



Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

Forest & Bird Hearing notes for Te Tai o Poutini One Plan Hearing Panel

21 November 2024

Topic: Ecosystems and Indigenous Biodiversity (Hearing 18-22 Nov)

By Email: chu.zhao@wrc.govt.nz and info@tpp.govt.nz

Introduction

1. Forest & Bird made a submission (S560) and a further submission (FS34) on the Te Tai o Poutini One Plan (TTPP). Forest & Bird's key concern is the protection and maintenance of indigenous biodiversity under the Resource Management Act 1991 ss6c and ss 31 (1)(b)(iii); the National Policy Statement for Indigenous Biodiversity (NPSIB); and the West Coast Regional Policy Statement (WCRPS) and how these provisions are given effect to Te Tai o Poutini One plan.
2. Forest & Bird has also provided legal submissions addressing the relevance of the NPSIB and the WCRPS in support of its submission. Forest & Bird provided a further submission in support of the Department of Conservation submission. We have considered section 42A officers report amendments and the legal submissions and the expert evidence (planning and ecological) for the Minister of Conservation. We have sought to identify where we consider that additional or different amendments are required to address Forest & Birds submission.
3. Forest & Bird is grateful for the opportunity to present on the Ecosystems and Indigenous Biodiversity topic. Forest & Bird will comment on several definitions, as well the Introduction and provisions within the Ecosystems and Indigenous Biodiversity chapter.

Definitions

“SNA or Significant Natural Area” and “Area of Significant Indigenous Biodiversity”

4. Forest & Bird's submission (para 4.10(d)) sought that the TTPP “use the definition of Significant Natural Area from the WCRPS, remove additional definitions and terminology, and use the defined term throughout the Plan” and sought to delete the definition “Area of Significant Indigenous Biodiversity.”
5. These submissions were rejected in the s42A recommendations.
6. Forest & Bird maintains that its relief sought is appropriate. The NPSIB definition is worded such that any area meeting the criteria in Appendix 1 or 2 of the WCRPS is an SNA in terms of the NPSIB. As explained in our legal submissions the NSPIB is relevant to the proposed plan which was notified before the Resource Management (Freshwater and Other Matters) Amendment Act 2024 (the RMAA).

7. We understand from the evidence of Dr Marshall [18] that the WCRPS and NPSIB criteria are equivalent and we agree with Mr Brass [38] that the definition of SNA in the TTPP should be valid using either criterion. However, we do not agree amending the proposed TTPP definition as recommended by Mr Brass. That would not give effect to the WCRPS as only areas where an assessment has occurred would be considered significant under the TTPP.
8. To address Mr Brass's point about the relevance of the NPSIB criteria, we suggest adding a note below the WCRPS definition which Forest & Bird seek to be used in the TTPP. The note could state that the NPSIB Appendix 1 criteria can be used as an alternative to that in the WCRPS.
9. Alternatively, as set out below, a more comprehensive definition could be used to provide for consistency with the NPSIB and recognise that the intent is for district wide assessment to include mapped areas meeting the NPSIB criteria in the TTPP, This definition is intended to capture clause (a) of the NPSIB definition as it applies through implementation of Policy ECO-P1 and clause (b) of the NPSIB which until (a) is achieved applies the WCRPS definition and captures TTPP Grey District Schedule Four areas.

SNA or Significant Natural Area means

(a) any area that is notified or included in the TTPP following an assessment in accordance with Appendix 1 of the NPSIB; and

(b) until (a) has been achieved through district wide assessments and mapping in accordance with Policy ECO-P1, also means:

(i) an area of significant indigenous vegetation, and/or significant habitats of indigenous fauna which has been identified using the criteria listed in Appendix 1 or 2 of the WCRPS and included on maps of this Plan or a regional Plan; or

(ii) an area which although not included on maps (or in Schedule 4) in the TTPP or a regional plan nevertheless meets one or more of the criteria listed in Appendix 1 or 2 of the WCRPS; and

(iii) an area identified in Schedule Four of this Plan.

Note: that the NPSIB Appendix 1 criteria can be used as an alternative to that in the WCRPS

“Cultural harvest”

10. As this term was used in the ECO chapter, but not defined, Forest & Bird's submission sought to include a clear definition that ensures the harvest is done in a way that biodiversity values are protected.
11. The s42A recommends the following definition:

Cultural harvest means indigenous vegetation clearance for cultural use and in accordance with tikanga and Kaitiakitanga, mahinga kai, collection or mining of Pounamu, Aotea stone or rock where this is undertaken by

Poutini Ngāi Tahu. This includes clearance of vegetation by Poutini Ngāi Tahu for the maintenance of Poutini Ngāi Tahu land.

12. Forest & Bird is supportive of the first aspect of the definition, this gives effect to the WCRPS. However, we do not support the second sentence for clearance of vegetation for the maintenance of Poutini Ngāi Tahu land, being included in this definition.
13. We understand these words were included in response to Te Rūnanga o Ngāi Tahu submission, which sought to include “clearance of vegetation for maintenance of cultural redress land” into the definition of Poutini Ngāi Tahu Activities.¹ Forest & Bird agrees with the initial concerns of the s42A officer [79] that the wording is unclear. However, we do not agree this is resolved by consideration of clause 3.18 of the NPSIB and the alternative wording “of Poutini Ngāi Tahu land” recommended by the s42A officer. In particular Forest & Bird is concerned that what may be considered “clearance of vegetation... for the maintenance of...land” is uncertain and is not appropriate for a permitted activity (at least not without further clarification and limits). It is unclear what effects may arise from clearance for this purpose. For example, under Permitted Activity ECO-R1 which includes indigenous vegetation clearance for “cultural harvest” there are no requirements to “avoid, remedy or mitigate adverse effects on SNAs and identified taonga” (3.18(2)(e)). Nor is it clear whether such clearance under this rule would maintain indigenous biodiversity and protect SNAs on specific Māori land (clause 3.18(1)(a) and (b) NPSIB).
14. While it may be appropriate to provide for such clearance in certain circumstances, we consider further information is needed, a separate definition and appropriate limits/standards.
15. Forest & Bird is concerned that this activity goes beyond what would otherwise be considered “cultural harvest” subject to tikanga and Kaitiakitanga “and seeks that the sentence is removed from the definition.
16. Forest & Bird also sought changes to other definitions which have not been accepted by the ECO s42A reporting officer. We remain of view that these definitions should amended for the reasons set out in our submission.
 - a. **“Activity”** F&B sought: Delete
 - b. **“Conservation activities”** – F&B sought: Amend to limit the definition with respect to natural and ecological values, to activities aimed at restoration of ecosystem health and indigenous biodiversity.
 - c. **“Existing buildings and structures”** F&B sought: Replace “existing buildings and structures” with “lawfully established” in the Plan. Delete this definition and combine with the “lawfully established” definition as follows: ... Note that this relief also relates to “Activity” above.

“Indigenous vegetation clearance”

17. DOC sought to include “mob stocking” which was supported in the s42A officer report [71] but does not appear to be included in Appendix 1. Forest & Bird supports this amendment.

¹ Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu also sought other changes including adding “Cultural Harvest” into that definition.

18. F&B sought to amend the definition to define “vegetation clearance” and that “indigenous vegetation clearance has the same meaning as it applies to native vegetation” to provide for protection of habitat values in significant areas which may rely on exotic vegetation.
19. F&B is pleased to see the inclusion of “destruction” and “smothering” in the definition. However, we remain concerned that without restrictions on clearance of exotic vegetation in significant natural areas, the plan provisions are inadequate to implement the Councils responsibilities for the protection of those areas.

“Indigenous Vegetation”

20. F&B sought: “Indigenous vegetation” means vascular and non-vascular plants that are native to the ecological district.
21. Forest & Bird is generally supportive of the new definition recommended by the s42A reporting officer, which is similar to that sought and to the NPSIB definition:
 - a. means vascular and non-vascular plants that, in relation to a particular area, are native to the ecological district in which that area is located

Biodiversity compensation and Biodiversity offset

22. Forest & Bird is generally satisfied with the changes recommended by the officer for definitions of Biodiversity offsetting and compensation which align with the NPSIB. However, how these are to be considered within provisions needs to be in accordance with achieving Chapter 7 Policies 2-6 of the WCRPS.

Ecosystems and Indigenous Biodiversity chapter

Objectives

23. Forest & Bird’s submission on the objectives has not been addressed by the recommendations of the S42A report. In particular we consider that in ECO-O2 the words “or enhance” must be deleted. As currently worded, this is inconsistent with s6(c). Our other concerns remain as set out in our submission.

Policy ECO-P1

24. Forest & Bird is generally supportive of ECO-P1 setting out an approach and timeline for the assessment, identification and mapping of SNA’s across the three districts. However, we consider that the approach towards indigenous vegetation clearance before a site assessment has been undertaken needs to be clearer. For example it is not clear how assessed sites will be identified prior to notification of a Plan Change to apply the direction in ECO-P1 (5) or (b).
25. We are also concerned that policy ECO-P1 provides no direction for a case-by-case assessment, for example where a landowner seeks consent before the process set out in Policy 1 occurs.
26. Additionally, as set out in our submission and with respect to indigenous vegetation clearance rules below, Forest & Bird considers that a “general vegetation clearance rule” is not appropriate prior to the assessment and identification of SNA’s in the Plan and is not appropriate within identified SNA’s.
27. Forest & Bird suggest amending the s42 recommended ECO-P1 as follows:

*ECO-P1*A. Identify areas of significant indigenous vegetation and fauna habitat....

1. The criteria
2. In the Grey ...
3. Region – wide ...
5. Until a Plan Change has been notified for identified Significant Natural Areas to be included in Schedule Four site has been assessed as to whether it contains a Significant Natural Area a general restrictive indigenous vegetation clearance rule will apply to that site.
6. Once a site has been assessed and a Plan Change notified to identify Significant Natural areas on that site or for the District, a less restrictive general vegetation clearance rule will apply to other indigenous vegetation on that site that is outside of any identified the Significant Natural Area.

B. Prior to a Plan Change being notified to identify Significant Natural Areas under A above, protect significant natural areas meeting the criteria in Appendix 1 of the WCRPS by:

1. enabling indigenous vegetation clearance necessary for the operation and maintenance of lawfully established buildings, structures and infrastructure where adverse effects are no more than minor; and
2. for other indigenous vegetation clearance requiring an assessment in accordance with Appendix 1 of the WCRPS or the NPSIB to ensure that adverse effects can be appropriately avoided, remedied or mitigated to protect significant values and otherwise maintain indigenous biodiversity.

Policy ECO-P2

28. Forest & Bird supports the s42A amendment changing “Allow” to “Provide for. However, in another respect, the concerns raised in Forest & Bird’s submission on this policy have not been addressed by the s42A recommendation.
29. Forest & Bird has additional concerns with other s42A amendments to this policy, including that:
 - a. Only certain aspects of the NSPIB have been included, for example there is no requirement for “no practical alternative”² with respect to activities identified under (b);

² Clause 3.11(1)(c)

- b. Does not ensure that all activities will be undertaken in a way that does not cause the effects identified in Chapter 7, Policy 2 of the WCRPS.
- c. Does not ensure that the adverse effects which must be avoided under Clause 3.10(2) of the NPSIB (while it may be intended that activities under this policy meet the exceptions in 3.11 of the NPSIB this is not with respect to (a) as there is no direction to apply this to “specified” established activities or to identify such activities in the policy.
- d. While the first sentence of the policy is that activity would have no more than minor effects, Clause (d) includes activities that are likely to have a greater level of effects. It is not clear how managing in accordance with the effects management hierarchy would ensure effects of these activities are no more than minor.
- e. That the effects management hierarchy is relevant for all activities adversely effecting indigenous biodiversity, not just clause (d) and not just in significant natural areas.
- f. That reference to the effects management hierarchy relying on the definition is inadequate to ensure that applicants demonstrate how each step of the effects management hierarchy will be applied.

Policy ECO-P3

30. Forest & Bird supports the s42A amendment changing “Allowing” to “Providing for” and the addition of clauses (f) and (g). We consider that the term “enhancement” is inappropriate and seek that a clause is added to provide direction for subdivision for the reasons set out in our submission.

Policy ECO-P4

31. Our concerns with ECO-P4 are set out in our submission. If the Chapter 7 policies 2 to 6 of the WCRPS are reflected in other policies we would consider it is not necessary to include within ECO-P4.

Policy ECO-P5

32. Our concerns with ECO-P5 are set out in our submission. If the Chapter 7 policies 2 to 6 of the WCRPS are reflected in other policies we would consider it is not necessary to include within ECO-P5.

Policy ECO-P6

33. Forest & Bird remains concerned that this policy does not accurately give effect to Policy 2 of Chapter 7 of the WCRPS.

Policy ECO-P7

34. Our concerns with ECO-P7 are set out in our submission. In particular it is not clear that the requirement of Policy 2 Chapter 7 of the WCRPS needs to be met.

35. As this policy will apply prior to the identification process under Policy ECO-P1 being completed we consider direction on the adequacy of any assessments applying the Appendix 1 criteria needs to be included in ECO-P7 as sought in our submission.
36. While we are satisfied with the Biodiversity offsetting and compensation requirements of the NPSIB being referred to instead of those in the WCRPS, we are concerned that the direction in clause (k) is misleading. This is because Policy 9 does not set out any direction with respect to the “appropriateness” of these measures. In this respect we consider that new clause (l) on net gain, may fit better within Policy ECO-P9. We consider that a clause should be added to Policy ECO-P7 recognising that there are limits to offsetting, and if not already addressed in the policy (as sought by Forest & Bird’s submission), this should include the matters to be avoided under Chapter 7, Policy 2 of the WCRPS.
37. The s42A recommendation to refer to the effects management hierarchy, without setting it out in policy is inadequate.
38. Nor is it clear that:
 - a. For any new subdivision, use of development (except as provide for in clause 3.11 of the NPSIB) the adverse effects set out in clause 3.10(2) of the NPSIB must be avoided; and
 - b. An applicant would have to demonstrate that the steps of the effects management hierarchy have been met.
39. These matters need to be set out in the ECO policies to give effect to the NPSIB and the WCRPS, and to ensure that consent applications are appropriately assessed. They provide clear direction as to limits for adverse effects including with respect biodiversity offsetting and compensation.
40. Clear policy direction is particularly important where section 104D must be met for any non-complying activity.
41. Forest & Bird is concerned that there appears to be little direction how adverse effects are to be addressed to avoid, remedy or mitigate adverse effects for the maintenance of indigenous biodiversity outside of significant natural areas.

Policy ECO-P9

42. Forest & Bird is generally supporting of the policy relying on the NPSIB criteria for Biodiversity Offsetting or Biodiversity Compensation. However, we consider that unless a direct conflict exists between the NPSIB and the WCRPS, the requirements in Policy 2 in Chapter 7 of the WCRPS must be met.

Policy ECO-P10

43. Forest & Bird’s submission sought changes to ECO-P10 for consistency with the NZCPS. This has been accepted in part in the S42 Report. Forest & Bird’s amendment to include “avoiding significant adverse effects” in clause (b) of the policy has not been accepted. Having considered the officers recommended wording, further amendment is required to clarify the effects to which Policy 11(b) applies. This will also provide consistency with the wording approach used in clause (a) of the policy referring to Policy 11(a) of the NZCPS.

c. Avoiding, remedying or mitigating other adverse effects on coastal indigenous vegetation, dunes, estuaries, wetlands, habitats and species within the coastal environment in accordance with the effects management hierarchy and by avoiding significant adverse effects, avoiding, remedying and mitigating other adverse effects on indigenous biodiversity in accordance with Policy 11(b) of the NZCPS.

ECO Permitted Activity Rules

44. Forest & Bird has reviewed the evidence of Mr Brass for DOC and agree with a number of his concerns on the permitted activity rules³. However, we do not agree with the D-G or Mr Brass's recommended rules which would allow for clearance up to a maximum area limit.
45. Given that a comprehensive survey has not been undertaken to map SNAs and include them in the TTPP and the potential for Indigenous vegetation to meet the WCRPS and NPSIB criteria, Forest & Bird seeks that a resource consent process is needed for Indigenous vegetation clearance other than for specific purposes and within limits.⁴
46. Forest & Bird consider that a general vegetation clearance rule for clearance outside of SNAs which would apply once SNA assessments and mapping has been completed, could be included in the plan now. Such a rule should be limited to clearance for specific purposes and have appropriate limits to meet Council's functions for maintenance of indigenous vegetation under the RMA s31. The rule would also need to be clear when it applied i.e. Would it apply on a property-by-property basis if someone decided to get the SNAs on their property assessed ahead the Council doing district wide assessment or only after assessed and mapped SNAs are added to the plan? However, we would not support such a rule applying within the Coastal Environment given the directive requirements of the NZCPS.

Rule ECO-R1

47. Forest & Bird remains of the view⁵ that, until a comprehensive assessment to map significant natural areas and include those into the TTPP has occurred, any permitted activity for indigenous vegetation clearance must be relatively stringent.
48. Forest & Bird considers that a consenting requirement must apply to ensure an appropriate assessment against the SNA criteria, until the plan is updated to include mapped SNAs in accordance with the WCRPS and NPSIB

Rule ECO-R1A

49. Forest & Bird supports the evidence of Mr Brass⁶ and agrees that this rule should be deleted.
50. As set out in our submission, any indigenous vegetation clearance at the permitted activity level, prior to a full assessment of SNAs across all three Districts, should be limited to specific purposes

³ Paragraphs 104 to 112, ECO topic evidence of Mr Brass, 29 July 2024

⁴ See key issue 4 of Forest & Birds submission.

⁵ See paragraph 4.7 and the Reasons and Decision sought for ECO-R1, in Forest & Birds submission on the proposed TTPP

⁶ Paragraphs 116, ECO topic evidence of Mr Brass, 29 July 2024

and within limits to ensure adverse effects are no more than minor, as if the activity were within an SNA.

Rule ECO-R1B – Indigenous Vegetation Clearance within a Significant Natural Area

51. This is a new rule added by the s42A reporting officer. Based on the definition of Significant Natural Area supported by the officer, this rule would apply to areas that have been assessed as significant or identified as Significant Natural Areas within a Regional or District Plan.

52. This rule is uncertain as to how it applies to “assessed areas” that are not identified within the plan.

53. In terms of the rule standards recommended by the s42A for ECO-R1B, we consider clauses 2, 3, 4 and 5 (noting that we support the amendment recommended by Mr Brass to condition 5) are generally acceptable for a permitted activity rule.⁷ Although we are uncertain on how the “approval” in condition 2 is intended to work.

54. However, we have a number of concerns with standard 1. For example:

- a. The inclusion of “established activities” without specifying these activities means that the council cannot be certain that the clearance from these activities does not result in the loss of extent, or degradation of ecological integrity, of an SNA.⁸ Nor is it clear how council would be able to enforce clause (a). We recognise that Clause 3.15(2) of the NPSIB provides direction for local authorities with respect to established activities, but that is for *specified* established activities. That direction requires an assessment to be undertaken by the council to include relevant plan provisions that enable *specified* established activities to continue where effects on the activity on the SNA are acceptable in terms of Clause 3.15(2) (a) and (b). These requirements of the Council are not achieved by Standard 1 as drafted. We suggest the following amendment:

1. For the maintenance, operation and repair of lawfully established activities buildings and structures including tracks, fences, drains, structures, infrastructure and renewable electricity generation activities where:

a. ~~This is at the same or similar scale, character and intensity as at 14 July 2022;~~ and

b. ~~The clearance is within 3m of the lawfully established activity building or structure and clearance is limited to a maximum area of 50m² per individual SNA;~~

55. Forest & Bird agrees that there may be circumstances where some vegetation clearance can be permitted within an SNA.

⁷ Please note that Forest & Bird’s preference is for the relief sought in its submission as set out with respect to Rule ECO-R1.

⁸ Clause 3.15(b) NPSIB and Policy ECO-P2

56. However, as drafted we consider the rule it not appropriate. Not only is it unclear when the rule applies, it is also unclear to which activities or for which purposes it applies.
57. Forest & Bird has set out the purposes and limits it considers appropriate in its relief sought for ECO-R1.

Rule ECO-R2

58. Forest & Bird considers that the s42A makes some improvements, in particular adding “and” between standards so that all standards must be met. However, we have a number of concerns with respect to the purposes of activities under Standard 5 and that by including this standard last, rather than first, the rule may be misread as a rule allowing 500m² per site in any three-year period.
59. Forest & Bird considers that Standard 5:
- a. clause (i) is problematic for the same reasons as discussed with respect to “established activities” at Rule ECO-R1B above.
 - b. that clause (i), (iv) and (v) should be limited a specified the width of clearance (as set out in Forest & Bird’s submission on ECO-R1 and ECO-R2).
 - c. That clause (iv) should be clarified to limit such fencing to where indigenous vegetation will be protected and restored. For example, on the current wording a new fence could be constructed to exclude stock from indigenous vegetation which could subsequently cleared for other purposes under Standard 5.
 - d. Standard 5. clause (ix) should not apply to subdivision approved after the plan becomes operative as such clearance should be a matter included in the subdivision consent. This is explained in our submission (Reasons ECO-R2, Condition 1(iii) last paragraph and relief 6.).
 - e. Forest & Bird is concerned the inclusion of Standard 5. clause (x) could result in the clearance of significant indigenous biodiversity as SNAs have not been comprehensively identified.
60. Forest & Bird is concerned with the inclusion of the standard for “improved pasture” added to these permitted activity rules. While the standard (s) wording limits clearance to that purpose and to removal or clearance of manuka, kānuka and bracken only we are concerned that it could be read to apply to clearance for that purpose more broadly including within significant natural areas that are not yet mapped in the plan. We consider that until an SNA survey has been completed the term “improved pasture” should not be used in the plan. The standard should also be reworded to improve interpretation:

It is for the purpose of maintaining lawfully established ~~maintenance of~~ improved pasture for farming and involves and is limited to the removal or clearance of manuka, kānuka and bracken only that is:

(a) less than 15 years old ~~not part of any wetland~~ and

(b) which is not part of any wetland ~~under 15 years old~~; or

Eco Controlled Activity Rules

61. ECO-R3 - Forest & Bird retains the position set out in its submission.

ECO Restricted Discretionary Rules**ECO-R5**

62. Support. The officer has accepted Forest & Bird's submission but recommended alternative amendments.
63. Forest & Bird is still concerned that the rule could be applied to an area that has not been assessed. This is because there is no requirement for an assessment to be undertaken to meet the rules entry requirement.
64. It is also not clear what adding "at ecological district level" to Standard 2 means or whether the matters of discretion are adequate to consider policies reflecting limits from RPS and clause 3.10 NPSIB for Significant Natural Areas.

ECO-R7

65. Forest & Bird is concerned that the entry criteria for this rule could read as the requirements for granting consent. This is not an appropriate basis on which to determine whether an activity, particularly for areas that are significant, outstanding or High in the coastal environment.
66. The amendments Forest & Bird seeks are set out in our submission.

Subdivision within Areas of Significant Indigenous Biodiversity

67. Forest & Bird generally supports the removal of repeated SUB rules in the ECO chapter. However, we consider that the note to refer to the ECO policies added under SUB-R15 should be added under all of those rules or some other advice provided in the SUB chapter to make it clear that the objectives and policies of the ECO chapter must be considered for these rules (not just SUB-R15).
68. With respect to the changes recommended in the s42A report Forest & Bird is generally supportive and pleased to see the inclusion of some amendments it sought in its submission.
69. Forest & Bird does not agree with the removal of conditions from SUB-R15 discretionary activity, or the deletion of SUB-19 non-complying activity rule, for the reasons set out in its submission.
70. We also have concerns that the removal of SUB-R27 and therefore reliance on SUB-15 as the "catch-all" rule for any other subdivision/creation of allotments is uncertain. This is because SUB-R15 is specific to the creating allotments to contain an SNA whereas SUB-R27 is worded more broadly to capture any subdivision within an SNA. While the reference to "not meeting Rule ECO-R8" is not necessary, we consider that the rule should remain to capture subdivision within SNA's, where the subdivision is not to "create allotments containing an SNA." There is an issue as to whether all subdivision within SNA's would be captured by the scope of the activity descriptions for ECO-R7, R9 and R15.
71. We remain concerned that the use of a different term "significant indigenous biodiversity" creates inconsistency and therefore uncertainty with terms used in the ECO chapter and with the

definition of “SNA or Significant Natural Area” set out in the WCRPS (which is similar to that in the NPSIB).

72. Any subdivision within a significant natural area where it is not intended to protect the significant natural area within an allotment, should be a NC activity status. This activity status better reflects that such activities would not generally be anticipated to occur.

Thank you for the opportunity to present.

Nicky Snoyink

Regional Conservation Manager Forest & Bird

Canterbury/West Coast

n.snoyink@forestandbird.org.nz