TE NEHENEHENUI

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Ōparure Quarry South-Western Pit – Fast-track Approvals Act 2024 – Substantive Application by Graymont (NZ) Limited [FTAA-2606-1251]

Thank you for the opportunity to comment on the substantive application by Graymont (NZ) Limited (Graymont) under the Fast-track Approvals Act 2024 (FTAA) for the development, operation and progressive rehabilitation of a new south-western pit at the existing Ōparure Quarry, near Te Kūiti.

Role of Te Nehenehenui

Te Nehenehenui is the post-settlement governance entity under the Maniapoto Claims Settlement Act 2022, which represents and acts on behalf of Maniapoto (inclusive of all within Te Nehenehenui).

The Fast-track Approvals Act 2024 sets out obligations relating to Treaty settlements and recognised customary rights. Section 7(1)(a) requires persons performing or exercising functions, powers and duties under the Act to act in a manner consistent with obligations arising under existing Treaty settlements.

In this regard, Te Nehenehenui is a relevant iwi authority and Treaty settlement entity for the purposes of section 53(2) of the FTAA.

Section 134 of the Maniapoto Claims Settlement Act 2022 articulates the vision, principles and aspirations that guide the interpretation and implementation of statutory redress relating to resource management, particularly Ngā Wai o Maniapoto.

These provisions recognise the importance of an enduring and constructive relationship with the Crown and local authorities, respect for Maniapoto tikanga, and the protection and enhancement of Maniapoto's cultural, spiritual and ancestral relationships with lands, waters, wāhi tapu and taonga.

Of particular relevance to this application are the principles of Te Mana o te Wai, kaitiakitanga, the restoration, protection and enhancement of Ngā Wai o Maniapoto, and the recognition of Maniapoto as rangatira and kaitiaki in resource management and decision-making.

The Expert Panel

Te Nehenehenui acknowledges the members of the Expert Panel and the responsibilities associated with determining this substantive application.

We note that the Minister's referral decision includes specific directions requiring the Expert Panel to have particular regard to Te Ture Whaimana, have regard to the Maniapoto Environmental Management Plan and consider the provisions of the Joint Management Agreement as they apply to the fast-track process.

Te Nehenehenui considers these directions are particularly important given the relationship of the proposed quarrying activities with the underlying karst systems, the Mangawhitikau catchment and the wider Waipā River catchment.

Mana whenua

Te Nehenehenui acknowledges the role of Ōparure Marae as mana whenua and kaitiaki of the area affected by the proposal. We understand that discussions between Graymont and Ōparure Marae have continued. We support constructive engagement between the parties and will continue to defer to mana whenua on matters relating to cultural values, relationships and ongoing responsibilities.

Te Nehenehenui's position on the application

Te Nehenehenui provided submissions on Graymont's resource consent applications to Waikato Regional Council and Waitomo District Council in May 2025. Those submissions were neutral in respect of the proposal and focused on technical matters, including the protection of cave and karst systems, surface and groundwater effects, archaeology, ecology, rehabilitation and environmental monitoring. We also provided comments on the referral application under section 17 of the FTAA on 20 April 2026.

Our section 17 comments reflected our concern that the FTAA process might not provide Ōparure Marae with the same opportunities to express their views as the RMA resource consent process. Accordingly, our approach was to reiterate our technical position and convey Ōparure Marae's opposition to the proposal. This was intended to ensure that mana whenua's views were appropriately recognised and considered. We are pleased that Ōparure Marae have been invited to comment on this application.

Our comments are intended to build upon the matters we have previously raised, rather than revisit issues that have been satisfactorily addressed. In particular, we have considered whether the substantive application and proposed conditions adequately respond to our earlier concerns regarding the protection of the Camelot Cave and wider karst system, water quality and sediment management, ecological betterment, cultural monitoring and progressive rehabilitation.

We recognise that the application includes a number of positive measures. However, given the sensitivity of the receiving environment and the proposed duration of quarrying activities, it remains important that the relevant conditions and ongoing management measures are clearly

defined and supported by monitoring and reporting. Our comments are contained in **Attachment A** to this letter.

We wish to acknowledge that Graymont has demonstrated a willingness to respond to matters raised, provide further technical information and refine aspects of its proposal. Te Nehenehenui appreciates this approach and considers that continued engagement provides an appropriate basis for resolving outstanding matters.

Thank you again for the opportunity to comment on this application.

Nāku noa, nā

p.p.

Ashleigh Turner
Signing on behalf of
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Te Nehenehenui

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