



Me Karakia Tātou

Takinga te kawa

Ko te kawa tuatahi
Ko te kawa tuarua
Ko te kawa tuatoru
Ko te kawa tuawha

Takinga te kawa

Ko te kawa tuarima
Ko te kawa tuaono
Ko te kawa tuawhitu
Ko te kawa tuawaru
Ko te kawa tuaiwa

Takinga te kawa

Ko te kawa muwai
Ma maru whakawiwi
Ko te whare ruarangi

E rere taku manu
Taku manu utiuti
Taku manu okaoka
Oka taku manu mamao e tane

E rere ki uta
E rere ki tai
Ki te wai ao
Ki te ao marama
E rongo ma tane whakairihia

Haumi e! Hui e! Taiki e

From: Ōkahu Inuāwai me ētehi atu hapū
To: Panel for the Purpose of the Fast-track Approvals Act 2024
Taranaki VTM Project [FTAA-2504-1048]
Environmental Protection Authority
Sent by email: substantive@fasttrack.govt.nz
Dated: 4 October 2025

Tēnā koe,

These written comments are made pursuant to the letter written by Matua John Hooker seeking recognition of the right of Ōkahu Inuāwai me ētehi atu hapū to submit on a kaupapa which threatens to take place on our rohe.

The Taranaki VTM Project, or TTR, seeks to operate within the moana over which we hold mana moana. Under the tikanga of our hapū, actions do not take place in isolation. The taiao is holistic. The moana is the awa, is the whenua, is the people. A threat to one aspect is a threat to the whole.

We wish to share with the panel the strong assertion that under our tikanga and our insights regarding our region, there is absolutely no benefit posed by the TTR proposal. We have read the application. We know our moana, we know our awa, we know our people. We can tell you very clearly and confidently that there is no evidence of any benefit from the TTR proposal, only risks which cannot be addressed, the risks can only be addressed by stopping the TTR proposal completely in its tracks.

We assert that our position opposing TTR is evidential. This is not opinion evidence or hearsay. We know for a fact that TTR is dangerous and must be stopped. We are offering you this submission as evidence from what we know of our whānau, hapū, iwi, and our region.

These comments are written following several hui of our hapū. Our hapū operates through whakapapa and cycles of hui. Uri of our hapū appoint a Committee of Management who meet every month. Every second month is a hui open to all uri members. The Committee of Management implemented an intergenerational approach to drafting these comments in which a member of our kaumatua worked alongside one of our rangatahi. These comments therefore reflect the whakaaro inherited from our tūpuna for the future of our mokopuna. The two drafters of these comments were:

[REDACTED]

Te Tohu Matauranga Whakapakari Tino Rangatiratanga O Te Kohanga Reo,
Environment Commissioner 2025

[REDACTED] tauira of taiao studies at Victoria University.

Signed:

[REDACTED]

Ko wai mātau

Ko Te Rangatapu te Takutaimoana

Ko Te Rangatapu me Te Kawau nga Tauranga Waka

Ko Waingongoro te Awa

Ko Okahu me Inuawai nga Whenua

Ko Okahu te tangata

The tuturu takiwā of Ōkahu Inuāwai me ētehi atu hapū within which we hold mana motuhake, including shared boundaries with our sister hapū, are as follows:

Timata te rohe o Ōkahu mai te ngutu awa o Waihi (Pukeoha) tai ki Hawaiiki-nui, ki Hawaiiki-roa, ki Hawaiiki-pamaomao. Hoki ki te uru ara te ngutu awa o Inaha (Otāika). Haere ki uta mai te ara o Ahipaipa, tainoa ki Okaiawa (Kākata), tainoa ki Maru, tainoa ki te Ngutu o te Manu, ki uta tonu ki Ruaruru, tainoa ki te tīhī o Taranaki Maunga. Heke iho ki te Rāwhiti, ki Te Tahuna o Tutawa, heke iho mai te awa o Waipuku Pātea, tainoa ki te Pakarutanga o Manganui, whakawhiti mā tongatonga ki te Pakarutanga o Kahouri awa me Pātea awa. Haere mā tongatonga anō ki Maata (ki te Rāwhiti o Arakamu). Haere mā tongatonga ki te awa o Mangapoua, tainoa ki te ara o Turuturu Mōkai, tainoa taua ara ki te ngutu awa o Waihi. Ki te Rāwhiti, ko te whenua o Mangaotuku hoki.

The territory of Ōkahu starts from the mouth of the Waihi River (Pukeoha) upstream to Hawaiiki-nui, Hawaiiki-roa, Hawaiiki-pamaomao. Return to the west via the mouth of the Inaha (Otaika) river. Go inland from Ahipaipa road, go to Okaiawa (Kākata), go to Maru, go to Ngutu o te Manu, go further inland to Ruaruru, go to the tip of Taranaki Maunga. Descend to the East, to Te Tahuna o Tutawa, down the Waipuku Pātea River, then to the Manganui River Break, cross south-west to the Kahouri River Break and Patea River. Go south again to Maata (east of Arakamu). Go south to the Mangapoua river, take the Turuturu Mōkai road, take the same road to the mouth of the Waihi river. To the East there is also the Mangaotuku Block.

Uri of Ōkahu Inuāwai me ētehi atu hapū have whakapapa which directly connects us to all aspects of te taiao within our rohe. For us, the land is our literal ancestor. We regard all manifestations of te taiao with the same sense of aroha and care as one would treat a beloved kaumatua. This whakapapa is the foundation for our mana motuhake within the rohe of our hapū, including with areas where we hold shared interests with our sister hapū and iwi.

Uri of Ōkahu Inuāwai me ētehi atu hapū are the descendants of tūpuna who are among the longest continual tangata whenua in Aotearoa. Archaeological remains found at Te

Rangatapu in Ōhawe include some of the earliest physical remnants of tūpuna maintaining ahi kā. Uri descend from several waka, including the waka Te Rangiūamutu, captained by Tamatea-Rokai which landed at Te Rangatapu located in Ōhawe. The tangata whenua tribes from these times are known as Kahui-maunga, Kahui toka, Kahui-rere, Te Kahui Tuu, Maru-iwi and Te Tini-o-tai-tawaro, Te Kahui-Ruu and Te Kahui Tawake. This demonstrates the depth of mana motuhake within the mana tangata of the people of Ōkahu Inuāwai me ētehi atu hapū, and the powerful opportunity to connect and collaborate with a historic peoples of these lands.

Uri of Ōkahu Inuāwai me ētehi atu hapū are also descendants of the well known waka Aotea Utanganui waka captained by Turi-te-Ariki-nui. During the fourteenth century, Turi, with his wife Rongorongo and their people, travelled to Aotearoa from Rangiātea and many places within our rohe still carry the names gifted by Turi and his people. Several generations after Turi's arrival, his descendant Hinekoropanga became an important kuia for her hapū and iwi, and her pā Okahutiti became a significant stronghold for her people, located in close proximity to her brother Puawhato's pā, an important tūpuna for our sister hapū Kānihi-Umutahi. Puawato's principal Pa was Tauteone with the celebrated Wharenui Te Mata O Rehua.

Kei whea te whakawhanaungatanga

We have never ever had any engagement or consultation with TTR. This is very surprising and hurtful to us. We are easily found. We have several online websites, including our official website for our pā which is very popular and well known for bookings in our region. We have several Facebook groups for our hapū, our taiao roopu, our kaumatua roopu, our pā. We are easy to find. We have been very active in many aspects of the taiao. We have been on TV and in the news many times. We have advocated for the moana for decades and centuries. We have several Waitangi Tribunal reports related to our mahi in the taiao and moana. We were never, ever, approached for kōrero from TTR. This is not tika. We submit this as factual evidence that all our legal rights regarding engagement and consultation, under legislation and case law, none of this was complied with, to this day.

This makes it even more urgent that the panel pause the process until this engagement and consultation is done. It must be done for each hapū. For each pā. For each marae. For each iwi. Inland and at the coast. This is because of the seriousness of this kaupapa and the gravity of the risks of TTR to our taiao, our whakapapa, and our livelihoods. We are in a cost of living crisis. We are kaitiaki. We must protect our moana and all connected to the moana such as the awa. The easiest way to see this connection is through taonga species that live both in the awa and the moana such as pīharau, tuna,

kahawai, inanga. Everyone loves whitebaiting, well, TTR will definitely wipe out all that is left to whitebait. We are telling you this as a fact.

Our tikanga and the lack of engagement means its really really important for the panel to hold a hearing. And a hearing with several stages which can honour the mana of each hapū so the panel can come to be our manuhiri at each of our marae. Within our tikanga, there is a primary emphasis on hui kanohi-ki-te-kanohi. Meeting face to face enables the tikanga of whakawhanaungatanga to build relationships in an enduring manner which reflects the enduring nature of the role of our hapū as mana whenua and the aspirations to continue relationships forwards into the future in the spirit of trust and constructive collaboration.

We are an oral culture. For our people, the prospect of written documents and formal proceedings can invoke painful pasts and present experiences of hostility from the Crown and institutional systems. This is never a good context for witnesses providing evidence, let alone for people of an oral culture and for our kaumatua and kaitiaki. In person hearings within our marae is therefore important for the robust evidential process. We hereby invite the panel to come to us at Aotearoa pā for conducting hearings.

Within our tikanga, there is also a strong emphasis on maintaining high-levels of uri input. It is therefore necessary to include timeframes within the panel's process which reflect our high-participation and highly-democratic method of consensus decision making as a hapū. This reflects our tikanga as a living law, developed through all members of the hapū participating in life together, and also reflects the need for whānau from across our rohe to input on consents as may relate to the part of our rohe for which their whānau and tūpuna have specific connections.

Kei whea te kaitiakitanga

It is impossible to express how important kaitiakitanga is for us as uri of Ōkahu Inuāwai me ētehi atu hapū. We have a Taiao Plan and Climate Strategy. Our Taiao Plan clearly sets out our tūpuna baselines for environmental standards and a mokopuna-based vision for our taiao flourishing thousands of years into the future.

Key aspects of this Taiao Plan include drinkable awa, no more paru of any form anywhere in te taiao, and reforesting the ringplain of Taranaki with native ngahere, including bush corridors along all awa from the Maunga, now recognised with legal personhood under Crown law,¹ through all our awa down to the moana. We also have a Climate Strategy which specifically addresses emissions mitigation and adaptation to

¹ See for example with respect to Maunga Taranaki:
<https://www.legislation.govt.nz/act/public/2025/0001/latest/LMS899476.html>.

the human-induced catastrophic weather crisis which is increasingly becoming unavoidable, and for which we to lead addressing through mauri and mātauranga-based solutions which form part of our tikanga founded upon kaitiakitanga.

The TTR project is not compatible with our Taiao Plan and our Climate Strategy. There are no benefits when our moana and awa will be threatened by sediment plumes, this will kill our taonga species. We are kaitiaki of our taonga species and they are kaitiaki of us as they keep us alive when we are struggling under the cost of living crisis. We don't want these vessels coming into our moana with the risk of bringing pathogens and biohazards into the moana and awa. We know that the mauri from the waters where these boats come from is not the right mauri for our waters. We have seen that this vessel comes from the de Beers company which was established under the time of the apartheid regime in South Africa. We don't want that hara in the mauri of our moana.

We have seen the research on the impacts on seabirds that was looked at by the Supreme Court when they rejected the TTR project. Our pā of our tūpuna near to our pā Aotera was called Ōkahu tītī, after the tītī bird. These sea manu are so important to us that our tūpuna lived under the protection of their name for their kainga. We are working to restore the tītī to our moana and whenua, and we have been working with the Department of Conservation alongside our own mātauranga to encourage the species to increase their nesting sites along our coastline.

We have also seen that the Supreme Court pointed out the shortcomings around the supposed economic aspects of the TTR. Again, we can assert as a matter of evidential fact that this TTR proposal will bring no economic benefits to our whānau, hapū, iwi. We can speak to the evidential aspects that there are no benefits within our region, not even related to financial aspects. We know that the jobs will not be coming to us. Of all the jobs projected, we can see approximately 70 may be within our region but none of those required skill sets will benefit our region. We as hapū and iwi are just as much part of the region and the nation as any other roopu. To decide otherwise would be racist and a violation of the Human Rights Act. Indeed, we are the tangata whenua. We offer these assertions regarding the lack of regional benefit as evidential fact. We know our people, we know our region, we know our nation.

And how can a company that is so much in debt be able to offer any benefit regionally or nationally. We have read their audit of the parent company Manuka Resources. We know that they recently listed in the NZ stock exchange. We have been following their listing on the Australian stock exchange. We saw that they have not been disclosing media announcements related to market sensitive information, such as when one of our rangatahi submitted a case to the Waitangi Tribunal. We are worried that they are seeking to gain a permit from the panel and then sell it to try to recover a profit. There will be no mechanism for accountability in that scenario. We can't see any benefit in risks like this.

We wish to be able to share tikanga with the panel on a deeper level. A non-Māori approach to TTR may begin with directly responding to each proposed activity and suggesting mitigations. An ao Māori approach might instead begin many steps further back to the very beginnings of the universe in order to best appreciate the inherent logic of the natural law underpinning tikanga, and thus, the importance of kaitiakitanga and maintaining the mauri of a healthy environment.

This journey back through space and time may seem highly off the beaten path to non-Māori, and yet is so fundamental for Māori as to be self-evident. However, there are important caveats to note at the outset. There is no singular Māori experience. There is no monopoly on the Māori narrative. There is no absolute approach to tikanga. Instead it is important to operate under tikanga and develop direct relationships with us as mana whenua, recognising our capabilities but also our restrictions regarding time and resourcing. Having said that, there is sufficient clarity around core practices of our kaitiakitanga such that it is possible to ascertain conclusions of value to the resource consent.

Kaitiakitanga is a central organising principle within tikanga and that maintaining mauri within te taiao is essential for safeguarding taonga katoa within ao Māori.² It is well understood how important kaitiakitanga is in ao Māori. This principle has permeated across the motu and forms an important part of Aotearoa's "clean green" international reputation. Ōkahu Inuāwai me ētehi atu hapū are very active in advancing kaitiakitanga through all means possible, including through recent court cases challenging new petroleum permits in our rohe which is currently at the Supreme Court³ and we have submitted requests to open an investigation into climate change at the International Criminal Court.⁴

We know that tikanga is increasingly being upheld in courts as a source of law in Aotearoa which must be respected by all New Zealanders, including the panel deciding this TTR kaupapa. Our hapū has taken the issue of kaitiakitanga to the Waitangi Tribunal many times, including with respect to the Petroleum Reports. The Tribunal found that processes which do not sufficiently recognise the importance of enabling mana

² Jones, C. (2016). *New Treaty, New Tradition: Reconciling New Zealand and Maori Law*. UBC Press, p.71. See also Marsden, M., & Royal, T. A. C. (2003). *The woven universe: Selected writings of Rev. Māori Marsden*. Estate of Rev. Māori Marsden, pp. 67, 69. Selby, R., Moore, P., & Mulholland, M. (2010). *Māori and the environment : kaitiaki*. Huia, p.221. Roberts, M. (1995). Kaitiakitanga: Maori perspectives on conservation. *Pacific Conservation Biology*. 2(7) at 14; Durie, E.T., (2017). *Ngā wai o te Māori: ngā tikanga me ngā ture roia* The waters of the Māori: Māori law and State law. *New Zealand Māori Council*. p.30. McCully, M. & Mutu, M. (2003) *Te Whānau Moana: ngā Kaupapa me ngā Tikanga Customs and Protocols* Reed Books, p.67.

³ <https://climatecasechart.com/non-us-case/students-for-climate-solutions-inc-v-minister-of-energy-and-resources/>

⁴ https://climatecasechart.com/wp-content/uploads/non-us-case-documents/2022/20221208_19343_points-of-claim.pdf

whenua to advance kaitiakitanga constitute breaches of Te Tiriti/the Treaty due to Crown agents acting to “minimise Māori interests” to the extent that “Māori cannot protect their lands, waters, and other taonga, nor exercise their kaitiakitanga.”⁵ The Tribunal emphasised the impacts wherein “Māori cannot exercise kaitiakitanga to protect and conserve for future generations the taonga with which they have been entrusted... the result is the inexorable eroding of the spiritual and cultural relationships that Māori have with their resources, wāhi tapu, and taonga, in breach of the principles of the Treaty.”⁶ The Tribunal found that “the importance and value of Māori advice needs to be recognised and regarded appropriately as a means of enhancing resource management processes rather than being perceived as detracting from them.”⁷

Long after this TTR application is decided, we will always remain as tangata whenua. We will do everything we can to stop the TTR application and any threats to our taiao.

Kei whea tō tātou mokopuna

We believe it is essential that the TTR Fast-track panel carefully consider the long-term impacts of this proposal — particularly on our rangatahi Māori. Mātauranga ā Ōkahu Inuāwai, along with that of other hapū, is deeply rooted in the unique ecologies of our ancestral rohe. As a rangatahi Māori, I hold serious concerns about the potentially irreversible and destructive effects that experimental seabed mining may have on the marine environment and marine species. These impacts directly threaten the tikanga, rights, and existing interests of the Iwi Parties.

Being a kaitiaki is fundamental in te ao Māori; it is a sacred responsibility to care for and serve both the environment and each other. Yet becoming a kaitiaki is not learned through theory alone; it is shaped by lived, intergenerational practice: walking the reefs, harvesting kaimoana, listening to the treasured pūrākau of the moana, and protecting the health of our awa. These are the places where identity, belonging, and responsibility are cultivated.

⁵ https://forms.justice.govt.nz/search/Documents/WT/WT_DOC_68187775/PetroleumReportW.pdf p. xv also found limited capacity of Maori and Crown lack of “assistance” ie resourcing to do so, low engagement. P.147: recommended regional iwi advisory committees for input on petroleum.

⁶ https://forms.justice.govt.nz/search/Documents/WT/WT_DOC_68187775/PetroleumReportW.pdf p.165.

⁷ https://forms.justice.govt.nz/search/Documents/WT/WT_DOC_68187775/PetroleumReportW.pdf p.157.

This seabed mining proposal threatens to sever these cultural and ecological pathways. It disrupts our whakapapa and replaces our vital learning environments with polluted, extractive spaces shaped by colonial dominance. This not only undermines our ability to uphold tikanga, but also erodes our rangatiratanga and compromises our role as kaitiaki for future generations.

Māori don't perceive the moana as a resource to be stripped for short-term gain, but rather a living ancestor that sustains us physically, spiritually, and culturally. If these ecosystems collapse, so too do the relationships and practices that have bound our people to these waters for centuries. The loss is not just environmental; it is genealogical, cultural, and spiritual. It strikes at the heart of who we are.

As our learning pathways are cleaved from existence, I fear that the capacity in which my generation can teach and uphold our mātauranga for our future mokopuna will be greatly diminished. Our tamariki will inherit not the abundance of life we once knew, but degraded environments where tikanga has been silenced by destruction. The intergenerational promise of kaitiakitanga, that we leave our world stronger and more resilient for those who come after us, will be broken.

Therefore, we submit that the TTR project poses no benefits and must be rejected by the panel.

Me Karakia Tātou

Unuhia, unhia

Unuhia te uru tapu nui

Kia wātea, kia māmā te ngakau, te tinana, te wairua

i te ara takatū.

Koia rā e Rongo

Whakariria ake ki runga

Kia wātea, kia wātea,

Āe rā, kua wātea

Hau, Paimārie.