



## New National Environmental Standard for Plantation Forestry – in negotiation

by Cath Wallace

The Ministry for the Environment (MfE) is currently developing new national level policy for plantation forestry to assist regional and district planning under the RMA. The work to date has focused on a proposed National Environmental Standard (NES) for Plantation Forestry as the tool of choice. A NES could be used to provide a consistent set of rules that apply across the country. Initially, MfE produced a discussion document which outlined a number of problems for improvement, and a possible remedy in the form of a new NES was proposed. This document has since gone out for public consultation and all of the submissions received are now available to the public on the MfE website at -

<http://www.mfe.govt.nz/laws/standards/forestry/index.html#submissions>

ECO and many other submitters found that the discussion document dwelt on the desirability of efficiency and consistency in the treatment of plantation forestry, but tended to neglect environmental considerations which ought to be central to any improvements in the status quo under the RMA. The discussion document is aimed at a range of forestry activities including



*Plantation of young pine trees*

mechanical land preparation, afforestation, earthworks, the operation of quarries for the sake of forestry operations, and harvesting. The proposed NES in the discussion document suggested that many of the controls on these activities could be done as nationally “Permitted Activities” with prescribed conditions and standards. This is in contrast to, rather than being subject to, differing rules and processes that currently occur under various regional and district plans and resource consents as is the status quo. On the positive side, regional and local councils could increase the standard’s stringency if they want to, but only in relation to a defined list of activities.

ECO made a substantive submission on this Proposed NES, and Co-chair Cath Wallace has met with and discussed issues of concern with the Ministry for the Environment and with the Forest Owners Association and the Institute of Forestry. Of major concern are the lack of alignment of the purpose of the NES with the Purpose and Principles of the Resource Management Act, and the lack of attention to biodiversity, pest control, and downstream effects especially on aquatic ecosystems and social effects. These are difficult to address using a NES tool due to its reliance on a prescriptive

### IN THIS ISSUE:

<b>New NES for Plantation Forestry</b>	<b>1</b>
<b>Aquaculture Legislation</b>	<b>2</b>
<b>Land and Water Forum Report</b>	<b>4</b>
<b>Biodiversity Strategic Plan</b>	<b>6</b>
<b>Environmental Protection Authority Bill</b>	<b>10</b>
<b>Coastal Policy Statement</b>	<b>12</b>
<b>UK to Measure National Happiness</b>	<b>12</b>
<b>Pike River Coal</b>	<b>13</b>
<b>International Year of the Forests</b>	<b>13</b>
<b>Antarctic Meeting</b>	<b>14</b>

## Omnibus Aquaculture Legislation introduced

by Barry Weeber

approach, which is in turn reliant on a high level of existing information, and on very tight definitions of rules in order to be effective. Many of the proposed definitions are considered problematic and would lead to substantial opportunity for ‘gaming’ the system, with a high likelihood of counter-productive environmental results.

ECO, like many other submitters, has raised questions as to how an activity-based NES would fit within an effects -based Act, and how the degree of specification could be achieved that would work for the variation of local conditions – even with an ability to increase the stringency of conditions for specified activities. ECO is particularly concerned that permissive conditions around “permitted activities” could result in creep of “permitted baselines” for other industries and their activities as well – though we recognise that these rules could also raise expectations on other industries in some aspects of their operation. Any ambiguity in the definition of activities covered by a new NES would produce a major risk factor in this regard, and there are many loose definitions in the discussion document. An example is that of “cultivation” which “includes drainage, felling bush, clearing land for cropping, and clearing land for planting” (p128)

On a positive note, Exec member Shane Orchard was amongst the participants attending a series of workshops convened by the Ministry for the Environment to address feedback from submitters and consider the range of approaches available to best address the issues. The workshops were held in November/early December and covered topics such as erosion and plant invasion (wilding tress)

More information on the public consultation workshops can be found at:  
<http://www.mfe.govt.nz/laws/standards/forestry/index.html>

To date this process is re-considering the full range of policy options available to MfE and also reviewing the consistency between the problem areas to be targeted and the purposes of the RMA. Interested member groups should keep a watching brief on the policy development process and it is likely that a further discussion document or revised proposal is likely to go out for another round of public consultation early in 2011.



*Salmon farm, Akaroa Harbour. Photo: Brian Sheppard*

The Government has introduced to Parliament a Bill to make major changes to aquaculture management. The Aquaculture Legislation Amendment Bill (No 3) has been referred to the Primary Production Select Committee and submissions close on Friday, 11 February 2011.

This Bill is a combined bill to make changes to the legislation governing aquaculture. The Government’s purpose is to provide an efficient legislative and regulatory framework that enables the sustainable development of aquaculture within the coastal marine area. Four separate Acts are amended—the Resource Management Act, the Fisheries Act, the Maori Commercial Aquaculture Claims Settlement Act, and the Aquaculture Reform (Repeals and Transitional Provisions) Act.

The key changes in the Bill are:

- Over-riding due process and including in the Tasman and Waikato plans two interim AMAs (clauses 100 and 101, and schedules 2 and 3);
- Removal of the requirement for aquaculture management areas (AMAs) by repealing subpart I of Part 7A of the RMA and inserting new provisions which are essentially create a first-come, first-served application process (clause 90);
- Provide a minimum 20 year term for aquaculture consents (clause 84), and consents will lapse after 3 years if not used (clause 85);
- Abbreviate the undue adverse effect test on commercial, customary and recreational fishing, which includes reducing the threshold for

## Land and Water Forum Report a brave start, which is yet to be proved

by Barry Weeber

ECO welcomed elements of the Land and Water Forum report when it was released in September.

The unequivocal call for a National Policy Statement for Freshwater and National Environmental Standards is supported, but these standards and policies must be strict. ECO is cautious as to how other recommendations will be realised.

ECO was involved in the Land and Water Forum (LAWF - previously the Sustainable Land Use Forum) since it was established in June 2009. This Forum was run in parallel with the Government's new strategy New Start for Fresh Water. ECO was a member of the LAWF Plenary meetings that received reports of process from an inner group which discussed the issues and negotiated principles, but was mostly excluded from drafting and viewing documents.

The forum to explore a new process of collaboration within water management planning was an admirable concept but it was inadequately implemented and so is still to be proved, with many interested parties not properly involved. The collaborative approach has been inspired by Scandinavian models and this was very much a pilot approach. To have integrity, a collaborative system has to work within a framework that guarantees genuine across-the-board consultation and a genuine shared vision of protecting our biodiversity, restoring our rivers and preventing on-going pollution.

The Government charged LAWF to:

- conduct a stakeholder-led collaborative governance process to recommend reform of New Zealand's fresh water management;
- through a consensus process, identify shared outcomes and goals for fresh water and related land management;
- identify options to achieve these outcomes and goals;
- produce a written report which recommends shared outcomes, goals and long-term strategies for fresh water in New Zealand.

Overall there were 58 participating members including a range of industries (eg Fonterra and Federated



*Hydro electric dams on rivers need to be acknowledged as a consumptive use of water*

Farmers), recreational and environmental groups, and local government bodies, with observers from key government departments. The operating process focused mainly on water issues and ran a two tier process with an internal group (Small Group) comprising 21 stakeholders which was to report regularly to the external plenary group ( which included ECO).

ECO supported the Forum intentions to find ways for the community to avoid some aggressive and costly RMA court processes. Too often the community defending the environment for future generations is up against those with long pockets and looking for profit to be made by over-extracting from our rivers and wetlands. ECO supported looking for less confrontational ways to discuss these serious issues and develop sound water strategies.

Environmental management requires a very strong legislative base like the RMA, because such significant profits can be made at the expense of the environment. Exploitation of the environment is why our lowland rivers and systems are being depleted and polluted by current practices.

The report has been mainly the production of the inner group with limited input from the plenary group. There was limited time or collaboration with plenary groups and little robust discussion in the plenary which was more a question and answer session than a process of engagement. This created significant problem for the ECO Executive given some of the recommendations in the report. The ECO Executive considers that the problems with the process could have been resolved if there was sufficient time, modern electronic processes in consultation were used, and there was robust engagement with plenary members.



## Nature is not expendable: International Community commits to action on Biodiversity

by Cath Wallace

There were major steps forward in biodiversity conservation at the biennial meeting of the Convention on Biodiversity (CBD COP 10) in Nagoya, Japan, in October. 193 countries and 7000 delegates agreed to a new Strategic Plan 2011-2020 and protocol to the Convention on Access and Benefit Sharing. There was also agreement on liability for living modified organisms (GMOs) as part of the Cartagena protocol to the CBD.

The Strategic Plan contains an overall vision, rationale, and targets, with commitment to 20 sub-targets, grouped within four strategic goals. The Plan includes agreements on implementation, monitoring, reporting and review, and on support mechanisms.

The agreement notes the failure of the international community to reach a 2010 Strategic Plan and seeks to “mainstream” biodiversity awareness and integration into activity and policy.

The ‘Nagoya Protocol’ on Access and Benefit Sharing was also agreed to, after over 15 years of wrangling. Developing countries will allow access to their biodiversity in return for a share of the benefits. This agreement opened up the ability to deal with goals and measures.

IUCN called it a “step change for biodiversity” and IUCN’s Director General, Julia Marton-Lefèvre said, “Here in Japan the international community have moved closer to the realisation that it’s time we stopped considering nature as expendable, and any related expenditure a write-off - it’s time we valued and conserved nature.”

IUCN said, “The stakes have been high at the Nagoya conference. The latest IUCN Red List of Threatened Species™, [released in October], showed that nature’s very backbone is at risk – with a third of species assessed seriously threatened and many among them facing the risk of extinction. The Economics of Ecosystems and Biodiversity study, known as TEEB, warns us that many of the benefits of nature that we have been taking for granted and enjoyed for free up until now are at risk of running out. The Global Biodiversity Outlook 3 showed that we are on the verge of catastrophic and irreversible tipping points.”



*Pukeko*

The UK’s Department of Environment, Food and Rural Affairs (DEFRA) noted outcomes included the following:

*“Agreement on a resource mobilisation package to help developing countries fulfil the plan, with Parties due to report to the 11th meeting in 2012 on how finance will be identified, quantified and channeled;*

*“In addition, nearly 50 individual decisions relating to a wide range of biodiversity issues (protected areas, marine, invasive species, forest biodiversity, etc) were approved in the final plenary session.*

*“Key outcomes agreed by parties included*

- To at least halve and where feasible bring close to zero the rate of loss of natural habitats including forests;*
- To establish protected areas to comprise 17 per cent of terrestrial and inland water areas and 10 per cent of marine and coastal areas;*
- Through conservation and restoration, Governments will restore at least 15 percent of degraded areas;*
- Parties will make special efforts to reduce the pressures faced by coral reefs.*
- Parties also agreed to a substantial increase in the level of financial resources in support of implementation of the Convention.”*

*certain targets may already have been achieved. Others targets may not be relevant in the country context.*

*Strategic goal A. Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society*

*Target 1: By 2020, at the latest, people are aware of the values of biodiversity and the steps they can take to conserve and use it sustainably.*

*Target 2: By 2020, at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes and are being incorporated into national accounting, as appropriate, and reporting systems.*

*Target 3: By 2020, at the latest, incentives, including subsidies, harmful to biodiversity are eliminated, phased out or reformed in order to minimize or avoid negative impacts, and positive incentives for the conservation and sustainable use of biodiversity are developed and applied, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socio economic conditions.*

*Target 4: By 2020, at the latest, Governments, business and stakeholders at all levels have taken steps to achieve or have implemented plans for sustainable production and consumption and have kept the impacts of use of natural resources well within safe ecological limits.*

*Strategic goal B. Reduce the direct pressures on biodiversity and promote sustainable use*

*Target 5: By 2020, the rate of loss of all natural habitats, including forests, is at least halved and where feasible brought close to zero, and degradation and fragmentation are significantly reduced.*

*Target 6: By 2020 all fish and invertebrate stocks and aquatic plants are managed and harvested sustainably, legally and applying ecosystem based approaches, so that overfishing is avoided, recovery plans and measures are in place for all depleted species, fisheries have no significant adverse impacts on threatened species and vulnerable ecosystems and the*

*impacts of fisheries on stocks, species and ecosystems are within safe ecological limits.*

*Target 7: By 2020 areas under agriculture, aquaculture and forestry are managed sustainably, ensuring conservation of biodiversity.*

*Target 8: By 2020, pollution, including from excess nutrients, has been brought to levels that are not detrimental to ecosystem function and biodiversity.*

*Target 9: By 2020, invasive alien species and pathways are identified and prioritized, priority species are controlled or eradicated, and measures are in place to manage pathways to prevent their introduction and establishment.*

*Target 10: By 2015, the multiple anthropogenic pressures on coral reefs, and other vulnerable ecosystems impacted by climate change or ocean acidification are minimized, so as to maintain their integrity and functioning.*

*Strategic goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity*

*Target 11: By 2020, at least 17 per cent of terrestrial and inland water, and 10 per cent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscape and seascapes.*

*Target 12: By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained.*

*Target 13: By 2020, the genetic diversity of cultivated plants and farmed and domesticated animals and of wild relatives, including other socio-economically as well as culturally valuable species, is maintained, and strategies have been developed and implemented for minimizing genetic erosion and safeguarding their genetic diversity.*

## Environmental Protection Authority Bill - mixed roles and responsibilities

by Cath Wallace

The Environmental Protection Authority (EPA) Bill has been introduced to Parliament and submissions are open until Friday 28 January 2011.

The Bill folds the Environmental Risk Management Agency into the EPA and disestablishes the interim EPA. It modifies the Resource Management Act, Hazardous Substances and New Organisms (HSNO) Act and the Climate Change Response Act. Some of the changes are substantive, some are simply technical.

There are some matters of concern on which submissions need to be made. We outline some of these but there may be more, so organisations and others should examine it closely.

The objective of the EPA is not framed in terms of improving environmental quality, but as below, refers simply to being “efficient, effective and transparent.” This leaves open what “effective” may mean and fails to pin the objective to improving environmental quality.

Objective of the EPA:

The objective of the EPA is to undertake its functions in a way that:

- (a) contributes to the efficient, effective, and transparent management of New Zealand’s environment and natural and physical resources; and
- (b) enables New Zealand to meet its international obligations.

Submissions should address this issue and propose language that actually focuses on better environmental outcomes, taking into account the purposes of the three Acts in question.

The official statement about the purpose of the Bill is as follows, and is worth reading for the sake of grasping the scope of the Bill.

To read or download the Bill, see  
<http://www.legislation.govt.nz/bill/government/2010/0246/latest/DLM3366813.html>

*The Environmental Protection Authority Bill is an omnibus Bill that amends the Climate Change Response Act 2002, the Hazardous Substances and New Organisms Act 1996, and the Resource Management Act 1991. The Bill establishes a new Environmental Protection Authority (EPA) as a Crown agent under the Crown Entities Act 2004.*

*The purpose of creating an EPA is to more effectively, efficiently and transparently manage the regulation of New Zealand’s environment and natural and physical resources. The establishment of the EPA will achieve this through creating a national-level regulatory-focused agency that can contribute to providing greater*

*central government direction on the regulation of the environment, consolidate regulatory and technical skills, and achieve efficiency gains by bringing together similar environmental regulatory functions and powers.*

*The establishment of the EPA as a Crown agent provides a clear split between environmental policy functions led by the Ministry for the Environment and the regulatory and technical functions of the EPA.*



Toxic waste will come under the new EPA Bill

*In summary, the Bill will provide for the EPA to:*

- *process matters for proposals of national significance and applications called in under the RMA;*
- *provide advice and information on the development and implementation of national environmental standards developed under the RMA;*
- *undertake all of the functions currently performed by the Environmental Risk Management Authority (ERMA) under the HSNO Act;*
- *undertake administration of the Emissions Trading Scheme under the CCRA;*

*Upon request from the responsible Minister and in relation to its functions:*

## Downgraded Coastal Policy Statement Approved

In late October the Minister of Conservation, Kate Wilkinson, finally released the New Zealand Coastal Policy Statement, this was nearly 18 months since the Board of Inquiry had reported. The approved NZCPS was significantly different from the recommendations of the Board of Inquiry. These major changes to the NZCPS and the time taken does not auger well for the process or the requirements currently under the Resource Management Act.

The changes occurred after the Minister took advice from the Ministry for the Environment and other agencies, an assessment by Napier based planning consultant Rob Van Voorthuysen and comments from Local Government New Zealand. Neither the Board of Inquiry, its members or submitters were consulted by the Minister.

The major changes made by the Minister include:

- Deleting reference to active dunes of national significance. The summary of decisions states that this “policy is subject to further consultation” but does not indicate a timetable or a process.
- Deleting the schedule on international obligations.
- Deleting the proposed section on cumulative activity.
- Adding a new section removing all restricted coastal activities (policy 29). This provision requires councils to amend their plans without consultation.
- Adding a new section promoting aquaculture including land based facilities (policy 8).
- Adding a new section recognising and protecting ports (policy 9).

On the positive side the Minister:

- retained the provisions to protect surfbreaks of national significance (policy 16) and lists them in schedule 1
- strengthens protection of indigenous biodiversity (especially policy 11).
- improved control of vehicles on beaches (policy 20).
- Required consideration of coastal hazards for 100 years or more. This would include sea level rise and storm events (objective 5 and policy 25).

The new NZCPS took effect on 3 December 2010.

## UK to Measure National Happiness

by Cath Wallace

The Prime Minister of the United Kingdom, David Cameron, has announced his government’s policy to develop an index of National Happiness, and they are commissioning the UK’s Government Statistician to construct such an index (Guardian, [guardian.co.uk](http://guardian.co.uk), Sunday 14 November 2010 20.06 GMT).

A National Happiness index picks up on personal and social satisfaction and wellbeing, optimism, resilience, autonomy, self esteem, and other factors at work, at home and in society. Social connectedness, environmental quality and political voice are all contributors to National Happiness. The intent is to recognise that wellbeing is a reflection of far more than simply national income as measured by GDP.

Bhutan was the first country to adopt such an index and until now, these indexes have been mainly developed by academics, non-governmental organisations, and independent institutes. Only recently have major governments begun to adopt them. France commissioned the Stiglitz, Sen and Fitoussi Report (2009), and Canada is considering such an index too.

In the UK some sceptics suggest this is simply a device to deflect attention from the languishing economy, or to pick up on the warm fuzzies expected there from the 2011 Royal wedding. In fact it is a much more strongly and legitimately developed concept and index than that would suggest. The Happiness Index and other mixed indexes that take account of human relationships, aspirations and needs beyond income have been under development, discussion and construction for many years. The UK’s decision is to be applauded.

ECO urges the Government to develop a similar index for New Zealand so that we can better measure changes to overall wellbeing and environmental quality.

For background of the index in Europe, see: <http://tinyurl.com/2wxghfy>

See also:

Commission on the Measurement of Economic Performance and Social Progress:  
<http://www.stiglitz-sen-fitoussi.fr/en/index.htm>

New Press, 2010 - Business & Economics - 136 pages: <http://tinyurl.com/2ck2prj>



## Little progress at Antarctic Marine Meeting

The recent Antarctic fisheries meeting failed to make substantive progress on key conservation issues at this year's meeting. The 25 Government member Commission on the Conservation of Antarctic Marine Living Resources (CCAMLR) failed to achieve the necessary consensus to implement several important proposals. The meeting ended in early December in Hobart.

The Antarctic and Southern Ocean Coalition (ASOC) expressed its extreme disappointment at the meetings failure. ASOC is a global coalition of conservation NGOs, including ECO.

Many important issues were on the agenda for this year's meeting, including:

- managing the rapidly expanding Antarctic krill fishery;
- implementing strong measures to combat illegal (IUU) fishing;
- making progress on the designation of a representative system of marine protected areas (MPAs) in the Southern Ocean; and
- addressing the recommendations of an independent performance review.

CCAMLR made little progress on achieving its agreed goal to designate a large network of MPAs in the Southern Ocean by 2012. A proposal that would have set down the guiding principles for establishing MPAs was not agreed at the meeting.

"In the face of the increasing threats facing the Southern Ocean, including those posed by climate change and ocean acidification, establishing a representative system of MPAs and marine reserves is absolutely crucial. CCAMLR lacks a real sense of urgency," said Richard Page, Greenpeace Oceans Campaigner.

ASOC hopes that CCAMLR's agreement to have a special meeting on MPAs in France next year will ensure that necessary progress occurs.

ASOC welcomed actions taken this year to improve the management of the krill fishery including requiring krill fishing vessels to use a centralized vessel monitoring system to increase focus on research and to raise the percentage of scientific observers on board.

Krill catches have increased by seventy percent over the last year to over 210,000 tonnes, and reports indicate that interest is growing in the krill fishery and that several nations have planned to increase their capacity to fish for Antarctic krill.

An important source of uncertainty in the management of the krill fishery is the dated information on krill biomass. ASOC welcomed the decision by Norway to commit vessel time for the next five years to conduct research.

There was no progress in addressing the concentration of krill fishing in coastal areas where predators (whales, seals and penguins) typically forage. Further protective measures are needed to ensure krill remains available for land based predators such as penguins and seals.

"While we appreciate the improvements agreed at this year's CCAMLR meeting," said Gerald Leape, Director, Antarctic Krill Conservation Project, "we are disappointed that other significant actions on illegal, unreported and unregulated (IUU) fishing, including port state measures and market measures were not agreed."

"IUU fishing undermines CCAMLR's precautionary, ecosystem-based approach to management and often employs more destructive fishing methods that harm vulnerable species and ecosystems."

Many CCAMLR Members have acceded to the UN Food and Agriculture Organization's (FAO) Port State Measures Agreement, but they did not agree to measures that would have brought CCAMLR's IUU regulations into line with those of the FAO Agreement.

This failure to act came at a time when new data presented at the meeting indicated that the level of IUU fishing in the CCAMLR area is higher than previously thought.

An independent body conducted a performance review of CCAMLR in 2008 and identified numerous areas in which CCAMLR needed to take action to improve its management of the Southern Ocean. CCAMLR has discussed many of these recommendations but has taken action on only a handful.



## ECO MEMBER ORGANISATIONS

Action for the Environment  
Appropriate Technology for Living Association  
Auckland Civic Trust  
Bay of Islands Coastal Watchdog  
Bay of Islands Maritime Park Inc.  
Baywatch Hawkes Bay Environment Group  
Buller Conservation Group  
Clean Stream Waiheke  
Clean Water Clean Water Whangamata  
Coromandel Watchdog of Hauraki  
Cycling Advocates Network  
East Coast Bays Coastal Protection Society  
East Harbour Environmental Association  
Eastern Bay of Islands Preservation Society  
Engineers for Social Responsibility  
Environmental Futures  
Far North Environment Centre  
Federated Mountain Clubs of NZ  
Foundation for Environmental Education New Zealand  
Friends of Golden Bay  
Friends of Lewis Pass and Hurunui Catchment  
Friends of Nelson Haven and Tasman Bay  
Friends of the Earth - NZ  
Friends of the Shoreline  
Gecko, Victoria University Environment Group  
GE-Free New Zealand in Food and Environment  
Greenpeace NZ  
Guardians of Pauatahanui Inlet  
Island Bay Marine Education Centre  
Kaipatiki Project  
Kakariki - Canterbury University Environment Group  
Lincoln Environment Group  
Marlborough Environment Centre  
Massey Environmental Group  
Monarch Butterfly New Zealand Trust  
National Council of Women of NZ  
Nelson Environment Centre  
New Zealand Institute of Landscape Architects  
Nga Uruora - Kapiti Project Charitable Trust  
North Canterbury Branch Forest & Bird  
Orari River Protection Group  
Organics Aotearoa New Zealand  
Pacific Institute of Resource Management  
Save Mahinerangi Society  
Save the Otago Peninsula  
Soil and Health Association of NZ  
South Coast Environment Society  
Students for Environmental Action  
Surfbreak Protection Society  
Sustainable Otautahi Christchurch  
Sustainable Whanganui Trust  
Sustaining Hawke's Bay Environment Centre  
Te Aroha Earthwatch  
Thames Coast Preservation and Protection Society  
The Sandy Walker Group  
Wellington Botanical Society  
Wellington Tramping and Mountaineering Club  
Wildlife Society, NZVA  
Yellow Eyed Penguin Trust

# JOIN US!!!



Sent by ECO  
PO Box 11-057  
Wellington  
Aotearoa/New Zealand

New Zealand  
Permit No. 221318

