



SUBMISSION TO
Environment Select Committee

ON THE
Proposed Fast Track Approvals Bill

April 2024
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on behalf of the
Moths and Butterflies of New Zealand Trust

This is a submission from the Moths and Butterflies of NZ Trust to the Environment Select Committee on the Fast Track Approvals Bill. We ask that the Bill be declined in its entirety.

HISTORY OF OUR ORGANISATION

1. The Moths and Butterflies of NZ Trust (MBNZT) is a charitable trust established with the vision that NZ's ecosystems support thriving moth and butterfly populations. Our mission is to engage with New Zealanders to ensure our biodiversity promotes a thriving moth and butterfly population. We are a registered charitable trust based in Auckland.
2. We are the only organisation 'speaking up' specifically for NZ's Lepidoptera, working with entomologists and organisations such as DOC, Forest & Bird, Manaaki Whenua Landcare and local government to ensure the latest information on our Lepidoptera is available for New Zealanders so that New Zealanders can help protect our native species.
3. We work in the field of environmental education with resources for schools/teachers, public speaking, displays and exhibitions. Our website and magazines are both recognised as excellent and trustworthy resources, as is our social media presence.

THE IMPORTANCE OF NZ BUTTERFLIES AND MOTHS

4. Butterflies and moths are indicators of the health of our environment as they act like "canaries in the coalmine". Where insects and invertebrates are found in healthy numbers we know that the air and water around us is free from pollution. While dragonflies, bees or spiders are overlooked, Lepidoptera are much more noticeable with their large, colourful wings - and their absence noted too.
5. When MBNZT engages with the public at exhibitions and displays we frequently hear comments as to how people remember butterflies from their childhood that are not seen today, such as NZ's red admiral, the coppers and blue butterflies.
6. In NZ over 90% of our butterflies and moths are endemic: they are found nowhere else in the world. Scientists believe that there are many more species of moths still to be discovered and named.
7. Our butterfly species also need considerable investigation. Considerable work needs to be done to accurately identify our species. The MBNZT is currently working on a

plan to identify our copper butterflies using DNA analysis. Nobody knows if they are at risk until the species we have are clearly identified. If they become extinct, they will not be able to be replaced. To save these species we first need to know them, to understand their habitat and host plants, and the ecosystem in which they survive. Once we have identified the coppers and developed an understanding of their ecosystem, we can also investigate our ringlet species.

8. Like everything in the natural world, our Lepidoptera species are also part of the food chain and a very important source of protein and minerals for our birdlife. By encouraging butterflies and moths into our gardens and habitats we are providing more variety in the diets of our wild birds.
9. Lepidoptera and other insects are frequently overlooked in gardening and planning wild spaces today. Butterflies, for example, don't just need host plants but shelter and nectar for their survival. It is a sad situation that most New Zealanders aren't even aware of the species we do have, let alone what they need to survive.
10. One of our butterfly species, only found in New Zealand is the Forest Ringlet, *Dodonidia helmsii* or Te Pēpepe pōuri. This species, the only species in its genus, was once widespread in New Zealand - including Auckland and Wellington - but has become significantly rarer over the last fifty years. It seems to have disappeared from forest below 400 m in altitude. There are still reasonable populations in the Coromandel District and on the Denniston Plateau. It is classified as "At Risk, Relict" under the NZ Threat Classification System. It is not known why its numbers are in decline.
11. The Avatar moth (*Arctesthes avatar*) is a notable species endemic to NZ. It was only discovered in 2012 on the Denniston Plateau and on nearby Mount Rochfort. This beautiful moth has Nationally Critical conservation status under the NZ Threat Classification System. Extinctions could occur before we are aware of the taxa we may have lost.
12. Another endemic moth is *Australothis volatilis*, only found in Central Otago and the Mackenzie Basin. This area supported a huge variety of historically rare ecosystems but has increasingly become developed for agriculture, horticulture, irrigation and general intensification.

EXISTING PROTECTION

13. The Conservation Act 1987 was created to promote the conservation of our natural and historic resources. Under this act the Department of Conservation was established, controlling about one-third of our land area. It also oversees an expanding visitor network but has always been hampered by the amount of funding it receives.
14. Under the current government the Department of Conservation has been demanded to make a 6.5 percent reduction in spending, meaning significant job losses. The department was already struggling to protect the conservation estate. Significant habitats and species are already at risk. Climate change is already having a major effect on the conservation estate. It is an uphill battle fighting predators and invasive species.
15. The Resource Management Act 1991 was introduced to promote the sustainable management of our natural and physical resources. As well as managing air, soil, fresh water, and coastal marine areas, it regulates land use and the provision of infrastructure. Currently NZ's natural and physical resources are managed in a sustainable framework with a range of environmental considerations.
16. The Denniston Plateau is one potential site which could be advanced under the Fast-Track Approvals Bill for coalmining. At every stage of its life, from extraction to burning, coal is detrimental to our health and environment. Coal powered the industrial age but it is now recognised as having led the planet to the brink of catastrophic climate change. As well as affecting the ecology of our flora and fauna, coal accounts for much of New Zealand's greenhouse gas emissions at a time when we should be focusing on sustainable, clean energy.
17. The Stockton Plateau and Denniston Plateau are also sites of a rare NZ species of one of the largest snails in the world, which is also one of our most threatened invertebrates. *Powelliphanta patrickensis* is limited to a habitat which will be affected by open cast coalmining. Open cast coalmining removes the soil, and vegetation supporting our birds and invertebrates. This snail's close relative, *P. augusta*, was only discovered in 2005, when most of its habitat had already been mined. It is not known whether this species of snail will survive in its new location.

18. When one translocates a species from an area which will be developed, every care is taken to find a suitable habitat. But this new habitat will only sustain the maximum size population. The residents and newcomers compete, individuals perish until once more the original population size is reached. Translocation is not always successful – and we need to understand much more about each species before we consider translocation.

THE FAST-TRACK APPROVALS BILL

19. This bill would give the three ministers sweeping powers to approve any development they wanted, no matter how damaging. These three ministers could override any existing environmental protections such as the Conservation Act or the Resource Management Act. It is our understanding that the three ministers have limited environmental expertise and interest. They could even ignore the advice of experts qualified to advise them on our indigenous biodiversity. It could also prevent New Zealanders from having their say.
20. From our interpretation of Cabinet Papers (March 2023) relating to the Crown Minerals Act 1991 and the government’s commitment to protect public conservation land, it is our understanding that over 60% of conservation land could be open to developers to fast-track projects if this bill proceeds.
21. The Bill undermines Te Tiriti and rights and interests of Māori and does not consider kaitiakitanga or the relationship of iwi and hapū with their land.

OUR RECOMMENDATION

22. This bill should be rejected as decision-making should be based on science and evidence – not politics. The ministers should be bound by the decisions of those qualified to advise – not whichever special interest groups lobby the hardest.
23. This bill should be rejected because our climate and environment are already at breaking point. NZ has the highest proportion of threatened species in the world. Many New Zealanders are already volunteering to bring back a flourishing, natural world. Decision-making should follow the direction of our conservation and environmental laws rather than giving priority to economic development.
24. Projects which damage the environment and contribute to climate change should not be able to skirt laws which protect the environment. NZ is a world leader in many

areas and should be working towards sustainability and a low emissions future, supporting ecological and human health and vitality. Our resources are finite and should be used with a view to long-term priorities and consequences. Mines on conservation land and dams which flood forests should not be able to bypass environmental laws. Before decisions are made as to whether a project should go ahead, there needs to be adequate research undertaken into the flora and fauna at the proposed site.

25. The NZ people should be able to have input into proposed developments in their communities. At present the government can already use existing fast-track processes for urgently needed infrastructure projects. Commercial and industrial projects should not be fast-tracked - they are not urgently needed.
26. The Moths and Butterflies of NZ Trust strongly opposes this Bill. We request that the stages in Parliament.
27. We would welcome an opportunity to speak to the panel and further explain our submission at the appropriate time. Please keep us informed.



Jacqui Knight, Secretary, MNZM 14 April 2024