

Submission on

'Proposed amendment to the Tūpuna Maunga o Tāmaki Makaurau Integrated Management Plan'

(adopted 23 June 2016, with additions 9 March 2022)

to MaungaAuthority@aklc.govt.nz

From Tom Ang, tomang@orcon.net.nz, resident of Auckland

1. *Ko Waitematā toi whenua, Ko Tāmaki Makaurau tōku kainga, ko Ngāti Awa ki te Atua o te Atua tōku iwi, ko Te Tawera tōku hāpu, ko Tom Ang toku ingoa.* I have pursued life-long studies in natural history, ecology and entomology. My academic background is in philosophy and photography. I have taken courses on native New Zealand botany at Waikato University and in *rongoā Māori*.
2. I wish to present in person to the Hearings Panel.
3. On the evidence of procedures followed, the past handling of 'consultation' and unaccuracies in the papers under review, it is my view that the Tūpuna Maunga Authority's (TMA) submission process for its Integrated Management Plan (IMP) Amendments is flawed in respect of (a) governance, (b) its duties under Statute and (c) of *tikanga*; and it appears to be rigged for pre-determined outcomes. My submission, although provided in the hope that TMA will give due and properly serious consideration to my comments, are given here and throughout without prejudice.

Executive summary: *I do not support the proposed amendment to the TMA IMP because they fall short of addressing the inadequacies of the original IMP, instead perpetuating poor guardianship, maintain socially divisive objectives and continue to waste rate-payer money.*

4. According to the TMA Integrated Management (IMP) Plan: *Maunga tū Maunga ora, Maunga ora Tāmaki ora* – If the Maunga are well, Tāmaki Makaurau is well. That *whakatauki* is not traditional. It has been manufactured for the convenience of TMA that in practice is a betrayal of *kaitiakitanga*. The traditional *whakatauki* is: *Ka ora te Whenua, ka ora te tangata* – If the Earth is healthy, the people are healthy. This teaches that caring for the *whenua* is the first priority; everything else must be measured against this. The TMA's actions in destroying numerous trees on three *maunga*, the irresponsibly high attrition rates seen in its plantings, the inadequacy of its planting policies all add to a sad betrayal of the *kaupapa* it claims to espouse.

He kaha ake te mahi i ngā kupu – Actions speak louder than words. The TMA's tree destruction actions on Mangere, Mangarei and Ohuirarangi have

led to erosion, slope collapse, habitat destruction, loss of way markers for bird transit, resulting the need to poison the land to control weeds is so clearly demonstrate a flawed and failed methodology it would be criminally a dereliction of duty for TMA to continue as it plans.

This is so important, allow me to repeat myself: the TMA plans for widespread tree destruction on other *maunga* are so obviously and demonstrably harmful to the Whenua, a betrayal of all the *kaitiaki* of birds, plants and other life on the maunga entrusted to the care of the TMA it cannot be permitted to continue.

From first principles, from its own avowed *kaupapa*, from every evidence- and practice-based ecological and aboricultural perspective, the TMA's plans for extensive and sudden tree destruction over Auckland are indefensible, are without foundation in either *matauranga Māori* or science and ultimately are self-defeating.

I do not support the IMP Amendment plans for swift removal of trees from the *Maunga*.

5. Since 2014, the TMA under the rule of its Chair, has presided over a tragically missed opportunity through mishandling of key relationships and persistent refusal to engage in meaningful ways to give serious consideration – in breach of its duties under the Reserves Act – to expressed views of the community regarding its plans.

As places 'reverred by all peoples for their multiple layers of cultural, natural and built heritage' (IMP §4.10) the TMA could have led the community – all the peoples of Auckland – to celebrate the city and the country's shared love and appreciation of the *maunga*. They could have been the focus of a *wairua* that unite, invigorate and give life to all Aucklanders' links with each other through a shared love of *ngā maunga*, centres of peace, re-connection, *ko Papatūanuku e takato nei*, and unification of all races.

Instead, TMA led by its Chair has retrograded the maunga from places reverred by all peoples back to *kauhanga riri* – turning them into sites of war, hastily erected stockades to be stubbornly defended against imagined foes, centres from which to fling divisive rhetoric.

The words of the former deputy chair "Future individual maunga plans will provide an opportunity for us to work closely with the Local Boards and diverse communities to produce plans that capture and enhance the unique qualities of each maunga" now ring hollow in the face of the demonstrable refusal of TMA to engage Local Boards or community.

The scale of this entirely avoidable tragedy must be measured against the fact that in its fatally flawed attempt to correct the past with the present, TMA are losing the future. In its attempt to correct the injustices of the past, the TMA is committing the cardinal error of creating new wrongs: TMA is destroying the most innocent that give so much succour and joy to all. TMA wishes to

massacre the *tane tūpuna, ngā tamariki a Papatūanuku* – the ancestral trees, children of Papatūanuku – for superficial, short-term gain thus ensuring long-term disaster.

I do not support the IMP Amendment as it fails to address social divisiveness created by TMA policies and handling of community relations.

6. The IMP Amendment is a hastily concocted document attempting to defend the indefensible. The entire exercise is one of futility in attempting to shore up a profoundly flawed and groundless decision (removal of certain trees) that was made without debate of any documented kind by person or persons unqualified to make them and that subsequently have not been supported either by *matauranga Māori*, basic *kaitiakitanga* or science. The quality of research, the hasty presentation, the poor accuracy and the evidence of lack of knowledge indicate an Authority not in full grasp of its responsibilities to operate to the highest standards of probity. For example:

(1) The draft Strategies document for Ōwairaka was not released for public comment until 6 July 2019 – on the TMA agenda for Hui 49, 5 August 2019, with approval of TMA members at Hui 50 on 25 September 2019. Yet Resource Consent for the removal of 345 trees was granted four months earlier, on 24 February 2019. None of the trees in the 2018 reports on which the Resource Consent relied were assessed according to the criteria in the September 2019 Strategies document. At best, this is procedurally inept, but other interpretations are available.

(2) The IMP Amended asks for comments on a new section 10 and appendices. However the IMP as Amended carries a new Chair's Introduction. This in itself is a material omission. The fact that this Introduction sets out a substantive agenda that amounts to a divisive programme aimed at proclaiming TMA's total control over the maunga makes its absence from the list of amendments to be commented highly egregious and misleading. In particular, the Chair writes: "It was through the *manaakitanga* (care and generosity) of the Auckland tribes with their Treaty settlement that the Tūpuna Maunga have been shared with all peoples."

The Chair's statement is inaccurate to the point of being deliberately misleading.

It is known from the correspondance between Crown, Auckland Council and negotiators leading to the final draft of the Collective Redress Act that the Crown's intention was to ensure 'all the peoples of Auckland' continued to enjoy access to the *maunga* but it was the negotiators for *iwi* who insisted on the crucial change of the phrase to '*mana whenua* and the other peoples of Auckland'. This wording, according to Auckland's Counsel at the time, was likely to be seen to be divisive.

The separation of the Chair's Introduction from other material offered for public comment is a material omission. Therefore I do not support the IMP

Amendment.

7. A tenuous grasp of botany and ecology is demonstrable throughout much of the TMA's decision-making, its statements, and operational plans. For example:

(7)(a) Court papers show that no depth or extent of consideration, debate or consultation with the community went into the initial policy to remove non-native trees. No research, no consideration of holistic effects such as the cumulative loss of thousands of trees across Auckland would affect ecology, no analysis of the cumulative effect of near-simultaneous destruction. The decision for extensive tree removal goes far beyond the 'routine management' envisaged in the annual operational plan (also IMP Amendment (10.4)) yet it was reached behind closed doors, foisted on Auckland Council, slipped through as non-notified Resource Consents and any questions have been ignored or dismissed on various irrelevant grounds.

(7)(b) The Amendment seeks to create an 'exemplar WF7 Pūriri ngahere' (in fact that is a WF7.2 system) on Ōwairaka. TMA is apparently unaware nearly two hundred trees – *Pōhutukawa* (*Metrosideros exelsa*) and *Tōtara* (*Podocarpus totara*) on Mt Albert are not dominant or typical of WF7.2 rock forests. Yet the planting plan proposes some 150 *Tōtara* that are only occasional in a WF7.2 system.

(7)(c) TMA is careless about the designation of plant pests. In several places, TMA refers to certain trees as 'weeds' or 'weed species' in relation to the Regional Pest Management Plan (RPMP) yet 'weed species' is not a term used in the RPMP.

(7)(d) TMA has chosen to ignore the fact that certain cherry cultivars have received an exemption and should be removed from immediate consideration until end 2030.

(7)(e) There are material inconsistencies between various TMA reports as to the number of trees to be removed from Ōwairaka – some say 345, others say 298. This further indicates hasty, imprecise operational management that – when TMA is responsible for the enormous value of trees as ecosystem resources, holders of amenity values and stores of carbon capital – are indicative of lax stewardship and *kaitiakitanga*.

I do not support the IMP Amendment because of material inconsistencies, inaccuracies, and unsound assumptions.

8. The TMA's failure to produce Individual Maunga Plans in breach of its duties under the Reserves Act, its monolithic policy of non-native tree removal are evidence that its claim to make ecological restoration is entirely untenable. The TMA's pretence that removing hundreds of mature trees is of such minimal effect that Resource Consents can proceed non-notified prove a deplorable lack of respect for the *maunga* and the life they sustain, as well as a disdain for the communities who value the *maunga*. These failures, some

established in the Appeal Court, were evident in the IMP and operational plans, but are nowhere tackled in the IMP Amendment.

(8)(a) Throughout its documents, plans and reports the TMA counts one 3m tall sapling as one tree that is equal to a 150-year old tree with 30m diameter crown; that large mature specimen is merely another tree. This is manifest nonsense and against all commonsense. Measured against physical size and weight, against carbon sequestration and oxygen production, against eco-system services such as water retention/detention, wind and light moderation, against amenity values: a large mature tree cannot be replaced by even hundreds of stem plantings. That TMA takes this view demonstrates a negligent attitude to the rich, varied and self-regulating *ngahere* that exists on the *maunga* around Auckland. It is a gross betrayal of *kaitiakitanga*, abysmally disregarding the true values of all *rākau*, *ngahere*.

(8)(b) Repeatedly, in its documents, press releases and interviews, TMA attempts to suggest that its planting plans will clothe maunga in forests. This is demonstrably misleading and false. In large part, the plantings are of monocot species and low shrubs, with no specimen trees. Such trees that are planted are mound-planted with little to no mulch, do not follow best practice and as a result almost all die within a year. In the 50-100 years that is needed for a forest to develop, one can expect attrition rates to be well-nigh 100% yet there are no plans for further plantings. The density of planting also falls far very short of normal forestry practice (100,000 compared to the 13,000-odd of TMA plans.)

The evidence of failure is visible to any visitor to TMA plantings. The IMP Amendments could have offered improvements in this area of operations but do not. Indeed, the Amendments perpetuate the myth that the plantings are 'maturing well' when in fact the attrition and mortality rate are far above acceptable, and tantamount to negligent waste of public funds, and of public trust.

I do not support the IMP Amendment plans.

9. There are inconsistencies between proposals passed in Hui 77 regarding amendment of the IMP and the amendments presented for consultation. This includes the proposal to remove native as well as exotic trees, the omission of certain Individual Maunga Plans and it remains the case that non-notified Resource Consents obtained are not compliant with the Biodiversity Strategy of 25 September 2019. The issue at governance is whether or to what extent the variations between proposals passed by TMA and documents now published were fully considered by TMA.

Furthermore, the IMP approved on 23 June 2016 states that review will take place every five years i.e. it was due in June 2021 but there is no review. No reason for the delay is available.

The new section 10 of IMP Amendment signally and significantly fails to offer an improvement in community engagement or any willingness to engage or

consult with community, with all the peoples of Auckland. With its emphasis on sole TMA determination of numerous policies, it is a dismal failure of inclusiveness, as a result it is profoundly divisive.

I do not support the IMP Amendment.

10. The division between native and non-native tree is arbitrary, with scant foundation in science or *matauranga Māori*. A tree is not only the trunk and branches and leaves that are visible, but the life underground that is invisible, and the small life-forms too small to see easily that live throughout the tree. Without these elements the tree could not exist, they sustain its *mauri*, the balanced *wairua* of all the elements is essential to give each tree, each grass-blade, each bird its life.

I have personally sampled top soil and bark from around Ōwairaka and examined the micro-fauna under a microscope. One of the commonest hexapods belong to the genus *Onychuridae* which was recognised by the Collembola authority JT Salmon as a European genus that is locally abundant in New Zealand. Every sample taken from many Ōwairaka locations contained several *Onychurus* individuals. All trees on all *maunga*, without distinction, depend on these hexapods as well other micro-fauna and mycorrhizal fungi for their well-being.

One of the fundamentals of ecological restoration is respect for the specific topography, hydrology, geology, history and climatic niche. But, in its obsession with removing 'non-native trees' TMA is riding rough-shod over this basic commonsense shared by both European science and *matauranga Māori*. TMA appears to ignore the difference between a native bush section threatened by privet with a landscape that has been highly altered for centuries from its original mixed podocarp laval field forest. It is folly to believe that the *maunga* can be returned to rock forests by first destroying half the tree cover under which is a century of healthy native regeneration. The IMP Amendment offers no corrective to this policy despite years of scientifically based opposition from the community.

I do not support the IMP Amendment plans.

11. In conclusion, I wish to express my sadness and regret that TMA has failed to address the issues raised by many people of Auckland over several years regarding the original IMP and the subsequent operational plans. TMA's policy of slipping major tree removal as non-notified Resource Consents also badly erodes trust. In fact the evidence is that attempts by the community to be considered seriously have been rebuffed at every turn. Despite losing a major court case and TMA's known record of ignoring sustained opposition from the community despite numerous attempts by the community to enter into dialogue, no attempt to improve community relations is evident in the IMP Amendment.

I do not support the IMP Amendment plans.

12. It remains for me to thank the Independent Panel for the opportunity to put my views, for its attention and to call on the TMA to enter into genuine dialogue with all peoples of Auckland, as required by statute, but really because to do so would be *tika*, it would enhance the *mana* of all on the TMA, it would prove that *aroha atu, aroha mai*, for the maunga could turn from hills of war and stockades to become peaks of peace, mutual trust and, above, all, *pāhautea whenua*.

*Ko Ranginui e tū iho nei
Ko Papatūānuku e takoto nei
Tuturu whakamaua kia tina!
Whano, whano! Haramai te toki!
Haumi ē! Hui ē!
Tāiki ē!*

//whakamatunga