

21 July 2022

Ministry for the Environment

8 Willis St

Wellington 6011

Tēnā koutou,

Te Tira Whakamātaki's submission on the Draft National Policy Statement for Indigenous Biodiversity

Te Tira Whakamātaki welcomes the opportunity to provide feedback on the Draft National Policy Statement for Indigenous Biodiversity ("the draft NPSIB"). Te Tira Whakamātaki is committed to protecting our natural heritage through Indigenous-led and Indigenous knowledge solutions. Our team includes mātauranga experts, Māori scientists, policymakers, and kaitiaki. Accordingly, we are making this submission because we believe that the draft NPSIB should meaningfully recognise the integral role of Māori in the management of Indigenous Biodiversity. Our submission does not seek to represent the views or experiences of all Māori but rather provides feedback based on our whakapapa and expertise.

1. We support the development of a National Policy Statement that better enables kaitiakitanga and rangatiratanga of hapū/Iwi/Māori.

We are pleased that feedback provided by hapū, Iwi and Māori organisations has informed the current draft to the extent that policy outcomes relate specifically to hapū/Iwi/Māori. We are encouraged that the Ministry for the Environment ("the Ministry") is adapting its policy processes to better enable Māori co-design and Māori-led approaches. In this response, we offer a few comments to support the Ministry's development of a National Policy Statement for Indigenous Biodiversity that better enables kaitiakitanga and rangatiratanga of whānau/hapū/Iwi/Māori and our relationship with Indigenous Biodiversity.

2. Ensure the careful and respectful use of Te Reo Māori

We are encouraged that there is wider use of Te Reo Māori and Te Ao Māori concepts within the draft NPSIB. However, caution needs to be taken with the translation and use of Te Reo Māori. We encourage the Ministry to avoid translating concepts such as mātauranga Māori (currently translated on page 9), kaitiaki and taonga, given the depth and dynamic nature of these kupu.

It should also be taken as a responsibility by officials, Ministers and councils implementing this plan to learn about the concepts used, including pronunciation. We refer to Rauika Mangai's Best Practice Guidelines for Science Partnerships with Kaitiaki for Research Involving Taonga as a guide to the appropriate use of Te Reo Māori¹.

3. NPSIB needs to demonstrate support for Māori co-design and Māori-led approaches

Te Rito o te Harakeke provides a framework for tangata whenua alongside local authorities to manage indigenous biodiversity. Key to this framework should be the requirement and obligation to work with tangata whenua, rather than "engagement with tangata whenua" which is currently stated in point (f) in Te Rito o Harakeke. We suggest strengthening language throughout the draft NPSIB to allow for Māori co-design and Māori-led approaches.

The draft NPSIB needs to be explicit about tangata whenua involvement in decision-making and should provide leadership on baseline standards across Aotearoa New Zealand. This includes but is not limited to ensuring that resources are allocated to support equitable Māori involvement. For example, section 3.19 requires councils to use "an agreed process" to work with Māori for determining taonga species. This process will require resourcing and guidance to make sure that it is applied meaningfully and consistently. There should also be an acknowledgement that for some hapū/Iwi taonga are all-encompassing instead of a term reserved for specific species. This particular outcome requires considered thought and flexibility for its interpretation by hapū/Iwi/Māori.

The draft NPSIB needs to be co-developed with Māori to meaningfully incorporate Māori co-design and Māori-led processes within the National Policy Statement. There are sections that are not fit for purpose in the absence of such an approach. Another example includes the references to territorial boundaries which are determined by local authorities. The question for the Ministry to consider is "how will the National Policy Statement prioritise iwi/hapū boundaries?" particularly if kaitiakitanga and rangatiratanga are key policy outcomes.

¹ <http://www.rauikamangai.co.nz/wp-content/uploads/2022/06/Wai262-Report-Rauika-Ma%CC%84ngai.pdf>

4. Māori data sovereignty and intellectual property rights should be considered

Local authorities must develop data processes but there is no mention of Māori data sovereignty which will be integral given the use of mātauranga Māori is encouraged by the NPSIB. We recommend greater cross-collaboration between the Ministry and Councils with Māori to ensure Mātauranga Māori is protected and remains the intellectual property of the knowledge holders. We refer to Rauika Mangai's Best Practice Guidelines for Science Partnerships with Kaitiaki for Research Involving Taonga, and Te Mana Raraunga's Data Sovereignty Principles as a guide to weaving and protecting mātauranga respectfully.

We support the development of a National Policy Statement that better enables kaitiakitanga and rangatiratanga of hapū/Iwi/Māori. We believe this intergenerational approach will protect Aotearoa New Zealand's indigenous biodiversity. Please contact us if you have any further questions or wish to discuss the context of our submission; email

Ngā mihi,

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