



Te Kāwanatanga o Aotearoa
New Zealand Government

Summary of submissions on the draft Geothermal Strategy

OCTOBER 2025



**MINISTRY OF BUSINESS,
INNOVATION & EMPLOYMENT**
HĪKINA WHAKATUTUKI

Ministry of Business, Innovation and Employment (MBIE) Hīkina Whakatutuki – Lifting to make successful

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Cover image: Mud pools in Rotorua, New Zealand.
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Summary of Submissions on the Draft Geothermal Strategy

Summary

This document provides a summary of submissions on *From the Ground Up — A draft strategy to unlock New Zealand's geothermal potential* (the draft strategy). The Ministry of Business, Innovation and Employment (MBIE) undertook consultation on the draft strategy between 30 July and 12 September 2025.

Thank you to those who took the time to provide a submission. Your insights and input will help us establish a long-term strategic approach to guide the sustainable development and utilisation of geothermal resources in New Zealand.

A total of 59 submissions were received from a diverse range of stakeholders including commercial entities (20), iwi/Māori organisations (12), individuals (12), industry bodies (7), local government/regional economic development agencies (4), and academia/research institutes (4).

Submissions reflected broad support for the draft strategy's vision and goals, with many submitters acknowledging the draft strategy's potential to unlock geothermal opportunities across New Zealand. Many supportive submitters called for items in the action plan to be undertaken sooner and backed by funding.

One iwi submission clearly opposed the draft strategy, arguing it failed to recognise their customary rights in Te Ahi Tāmou (geothermal resources) and calling for Crown engagement.

Five central themes emerged from across the submissions:

1. Economic enablement and regional development
2. Strategic governance and regulatory reform
3. Treaty of Waitangi partnership, Māori rights and interests and integration of indigenous knowledge (or mātauranga Māori)
4. Environmental stewardship and sustainability
5. Geothermal data issues

MBIE is currently using the submissions to help inform further development of the strategy, and will then provide advice on the final strategy to the Minister for Resources for decision.

Methodology for submission analysis

The consultation submission form posed eight questions to help submitters focus their responses on specific points of interest. These questions were:

1. Are the three strategic outcomes of the strategy, centred around world-leading geothermal innovation, accelerating energy resilience and strengthening regional economies and te Ōhanga Māori, suitable, or is there more we need to consider?
2. Do the five overarching action plan goals capture the areas that are most important for achieving the vision, strategic outcomes and energy goal?
3. Does the proposed action plan correctly capture the necessary government interventions and priorities?
4. Is the role for the sector clear? How can the wider geothermal sector play a role (eg are there specific actions that the sector could own?)
5. Does the strategy and proposed action plan create the right settings to enable tāngata whenua to realise their aspirations for geothermal resources in their rohe?

6. Are there opportunities for our geothermal sector that we haven't considered?
7. Are there challenges for our geothermal sector that we haven't considered?
8. Are there any other things that the strategy should include or exclude?

The MBIE project team reviewed all submissions to identify and collate themes, using a mix of qualitative and quantitative approaches. Internal reviews ensured consistency and accuracy of the submissions analysis and summary.

The qualitative approach involved reading all submissions to identify the most frequent themes from submissions. The quantitative approach involved quantifying key themes and descriptive statistics.

Who we heard from

MBIE received 59 submissions from a range of submitters, summarised in Figure 1.

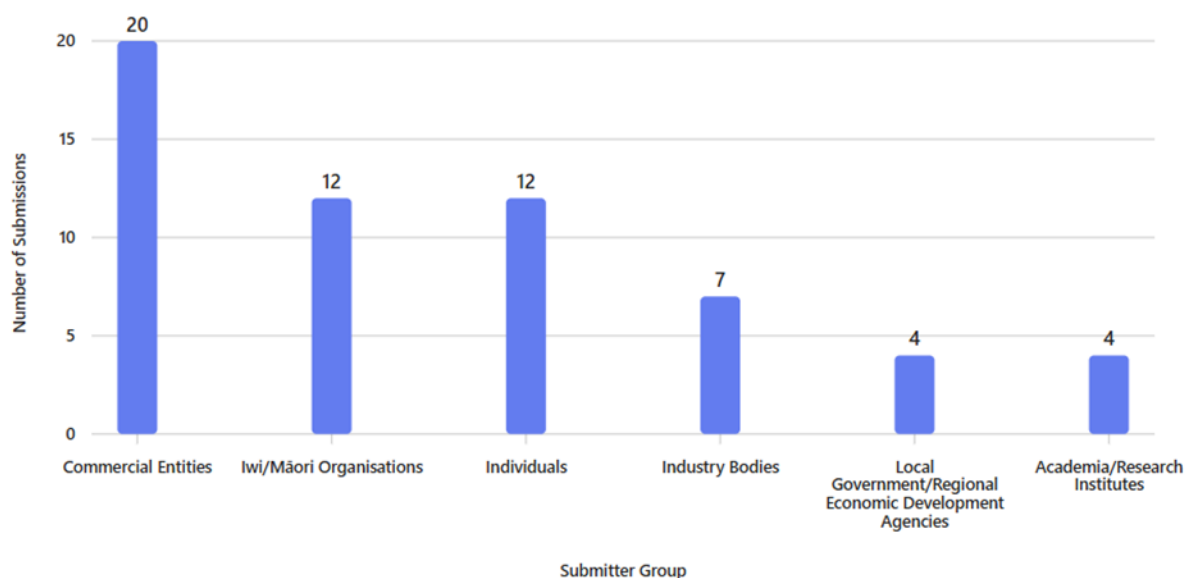


Figure 1: Number of submitters by category

This summary provides an overview of key points raised across the submissions and is not an exhaustive list of all issues that were raised. We have named some specific submitters as examples, but this is not a full list of all submitters. Where submitters agree, MBIE will publish submissions on the draft strategy at a later date.

Five central themes emerged from the submissions

Economic enablement, innovation and regional development

Many submissions emphasised the value of geothermal resources as a driver of regional economic development, and there was support for the idea of place-based geothermal clusters, Māori-led geothermal enterprises, and the development of broader metrics to capture social and economic benefits, including non-extractive uses like tourism and wellness, and geothermal biotechnology.

Eleven submitters, including commercial entities and research institutions, called for greater investment in innovation, with proposals ranging from establishing a national geothermal

innovation cluster to supporting breakthrough technologies, Māori-led projects, and subsurface exploration. Many of the commercial submitters also stressed the importance of commercial incentives, including de-risking measures, co-investment models, and direct funding to support iwi-led development.

Strategic innovation opportunities such as mineral recovery (eg lithium and silica), biotech applications, and cascade use of geothermal resources were identified, with calls for feasibility studies, pilot projects, and commercialisation pathways.

Workforce development emerged as a priority for twelve submitters. There were calls for a dedicated workforce and education pillar, with long-term capability targets, co-funded training, and accredited pathways, particularly in geothermal drilling. Several of these submitters, including iwi and Māori organisations, highlighted the need for Māori capability development, including scholarships, regional training, co-investment models, and the integration of mātauranga Māori to build a sustainable and inclusive geothermal workforce.

Strategic governance and regulatory reform

Many submissions highlighted the need for strategic governance and regulatory reform. At least six commercial and local government submitters called for streamlined consenting and updates to relevant regulations. There were also several calls to develop a National Policy Statement (NPS) and National Environmental Standard (NES) for geothermal.

Seven submitters from across the categories recommended bringing forward key actions from the action plan. Some submitters suggested improvements to better support the strategy's goals, including adding new strategic outcomes, funding the action plan, accelerating timelines, and clarifying roles and implementation structures.

Treaty of Waitangi partnership, Māori rights and interests, and integration of indigenous knowledge (or mātauranga Māori)

At least 15 submitters from across categories emphasised the centrality of tino rangatiratanga and the need for genuine partnership with Māori, including Māori leadership and the integration of mātauranga Māori across all elements of geothermal governance, planning, monitoring, and decision-making. Key themes in these areas from across the submissions include:

- The foundational role of settlements in the relationship between iwi and the Crown, and with respect to geothermal resources.
- The key role settlements have in shaping the role of iwi in geothermal policy, management and development.
- Whakapapa connections to geothermal resources, and the importance of the strategy recognising those relationships, including a description/acknowledgement of a mātauranga Māori view of geothermal energy.
- The past destruction of geothermal taonga and the importance of sustainable use to protect taonga, including the incorporation of cultural and environmental values. For some, this would include the incorporation of mātauranga Māori in any assessment of potential impacts.
- The ongoing Wai 2358 inquiry and Māori Treaty claims to geothermal resources.

Environmental stewardship and sustainability

The importance of environmental stewardship and sustainability were central themes for 11 submitters, including iwi, academia/research institutes, and regional authorities. Many of

these submitters called for a more integrated approach to protecting the wider ecological health of geothermal systems.

There were also calls to embed sustainability as a strategic outcome and adopt culturally informed monitoring, as well as caution regarding the deployment of next-generation technologies like supercritical geothermal.

Geothermal data issues

Data issues were highlighted by 14 submitters, who generally advocated for greater access to data for all users. Proposals in the submissions included a centralised geothermal data repository, public access to historical data, and heat mapping to support low-temperature geothermal uptake. A 'national geothermal data platform' governed by shared standards and mandatory data contributions was also recommended.

Views on open data sharing were mixed. The majority of those who raised the issue supported the development of a centralised repository (10 submitters suggested having a centralised geothermal data repository), while five submitters expressed concerns.

Several submitters (including Māori and other submitters) raised concerns about data sovereignty, particularly for Māori.

What we heard from specific submitters

Commercial entities

We broadly categorised geothermal companies and commercial users, energy/electricity generation and other companies as "commercial entities". There were 20 submissions in this category. The feedback from these submitters generally emphasised enabling investment, accelerating innovation, and reforming regulatory frameworks to unlock the full potential of New Zealand's geothermal sector.

Commercial entities generally expressed strong support for the draft strategy's overarching goals, particularly the ambition to double geothermal energy use by 2040. They consistently called for more targeted government interventions to de-risk early-stage exploration and development, including co-investment models, tax incentives, and streamlined consenting pathways.

Several commercial entities advocated for the modernisation of relevant regulations. Contact Energy and Mercury New Zealand both called for updates to the Geothermal Energy Regulations (1961) and other health and safety regulations.

Innovation was also a recurring theme in submissions by commercial entities, with calls to broaden the draft strategy's focus beyond supercritical geothermal to include enhanced and advanced geothermal systems (EGS/AGS), low-temperature applications, mineral recovery, and hybrid technologies.

Some commercial entities stressed the importance of balancing environmental sustainability with development, advocating for lifecycle assessments, reinjection standards, and the integration of circular economy principles. For example, Mercury New Zealand recommended refining Strategic Outcome 1 to better reflect sustainability and innovation, especially in reservoir management and emissions reduction.

Several commercial entities such as Contact Energy, Canistra Limited, and Eastland Generation also submitted that a Geothermal Centre of Excellence is needed to drive research, development, and workforce training, with some proposing international

collaboration and export-oriented strategies to position New Zealand as a global leader in geothermal services and technology.

The importance of data access and governance was also frequently raised, with recommendations to establish a centralised geothermal data repository and improve transparency around data ownership and sharing. Mercury New Zealand caveated their suggestion regarding a data repository with the proviso that any centralised geothermal data repository must have regard to the commercial sensitivity of certain datasets.

Commercial entities emphasised the need for workforce development, including the creation of structured training pathways and support for Māori and regional participation. Three commercial entities mentioned ageing/retiring geothermal workforce, emphasising the need for workforce development to mitigate health and safety risks associated with skills gaps.

Feedback by a subset of commercial entities involved in electricity generation and transmission (Eastland Generation, Transpower, Mercury New Zealand, Contact Energy, Ngati Tuwharetoa Geothermal Assets) included:

- Direct funding for Māori-led exploration to accelerate geothermal development
- The need for anticipatory network investment to support geothermal growth, regulatory enablement, and geothermal career pathway development
- Revising the energy target to differentiate between geothermal heat use and geothermal electricity production, and reflecting these targets in “real terms”
- Government support for geothermal innovation, and accelerating regulatory reform and geothermal field reclassification to enable development and unlock capacity, and
- Government funding to de-risk early-stage geothermal exploration and field reclassifications, and commercial incentives for baseload generation, coordinated investment in science, research and development, and workforce development.

Iwi/Māori organisations

Submissions from 12 iwi, hapū, ahu whenua trusts and Māori organisations provided comprehensive and consistent feedback emphasising the centrality of tino rangatiratanga, kaitiakitanga, and the integration of mātauranga Māori in the management of geothermal resources.

The New Zealand Māori Council (NZMC) submitted in support of the overall vision and outcomes of the draft strategy but raised a number of concerns and proposals to strengthen the strategy. They suggested that the pathways to achieving the outcomes in the strategy need to be more specific, further developed, and incorporate Māori leadership. The NZMC also raised the issue of overlapping Māori interests and claims in geothermal resources.

The NZMC advocated that the systemic barriers that prevent Māori from participating in geothermal development should be addressed, including lack of access to historical and current geothermal data, high cost of exploration and drilling, regulatory complexity, and limited access to capital. The NZMC advocated for government funding to de-risk geothermal resources, to support Māori landowner aspirations. They also suggested role clarity for the sector, recommended an integrated approach that involves a Geothermal Centre of Excellence, and geothermal development that is sustainable and genuinely culturally aligned.

Many iwi/Māori submitters emphasised the importance of the Crown upholding its Treaty obligations in developing the strategy. In addition, some submitters called for recognition of customary rights. There were also calls for mātauranga Māori to be integrated in planning and monitoring. Many iwi/Māori organisations advocated for co-governance models, early

and meaningful engagement with iwi and hapū, and the establishment of clear pathways for Māori leadership, co-investment, and benefit-sharing in geothermal development.

Key barriers identified by iwi/Māori organisations, including the NZMC, include limited access to capital, technical expertise, and geothermal data, as well as regulatory complexity. To address these issues, they recommended targeted funding for Māori-led exploration and development, the creation of geoheat information packages, and capacity-building initiatives such as wānanga and tailored training pathways. Environmental and cultural protection were also highlighted, with calls for comprehensive monitoring frameworks that incorporate both scientific and cultural knowledge, and for caution in the deployment of next-generation technologies like supercritical geothermal.

Several iwi/Māori organisations also supported the development of a NPS and NES for geothermal to ensure consistent national direction and safeguard Māori interests. There was also support for a Geothermal Centre of Excellence with strong Māori representation. One iwi submission suggested the strategy should incorporate facilitation of Māori energy sovereignty – for example “innovation” should incorporate mātauranga Māori, “energy resilience” should include Māori energy sovereignty, and “strengthening te Ōhanga Māori” should include intergenerational equity and tino rangatiratanga.

Several iwi/Māori submitters urged for Māori to be treated as strategic leaders involved in meaningful co-design of the strategy, not just collaborators, and called for energy sovereignty.

The Ngāti Tahu–Ngāti Whāoa Collective supported the draft strategy’s vision and outcomes, while recommending stronger national direction through a NPS and a NES to ensure consistency across regions. It urged prioritising field reclassification, modernising geothermal mapping, and establishing a Crown-led exploration fund. It also recommended a national geothermal data backbone to enhance efficiency and updating regulatory tools to ensure they are fit for purpose to support emerging technologies.

Raukawa emphasised that the strategy should ensure geothermal resources are managed in a way that sustains their long-term resilience, provides certainty for investors, ensures benefits are realised across communities and generations, and gives practical effect to the Crown’s commitment to uphold Treaty settlements. Raukawa suggested embedding resilience and sustainability within the strategic outcomes, recommending environmental baselines that “include ecological health, biodiversity, and cultural values” and embed mātauranga Māori and Māori data sovereignty alongside scientific data.

Raukawa also advocated for including how the principle of kaitiakitanga would be given practical effect and equitable benefit sharing arrangements in the final strategy. They emphasised the importance of stable, sustainable policies for investment. Wairākei Ahī Tāmou Rōpū noted the negative impacts of the development of the Wairākei Power Station on geothermal taonga in their rohe, seeking that the lessons learned from past developments be heeded. They recommended integrating environmental and cultural baselines and incorporating mātauranga in determining what are considered sustainable environmental limits, and supported taking a holistic intergenerational approach to the management of their geothermal taonga.

Several Māori entities, including Ngāti Tahu–Ngāti Whāoa Rūnanga Trust, raised concerns about the risks of rapid geothermal expansion and supercritical technologies, including land subsidence, resource depletion, and loss of surface features.

Taheke 8C supported the intent of the draft strategy and the 2040 geothermal growth goal, and suggested ways to strengthen the strategy. They called for urgent national direction on geothermal development, including a firm commitment to a NPS for geothermal development and a supporting NES to standardise field classifications and avoid inconsistent regional rules. It recommended shifting classification reviews to the strategy's first horizon, establishing a Crown exploration and research and development fund with a dedicated Māori landowner stream, modernising geothermal feature mapping, and completing a national geothermal data backbone. Other suggestions Taheke 8C provided included updating regulatory tools, coordinating geothermal growth with infrastructure upgrades, supporting direct-use clusters in Taupō and Tarawera, and ensuring transparency through named leads and timelines for all action plan items.

Te Tumu Paeroa/the Māori Trustee recommended the final strategy describe and acknowledge a mātauranga Māori view and include funded wānanga and an indigenous-led research alliance. The Māori Trustee also recommended a focus on sustainability in the strategic outcomes. The Māori Trustee also recommended that any regulatory or policy changes to support sustainable geothermal development must also expressly include requirements to monitor ongoing environmental and cultural impacts of geothermal energy generation. Such monitoring must be informed by robust scientific practice, iwi and hapū mātauranga and engagement with Māori freehold landowners where applicable.

The Wellington District of the New Zealand Māori Council stressed the importance of equity in access to data, capital, and training and recommended including Māori knowledge in the Geothermal Centre of Excellence.

In their submission, Te Kotahitanga o Ngāti Tūwharetoa stated their opposition to the draft strategy for failing to recognise Māori customary rights in Te Ahi Tāmou (geothermal resources). Te Kotahitanga o Ngāti Tūwharetoa called for the Crown to properly engage with them and to recognise their customary rights.

Individuals

Feedback from 12 submitters categorised as “individuals” reflected a diverse range of perspectives. Across these submissions there was a strong focus on environmental sustainability, cultural integrity, and community involvement.

Many individuals expressed support for geothermal development but emphasised the need for safeguards to prevent overexploitation, such as annual extraction caps, and ecological monitoring.

Several submitters highlighted the importance of cultural and ecological values, advocating for iwi and hapū-led monitoring programmes, co-governance arrangements, and the integration of mātauranga Māori into decision-making processes. Concerns were raised by one submitter about the potential impacts of geothermal drilling on residential areas, with calls for clearer communication channels and accountability mechanisms for affected communities.

Some submitters also stressed the need for transparent planning, public engagement, and scientific communication to build trust and understanding of geothermal energy's role in New Zealand's energy future.

Some proposed the development of a “geothermal system health index” to track the cultural and ecological performance of geothermal fields, while others recommended explicit targets for geothermal's contribution to renewable energy. One individual submitter said the strategy should also include “cultural outcomes” such as the number of co-governance agreements

by 2030, and describe environmental benefits relative to other energy sources, including carbon emissions.

The role of Māori in geothermal development was a recurring theme in individual submissions, with calls for meaningful involvement in governance, monitoring, and benefit-sharing, as well as funding for small-scale, community-led projects to enhance local energy equity.

Industry bodies

Submissions from seven industry bodies provided detailed feedback focused on ensuring the geothermal sector's long-term sustainability, inclusivity, and alignment with broader national objectives.

The New Zealand Geothermal Association (NZGA) called for concrete mechanisms, including a geothermal workforce working group to support the development of a future-ready geothermal workforce. Similarly, Women in Geothermal New Zealand (WING NZ) called for a dedicated strategic outcome and action plan goal focused on workforce development, specifically aimed at developing a “diverse, gender-inclusive and skilled workforce”.

NZGA highlighted the need for the certain actions in the action plan to be accelerated and forming a collaborative strategy finalisation group, to achieve the goal to doubling geothermal energy use by 2040. NZGA also proposed the strategy draw on the United Nations Framework Convention on Climate Change (UNFCCC's) National System of Innovation model and advocated for the establishment of a Geothermal Centre of Excellence.

The Business NZ Energy Council recommended ensuring that any spatial planning that helps to enable geothermal activity should not do so at the expense of “other activities” and suggested that changes should not be made to industrial allocations within the Emissions Trading Scheme (ETS) to improve the uptake of geothermal heat.

Energy Resources Aotearoa (ERA) said they “fully support” the further development of geothermal energy but submitted that the strategy should only include proposals that are systems-based and fuel agnostic and should not prioritise geothermal over other sources. ERA also questioned how the 2040 goal would be met and questioned the ambition for New Zealand to be a world leader in geothermal innovation, suggesting it may be preferable to be a “fast follower”.

Academia/research institutes

The four submissions from academia/research institutes broadly supported the draft strategy's overarching goals, while calling for greater clarity, specificity, and alignment between research, policy, and industry. Three of these submitters highlighted the need for the strategy to adequately support Māori-led development to support the objective of strengthening te Ōhanga Māori.

The Geothermal Institute at the University of Auckland highlighted the importance of workforce and education, recommending a fourth outcome in this area be added as well as greater investment in the scientific and educational underpinnings of the sector, including the idea of a national geothermal innovation fund. The Institute also supported the idea of a Centre of Excellence.

They also emphasised the importance of open access to geothermal data, including legacy datasets, and proposed a centralised data platform governed by clear standards and protocols.

Earth Sciences New Zealand (ESNZ) suggested the final strategy would benefit from sitting below an overarching energy strategy. ESNZ also recommended the final strategy should more clearly articulate the roles and responsibilities of government, industry, iwi and other stakeholders, and should be supported by a well-resourced implementation plan.

ESNZ also proposed a fourth strategic outcome focused on environmental stewardship and sustainability of geothermal resource utilisation. They submitted that support for te Ōhanga Māori does not come through strongly in the current action plan, and that the final strategy should include targeted support for Māori-led projects.

Local government/regional economic development agency

The four local government/regional economic development agency submissions expressed support for the draft strategy's direction while recommending changes to ensure effective implementation, regional alignment, and environmental stewardship. While both groups supported reform, councils focused more on governance and sustainability, whereas EDAs stressed economic opportunity and immediate action. These submissions highlighted the importance of standardising and streamlining regulation, including the adoption of national consenting pathways to reduce regional inconsistencies and enable development.

The views of regional councils and regional economic development agencies on field classification were nuanced. Waikato Regional Council and Te Uru Kahika Geothermal Working Group highlighted the importance of sustainable management of geothermal systems and the statutory role of regional councils in setting geothermal system classifications. They recommended that the final strategy should signal that any changes to system classifications should be evidence-based and supported by investment in resource characterisation and system delineation. In contrast, RotoruaNZ emphasised the urgency of reclassifying fields to unlock investment and support Māori-led development, recommending that this work be brought forward to the strategy's first horizon.

Environmental and cultural considerations were central to the feedback, with calls to protect unique geothermal features, balance tourism and industrial development, and integrate cultural heritage and mātauranga Māori into planning and monitoring frameworks.

The feedback also included suggestions for supporting public-private partnerships, early-stage funding for feasibility studies, and capacity-building for tāngata whenua, particularly in governance and technical roles, clear implementation responsibilities, long-term funding structures, and metrics beyond energy output, such as job creation, emissions reduction, and regional economic growth.

Waikato Regional Council, RotoruaNZ, Amplify (Taupō's economic development agency), and the Te Uru Kahika Geothermal Working Group emphasised the importance of regional leadership, particularly in geothermal-rich areas like Taupō and Rotorua, and called for the establishment of a national geothermal hub to support research, innovation, and workforce development.

Waikato Regional Council and Te Uru Kahika Geothermal Working Group highlighted the crucial importance of protecting natural geothermal features and called for recognition of non-extractive values like biodiversity and tourism, and site-specific governance with local leadership.

RotoruaNZ and Amplify emphasised the strategic importance of Rotorua and Taupō as hubs for geothermal innovation. They advocated for place-based clusters, streamlined consenting, and feasibility funding to unlock Māori enterprise and attract heat-intensive industries through initiatives like geoheat innovation precincts and circular economy models. Amplify also proposed a national geothermal hub in Taupō, supported by public-private partnerships to de-risk innovation and accelerate uptake.

Next steps

MBIE is currently using the submissions to help inform further development of the strategy, and will then provide advice on the final strategy to the Minister for Resources for decision.

Where submitters agree, submissions on the draft strategy will be published on the MBIE website at a later date.



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