

Submission on the Draft National Adaptation Plan (NAP) and options for managed retreat.

1. Overarching themes	
Theme/Topic	Explanation
Need for information and guidance	<p>To date there has been little information on the likely impacts of climate change on the Chatham Islands. Recent studies that have been carried out for New Zealand have not covered the Islands – for example, the NZ SeaRise Programme covered all of New Zealand including Stewart Island but did not cover the Chatham Islands. The Chatham Islands are particularly vulnerable to the potential impacts of climate change, as outlined below, and it is vital that we have good information so as to prepare for those impacts.</p> <p>The Chatham Islands Council seeks further guidance on its role in responding to climate change impacts. There is a need for clear guidance on how improved resilience measures can be developed and when and how managed retreat is likely to occur. Significant funding will be needed to enable the Council to carry out planning processes under the Natural and Built Environments Act and the Spatial Planning Act. The Government needs to ensure that this funding is sufficient to cover provision for increased climate resilience and managed retreat.</p>
Need for Central Government Funding	<p>The Chatham Islands Council is not in a financial position to fund either increased resilience measures or managed retreat. The population of the Islands is only around 667 people and as such there is very little revenue received from rates. The Council relies heavily on Central Government funding to carry out its functions and will need further funding to respond to the effects of climate change. The acquisition of land for relocation of homes and businesses, is beyond the financial capability of the Council.</p> <p>The Chatham Islands are home to species of plants and animals that are not found anywhere else in the world. The history of the Islands is unique and valuable at a national level, and the Islands are rich in historical and cultural heritage sites. These sites, many of which are close to the coast and vulnerable to the effects of sea level rise, require Government funded protection. Unique and threatened species will also need to be protected through nationally funded programmes and could be managed by the Department of Conservation.</p>
Particular vulnerability of the Chatham Islands community	<p>The Chatham Islands community is particularly vulnerable to the likely impacts of climate change. The Islands need good information, planning, funding, and actions to improve the resilience of their communities.</p>

- Chatham Island itself, which is home to the majority of the Islands' population, is flat and low-lying with most people living in small towns on the coast. There is very little opportunity for relocation to higher land and as such there will need to be careful planning to manage the effects of sea level rise on the communities. It is difficult to plan for this without better information on the likely levels of sea level rise for the Islands.
- Much of the Island's infrastructure is also low-lying. The airport, roads, schools, hotel, and health centre are all at or near sea-level. In the event of significant sea level rise, or increased frequency and intensity of storms, much of the Island's infrastructure is likely to be significantly impacted. This infrastructure is also essential for the tourism industry on the Islands.
- The Chatham Islands economy is reliant on agriculture, fisheries, and tourism, which are likely to be significantly impacted by climate change. It is likely that droughts will increase in both frequency and intensity, and this could significantly impact on agriculture. It is difficult to determine the effects of rising sea temperatures and acidity on the fishing industry and research is needed to address this lack of information.
- The Islands' population has a very high proportion of Moriori and Māori, and people living in rural areas, both of which groups are identified in the consultation document as being particularly vulnerable to the impacts of climate change.
- The drinking water supply on the Islands is particularly vulnerable for a number of reasons:
 - Most of the freshwater on Chatham Island is very heavily peat-stained and unsuitable for human consumption
 - Many households rely on rainwater tanks, but these can run dry during periods of low rainfall. Droughts are expected to increase in both frequency and intensity and this will put those households at further risk of running out of potable water.
 - Waitangi township and some other households have groundwater bores. It has been noticed that these bores are becoming less reliable in supplying water and people are considering drilling deeper wells. There is very little known about the groundwater resource on the Islands and research needs to be done into its size, how it is recharged, and the potential for inundation by salt water as the sea level rises.
 - Kaingaroa township gets its water from Lake Rangitai, which is a freshwater dune lake. During the drought in 2021 this lake was close to running dry. There is little information on how the dune lakes are recharged, and as the

	frequency and intensity of droughts increase with climate change, this township is also at risk of running out of potable water.
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2. Key consultation questions

Theme/Topic	
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General questions

<p>1. Climate change is already impacting New Zealanders. Some examples include extreme weather events such as storms, heatwaves and heavy rainfall which affects lives, livelihoods, health and wellbeing, ecosystems and species, economic, social and cultural assets, services (including ecosystem services) and infrastructure. How is climate change impacting you? This could be within your community and/or hapū and iwi, and/or your business/organisation, and/or your region.</p>	<p>The Chatham Islands have noticed an increase in the variability of rainfall over the last few years. In 2021 there was an extended period of drought where drinking water supplies ran extremely low. Freshwater lakes used as a potable supply were nearly empty while households relying on rainwater tanks ran out of water. This lack of water could affect the tourism industry as well as the local population. Drought events are likely to happen more frequently as the global temperature increase because of climate change.</p>
<p>2. The national adaptation plan focuses on three key areas. Please indicate and explain which area is most important for you.</p> <ul style="list-style-type: none"> • focus area one: reform institutions to be fit for a changing climate. This means updating the legislative settings so that those who are responsible for preparing for and reducing exposure to changing climate risk will be better equipped. • focus area two: provide data, information and guidance to enable everyone to assess and reduce their own climate risks. This means that all New Zealanders will have access to information about the climate risks that are relevant to them • focus area three: embed climate resilience across government strategies and policies. This means that Government agencies 	<p>The second focus area is most important to the Chatham Islands Council because much of the available New Zealand data does not cover the Chatham Islands. As the Islands are particularly vulnerable to the effects of sea level rise and changing rainfall patterns as outlined in answers to questions below, it is vital that we are included in any studies that are carried out.</p> <p>The Chatham Islands Council would welcome information and guidance to enable our community to assess and reduce our climate risks. Without information and guidance our situation is worrying and difficult to plan for.</p>

<p>will be considering climate risks in their strategies and proposals.</p> <ul style="list-style-type: none"> • other? Please explain. 	
<p>3. We all have a role to play in building resilience to climate change, but some New Zealanders may be more affected and less able to respond. There is a risk that climate change could exacerbate existing inequities for different groups in society. <u>Appendix 3</u> sets out the full list of actions in this national adaptation plan.</p> <p>a) What are the key actions that are essential to help you adapt? Please list them.</p> <p>b) Which actions do you consider to be most urgent? Please list them.</p> <p>c) Are there any actions that would help ensure that existing inequities are not exacerbated? Please list them.</p> <p>d) Are there any actions not included in this draft national adaptation plan that would enable you to assess your risk and help you adapt?</p>	<p>a) key actions:</p> <p>Provide access to the latest climate projections data.</p> <p>Build property resilience</p> <p>Expand current funding for proactive community resilience.</p> <p>Public investment in climate change initiatives.</p> <p>Raise awareness of climate-related hazards and how to prepare.</p> <p>Produce guidance for preparing adaptation plans.</p> <p>Regularly update adaptation guidance for local government</p> <p>Connect communities to wider response and recovery support.</p> <p>Pass legislation to support managed retreat</p> <p>Establish central government oversight and coordination for implementing the national adaptation plan</p> <p>Implement the Water Availability and Security programme.</p> <p>Reform institutional arrangements for water services</p> <p>Establish a foundation to work with Māori on climate actions</p> <p>Partner with Māori land owners to increase the resilience of Māori-owned land, homes and cultural sites.</p> <p>Support kaitiaki communities to adapt and conserve taonga/cultural assets,</p> <p>Develop a framework for assessing exposure and vulnerability of cultural assets/taonga to climate change.</p> <p>Design and develop an Adaptation Information Portal</p> <p>Develop the emergency management workforce</p> <p>Invest in strengthening border biosecurity.</p> <p>Scope a resilience standard or code for infrastructure</p>

	<p>Encourage and support the evaluation of climate-related risks to landfills and contaminated sites.</p> <p>Assess healthcare service resilience.</p> <p>Develop the Health National Adaptation Plan.</p> <p>Deliver the national Freight and Supply Chain strategy</p> <p>Develop options for home flood insurance issues.</p> <p>Implement the Government response to the Prime Minister’s Chief Science Advisor’s report on commercial fishing.</p> <p>Support the Aotearoa Circle Climate Change Adaptation Strategy for the Seafood Sector.</p> <p>Develop the Tourism industry Transformation Plan</p> <p>Meeting the costs of a climate-resilient tourism sector.</p> <p>Continue prioritising research and investment in climate-related science.</p> <p>c) to not exacerbate existing inequities:</p> <p>The Chatham Islands community are particularly vulnerable to the impacts of climate change. Including the Islands in New Zealand studies of the predicted impacts of climate change is essential to ensure that inequalities in the availability of information are not exacerbated.</p> <p>The Chatham Island population nearly all live in low-lying settlements on the coast, that are particularly vulnerable to the effects of sea level rise. There is really no higher land to migrate to on Chatham Island itself. Special provisions will need to be considered for ensuring that homes are resilient to sea level rise rather than relying on managed retreat.</p> <p>58.4% of the population identified as Moriori/Māori in the 2013 census compared to 14.9% nationally. Māori are identified in the draft adaptation plan as being more vulnerable to the impacts of climate change than other ethnic groups. Areas like the Chatham Islands with high Māori populations will need more support to manage these effects than is the case for other parts of New Zealand.</p> <p>The Chatham Islands are unique in being home to Moriori. Their history and cultural sites are not replicated anywhere else and will require special protection from the effects of climate change.</p>
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	<p>The Chatham islands Council has an extremely low rating base with a population of only about 600 people. The Council is not in a position to provide funding for either improving resilience or the costs of adaptation. Central Government needs to ensure that people living in areas where the Council has very low funding are not disadvantaged.</p>
<p>4. Central government cannot bear all the risks and costs of adaptation. What role do you think asset owners, banks and insurers, the private sector, local government and central government should play in:</p> <p>a) improving resilience to the future impacts of climate change?</p> <p>b) sharing the costs of adaptation?</p>	<p>The Chatham islands Council has an extremely low rating base with a population of only about 667 people. The Council is not in a position to provide funding for either improving resilience or the costs of adaptation. Central Government needs to ensure that people living in areas where the Council has very low funding are not disadvantaged.</p> <p>Incomes are generally low on the Islands and property values are low. Most of the community are also not in a position to supply funding.</p> <p>In reality Central Government will need to provide more funding to the Chatham Islands community than is the case for other New Zealand communities. This is because of low incomes, very little council funding, and the effects of geographic isolation. Everything costs more on the Islands than it does on mainland New Zealand. Freight to the Islands is expensive, as is bringing specialists to carry out work. There may be some input from insurers, but that is unknown at this time. It may be that they consider the Islands a high-risk environment with insurance becoming expensive and difficult to obtain.</p>
<p>5. The National Climate Change Risk Assessment recognised that there may be economic opportunities in adapting to a changing climate.</p> <p>a) What opportunities do you think could exist for your community or sector?</p> <p>b) What role could central government play in harnessing those opportunities?</p>	<p>a) The National Climate Change Risk Assessment identifies the following potential economic opportunities that are relevant for the Chatham Islands:</p> <ul style="list-style-type: none"> • Tourism could increase in drier and warmer conditions. <ul style="list-style-type: none"> ○ The Chatham Islands are expected to experience increased temperatures and increased rainfall as a result of climate change. This could be advantageous to tourism on the Islands. However, the predicted increase in frequency, duration and intensity of drought periods is likely to impact on drinking water supplies, as is the impact of sea level rise on groundwater resources. It will be difficult to increase tourist numbers without a more reliable water supply. Sea level rise could also impact the airport, roads, and hotel which are all very very low-lying.

	<ul style="list-style-type: none"> • Increased primary sector production due to warmer temperatures, including increased pasture growth and fisheries. <ul style="list-style-type: none"> ○ As we have very little information on the potential impacts of climate change on the Islands it is difficult to determine whether these economic opportunities will actually occur. The impacts on the highly valuable fishing industry need to be determined. This industry is the main source of employment for the local community. Pasture growth could be significantly impacted by the increased frequency and intensity of droughts due to climate change. <p>b) Central Government could help with harnessing these opportunities by funding research into the likely impacts of climate change on the Chatham Islands, and into groundwater reserves on the Islands as these are poorly understood.</p>

System-wide actions	
<p>6. Do you agree with the objectives in this chapter? Please explain your answer.</p>	<p>The Chatham Islands Council agree with the four objectives in this chapter. We particularly support the provision of robust information about climate risks and adaptation solutions being made available to all. Such information for the Chatham islands has been scarce to date and it is essential that this is developed and made available so that we can plan for our future.</p> <p>The Council is also very supportive of the development of clear roles and responsibilities. As outlined in previous answers, there will need to be considerable Central Government involvement in both funding and implementing climate resilience and managed retreat strategies for the Islands. For the same reason, we support the development of tools, guidance and methodologies to enhance our ability to adapt.</p> <p>Investment in climate resilience is a major concern for us and we support unlocking Central Government funding.</p>

	<p>The NCCRA identifies risk to potable water as the most urgent risk from climate change. The Chatham Islands are already experiencing unreliable drinking water supply in times of drought and this is likely to worsen as climate change increasingly impacts on rainfall.</p> <p>The success or failure of the managed retreat framework will depend on how successfully the system integrates mechanisms across all the legislation currently under development. It is concerning that the timeline for development of the Climate Adaptation Act proposes introducing the Bill after the NBA and SPA have been passed into legislation. There will be limited opportunity to assess and test how well different components of the system mesh and integrate.</p>
<p>7. What else should guide the whole-of-government approach to help New Zealand adapt and build resilience to a changing climate?</p>	<p>The whole-of-government approach should be guided by ensuring equitable outcomes for all communities in New Zealand. This will not be achieved by a one size fits all approach. Particular circumstances need to be taken into account to ensure that inequities are not exacerbated. The Chatham Islands are particularly vulnerable to the effects of climate change and also have greater challenges to adaptation and resilience than other parts of New Zealand.</p>
<p>8. Do you agree that the new tools, guidance and methodologies set out in this chapter will be useful for you, your community and/or iwi and hapū, business or organisation to assess climate risks and plan for adaptation?</p>	<p>It is essential that the tools, guidance and methodologies to be developed include information for the Chatham Islands. To date New Zealand wide information has not included the Islands and this needs to be rectified. The Islands also have a range of particular circumstances that require a bespoke response.</p>
<p>9. Are there other actions central government should consider to:</p> <ul style="list-style-type: none"> a) enable you to access and understand the information you need to adapt to climate change? b) provide further tools, guidance and methodologies to assist you to adapt to climate change? c) remove barriers to greater investment in climate resilience? 	<ul style="list-style-type: none"> a) Relevant information needs to be gathered and made available to the Chatham Islands Council and community so that we can plan for the effects of climate change. This needs to include likely sea level rise, changes to weather patterns, effects on fisheries, and options for potable water supply. b) The Chatham islands Council will need considerable Central Government assistance with adaptation to climate change.

<p>d) support local planning and risk reduction measures while the resource management and emergency management system reforms progress?</p>	<p>c) Central Government funding will be required to ensure climate resilience is developed.</p> <p>d) The most important action that central government should consider to help the Chatham Islands community is the provision of good local information regarding the potential impacts of climate change on the islands.</p>
<p>10. What actions do you think will have the most widespread and long-term benefit for New Zealand?</p>	<p>Having really good data about potential impacts along with clear guidelines for local government and communities on how to manage those impacts. High quality early engagement with local communities and tāngata whenua will be vital to ensure that apprehension is minimised and all voices are heard.</p>
<p>11. Are there additional actions that would strengthen climate resilience?</p>	<p>The focus should really be on minimising climate change through reduced emissions.</p>
<p>12. There are several Government reform programmes underway that can address some barriers to adaptation, including the Resource Management (RM) reform. Are there any additional actions that we could include in the national adaptation plan that would help to address barriers in the short-term before we transition to a new resource management system?</p>	<p>Continuing to fund studies into potential impacts, and identifying areas that could be used to house displaced communities.</p>
<p>13. In addition to clarifying roles and providing data, information, tools and guidance, how can central government unlock greater investment in resilience?</p> <p>a) Would a taxonomy of ‘green activities’ for New Zealand help to unlock investment for climate resilience?</p>	<p>A taxonomy of green activities could help to unlock greater investment in resilience.</p>

<p>The natural environment</p>	
<p>14. Do you agree with the actions set out in this chapter?</p>	<p>The Chatham Islands Council agrees with the actions set out in this chapter.</p>
<p>15. What else should guide central government’s actions to address risks to the natural environment from a changing climate?</p>	<p>The Chatham Islands is home to plants and animals that exist nowhere else. There is little scope on small islands far from the mainland for species to move as the climate changes. Te</p>

	Whanga lagoon that encompasses a significant proportion of Chatham Island is home to some of these species and is at risk as sea levels rise. Scientific evaluation of the possible effects of climate change on the Islands' ecosystems is urgently needed.
16. Are there other actions central government should consider to: a) support you, your community, iwi and hapū, business and/or organisation to build the natural environment's climate resilience? b) strengthen biosecurity in the face of climate change? c) identify and support New Zealand's most vulnerable ecosystems and species in a changing climate?	a) Implementation of the DOC CCAAP will help the Islands' council, community, imi and iwi to make plans for building the resilience of the unique natural environment of the Islands. b) The Chatham Islands Council have invested heavily in biosecurity for the Islands. These activities rely on Central Government funding and the funding need is likely to increase as the climate changes. c) The identification of vulnerable ecosystems is essential for the Chatham Islands. There may need to be different solutions developed for these species as mainland solutions may not work in this unique environment.
17. What do you identify as the most important actions that will come from outside of central government (eg, local government, the private sector or other asset owners, iwi, hāpu and/or other Māori groupings such as: business, forestry, fisheries, tourism, urban Māori, the private sector) to build the natural environment's resilience to the impacts of climate change?	<ul style="list-style-type: none"> • imi and iwi – The Hokotehi Moriori Trust have developed an Iwi Management Plan for the Chatham Islands natural environment. The Ngāti Mutunga o Wharekauri Trust could also develop their own plan. • fisheries – need to monitor catches and look at trends for different species • tourism – need to assess the vulnerability for both the airport and the port. Also there is a need to understand options for potable water supply as the frequency and intensity of drought increases.
18. Are there additional actions that would advance the role of Māori as kaitiaki in a changing climate?	The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.

Homes, buildings and places	
19. Do you agree with the outcome and objectives in this chapter?	The Chatham Islands Council agree with the outcome and objectives in this chapter.
20. What else should guide central government's actions to increase the resilience of our homes, buildings and places?	Affordability of actions to increase the resilience of our homes, buildings and places. The Chatham Islands Council and community have very limited budgets and will need Central

	Government assistance to upgrade buildings, identify and protect important cultural sites, and support adaptation and relocation.
21. Do you agree with the actions set out in this chapter?	The Chatham islands Council agree with the actions set out in this chapter.
22. Are there other actions central government should consider to: a) better promote the use of mātauranga Māori and Māori urban design principles to support adaptation of homes, buildings and places? b) ensure these actions support adaptation measures targeted to different places and respond to local social, cultural, economic and environmental characteristics? c) understand and minimise the impacts to cultural heritage arising from climate change?	a) The Council do not want to comment on issues that need to be directly talked through with tāngata whenua. b) The Chatham Islands require a targeted response from Central Government to support adaptation measures for the Islands’ homes, buildings and places. the particular social, cultural, economic, and environmental characteristics that justify such a targeted response have been outlined earlier in this submission. c) The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.
The following questions are about existing buildings. These can include housing, communal residential (hotels, retirement village), communal non-residential (church, public swimming pools), commercial (library, offices, restaurant), industrial (factory, warehouse).	
23. Do you think that there is a role for government in supporting actions to make existing homes and/or buildings more resilient to future climate hazards? If yes, what type of support would be effective?	The Chatham Islands Council consider that Central Government should support making existing homes and/or buildings more resilient to future climate hazards. This support should include: <ul style="list-style-type: none"> • Provision of good quality information, specific to the Chatham Islands, on the likely impacts of climate change on homes and/or buildings • Provision of guidance as to how such potential impacts can be managed • Funding and managing actions to improve resilience of homes and/or buildings This support should keep in mind the limited options for managed retreat on the Islands.

<p>24. From the proposed actions for buildings, what groups are likely to be most impacted and what actions or policies could help reduce these impacts?</p>	<p>Groups most likely to be impacted include people living in coastal and low-lying communities including Waitangi, Te One, Kaingaroa, Owenga, and Port Hutt, coastal industry such as fish processing factories, tourist businesses such as the Chatham Islands Hotel, and tāngata whenua. Central Government actions that could help reduce these impacts have been outlined in our response to question 23.</p>
<p>25. What are some of the current barriers you have observed or experienced to increasing buildings' resilience to climate change impacts?</p>	<p>Barriers to increasing the resilience of buildings include:</p> <ul style="list-style-type: none"> • lack of data on the likely impacts of climate change for the Chatham Islands • lack of guidance on options to increase resilience • lack of funding

<p>Infrastructure</p>	
<p>26. Do you agree with the outcome and objectives in this chapter?</p>	<p>The Chatham Islands Council agree with the outcome and objectives of this chapter.</p>
<p>27. What else should guide central government's actions to prepare infrastructure for a changing climate?</p>	<p>Consideration should be made for the extreme isolation of the Chatham Islands. The airport is on low-lying land and vulnerable to sea level rise. The likely increased frequency and severity of storms could also impact the ability of planes to land or take off. Measures to increase the resilience of the airport should be a top consideration.</p> <p>Alternative methods of electricity generation should also be a top priority. Currently electricity is generated entirely from diesel leaving the Islands vulnerable to increases in price and outages if diesel supplies run low.</p> <p>As outlined earlier in this submission, there is a need to identify reliable sources of potable water, especially as droughts increase in frequency and intensity.</p> <p>Roading is at risk if the sea level rises and Kaingaroa is vulnerable to becoming cut off is Te Whanga is no longer able to be so easily drained to the sea.</p>
<p>28. Do you agree with the actions set out in this chapter?</p>	<p>The Chatham Islands Council agree with the actions set out in this chapter, but would like to see more Central Government involvement in the actual identification and management of</p>

	risks to infrastructure on the Islands rather than just the development of identification methodologies and codes.
<p>29. The national adaptation plan has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa.</p> <p>a) Do you see potential for further aligning actions across local government, central government and private sector asset owners?</p> <p>b) Do you see any further opportunities to include local mana whenua perspectives and mātauranga Māori in infrastructure adaptation decision-making?</p> <p>c) Do you see any further opportunities to include local community perspectives in infrastructure adaptation decision-making?</p> <p>d) Do you see any further opportunities to ensure that groups who may be disproportionately impacted by climate change, or who are less able to adapt (such as those on low incomes, beneficiaries, disabled people, women, older people, youth, migrant communities) have continued and improved access to infrastructure services as we adapt?</p> <p>e) Do you think we have prioritized the right tools and guidance to help infrastructure asset owners understand and manage climate risk?</p>	<p>a) Yes, the Council see that central government will need to work closely with the Council, telecommunications companies, and the Enterprise Trust to ensure that infrastructure is protected.</p> <p>b) The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.</p> <p>c) As the population of the Islands is very small, the whole community should be involved in all stages of the decision-making process.</p> <p>d) These groups will need assistance, including financial assistance, from government to have continued and improved access to infrastructure services.</p>
<p>30. Are there additional infrastructure actions that would help to strengthen Māori climate resilience?</p>	The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.
<p>31. Are there any other tools or data that would help infrastructure asset owners make better decisions?</p>	As with all other aspects of this consultation document, the Chatham Islands Council will need access to good quality data and guidance on the likely impacts of climate change on the Islands.

Communities

32. Do you agree with the outcome and objectives in this chapter?	The Chatham Islands Council agree with the outcome and objectives in this chapter.
33. Do you agree with the actions set out in this chapter?	The Chatham Islands Council acknowledge that their community is largely made up of groups identified as vulnerable to the impacts of climate change – Māori and rural communities.
34. What actions will provide the greatest opportunities for you and your community to build climate resilience?	The Chatham Islands community will need considerable assistance from Central Government to build climate resilience. The health care providers on the Islands will be essential for supporting the community both physically and mentally and will need support to do so.
<p>35. Are there additional actions central government should consider to:</p> <ul style="list-style-type: none"> a) support your health and wellbeing in the face of climate change? b) promote an inclusive response to climate change? c) target support to the most vulnerable and those disproportionately impacted? 	<ul style="list-style-type: none"> a) funding health care provision, supplying information, guidance and funding for adaptation programmes, ensuring that the water supply is resilient to the effects of climate change, and ensuring that communities do not become entirely isolated as a result of changing weather and impacts of sea level rise on roading and the airport. b) Central Government will need to ensure that there is good collaboration with the Council, imi, iwi, and the local community at all stages of the adaptation process. c) The Chatham Islands community is likely to be more severely impacted by climate change than communities on mainland New Zealand. This is a result of the geography and isolation of the Islands, a lack of information, vulnerable communities, and a lack of Council funding. This needs to be taken into account in all actions the Government takes in response to climate change.
36. What do you think are the most important actions that will come from outside of central government (eg, local government, the private sector or other asset owners, iwi, hāpu, non-government organisations, community groups) to strengthen community resilience in the face of climate change?	
37. Are there additional actions could be included in the national adaptation plan to help strengthen climate resilience for iwi, hāpu and whānau?	The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.

The economy and financial system	
38. Do you agree with the outcome and objectives in this chapter?	The Chatham Islands Council agree with the outcome and objectives in this chapter.
39. What else should central government do to realise a productive, sustainable and inclusive economy that adapts and builds resilience to a changing climate?	While the Draft Adaptation Plan concentrates on Government providing tools and information, reducing barriers to adaptation, and delivering strategies, there will need to be a more hands-on approach for the Chatham Islands. This will need to include funding and actual assistance with the adaptation process.
40. Do you agree with the actions set out in this chapter?	
41. Are there other actions central government should consider to: a) support sectors, businesses and regional economies to identify climate risks and adapt? b) promote a resilient financial system in the face of climate change?	a) The Chatham Islands economy will be disproportionately impacted by climate change. It is highly dependent on the vulnerable primary production, tourism, and fishing industries. Chatham Island is also low-lying making it vulnerable to sea level rise. A high percentage of the community identify as Māori, a vulnerable group. As such, Government will need to provide greater levels of funding to identify risks and adapt on the Islands than in the rest of New Zealand.
42. What do you think are the most important actions that will come from outside of central government (eg, local government, the private sector or other asset owners, iwi, hāpu and/or other Māori groupings such as: business, forestry, fisheries, tourism, urban Māori, the private sector) to reduce the economic and financial risk they face from climate change?	
43. Are there additional actions within the financial system that would help strengthen Māori climate resilience?	The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.
44. In the context of other risk management options (eg, flood barriers, retreat from highrisk areas), what role should insurance have as a response to flood risk? Please explain your answer.	
45. Should the Government have a role in supporting flood insurance as climate change risks cause private insurance retreat?	

<p>a) Does your answer to the above question depend on the circumstances? (For example, who the owner is (eg, low income), the nature and characteristics of the asset (eg, residential or commercial property, contents and vehicles), what other risk management options are available and their cost/benefit, and where the asset is located?) Please explain your answer.</p>	
<p>46. If you think the Government should have a role in supporting flood insurance as climate change risks cause private insurance retreat, how do you envision the Government's role, and how is this best achieved (eg, direct support and/or indirect support such as reducing underlying flood risk)?</p>	
<p>47. If the Government were to directly support flood insurance:</p> <ul style="list-style-type: none"> a) what is the best way to provide this direct support? b) should the Government's focus be to support availability or affordability of insurance, or both? c) how should the costs of that support be funded, and by whom? d) what are the benefits and downsides of this approach? e) should this support be temporary or permanent? f) if temporary, what additional measures, if any, do you think would be needed to eventually withdraw this support (eg, undertaking wider flood protection work)? g) what would the risks or benefits be of also including non-residential property, such as commercial property? h) what design features or complementary policies are needed so any flood insurance intervention retains incentives for sound flood-risk management (eg, discouraging development in high-risk locations)? 	

48. How effective do you think the insurance “price signal” (eg, higher premiums or loss of insurance) is for providing incentives to reduce flood risk?	
49. In your view, should a scheme similar to Flood Re in New Zealand be used to address current and future access and affordability issues for flood insurance? Why or why not?	
50. How do you think a scheme similar to Flood Re in New Zealand could support or hinder climate change adaptation initiatives in New Zealand?	

Closing general questions	
51. Do you have any other thoughts about the draft national adaptation plan that you would like to share?	

Managed retreat	
52. Do you agree with the proposed principles and objectives for managed retreat? Please explain why or why not.	<p>The Chatham Islands Council agree with the principles and objectives for managed retreat set out in the consultation document. We would like further clarification on what constitutes intolerable risk. we note that our Council are not in a financial position to acquire land and will need to rely on central government funding for this. The Chatham Islands community will need good information on the risks posed by climate change to enable effective planning for managed retreat.</p> <p>The Council have some concerns regarding the principles and objectives for funding and financing adaptation set out in the consultation document. As outlined earlier in this submission, the Council are not in a financial position to contribute to managed retreat. The</p>

	<p>principle to limit the Crown’s fiscal exposure must not be at the top of the list for managed retreat on the Islands. The community will need to rely heavily on central government funding to manage their risks from climate change.</p> <p>It is important for managed retreat to have equitable outcomes throughout New Zealand. Vulnerable communities, like those on the islands, will need more Government assistance to achieve the same outcomes as those in less vulnerable positions.</p>
53. Are there other principles and objectives you think would be useful? Please explain why.	The principle to limit the Crown’s fiscal exposure could be amended to targeting the Crown’s financial exposure to helping the most vulnerable communities.
54. Do you agree with the process outlined and what would be required to make it most effective?	The Chatham Islands Council agree with the overall process set out in the consultation document. the Council has concerns relating to the planning and preparation step. The Chatham islands are entirely reliant on central government funding for our planning processes. The government have not, to date, been willing to fund the implementation of the essential freshwater package and we would need a guarantee that the same issue ill not arise with planning and preparation of managed retreat. the Council are also not in a financial position to fund relocation, land acquisition, or clean up.
55. What do you think could trigger the process? What data and information would be needed?	The process should be triggered by the mechanisms outlined in the consultation document.
56. What other processes do you think might be needed, and in what circumstances?	There may be a need for special processes covering Māori land and culturally important sites, especially those containing human remains.
57. What roles and responsibilities do you think central government, local government, iwi/Māori, affected communities, individuals, businesses, and the wider public should have in a) a managed retreat process? b) sharing the costs of managed retreat?	<p>a) Everyone should be involved in the process. it is essential that any solutions involving managed retreat are developed collaboratively. The council agree the central government should be involved in the process where there is a high level of risk, urgency, or significant hardship.</p> <p>b) The Chatham islands Council is not in the financial position to fund the process of managed retreat. we will be reliant on considerable central government funding.</p>
58. What support may be needed to help iwi/Māori, affected communities, individuals, businesses and the wider public participate in a managed retreat process?	Māori and Moriori communities will need support to identify and manage risks to cultural sites, marae, housing and mahinga kai sites. They may need funding to increase the resilience of those sites and go through a manged retreat process if necessary.

	<p>Affected communities will need support to assess risks and identify options for managed retreat. They will also need financial assistance to participate in the process.</p> <p>The Council itself will need support to identify and manage the risks of climate change. we will need good data and guidance on how to progress through the process.</p>
<p>59. A typical managed retreat will have many costs, including those arising from preparation (including gathering data and information), the need to participate in the process, relocating costs and the costs of looking after the land post-retreat. In light of your feedback on roles and responsibilities (Q57), who do you think should be responsible for or contribute to these costs?</p>	<p>The Chatham Islands Council is not in a position to finance the costs associated with managed retreat. Central Government funding will be required for this work.</p>
<p>60. What do you consider the key criteria for central government involvement in managed retreat?</p>	<p>Central Government is likely to need to be involved in all managed retreat processes on the Chatham islands.</p>
<p>61. There may be fewer options for homes and community buildings (eg, schools, churches, community halls) to move than businesses (eg, retail and office buildings, factories, utilities) for financial, social, emotional and cultural reasons. That may suggest a different process for retreat, and different roles and responsibilities for these actors. Should commercial properties/areas and residential properties/areas be treated differently in the managed retreat process? Please explain why.</p>	
<p>62. Even in areas where communities are safe, local services and infrastructure, such as roads, power lines and pipes may become damaged more frequently and be more expensive to maintain because of erosion or increases in storms and rainfall, for example. Local councils may decide to stop maintaining these services. Are there circumstances in which people shouldn't be able to stay in an area after community services are withdrawn?</p>	<p>Infrastructure in the Chatham Islands is extremely vulnerable to the effects of climate change. Most of the roading network is on low-lying land close to either the coast or to the Whanga lagoon and is therefore at risk of flooding.</p> <p>The drinking water supplies for Waitangi and Kaingaroa townships are vulnerable. Waitangi relies on a groundwater bore which is at risk of inundation with salt water as the sea level rises. Kaingaroa is supplied from a freshwater lake that was severely depleted in the last period of drought. As droughts increase in frequency and intensity, alternative sources of drinking water will be needed.</p>

	<p>Power lines and cell phone towers are at risk in winds. Diesel and petrol supply rely on sea freight which could be less reliable as severe weather events become more common.</p> <p>Maintenance and replacement of infrastructure is much more expensive on the islands than it is on mainland New Zealand because of the cost of freight and of getting specialist labour and equipment over to the Islands.</p>
63. In what situations do you think it would be fair for you to be required to move from where you live?	
64. Many residential communities are made up of a combination of renters, owner/occupiers and people who own a property and use it as a second/holiday house. Do you think there are reasons for these groups to have different levels of involvement in a managed retreat process?	
65. It is not always obvious that an area is at high risk from natural hazards or the impacts of climate change. However, council risk assessments and increased data and information should make these risks clearer. Do you think there different approaches should be taken for those who purchased properties before a risk was identified (or the extent or severity of the risk was known) and those who bought after the risk became clear?	<p>There is very little sale and purchase of property on the Chatham Islands. It is unlikely that new development would take place in an area that is identified as at risk.</p>
66. Under what circumstances do you think it would be fair or necessary for government to take different approaches with a greater or lesser degree of intervention or support?	
67. How do you think land with historical, cultural, social or religious significance (eg, cemeteries or churches) should be treated?	<p>There is a significant amount of land on the Chatham islands with identified historical and cultural values. This land will need a careful approach when it comes to managed retreat.</p> <p>Two iwi (imi) are tāngata whenua on the Chatham islands. Hokotehi Moriori Trust have completed their treaty settlement process, while Ngāti Mutunga o Wharekauri trust are still in the settlement process. Both iwi (imi) will have land holdings and statutory acknowledgement areas as a result of the settlement process. There is also a considerable amount of Māori land on the islands. It will be important to carefully consider how these</p>

	<p>land areas can be protected as managed retreat from this land could breach the Treaty of Waitangi.</p> <p>The consultation document recognises that climate change is likely to have a disproportionate effect on Māori communities as they tend to be in remote locations, have low economic status and be situated in coastal areas. All of these conditions are true on the Islands, and their remoteness is extreme.</p>
<p>68. Some Māori communities, both inland and coastal, have needed to relocate as a result of events (including natural disasters) that have impacted their marae and wāhi tapu. These examples show that Māori communities are aware of the ways that climate change is affecting their marae, papa kāinga and wāhi tapu, and how relocation can be approached as a community, with engagement from iwi, hapū, and whānau. The examples also demonstrate that climate change is impacting coastal communities as well as inland communities located closer to rivers and lakes. How do you think managed retreat would affect Māori?</p>	<p>Hokotehi Moriori Trust has built their marae at Kopinga on a hill overlooking Lake Huro. The marae is unlikely to need relocation.</p> <p>Ngāti Mutunga o Wharekauri Trust do not currently have a marae on the Islands. Their treaty settlement is still progressing. The subsequent placement of a marae will need to be carefully considered. Te One, where the trust owns some housing, is at a very low elevation and is probably unsuitable for a marae. The trust's housing as well as the Te One school are likely to need to be relocated as the sea level rises.</p> <p>There is a great deal of Māori land on the Islands and loss of this land as a result of managed retreat could be seen as a breach of the Treaty of Waitangi.</p> <p>There are many important cultural sites that are at risk from climate change, especially those close to the coast or the shores of Te Whanga lagoon. Management of these sites will need to be carefully considered.</p>
<p>69. Managed retreat has rarely occurred in Aotearoa, especially within Māori communities. However, there are examples of Māori proactively working to protect their marae, papa kāinga and wāhi tapu by either relocating or protecting and developing their current sites. In these instances, the focus was on protecting and preserving their taonga for future generations. What do you see as being most important in developing a managed retreat system for iwi/hapū/Māori?</p>	<p>The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.</p>

<p>70. Māori land and Treaty settlement land have unique legislative arrangements. Restrictions and protections are placed on Māori land to meet a clear set of principles and objectives that recognise the cultural connection Māori have with the land and a specific focus on land retention and utilisation. Treaty settlement land that has been acquired through Treaty settlement processes is most likely to have cultural significance to a particular iwi or hapū and used to support the aspirations of their people. How do you think Māori land (including Treaty settlement land) should be treated?</p>	<p>The Council do not want to comment on issues that need to be directly talked through with tāngata whenua.</p>
<p>71. How do you think post event insurance payments could help support managed retreat?</p>	
<p>72. Should insurability be a factor in considering whether the Government should initiate managed retreat from an area?</p>	