

Consultation submission form

From the Ground Up – A draft strategy to unlock New Zealand’s geothermal potential

How to submit using this form

This form is used to provide feedback on the document *From the Ground Up – A draft strategy to unlock New Zealand’s geothermal potential*.

When completing this submission form, please provide reasons explaining your answers. Your feedback provides valuable information and will inform decisions about the final geothermal strategy.

You can submit this form by 5pm, 12 September 2025 by:

- Emailing to resourcesfeedback@mbie.govt.nz with the subject line ‘**Submission on a draft geothermal strategy**’ or
- Posting to:
Submission on a draft geothermal strategy
Resource Policy
Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140

Your feedback will contribute to further development of a geothermal strategy for New Zealand. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

Submitter information

The Ministry of Business, Innovation and Employment (MBIE) would appreciate if you would provide some information about yourself. If you choose to provide information in the section below, it will be used to help MBIE understand how different groups view the draft geothermal strategy. Any information you provide will be stored securely.

A. About you

Name:

Privacy of natural persons

Email address:

Privacy of natural persons

B. Are you happy for MBIE to contact you if we have questions about your submission?

Yes

No

C. Are you making this submission on behalf of a business or organisation?

Yes

No

If yes, please tell us the title of your company/organisation:

Yes, Te Ahi Ka Roa Roopu – Rotorua Village Haukainga (Whakarewarewa, Ohinemutu, Ngapuna, Tarewa) Representatives.

D. Privacy information

The Privacy Act 2020 applies to submissions. Please check the box if you do not wish your name or other personal information to be included in any information about submissions that MBIE may publish.

MBIE may upload submissions, or a summary of submissions, received to MBIE's website at www.mbie.govt.nz. If you do not want your submission or a summary of your submission to be placed on our website, please check the box and type an explanation below:

MBIE can load an "approved" summary of this Ahi Ka Roa submission. The submission summary must be approved in writing from Te Ahi Ka Roa Roopu.

E. Confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential and have stated my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

If you have checked this box, please tell us what parts of your submission are to be kept confidential.

Please ensure all the personal names of the members of Te Ahi Ka Roa Roopu remain strictly confidential under section 9 of the Official Information Act for safety and security reasons.

From the Ground Up – A draft strategy to unlock New Zealand’s geothermal potential

The Government is developing a geothermal strategy for New Zealand to provide a focused pathway to geothermal leadership and growth and unlock the potential of our geothermal resources across a broad range of applications.

New Zealand’s geographical location has given us a unique geothermal advantage, and New Zealand has been a global leader in geothermal development since the late 1950s. Geothermal contributes nearly one-fifth of our annual electricity generation, is a strong tourism attraction, and geothermal heat and steam are utilised both directly and indirectly in industrial, commercial and residential applications.

However, despite our world-class resource, geothermal development faces some barriers, including high upfront drilling costs, fragmented access to data, complex and dated regulatory settings and the scale of the sector. New technologies, such as supercritical geothermal, are also on the horizon. In order to drive the energy resilience, regional development, economic growth and climate leadership, deliberate and coordinated action is required.

The draft strategy sets out a vision for New Zealand to be a global leader in sustainable geothermal development. Three interconnected strategic outcomes, centred around being a world-leader in geothermal innovation, accelerating energy resilience, and strengthening regional economies and te Ōhanga Māori, have been identified to guide action and focus. Five action plan goals have been identified to guide the Government’s approach, underpinned by a draft action plan. The draft strategy also includes an energy-focused goal to double the use of geothermal energy by 2040.

We are seeking feedback on the draft strategy, particularly whether the proposed direction, ambition and outcomes, and accompanying action plan, capture the necessary government intervention and priorities. We are also interested in views about how the wider geothermal sector can contribute to unlocking our geothermal potential.

Please see the draft geothermal strategy for more information, available on our website:

<https://www.mbie.govt.nz/have-your-say/consultation-on-a-draft-geothermal-strategy-for-new-zealand>

Questions for the consultation

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?

1. Yes, the Crown cannot risk permanently losing or adversely affecting any geothermal systems or features in Rotorua and/or connected geothermal areas within the Taupo Volcanic Zone.
2. Yes, Rotorua and/or connected geothermal areas within the Taupo Volcanic Zone must not be the world leading geothermal test rat.
3. Yes, energy resilience is important for the New Zealand but not at the expense of the environment. The Crown must ensure the environment is given priority and is not changed or negatively affected in any way.
4. Yes, the strategy to strengthen regional economies and Te Ōhanga Māori is suitable but please consider using the recent Rotorua Geothermal System Management Plan as a model for co-governance of geothermal management in New Zealand.

2. Do the five overarching action plan goals capture the areas that are most important for achieving the vision, strategic outcomes and energy goal?

1. No, the Crown's proposed strategic outcomes and energy goals themselves are questionable.
2. No, the regulatory system settings (Resource Management Act 1991) are already fit for purpose. The Crown appear to be changing the existing provisions within the Resource Management Act 1991 to capture their own goals and fit their own purpose.
3. No, advancing or doubling the uptake of geothermal without specifically knowing or fully understanding the implications of the uptake on existing geothermal systems that could permanently damage, change, or negatively affect existing geothermal systems is not a sound vision, outcome, or goal.
4. No, enabling place-based geothermal clusters may help towards achieving the Crown action plan goals but enabling place-based geothermal clusters without specifically knowing or fully understanding the implications on existing geothermal systems that could permanently damage, change, or negatively affect existing geothermal systems is not a sound vision, outcome, or goal.
5. No, driving supercritical geothermal technology without specifically knowing or fully understanding the implications on existing geothermal systems that could permanently damage, change, or negatively affect existing geothermal systems is not a sound vision, outcome, or goal.

3. Does the proposed action plan correctly capture the necessary government interventions and priorities?

No, at present the government regulatory system settings prioritize the environment but the Crown planned Resource Management Act 1991 reforms appear to be enabling the Crown to make it easier for themselves to uptake from the Tangata Whenua owned geothermal resources in New Zealand with little or no regard for the environment.

No, while the proposed action plan does capture Crown interventions and priorities, their priorities appear to be power generation for economic development and growth, with little or no regard for the environment.

4. Is the **role for the sector** clear? How can the wider geothermal sector play a role (e.g. are there specific actions that the sector could own)?

The only thing that is clear is that Tangata Whenua owns the geothermal resources in New Zealand and it must remain that way in accordance with the Treaty of Waitangi.

No, the role of the geothermal sector nor the geothermal sector itself, is not clear.

Who is the geothermal sector?

The “geothermal sector” and the Crown must compile a specific action plan to provide sound scientific evidence that their plan to double the geothermal energy by 2040 will not permanently damage, change, or negatively affect existing geothermal systems and features nor the environment.

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?

No, the Crown has not allowed Iwi within the Taupo Volcanic Zone time to gather and meet at a Hui a Iwi to understand and decide what their aspirations are, then the government can properly consider a way forward to meet the aspirations of Tangata Whenua.

The government must extend the submission deadlines to allow deeper Iwi/Hapu engagement and to hold regional meetings with all communities including Tangata Whenua within the Taupo Volcanic Zone.

6. Are there **opportunities** for our geothermal sector that we haven’t considered?

Yes, the Crown should partner with Tangata Whenua to co-govern geothermal in New Zealand in accordance with the Treaty of Waitangi.

Yes, using the current Rotorua Geothermal System Management Plan as a model for future geothermal management in New Zealand.

7. Are there **challenges** for our geothermal sector that we haven't considered?

Yes, the risk of inducing seismic or geothermal events such as earthquakes, hydrothermal eruptions, or geothermal/geotechnical collapse.

Yes, what exit plan does the government have if doubling the geothermal take does cause negative effects on shallow geothermal aquifers and other geothermal taonga in Rotorua and others within the Taupo Volcanic Zone.

Yes, the Crown should take this opportunity to further consider other more environmentally friendly energy sources to increase power generation in New Zealand.

8. Are there **any other things** that the strategy should include or exclude?

Yes, the strategy must include comprehensive monitoring of existing geothermal systems and features.

Yes, the potential negative effects on shallow geothermal aquifers and other geothermal systems and features in Rotorua and other areas within the Taupo Volcanic Zone.

Yes, what plan does the Crown have if doubling geothermal energy use by 2040 causes negative effects on shallow geothermal aquifers and other geothermal systems and features in Rotorua and other areas within the Taupo Volcanic Zone?

Yes, the strategy must include an exit plan if existing geothermal systems are negatively affected by the Crown's plan of doubling the geothermal uptake by 2040.

Thank you

Thanks for your feedback, we really appreciate your insight. It helps us establish a long-term strategic approach to unlock the potential of our geothermal resources in a sustainable manner.

To help us continue to develop a geothermal strategy for New Zealand, we would appreciate any additional suggestions or comments you may have.

Please leave your feedback here:

Yes, adopt the Mataranga Māori Model and co-governance with Tangata Whenua to manage geothermal in New Zealand.

Using the current Rotorua Geothermal System Management Plan as a model for future geothermal management in New Zealand.