Taheke 8C Limited

12 September 2025

Resources Policy Team

Ministry of Business, Innovation and Employment

By email: resourcesfeedback@mbie.govt.nz

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

Submitter: Taheke 8C Ltd

Contact: Privacy of natural persons

Purpose

Taheke 8C Ltd (**T8CL**) supports the intent of the draft Strategy and the 2040 geothermal growth goal. We are an actively consenting Māori landowner with a consented geothermal generation project and an adopted Development Plan that enables a wider Energy Hub at and on Taheke land.

Background: Taheke 8C and its development

The Proprietors of Taheke 8C & Adjoining Blocks Incorporation (**Taheke 8C**) is a Māori land incorporation established in 1954. Taheke 8C represents more than 1,200 shareholder whānau and exercises kaitiakitanga while developing its whenua for intergenerational benefit. T8CL is a wholly owned subsidiary of Taheke 8C tasked with implementing its investments.

In partnership with Eastland Generation Ltd, Taheke 8C advanced the Taheke Geothermal Project (**Project**) on its whenua at Ōkere Falls. On 6 November 2024 the Expert Consenting Panel granted full resource consents under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for construction, operation and maintenance of a geothermal power station and associated infrastructure on Taheke land.

The regional consents authorise up to 11,000 tonnes per day (maximum 3.66 Mt/year) of geothermal fluid for electricity generation with reinjection as far as practicable, supported by a comprehensive monitoring, adaptive management and reporting regime.[1]

Scale and benefits: The Project is designed to deliver approximately 35 MW of renewable baseload capacity (around 291 GWh per year), reducing Rotorua District's energy deficit, offsetting thermal generation and conserving hydro storage at peaks. Construction is expected to generate around 120 FTE roles, with ~21 ongoing jobs once operational. Capital investment is estimated at approximately $200 million (with a majority retained in New Zealand).

Energy Hub vision: The Taheke Geothermal Project is the anchor for the Taheke Energy Hub providing direct-use of heat and steam for industrial and horticultural applications, tourism and wellness ventures using cascade energy, complementary hydro, biomass processing powered on site, and optionality for green hydrogen and fuels as markets mature.

Overall position

To actually unlock supply, the Strategy needs to make early decisions, not late investigations. Field classifications and national direction should be decided in the near term, so councils and investors have clear settings. Our experience with Taheke shows that without this, well-advanced Māori projects are delayed by inconsistent overlays and re-litigation of settled matters.

Key changes we seek

Commit to a Geothermal Development NPS in 2025: Replace 'explore policy direction' with a firm commitment to a National Policy Statement (**NPS**) that resets field classifications nationally, aligns regional plan criteria, and requires specific exclusion from other instruments so geothermal REG decisions are not constrained by other NPS unless expressly incorporated. The new NPS geothermal should also be supported by a National Environmental Standard – Geothermal (NES).

Move the classification work to the near term and make decisions: Shift classification review to the Strategy's first horizon and notify national decisions, rather than investigating in the out-years.

[1] See Consent RM24-0449-WT.02, Conditions 2.1–2.5 (quantity and reinjection) and Consent Plan RM24-0449/01 (Site).

Create a Crown exploration and R&D fund: Stand up a fund that can co-invest in de-risking information gaps (including supercritical potential) and support iwi-led development, with a dedicated Māori landowner stream.

National NES Geothermal rule for replacement consents: Adopt a controlled activity pathway nationally for replacement consents for existing authorised geothermal takes and discharges that do not increase total heat abstraction.

Modernise geothermal feature mapping: Direct a national refresh of significant geothermal feature mapping and significance assessments using current evidence to avoid stale overlays blocking development.

Finish the national data backbone: Deliver a central geothermal data repository, including low-temperature mapping, with clear ownership, dates and data-sharing settings.

Update the regulatory toolkit: Clarify Crown Minerals Act coverage for minerals in geothermal fluids and modernise well construction, maintenance and abandonment rules, including for supercritical resources.

Why this matters at Taheke

The Taheke system has an extensive exploration history, granted development consents and an adopted Development Plan. The current "Conditional Development" label no longer fits. The system should be classified as "Development" to reflect the evidence and to avoid conflicts between plan settings and granted consents. Taheke 8C and T8CL seek to reduce their regulatory burden, not add to it.

Evidence base: Taheke 8C has undertaken deep drilling and long-term investigations alongside a Development Plan in the Rotorua District Plan that enables renewable energy and allied activities on the whenua. The Project holds full consents with reinjection as far as practicable and a comprehensive monitoring and adaptive management regime (Sentinel Well, peer review, reservoir/subsidence modelling, annual reporting). These conditions are the same or comparable to frameworks applied on established Group 4 systems.

The Panel's findings confirm sustainable development: modelling supports the proposed average take across injection scenarios, stress-tests indicate capacity above the proposed take, and effects on surface features are managed to no more than minor with adaptive management.

Reclassification: Keeping the Taheke system in Group 3 would duplicate costs, perpetuate uncertainty and risk plan–consent conflicts. The efficient and correct outcome is to reclassify the Taheke system now as Group 4: Development.

Replacement consents: Establish a controlled activity pathway for replacement consents for existing authorised geothermal takes and discharges used for renewable generation. Matters of control should focus on effects management, operational performance, and well integrity. This reduces cost and uncertainty for existing operations while maintaining appropriate oversight.

Risks with sub-Development classifications and the need for national direction

Recent proposals by Council to amend the current Regional Geothermal Plan via Plan Change 11 would have entrenched the Taheke system in a "Conditional Development" tier and layer in additional tests at the regional level. That approach if approved would increase cost and uncertainty and invites re-litigation of matters already resolved through granted consents. At the time Taheke submitted that it was also premature given pending changes to national direction and legislation and lead to duplication and plan–consent conflict for Māori landowners like Taheke 8C.

This is but one example however of local government seeking to change the goal posts once panels consent large scale infrastructure projects. Reflective of a perception and ideology which may not align with the national government perspectives and strategies.

Leaving geothermal classification settings to regional plans alone risks a patchwork of thresholds and methods. Without clear, geothermal-specific national policy, councils can harden rules for systems below "Development," even where a project holds full consents and robust adaptive management. A dedicated Geothermal Development NPS would set consistent national classifications and decision principles, avoiding the current drift to region-by-region rules that raise the bar for Group 2 and Group 3 systems regardless of evidence. The Government is already consulting on new/updated national direction for infrastructure and renewable electricity — a geothermal NPS should sit alongside these to ensure coherence.

There is also a risk that other national instruments are read in ways that unintentionally hinder geothermal development on Māori land when geothermal-specific guidance is absent.

National direction must exclude conflicting NPS for geothermal and renewables

The National Policy Statement for Indigenous Biodiversity (**NPS-IB**) already carves out renewable electricity generation and electricity transmission. Its exclusion clause makes clear that decisions on those activities are not to be second-guessed under the NPS-IB.

That approach should be the model across the national direction, so councils are not left to reconcile competing mandates for the same decision.

What we are asking for:

• A Geothermal Development NPS with an explicit conflicts clause that mirrors the NPS-IB approach — i.e., where a decision concerns renewable electricity generation from geothermal resources or its enabling assets, other NPS that would otherwise apply are excluded unless expressly incorporated. This avoids duplication, contradictory tests, and plan–consent conflict and applicants and councils are not forced to re-litigate reach and applicability each time.

Why is this consistent with current national work:

• The infrastructure and REG workstreams identify inconsistent policies as a core problem that adds cost and delay. A geothermal NPS with a conflicts clause directly addresses that problem.

• Freshwater reforms are being framed to support renewable energy outcomes. Consistence between freshwater direction and a geothermal NPS will help avoid freshwater rules unintentionally blocking consented geothermal projects.

Bottom line: adopt a no conflict approach across national direction so that decisions on geothermal renewable electricity and its enabling assets are taken under geothermal-specific policy, with other NPS excluded unless expressly incorporated. That keeps the focus on the right tests, supports nationally consistent classifications, and prevents councils hardening sub-Development tiers by default.

Other matters MBIE should include

Co-ordinate geothermal growth areas with transmission upgrades and process-heat conversion so new output reaches demand.

Back direct-use clusters in Taupō and Tarawera with place-based pilots for horticulture, tourism and industrial heat alongside iwi partners.

Support ongoing R&D and consenting settings for reinjection and management of non-condensable gases as projects scale.

Publish named owners and delivery dates for every Action Plan item, not just horizons.

Conclusion

The draft Strategy is directionally sound. Delivery depends on decisions taken now. Taheke holds the necessary consents and has a Development Plan that provides for

renewable generation; the project is ready to move from planning to delivery. Retaining a "Conditional Development" classification over the Taheke system would add cost and delay and risk conflict between plan settings and granted consents. Adding to an already significant regulatory burden would stymie hard-earned progress.

The directors of T8CL are available to speak to this submission and to their experience with the geothermal taonga beneath Taheke 8C's land.

Ngā mihi

Privacy of natural persons

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Chair - Taheke 8C Limited (T8CL)

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