



TE TŌPUNI NGĀRAHU TRUST

Te Tōpuni Ngārahu Trust

6 October 2025

Taranaki VTM Fast-track Application
Environmental Protection Authority
Private Bag 63002
Waterloo Quay
Wellington 6140
Via email substantive@fasttrack.govt.nz

Tēnā koutou e te Poari Matatau,

To the Expert Panel, we extend our greetings.

Your Comment on the Taranaki VTM Project

Please include all the contact details listed below with your comments.

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
Organisation name (if relevant)	Te Tōpuni Ngārahu Trust
First name	
Last name	
Postal address	
Phone number	
Email (<i>a valid email address enables us to communicate efficiently with you</i>)	

2. We will email you draft conditions of consent for your comment	
☒ I can receive emails and my email address is correct	☐ I cannot receive emails and my postal address is correct

3. Please select the effects (positive or negative) that your comments address:	
☒ Economic Effects	☒ Sedimentation and Optical Water Quality Effects
☒ Effects on Coastal Processes	☒ Benthic Ecology and Primary Productivity Effects

☐	Fished Species	☐	Seabirds
☒	Marine Mammals	☐	Noise Effects
☐	Human Health Effects of the Marine Discharge Activities	☐	Visual, Seascape and Natural Character Effects
☐	Air Quality Effects	☒	Effects on Existing Interests
☒	Other Considerations (please specify): Climate Change Effects		

Te Tōpuni Ngārahu Trust has been invited to comment on the application at the Expert Panel's discretion under section 53(3) of the Fast-track Approvals Act 2024 (FTAA). The Taranaki VTM Project application is seeking all necessary approvals for activities associated with the extraction of approximately 50 million tonnes of seabed material per year for up to 35 years. The Project is listed in Schedule 2 of the FTAA.

These comments should be read in the knowledge that the FTAA was strongly opposed by a majority of iwi and hapū throughout the country as well as environmental non-governmental organisations, civic rights advocates and the general public. Opposition centred on the conflation of infrastructure and development with extractive activities which degrade or destroy the environment. This distinction continues to be a vague and contentious issue. We support evidence-based infrastructure and development which is well-planned, contributes to the well-being of communities and recognises the limits of the environment. We do not support extractive or destructive activities based on substandard environmental evaluation or economic cost-benefit analysis which is unable to withstand rigorous scrutiny.

We acknowledge the task before the Expert Panel is formidable and trust that its decision will be based on quality information and the appropriate level of due diligence.

Te Tōpuni Ngārahu Trust (Ngā Iwi o Taranaki Collective) provides the following comments on the Taranaki VTM Project [FTAA-2504-1048]. We request that the email signature or any personal details contained in this document are redacted should these comments be published on any website or if a request for information is made under the Official Information Act 1982.

The comments cover:

- i. who we are;
- ii. our position;
- iii. the relief sought;
- iv. the reasons for seeking that relief.

We wish to be clear that these comments are made in support of the three Aotea Waka Iwi (Ngāti Ruanui, Ngāa Rauru, and Ngāruahine) and their long-standing opposition to the project. Where there is a discrepancy between our comments and theirs, we unreservedly defer to their position as mana moana in their respective rohe.

We strongly recommend that the Expert Panel declines this application. In the event the Expert Panel determines a hearing shall be held, we wish to be heard at that hearing.

Introduction

1. Te Tōpuni Ngārahu Trust was established by the Te Tōpuni Ngārahu Trust Deed dated 1 September 2023 and confirmed by Te Ture Whakatupua mō Te Kāhui Tupua 2025/Taranaki Maunga Collective Redress Act 2025¹. The Trust's role is to be the collective governance entity for Ngā Iwi o Taranaki for the purposes of He Kawa Tupua.
2. Each of the eight Iwi have now completed Treaty of Waitangi settlement claims and established governance and operations bodies as post settlement governance entities (PSGE's). Those eight Iwi are:
 - a. Ngaa Rauru Kiitahi;
 - b. Ngāruahine;
 - c. Ngāti Maru Wharanui.
 - d. Ngāti Mutunga ki Taranaki;
 - e. Ngāt Ruanui;
 - f. Ngāti Tama ki Taranaki;
 - g. Taranaki Iwi; and
 - h. Te Ātiawa.
3. It is notable that in all these Treaty settlements the Crown acknowledged that the lands and other resources confiscated from these iwi have made a significant contribution to the wealth and development of New Zealand.
4. These comments do not usurp or reduce the mana motuhake of each Iwi. As such each Iwi shall also provide their own comments on the application as relevant iwi authorities and treaty settlement entities in their own right.

Te Ture Whakatupua mō Te Kāhui Tupua 2025/Taranaki Maunga Collective Redress Act 2025

5. Te Ture Whakatupua mō Te Kāhui Tupua 2025 (Te Ture) is the result of successive generations of Taranaki Māori seeking the return of their ancestral mountains. Negotiations over Taranaki Maunga were deferred until all eight iwi o Taranaki had a Crown recognised mandate to participate. The Crown made a commitment in the individual deeds of settlement for the eight iwi of Taranaki to negotiate collective redress in relation to Taranaki Maunga and Te Papa-Kura-o-Taranaki (formerly Egmont National Park).
6. The resulting deed – Te Ruruku Pūtakerongo – centres on the establishment of **He Kawa Tupua** – a framework to be given effect to by the redress arrangements. The purpose of Te Ture is amongst other things, to give effect to He Kawa Tupua, comprising² –
 - i. Te Mana o Ngā Maunga, for the purpose of recognising, promoting, and protecting the health and well-being of Te Kāhui Tupua and its status; and
 - ii. Te Mana o Te Kāhui, for the purposes of recognising and providing for the mana and relationship of Ngā Iwi o Taranaki with Te Kāhui Tupua
7. Te Mana o Ngā Maunga is primarily centred on the legal recognition of the legal personality of Te Kāhui Tupua, which comprises Taranaki and other Tūpuna Maunga, incorporating all their physical and metaphysical elements, as a living and indivisible whole.
8. Te Mana o Te Kāhui is primarily directed towards Ngā Iwi o Taranaki and the recognition and further reconnection of the relationship between these iwi and their Tūpuna Maunga.
9. He Kawa Tupua also includes:
 - Te Kāhui Tupua as a legal personality.

- Ngā Pou Whakatupua.
 - The effect of Te Kāhui Tupua status and Ngā Pou Whakatupua.
 - Te Tōpuni Kōkōrangī.
 - The repeal of the Mount Egmont Vesting Act 1978.
 - Te Tōpuni Ngārahu.
 - Official geographical name changes.
 - The vesting of land and certain minerals and industrial rocks in Te Kāhui Tupua.
 - He Kawa Ora.
 - Other matters contained in Te Ruruku Pūtakerongo.
10. Te Kāhui Tupua is a living and indivisible whole comprising Taranaki Maunga and other tūpuna maunga, including Pouākai and Kaitake, from their peaks to, and including, all the surrounding lands, and incorporating all their physical and metaphysical elements.

Ngā Pou Whakatupua: Maunga values

11. Ngā Pou Whakatupua comprises the following intrinsic values that represent the essence of Te Kāhui Tupua and are intended to reflect the cultural, spiritual, ancestral, and historical relationship between Ngā Iwi o Taranaki and Te Kāhui Tupua:
- a. Te Kāhui Tupua is a living and indivisible whole incorporating all of its physical and metaphysical elements.
 - b. Te Kāhui Tupua represents and upholds the ancestral, historical, cultural, and spiritual relationship between Ngā Iwi o Taranaki and their tūpuna maunga.
 - c. Te Kāhui Tupua and its health and well-being are fundamental to the identity, tikanga, reo, and health and well-being of Ngā Iwi o Taranaki.
 - d. Te Kāhui Tupua is a source of spiritual, cultural, and physical well-being of:
 - i. the lands, waters, flora, fauna, and other natural resource of Taranaki; and
 - ii. the people of Taranaki.
 - e. Ngā Iwi o Taranaki, the Crown, and all of the communities of Taranaki have an intergenerational responsibility actively to protect the health and well-being of Te Kāhui Tupua.

Te Tōpuni Kōkōrangī

12. Te Tōpuni Kōkōrangī is a statutory body and the human face and voice of Te Kāhui Tupua. It consists of 8 members:
- 4 members appointed by the trustees of Te Tōpuni Ngārahu; and
 - 4 members appointed by the Minister for Conservation.
13. The functions of Te Tōpuni Kōkōrangī include:
- to act and speak for and on behalf of, and in the name of, Te Kāhui Tupua;
 - to uphold and promote –
 - Te Kāhui Tupua status and Ngā Pou Whakatupua; and
 - the health, well-being, and interests of Te Kāhui Tupua; and
 - to form relationships with the iwi and hapū of Ngā Iwi o Taranaki with interests in Te Papa-Kura-o-Taranaki.
14. The comments of Te Tōpuni Ngārahu are related to the impacts of the proposed activity on the relationship of Ngā Iwi o Taranaki to Te Kāhui Tupua. Any comment on the impact of the proposed activity on Te Kāhui Tupua itself is the domain of Te Tōpuni Kōkōrangī.

Te Tōpuni Ngārahu – Te Mana o Te Kāhui

15. Under section 53(1) of Te Ture Whakatupua mō Te Kāhui Tupua 2025/Taranaki Maunga Collective Redress Act 2025, the trustees of Te Tōpuni Ngārahu must be treated as –
- a public body for the purposes of the Local Government Act 2002; and
 - an iwi authority and a public authority for the purposes of the Resource Management Act 1991.
16. Under section 53(2) of the Act, Te Tōpuni Kōkōurangi and the trustees of Te Tōpuni Ngārahu are, for the purpose of a matter relating to or affecting Te Kāhui Tupua under any legislation, –
- recognised as having an interest in Te Kāhui Tupua greater than, and separate from, any interest in common with the public generally; and
 - entitled to lodge a submission relating to that matter if there is a process for lodging submissions in relation to that matter; and
 - entitled to be heard on that matter if a hearing, proceeding, or inquiry is held in relation to that matter.

Te Iho Tāngaengae

16. Te Iho Tāngaengae is a statement by Ngā Iwi o Taranaki of their cultural, spiritual, historical, and traditional relationship with their tupuna maunga and Te Kāhui Tupua. The statement is acknowledged by the Crown and provided for by section 3 of Te Ture Whakatupua mō Te Kāhui Tupua 2025 legislation.

The statement includes:

He pou whakaruru: Guardian

18. The maunga are pou that form a connection between the physical and the social elements of our lived experience. For Iwi of Taranaki, they have been ever present and remain personified ancestors, a site of shared history, a physical resource, and the citadel of a unique ecosystem. Wider Taranaki society continues to look upon these maunga as key reference points for the region, shaping an immediate sense of place and social association with mutual identity. Their presence pervades our scenery, projecting mystery, adventure, and beauty, capturing our attention and our imagination in how humanity can be closely bound to the landscape. The maunga are pou that transcend our perception of time, location, culture, and spirit. They help configure how whakapapa, environment, the past and future are understood, engaged with, and transmitted to future generations. This is a framework of tangible and intangible resources available to be accessed and applied in our daily lives, and open to being interpreted by various social groupings, Māori and non-Māori, in terms of spiritual, cultural, and ethical values.

He pou taiora: Physical dimension

19. The maunga are the essence of this region having shaped the physical landscape with volcanic activity, inclining slopes, expansive plains and rocky shores. They have shaped the very character of weather, wind, rainfall and climate. They have been the source of unceasing artesian waters, mineral deposits and are a rich store of high altitude biodiversity. These maunga are not simply part of the Taranaki environment they are its synthesis.

He pou kura, he pou wānanga, he pou korero: Social dimension

19. The maunga are the essence of this region having shaped the human landscape with unfaltering springs, fertile lands and an extensive shoreline. They have shaped the very character of geographic reference points, of settlement patterns and boundaries, and have differentiated schools of knowledge of iwi. They have been the source of language, culture and identity. These maunga are not simply landmarks they are the embodiment of whakapapa, the interment of tūpuna incorporated within iwi whakapapa with names, history and sacred sites.

Effects on existing interests

Fast-track Approvals Act 2024

21. The development, introduction and passing of the Fast-track Approvals Act (FTAA) has contributed to the deteriorating Crown-Māori relationship. Along with other PSGE's, Te Tōpuni Ngārahu opposed this Act and its blatant bypassing of the resource management system which has evolved along with the Treaty settlement's process. The FTAA is deliberately framed to overlook the jurisprudence and legal precedent which has developed over the last 35 years.
22. While we acknowledge the need to streamline consenting processes, we do not agree that this can only be achieved by ignoring Iwi and hapū rights and interests. Central to those rights and interests are the principles of te Tiriti o Waitangi/the Treaty of Waitangi. The principles have been developed beside Treaty settlements to prevent contemporary breaches of the guarantees of Article Two of te Tiriti.
23. The creation of this Act to bypass access to natural justice such as the Environment Court, is a direct assault on the principles of te Tiriti and enables a separate pro-development agenda outside of the significant environmental case law established under the RMA.
24. The Fasttrack Act conflates sustainable management and integrated development with damaging, extractive activities under the banner of nationally or regionally significant 'development'. We note that this project, which has had its previous resource consents quashed by both the High Court and Supreme Court, is now attempting to progress through the Fast-track approvals process³.
25. Opposition to the project from the Aotea Waka Iwi is well-documented and understood. We dispute the applicants claims that Iwi must participate in engagement regardless of the quality of their application and that engagement is somehow a requirement of tikanga.
26. As mana moana and kaitiaki of the project area, it is appropriate that these Iwi determine when and where engagement occurs, including whether engagement occurs at all. It is they who determine how tikanga is to be applied in the knowledge that participating in the token engagement proposed by the applicant is likely to be misconstrued as their consent by decision-makers.
27. Te Tōpuni Ngārahu Trust reaffirms its support of Te Rūnanga o Ngāti Ruanui, Te Kaahui o Rauru and Te Korowai o Ngāruahine in their opposition to the proposed project as first communicated by the collective PSGE's of the Taranaki region in May this year⁴.
28. We also feel it important to identify the potential impacts of the proposed project on the temporary fisheries closure in place for Western Taranaki. A two-year Section 186A closure has been renewed by ngā hapū o Taranaki Iwi with the support of Te Kāhui o Taranaki Iwi (Te Kāhui)⁵. This action supports a rāhui placed on the area by Taranaki Iwi Kaumatua in January 2022⁶.
29. Hapū and Iwi requested the closure to:
 - allow more time for population recovery of taonga species;
 - collect data over a sufficient time scale; and
 - to establish longer-term protection strategies.

30. Ngā hapū and Te Kāhui are concerned that the risk this project would pose to their data collection is significant given the now 10-year-old reports the applicant has provided on sediment risk. This uncertainty affects the ability of iwi and hapū to undertake projects that provide for the species population recovery that the rāhui and section 186A actions are predicated on.

Other persons invited to comment

31. Under section 53(3) of the FTAA, the panel may invite comments from any other person the panel considers appropriate. Indeed, Te Tōpuni has been considered one of these such persons. We acknowledge the Expert Panel's use of this section to invite comments from a wide range of groups, including marae, hapū, environmental NGO's, offshore wind developers, and fishing interests.
32. These inclusions have gone some way to alleviating concerns we had held about wider sections of the community being unable have their voice included in the conversation. However, we note that local communities have still not had the opportunity to be heard in the fast-track process. We emphasise that while any fast-track project may have significant regional or national benefits, any negative adverse impacts will be felt locally – not at a regional or national level.

Climate Change Effects

33. Marine sediments play a vital role in regulating climate change by accumulating and burying carbon on timescales of thousands to millions of years and are one of the largest repositories of organic carbon on earth⁷. Advisory opinion of the International Tribunal on the Law of the Sea has found that Aotearoa New Zealand has obligations under international law to:
- reduce the impacts of climate change on marine areas;
 - apply an ecosystem approach to marine law and policy; and
 - reduce pollution and support the restoration of the ocean.
34. The ability of marine sediments to regulate climate on shorter timescales is less certain. Anthropogenic activities such as dredging and anchoring, seabed mining, and bottom trawling have the potential to release sedimentary organic carbon back into overlying seawater⁸. There is a risk that this carbon is remineralised into CO₂ and consequently offsets the oceans absorption efficiency for taking up atmospheric CO₂.
35. A landmark decision by the International Court of Justice (ICJ), the United Nations judicial body and highest court, outlines that countries have a duty to limit environmental harm⁹. Judge Iwasawa Yuji, the President of the ICJ, has stated that if countries do not implement ambitious plans to tackle the climate crisis and the nations' emissions, then this would constitute a breach of their Paris Agreement promises. Countries not part of the Paris Agreement would still be obligated to protect the climate as a matter of human rights law and customary international law.

Marine Mammals

36. We find that the 2015 Cetacean Monitoring Report the applicant has submitted provides little useful information. The deficiencies of the Martin Cawthorn Associates Ltd report include:
- small transect area;
 - visual observations from a Cessna 207 at 500 feet;
 - short discussion using several assumptions based on cetacean habitat;
 - the data collected was from 2011 to 2013.

37. Further insufficient information was contained in the 2015 NIWA report provided by the applicant on Zooplankton and the processes supporting the Greater Western Cook Strait which clearly identifies that the limited data available to the authors is from the 1970's and 1980's.
38. Recent research undertaken by Oregon State University indicates that the South Taranaki Bight region is home to a unique, genetically distinct population of Blue Whales. These whales use the area for foraging, nursing, and breeding. The research also identifies that increasing marine heatwaves result in the distribution of krill aggregations further offshore.
39. It would seem appropriate that this relevant and up-to-date information should form part of a comprehensive assessment of cetacean monitoring for the South Taranaki Bight.

Benthic Ecology and Primary Productivity Effects, Effects on Coastal Processes, Sedimentation and Optical Water Quality Effects

40. Among the many, dated reports included in the substantive application, we note the omission of NIWA's *Environmental risk assessment of discharges of sediment during prospecting and exploration for seabed minerals*¹⁰.
41. NIWA was engaged by the Ministry for the Environment to undertake this 2015 assessment of the environmental risk of sediment discharges arising during exploration and prospecting for iron sands on the shelf along the west coast of the North Island, phosphorite nodules on the Chatham Rise, and seafloor massive sulphide (SMS) deposits along the Kermadec volcanic arc.
42. The effects taken into account were clogging of respiratory surfaces and feeding structures of marine organisms, shading of photosynthetic organisms, diminished capacity for vision by predators and prey, known toxic effects, noise, avoidance of the discharge area by mobile species, and smothering of organisms on the seafloor.
43. The ecosystem components evaluated were the benthic invertebrate community in the discharge environment, the demersal (bottom-associated) fish and mobile invertebrate (squid, octopus, scallops, large crabs) community, the air-breathing fauna, comprising marine mammals, seabirds and turtles, sensitive benthic environments, as defined in the Permitted Activities Regulations 2013, and the pelagic community, including phytoplankton, zooplankton, fish, and larger invertebrates.
44. The scale of discharges that could potentially arise from the prospecting and exploration phases of seabed mining ranges from 1 t or less to, in the case of iron sands, close to one million tonnes. To indicate where thresholds may occur, whereby the risk of adverse effects to the environment would be minor or less, we assessed discharges of sediment of 1 t, 10 t, 100 t, 1,000 t, 10,000 t, 100,000 t and 1,000,000 t.
45. The discharge of sediment into surface waters, mid-water or near the seabed (defined as in the bottom 5% of the water column) was also evaluated since this will determine the size of the consequent sediment dispersal plume and the thickness and extent of the material deposited on the seafloor. NIWA also assessed the consequences of the discharge being from a single point at one time or from multiple points over the permit period that sum to the same total discharge under consideration.

46. Using this qualitative approach, NIWA assessment indicates that, at the scale of sampling undertaken to-date by mining companies prospecting and exploring for seabed minerals, the consequences are likely to be negligible or minor. However, NIWA also concluded that discharges of sediment during exploration and prospecting for seabed minerals can reach major or severe levels of consequence for the most sensitive marine benthic habitats occurring in each of the seabed mineral areas, depending on the size of the discharge, but that catastrophic consequences were never reached over the scales of discharges considered.
47. Severe consequences indicate extensive impacts, with between 60 and 90 percent of a habitat affected within the area being assessed, causing local extinctions of some species if the impact continues, with a major change to habitat and community structure. Recovery is likely to take one or two decades. Severe consequences for sensitive marine environments were reached at discharge scale of 1,000,000 t on the shelf along the west coast of the North Island.
48. We note the applicants own reports have identified that - *“the source of black ironsands along the Whanganui-South Taranaki coast are primarily sourced from andesitic volcanic lahar deposits from Mt Taranaki¹¹. Vanadium-titanomagnetite is a black iron ore that comprises vanadium pentoxide (V_2O_5), titanium oxide (TiO_2), and magnetite (Fe_3O_4). It originates as crystals in volcanic rocks, washed down rivers, largely from Mount Taranaki but also from the Central Plateau of the North Island to Taranaki Bight¹².”*

Economic Effects

49. The FTAA sets out the requirements for economic analysis:
- the criteria for assessing the application. These are that the project would have significant regional or national benefits (section 22(1)(a));
 - the things the Minister may consider in assessing this, including inter alia, whether the project will deliver significant economic benefits (section 22(2)(iv));
 - the reasons for declining approvals, which include adverse impacts (section 85(3)(a)) that are sufficiently significant to be out of proportion to the project's regional or national benefits (section 85(3)(b)).

Lack of cost benefit analysis

50. We suggest that the Taranaki VTM application is lacking robust cost benefit analysis, instead relying on an economic impact assessment (EIA) of the Proposed Project¹³. This NZIER assessment uses a similar methodology to the Delmore Proposed Development using an Input-Output multipliers model to estimate direct and indirect impacts on economic activity, GDP and employment resulting from the Projects operation.
51. NZIER was asked by the applicant to estimate the direct and flow-on economic impacts of the Project on:
- the local economy – South Taranaki and Whanganui;
 - the regional economy – the Taranaki Region (South Taranaki, New Plymouth, and Stratford) and Whanganui; and
 - the New Zealand economy.
52. We note the response of James Stewart, Technical Specialist – Economics, on the now withdrawn Delmore Residential Subdivision Project (Vineway Limited) which was a listed project under Schedule 2 of the FTAA. Mr Stewart was providing a response from the Auckland

Council in light of their earlier recommendation to the Expert Panel that it exercise its discretion under section 67 in order to allow the Council adequate time to respond to outstanding material the applicant had provided¹⁴.

53. The outstanding material included several information gaps that could potentially result in scarce societal resources being use inefficiently. A significant information gap existed in the applicant's use of an economic assessment based the contribution to GDP and employment¹⁵.

54. Mr Stewart commented that he had previously recommended a cost-benefit analysis from a societal perspective which would demonstrate the resource trade-offs arising from the Proposed Development¹⁶. The reasoning behind this recommendation was that –
*“significant regional or national benefits must be seen in the context of the costs borne by society that are likely to arise of the proposed infrastructure or development project because societal resources are limited.
Economic thinking and analysis are required to systematically weigh up the resource trade-offs arising from the Proposed Development and express the inherent uncertainty via sensitivity testing of any welfare impacts to underlying assumptions.”*

55. There are clear differences between the Delmore and Taranaki VTM projects. The criteria for considering fast track applications relating to the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 is set out in clause six of Schedule 10 of the FTAA.

56. It is clear however that determining significant regional or national benefits is not an objective exercise. This is not helped by the lack of a definition in the FTAA which subsequently places a large amount of discretion in the hands of the Minister.

Te Tōpuni Ngārahu position

57. The applicant has set a low bar for the relatively new Fast-track Approvals regime with an unconvincing application. We are confident the Expert Panel will not follow suit and will arrive at a decision that reflects the tremendous degree of uncertainty the applicants evidence has created around the environmental and economic consequences of the project.

58. The relationship of Ngā Iwi o Taranaki with Te Kāhui Tupua is characterised by a history of injustice, redress for that injustice, and setting a path forward where reconciliation can occur under the principles of te Tiriti o Waitangi/the Treaty of Waitangi. The minerals the applicant is focused on extracting have their genesis in Te Kāhui Tupua.

59. That affected Iwi should determine the best use of those minerals is not only appropriate but necessary to maintain Te Mana o Te Kāhui. The injustice of this application is occurring at multiple levels. Ignorance of the treaty relationship and community aspirations, the deprioritisation of environmental protection while simultaneously elevating economic illusions.

60. Ngā Iwi o Taranaki have already contributed disproportionately to the wealth and development of the New Zealand state via the illegal confiscation of their lands and resources. Our iwi have accepted the Crown's apology and it's commitment to work together to build a relationship of mutual trust and co-operation as set out in Treaty settlements.

61. It is therefore disappointing to find ourselves faced with vultures circling resources provided by Te Kāhui Tupua who are aided by Crown enabled legislation. Te Tōpuni Ngārahu Trust remains resolute in its support for Aotearoa

Waka Iwi. The application fails to meet clear iwi and community aspirations, is economically unsound, and has the potential to irreparably damage the environment.

Relief sought

62. Based on this position, Te Tōpuni Ngārahu seeks relief from the Expert Panel to decline the application for the following reasons:
- a. the actual and potential negative adverse effects of the proposed activity have not been adequately assessed by the applicant. This includes impacts on te Tiriti Settlement obligations and existing iwi and hapū uses of the coastal marine area.
 - b. attempts by the applicant to frame iwi and hapū interests merely as fishing rights and the maintenance of mauri is a reductionist approach encouraged by their poor understanding of tikanga and iwi engagement expectations. This misrepresents the rights, interests and relationships of iwi and hapū with their natural environment – including with their tupuna, Te Kāhui Tupua.
 - c. the application has failed to assess all relevant te Tiriti Settlements, including Te Ruruku Pūtakerongo, despite this being entered into in September 2023.
 - d. the potential negative adverse impacts of the proposed project are clearly out of proportion to any significant regional or national benefits posited by the applicant.
 - e. we suggest that based on the information before the Expert Panel, it is not possible to approve the application in a manner that is consistent with the obligations arising from existing te Tiriti Settlements.

Nāku noa, nā

A large black rectangular redaction box covering the signature of the Chairperson.

Chairperson of Te Tōpuni Ngārahu Trust