

Friday, 12 September 2025

Environment Committee  
Parliament Buildings  
**WELLINGTON**

E ngā mana, e ngā reo, rau rangatira mā

## **SUBMISSION ON “FROM THE GROUND UP” – A DRAFT STRATEGY TO UNLOCK NEW ZEALAND’S GEOTHERMAL POTENTIAL**

### **Introduction**

1. This submission is provided on behalf of the following Ngāti Tahu – Ngāti Whāoa entities (the “**NTNW Collective**”):
  - (a) Ngāti Tahu – Ngāti Whāoa Rūnanga Trust (“**Rūnanga**”)
  - (b) Tauhara North No.2 Trust (“**Tauhara North**”)
  - (c) Ngāti Tahu Tribal Lands Trust
  - (d) Paeroa South B2B1 Trust
  - (e) Tahorakuri A1 Sec 33 Ahu Whenua Trust
  - (f) East Z Trust
  - (g) Te Toke Marae
  - (h) Mataarae Marae
  - (i) Ohaki Marae; and
  - (j) Waimahana Marae.
  
2. The draft Geothermal Strategy for New Zealand (“**Strategy**”) sets out the Ministry for Business, Innovation and Employment’s (“**MBIE**”) vision to place Aotearoa as a global leader in sustainable geothermal development (“**Vision**”). MBIE proposes that the Vision can be achieved by securing three strategic outcomes (“**Outcomes**”).

3. In short, the NTNW Collective supports the Vision and Outcomes set out in the Strategy, which demonstrate forward thinking in relation to geothermal energy. The Strategy demonstrates how integral geothermal taonga already are to energy production, and how important they can be in contributing to decarbonisation and energy security. This submission provides specific feedback on how the NTNW Collective believes the Strategy's Vision can best be given effect within our rohe by utilising the existing strategic framework and direction governing our geothermal taonga.

### **General Comments**

4. As an overview, the NTNW Collective stress our position that the Strategy represents a positive starting point in its emphasis on the importance of geothermal energy. The Strategy appears to appreciate that this importance is multifaceted, applying to various uses and capabilities including low grade heat, high energy capacity, carbon sequestration, heat transfer, mineral exploration and bacteria extremophiles exploration.

### **Rohe-Specific Feedback**

5. The NTNW Collective also note that the Strategy has the potential to enhance the existing tangata whenua relationships to geothermal taonga within our rohe. The NTNW Collective have held mana whenua over our geothermal taonga anchored by ahi kā roa since our tūpuna arrived Tahu Matua in 1250AD.
6. Today, within our rohe based around Reporoa in the Central North Island, the NTNW Collective still retain approximately 11,000 acres of land within the Taupō Volcanic Zone (**TVZ**). There are 10 geothermal reservoirs that we use, protect and act as kaitiaki over, just as our tīpuna once did. Those geothermal taonga include (along with the land blocks retained in NTNW Collective ownership under and on which those geothermal systems lie):
  - (a) **Ōrakei Kōrako** - located on and under Tutukau East Z Trust land including Orakei Korako Lands Ltd, a wholly owned subsidiary of Tutukau East Z Trust;
  - (b) **Ohaki** – located on and under Tahorakuri A1 Sec 1 and associated blocks administered by the Ngāti Tahu Tribal Trust;

- (c) **Rotokawa** – located on and under Tauhara North;
  - (d) **Ngatamariki** – located on and under Tauhara North and part of the Tahorakuri block;
  - (e) **Reporoa** – located on and under part of the Paeroa East block and multiple land blocks owned by individual NTNW whānau and ahuhenua land trusts;
  - (f) **Whangairorohea / Broadlands** – located on and under part of the Paeroa East block;
  - (g) **Waiotapu** – located on and under part of the Paeroa East block, with the fee simple title to the Waiotapu Thermal Wonderland owned by the Rūnanga;
  - (h) **Waikite** – located on and under Rotomahana Parekarangi 3A block;
  - (i) **Te Kopia** - located on and under Rotomahana Parekarangi 3A block;  
and
  - (j) **Atiamuri** - located on and under the Tatua West Block.
7. Attached are maps of our rohe (**Appendix 1**) and the geothermal taonga within them (**Appendix 2**).
  8. We are a geothermal people and the NTNW collective have a long history of involvement and experience with utilising, protecting and managing our geothermal taonga that can be enhanced and strengthened through the Strategy.
  9. We currently have four geothermal power stations across our rohe along with various other geothermal related economic and cultural activities including long-standing tourism ventures and cutting-edge scientific research. We believe that the Strategy can help us in our endeavours to further our development of our geothermal taonga as a means of providing economic sustenance, jobs, and the sustainable use of the geothermal taonga on and under our lands for the future.
  10. The NTNW Collective have plans for protection, development, research, and expansion within energy-low grade heat, energy-supercritical, tourism,

carbon capture, food production, data centre development, and other potential projects that are part of our future considerations of geothermal for our rohe. We see the Strategy and the collaboration of government, iwi, land holders, and industry as an attractive environment that is needed in order to encourage the right investment into the right projects.

11. The NTNW Collective believe that our whakapapa, history, geothermal development experience and landholdings collectively place us in a unique position to engage with and further the goals of the Strategy in a substantial manner, and we welcome collaboration alongside the various Ministries with this Strategy. Central government plays an important role in the early stages of geothermal projects through the exploration of new sites, development of technologies, support of new partners, and the establishment of new facilities and industries.
12. These initial stages are the high risk however lower cost barrier entry areas can unlock hundreds of millions and even billions of dollars of downstream investment and job creation. As an iwi who are well-advanced in the development of our geothermal taonga and in joint venture partnerships with our commercial partners, we look forward to partnering with central and local government to engage with early-stage support under the Strategy.

### **Areas for Strengthening the Strategy**

13. While we support the overall Vision and Outcomes set out in the draft Strategy, the NTNW Collective believe there are critical areas where the Crown's strategy could be strengthened. We respectfully recommend that the following matters be given further consideration.

#### ***National Policy Statement for Geothermal Development (NPS)***

- (a) The Strategy refers to exploring "policy direction" but does not commit to a National Policy Statement for Geothermal Development. We recommend consideration be given to developing an NPS in the near-term to provide clear and consistent guidance across regions. Such direction would help Iwi landowners, developers and investors navigate decision-making with greater certainty.

### ***Classification of Geothermal Fields***

- (b) The Strategy identifies field classification work as a longer-term action. We recommend that this classification work be prioritised and completed earlier, as it provides a foundation for decision-making by iwi landowners, industry, and investors.

### ***Crown Exploration and R&D Funding***

- (c) The Strategy highlights the role of Crown involvement in exploration and modelling but does not establish a dedicated exploration and research fund. We recommend that consideration be given to establishing Crown-led funding for early-stage exploration and technology development. Crown support at this stage could help unlock significant downstream investment and job creation.

### ***National Environmental Standard (NES) for Replacement Consents***

- (d) The Strategy does not address the potential for a national-level NES for geothermal replacement consents. We recommend that this be explored further, as an NES could provide consistency across regions and reduce unnecessary duplication or uncertainty in long-standing operations.

### ***Geothermal Features Mapping***

- (e) The Strategy mentions low-heat geothermal mapping, but we recommend that consideration be given to modernising geothermal feature mapping more broadly. Updated mapping would strengthen both protection of taonga and responsible development.

### ***National Geothermal Data Backbone***

- (f) While the Strategy identifies the importance of data, we recommend that completing a comprehensive national geothermal data backbone be made a priority. A centralised,

enduring, and publicly available data system would enhance transparency, support research and investment, and reduce duplication of effort across the sector.

### ***Updating the Regulatory Toolkit***

- (g) The Strategy proposes reviews of legacy regulations, but we recommend this work be prioritised and expanded. Updating the regulatory toolkit in the near term would ensure New Zealand's frameworks are fit for purpose, particularly in light of advances such as supercritical geothermal and other emerging uses.

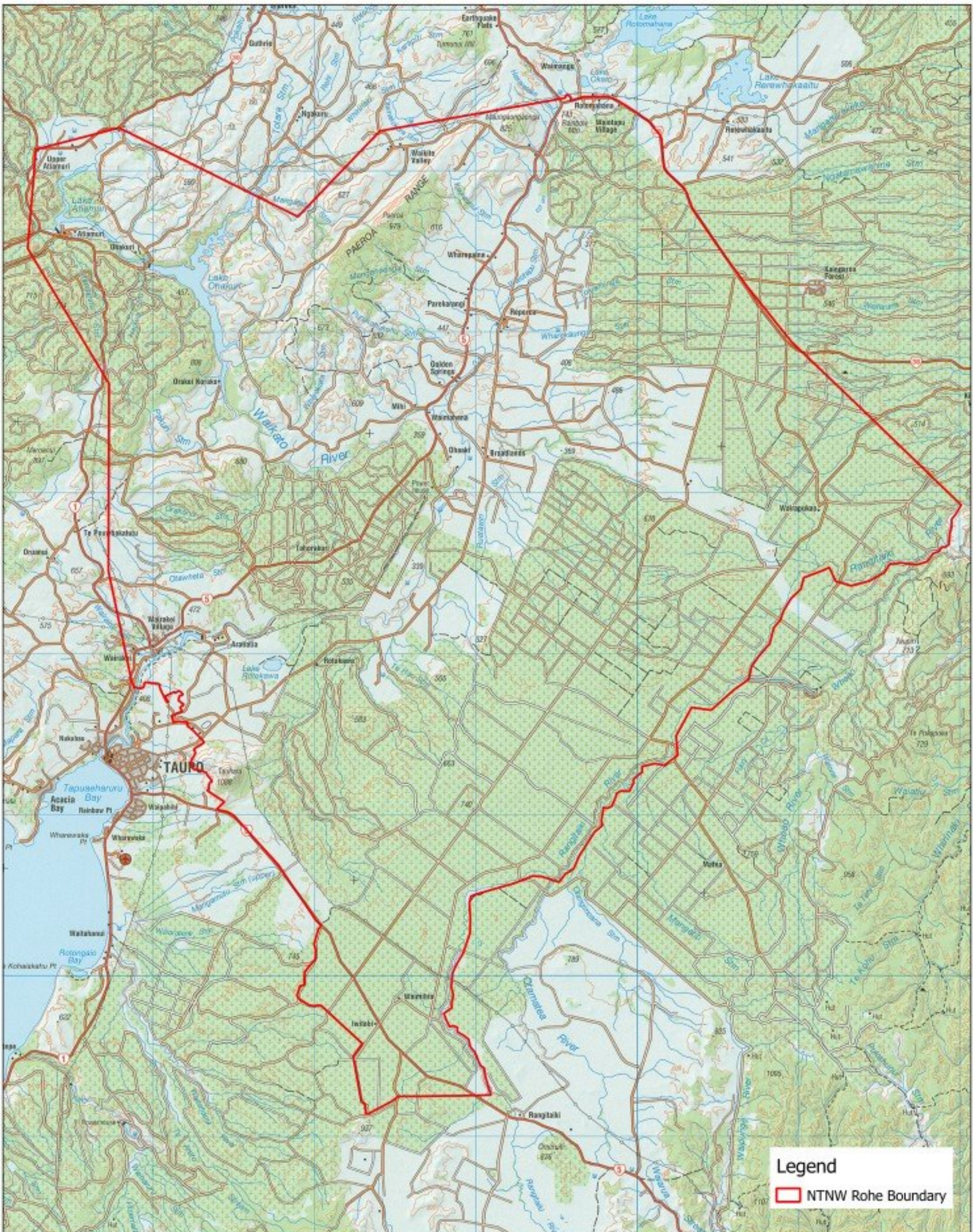
### **Summary of Position**

14. The NTNW Collective encourages and welcomes the Strategy and the new era of investment and vision for our geothermal taonga. In summary, while we see the Strategy as a positive first step, we recommend that the document be expanded to provide greater certainty and direction in these areas. Strengthening the Strategy in this way would help unlock the full potential of geothermal development, while ensuring Iwi landowners, industry, and government are working from a clear and consistent foundation.
15. We believe that the Strategy provides a pathway to give effect to our shared aspirations for our geothermal taonga, and we look forward to working in partnership in order to achieve these goals for the advancement of geothermal energy and also for our country as a whole.

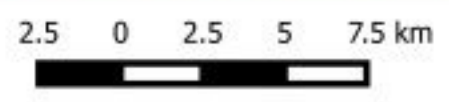
Ngā mihi nui, nā

**Ngāti Tahu- Ngāti Whāoa Collective**

12 September 2025



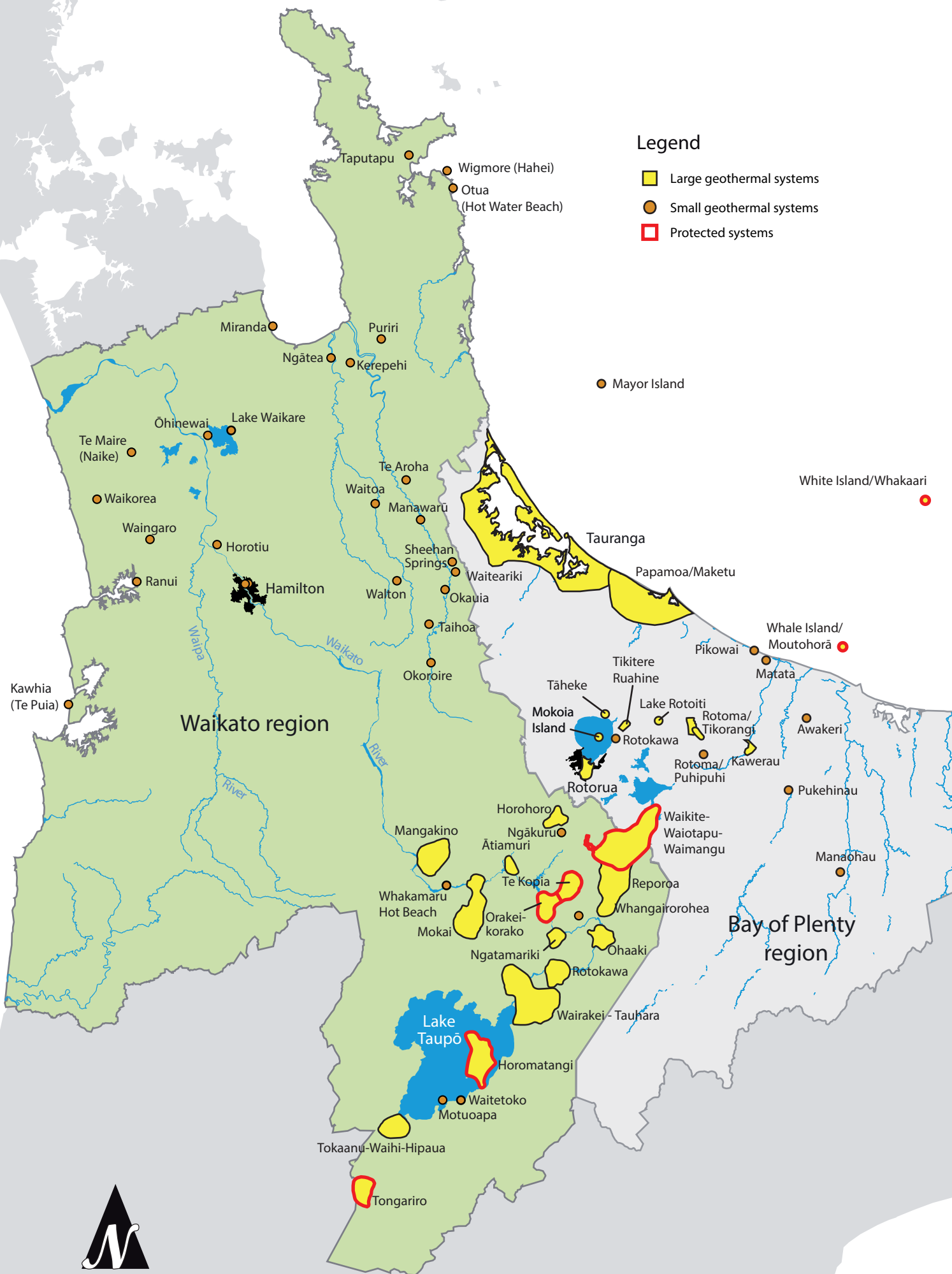
# Ngati Tahu - Ngati Whaoa Rohe



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**Legend**

- Large geothermal systems
- Small geothermal systems
- Protected systems

Mayor Island

White Island/Whakaari

Whale Island/Moutohorā



**Geothermal systems**

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