In the matter of	an application by NZSki Limited to upgrade the Remarkables Ski Area and the Doolans Expansion [FTAA-2605-1236]
By	**NZSki Limited**
	Applicant

Statement of Evidence of Gail Tewaru Tipa on behalf of Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnanga, Te Rūnanga o Awarua, Te Rūnanga o Ōtaka Aparima, Te Ao Marama Incorporated and Aukaha (1997) Limited

27 October 2026

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Introduction and experience

1 My name is Gail Tewaru Tipa.

2 I whakapapa to Kāi Tahu, with connections to a number of different marae. On my father's side, my whānau were originally from Tuahiwi, then moved to Moeraki. Therefore, I have connections to the marae at Tuahiwi, Moeraki, Puketeraki, and the Murihiku Rūnanga. However, I affiliate most strongly with Moeraki Rūnanga.

3 I hold the qualifications of a Diploma in Teaching (1982), Bachelor of Arts (Geography) (1982), a Masters of Regional Resource Planning (with credit) (1988) and a Doctor of Philosophy in Geography (2003), all from the University of Otago. My PhD focused on environmental co-management from an Indigenous perspective. I also attended the Harvard Business School Executive Programme International Women's Leadership Forum in 2013.

4 I have worked in the environmental sector for over 30 years, focusing on delivering outcomes and advocating for Māori, the environment, and the intrinsic connection between the two. In the past, I have been the South Island planner for what was formerly the Electricity Corporation of New Zealand, or ECNZ.

5 I am the Director and shareholder of Tipa and Associates Ltd.

Scope of evidence

6 This is a statement recording the effects on spiritual and cultural values, hauora, manaakitaka and rakatirataka anchored in the purpose, apology and provisions of the Ngāi Tahu Claims Settlement Act 1998 (**NTCSA**) and assessed at a landscape scale and across the generations.

7 The paragraphs in this statement are intended to add to the assessment of the cultural effects of the proposed skifield expansion on the Remarkables (**Kawarau**). It considers effects on spiritual and cultural values, on the exercise of kaitiakitaka, and on the wider cultural landscape and community. The assessment applies two integrating kaupapa Māori lenses — whānau ora and manaakitaka. Effects are assessed cumulatively as well as individually, and both adverse effects and the conditions for a positive contribution are considered.

8 My evidence covers the following matters:

(a) The statutory foundation: hauora and manaakitaka in the purpose and apology of the NTCSA;

(b) Kawarau: cultural and spiritual context;

(c) Assessment of effects on cultural and spiritual values;

(d) Assessment through a whānau ora lens; and

(e) Assessment through a manaakitaka lens.

Code of Conduct for Expert Witnesses

9 I have expertise in aspects of planning and human geography. Specifically, I am an expert in developing mechanisms that combine mātauranga Māori, particularly Kāi Tahu mātauranga, and western science frameworks to manage the environment.

10 I recognise I am not a fully independent witness in this proceeding, and at times express my opinion on matters within my expertise. However, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

The statutory foundation: hauora and manaakitaka in the purpose and apology of the NTCSA

11 The two lenses applied in this statement — whānau ora (within which hauora sits) and manaakitaka — are anchored in the NTCSA, and specifically in the purpose of the Settlement, the Crown apology recorded in Part 1 of the Act, and the recognition of rakatirataka. Because the Fast-track Approvals process is a Crown-authorised decision affecting the very interests the settlement exists to restore and protect, hauora and manaakitaka are matters a Fast-track decision-maker is required to weigh.

The purpose of the Settlement

12 The NTCSA's stated purpose is twofold: to record the Crown's apology to Kāi Tahu given in the Deed of Settlement of 21 November 1997, and to give effect to that Deed. The Deed acknowledged that Ngāi Tahu suffered grave injustices that, in the words the Act's own Preamble adopts, *"significantly impaired Ngāi Tahu's economic, social and cultural development"*

(Preamble, recital U). Social and cultural development, the wellbeing of whānau, and the relationships of care that bind people to place and to one another, are named in that single phrase, alongside economic development, as one indivisible tribal interest the settlement exists to restore.

13 Section 7 directs that the NTCSA be interpreted *"in a manner that best furthers the agreements expressed in the deed of settlement"*. Hauora and manaakitaka are therefore not "social" add-ons sitting apart from a cultural assessment; they are part of the interest the Settlement was designed to remedy, and the purpose is the interpretive frame the NTSCA imposes on every decision that engages it. An assessment that treats the wellbeing of whānau, or the capacity of mana whenua to host and care, as matters separate from culture does not further the deed — it reproduces the very compartmentalisation the settlement was meant to remedy.

The Crown apology

14 The apology, recorded in Part 1 of the Act, is the heart of the Settlement, and it speaks directly to both hauora and manaakitaka.

15 **It couples welfare with economy and development.** The Crown apologises *"for the harmful effects which resulted to the welfare, economy and development of Ngāi Tahu as a tribe"* (Apology, para 6), tying that harm specifically to the failure *"to allow reasonable access to traditional sources of food"*. Welfare, hauora, is named in the same breath as economy and development; the apology itself refuses to separate the wellbeing of whānau from the economic and cultural life of the takiwā. The hauora effects assessed in this statement are therefore effects on an interest the Crown has formally apologised for harming.

16 **It measures harm across the generations.** The Crown recognises that its failures *"deprived Ngāi Tahu of the opportunity to develop and kept the tribe for several generations in a state of poverty"* (Apology, para 4). The intergenerational dimension of hauora and whānau ora assessed in this statement, the inheritance passed to mokopuna, is the same time horizon the apology itself adopts.

17 **It speaks to manaakitaka.** The apology's concern with reasonable access to traditional food sources, and with the protection of pounamu and other valued possessions, is in tikaka terms a concern with the capacity of mana whenua to sustain themselves and to host, to extend manaakitaka from a position of standing and sufficiency rather than depletion. A settlement premised on restoring that capacity cannot be furthered by a Crown-authorised decision that further erodes it.

18 Because section 7 requires interpretation that furthers the Deed, and Part 1 records the apology as the foundation of that deed, the apology is part of the frame of reference against which the effects of any new Crown-authorised activity on hauora and manaakitaka must be weighed.

The recognition of rakatirataka

19 In fulfilment of its Treaty obligations the Crown recognises Ngāi Tahu *"as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui"* (Apology, para 7). Rakatirataka is the authority through which whānau exercise the self-determination on which whānau ora depends, and it is the standing from which manaakitaka is extended. It follows that a hauora or manaakitaka assessment which reduces mana whenua to consultation on decisions already effectively made does not reflect the rakatirataka the Crown recognised: self-determination that is confined to an advisory role is not rakatirataka, and hosting from a position stripped of authority is not manaakitaka.

Why hauora and manaakitaka are matters for Fast-track decision-making

20 The Fast-track Approvals process is a Crown-authorised consenting pathway, and the Fast-track Approvals Act (**FTAA**) specifies a requirement to act consistently with existing Treaty settlements and sets out the effect of Treaty settlements and other obligations on decision making.[1] In the context of these requirements, hauora and manaakitaka are relevant Kāi Tahu matters for decision making under the FTAA.

21 First, the settlement created forward-looking instruments, the statutory acknowledgements, Deeds of Recognition, and the nohoaka and mahika kai mechanisms, that impose ongoing obligations to have regard to Kāi Tahu values in resource-management and Fast-track processes. The wellbeing (hauora) and relational (manaakitaka) dimensions of those values fall squarely within them; they are not a separate register the decision-maker is free to disregard.

22 Second, and more fundamentally, because the Settlement's purpose, apology and recognition of rakatirataka require economic, social and cultural development to be treated as one restored interest, a Fast-track decision that enables a third party to draw value from the wāhi tīpuna while whānau bear the burdens, to their hauora, and to their capacity to manaaki, is, in the apology's own terms, a contemporary instance of the very harm the Crown apologised for. Assessing hauora and manaakitaka is therefore part of how the decision-maker gives effect to the settlement.

[1] Fast-track Approvals Act 2024, ss 7 and 82.

Kawarau: cultural and spiritual context

23 For Kāi Tahu, Kawarau is a tīpuna or ancestor in the landscape. The mauka stands over Whakatipu-wai-Māori within a wider cultural landscape that includes associations with Tāpuae-o-Uenuku and the Rākaihautū narratives, and whose alpine reaches were valued for a range of taoka species such as tikumu and taramea. The spiritual value of Kawarau resides in the integrity of the whole, the sky, the snow on the faces of the mauka, and the whakapapa relationship with the lake, the awa and the surrounding landscape.

Assessment of effects on cultural and spiritual values

Spiritual values, wairua and mauri

24 Development that alters the mountain's form or its visual and spiritual presence, such as new lifts, buildings, access roads, snowmaking infrastructure and the earthworks that accompany them, impacts values that cannot be mitigated by conventional landscaping or screening. Where the physical character of a mauka is modified, the effect is felt as an intrusion upon the wairua of the place, and this is properly assessed as an adverse cultural effect regardless of the scale of any individual works.

Kaitiakitaka, mahika kai and the taiao

25 Expansion also affects the capacity of mana whenua to exercise kaitiakitaka over Kawarau. The alpine environment holds wāhi tapu and wāhi taonga, including the fragile tarns, cirque basins and snowline habitats that sustain taoka species. Intensified use of the mountain for example greater visitor numbers, extended operating seasons, expanded terrain and the servicing that supports it will increase the risk of cumulative disturbance to these values and to the water that flows from the mountain into the wider catchment. From a Kāi Tahu perspective the mauri of the mountain and the waters sourced from it are inseparable, so pressures at altitude are understood to travel downstream, compounding effects borne by the lake and river systems downstream.

Visitor pressure, infrastructure and cumulative effects

26 The projected growth in tourist numbers that skifield expansion is intended to attract is not limited to the footprint of the development on the mauka. Increased visitation places sustained pressure on the roading, water, wastewater and energy infrastructure of Tāhuna (Queenstown) and its surrounds — infrastructure that is already strained by the district's visitor economy. For mana whenua, this raises concerns that extend beyond

amenity: the ability of the whenua and wai to absorb further demand, the pressure on wastewater and stormwater systems that ultimately discharge to culturally significant waterbodies, and the erosion of the manaakitaka that underpins the relationship between mana whenua, the community and manuhiri. Growth that outpaces the capacity of the receiving environment shifts the burden of that growth onto the very taoka Kāi Tahu are obligated to protect.

27 These effects are best understood cumulatively rather than in isolation. Each additional development on and around Kawarau is typically assessed on its own merits, yet the lived reality for those who whakapapa to this place, live here, or visit is one of incremental and compounding change: a landscape progressively busier, more built, more heavily trafficked and less able to convey the sense of a living cultural presence. For Kāi Tahu, the cumulative effect is a gradual loss of the qualities that make Kawarau spiritually and culturally distinctive: its integrity, its quiet, and its capacity to hold and transmit connection. For the wider Queenstown community and its visitors, the same trajectory registers as congestion, pressure on services and the slow erosion of the very experience the region markets itself upon. An impact assessment should therefore weigh the direct effects of the proposed expansion, and its contribution to a cumulative pattern of pressure that, over time, materially alters the relationship between people and place.

Assessment through a whānau ora lens

28 Assessed through a whānau ora lens, the effects of the proposed expansion are considered through their consequences for the wellbeing of whānau across generations. A whānau ora approach is whānau-centred, aspirational and strengths-based: it asks what the development may damage, and whether it enables whānau to thrive, to be self-determining, healthy, culturally connected, economically secure, and effective kaitiaki of their takiwā. The assessment below therefore weighs the adverse effects of expansion alongside the conditions under which the proposal could contribute positively to whānau outcomes. Where those conditions are absent, the balance of effects on whānau ora is adverse and cumulative.

Economic security

29 Economic effects are among the most material for whānau, and they cut both ways. Expansion generates employment, but tourism and skifield work is frequently seasonal, low-waged and precarious; the question is whether whānau gain access to secure, meaningful and progressive roles, or only to entry-level seasonal work that does not build long-term security. More

significant still is the effect on housing and the cost of living in the Whakatipu basin. Tourism-driven demand has made housing acutely unaffordable, and continued growth risks displacing whānau from their own rohe, the very people who hold ahi kā and whakapapa to this landscape becoming unable to remain in it. This raises a fundamental question of equity: whether the benefits of expansion flow largely to external operators and investors while the burdens, congestion, cost of living, pressure on services and environmental load, fall disproportionately on the local/host community. Conversely, where expansion is structured to deliver quality employment pathways, procurement opportunities for rūnaka and whānau enterprises, and a share of the revenue it generates, it represents the potential to strengthen the economic base on which whānau wellbeing depends.

Hauora — taha tinana and taha hinengaro

30 A whānau ora lens treats physical and mental wellbeing as inseparable from connection to place. The alpine environment of Kawarau supports the physical health of whānau through recreation, activity and the gathering of taoka, and access to the mauka is itself protective of hauora. Development that degrades that environment, or that restricts or commercialises access to it, therefore creates an impact on hauora. Equally important is taha hinengaro: the psychological and emotional toll of watching a wāhi tīpuna transformed, of economic pressure and the threat of displacement, and of the erosion of the place-based identity that grounds wellbeing. These effects are real and cumulative, and they are borne most heavily by those whose identity is bound to Kawarau.

Participation in te ao Māori and intergenerational transmission

31 The capacity of whānau to live confidently as Kāi Tahu depends on continued, practical access to Kawarau, to practise mahika kai, to observe tikaka, and to take rakatahi and mokopuna onto the mauka so that mātauraka, pūrākau and place knowledge are carried forward. This intergenerational transmission is impacted by landscape degradation: even where the physical environment is partly retained, access that is commercialised, restricted or crowded out by visitor volume can sever the everyday relationship through which cultural knowledge and identity are passed on. The assessment should therefore consider the state of the mauka and the ability of successive generations of whānau to know it, use it and belong to it.

Cohesive, resilient and nurturing whānau

32 Whānau ora depends on whānaukataka — the connectedness of whānau to one another and to place. Displacement and cost-of-living pressure thin ahi kā and fragment the whānau and community networks that sustain collective wellbeing, while over-tourism erodes the social fabric of the Whakatipu community more broadly. The ability of whānau to gather, to maintain their presence in the basin, and to nurture the next generation in relationship with Kawarau is a wellbeing outcome in its own right, and one that incremental growth can threaten.

Rakatirataka — self-management and leadership

33 A whānau ora approach is grounded in self-determination. The assessment should consider whether whānau and rūnanga exercise genuine authority in the decisions that affect Kawarau, or whether their role is confined to consultation on decisions already effectively made. Arrangements such as benefit-sharing, cultural monitoring and kaitiaki roles, and support for rūnanga capacity and capability, are the practical means by which a development can uphold rather than undermine rakatirataka. A process experienced as empowering strengthens whānau ora; one experienced as extractive diminishes it.

Intergenerational wellbeing — te taha o kā mokopuna

34 Whānau ora is explicitly intergenerational, and its ultimate measure is the inheritance passed to those not yet born. The decisions made on this proposal will shape the state of Kawarau, and the strength of the connection to it, that mokopuna inherit and they will constrain the options available to future generations to protect, use and relate to the mauka. The assessment should weigh present benefit against that inheritance, recognising that some effects on a mauka cannot be reversed by later generations however they might wish to.

Enabling whānau ora — conditions for a positive contribution

35 An assessment should identify the conditions under which the proposal could contribute positively to whānau outcomes. These include secure and progressive employment pathways for whānau; concrete commitments on affordable and staff housing to protect the ability of the community to remain in the takiwa; revenue or benefit-sharing that returns value to the host community; guaranteed and enduring access to the mauka for cultural purposes; funded cultural monitoring and kaitiaki roles; investment in restoration of the taiao; and genuine decision-making partnership with mana whenua. In the absence of such conditions, the net effect of expansion on whānau ora is assessed as adverse and cumulative.

Assessment through a manaakitaka lens

36 Manaakitaka provides a relational lens through which the proposal's effects are assessed as care, reciprocity and mana. Mana whenua carry the responsibility of ahi kā, the hosts of this takiwā, and manaakitaka is the obligation to care for manuhiri, for one another, and for the place itself. Assessed this way, the central questions are what is damaged, and whether care can still be extended and is reciprocated, and whether the mana of the hosts, the guests and the mauka is upheld or diminished. Manaakitaka connect the spiritual, economic and cumulative effects considered elsewhere in this assessment.

The host role and the capacity to Manaaki

37 Manaakitaka can only be extended from a position of standing and sufficiency; it cannot be sustained from depletion. Tourist numbers at the scale that expansion is designed to attract risk overwhelming the capacity of mana whenua to host well, to welcome, guide and care for manuhiri, and to care for their own people and local communities at the same time. The economic and displacement pressures considered above are a direct erosion of the host's capacity to manaaki: whānau who are priced out of the rohe or stretched by cost-of-living pressure risk losing the resource and the presence required to fulfil the obligations of ahi kā. Growth that outstrips the host's ability to welcome is, in manaakitaka terms, an adverse effect in itself.

Reciprocity and balance

38 Manaakitaka is reciprocal rather than one-directional; it assumes that care extended is care returned, and that the relationship between host and guest remains in balance. The assessment should ask whether manuhiri and commercial operators reciprocate the manaakitaka they receive, through respect for tikaka and place, and through tangible contribution to the host community, or whether the relationship is fundamentally extractive. Framed this way, benefit-sharing, and contribution are not merely mitigation measures but the means by which reciprocity is honoured and balance restored. An exchange in which value is drawn from the takiwā without return is a failure of manaakitaka regardless of how it appears on economic measures.

Manaaki ki te taiao

39 Manaakitaka extends beyond people to the taiao itself. Kawarau hosts all who come, resident, manuhiri and future generation alike, and the obligation of care is owed to the mauka as much as to the people upon it.

Degradation of the alpine environment, its waters and its taoka is therefore assessed not only as ecological harm but as a collective failure of manaakitaka toward the place that sustains the relationship between everyone who values it. Caring for Kawarau has to be the precondition for its continued capacity to host.

Mana — upheld or diminished

40 At its heart manaakitaka is the enhancement of mana: of the guest, of the host, and of the place. The assessment should therefore consider whether the proposal and the process surrounding it uphold or diminish the mana of mana whenua, of manuhiri, and of the mauka. Commodification of a mauka situated within a wāhi tīpuna, or engagement that reduces mana whenua to a procedural consultation step, diminishes mana and is contrary to manaakitaka however the physical effects are managed. How mana whenua are engaged is itself a measure of the manaakitaka of the proposal, not a matter separate from it.

The quality of the welcome and the manuhiri experience

41 Manaakitaka is also what manuhiri receive, and its measure is whether they leave uplifted, respected and genuinely connected to the place. Over-tourism hollows authentic hosting into transactional throughput, degrading both the welcome that can be offered and the experience that the region ultimately trades upon. The cumulative pressure on the visitor experience raised elsewhere in this assessment is a failure of manaakitaka, a diminishing of the host's ability to offer, and the guest's ability to receive, a meaningful encounter with Kawarau.

Manaakitaka in the process

42 Finally, manaakitaka applies to the conduct of the assessment and consenting process itself. A process undertaken with manaakitaka is relational, respectful and directed at upholding the mana of those involved; a process that is transactional or adversarial is, in its own terms, contrary to the value it purports to consider. The manner in which the proponent engages mana whenua, whether it builds enduring relationship or merely discharges an obligation, is therefore a legitimate and material consideration in the assessment of cultural effects.

Conclusion

43 In my opinion, the cultural values most affected by the proposed expansion are, wairua and mauri of Kawarau; the exercise of kaitiakitaka over the alpine environment and associated waterways; the ability of whānau to

maintain their relationship with, access to, and use of the mauka; the intergenerational transmission of mātauraka and cultural identity; whānau ora; manaakitaka; and the exercise of rakatirataka by mana whenua. These values are interconnected and cannot be meaningfully separated from one another.

44 The principal proposal-specific effects arise from the physical expansion of ski-field infrastructure and the consequential increase in visitor activity. These include permanent effects on the spiritual and cultural integrity of Kawarau as a wāhi tīpuna; adverse effects on wairua, mauri and kaitiakitaka; increased pressure on alpine ecosystems and water resources; cumulative strain on regional infrastructure and housing; reduced opportunities for cultural connection and intergenerational knowledge transfer; and adverse effects on whānau ora, manaakitaka and rakatirataka within the wider Whakatipu basin.

45 Overall, I consider the magnitude of the effects to be high and the cumulative significance of those effects to be substantial. In particular, the loss of cultural and spiritual values associated with the modification of a wāhi tīpuna cannot be adequately remedied, mitigated or offset. I do not consider that the current mitigation and engagement framework is capable of adequately addressing the scale and significance of the effects arising from the proposal.

46 For these reasons, I recommend that the Panel decline the application.



Gail Tewaru Tipa

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ONZM

27 October 2026