which represents 38,367 young New Zealanders working to advance climate change action.

Generation Zero

3. Climate change is the challenge of our generation, and young people are the inheritors of humanity's response to climate change.

4. For that reason, Generation Zero, a non-partisan, youth-led climate organisation, was founded with the central purpose of providing solutions for New Zealand to cut carbon pollution through smarter transport, liveable cities and independence from fossil fuels.

5. We are witnessing a global shift away from polluting fossil fuels, and as New Zealanders, we are fortunate enough to possess an abundance of opportunities to make this transition.

6. We can power our homes, our industries and our economy with clean safe energy. We can build more liveable cities with greater housing and transport choices. We can move beyond fossil fuels and create a safer and healthier nation by doing so.

7. These solutions will not come from one minority, one political party, or one ideology. These solutions come from real New Zealanders, from all backgrounds joining together under a central vision.

8. It is time for New Zealand to step up, act responsibly and secure a safe thriving zero carbon Aotearoa.

9. I am authorised to give this affidavit on behalf of Generation Zero.

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Generation Zero supports Tūpuna Maunga Authority

10. Generation Zero supports the Tūpuna Maunga Authority ("**Authority**") in its plan to restore native bush to Ōwairaka. The planting of 13,000 native trees and removal of 345 exotic trees (the majority being pest species) at Ōwairaka / Mt Albert is part of the Tūpuna Maunga Authority's wider cultural restoration plans for the Tūpuna Maunga.

11. As youth climate campaigners, Generation Zero supports this plan as part of our commitment to promoting biodiversity and connecting native ecological networks among maunga.

12. Generation Zero believes the group at Ōwairaka who are protesting the Tūpuna Maunga Authority's plans are misguided. The protestors are misguided in using the climate emergency to justify saving mature exotic trees from being removed.

13. Tree removal may remove carbon storage, but the stores that are being removed are being replaced 37 fold in the form of native trees. In addition to regenerating the native ecology of the maunga, their youth means they will also sequester more carbon dioxide compared to mature trees. Without indigenous wisdom and leadership, there can be no climate justice.

14. Also, we are aware of the Authority's plans for mass plantings of native trees across all the Tūpuna Maunga, some 75,000. Generation Zero fully supports this initiative.

15. Additionally, this protest undermines and disrespects the authority of the Tūpuna Maunga Authority to make decisions about the care of the maunga on behalf of Mana Whenua.

16. Generation Zero is committed to honouring Te Tiriti o Waitangi and recognising Tūpuna Maunga Authority as kaitiaki of the maunga. We tautoko the Tūpuna Maunga Authority as the best group to make decisions about the future of the maunga: spiritually, culturally, and environmentally.

17. We firmly believe that climate justice must involve indigenous leadership, and in this case in Aotearoa, that involves upholding the tino rangatiratanga of tangata whenua.

18. Although increasing biomass is one way of addressing existing atmospheric carbon, Generation Zero's goal is ultimately to reduce Aotearoa's carbon

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emissions. We seek to achieve this by advocating for climate-responsive legal frameworks, actionable plans and campaigning for urban development and infrastructure that is conducive to a zero carbon future. We believe the Authority's plan are in full alignment with a zero carbon future for Aotearoa, and support them wholeheartedly.

AFFIRMED by **ANA RENKER-DARBY** at)
this 22nd day of January 2020)
before me:)

ARD

A RENKER-DARBY

OManning

A solicitor of the High Court of New Zealand

OLIVIA MANNING
SOLICITOR
AUCKLAND