

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: Dr Charlotte Severne, Māori Trustee

Email address: resource.management@tetumupaeroa.co.nz

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:

Te Tumu Paeroa – Office of the Māori Trustee

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:

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.

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?

See attached submission.

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

See attached submission.

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

See attached submission.

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)?

See attached submission.

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?

See attached submission.

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

See attached submission.

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

See attached submission.

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

See attached submission.

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:

See attached submission.

11 September 2025

Ministry of Business, Innovation & Employment
15 Stout St, Wellington 6011
resourcesfeedback@mbie.govt.nz

Tēnā koe

From the Ground Up: A draft Geothermal Strategy for New Zealand

1. The Māori Trustee thanks the Ministry of Business, Innovation & Employment (**MBIE**) for the opportunity to make a submission on From the Ground Up: A draft Geothermal Strategy for New Zealand (the **Strategy**).

Background

2. The Māori Trustee administers, as trustee or agent, around 78,000 hectares of Māori freehold land on behalf of approximately 100,000 individual Māori landowners. Te Tumu Paeroa is the organisation that supports the Māori Trustee to carry out her functions, roles and responsibilities. Detailed information regarding the Māori Trustee and Te Tumu Paeroa can be found on Te Tumu Paeroa's website, www.tetumupaeroa.co.nz.
3. The views expressed in this submission represent the Māori Trustee's position as the single largest trustee and agent of Māori freehold land. However, given the sheer scale and varied nature of the land assets within the Māori Trustee's portfolio, the Māori Trustee's views may not always be shared by all owners of the whenua she administers.
4. The Māori Trustee makes her submissions as follows:

Submission Points

A long utilised taonga

5. The Māori Trustee notes that, while the Strategy refers to geothermal as a taonga, it does not include a te Ao Māori perspective on geothermal energy, or Māori relationships with geothermal resources. Because geothermal resources are a significant taonga to Māori, the Māori Trustee **recommends** the Strategy describe and acknowledge a mātauranga Māori¹ view of geothermal

¹ "Mātauranga is a complete indigenous scientific knowledge system that is drawn from the relationship Māori have with all natural environments." Department of Conservation (**DOC**). Te Mana o Te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020, p 33.



energy, as understood by iwi in regions with geothermal resources, including the values iwi hold regarding these taonga².

Role of local government

6. The Māori Trustee notes that the Strategy is silent on local government's role in future geothermal development. However, regional and district councils control resource consenting and allocation, including through district and regional plans and policy statements. The Māori Trustee proposes Councils' roles in implementing and supporting the Strategy be clarified in the Strategy.

Principles of kaitiakitanga

7. The Māori Trustee notes that the Strategy refers to the 'principles of kaitiakitanga'. The Māori Trustee prefers the definition of kaitiakitanga in the Resource Management Act 1991 (**RMA**), as it provides greater clarity.

Question 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?

8. As a general comment, the Māori Trustee is pleased that the Strategy discusses protecting geothermal resources, and considering the needs and interests of future generations. She supports the vision statement³ (the **Strategic Vision**) of sustainable geothermal development. However, she notes that these aspirations are not expressly voiced in the Strategic Outcomes.

Strategic Outcome 2 – Sustainability

9. To ensure greater consistency with the Strategic Vision, she **recommends** that the phrase “to accelerate energy resilience through the development of increased electricity generation and harnessing geothermal heat” in **Strategic Outcome 2** is amended to “to accelerate energy resilience through *increased sustainable development of* electricity generation and harnessing geothermal heat”.

Strategic Outcome 3 – Tāngata Whenua

10. The Māori Trustee supports Strategic Outcome 3's intent to strengthen te Ōhanga Māori by advancing geothermal development in collaboration with tāngata whenua. She is pleased that the Strategy recognises the importance of partnering with tāngata whenua as “an increasingly integral component of geothermal development”, given that Māori have acknowledged rights and interests in geothermal resources.

² Detail of these values and narratives is included in Council and Iwi Environmental Management Plans, in the work of Māori environmental and engineering academics and can be built on by consulting iwi.

³ MBIE. From the Ground Up: A draft Geothermal Strategy for New Zealand (2025), p 4.



-
11. Furthermore, many high and low temperature geothermal resources are found on Māori freehold land, and development may have highly-localised and long-term effects at place⁴, including potential reverse sensitivity effects.
 12. However, she notes there is a risk that the term tāngata whenua in the Strategy, particularly in the Strategic Outcomes and draft Action Plan, potentially may not recognise the rights and interests of Māori freehold landowners in geothermal resources if ‘tangata whenua’ is defined as under the RMA.
 13. The RMA definition of tangata whenua recognises iwi and hapū who hold mana whenua in a particular area⁵, but does not provide for the rights and responsibilities that may be exercised by Māori landowners over Māori freehold land.
 14. In their October 2023 report for GNS⁶, Castalia Limited expressly recognised the significance of the landholdings of iwi and hapū entities and trusts (emphasis added) throughout the Taupō Volcanic Zone (TVZ), and the need to account for agreements with relevant landowners in developing any supercritical geothermal projects.
 15. The Māori Trustee therefore **recommends** that the phrase “by advancing geothermal development in collaboration with tāngata whenua” in **Strategic Outcome 3** is amended to: “by advancing *sustainable* geothermal development in collaboration with tāngata whenua, *including Māori freehold landowners*”.

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

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

16. The Māori Trustee supports this goal because current restrictions, arising from commercial confidentiality, impact our overall knowledge of geothermal systems. This lack of information then impacts the geothermal sector, iwi, hapū and Māori landowners, and wider communities.
17. She considers that this goal enables more efficient sustainable management of geothermal resources and will better empower landowners to understand the possibilities of, and potential impacts to, their whenua. Additionally, it will enable testing and modelling of various scenarios.

Action Plan Goal 2: Ensuring regulatory settings are fit for purpose

18. The current regulatory settings are cautious toward development, as they reflect early historical development of geothermal systems that saw rapid deterioration of surface manifestations and reservoir integrity. Science and monitoring techniques have improved significantly since the 1950s, which mean that matching development options with reservoir condition is advanced, and is advancing quickly. When coupled with improved access to data and the potential of supercritical, we have the opportunity to think differently.

⁴ Historic examples of such impact are associated with the development of the Wairakei geothermal power plant and the Tasman Pulp and Paper Mill. N Taute & Ors, “Māori values in geothermal management and development”. *AlterNative* (2022), vol 18(4), p 522.

⁵ Resource Management Act 1991, section 2.

⁶ Castalia Limited. “Supercritical Geothermal in New Zealand: Economic opportunity in renewable electricity generation and for off-grid energy” (October 2023), p 21.



19. However, while the Māori Trustee recognises the importance of regulatory settings that enable sustainable geothermal development, she would not support any regulatory amendments which diminish environmental protections and limits.

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

20. The Māori Trustee supports the intent of this goal, but considers that it should more specifically focus on Māori landowners, iwi and hapū. As noted above, many geothermal resources are on Māori freehold land, yet, Māori engagement with geothermal technology can be extremely limited. That lack of engagement should be accounted for through this goal. Additionally, the achievement of this goal will require the allocation of Government funding.

Action Plan Goal 4: Enabling place-based geothermal clusters

21. The Māori Trustee supports the intent of this goal, as there can be a disconnect between the geothermal sector and communities where geothermal resources are located, particularly Māori communities who can have strong whakapapa and kaitiaki relationships and responsibilities for geothermal taonga. This disconnect can then result in differing perspectives and priorities on geothermal management and development, which can often have long-lasting adverse effects on Māori communities⁷.

Action Plan Goal 5: Driving science, research and innovation, including supercritical geothermal technology

22. The Māori Trustee considers that this goal should emphasise genuine collaboration and relationships between the sector, academia, central and local government and Māori communities to advance and support supercritical outcomes.

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

23. Further to her response to question 2, the Māori Trustee makes the following recommendations and comments on the Draft Action Plan:

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

24. The Māori Trustee **recommends** that an action is inserted into the Draft Action Plan that relevant government Ministries and agencies (including Te Puni Kōkiri, Ministry for Primary Industries, and Ministry for the Environment) will collaborate on data collection and publication to support access to information for communities and landowners.

Action Plan Goal 2: Ensuring regulatory settings are fit for purpose

25. The Māori Trustee would not support changes to environmental and planning legislation, policy and regulation that:

- a. Allows for an “operational need” test to justify geothermal development that would otherwise undermine environmental management and protections, particularly of freshwater resources, biodiversity, and management of natural hazards.

⁷ E. Conroy and Te Ahi Kaa Roa for the Bay of Plenty Regional Council. “Ngā Wai Ariki o Rotorua: He Kohikohinga. Hau Kāinga Perspectives on the Health and Wellbeing of Geothermal Taonga within Rotorua” (2022).



-
- b. Permits water takes for geothermal development without wider reform of the water allocation system in Aotearoa New Zealand, as some geothermal operations can require significant quantities of water and significantly culturally and environmentally impact freshwater quality and quantity.

26. She **recommends** that:

- a. Any regulatory or policy changes to support sustainable geothermal development must also expressly include requirements to monitor ongoing environmental and cultural impacts of geothermal energy generation. Such monitoring must be informed by robust scientific practice, iwi and hapū mātauranga and engagement with Māori freehold landowners where applicable.

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

27. The Māori Trustee **recommends** that Horizon 1 proposed actions also include:

- a. Development of a geoheat information package for Māori landowners as a group with rights and interests in geothermal resources; and
- b. Funded wānanga and guidance documents for iwi, hapū and Māori landowners in the TVZ to support the action plan goal.

Action Plan Goal 5: Driving science, research and innovation, including supercritical geothermal technology

28. The Māori Trustee **recommends** that Horizon 1 proposed actions also include:

- a. Establishes, in connection with the regional Centre of Geothermal Excellence, a Supercritical Global Research Alliance (similar to the Global Research Alliance on Agricultural Greenhouse Gases) to advance supercritical outcomes by facilitating international collaboration and connectivity between geothermal scientific and technical experts, governments, indigenous communities, landowners (including Māori freehold landowners) and the private sector; and
- b. That the Research Alliance also establish an indigenous working group to build on the work of the Indigenous Geothermal Symposium 2024⁸ and facilitate the continued growth and development of indigenous research in supercritical geothermal.

Question 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?

29. The Māori Trustee is glad to see that the aspirations of tāngata whenua have been considered by the draft Strategy, however, she considers the draft Strategy should go further to meaningfully and effectively enable an innovative, resilient and sustainable geothermal future for Aotearoa New Zealand.

30. She reiterates her recommendations, above, on the need to expressly identify the rights and interests of Māori freehold landowners as players in geothermal development, alongside iwi and hapū.

⁸ [Aotearoa representatives attend first indigenous geothermal symposium](#)



31. Further, specific resourcing is required to support tāngata whenua and Māori freehold landowners to participate in geothermal development, including through targeted wānanga and guidance documents.

Conclusion

32. The Māori Trustee thanks MBIE for the opportunity to submit. She would welcome the opportunity to discuss her submissions further with staff, and to continue to participate in the development of the Strategy.

33. Please feel free to contact [Privacy of natural persons] at Te Tumu Paeroa if you have any questions regarding the Māori Trustee's submissions. [Privacy of natural persons] can be contacted on [Privacy of natural persons] or by email at resource.management@tetumupaeroa.co.nz.

Ngā manaakitanga,

[Privacy of natural persons]

Dr Charlotte Severne

Māori Trustee
