



Te Rūnanga o NGĀI TAHU

25 August 2025

Expert Panel
Tekapo Power Scheme
C/o Fast-track
WELLINGTON

Tēnā koutou,

Te Rūnanga o Ngāi Tahu comments on Tekapo Power Scheme (FTAA-2503-1035) under the Fast-track Approvals Act 2024 section 53

1. Introduction

- 1.1 Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) welcomes the opportunity to provide comments under section 53 of the Fast-track Approvals Act 2025 on the application made by Genesis Energy Limited (the **Applicant**) for the Tekapo Power Scheme, in Te Manahuna (Mackenzie Basin) (the **Application**).
- 1.2 Consistent with the letter of support dated 27 March 2025 provided by Te Rūnanga and included in the application materials, Te Rūnanga supports Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao in relation to the Application, with their support of the Application to also be regarded as being the position of Te Rūnanga.
- 1.3 Further, Te Rūnanga supports the comments made by Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao. These further comments are intended to provide additional context for the Expert Panel's awareness and consideration.

2. Te Rūnanga o Ngāi Tahu

- 2.1 Te Rūnanga is the statutorily recognised representative tribal body of Ngāi Tahu Whānui, as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**).
- 2.2 Te Rūnanga encompasses five hapū, Kati Kurī, Ngāti Irakehu, Kati Huirapa, Ngāi Te Ruahikihiki, Ngāi Tūāhuriri and 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their respective rohe.
- 2.3 Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā (see **Appendix One**) and has done so since before the Crown began exercising its powers in New Zealand from 1840. The Takiwā covers most of Te Waipounamu and its surrounding islands, constituting over half of New Zealand's landmass, coastlines and waterways. The

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Crown and Parliament recognise and affirm Ngāi Tahu rangatiratanga in our Takiwā through:

- a) Article II of Te Tiriti o Waitangi (**Te Tiriti**);
- b) the 1997 Deed of Settlement between Ngāi Tahu and the Crown; and
- c) the Ngāi Tahu Claims Settlement Act 1998 (**NTCSA**).

2.4 As recorded in the Crown Apology to Ngāi Tahu (see **Appendix Two**), the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that “it recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. Those commitments are fundamental to the fast-track regime.

2.5 Te Rūnanga requests that the Expert Panel accord these comments with the status and weight of the tribal collective of Ngāi Tahu Whānui comprising over 80,000 registered iwi members.

3 Comments

3.1 Our comments on the Application are set out below:

Ngāi Tahu Settlement Statutory Acknowledgement and Nohoanga

- 2.1. The Application is within the Takapō and Lake Pūkaki Statutory Acknowledgement areas. Ngāi Tahu association with Takapō is detailed in schedule 57 and the associate with Lake Pūkaki is detailed in schedule 34 of the NTCSA (refer to **Appendix Three**). These associations include important Ngāi Tahu histories and traditions that reinforce tribal identity and links, including to Aoraki. Schedule 57 records the history of Ngāi Tahu occupation with Takapō and the presence of urupā, resting places of Ngāi Tahu tūpuna, associated with the lake.
- 2.2. Further, schedules 57 and 34 outline that Takapō and Lake Pūkaki are important for mahinga kai. Knowledge of the traditional trails, utilisation of resources associated with the area and the relationship of people with Takapō and Pūkaki, continue to be held by whānau and hapū and remain important today.
- 2.3. While not a comprehensive list, Schedule 97 of the NTCSA lists a number of bird, flora and fish species considered taonga.
- 2.4. The importance of the lakes and wider area for mahinga kai has also been recognised in other settlement provisions, such as through the allocation of land for the Lake Pūkaki, Whakarukumonana/Lake McGregor and Takamoana/Lake Alexandrina Nohoanga Entitlements. Under settlement, Nohoanga Entitlements are to enable Ngāi Tahu Whānui to temporarily occur land (camp) close to water ways, to have access to the surrounding areas for fishing and gathering of natural resources, following in the traditions of Ngāi Tahu Tūpuna.
- 2.5. It is important that the significance of these sites to Ngāi Tahu is recognised and acknowledged by the Export Panel, and reflected in the decision on the Application.

3. Ngāi Tahu Settlement Taonga Species

- 3.1. The special association Ngāi Tahu have with taonga species within the Ngāi Tahu Takiwā has been acknowledged by the Crown in the NTCSA¹, with a list of taonga species provided in Schedule 97 and schedule 98 (refer to **Appendix Four**).
- 3.2. The application identifies a number of species that are listed in schedule 97, for example:
- Kaikī (Black Stilt)
 - Pied shag (Kōau)
 - Pied stilt (Poaka)
 - Grey teal (Tete)
 - Paradise shelduck (Pūtakitaki)
 - Black-backed gull (Karoro)
- 3.3. Those species listed in settlement does not include all species Ngāi Tahu considers taonga. For example, as indicated by the species listed in the Treaty Impact Assessment and the comments by Rūnanga, Tuna is a taonga but is not listed in schedule 97 or 98.
- 3.4. Many species as considered taonga for their mahinga kai value. As indicated in the settlement provisions above, comments by Rūnanga and the Treaty Impact Report, a number of taonga species within the area were utilised for mahinga kai.
- 3.5. It is important that the significance of taonga species to Ngāi Tahu is recognised and acknowledged by the Export Panel, and reflected in the decision on the Application.

4. Decision Sought

- 4.1 Te Rūnanga thanks the Expert Panel for the opportunity to comment on the Application.
- 4.2 Te Rūnanga seek that appropriate consideration is given to the provided comments, including the comments provided on behalf of Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao.

Nāku noa nā,



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¹ Section 288 of the NTCSA. Ngāi Tahu association includes cultural, spiritual, historic, and traditional.

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Appendices:
Appendix One – Map of takiwā of Ngāi Tahu
Appendix Two – Crown Apology to Ngāi Tahu
Appendix Three- Statutory Acknowledgements- Takapō, Lake Pūkaki
Appendix Four – Taonga Species