



Feedback from

Raukawa

To

Ministry of Business, Innovation and Employment

On

From the Ground Up: A draft strategy to unlock New Zealand's geothermal potential.

18 September 2025

18 September 2025

The Geothermal Strategy team
Resource Policy
Ministry of Business, Innovation & Employment – Hikina Whakatutuki

email: resourcesfeedback@mbie.govt.nz

Tēnā tātou katoa,

Raukawa feedback on NZ Draft Geothermal Strategy

1. INTRODUCTION

- 1.1.** Raukawa thanks the Crown for the opportunity to provide feedback on the consultation document “*From the Ground Up: A draft strategy to unlock New Zealand’s geothermal potential National*” [draft geothermal strategy]. This feedback on the consultation document is made on behalf of the Raukawa Settlement Trust [RST] and the Raukawa Charitable Trust [RCT] on behalf of the Raukawa iwi.
- 1.2.** RST represents 17 marae (16 mandated marae and 1 community-based marae complex) and is the post-settlement governance entity for Raukawa. The RCT is mandated by RST, as the iwi authority, to represent Raukawa on all environmental matters.
- 1.3.** Raukawa’s 16 mandated marae are located across four traditional pou whenua: Te Pae o Raukawa, Wharepūhanga, Maungatautari and Te Kaokaoroa O Pātetere. These four areas include Mōkai, Atiamuri, Whakamaru, Mangakino, Arapuni, Tokoroa, Putāruru, Tīrau, Tapapa, Matamata, Kēmureti (Cambridge), Kihikihi and Te Awamutu. This network provides Raukawa with deep, place-based relationships, trusted community connections, local knowledge, and a strong boots-on-the-ground presence across the takiwā.
- 1.4.** Our rohe encompasses significant geothermal fields (Mōkai, Atiamuri, Tokoroa, Whakamaru, Mangakino, Arapuni, Putāruru, and wider Waikato catchments). These taonga are expressly recognised within our Treaty settlement instruments, including statutory acknowledgements, geothermal acknowledgements, deeds of recognition, and overlay classifications.
- 1.5.** Raukawa is a Treaty partner with enduring co-management arrangements over the Waikato River through Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy [Te Ture Whaimana]. These instruments sit alongside geothermal acknowledgements and obligations embedded in the Raukawa Claims Settlement Act 2014.
- 1.6.** Our Treaty settlement arrangements include:
 - a. A comprehensive settlement of our historical Treaty of Waitangi claims as set out in the Deed of Settlement dated 2 June 2012 and given effect to by the Raukawa Claims Settlement Act 2014 [the Raukawa settlement].

- b. The co-management arrangements for the Waikato River and its catchment as set out in the 17 December 2017 Deed and the Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010 [the Waikato River arrangements].
 - c. The Central North Island forests collective iwi settlement as set out in the 25 June 2008 Deed of Settlement and the North Island Forests Land Collective Settlement Act 2008 [the CNI settlement]; and
 - d. Interests in several other settlement arrangements, including fisheries settlements and co-management arrangements for Te Waihou River that are provided for in the Hauraki collective settlement.
- 1.7.** Our river settlement arrangements include specific acknowledgement that ‘the settlement is intended to enhance the ongoing relationship between Raukawa and the Crown’ (in terms of the Te Tiriti o Waitangi, its principles, and otherwise).
- 1.8.** Included in our settlement arrangements are several instruments that were designed to enhance the Raukawa-Crown relationship in the context of the terms and principles of Te Tiriti. The aim of these is to grow a true partnership for all matters relating to social, cultural, environmental, and economic outcomes for our iwi, hapū and marae.
- 1.9.** This includes mechanisms such as Joint Management Agreements [JMA’s] within our takiwā, accords with several Crown agencies (including MBIE) and Ministers, overlay classifications, statutory acknowledgements, geothermal statutory acknowledgements, and deeds of recognition, the establishment of the Waikato River Authority [WRA], and the creation of Te Ture Whaimana.
- 1.10.** Under the Raukawa Claims Settlement Act 2014, geothermal resources are explicitly recognised as taonga within our rohe. The Act and its associated Deed of Settlement record the Crown’s acknowledgement of Raukawa’s enduring relationship with geothermal resources, including statutory acknowledgements over the Waikato and Waipā Rivers, its catchment and its geothermal features. These provisions affirm that geothermal resources within our takiwā — including those in the Mangakino area — are of cultural, spiritual, and historic significance, and require that decision-makers formally recognise this relationship in planning and consent processes.
- 1.11.** For Raukawa, these settlement commitments provide the durable foundation for our role in geothermal policy, management, and development. They also establish expectations of early engagement, notice, and participation whenever geothermal resources are considered for exploration, allocation, or development. This expectation is reinforced through the Energy and Resources Accord we hold directly with MBIE, which provides a further platform for government and Raukawa to work together on geothermal and wider energy issues.
- 1.12.** As the Crown develops the draft geothermal strategy, it is essential that these acknowledgements and accords are not treated as peripheral but are integrated as part of the core framework that will guide future decisions.
- 1.13.** Raukawa provide thematic feedback on the consultation questions, recognising opportunities for geothermal innovation and regional growth, while also identifying risks and systemic tensions across the draft strategy, Resource Management reform, and emerging minerals and electricity policy. Our feedback focuses on ensuring environmental integrity, upholding treaty settlement commitments, and strengthening investor and community confidence.

Strategic Outcomes

- 2.** Raukawa’s vision for geothermal resources is that the landscapes and sites within our takiwā are understood in depth, safeguarded through sound management, and valued as taonga whose mauri and mana are actively enhanced.
 - 2.1.** This vision seeks to bring together Raukawa mātauranga and contemporary science as complementary knowledge systems, guiding both the protection and the use of geothermal resources for the benefit of our communities. In this way, geothermal development is not only a source of energy and innovation, but also an expression of intergenerational responsibility, cultural identity, ecological stewardship and economic opportunity.
 - 2.2.** The intent of our treaty settlement arrangements is that geothermal resources are managed in ways that sustain their mauri and enable our responsibilities as kaitiaki. Raukawa are of the view that the strategic outcomes should create intentional pathways for iwi to exercise these roles, ensuring that geothermal development reflects both cultural and ecological values alongside economic use.
 - 2.3.** Raukawa acknowledge the three outcomes set out in the draft strategy: world-leading geothermal innovation, accelerated energy resilience, and strengthened regional economies and te Ōhanga Māori. These are sound aspirations and align with the broader direction of transition to a low-emissions future.
 - 2.4.** However, as currently drafted, Raukawa are of the view that the outcomes do not yet demonstrate how principles such as stewardship (kaitiakitanga), sustainability, and fair allocation will be given practical effect. For example, while the draft geothermal strategy refers to upholding the principles of kaitiakitanga, it does not yet identify the responsibilities, pathways, or measures that would be needed to carry those principles through into management and allocation decisions.
 - 2.5.** One important pathway where these principles can be embedded is in the area of research, science, and innovation. The emerging frontier of supercritical geothermal exploration provides an opportunity to demonstrate how stewardship (kaitiakitanga), knowledge integration, and fair participation can be put into practice.
 - 2.6.** By grounding innovation in a framework that protects environmental integrity, integrates indigenous and scientific knowledge systems, and creates fair opportunities for iwi participation, the geothermal strategy can show how world-leading geothermal innovation is achieved in a way that is durable, credible, and widely supported. Without this integration, Raukawa is of the view that there is a risk the outcomes may be perceived as narrow or unstable; with it, the outcomes become a shared achievement that strengthens both community trust and investor confidence.
 - 2.7.** Raukawa also note that the draft geothermal strategy positions itself within wider government priorities such as economic growth, energy security, infrastructure delivery, regulatory efficiency, and emissions reduction. These are important and complementary objectives, Raukawa are of the view that policy tensions are beginning to emerge as the pace and scale of reform increases.
 - 2.8.** For example, the emphasis on regulatory efficiency through fast-track consenting could, if not carefully managed, create challenges for maintaining environmental safeguards and ensuring appropriate local input. Likewise, ambitions to double renewable electricity generation and expand process heat solutions, while positive for the energy transition, may increase cumulative

pressure on geothermal fields unless resilience and governance are explicitly built into the outcomes.

- 2.9.** These tensions are particularly relevant in the Waikato and Waipā catchments, where Te Ture Whaimana is the *primary direction-setting document*. Te Ture Whaimana sits above all national policy statements and planning documents. Where there is any inconsistency, Te Ture Whaimana prevails. Ensuring that the geothermal strategy is consistent with Te Ture Whaimana is therefore not optional; it is essential to give durable effect to the objectives of restoring and protecting the health and wellbeing of the river systems and their catchments. Recognising and addressing these emerging tensions within the outcomes framework would provide durable direction, giving both industry and communities confidence that growth will be balanced with long-term environmental sustainability.
- 2.10.** Finally, Raukawa acknowledge the reference to the ongoing Waitangi Tribunal inquiry (Wai 2358). While this acknowledgement is welcomed, broader government priorities have not always given effect to Tribunal findings in a genuine way or at all. Embedding resilience, stability, and fairness within the strategic outcomes would provide assurance that such findings can be translated into durable law and policy, rather than being noted without implementation.
- 2.11.** Raukawa is of the view that the strategic outcomes would be strengthened through the addition of a fourth outcome that explicitly signals resilience, stability, and long-term confidence in the geothermal sector.
- 2.12.** With that in mind, Raukawa propose the following wording for consideration:

“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.”

- 2.13.** This outcome would complement the existing three by creating intentional pathways for durable management and by signalling that government, iwi, and industry share a responsibility to steward these resources wisely. It would also provide space for future strategies and regulatory frameworks to address important cross-overs — such as natural resource allocation, the interface with critical minerals, and emerging hydrogen opportunities — in a way that is coherent, transparent, and supportive of long-term investment. While those frameworks are still evolving, anchoring a strategic outcome in resilience and stability now would ensure the geothermal sector is positioned to adapt confidently as policy develops

The Action Plan Goals

Action Plan Goal 1: Improving access to geothermal data and insights

- 3.** Raukawa is supportive of Action Plan Goal 1, which recognises that unlocking geothermal potential begins with better access to data. Establishing a baseline of publicly available information, and identifying gaps, will help reduce uncertainty, foster competition, and catalyse new development opportunities.
- 3.1.** At present, however, Raukawa are of the view that there is a significant data gap relating to the environmental baseline of geothermal systems — including ecological health, biodiversity, and

cultural values. Addressing this gap is essential if data insights are to provide a full picture of opportunities and risks.

- 3.2.** To strengthen this goal, Raukawa recommends that environmental stewardship be embedded as a core dimension of geothermal data and insights. Embedding mātauranga Māori and Māori data sovereignty alongside scientific and industry data systems will ensure geothermal planning integrates cultural overlays with advanced modelling and technical mapping. By doing so, the geothermal strategy will not only catalyse interest and reduce uncertainty, but also unlock development that is responsible, enduring, and aligned with community and environmental expectations.
- 3.3.** A spatial planning approach provides the mechanism to put these integrated data insights into practice. Raukawa is of the view that it will provide an integrated framework for land and resource use across our rohe. Embedding spatial planning into data and mapping initiatives would allow geothermal development to proceed with clear early signals of where opportunities are appropriate and where wāhi tapu, cultural landscapes, or sensitive ecosystems must be protected.
- 3.4.** As noted above, in the Waikato and Waipā catchments, this approach must also give effect to Te Ture Whaimana. Anchoring spatial planning in Te Ture Whaimana ensures that geothermal development contributes to the restoration and protection of river, tributaries and catchment health and wellbeing. This approach reduces the risk of late-stage conflicts, streamlines decision-making, and gives investors and communities greater certainty that projects can proceed with social licence intact.
- 3.5.** While spatial planning and robust environmental baselines can help identify opportunities early, it is also important to recognise the well-documented environmental risks associated with geothermal development. Addressing these risks openly will ensure that the sector can grow in a way that maintains community confidence and environmental integrity. Key risks include:
 - a. aquifer contamination from geothermal fluids containing arsenic, boron, mercury, and other trace elements.
 - b. surface water impacts where discharges raise river temperatures or introduce toxic loads, affecting indigenous species and mahinga kai.
 - c. induced seismic activity linked to reinjection under pressure, which, while often small in scale, can erode community confidence if not well-managed.
 - d. land subsidence caused by unbalanced extraction and reinjection, which can damage wetlands, river margins, and infrastructure.
 - e. cumulative field pressure declines where multiple operators draw down the same reservoir without integrated management, risking long-term viability.
- 3.6.** Embedding these risks into baseline data collection will not only protect ecosystems and cultural landscapes but will also provide early warning systems and clearer risk profiles for investors. With stronger environmental baselines, developers can assess and price risk more accurately, communities can trust that taonga will be safeguarded, and the Crown can demonstrate durable policy settings that balance growth with sustainability.
- 3.7.** Beyond Aotearoa's own context, there is also an important opportunity to draw on international experience. As the draft geothermal strategy notes, Aotearoa has forged partnerships with Indonesia, the Philippines, Africa, and the Caribbean. These relationships provide a valuable

platform to learn from both successes and challenges in geothermal development, ensuring that Aotearoa’s strategy is globally informed and resilient.

- 3.8.** Each region offers lessons that are directly relevant to New Zealand’s future direction:
- a. Indonesia’s reinjection practices have stabilised declining fields and demonstrate the importance of technical discipline in sustaining reservoir performance.
 - b. The Philippines has grappled with community tensions where environmental risks were underestimated, underscoring the need for transparency and early engagement.
 - c. African and Caribbean projects show how proactive data sharing and community dialogue can build investor confidence and strengthen local support.
- 3.9.** Integrating these lessons into New Zealand’s own data, environmental baselines, and spatial planning frameworks would both enhance our international leadership and reduce the risk of repeating mistakes seen elsewhere. By combining domestic stewardship with global insights, the data and insight’s goal becomes more than a technical exercise. It becomes the foundation for responsible management, globally informed best practice, and durable confidence for investors and communities alike.
- 3.10.** Raukawa recommends that Action Plan Goal 1 be strengthened to:
- a. address the current data gap by embedding environmental baselines into geothermal datasets, including ecological health, biodiversity, and cultural values.
 - b. integrate indigenous knowledge systems and Māori data sovereignty alongside scientific and industry data, ensuring data frameworks are robust, inclusive, and enduring.
 - c. adopt a spatial planning approach within data and mapping initiatives, providing early clarity on where development is appropriate and where wāhi tapu, cultural landscapes, or sensitive ecosystems must be protected.
 - d. anchor spatial planning in Te Ture Whaimana o Te Awa o Waikato in the Waikato and Waipā catchments, ensuring geothermal development actively contributes to restoring and protecting river health and wellbeing.
 - e. embed risk identification into baseline data collection, including aquifer contamination, induced seismicity, land subsidence, and cumulative pressure decline, to provide early warning systems and clear investor risk profiles.
 - f. leverage international partnerships (Indonesia, the Philippines, Africa, the Caribbean) to integrate global lessons into New Zealand’s data and planning frameworks, enhancing investor certainty and community confidence.

Action Plan Goal 2: Ensuring Regulatory and System settings are fit for purpose
--

- 3.11.** Raukawa support the inclusion of regulatory certainty as a critical enabler for geothermal growth. As Aotearoa looks toward new frontiers such as supercritical geothermal development and the potential recovery of critical minerals from geothermal brines, clarity in regulatory settings will be central to unlocking these opportunities in a way that is both durable and inclusive. For us, regulatory certainty is not simply about efficiency; it is about creating the stability that gives investors’ confidence, provides communities with assurance that environmental values will be safeguarded, and ensures that Treaty settlement commitments are upheld as part of the sector’s long-term foundation.

- 3.12.** In this context, the way the Crown gives effect to certainty is as important as the principle itself. Consistency across related reforms — including the Resource Management framework, the Minerals Strategy, and emerging hydrogen regulation — will be key to avoiding fragmentation and mixed signals. Investors, iwi, and communities alike will be looking for a coherent system that provides clarity on rights, responsibilities, and pathways for development.
- 3.13.** For Raukawa, this also means ensuring that certainty is grounded in practice at the local level. The draft strategy identifies Mangakino as a potential development zone, which sits within our takiwā. Early engagement on exploration or development in this area, consistent with our settlement acknowledgements, would provide a practical example of regulatory certainty in action — one that reduces risk, fosters investor confidence, and demonstrates durable partnership between Crown, iwi, and industry.
- 3.14.** The Minerals Strategy to 2040 adds another important dimension by identifying geothermal brines as a potential source of critical minerals such as lithium and silica. These opportunities highlight the interconnections between energy, minerals, and environmental management. However, the regulatory setting remains unclear. It has not yet been established whether these activities will be governed under the Crown Minerals Act, the Resource Management framework, or a hybrid approach. Unless this interface is clarified, there is a risk that parallel regimes emerge, creating uncertainty for investors, iwi, and communities.
- 3.15.** This uncertainty is compounded by the broader suite of reforms currently underway. Resource Management reform, multiple National Policy Statements, the Minerals Strategy, and emerging hydrogen regulation are all advancing in parallel. Without deliberate alignment, these overlapping directions risk fragmenting the very policy landscape that Action Plan Goal 2 seeks to stabilise. Instead of catalysing innovation and investment, they could increase hesitation, elevate risk premiums, and weaken trust. For Raukawa, coherence across these frameworks is the single most important factor in determining whether this goal succeeds. A forward-looking geothermal strategy should therefore signal how these regimes will be integrated in a way that is durable, transparent, and supportive of long-term investor and community confidence, while ensuring the Crown continues to uphold Treaty settlement commitments.
- 3.16.** Raukawa recommends that Action Plan Goal 2 be strengthened to:
- a. provide coherence across overlapping reforms — including RM reform, the Minerals Strategy, Crown Minerals Act, national policy statements, and emerging hydrogen regulation — to avoid fragmented regimes and ensure a stable, transparent framework.
 - b. clarify pathways for frontier opportunities, including supercritical geothermal and mineral recovery from geothermal brines, with clear settings for allocation, ownership, and benefit-sharing.
 - c. recognise Te Ture Whaimana o Te Awa o Waikato as the prevailing direction-setting framework for the Waikato and Waipā catchments, ensuring that regulatory certainty is grounded in durable settlement commitments and environmental objectives.
 - d. engage early with iwi in development zones (such as Mangakino in the Raukawa takiwā) where settlement acknowledgements apply, to reduce future risk and strengthen durable partnerships.
 - e. link regulatory certainty directly to investor and community confidence, recognising that clear, coherent, and durable settings will unlock investment while also safeguarding environmental and cultural values.

Action Plan Goal 3: Advancing knowledge and uptake of geothermal technologies

- 3.17.** Raukawa is generally supportive of action plan goal 3. We agree that advancing knowledge and uptake of geothermal technologies is central to unlocking the next phase of Aotearoa’s energy transition. Opportunities exist in areas such as supercritical exploration, industrial and district heat applications, agricultural uses, biotechnology, and the recovery of minerals from geothermal brines. These frontiers have the potential to strengthen energy security, diversify regional economies, and position New Zealand as a global leader in sustainable energy innovation.
- 3.18.** The effectiveness of this goal will be greatly enhanced by supporting the integration of Te Ao Māori knowledge systems with contemporary science and technology. Advancing geothermal uptake presents an opportunity to build collaborative frameworks that combine localised, place-based understandings with advanced technical approaches. This is particularly important where projects are close to wāhi tapu, cultural landscapes, or environmentally sensitive areas. Embedding indigenous knowledge systems alongside scientific insights provides a holistic foundation for decision-making, helping to ensure uptake is responsible, sustainable, and aligned with community and environmental wellbeing, while also strengthening investor confidence.
- 3.19.** Geothermal also has significant potential to enable iwi participation beyond tourism, particularly in industrial decarbonisation, food production, and local energy resilience. Realising this potential will (as acknowledged in the draft geothermal strategy) require sustained investment in feasibility studies, pilot projects, and education initiatives that involve iwi as genuine partners in design and delivery.
- 3.20.** The draft strategy’s focus on targeted education, feasibility assessments, and demonstration projects is a positive step. For Raukawa, these initiatives represent opportunities to create structured pathways for iwi to contribute leadership, expertise, and investment. Embedding iwi in these activities will help ensure that benefits flow into iwi communities, build enduring regional resilience, and create durable social licence.
- 3.21.** Unlocking these frontiers cannot be achieved through Crown–industry partnerships alone. The strategy should provide intentional pathways for iwi co-investment and public–private partnerships (PPPs), particularly where geothermal resources are located on or near Māori land. Structured partnerships that combine indigenous knowledge systems, scientific innovation, and capital investment will share risks, distribute benefits more fairly, and strengthen the long-term resilience of the sector.
- 3.22.** Raukawa recommends that Action Plan Goal 3 be strengthened to:
- a. Integrate indigenous and scientific knowledge systems to guide geothermal innovation and uptake, especially in sensitive areas.
 - b. embed iwi leadership and partnership in feasibility studies, pilot projects, and education initiatives, ensuring that benefits flow directly into iwi communities.
 - c. create intentional pathways for iwi co-investment and PPPs, enabling structured partnerships that combine knowledge, innovation, and investment.
 - d. align workforce initiatives with regional transitions, ensuring local communities have the skills to participate fully in geothermal opportunities and reducing reliance on overseas expertise.

Action Plan Goal 4: Enabling place-based geothermal clusters

- 3.23.** Raukawa is generally supportive of this goal. We agree that regional geothermal clusters can create strong opportunities for innovation, investment, and localised benefits by connecting heat users, landowners, iwi, councils, and industry around shared infrastructure and services. When designed well, clusters can catalyse industrial decarbonisation, food and fibre processing, and local energy resilience. Their success, however, will depend on whether the planning system enables clusters to develop in ways that are environmentally durable and socially legitimate.
- 3.24.** As currently proposed, there is a risk that RM reform settings could work against the intent of clusters. The new system is expected to introduce combined plans for each region, nationally standardised zones and provisions, fewer activity categories, and higher thresholds for when adverse effects must be managed. While these changes are aimed at streamlining processes, they may reduce the ability to recognise geothermal-specific opportunities and risks at the local level. If planning tools are too rigid or generic, clusters may be disabled rather than enabled.
- 3.25.** For Raukawa, the solution is not to loosen environmental controls but to strengthen them in a way that provides certainty. Place-based clusters should be supported by planning frameworks that apply tightened adverse-effects gateways, clear environmental limits, and robust monitoring baselines. Far from deterring investment, these safeguards give investors' confidence that projects are environmentally sustainable, reduce litigation risk, and build durable social licence.
- 3.26.** This approach is also consistent with Te Ture Whaimana o Te Awa o Waikato — the Vision and Strategy — which is the primary direction-setting document for the Waikato and Waipā Rivers and catchments. Te Ture Whaimana prevails over any inconsistent provisions in national policy statements or plans. For clusters located within these catchments, alignment with Te Ture Whaimana is therefore essential to ensure geothermal development actively contributes to the restoration and protection of the river's health and wellbeing.
- 3.27.** A cluster model also relies on integrated knowledge systems. By combining indigenous knowledge systems with scientific and technical data in spatial planning, clusters can identify early where opportunities are most viable and where wāhi tapu, cultural landscapes, or sensitive ecosystems must be protected. This integration reduces risk and enables more credible, efficient decision-making.
- 3.28.** Finally, clusters should be seen not only as opportunities for infrastructure, but also as platforms for regional workforce development and skills transition. Training local people to operate and maintain cluster assets will deliver enduring community benefits and reduce reliance on overseas expertise. This aligns with the objectives of the National Infrastructure Plan and supports long-term regional resilience.
- 3.29.** Raukawa recommends that Action Plan Goal 4 be strengthened to:
- a. align cluster planning with environmental integrity.
 - b. ensure coherence with RM reform by making geothermal clusters visible in combined regional plans, while retaining flexibility for site-specific opportunities and risks.
 - c. require alignment with Te Ture Whaimana for all clusters within the Waikato and Waipā catchments, recognising its status as the primary direction-setting document that prevails over inconsistent provisions.

- d. integrate indigenous and scientific knowledge systems into cluster spatial planning to identify viable opportunities and protect sensitive cultural and ecological values.
- e. establish early engagement protocols for development zones within settlement areas (such as Mangakino in the Raukawa takiwā) to ensure settlement obligations are upheld and risks minimised.
- f. enable PPPs and iwi co-investment as core features of cluster development, ensuring risks and benefits are shared and social licence is strengthened.
- g. invest in regional workforce transition, with training and pathways that allow local communities to take up new geothermal opportunities.

<p>Action Plan Goal 5: Driving science, research and innovation including supercritical geothermal technology</p>
--

- 3.30. Raukawa is generally supportive of action plan goal 5. We agree that investment in science, research, and innovation is essential to maintaining New Zealand’s leadership in geothermal development. The Crown’s \$60 million commitment to supercritical geothermal exploration, along with the establishment of a governance group, provides a strong foundation for advancing next-generation technologies.
- 3.31. These frontiers present opportunities to transform New Zealand’s energy system. Supercritical exploration could significantly increase output from smaller resource areas, while mineral recovery from geothermal brines and biotechnology applications may open new revenue streams and global partnerships. Realising these opportunities, however, will depend on ensuring that research pathways are inclusive, environmentally responsible, and well aligned across the reformed science system.
- 3.32. Previous programmes, such as *Geothermal: The Next Generation*, demonstrated that gaps between indigenous and scientific knowledge systems can be bridged through collaboration, but also highlighted that resourcing for this integration has been limited. There is an opportunity now to build on these lessons by ensuring that indigenous knowledge systems are not an adjunct to science, but an integral part of how geothermal research is designed, monitored, and applied.
- 3.33. Investment should also extend beyond exploratory drilling to include environmental baseline studies, long-term risk research, and workforce capability development. Novel risks associated with supercritical drilling — including induced seismicity, reservoir stability, and contamination pathways — require careful study and monitoring. Equally, the transition offers a chance to develop regional skills and capability, ensuring that communities such as those in South Waikato, affected by recent job losses, can benefit from new opportunities.
- 3.34. Finally, clarity is needed around how benefits from innovation will be shared. Intellectual property frameworks, data sovereignty, and co-investment pathways are all central to ensuring that iwi and communities are genuine partners in innovation. Embedding equity and transparency into benefit-sharing arrangements will strengthen social licence and investor confidence.
- 3.35. Raukawa recommends that Action Plan Goal 5 be strengthened to:
 - a. resource the integration of indigenous knowledge systems with scientific research, ensuring collaboration is embedded in project design, monitoring, and evaluation.
 - b. invest in environmental baselines and risk science, including studies on induced seismicity, reservoir integrity, and contamination pathways, alongside exploratory drilling.

- c. develop regional workforce capability, aligning geothermal innovation with opportunities for communities experiencing economic transition (such as South Waikato).
- d. clarify benefit-sharing arrangements, including intellectual property, data sovereignty, and iwi co-investment pathways, to ensure innovation delivers equitable outcomes.
- e. align the role of the reformed science system so that Crown Research Institutes, iwi research providers, and MBIE are working to a coherent framework that reduces duplication and maximises impact.
- f. provide transparent reporting on progress in supercritical and related research, covering technical, environmental, cultural, and social outcomes.

Draft Action Plan

4. Raukawa acknowledge the value of the staged Action Plan set out in Horizons 1–3. We support the intention to provide sequencing for data, regulation, technology, and partnerships, and we recognise that many of the proposed actions reflect areas where iwi can play a constructive role. However, as drafted, several actions require strengthening to ensure they uphold Treaty settlement commitments, embed environmental stewardship, and build long-term investor and community confidence.

Actions we support

- 4.1. Raukawa strongly support actions that enhance data transparency and environmental baselines, such as establishing a baseline of publicly available data (Horizon 1) and investigating mechanisms for ongoing data provision (Horizon 2). These initiatives create opportunities to integrate indigenous knowledge systems into national datasets, strengthen spatial planning, and align decision-making with Te Ture Whaimana in the Waikato and Waipā catchments.
- 4.2. Raukawa also support actions to strengthen education pathways and workforce transition (Horizon 2). This aligns directly with our view that investment in geothermal must also be investment in people. For regions such as South Waikato, which have experienced significant job losses with the Kinleith mill closure, geothermal development provides a pathway to resilience. Many of the skills developed in forestry, processing, and manufacturing are transferable into geothermal exploration, infrastructure, and operations. Supporting local workforce transition would deliver on the Government’s regional development objectives while enhancing investor and community confidence.
- 4.3. Raukawa welcome the recognition of public–private partnerships and Centres of Excellence in Horizon 1, as these provide structured opportunities for iwi to contribute leadership, expertise, and investment. Similarly, the focus on transitioning government users to geothermal technologies (Horizon 3) aligns with our vision of broadening uptake into industrial heat, agriculture, and local energy resilience.

Risks and issues

- 4.4. Despite these positive signals, several aspects of the plan present risks that require careful attention:
- a. **Regulatory fragmentation:** Actions to clarify the application of the Crown Minerals Act to minerals in geothermal fluid and to review regulatory frameworks highlight the very uncertainty facing the sector. Without deliberate alignment across RM reform, the Minerals Strategy, hydrogen regulation, and national policy statements, there is a risk of parallel regimes that erode investor confidence and create community mistrust.

- b. **Treaty Settlement integrity:** While the plan notes the ongoing Wai 2358 inquiry, it does not clearly signal how existing settlement commitments — including geothermal acknowledgements within the Raukawa takiwā — will be upheld in development zones such as Mangakino. Early engagement must be embedded as part of the plan’s foundation.
- c. **Environmental stewardship:** References to zoning and spatial planning are welcome, but unless they are anchored in environmental baselines and tightened adverse-effects gateways, there is a risk that clusters proceed without durable safeguards. In the Waikato and Waipā catchments, this must include consistency with Te Ture Whaimana, which prevails over any inconsistent national or regional instruments.
- d. **Equity in science and innovation:** Investment in supercritical geothermal exploration is significant, but unless indigenous knowledge systems are resourced as part of research design and monitoring, the gap between knowledge systems will persist. Benefit-sharing arrangements, intellectual property frameworks, and data sovereignty also require attention to ensure iwi and communities are genuine partners in innovation.

Enhancing opportunities

4.5. To strengthen the Action Plan, the Crown should consider:

- a. embedding iwi partnership from Horizon 1, including in data baselines, regulatory reviews, and Centres of Excellence, so Treaty settlements and iwi responsibilities are recognised at the foundation of the strategy.
- b. anchor place-based clusters in settlement obligations, requiring early engagement in development zones such as Mangakino, and ensuring alignment with Te Ture Whaimana in the Waikato and Waipā catchments.
- c. integrate environmental stewardship into all stages of the Action Plan, embedding ecological, cultural, and social baselines into data, planning, and risk frameworks to give communities confidence that taonga will be safeguarded.
- d. design workforce initiatives to support regional transition, with a focus on communities such as South Waikato, where existing skills can be leveraged into geothermal development.
- e. operationalise PPPs and co-investment models across Horizons 1 and 2, ensuring iwi are not only stakeholders but also partners in advancing geothermal uptake.
- f. resource the integration of indigenous knowledge systems with science, including in supercritical geothermal research, and establish transparent benefit-sharing and data sovereignty arrangements to ensure innovation delivers equitable outcomes.

Conclusion

Raukawa welcomes the development of a national geothermal strategy and acknowledges the opportunity it presents to position geothermal as a cornerstone of New Zealand’s energy future. Success will depend on delivering outcomes that balance economic opportunity with environmental stewardship, and national priorities with the enduring responsibilities of Treaty settlements.

In this submission, we have offered constructive feedback and practical pathways across all five Action Plan goals. Our recommendations focus on embedding environmental integrity, ensuring coherence across regulatory frameworks, supporting iwi partnerships and co-investment, and strengthening regional workforce transitions. Together, these measures provide a foundation for durable investor confidence, resilient communities, and responsible geothermal development.

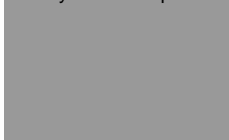
The recent job losses in the South Waikato, including the Kinleith mill closure in Tokoroa, underscore the importance of this transition. Geothermal development can create new pathways for resilience by leveraging existing skills, supporting local communities, and ensuring that investment in energy is also investment in people.

For Raukawa, geothermal resources are both a taonga and an economic opportunity. Their future depends on foresight, balance, and collaboration across government, iwi, and industry. By integrating indigenous knowledge systems with science, strengthening governance frameworks, and upholding Treaty settlement commitments, the strategy can set a global benchmark for sustainable and inclusive energy development. Raukawa is committed to working constructively with MBIE and sector partners to shape a geothermal future that is resilient, inclusive, and anchored in the values and responsibilities we carry as kaitiaki.

Raukawa is committed to working constructively with MBIE and sector partners to shape a geothermal future that is resilient, inclusive, and anchored in the values and responsibilities we carry as kaitiaki.

Ngā mihi,

Privacy of natural persons



Privacy of natural persons

**Group Manager- Pūtake Taiao
Raukawa Charitable Trust**

Privacy of natural persons



Privacy of natural persons

**National Strategy Manager- Pūtake Taiao
Raukawa Charitable Trust**