



NGATI TAHU-NGATI WHAOA  
RUNANGA

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The Ministry of Business, Innovation and Employment  
New Zealand

09 September 2025

## **Submission on A draft strategy to unlock New Zealand's geothermal potential**

### **INTRODUCTION**

1. Please accept this submission on behalf of the Ngati Tahu-Ngati Whaoa Runanga Trust (the Runanga) which refers to A draft strategy to unlock New Zealand's geothermal potential.
2. When Ngati Tahu-Ngati Whaoa Runanga Trust refers to "iwi" in this submission it means the people of Ngati Tahu-Ngati Whaoa
3. The Ngati Tahu-Ngati Whaoa Runanga Trust is the mandated iwi authority for the Ngati Tahu-Ngati Whaoa people
4. From Te Waiheke o Huka (Huka Falls) to the south, we extend east to our pouwhenua at Ngapuketerua beyond the Rangitaiki River, then northward across the plains of Kaingaroa to Wairapukao and further on to Pekepeke. From here we extend to our northern pouwhenua at Maunga Kakaramea, turning west to the Paeroa Range and on to Orakei Korako on the banks of the Waikato River, the birthplace and principal papakainga of Ngati Tahu-Ngati Whaoa. From Orakei Korako we extend further west to Pohaturoa, an ancient pa site. These are the pouwhenua, the geographical marker points that describe the rohe in which Ngati Tahu-Ngati Whaoa is recognised as an iwi with mana whenua
5. Ngati Tahu-Ngati Whaoa is an affiliate to Te Arawa River Iwi Trust which is a Post-Settlement Governance Entity formed in relation to the Ngati Tuwharetoa, Raukawa and Te Arawa River Iwi Act 2010.
6. Ngati Tahu-Ngati Whaoa is also an affiliate to Te Pumautanga Trust which is another Post-Settlement Governance Entity formed in relation to the Affiliate Te Arawa Iwi and Hapu Claims Settlement Act 2008.

**Ka ora te iwi – Ka ora te tangata**

## **SCOPE AND PURPOSE OF THIS SUBMISSION**

This submission provides feedback on the document provided by The Ministry of Business, Innovation and Employment. We do not address all topics in the document; we have outlined our comments below.

## **EXPLANATION OF CURRENT CONTEXT WITHIN RUNANGA ROHE:**

Ngati Tahu-Ngati Whaoa have tino rangatiratanga, mana whakahaere and kaitiakitanga over the geothermal resources within our rohe. We view our resources as a Tupuna and we are the voice for their protection and how they should be managed. We have customary rights and interests in relation to our Geothermal Taonga that lay within our rohe. We have been actively engaged as co-developers and decision-makers in geothermal development, with involvement from early planning stages through to governance and ownership.

The geothermal fields within our traditional rohe include: Rotokawa (Tauhara North), Broadlands (Kaingaroa No.2), Ohaaki (Tahorakuri), Nga Tamariki (Tahorakuri), Reporoa (Paeroa East), Waiotapu (Paeroa East), Waikite (Rotomahana Parekarangi), Te Kopia (Rotomahana Parekarangi), Orakei Korako (Tutukau) Atiamuri (Tatua West) and Wairakei – Tauhara (Tauhara North) .

Te Kopia is considered the most powerful geothermal fumarole currently remaining in New Zealand. It has been identified as a feature of international significance and is recognised as a unique geothermal phenomenon globally. Waiotapu, on the other hand, is renowned as the most colourful and visually striking geothermal area in the country.

In our rohe, many of the geothermal sites were adversely affected by the flooding associated with dam constructions and hydroelectricity development projects. Also, the Ohaki geothermal power station had significant environmental effects, including subsidence leading to flooding. These effects threaten many treasured taonga, including the Ohaki Marae, urupa and wahi tapu. As geothermal fluid was extracted at Ohaki, the steam holes and bathing areas at Te Toke and Ohaki Marae lost water and heat and subsequently stopped functioning. Also, land subsidence, rising river levels, and associated bank erosion now threaten the whare at Ohaki Marae. A sacred rock was flooded. Drilling rigs disturbed the ground in urupa areas, exposing ancestral remains. Natural geyser activity and springs at Wairakei have been irreparably damaged and discharges of geothermal fluid from Wairakei into the river have caused elevated mercury and arsenic levels in kai species, as well as in sediment that has accumulated behind the dams.

The draft geothermal strategy primarily focuses on expanding geothermal use, streamlining regulations, and fostering collaboration with Maori. However, these strategies must align with the

cultural, social, environmental, and geographical values of iwi, rather than overriding them. No legislation and or planning mechanisms should prevent or restrict Ngati Tahu-Ngati Whaoa from exercising our tino rangatiratanga, mana whakahaere and kaitiakitanga over our geothermal taonga and the geothermal strategy should enable this in accordance with our tikanga and kawa.

#### **OUR CONCERNS & RECOMMENDATIONS ON A DRAFT STRATEGY**

- Improving access to geothermal data and insights will be one of a primary focus of this draft strategy- Accessing geothermal data must respect Iwi land rights and any database must ensure Iwi interests and cultural values are respected and are protected. Geothermal data must include Iwi partners in any decision-making process. Also, NTNW Iwi must have ownership of our cultural and resource data, including geothermal data within the rohe. There must be a clear process for Iwi engagement to ensure our interests are protected. This will ensure Iwi retain ownership of what is collected for analysis through intellectual property rights and dissemination of data will only be undertaken with prior approval from the Iwi.

- The draft strategy proposes the identification of geothermal clusters to maximise regional value and deliver broader economic and social benefits. Geothermal clusters may have negative impacts on geothermal fields classified as protected or research leading to catastrophic degradation of these fields and the potential exclusion of Iwi if not governed inclusively. As our people historically domiciled near geothermal features, this could pose a threat to our culturally significant sites. These clusters could also unintentionally create inequities, cultural conflicts, or cause harm to geothermal taonga (treasured resources).

When identifying geothermal clusters, Iwi values must guide decision-making to ensure that development protects taonga, upholds sovereignty and fosters long-term, equitable outcomes for Iwi and our rohe. This requires genuine partnership, cultural respect, and shared leadership at every stage, from site selection to governance and benefit distribution.

- Before undertaking any geothermal activity, or research within the NTNW rohe, developers, researchers, and relevant authorities must engage early and meaningfully with the Runanga and Iwi landowners (ahu whenua) .
- When applying advanced geothermal technologies, Iwi cultural and environmental values must be prioritised to avoid cultural and environmental risk to our valuable resources. Iwi will ensure that we protect the long-term rights over geothermal fluid and land use decisions, especially in light of supercritical development pathways.

Supercritical geothermal technology refers to the use of geothermal fluids that are in a supercritical state, meaning they are under both high pressure and temperature, beyond their critical point. Excessive extraction of geothermal resources can lead to rapid pressure depletion, increased land subsidence, and the degradation or loss of surface geothermal features.

The introduction of supercritical geothermal technology must be aligned with the principles of kaitiakitanga as the potential for rapid resource depletion could conflict with long-term stewardship values, requiring thorough research and iwi consultation and involvement in decision-making. Collaboration between iwi landowners and developers will ensure that Iwi communities share in the benefits of such technology, as equitable partners. This ensures that Iwi lands , resources, and cultural rights are protected and respected at all times.

- Iwi expects co-ownership of projects, access to dedicated funding for iwi-led research, training pathways for iwi members, fair benefit-sharing frameworks, and protection of matauranga Maori. Genuine partnerships, transparency, and long-term capacity building will ensure iwi are not just consulted but empowered as leaders, innovators, and beneficiaries of geothermal development within our Rohe.
- The new system setting must integrate Matauranga Maori including Cultural Impact Assessments where applicable which help assess how geothermal development could affect wahi tapu (sacred places), ancestral relationships, and cultural practices within each field. New regulatory and system setting must aim to ensure iwi are involved in the monitoring, governance, allocation, and protection of culturally important sites. This must be done in partnership with iwi, recognizing our mana whenua and honouring Treaty obligations. Streamlined regulations must not neglect cultural and environmental considerations that affect iwi and our rohe and must ensure that iwi are not bypassed in any part of the process.
- Ngati Tahu- Ngati Whaoa maintain that geothermal fluid beneath our whenua is the property of the Ahu Whenua or other Iwi Land Trust, who own the land. Ahu Whenua must not be bypassed through any regulations developed to fast-track development and attract investment. Without these protections, iwi will vehemently oppose any development of geothermal fields on our lands.

Naku noa, na

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