



Te Rūnanga o NGĀI TAHU

26 June 2026

The Expert Panel
Hananui Aquaculture Project
c/o EPA
WELLINGTON

Kia ora Panel

HANANUI AQUACULTURE PROJECT – CONSENT CONDITIONS AND RTIAB

Introduction

Pursuant to section 15 of Te Rūnanga o Ngāi Tahu Act 1996 Te Rūnanga o Ngāi Tahu (**TRONT**) is recognised for all purposes as the representative of Ngāi Tahu Whānui.

The Hananui Aquaculture Project (**HAP**) is a Ngāi Tahu undertaking supported by TRONT and is being advanced through Ngāi Tahu Seafood Resources Limited (**NTS**), a company that TRONT wholly owns and that is responsible for the tribe's commercial fishing assets and business.

NTS has requested TRONT provide this letter to assist the Expert Panel as it considers how to address the request of the Rakiura Tītī Islands Administering Body (**RTIAB**) that the conditions on any approval the Expert Panel may grant for the HAP provide formal recognition of RTIAB and opportunities for RTIAB's involvement in aspects of the environmental management and monitoring of the HAP, should it proceed. We understand RTIAB's particular interest is in addressing any impact the HAP might have on tītī, a taonga species listed in Schedule 97 of the Ngāi Tahu Claims Settlement Act 1998, and a species that is of immense importance to Ngāi Tahu Whānui. TRONT considers protection of the settlement, including impacts on taonga species such as tītī to be an absolute priority for TRONT and a core part of TRONT's role.

RTIAB

RTIAB is an important Ngāi Tahu entity, established by section 336 of the Ngāi Tahu Claims Settlement Act 1998 (**NTCSA**). RTIAB operates as an administering body under the Reserves Act for the purpose of controlling and managing the various islands described in Schedule 106 of the NTCSA. These are islands that were "Crown Tītī Islands" following the deed of cession in 1864 and which were vested in TRONT as part of the Ngāi Tahu settlement as recorded in section 334 the NTCSA.

For the purpose of controlling and managing the islands RTIAB has all the functions and powers of an administering body under the Reserves Act (section 336(7) NTCSA).

RTIAB's activities include those described in Schedules 109 and 110 of the NTCSA. RTIAB's control and management of the islands is subject to, and cannot interfere with, the customary rights of Rakiura Māori¹ to take tītī on a sustainable basis (section 336(3) NTCSA).

¹ Rakiura Māori is defined in section 333 NTCSA as "means any person who is a member of the Ngāi Tahu tribe or Ngāti Mamoe tribe and is a descendant of the original Māori owners of Rakiura/Stewart Island"

Wider Ngāi Tahu Interests and Representation

As noted at the start of this letter, TRONT is for all purposes the recognised representative of Ngāi Tahu Whānui collectively. The Ngāi Tahu takiwā includes all the titi islands.

Ngāi Tahu is organised around 18 Papatipu Rūnanga throughout our takiwā. Our Papatipu Rūnanga are recognised in Te Rūnanga o Ngāi Tahu Act 1996 as “members” of Te Rūnanga o Ngāi Tahu. In this context being a “member” is akin to being a shareholder or owner. Te Kawenata o Ngāi Tahu is an important part of the Ngāi Tahu legal framework and has been signed by all Papatipu Rūnanga. Te Kawenata provides core principles that underpin the TRONT structure. Included in Te Kawenata is:

“The Kaupapa Whakakotahi is that the poupou of the House of Tahu are the Papatipu Rūnanga of our people each with their own mana woven together with the tukutuku of our whakapapa. In them resides the tino rangatiratanga of Ngāi Tahu. Its collective voice is Te Rūnanga o Ngāi Tahu.”

This recognition that the tino rangatiratanga of Ngāi Tahu resides in our Papatipu Rūnanga reflects their fundamental role and importance in the Ngāi Tahu structure.

In Murihiku/Southland the four Papatipu Rūnanga² are collectively called Ngā Rūnanga ki Murihiku.

Ngā Rūnanga ki Murihiku are clear in their expectation that they are the primary Ngāi Tahu group with whom NTS should formally engage in relation to Ngāi Tahu matters concerning the Hananui Aquaculture Project. TRONT supports this approach and note that it reflects a continuation of existing position whereby NTS’s activities in Murihiku are done in consultation with Ngā Rūnanga ki Murihiku.

That is not to say other Ngāi Tahu entities, including RTIAB, that are active in Murihiku are excluded and have no role to play. TRONT expects NTS, and indeed all Ngāi Tahu entities, to maintain good relationships and communication with other relevant tribal entities. In this context TRONT would encourage and expect NTS to continue engagement with RTIAB on matters relating to the operation of the Hananui Aquaculture Project where that might be relevant to RTIAB’s role in controlling and managing the Schedule 106 NTCSA islands.

It is TRONT’s position that the identification of Ngā Rūnanga ki Murihiku as the Ngāi Tahu collective group with which NTS must formally engage in accordance with the proposed consent conditions for the Hananui Aquaculture Project is appropriate. This reflects the way Ngāi Tahu is structured, and the role and mana of Papatipu Rūnanga within that structure.

TRONT considers that does not take away from the importance of other Ngāi Tahu entities that have relevant customary, legal, or other recognised roles and responsibilities, including RTIAB. We would expect those entities will continue to be consulted and provided relevant information within the context of wider tribal relationships, and they will continue to have the ability to engage appropriately with NTS, with Ngā Rūnanga ki Murihiku, and with TRONT as necessary.

TRONT therefore continues to support the conditions of consent as proposed by NTS and does not support extending consent conditions to include formal engagement obligations with RTIAB.

Ngā mihi



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² Te Rūnaka o Awarua, Waihopai Rūnaka, Te Rūnanga o Ōraka-Aparima, Hokonui Rūnaka

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