



Fast-track Approvals Act 2024 – Treaty settlements and other obligations (Section 18) report

Project Name: FTAA-2607-1258 Mangahao Hydro-Electric Power Scheme Reconsenting Project

To:	Date:
Hon Chris Bishop, Minister for Infrastructure	18/09/2026

Number of attachments: 8	Attachments: 1. Provisions of section 18 of the Fast-track Approvals Act 2024 2. Project location maps 3. List of relevant Māori groups 4. Rangitāne o Manawatū statutory acknowledgements and statements of association 5. Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua statutory acknowledgement and statement of association 6. Comments received from Tānenuiārangi Manawatū Charitable Trust 7. Comments received from Muaūpoko Tribal Trust
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Key points

1. The Ministry for Cities, Environment, Regions & Transport (on behalf of the Secretary for the Environment) has prepared this report on Treaty settlements and other obligations under section 18 of the Fast-track Approvals Act 2024 (the Act), in relation to the FTAA-2607-1258 Mangahao Hydro-Electric Power Scheme Reconsenting Project referral application.
2. The applicant, Manawa Energy Limited, is seeking to reconsent their Mangahao Hydro-Electric Power Scheme in the northern Tararua Ranges near the town of Shannon, approximately 15 kilometres north-east of Levin. The applicant is seeking a range of resource consents under the Act that would otherwise be sought under the Resource Management Act 1991 (RMA) and may seek approvals under the Freshwater Fisheries Regulations 1983. No identified Māori land is involved.

3. Section 18(2) of the Act requires that the report provide a list of relevant Māori groups, including relevant iwi authorities and Treaty settlement entities. We have identified Rangitāne o Manawatū Settlement Trust, Rangitāne Tū Mai Rā Trust, and Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua Settlement Trust, as relevant Treaty settlement entities, and Tanenuiarangi Manawatū Charitable Trust, Rangitāne o Tāmaki nui-ā-Rua, Ngāti Kahungunu ki Tāmaki-nui-a-Rua, Ngāti Kahungunu Iwi Inc, Muaūpoko Tribal Authority, and Te Rūnanga o Raukawa Incorporated as relevant iwi authorities.
4. We have identified the Rangitāne o Manawatu Claims Settlement Act 2016, Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017, and Ngāti Kahungunu ki Wairarapa Tāmaki Nui ā Rua Claims Settlement Act 2022 as relevant to the project area.
5. The Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017 provides for a statutory acknowledgement over the Manawatū River and its tributaries, and the Rangitāne o Manawatū Claims Settlement Act 2016 provides for statutory acknowledgements over the Manawatū River and its tributaries, Mangahao River, and Tararua Forest Park, and deeds of recognition over the Manawatū River and its tributaries, and the Mangahao River. The associated statutory areas encompass or lie adjacent to parts of the project area. Under the RMA and the settlement legislation, a consent authority must have regard to a statutory acknowledgement when deciding whether an iwi is an 'affected person' for the purposes of notification decisions and must provide a summary of any consent applications relevant to the statutory area to a statutory acknowledgement holder.
6. We consider the process of inviting comment (including providing information about the application) from Rangitāne o Manawatū Settlement Trust and Rangitāne Tū Mai Rā Trust under the Act is comparable to the requirements for statutory acknowledgements under the RMA and Treaty settlements. Should you accept this referral application, these groups will also be invited for comment by the panel on a substantive application under section 53(2)(c) of the Act.
7. In response to the invitation for Māori groups to comment under section 17(1)(d) of the Act, Rangitāne o Manawatū and Muaūpoko provided feedback on the application. Rangitāne o Manawatū and Muaūpoko do not support the referral application and want it to be declined due to significant long-standing impacts on environmental and cultural values, flawed assessment of environmental and cultural effects, commercial and economic factors not being appropriately balanced with environmental and cultural considerations, and the application not meeting the overall intent of section 22 criteria for referral under the Fast-track Approvals Act 2024.
8. We do not consider there are any matters identified in section 18 which make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Signature



Stephanie Frame
Manager – Fast-track Operations

Introduction

9. Under section 18 of the Act, you must consider a report on Treaty settlements and other obligations for each referral application, prepared and provided by the responsible agency (Secretary for the Environment).
10. The information which must be provided in this report includes:
 - a. relevant iwi authorities, Treaty settlement entities, applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011 (MACA), and other Māori groups with interests in the project area;
 - b. relevant principles and provisions in Treaty settlements and other arrangements;
 - c. a summary of comments and further information received from invited Māori groups; and
 - d. advice on whether it may be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts.
11. This report is structured accordingly. We have provided a list of the relevant provisions of section 18 at **Attachment 1**.

Proposed project

12. The applicant, Manawa Energy Limited, is seeking to renew the resource consents for their Mangahao Hydro-Electric Power Scheme to enable its continued operation and maintenance. The Mangahao Hydro Scheme is located in the northern Tararua Ranges near the town of Shannon, approximately 28 kilometres south-west of Palmerston North and 15 kilometres north-east of Levin. The hydro scheme dams and diverts water from the upper Mangahao and Tokomaru Rivers and conveys it via tunnels and penstocks to a power station on the western side of the Tararua Ranges, where it is discharged to the Mangaore Stream approximately 8.7 km upstream of its confluence with the Manawatu River. The Mangahao and Tokomaru Rivers are also tributaries of the Manawatu River. The hydro scheme generates up to a maximum 39.9 MW of electricity with an average annual output of 131 GWh (enough to power approximately 20,000 homes). The project includes existing operation and maintenance activities occurring across multiple land parcels, including Crown land administered by the Department of Conservation (DOC). No identified Māori identified land is involved.
13. The applicant is seeking resource consents under the Act that would otherwise be sought under the RMA which may include the damming, taking, diversion and use of water, discharge of water and contaminants (e.g. sediment) to water or land, excavation and disturbance of riverbeds, deposition of substances (e.g. gravel, silt and sediment) in riverbeds, maintenance of structures within riverbeds, and the erection and placement of structures within riverbeds. The applicant may potentially seek a standard or complex freshwater fisheries approval under the Freshwater Fisheries Regulations 1983 in relation to impacts on fish passage, pending advice on fish spawning seasons in the Mangahao River.
14. We have provided location maps at **Attachment 2**.

Relevant iwi authorities, Treaty settlement entities, and other Māori groups

15. We note that some entities identified below may be included in more than one category. We have included a composite list of all groups at **Attachment 3**.

Iwi authorities

16. Under section 4(2) of the Act, 'iwi authority' has the same meaning as in section 2(1) of the RMA:

the authority which represents an iwi and which is recognised by that iwi as having authority to do so.

17. We consider the following groups to be the relevant iwi authorities for the project area:

- a. Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua Settlement Trust, representing Ngāti Kahungunu ki Wairarapa Tāmaki nui-ā-Rua;
- b. Ngāti Kahungunu ki Tāmaki-nui-a-Rua, representing Ngāti Kahungunu ki Tāmaki-nui-a-Rua;
- c. Tānenuiārangi Manawatū Charitable Trust, representing Rangitāne o Manawatū;
- d. Rangitāne o Tāmaki nui-ā-Rua, representing Rangitāne o Tāmaki nui-ā-Rua;
- e. Te Rūnanga o Raukawa Incorporated, representing Ngāti Raukawa ki te Tonga;
- f. Muaūpoko Tribal Authority Inc, representing Muaūpoko; and
- g. Ngāti Kahungunu Iwi Inc, representing Ngāti Kahungunu.

Treaty settlement entities

18. Under section 4(1) of the Act, "Treaty settlement entity" means any of the following:

(a) a post-settlement governance entity (PSGE):

(b) a board, trust, committee, authority, or other body, incorporated or unincorporated, that is recognised in or established under any Treaty settlement Act:

(c) an entity or a person that is authorised by a Treaty settlement Act to act for a natural resource feature with legal personhood:

(d) Te Ohu Kai Moana or a mandated iwi organisation (as those terms are defined in section 5(1) of the Maori Fisheries Act 2004):

(e) an iwi aquaculture organisation (as defined in section 4 of the Maori Commercial Aquaculture Claims Settlement Act 2004).

19. Under the Act, a PSGE:

(a) means a body corporate or the trustees of a trust established, for the purpose of receiving redress in the Treaty settlement of a claimant group,—

(i) by that group; or

(ii) by or under an enactment or order of a court; and

(b) includes—

(i) an entity established to represent a collective or combination of claimant groups; and

(ii) an entity controlled by an entity referred to in paragraph (a); and

(iii) an entity controlled by a hapū to which redress has been transferred by an entity referred to in paragraph (a).

20. In keeping with the procedural principles outlined at section 10 of the Act, we only identify those PSGEs which are specified in the relevant Treaty settlement Act or Treaty settlement deed.¹

21. We have identified the following relevant Treaty settlement entities for this project area:

- a. Rangitāne o Manawatū Settlement Trust, representing Rangitāne o Manawatū, PSGE for Rangitāne o Manawatū Claims Settlement Act 2016;
- b. Rangitāne Tū Mai Rā Trust, representing Rangitāne o Wairarapa and Rangitāne o Tamaki nui-ā-Rua, PSGE for Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017; and
- c. Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua Settlement Trust, representing Ngāti Kahungunu ki Wairarapa Tāmaki nui-ā-Rua, PSGE for Ngāti Kahungunu ki Wairarapa Tāmaki Nui ā Rua Claims Settlement Act 2022.

Groups mandated to negotiate Treaty settlements

22. Muaūpoko Tribal Authority Inc has a recognised mandate to negotiate a Treaty settlement over an area which may include the project area and is in the early stages of negotiating their Treaty settlement with the Crown. Ngāti Raukawa ki te Tonga has not yet commenced the Treaty settlement process.

Takutai Moana groups and ngā hapū o Ngāti Porou

23. The project area does not include the common marine and coastal area, and accordingly there are no relevant applicant groups under MACA, and no court orders or agreements that recognise protected customary rights or customary marine title within the project area.

24. The project area is not within ngā rohe moana o ngā hapū o Ngāti Porou (as set out in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019).

Iwi or hapū whose practices are recognised under the Fisheries Act 1996 through regulation or bylaws

25. The project area does not include a taiāpure-local fisheries area, mātaihai reserve, or area subject to a bylaw or regulations made under Part 9 of the Fisheries Act 1996.

Owners of identified Māori land where electricity infrastructure or land transport infrastructure is proposed

26. Section 23 of the Act provides that, in making a decision on a referral application under section 21, the Minister may determine that, for the purposes of the project, an activity described in section 5(1)(a) is not an ineligible activity if it:

- a. is the construction of electricity lines or land transport infrastructure by (or to be operated by) a network utility operator that is a requiring authority; and
- b. would occur on identified Māori land that is Māori freehold land or General land owned by Māori that was previously Māori freehold land.

¹ Should a panel be made aware of a Treaty settlement entity established after the Treaty settlement Act is enacted (e.g. on the advice of a PSGE), then there would appear to be nothing to prevent the panel from inviting that entity to comment on the application under section 53(2)(c) of the Act.

27. This project does not involve an activity described in section 23(1) (i.e. including both (a) and (b)) of the Act.

Iwi authorities and groups representing hapū who are party to relevant Mana Whakahono ā Rohe or joint management agreements

28. If the project area is within the boundaries of either a Mana Whakahono ā Rohe or joint management agreement, and the application includes a proposed RMA approval described in section 42(4)(a) to (d) (resource consent, certificate of compliance, or designation), we are required to identify the relevant iwi authority/group that represent hapū that are parties to these arrangements.
29. We have not identified any Mana Whakahono ā Rohe or joint management agreements that are relevant to the project area, and accordingly there are no parties to these arrangements to identify.

Any other Māori groups with relevant interests

30. We have not identified any other Māori groups with relevant interests in addition to (or who may otherwise be represented by) those groups already covered in the sections above.
31. For your information, the applicant has consulted with Rangitāne o Manawatū, Rangitāne Tamaki-nui-ā-Rua, Rangitāne o Wairarapa, Ngāti Kahungunu ki Tamaki-nui-ā-Rua, Muaūpoko, Ngāti Raukawa ki te Tonga, and Ngāti Whakare (a hapū of Ngāti Raukawa ki te Tonga).

Relevant principles and provisions in Treaty settlements and other arrangements

Treaty settlements

32. Under section 4(1) of the Act, a Treaty settlement includes both a Treaty settlement Act and a Treaty settlement deed which is signed by both the Crown and representatives of a group of Māori.
33. The following Treaty settlements relate to land, species of plants or animals, or other resources within the project area:
- a. Rangitāne o Manawatū Claims Settlement Act 2016;
 - b. Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017; and
 - c. Ngāti Kahungunu ki Wairarapa Tāmaki Nui ā Rua Claims Settlement Act 2022.

Relevant principles and provisions

34. Section 7 of the Act requires all persons exercising powers and functions under the Act to act in a manner consistent with Treaty settlements. The relevant principles and provisions for each of these settlements are set out below.

Crown acknowledgements and apologies

35. The Crown offers acknowledgements and an apology to relevant groups as part of Treaty settlement redress to atone for historical wrongs that breached te Tiriti o Waitangi/the Treaty of Waitangi, to restore honour, and begin the process of healing.

36. As part of its apologies to Rangitāne o Manawatū, Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua, and Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua, the Crown stated that it looked forward to building a new relationship with these groups based on co-operation, mutual trust, and respect for te Tiriti o Waitangi/the Treaty of Waitangi and its principles. The redress mechanisms provided for in Treaty settlements should be viewed in the context of these intentions.

Statutory acknowledgements

37. Water for the Hydro Scheme is dammed and diverted high in the northern Tararua Ranges from the Mangahao and Tokomaru Rivers to a powerhouse on the western side of the Ranges, and then discharged to the Mangaore Stream, a tributary of the Manawatū River. The Hydro Scheme largely occupies land and riverbed within the Mangahao and Tokomaru Valley Conservation Areas, Tokomaru Valley Road Conservation Areas, Tararua Forest Park and privately owned land.
38. The project area is located within, or may affect, statutory areas for statutory acknowledgements provided for in the Rangitāne o Manawatū Claims Settlement Act 2016 and Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017. We have included deed plans and statements of association for the relevant statutory areas at **Attachments 4 and 5** showing the location of the project area in relation to these statutory acknowledgements.
39. The Rangitāne o Manawatū Claims Settlement Act 2016 includes statutory acknowledgements in relation to the Manawatū River and its tributaries, the Mangahao River, and Tararua Forest Park. The statutory area for the Manawatu River and its tributaries includes the entire Manawatū catchment and tributaries downstream of the eastern end of the Manawatū Gorge. It also includes headwater catchments of tributaries on the eastern side of the Ruahine and Tararua Forest Parks but not catchments downstream of the Parks' eastern boundaries. The statutory area over the Mangahao River extends from the Lower Mangahao Dam roughly to the eastern boundary of Tararua Forest Park. The Mangahao River statutory acknowledgement also includes the section of Tokomaru River from the Tokomaru Dam downstream to Tokomaru township, and the Mangaore Stream from its headwaters to its confluence with the Manawatū River near Shannon.
40. The statutory area over part of the Tararua Forest Park in the northern Tararua Ranges is roughly wedged shaped and extends from its broadest end near the Lower Mangahao Dam to a point west of Mangamaire in the north. The western margins of this statutory area are situated adjacent to the Lower Mangahao Dam, Tokomaru Dam, and the access road between the two dams.
41. The Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017 includes a statutory acknowledgement over the Manawatū River and its tributaries within the area of Interest. This includes the entire catchment of the Manawatū River upstream of Ashhurst (including Mangahao River), the Pohangina River, and headwaters of the Oroua River. The Mangahao River lies within this statutory area, flowing northeast from the Tararua Ranges to join the Manawatū River near the eastern end of the Manawatū Gorge roughly 7km upstream of Ashhurst.
42. We note the applicant is not proposing any new works over and above the existing facilities and current operational regime of the Hydro Scheme. Activities that have potential to affect the Mangahao River, Tokomaru River, Mangaore Stream and other parts of the above statutory areas include maintenance of residual flows, fluctuating flows including large releases of water, and sediment flushes from dams.

43. Under the RMA and relevant Treaty settlement Acts, a consent authority must, when considering a resource consent for a proposed activity that is within, adjacent to, or affecting a statutory area:
- a. provide a summary of the application to the holder of the statutory acknowledgement. The summary of the application must be the same as would be given to an affected person by limited notification under the RMA. The summary must be provided as soon as is reasonably practicable after the relevant consent authority receives the application, but before they decide whether to notify the application; and
 - b. have regard to the statutory acknowledgement when deciding whether the holder (generally a PSGE) is an 'affected person' for the purposes of notification decisions under the RMA.²
44. The holder of a statutory acknowledgment may also cite the statutory acknowledgment as evidence of their association with a statutory area in any submission before a relevant consent authority (or the Environmental Protection Authority), board of inquiry, Environment Court, Heritage New Zealand Pouhere Taonga), who may, in turn, take those statutory acknowledgements and deeds of recognition into account.
45. We consider the process of inviting comment (including providing information about the application) under the Act is comparable to the process under Treaty settlement and the RMA of providing those who hold statutory acknowledgements with a summary of the application. You have already invited Rangitāne o Manawatū Settlement Trust and Rangitāne Tū Mai Rā Trust, as relevant Treaty settlement entities, to comment on the application. Should you accept this referral application, these groups will also be invited for comment by the panel on a substantive application under section 53(2)(c) of the Act.

Deeds of recognition

46. A deed of recognition may be entered into between a PSGE and the Crown agency managing any statutory area for which a statutory acknowledgment has been agreed. The Rangitāne o Manawatū Claims Settlement Act 2016 provides for a deed of recognition to be entered into with each of the Minister of Conservation and Director General of Conservation, and the Commissioner of Crown Lands, in relation to the Manawatū and Mangahao Rivers, and with the Minister of Conservation and Director General of Conservation in relation to Tararua Forest Park. Under section 38(2) of the Rangitāne o Manawatū Claims Settlement Act 2016, a deed of recognition over a river applies only to a part of the bed of the river or stream owned by the Crown, which is the land that the waters of the river or stream cover at their fullest flow without flowing over the banks of the river or stream.
47. The Rangitāne o Manawatū settlement provides that the Minister of Conservation and the Director General of Conservation, or the Commissioner of Crown Lands, as the case may be, must, if undertaking certain activities within an area that a deed of recognition relates to, consult Rangitāne o Manawatū Settlement Trust and have regard to its views concerning the Trust's association with the area as described in a statement of association.
48. Under section 2 of the deed of recognition relating to the Manawatū and Mangahao Rivers, the Minister of Conservation and the Director General of Conservation must consult Rangitāne o Manawatū Settlement Trust on the following activities:

² In addition to consent authorities, the Environment Court and Heritage New Zealand Pouhere Taonga must also have regard to statutory acknowledgements in relation to some of their processes.

- a. preparing a conservation management strategy, or a conservation management plan, under the Conservation Act 1987 or the Reserves Act 1977:
 - b. preparing a national park management plan under the National Parks Act 1980:
 - c. preparing a non-statutory plan, strategy, programme, or survey in relation to a statutory area that is not a river for any of the following purposes:
 - i. to identify and protect wildlife or indigenous plants:
 - ii. to eradicate pests, weeds, or introduced species:
 - iii. to assess current and future visitor activities:
 - iv. to identify the appropriate number and type of concessions:
 - d. preparing a non-statutory plan, strategy, or programme to protect and manage a statutory area that is a river: and
 - e. locating or constructing structures, signs, or tracks.
49. None of the activities listed in paragraph 48 above appear to be relevant for this application.
50. As noted above, the three dams and associated reservoirs and other components of the Mangahao Hydro Scheme are located on or above land and riverbeds administered by DOC, however, these activities are authorised by a vesting order. The Hydro Scheme operates under easement rights vested by the State-Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997, made under section 28 of the State-Owned Enterprises Act 1986. The vesting order provides for dams and structures, and easements relating to water storage and release, water conveyance, rights of way, and electricity and communications infrastructure across affected land, including public conservation land. DOC advises that these existing easement arrangements enable the proposed activities and that no additional concessions are required.

Manawatu River Catchment Advisory Board

51. The Rangitāne o Manawātū Claims Settlement Act 2016 provides for the establishment of the Manawatu River Catchment Advisory Board (the Advisory Board). The purpose of the Advisory Board is to provide advice to the Manawātū–Whanganui Regional Council in relation to freshwater management issues concerning the Manawatu River catchment. If the Advisory Board and the Regional Council agree in writing, the Advisory Board may provide advice to the Regional Council on any other matter. This could include advice on resource consents such as those sought for the Mangahao Hydro Scheme.
52. The Advisory Board, which is yet to be established, is to be comprised of one member each appointed by Rangitāne o Manawatu Settlement Trust, Rangitāne Tū Mai Rā Trust, Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua Settlement Trust, and representatives of iwi who become entitled to appoint a member under another enactment i.e. other settlement legislation.
53. As the Manawatu River Catchment Advisory Board is yet to be established, there is no advice or comments to consider in respect of the Advisory Board at this time.
54. Ultimately, iwi and hapū are likely to have cultural associations with ancestral lands, water, sites, wāhi tapu, and other taonga beyond what is specifically identified in a Treaty settlement or other arrangements. Local tangata whenua and their representatives would be best placed to advise on such matters in the first instance.

Customary Marine Title/Protected Customary Rights

55. As noted above, the project area is not within a customary marine title area, protected customary rights area, or within or adjacent to ngā rohe moana o ngā hapū o Ngāti Porou.

Taiāpure-local fisheries/mātaitai reserves/areas subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996

56. As noted above, the project area does not include a taiāpure-local fishery, mātaitai reserve, or area subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996.

Mana Whakahono ā Rohe/Joint management agreement

57. As noted above, we have not identified any Mana Whakahono ā Rohe or joint management agreements that are relevant to the project area.

Summary of comments received and advice

Comments from invited Māori groups

58. Pursuant to section 17(1)(d) of the Act, on 3 August 2026 you invited written comments from the Māori groups identified above in paragraphs 17 to 21, from a list we previously provided you. These groups were provided with access to the application material and had 15 working days from receipt of the copy of the application to respond.

59. You received comments on the application from Tānenuiārangi Manawatū Charitable Trust on behalf of Rangitāne o Manawatū, and Muaūpoko Tribal Authority on behalf of Muaūpoko, which can be summarised as follows:

- a. Rangitāne o Manawatū have longstanding cultural, spiritual, historical, and traditional associations with the lands and waters of the Manawatū awa and its tributaries, and the Tararua Forest Park. Rangitāne o Manawatū does not support the referral application and consider it should be declined for the following reasons:
 - i. concerns that the Mangahao hydro scheme created long standing unmitigated environmental and cultural issues from its inception i.e. the scheme was developed when the impacts of on freshwater ecosystems and iwi values were not well understood or addressed and remains the case in respect of this application;
 - ii. concerns about significant adverse effects on cultural and spiritual values, ecology, landscape, natural and physical resources of special value, and effects arising from the discharge of contaminants (sediment). The Mangahao River, Tokomaru River, Mangaore Stream, and Arapeti Stream have been fundamentally altered by the hydro scheme;
 - iii. particular concern about hydrology and minimum flows, freshwater ecology and fish passage, sedimentation and river dynamics, mauri and ki uta ki tai principles in relation to inter-catchment water transfers, and the effects of climate change;
 - iv. concerns about information gaps and flaws in the applicant's assessment of effects in relation to the baseline approach, data sets, framing of environmental mitigations, and minimisation of cultural impacts;
 - v. concerns that standard environmental protections, such as 'flow restrictions' and 'complex conditions' which would be otherwise imposed under the

RMA, could be framed as causes of significant loss of energy production in the Fast-track process;

- vi. concerns that an ecologically and culturally irresponsible operating regime could be locked in for 35 years (the consent duration sought) if no operational changes or appropriate management of effects (e.g. minimum flow provisions) are implemented;
- vii. Rangitāne o Manawatū consider that:
 - the application does not strike the right balance between providing for commercial, environmental, and cultural values;
 - the application does not meet the overall intent of section 22 criteria under the Fast-track Approvals Act 2024 for application referral; and
 - the Fast-track process is inappropriate for reconsenting the Mangahao hydro scheme.
- viii. Should the application be accepted for referral, Rangitāne o Manawatū requests that:
 - the decision-making panel includes independent experts in mātauranga Māori, tikanga, and cultural health monitoring, freshwater ecology and fish passage management, hydrogeology and sediment dynamics;
 - conditions of consent that require: 1) adaptive flow management regimes that adjust water abstraction limits based on real-time climate, temperature, and ecological health indicators; and 2) comprehensive dam safety, sediment flushing, and flood management plans developed in active partnership with Rangitāne o Manawatū as kaitiaki.
- b. Muaūpoko holds ancestral rights as tangata whenua across Te Ūpoko o Te Ika (Wellington Region) including the Tararua Ranges, which are a sacred to Muaūpoko, and the ancestral waterways of the Mangahao River, Tokomaru River, Mangaore Stream, and Arapeti Stream. This area encompasses ancient tracks, mahinga kai, sanctuaries, peaks, and other features that have immense cultural and spiritual associations for Muaūpoko. Muaūpoko Tribal Authority does not support the referral application and considers that it should be declined for the same reasons given by Rangitāne o Manawatū.

60. We note that Muaūpoko and Rangitāne o Manawatū share the same concerns about the Mangahao hydro scheme, and that the comments provided by Muaūpoko Tribal Authority and Rangitāne o Manawatū are practically identical.

Consultation with departments

61. In preparing this report, we are required to consult relevant departments. We previously sought advice from Te Puni Kōkiri and the Office of Treaty Settlements and Takutai Moana – Te Tari Whakatau regarding relevant Māori groups in this area, and have incorporated their views into this report.

Advice on whether it may be more appropriate to deal with the proposed approvals under another Act/s

62. Under section 18(2)(m), this report must include our advice on whether, due to any of the matters identified in section 18, it may be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts.

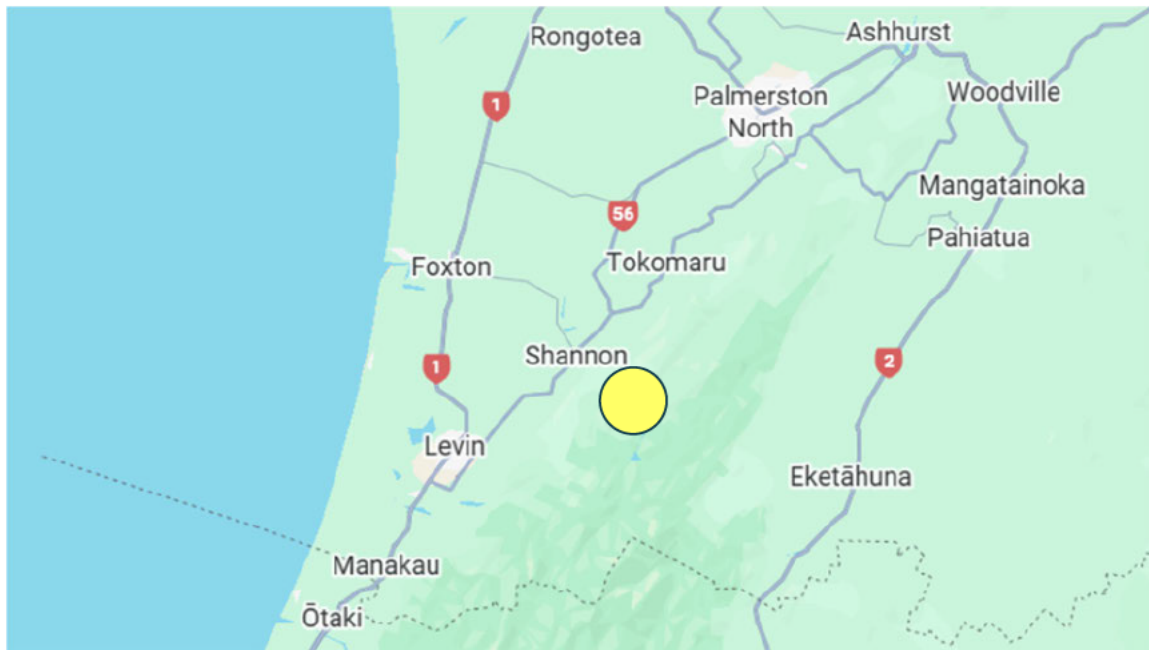
63. We do not consider there are any matters raised in this report which make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Attachment 1: Provisions of section 18 of the Fast-track Approvals Act 2024

Section	Information required	Paragraph reference in this report
18(1)	The Minister must, for a referral application, consider a report that is prepared and provided by the responsible agency in accordance with this section.	9, 10
18(2)(a)	Any relevant iwi authorities and relevant Treaty settlement entities	17, 21
18(2)(b)	Any Treaty settlements that relate to land, species of plants or animals, or other resources within the project area	33
18(2)(c)	The relevant principles and provisions in those Treaty settlements, including those that relate to the composition of a decision-making body for the purposes of the Resource Management Act 1991	34, 54
18(2)(d)	Any recognised negotiation mandates for, or current negotiations for, Treaty settlements that relate to the project area.	22
18(2)(e)	Any court orders or agreements that recognise protected customary rights or customary marine title within the project area.	23, 55
18(2)(f)	Any applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011 that seek recognition of customary marine title or protected customary rights within the project area.	23, 55
18(2)(g)	Whether the project area would be within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou (and, if so, the relevant provisions of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019).	24, 55
18(2)(h)	Whether the project area includes any taiāpure-local fisheries, mātaihai reserves, or areas that are subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996 (and, if so, who the tangata whenua are).	25, 56
18(2)(i)	Whether the project involves an activity that could be the subject of a determination under 23 (and, if so, who the owners of the land are).	27
18(2)(j)	If the proposed approvals include an approval described in any of section 42C(4)(a) to (d) (resource consent, certificate of compliance, or designation), (i) iwi authorities and groups that represent hapū that are parties to any relevant Mana Whakahono ā Rohe or joint management agreements.	29, 57

	(ii) The relevant principles and provisions in those Mana Whakahono ā Rohe and joint management agreements.	
18(2)(k)	Any other Māori groups with relevant interests.	30
18(2)(l)	A summary of— (i) comments received by the Minister after inviting comments from Māori groups under section 17(1)(d) and (e); (ii) any further information received by the Minister from those groups	58-60
18(2)(m)	The responsible agency's advice on whether, due to any of the matters identified in this section, it may be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts.	63
18(3)	In preparing the report required by this section, the responsible agency must consult relevant departments.	61
18(4)	The responsible agency must provide the report to the Minister not later than 20 working days after the date for providing comments under section 17(6).	N/A
18(5)	However, if the Minister requests further information about a referral application under section 20, the time period specified in subsection (4) ceases to run for the period of time specified in the request.	N/A

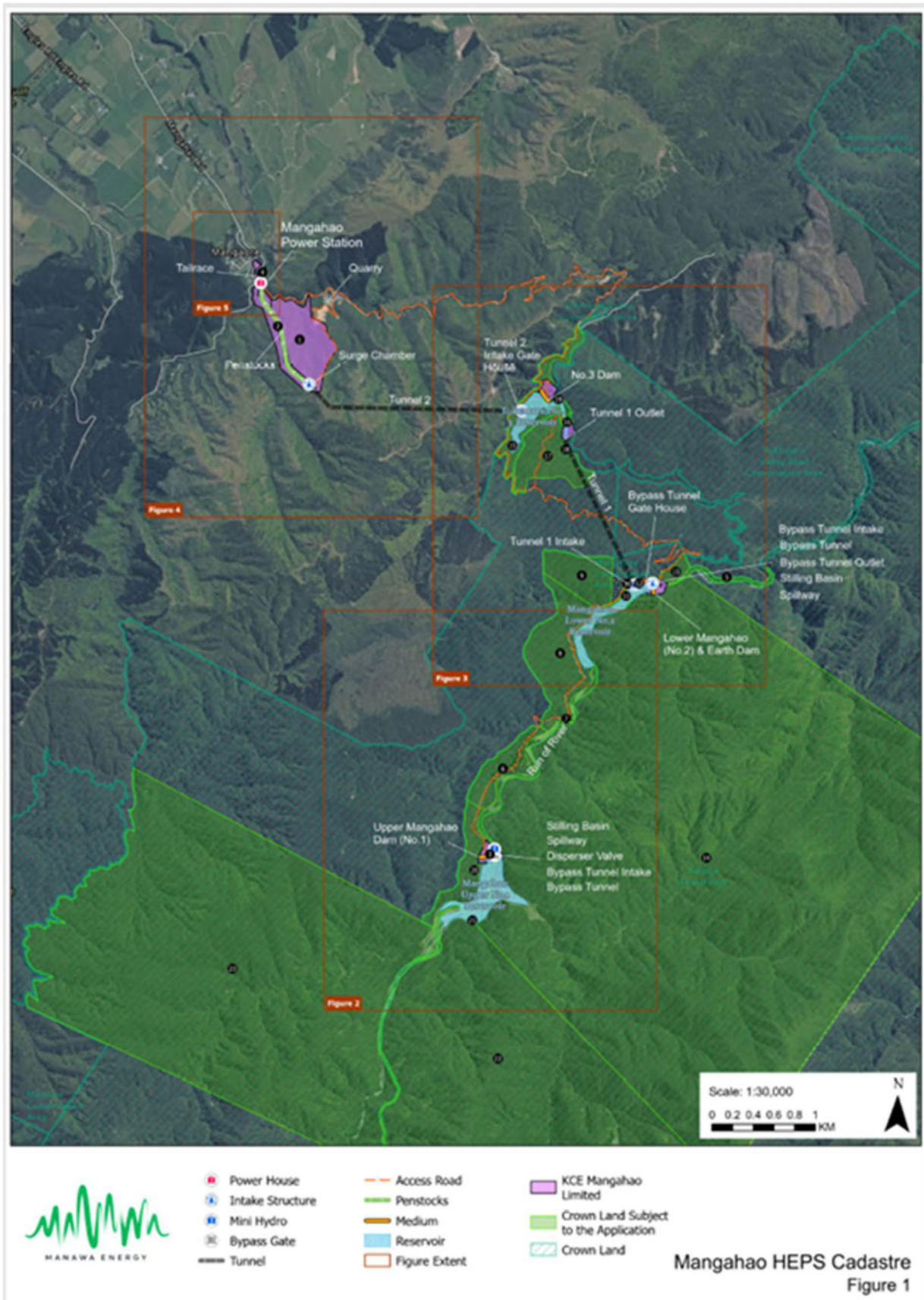
Attachment 2: Project location maps



Map 1. Location of Mangahao Hydro Scheme indicated by yellow circle above



Map 2. Location of Mangahao Hydro Scheme project area indicated by red marking above



Map 3. General layout of Mangahao Hydro-Electric Scheme

Attachment 3: List of relevant Māori groups

Name of group	Type of group (section of Act)
Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua Settlement Trust	Iwi authority (s18(2)(a)), Treaty settlement entity (s18(2)(a) – Ngāti Kahungunu ki Wairarapa Tāmaki Nui ā Rua Claims Settlement Act 2022
Rangitāne Tū Mai Rā Trust	Treaty settlement entity (s18(2)(a) – Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017
Rangitāne o Manawatū Settlement Trust	Treaty settlement entity (s18(2)(a) – Rangitāne o Manawatū Claims Settlement Act 2016
Muaūpoko Tribal Authority Inc	Iwi authority (s18(2)(a)), mandated entity (s18(2)(d))
Te Rūnanga o Raukawa Incorporated	Iwi authority (s18(2)(a))
Ngāti Kahungunu ki Tāmaki-nui-a-Rua	Iwi authority (s18(2)(a))
Ngāti Kahungunu Iwi Inc	Iwi authority (s18(2)(a))
Tānenuiārangi Manawatū Charitable Trust	Iwi authority (s18(2)(a))
Rangitāne o Tāmaki nui-ā-Rua	Iwi authority (s18(2)(a))

Attachment 4: Rangitāne o Manawātū statutory acknowledgements and statement of association

Rangitāne o Manawātū statutory area over the Manawātū River and its tributaries from the deed of settlement



Approximate location of Mangahao Hydro Scheme indicated by red triangle.

Rangitāne o Manawātū statement of association regarding the Manawātū River and its tributaries from the deed of settlement

Manawatu River and tributaries (as shown on deed plan OTS-182-20)

The Manawatu River is of immense historical, cultural, spiritual and traditional significance to Rangitāne o Manawatu. The Manawatu River was the main route for travel and communication for Rangitāne o Manawatu with settlements along the margins of the river.

Rangitāne o Manawatu has a rich belief system and structure that has developed over hundreds of years of occupation. The belief system developed a number of spiritual and ritualistic practices that occur at different times and locations along the Manawatu River. A large number of these practices have disappeared due to the introduction of European culture and Christianity.

The Manawatu River was created through the spirit of Okatia, who gave life to a totara growing on the slopes of the Puketoi Range in the Hawkes Bay. The totara made its way to the mountain ranges of the Ruahine and Taranaki, and as it forced its way through the ranges, it created the Manawatu Gorge and the Manawatu River as it made its way out to sea. For Rangitāne o Manawatu traditions such as this, represent the significant links between the cosmological world and the modern world, which have shaped Rangitāne o Manawatu.

The name Manawatu was bestowed on the River by the Rangitāne Tohunga Haunui a Nanaia, over six hundred years ago. Whilst searching for his wife, Waireka, Hau travelled down the West Coast of the North Island crossing and naming many waterways. When he reached a turbulent flowing river which caused his heart to sink as he thought he may not be able to cross it and continue his search, he called the River Manawatu.

The spiritual connection that Rangitāne o Manawatu have with the River is evidenced by the building of churches along the River such as the Church Turongo Hiha. It was here that an aged Rangitāne Chief related to the assembled people that he had had a momentous dream the previous night. He dreamed that he was standing at the foot of two great totara trees somewhere on the bank of the Manawatu River and that these trees were talking to each other. The first tree said, "Do you know who I am?" "No," was the reply. "I am whangarae (the god of the forehead)," said the first. "Oh. Do you know who I am?" asked the second. "I am whangaihu (the god of the nose)." And they both chanted an incantation. Hiha remembered this karakia and recited it to the assembly. So, on an appointed day, three large canoes made their way up the River to search for the trees. They finally discovered them at a place called Kairanga, near where the Linton Army Camp now stands. The trees were felled and floated down the River to Moutoa where they were pit-sawn into timber. The timber produced by these two great totara was sufficient not only to build the Church but also the furnishings, including a beautifully carved altar. The church was subsequently bestowed with the name Turongo.

Located within the Manawatu River, are many taonga of significance to Rangitāne o Manawatu. There is Te Au-rere-a-te-Tonga, the flowing current of the south, Te Au-nui-a-Tonga, the waterfall located in the gorge, as is the tapu rock Te Ahu a Turanga, which remains visible even in the highest of floods.

There were many Rangitāne o Manawatu kaitiaki guardians of the River. These included Peketahi who lived at Puketotara, and Whangaimokopuna who lived near Hotuiti, also known as Motuiti until he was banished and now lives up in the hills at Raekatia. Whenever Rangitāne people from the lower reaches of the River visit that area, a mist descends which is Whangaimokopuna weeping for his old friends.

Rangitāne o Manawatu practised a number of rituals along the Manawatu River where its resources were utilised. These sites later developed into tapu or wāhi tapu sites. Most if not all of these sites have now been lost (in private or local government ownership) or destroyed due to engineering works.

The Manawatu River and its large number of waterways provided the main highway for Rangitāne o Manawatu and as well as being a mahinga kai in its own right, it fed into the land based mahinga kai. Along the Manawatu River, were located numerous Rangitāne o Manawatu Pa, which have now become one with the River and their locations and the myriad of trails used by Rangitāne o Manawatu, remain an integral part of our traditional history. The traditional mobile lifestyle of Rangitāne o Manawatu, led to their dependence on the Manawatu River and its resources.

Because of the long history of the Manawatu River in providing the highway and mahinga kai to Rangitāne o Manawatu, both on a temporary and permanent basis, there are numerous urupa, wāhi tapu and wāhi taonga associated with the River and Rangitāne o Manawatu. These associations hold the memories, traditions, victories and wairua of Rangitāne o Manawatu tupuna, and many locations therefore, remain unknown to the wider public.

The most significant quality that flows through the Manawatu River is its mauri which binds all the physical, traditional and spiritual elements of all things together, generating, nurturing and upholding all life. That mauri is the most crucial element that binds Rangitāne o Manawatu with the Manawatu River, and that relationship has consisted for over seven hundred years of unbroken occupation.

The interconnected waterways of the Manawatu form a dendritic pattern across the landscape. The mauri supplied from the mountains and areas in the gorge is transported along these waterways to nourish and feed the land and everything living on the land. The Manawatu River for Rangitāne o Manawatu is seen as the main artery in this network containing the strongest and greatest amount of mauri. If any activity that disrupts the flow of the waterway or pollutes the watercourse it is seen as having a negative impact on the mauri which then in turn has a direct negative impact on Rangitāne o Manawatu land and people.

Rangitāne o Manawatu occupation of the Manawatu River continues today after several hundred years. To secure the natural resources needed to sustain Rangitāne o Manawatu and protect the people from neighbouring iwi, Rangitāne o Manawatu developed a number of Pa in strategic locations. These Pa were situated near their most valuable natural resources as well as in strategic positions, particularly along the Manawatu River.

Rangitāne o Manawatu occupied a large area of the Manawatu and developed into a number of whanau based hapu that were responsible for certain geographical areas and natural resources along the Manawatu River. Each hapu interacted with the river and the river flowed through each hapu rohe. These are outlined:

Ngāti Mairehau (Also known as Ngāi Tuahuriri)

Occupied the east bank of the Manawatu River around Turitea to Tokomaru and over the Tararua Ranges to Pahiatua. More specifically along the northwest bank between Ngāwhakaraua and Awapuni.

Ngāti Hineaute

Occupied the land along the Manawatu River from Te Apiti to the northern boundary of Palmerston North City.

Ngāti Rangitepaia (Also known as Ngāti Rangi)

Were based on land from the southern boundary of the city to the confluence of the Oroua and Manawatu Rivers.

Ngāti Rangiaranaki

Shared the riverbank of the Manawatu River from Te Apiti to Palmerston North with Ngāti Hineaute.

Ngāti Tauira

A shared Rangitāne – Ngāti Apa hapu located around the Oroua River above Mangawhata extending to the Rangitikei River and coastal area.

Ngāti Te Kapuarangi

Occupied the upper Manawatu catchment and Pohangina area.

The Manawatu River, its geomorphology and human geography can be divided into distinct reaches. Each reach, having a unique environment, meant Rangitāne o Manawatu interacted with that environment accordingly.

Te Apiti (“The Gorge”)

This part of the River was recognised for its spiritual connections and significance. As identified the Gorge was carved by a great spirit Okatia cutting its way through the active rising mountain range, the backbone of Te Ika A Maui, allowing the waters to flow from east to west. This active mountain range is a source of mauri for Rangitāne o Manawatu hence the mauri is then transported by the waters of the River to the rest of the rohe. The majority of the sites of significance in this stretch of the River are related to the identification and preservation of mauri in the River.

Otangaki – Papaeioa (Palmerston North) – Puketotara

Geographically this stretch consisting of a steep, gravelly bed with defined flood plain contained a number of strongholds and Pa. These Pa were used in times of attack as well as to prepare warriors for battle. These Pa also controlled the entrance to the Gorge as well as various crossings over the Ranges.

This stretch of what used to be clear clean water was also used seasonally to gather resources and foods from various locations in the Ranges as well as along the River and used in ritual practises at the related Pa.

Puketotara was the largest Pa in the area and the central point of the Rangitāne rohe. This site was home to all Rangitāne and numerous events occurred there that determined the future of Rangitāne o Manawatu.

Puketotara – Te Papa Ngaio (Shannon/Opiki/Foxton)

This stretch of the River was the most intensively populated and utilised section of the River for Rangitāne o Manawatu. In this area were numerous Rangitāne o Manawatu papakainga and kainga as well as large areas of cultivations. This part of the Manawatu River was a highway for a large amount of traffic for travel, communication and to access the rich supply of resources contained within the lowland forests and swamps. Associated with the intense population were also numerous sites of ritualistic practice and worship.

Ngāwhakaraua was a large Pa situated on a great horseshoe bend of the Manawatu River, slightly upriver and east of the river's confluence with the Oroua River, and one mile south of the Opiki toll bridge. The pa was occupied by Rangitāne o Manawatu and covered 86 acres of land. The principal buildings were, Te Ahu A Turanga Church, moved from Puketotara c.1879

and destroyed by fire c.1907, although replaced with a smaller building and a wooden whare runanga, 'Kotahitanga.' Kotahitanga represented the kaupapa of unity. Ngāwhakaraua was in use as a mahinga kai for some time before the establishment of a Pa in the locality, which indicates there were sufficient food resources on the surrounding land to sustain a resident population.

Te Papa Ngaio – Okatia Beach (Opiki to Foxton Beach)

The coastal area of the Manawatu River was extremely important to Rangitāne o Manawatu. Not only was this area a rich source of kai moana and other natural resources but Rangitāne o Manawatu were also able to participate in trade with other iwi and groups travelling along the coastline. One of the greatest resources in this area was the Tapuiwaru swamp (now referred to as the Moutoa floodway). It was also a very important area as it was the main access point to the Manawatu River and to the East Coast of the North Island.

Rangitāne o Manawatu - Significant Sites

Along the Manawatu River in the Rangitāne o Manawatu rohe there are 185 recorded sites of significance. The majority of these sites of settlement and occupation and would have had permanent structures associated with them.

Approximately ten of these sites were substantial cultivations or eel weirs that were recorded in historical accounts.

A number of mahinga kai, traditional food gathering areas, and nohoanga, areas of seasonal settlement were located along the River. However a number of these have been destroyed and lost due to engineering works and the moving of the watercourse of the River as the result of engineering works. Over the last one hundred years with constant land use change Rangitāne o Manawatu cultural landscape and its traditional use has been destroyed and lost.

Significant Sites Associated with the Manawatu River

NAME	DESCRIPTION	NAME	DESCRIPTION
Ahiaruhe	Kainga	Kari Kari	Occupied location
Ahimate	Pa	Kari kari	Site river
Ake Ake	Kainga	Kimi-Mai-I-Tawhiti	Kainga
Animate (Ahimate)	Kainga	Kopuanui	Pa
Aramari	Kainga	Kopu-Toroa	Kainga
Aratangata	Stream	Kopu-Toroa	Stream
Atiki	Kainga	Koterara	Kainga
Awatapu	Lagoon	Kotoura	Kainga
Haumahangi	Occupied location	Koturua	Occupied location
Haumiaroa	Kainga	Koutu Roa	Pa
Heiomarama	Occupied location	Kupenga	Kainga
Hekinui	Occupied location	Kuti Kuti	Occupied location
Hikaretu	Kainga	Kutikuti-Rau	Kainga
Hokonui	Occupied location	Mahoe	Kainga
Hokorawa	Kainga	Mako Makonui	Kainga
Hokowhitu	Kainga	Manawa Kai Hiekie	Kainga
Hokowhitu	Ceremonial site	Manawatu	River
Hokowhitu	Reserve	Mangaone	Kainga
Hotaneiti	Cultivation	Manuwaru	Bush
Iwi Te Kai	Reserve	Marae Tarata	Pa
Iwihi	Papa kainga	Mararatapa	Pa

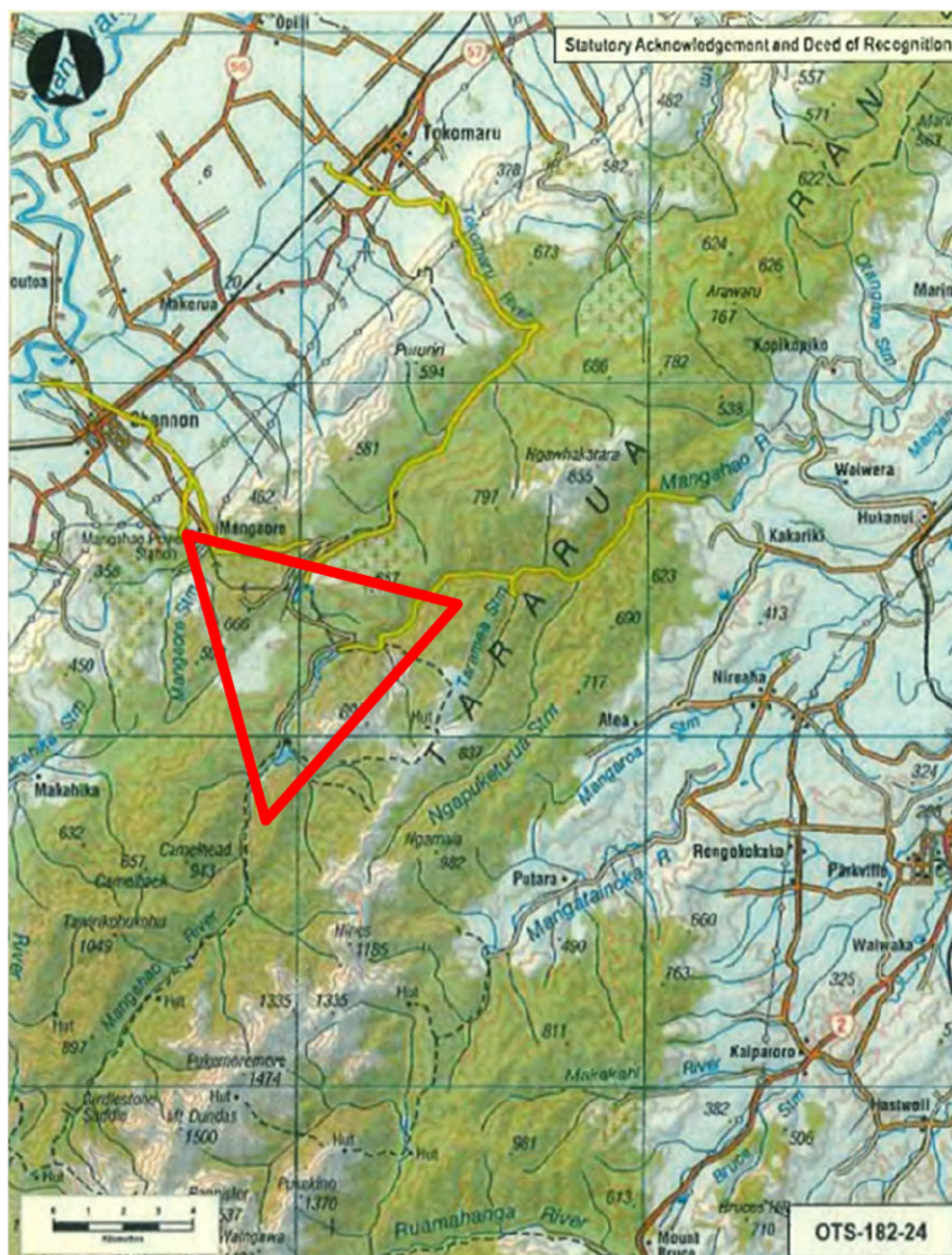
NAME	DESCRIPTION	NAME	DESCRIPTION
Kahikatea	Kainga	Marotira	Church
Kahutara	Papa kainga	Mata Karapa	Pa
Kaimuapi	Occupied location	Mata-Ara	Kainga
Kaingapipa	Kainga	Mikihi	Stream
Kai-Wahie	Kainga	Moengareha	Kainga
Karamuremu	Kainga	Mokomoko	Papa Kainga
Karanga Hiku	Kainga	Morotira	Kainga
Karatangiutu	Kainga	Motua	Occupied location
Karere	Kainga	Motuere	Occupied location
Karere	Urupa	Moutoa	Post office location
Karere	Lagoon	Nga Totara	Fossil forest
One-Poto	Kainga	Nga Wakahiamoe	Waka mooring
Opaekete	Kainga	Nga Whakaraia	Pa
Opiki	Kainga	Ngataiawatea	Kainga
Oriko	Stream	O-Hine-Kake-Ao	Area
Orua-rongo	Kainga	Ohineninipeka	Ara Kiore
Otane	Kainga	Okatia	Beach
Otangaki	Pa	Okehu	Kainga
Otangaki	Clearing	Pukemahau	Kainga
Otatara	Kainga	Puketotara	Pa
O-Tawhiti	Kainga	Puketotara	Papa Kainga
Otekura	Stream	Puru-rarauha	Kainga
Otini	Kainga	Rameke	Whare
Pahiaroa	Kainga	Rangi Po	Cultivation
Paiaka	Kainga	Rongo-Karaka	Urupa
Pane-Iri	Pa	Roto Ngarara	Lagoon
Papa Kino	Occupied location	Rotopiko	Lagoon
Parahaki	Kainga	Ruahine	Range
Paretao	Kainga	Rua-Poho	Kainga
Pari-Kawau	Kainga	Ta Horo	Clearing
Pikau-Tahi	Pa	Tahitiki	Kainga
Pohue-Tangi	Kainga	Tahumatara	Kainga
Pokapoka	Kainga	Tai I Mate	Pa
Puka Puka	Occupied location	Tai I Tahi	Kainga
Tau Waka	Waka mooring	Taioka	Kainga
Taumata-O-Te-Poki	Site	Taita	Pa
Tauponga	Kainga	Taita	Lagoon
Tawa	Kainga	Takupu	Kainga
Te Ahitara	Pa	Taringa Kurahaupo	Occupied location
Te Aotahuna	Kainga	Te Awa Kararoa	Occupied location
Te Apiti	Site	Te Awahou	Kainga
Te Apu	Kainga	Te Awahou	Kainga
Te Au Nui O Tonga	Site	Te Awahou	Kainga
Te Au Rere A Te Tonga	Site	Te Awahuri	Kainga
Te Kairanga	Kainga	Te Horo	Clearing
Te Kairanga	Pa	Te Kahihoe	Occupied location
Te Kairanga	Papa kainga	Te Wi	Papa Kainga
Te Kapa-A-Haka	Kainga	Tiakitahuna	Pa
Te Karaka	Kainga	Tika Na Roa	Site River
Te Karaka	Occupied Location	Whirokino	Kainga

NAME	DESCRIPTION	NAME	DESCRIPTION
Te Karaka	Cultivation	Tikitiki	Kainga
Te Karekare	Pa	Titihuha	Kainga
Te Karihari	Papa Kainga	Toita	Occupied location
Te Kuri Kautete	Kainga	Tokitoki	Kainga
Te Kuripaka	Pa	Tokomaru	Kainga
Te Maire	Kainga	Tuapaka	Kainga
Te Maire	Lagoon	Tuapu	Occupied location
Te Matai	Pa	Turitea	Pa
Te Motu a Poutoa	Pa	Tutunanui Kainga	Kainga
Te Ngaioaroa	Kainga	Tuturima	Kainga
Te Oranga-Tuturu	Kainga	Upoko-poutu	Kainga
Te Paiaka Kainga	Kainga	Waitamata	Kainga
Te Papa Ngaio	Pa	Waiteikai	Occupied location
Te Pehu	Site river	Whakapohepohe	Occupied location
Te Raka	Site	Whakaripa	Kainga
Te Rerenga-o-hau	Kainga	Whakatanguru	Kainga
Te Rewarewa	Area	Whakatero	Kainga
Te Waka Puni	Waka mooring	Whakatero	Kainga
Te Weka	Clearing	Whakatutu	Kainga
Te Weki	Clearing	Whakawaewae	Mound
Te Wharangi	Pa	Whakawehi	Kainga
Wharaoere	Occupied location		

As Rangitāne o Manawatu develop their capacity they look forward to the future and the time when they are fully engaged in upholding the principle of kaitiaki over the Manawatu River.

The entire document can be found at this link (from page 9): [Rangitane o Manawatu Documents Schedule 14 Nov 2015](#)

Rangitāne o Manawatū statutory area over the Mangahao River from the deed of settlement (deed plan OTS-182-24)



Approximate location of Mangahao Hydro Scheme indicated by red triangle.

Rangitāne o Manawatū statement of association regarding the Manawatū River and its tributaries from the deed of settlement

Mangahao River (as shown on deed plan OTS-182-24)

The Mangahao River is significant to Rangitāne o Manawatu both as a natural and spiritual resource. The Mangahao River flows from the central areas, Hanga o hia tangata, in the Tararua Ranges, along the Ranges, past a number of significant peaks such as Mairehau and Ngāwhakaraua connecting many of the rivers that then flow to the west and the east. The Mangahao River valley also provided an important access and route through the Tararua Ranges to the central areas for spiritual purposes and to gather natural resources. European explorations of the Ranges during the 1900's have also uncovered a number of artefacts in the vicinity of this area.

One of the most significant features of the river is the direct connection through the Ranges connecting many streams to carry Mauri from the ranges to the lowland areas below. However, the Mangahao River has been heavily altered and dammed during European settlement for industrial and power generation purposes.

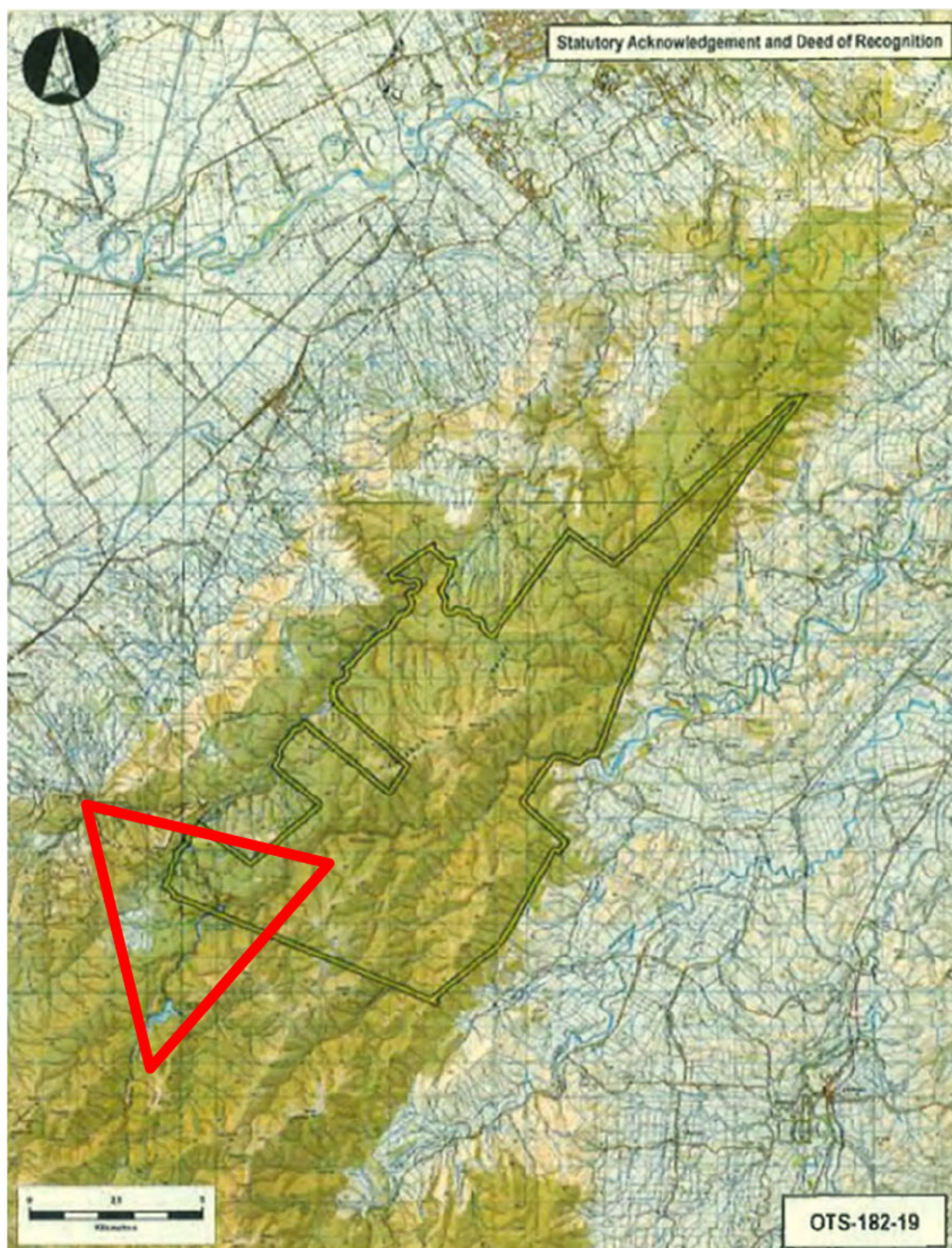
The Mangahao and its distributaries (Tokomaru River and Mangaore Stream) were highly regarded sources of wai and kai and access ways into the Tararua Ranges.

The Mangahao River has been over time referred to as Moawhanga/Moawanga and Mongohao/Mangahao. The former names refer to the booming sound the river made through its course and to the area being a source of Moa that were hunted in the area. Rangitāne (North Island) also refer to the Mangahao as being a source of (pure) water where the, now extinct, native freshwater fish (grayling) Upokororo was found in large numbers and gathered.

As Rangitāne o Manawatu develop their capacity they look forward to the future and the time when they are fully engaged in upholding the principle of kaitiaki over the Mangahao River.

The entire document can be found at this link (from page 9): [Rangitane o Manawatu Documents Schedule 14 Nov 2015](#)

Rangitāne o Manawatū statutory area over the Tararua Forest Park from the deed of settlement (deed plan OTS-182-19)



Approximate location of Mangahao Hydro Scheme indicated by red triangle.

Rangitāne o Manawātū statement of association regarding the Tararua Forest Park from the deed of settlement

Tararua Forest Park (as shown on deed plan OTS-182-19)

*Ko Ruahine me nga Tararua te maunga
Ko Manawatu te awa
Ko Kurahaupo te waka
Ko Rangitāne te iwi*

The Tararua Range holds great historical, cultural, spiritual and traditional significance to Rangitāne o Manawatu, as it is one of two mountain ranges that identify the iwi of Rangitāne.

The Tararua Range was initially created or "fished up" by Maui and carved into its current shape by his brothers. It then became the exposed backbone of the fish of Maui (Te Ika A Maui). For Rangitāne o Manawatu traditions such as this, represent the significant links between the cosmological world and the modern world, which have shaped Rangitāne as an iwi.

The name Tararua was bestowed on the mountain range by the Rangitāne o Manawatu tupuna Whatonga. Whatonga who was a great explorer, travelled to the Manawatu via Waka along the West Coast from the South Island. Following his exploration of the Manawatu, he returned to Heretaunga, to his wife Hotuwaipara, who had bore him a son named Tara. Whatonga named the mountain Range (and twin peaks near Mitre Peak) which dominated the landscape within his rohe, Tararua, after his first born son.

Over time the range developed its own persona and place within Rangitāne o Manawatu cultural and spiritual belief system as a highly significant geomorphological feature in the landscape. The Tararua Range became respected and revered as a significant site and was regarded as a place occupied by past ancestors. These ancestors formed the peaks of the Range and were situated in a position similar to those Rangatira and Kaumatua that sit on the paepae in the front of a Marae. Due to this, parts of the Range were not accessible while other parts were used for spiritual and ritualistic practises.

The name of the Tararua, the tracks located within it, the sources of many rivers which begin there, the great abundant sources of mahinga kai located within it and the various names bestowed on areas within the Tararua, reinforce the tribal identity of Rangitāne o Manawatu and the continuity of Rangitāne o Manawatu through the various generations. They are the living evidence that has shaped Rangitāne o Manawatu as an iwi and bestowed upon them as one of the kaitiaki of the Tararua Range.

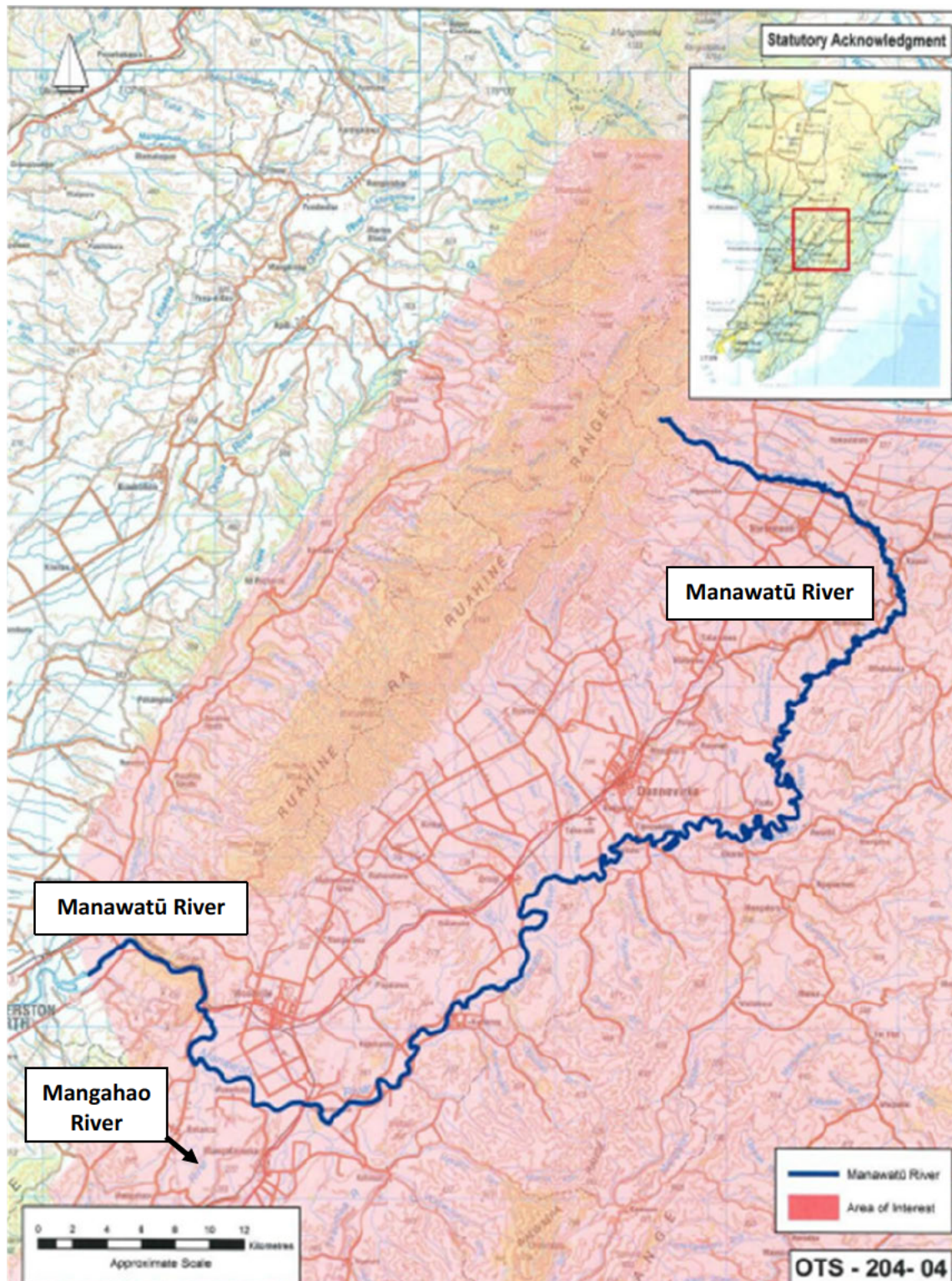
The Tararua mountain range contains many tracks which link Rangitāne o Manawatu with Rangitāne whanaunga who live in Tamaki Nui a Rua and Wairarapa. These include the tracks that lead from Raukawa Pa on the eastern bank of the Manawatu River, to the Wairarapa, whilst another lead from the fortified Pa site of Te Motu a Poutoa (now known as ANZAC Park) by way of what is now known as the Pahiatua-Aokautere Road onto Forty Mile Bush, in the Wairarapa. Near Puketotara, which now links the Te Awe Awe roads on the eastern and western sides of the Tararua Range, was the track known as Kaihinu, named after the Chief of Tuwhakapūa Pa. From Wairarapa there was a track that followed the Kahuterawa Stream which Rangitāne o Wairarapa would use to visit Rangitāne o Manawatu at Kairanga.

Located along the Tararua Range, are significant peaks which Rangitāne o Manawatu would light fires to send signals to their whanaunga in times of battle. One significant part of the Tararua Range (currently the Tararua Forest Park) originally referred to as "Tihi-Pakirakira" became established as an area for crossing the Range and gathering resources, signal fires and small settlements were established and the area was then known as Arawaru. On Arawaru and Te Apati some of the most unique flora in the Manawatu is found.

The entire document can be found at this link (from page 9): [Rangitane o Manawatu Documents Schedule 14 Nov 2015](#)

Attachment 5: Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua statutory acknowledgement and statement of association

Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua statutory area over the Manawatū River and its tributaries from the deed of settlement



Mangahao Hydro Scheme is located in the headwaters of the Mangahao River (out of picture).

Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua statement of association regarding the Manawatū River and its tributaries from the deed of settlement

Manawatū River (with recorded name Manawatu River) and its tributaries within the Rangitāne Area of Interest (as shown on deed plan OTS-204-04)

The Manawatū River has its origins on the western side of the Ruahine Range. Its primary source is north of modern day Dannevirke. The catchment also includes the rivers south of the gorge which stretch all the way back to Pukaha / Mount Bruce. They include Bruce Stream, Makakahi, Mangatainoka, Tiraumea and Mangahao rivers. All of these waters converge and enter Te Āpiti (the Manawatū Gorge) and flow on through the Manawatū plains and out to sea at Foxton Beach. For Rangitāne o Tamaki nui-ā-Rua, the Manawatū River is an ancestral waterway, which many hapū refer to as the awa in their pepeha. When the Tamaki nui-ā-Rua was covered in forest, the river served as a highway for Rangitāne. It was an important means of travel and communication, and linked the Rangitāne settlements in forest clearings. Rangitāne had many settlements along the River, which provided fresh water and plentiful kai.

The original ancestor linked with the Manawatū River was Tamakuku, who dug out the bed of the river, and exercised mana on both sides of the river for its full length. Rangitāne's grandfather, Whātonga, journeyed up the Manawatū River whilst on a trip away from Heretaunga. Whātonga's second wife, Reretua, was the grand-daughter of Tamakuku. The links between Rangitāne and Tamakuku were further cemented when Hinetakutai, the daughter of Rangitāne, married Te Rahekeua, a descendant of Tamakuku. All of Rangitāne o Wairarapa and Rangitāne o Tamaki nui-ā-Rua therefore share descent from Tamakuku, and the link to the Manawatū River.

According to Rangitāne the southern part of the river was formed by the efforts of a giant tōtara tree which grew on the Puketoi Range. The tree became possessed with a spirit called Okatia, which desired to get to the sea. When it descended the Puketoi Range, it headed west and thus encountered the formidable Tararua/Ruahine Range. The constant pounding of the giant tree, assisted by the force of the waters of the Manawatū fractured the range, separating the Ruahine and Tararua Ranges and forming the Manawatū Gorge. Rangitāne use the term Te Āpiti when referring to the cleft that Okatia created in the gorge. Where the river flows through the gorge it is referred to as 'Te Au-rere-a-te-tonga' meaning the flowing current of the south. Other names used by Rangitāne when referring to the Manawatū Gorge area are Te Ahu a Turanga-i-mua and Te waha o te kurī.

The Manawatū River was named by the tupuna Haunui a Nanaia. He travelled along the west coast of the lower North Island, pursuing his wife. When he came to the Manawatū river mouth, he stood aghast as he contemplated the crossing, hence *Manawa-breath* and *tū- to stand still*. Some say that his breath stood still as he was actually crossing the river, not only because of the width and depth of the river, but because of the intense cold; it made his breath stand still hence Manawatū.

Rangitāne know of many taniwha and kaitiaki along the course of the river. One of these is Peketahi, the kaitiaki in the bend of the river near the Kaitoki Bridge east of Dannevirke. Peketahi appears in the form of crayfish with a missing limb, an eel or a log. In times of flood Peketahi is often seen as a floating log as he keeps watch on the kāinga.

The entire document can be found at this link (from page 8): [Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua - Documents - Signing version 6 August 2016](#)

Attachment 6: Comments received from Tānenuiārangi Manawatū Charitable Trust

Attachment 7: Comments received from Muaūpoko Tribal Trust



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24 August 2026

Tēnā koutou,

Regarding: Rangitāne o Manawatū Comments on the Referral Application under the Fast Track Approvals Act 2024.

Statement of position

Rangitāne o Manawatū (ROM) through their environmental arm Te Ao Turoa Environmental Centre (TATEC) **do not support** the application by King Country Energy (Contact Energy) to refer the Mangahao Hydro-Electric Power Scheme (HEPS) for consideration under the Fast Track Approvals Act 2024.

RoM's position is that the application should be declined at the referral stage for the following reasons:

- The scheme is the oldest major hydroelectric scheme in NZ, opened in 1924, meaning that it was developed when understanding of the profound impacts of hydroelectric schemes on freshwater ecosystems was in its infancy (and impacts on iwi values not considered at all). Renewal/s have done very little to change this.
- The Applicant has entered into the Fast-Track process to avoid "flow restrictions" and "complex conditions" typically imposed under the RMA. This frames standard environmental protections as potential causes of "significant loss of energy production". Approving the referral on the basis that it would enable environmental conditions would be to pre-determine those issues.
- The Applicant seeks 35-year consents to maintain the current operational regime without committing to sufficient effects management measures in the Mangahao, Tokomaru and Mangaore Rivers.

Our status as a likely affected party under the FTAA

We consider ourselves affected by the project.

We are a relevant iwi authority under section 13(4)(j) of the Fast Track Approvals Act 2024.

Our association with the project area

RoM has the following associations, interests, values and taonga within the project area:



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Our association with the environment

- RoM has a longstanding cultural, spiritual, historical, and traditional relationship with the lands and waters of the Manawatū. Our customary rohe extends from the Tararua and Ruahine ranges across the Manawatū to the west coast, with the Manawatū Awa and its tributaries, forming an integral part of our identity, history, and relationship with the environment.
- RoM holds recognised cultural, spiritual, historical, and traditional associations with the Tararua Forest Park, the Mangahao Awa, the Manawatū Awa and its tributaries, including the Mangaore Stream and Tokomaru Awa. These associations are formally recognised through the RoM Deed of Settlement and Historical Claims (DOS-HC) (2016).
- Mātauranga-a-Rangitāne is founded on the understanding that all elements of the environment are interconnected. RoM therefore considers the health and wellbeing of waterways, their tributaries, groundwater, wetlands, and receiving environments as part of an interconnected whole. Our relationship with these environments carries an obligation to protect, enhance, and restore their mauri for current and future generations.

Wāhi tapu, wāhi tupuna, and taonga environments

- RoM has a longstanding cultural, spiritual, historical, and traditional association with the freshwater environments encompassing the Mangahao HEPS. The importance of these environments to RoM is formally recognised through the RoM DOS-HC, including statutory acknowledgements over the Mangahao Awa, Manawatū Awa and its tributaries and Tararua Forest Park.
- The Mangahao Awa, Tokomaru Awa, Mangaore Stream and associated freshwater environments are understood as part of an interconnected cultural landscape. For RoM, waterways, their tributaries, wetlands, groundwater, indigenous biodiversity, and surrounding whenua are not considered in isolation from one another. Collectively, these environments support mauri, cultural practices, mahinga kai, mātauranga, and the exercise of kaitiakitanga.
- RoM therefore considers the protection of wāhi tapu, wāhi tupuna, and taonga environments to extend beyond the protection of individual identified sites. It also requires recognition of the relationships and connections between wai, whenua, indigenous biodiversity, and the wider cultural landscape, and the ability of RoM to maintain its relationship with and exercise kaitiakitanga over these environments.

Taonga species



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Taonga species present in the scheme's catchments include long-finned eel (tuna), short fin eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, torrent fish, dwarf galaxiid, bullies, and lamprey. Historically, the waters supported Ūpokororo (grayling).

Existing dam structures eliminate fish passage to upper reaches, while artificial flow fluctuations, dry riverbeds, inter-catchment water transfers, and sediment sluicing degrade downstream habitats and cause fish injury and mortality.

Core Rangitāne o Manawatū values relevant to the project

- **Mauri** is the life-supporting essence that binds together the physical, spiritual and cultural elements of the natural world. RoM considers the protection and restoration of mauri to be fundamental to freshwater management. The health and wellbeing of RoM is inseparable from the health and wellbeing of wai. Maintaining the mauri of the Mangahao Awa, Tokomaru Awa, Mangaore Stream, and ultimately the Manawatū Awa requires the protection of natural ecological processes, healthy aquatic habitats, indigenous biodiversity and the ability of the river to sustain life.
- **Kaitiakitanga** describes our obligation to protect the physical, ecological, and spiritual health of our ancestral land and water as we have inherited responsibilities as kaitiaki of the natural environment. The exercise of kaitiakitanga requires meaningful involvement in environmental management and decision-making processes affecting ancestral lands and waters.
- **Mana whakahaere and tino rangatiratanga** encompass our inherent right to govern, manage, and hold decision-making authority over our ancestral resources. Leaving flow and operational decisions entirely to technical experts bypasses RoM rangatiratanga.
- **Interconnectedness of wai** recognises water as an interconnected whole. Freshwater management must recognise the connections between headwaters, rivers, tributaries, wetlands, groundwater, estuaries and receiving environments. Effects occurring in one part of a catchment may influence the health and wellbeing of connected environments and therefore must be considered holistically.
- **Mātauranga and Intergenerational Responsibility** recognises the protection and transmission of mātauranga, tikanga and cultural practices associated with freshwater environments. The ability of future generations to maintain relationships with waterways, undertake customary practices and exercise kaitiakitanga is an important consideration when assessing environmental effects.

Māori Land, marae and identified wāhi tapu within the project area

Section 13(4)(o) states a referral application must include information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area.



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There are no parcels of Māori land, and no RoM marae in the area.

There are a number of wāhi tapu surrounding the Mangahao HEPS site. The applicant has not asked us for this information to include in their application. This information is contained in our private iwi database and will be included in our Cultural Impact Assessment.

Consultation or notification by the Applicant

The applicant has notified RoM in writing about their intent to make a referral application for the scheme.

The nature of engagement to date has also included:

- We were procured to undertake a CIA in October 2024. However, we have not been able to progress this mahi because we lack information to understand how the scheme operates. We had a short series of hui around July 2025 to discuss the consenting programme and some fish data that had been collected.
- We have undertaken a site visit in late 2025.
- We recently held a workshop on 14th August 2026, where the project team presented information on effects on ecology and sediment.

Our role if the referral application is accepted

RoM have the status of a relevant iwi authority and intends to respond to the invitation to comment under s 53 of the Act, if the application is accepted for processing as a substantive application.

The referral application should be declined under section 21(3) or (4)

We consider that the Minister should decline the referral application for the following reason(s):

- the project may have significant adverse effects on the environment.

Our justification for this is as follows:

The project will have significant adverse effects on the environment



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Based on the information provided in the referral application, RoM consider that the Mangahao HEPS will have significant actual or potential adverse effects. Under RMA case law, significant adverse effects are those that carry a serious, noticeable environmental impact; the scheme's current unmitigated baseline operation inflicts continuous, high-level adverse impacts on the awa, ecosystems, and RoM cultural well-being.

Cultural and spiritual effects

- Taking water from the Mangahao and Tokomaru catchments and transferring it across catchment boundaries into Mangaore Stream severs ki uta ki tai pathways, disrupts mauri and breaches our tikanga. Mana whenua involvement and regenerative actions are the only way to manage these effects; this is not currently included in proposals.
- Decisions on water allocation, flow regimes, and river management may continue to be made exclusively by Western technical experts and regulators, without recognition of RoM decision-making authority, our tikanga and our mātauranga. This would suppress our tino rangatiratanga and mana whakahaere.
- Access to key traditional areas and wāhi tapu is restricted.

Effects on ecology

- Effects on ecology are also cultural effects.
- The existing dams on the Mangahao HEPS obstruct the upstream and downstream passage of taonga species, including long-finned eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, and torrent fish.
- The scheme extracts all available water in sections of the mid Mangahao and upper Tokomaru Rivers, leaving no residual flow. Correspondence with the applicant (July 2026) confirms that:
 - Downstream of No.2 Dam (Mangahao River), there is currently no residual flow, as required by consent. Flow relies on spill gate mechanisms and leakage.
 - Below No.3 Dam (Tokomaru River), the channel is dry for ~300 m before the tributaries provides small regenerating flow. The highly polluted downstream environment receives significantly less water, resulting in contaminant concentration buildups.

This large-scale take has degraded and destroyed instream aquatic habitats.

- Temporary coffer dams and instream desilting disturbance in No. 1 Reservoir (on Crown/DOC land) regularly disrupt benthic habitats and water quality. Correspondence with the applicant (July 2026) confirms:
 - Sediment management operations cause "sharp oxygen drops, and deposition of large quantities of sediment" downstream.
 - Water clarity downstream of dams consistently fails to meet Horizons One Plan targets.



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- Stream macroinvertebrate communities are severely depleted downstream of the Mangahao dams.
- The scheme creates large flow fluctuations in downstream habitats. Significant and rapid flow variations and tailrace discharges into the Mangaore Stream disrupt habitat stability and health.

Natural and physical resources of special value

- Water quality and riparian margins of rivers within the Tararua Ranges are extremely high quality and pristine, compared to the wide-scale degradation of the Manawatū catchment.

Discharge of contaminants (sediment)

- Dam infrastructure traps sediment, depriving downstream reaches of beneficial sediment transport. Periodic sluicing releases heavy sediment loads, causing widespread silt buildup, deoxygenates water, and makes downstream habitats uninhabitable for ika and other aquatic species.
- Altered flow regimes cause bank instability and gravel erosion downstream of the power station tailrace in the Mangaore Stream.

Landscape effects

- Hydropower infrastructure (dams, penstocks, surge chambers) has altered the natural character of the Tararua Ranges, including our sites of significance (our awa, our experiences from our significant mountain peaks, our traditional pathways and access to these places). They have significantly altered the natural landscape compared with what our tīpuna knew and what is contained within our mātauranga passed down over generations.

The Applicant's description of effects

The Applicant's assessment of effects in the referral application has gaps that we believe undermine its completeness, namely:

- An inaccurate baseline approach
- Incorrect framing of environmental mitigations as a burden
- The minimisation of cultural impacts
- Unaddressed data gaps



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The Applicant states that because no operational changes are proposed, "no material change in environmental effects is expected" (Attachments 7 and 8 of the referral application). This argument treats 100+ years of unmitigated environmental degradation (zero residual flows, total fish migration blockages) as an acceptable baseline, which is inappropriate to RoM. Expecting "no material change" simply means locking in continuous, significant adverse impacts on the awa and our taonga species.

In Attachment 7, the Applicant criticises standard RMA processes for introducing flow restrictions that result in a "loss of energy production" and "more complex conditions". This frames essential river management as negative process costs rather than necessary ecological and cultural requirements. The effects of the Mangahao HEPS, while they have existed since the 1920s, have not been rigorously assessed against the mātauranga and scientific knowledge we hold today. The allowance of adverse effects under the historical consent does not necessarily mean they are appropriate or exempt from review.

The Applicant reduces cultural effects to high-level references regarding "fish passage and loss of mauri" (Attachment 7). They record their engagement with iwi and hapū to date, but do not acknowledge the lack of technical information we have had to inform our CIA. This limits our ability to assess how the project will affect tino rangatiratanga, mana whakahaere, kaitiakitanga, intergenerational knowledge transfer, and broader catchment health ki uta ki tai. It also means we cannot provide targeted recommendations. We have put forward our views, based on high-level information received to date, about effects and the need to undertake restoration and fish passage offsetting, involving mana whenua, alongside in-scheme mitigations, but have not had any success in progressing these effects management approaches.

The Applicant acknowledges that technical assessments for aquatic ecology/fish passage (Ryder Consulting) and sedimentation (Tonkin & Taylor) are incomplete or high-level summaries, while iwi CIAs are still in progress. We have not received any drafts of the technical assessments. We note that completing a CIA without technical assessments would not be appropriate. Seeking fast-track referral before these baseline studies and cultural assessments are understood is premature.

Does the project meet the criteria in section 22 for consideration under the Fast-track Approvals Act 2024?

RoM disagrees that the project meets the overall intent of Section 22 for referral to the fast-track process.

While we acknowledge that the scheme provides electricity generation, we disagree that economic or energy benefits justify bypassing standard environmental scrutiny (RMA), fundamental freshwater restoration requirements, and cultural obligations.



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We also disagree that using the fast-track process to accelerate consenting is appropriate for the Mangahao HEPS project. In their application, the Applicant seeks the fast-track pathway to avoid "flow restrictions" and "complex conditions" imposed under standard RMA processes. They frame essential environmental mitigations as an unacceptable "loss of energy production". Facilitating a project by truncating environmental and cultural safeguards at the referral stage imposes an unmitigated burden on the awa and RoM values.

Topic	Applicant view	RoM view
Priority project	The Applicant relies on the policy document Electrify NZ and policies in the Horizons One Plan to argue priority status (Attachments 7 and 8).	Disagree. The Mangahao HEPS has not been specifically identified as a priority project on a central government infrastructure priority list or spatial strategy. Generic policy support for renewable energy under Electrify NZ does not override the statutory necessity under the NPS-FM and Te Tiriti o Waitangi to protect freshwater health, taonga species, and tangata whenua rights.
Continued functioning of existing regionally or nationally significant infrastructure	The scheme generates up to 39.9 MW with an annual output of ~131 GWh, meeting peak demand in the Horowhenua region.	Neutral RoM acknowledges that the physical asset exists and contributes to regional electricity supply. However, the "continued functioning" of existing infrastructure cannot be used as a justification to re-consent zero residual flows and permanent fish migration barriers for a further 35 years without restoration commitments that rectify the breach in tikanga. We have not had any success in developing or progressing these outcomes with King Country Energy.
Delivery of significant economic benefits	The Applicant defines economic benefits primarily as avoiding \$2M–\$4M in RMA-based consenting/hearing costs and avoiding lost generation output that	Disagree. Avoiding necessary expenditure on river health, residual flows, and fish passage transfers costs onto the awa and RoM. It is not a public economic benefit.



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Topic	Applicant view	RoM view
	might occur under RMA river restoration requirements.	
Support for climate change mitigation	The scheme supports climate change mitigation by generating renewable energy and reducing greenhouse gas emissions by approximately 67,830 tCO ₂ -e (gas equivalent).	Neutral. RoM supports decarbonisation and climate change mitigation. However, climate change mitigation should not come at the expense of healthy freshwater ecosystems and taonga species. That is maladaptive. Climate change mitigation and freshwater health are entwined and should not be traded off. In addition, there has been no assessment of alternatives to the firming power that this station provides over the next 30 years compared to batteries combined with wind/solar, when prices for these alternatives have dropped dramatically so that they have become, according to the IEA, the cheapest power in history. https://lowcarbonenergy.co/news/solar-is-now-the-cheapest-form-of-energy-in-history-says-ia/ Nor has the impact of climate change on reservoir water levels over the next 30 years been assessed. See below.
Addressing significant environmental issues	The Applicant states that the scheme will not cause any "material change in environmental effects" (Attachment 7) and claims it addresses environmental issues through greenhouse gas reduction (s2.6.1.11).	Disagree. The scheme itself creates unmitigated environmental issues. Although there will be no <i>change</i> in environmental effects, there are a number of significant existing unmanaged effects that physically and biologically impact the HEPS catchment and culturally impact RoM.



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Topic	Applicant view	RoM view
Consistency with local or regional planning documents	The Applicant states the project is consistent with the Horizons Regional Policy Statement and Regional Plan as existing significant infrastructure.	Conditionally agree. RoM acknowledges that hydroelectricity generation is enabled in the Horizons One Plan. However, the scheme's current unmitigated effects conflicts with direction set by the NPS-FM and matters of control under the One Plan, which prioritises the health and well-being of waterbodies and freshwater ecosystems. We believe the application has not struck the right balance between providing for commercial and environmental values.

Anticipated and known adverse effects of the project on the environment, and the significance of those effects

We have reviewed the Applicant's description of the anticipated and known adverse effects of the project, and the significance of those effects.

Based on the information provided in the referral application, RoM disagree with the Applicant's description of those effects.

The Applicant's summary in Attachment Seven characterises environmental and hydrological impacts as having "no material change" and limits cultural effects to high-level, generalised concerns. This assessment significantly understates the severity of the scheme's impacts on the freshwater environment and RoM values.

We highlight the following areas of concern. If the application is referred, these topics will be contentious during the substantive stage:

- **Hydrology and minimum flows:**
The Applicant seeks to continue taking 100% of the water in upper river sections of the Tokomaru, and middle sections of the Mangahao, without establishing residual flows. RoM maintains that zero residual flow is ecologically and culturally unacceptable.
- **Freshwater ecology and fish passage:**



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Dry riverbeds result in total loss of habitat values and permanent dam structures obstruct the migration of taonga species (tuna, kōkopu, kōaro, torrent fish). Relying on basic "catch and release" measures is insufficient to address the scheme's full impact on habitat and migration.

- **Sedimentation and river dynamics:**

Dams trap sediment and periodic sluicing releases heavy sediment loads, altering riverbed geomorphology, deoxygenating waterways and smothering downstream aquatic habitats. The Mangaore is subject to erosive flows during discharges from the scheme. Significant work is needed to manage these effects and there must be the opportunity for our experts to feed into this mahi during a robust evidence, conferencing and hearing process.

- **Mauri and ki uta ki tai:**

Inter-catchment water transfers disrupt the natural flow of mauri through the awa. Taking from the awa requires us as kaitiaki to give back to the awa. There are no governance or kaitiaki arrangements proposed to date.

RoM understands that the substantive effects of the project will be fully evaluated if the referral application is approved. Should the Minister decide to refer the application despite our opposition, we will seek consent conditions that explicitly avoid, remedy, or mitigate these effects through mandatory minimum flows, ecological restoration initiatives, fish passage remedy or offset approaches, enduring access to sacred sites, and a co-governance/kaitiaki monitoring framework.

Under the Fast-track process, decision-making panels must have the appropriate technical and cultural expertise to comprehensively assess the merits and impacts of a project. The Mangahao HEPS is a technically complex project, and we have several concerns with the scheme in its current form. As such, we request that the appointed decision-making panel for this project include independent experts in the following areas:

- Mātauranga Māori, tikanga, and cultural health monitoring.
- Freshwater ecology and fish passage management.
- Hydrogeology and sediment dynamics.

Other matters - How the project will be affected by climate change and natural hazards

RoM is concerned that the project will potentially be affected by climate change and natural hazards.

We disagree with the Applicant's assessment that climate change "is not anticipated to have any material impact on the way in which the scheme operates" (Attachment 8).



*Ka kahutia i te korowai, Te Rangimarie, Te Aroha, Te Whakaiti, Ka Whakapuawai he iwi humaarie
Spread the cloak of Peace and Love, so shall blossom the people of humility*



**Te Mauri o Rangitāne o Manawatū (Council of Elders)
Tānenuiārangi Manawatū Charitable Trust Rōpu**

Part of the Rangitāne Nation

Phone: (06) 353 6385

**Te Hotu Manawa o Rangitāne o Manawatū Marae
Best Care (Whakapai Hauora) Charitable Trust
Te Ao Turoa Environmental Centre
Kahuku Enterprises
Kia Ora FM 89.8**

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The Applicant's hydrological assessment (Tonkin & Taylor) acknowledges that climate change may reduce mean summer/autumn flows, increase winter mean flows, increase low-flow event frequency and duration, and increase peak flood discharges. However, the Applicant fails to recognise that continuing to operate under a 35-year unmitigated extraction regime while climate conditions shift will compound existing environmental and cultural damage across the catchment. Although climate change may not have a material impact on the scheme "at this stage", a long-term view is needed.

Our specific climate change and hazard concerns include:

- Reduced summer and autumn rainfall paired with the scheme's zero residual flow will further degrade habitats.
- Warmer water temperatures and prolonged low flows will increase toxic cyanobacteria/algal blooms, oxygen depletion, and impacts on taonga species.
- Higher-intensity and more frequent rain events will change flood flow behaviour and impacts (including scouring and bank instability).
- Seismic and landslide risks that arise from the geologically active landscape and ageing infrastructure.

Climate change impacts demonstrate why locking in a 35-year consent duration with no operational changes or minimum flow provisions is ecologically and culturally irresponsible. Should the application proceed, RoM seeks consent conditions that require:

- Adaptive flow management regimes that adjust water abstraction limits based on real-time climate, temperature, and ecological health indicators.
- Comprehensive dam safety, sediment flushing, and flood management plans developed in active partnership with RoM as kaitiaki.

Heoi anō rā

Danielle Harris, O.N.Z.M, LLB, PGDipBusAdmin

Tumuaki - Chief Executive Office



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17 August 2026

Tēnā koutou

Regarding: Muaūpoko Tribal Authority Comments on the Referral Application under the Fast Track Approvals Act 2024.

Statement of position

Muaūpoko Tribal Authority (MTA) **do not support** the application by King Country Energy (Contact Energy) to refer the Mangahao Hydropower Scheme for consideration under the Fast Track Approvals Act 2024.

MTA's position is that the application should be declined at the referral stage for the following reasons:

- The scheme is the oldest major hydroelectric scheme in NZ, opened in 1924, meaning that it was developed when understanding of the profound impacts of hydroelectric schemes on freshwater ecosystems was in its infancy (and impacts on iwi values not considered at all). Renewal/s have done very little to change this.
- The Applicant has entered into the Fast-Track process to avoid "flow restrictions" and "complex conditions" typically imposed under the RMA. This frames standard environmental protections as potential causes of "significant loss of energy production".¹ Approving the referral on the basis that it would enable environmental conditions would be to pre-determine those issues.
- The Applicant seeks 35-year consents to maintain the current operational regime without committing to sufficient effects management measures in the Mangahao, Tokomaru and Mangaore Rivers.

Our status as a likely affected party under the FTAA

We consider ourselves affected by the project.

¹ Section 2.6 of Attachment 7 of the Referral application (the appropriateness for Fast Track Appr

We are a relevant iwi authority under section 13(4)(j) of the Fast Track Approvals Act 2024.

Our association with the project area

MTA has the following associations, interests, values and taonga within the project area:

Our association with the environment

- Muaūpoko holds ancestral rights (tangata whenua) across Te Ūpoko o te Ika, spanning from the Rangitikei River to Turakirae (Cape Palliser), with Horowhenua as the ancestral heartland. MTA is the mandated iwi authority for RMA purposes, Treaty settlement negotiations, the Māori Fisheries Act 2004, and the Māori Commercial Aquaculture Claims Settlement Act 2004.
- Muaūpoko land owners hold statutory fishery rights preserved under Section 18 of the Reserves and Other Lands Disposal Act 1956 (ROLDA) for Punahau and Hōkioi. Access to upper Tararua fisheries (such as Ūpokororo) was explicitly recognised under the Horowhenua Block Act 1896 (Tararua Block / Block 12), which is within and adjacent to the project area.
- Muaūpoko mātauranga recognises the naming and traditional use of the Tararua Range, the project awa (Mangahao, Tokomaru, Mangaore, Arapeti), and groundwaters.

Wāhi tapu, wāhi tupuna, and taonga environments

- The Tararua Ranges are a sacred mountain range (ko Tararua ngā pae maunga) containing ancient tracks, mahinga kai, and sanctuaries our tīpuna used.
- The Mangahao River, Tokomaru River, Mangaore Stream, and Arapeti Stream are ancestral waterways whose natural flows, sediment processes, and ecology have been fundamentally altered by the scheme.
- Tāwhirikohokohu (spring) is a sacred waterbody that has immense cultural, spiritual and ancient wairua associations.
- Maunga Puke Toa (peak), Maunga Harakeke (peak), Te Paki (peak) and Ngapuketurua (peak) are significant mountains within the ranges within and adjacent to the scheme. They are linked to our tracks and mahinga kai. They are named for our ancestors and their traditional uses.

Taonga species

Taonga species present in the scheme's catchments include long-finned eel (tuna), short fin eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, torrent fish, dwarf galaxiid, bullies, and lamprey. Historically, the waters supported Ūpokororo (grayling).

Existing dam structures eliminate fish passage to upper reaches, while artificial flow fluctuations, inter-catchment water transfers, and sediment sluicing degrade downstream habitats and cause fish injury and mortality.

Core Muaūpoko values relevant to the project

- **Manaakitia te mauri o te taiao** recognises that water is life-sustaining. Taking all water, leaving no residual flow in parts of the Mangahao and Tokomaru Awa, and transferring water across catchments severs the natural flow of water and its mauri. It breaches our tikanga and actions are required to restore and give back to these waterbodies and our taonga species.
- **Kaitiakitanga** describes our obligation to protect the physical, ecological, and spiritual health of our ancestral maunga and water. Exercising kaitiakitanga requires real-time data access, cultural health monitoring, and active involvement in resource management and operational decisions.
- **Mana whakahaere and tino rangatiratanga** encompass our inherent right to be involved in governance, management, and implementation of resource management related to our ancestral taonga.
- **Te Kete Aranui** describes the need to rebuild iwi access and transfer mātauranga about the scheme environment to rangatahi and whānau over long consent durations.

Māori Land, marae and identified wāhi tapu within the project area

Section 13(4)(o) states a referral application must include information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area.

There are no parcels of Māori land, and no Muaūpoko marae in the scheme area.

The project area includes the following identified wāhi tapu (discussed above).

- Arapeti (awa)
- Tokomaru Awa (awa)
- Tarawhitikohokohu (lake)
- Maunga Puke Toa (peak)
- Maunga Harakeke (peak)
- Te Paki (peak)
- Ngapuketurua (peak)

The Applicant has not asked us for this information to include in their application. This information is contained in our private iwi database and will be included in our Cultural Impact Assessment.



Figure 1 Map showing Muaūpoko wāhi tapu relative to the project area

Consultation or notification by the Applicant

The applicant (King Country Energy) has notified MTA in writing about their intent to make a referral application for the scheme.

The nature of engagement to date has also included:

We were procured to undertake a CIA in July 2025. However, we have not been able to progress this mahi because we lack information to understand how the scheme operates. We had a short series of hui around July 2025 to discuss the consenting programme and some fish data that had been collected.

We have undertaken a site visit in late 2025.

We have had some communication over the phone in the interim period.

We recently held a workshop on 14th August 2026, where the project team presented information on effects on ecology and sediment.

Our role if the referral application is accepted

MTA have the status of a relevant iwi authority and intends to respond to the invitation to comment under s 53 of the Act, if the application is accepted for processing as a substantive application.

The referral application should be declined under section 21(3) or (4)

We consider that the Minister should decline the referral application for the following reason(s):

- the project may have significant adverse effects on the environment;

Our justification for this is as follows:

The project will have significant adverse effects on the environment

Based on the information provided in the referral application and our understanding of the scheme today, MTA consider that the Mangahao Hydro-Electric Power Scheme will have significant actual or potential adverse effects. Under RMA case law, significant adverse effects are those that carry a serious, noticeable environmental impact; the scheme's current unmitigated baseline operation inflicts continuous, high-level adverse impacts on the awa, ecosystems, and Muaūpoko cultural well-being.

Cultural and spiritual effects

- Taking water from the Mangahao and Tokomaru catchments and transferring it across catchment boundaries into Mangaore Stream severs ki uta ki tai pathways, disrupts mauri and breaches our tikanga. Mana whenua involvement and regenerative actions are the only way to manage these effects, this is not currently included in proposals.
- Decisions on water allocation, flow regimes, and river management may continue to be made exclusively by Western technical experts and regulators, without recognition of MTA decision-making authority, our tikanga and our mātauranga. This would suppress our tino rangatiratanga and mana whakahaere.
- Access to our key traditional areas and wāhi tapu is restricted.

Effects on ecology

- Effects on ecology are also cultural effects.
- The existing dams on the Mangahao HEPS obstruct the upstream and downstream passage of taonga species, including long-finned eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, and torrent fish.
- The scheme extracts all available water in sections of the mid Mangahao and upper Tokomaru Rivers, leaving no residual flow. Correspondence with the applicant (July 2026) confirms that:
 - o Downstream of No.2 Dam (Mangahao River), there is currently no residual flow, as required by consent. Flow relies on spill gate mechanisms and leakage.
 - o Below No.3 Dam (Tokomaru River), the channel is dry for ~300 m before the tributaries provides small regenerating flow. The highly polluted downstream environment receives significantly less water, resulting in contaminant concentration buildups.

This large-scale take has degraded and destroyed instream aquatic habitats.

- Temporary coffer dams and instream desilting disturbance in No. 1 Reservoir (on Crown/DOC land) regularly disrupt benthic habitats and water quality. Correspondence with the applicant (July 2026) confirms:
 - o Sediment management operations cause "sharp oxygen drops, and deposition of large quantities of sediment" downstream.
 - o Water clarity downstream of dams consistently fails to meet Horizons One Plan targets.
 - o Stream macroinvertebrate communities are severely depleted downstream of the Mangahao dams.
- The scheme creates large flow fluctuations in downstream habitats. Significant and rapid flow variations and tailrace discharges into the Mangaore Stream disrupt habitat stability and health.

Natural and physical resources of special value

- Water quality and riparian margins of rivers within the Taranaki Ranges are extremely high quality and pristine, compared to the wide-scale degradation of the Manawatū catchment.

Discharge of contaminants (sediment)

- Dam infrastructure traps sediment, depriving downstream reaches of beneficial sediment transport. Periodic sluicing releases heavy sediment loads, causing widespread silt buildup, deoxygenates water, and makes downstream habitats uninhabitable for ika and other aquatic species.
- Altered flow regimes cause bank instability and gravel erosion downstream of the power station tailrace in the Mangaore Stream.

Landscape effects

- Hydropower infrastructure (dams, penstocks, surge chambers) has altered the natural character of the Taranaki Ranges, including our sites of significance (our

awa, our experiences from our significant mountain peaks, our traditional pathways and access to these places). They have significantly altered the natural landscape compared with what our tīpuna knew and what is contained within our mātauranga passed down over generations.

The Applicant's description of effects

The Applicant's assessment of effects in the referral application has gaps that we believe undermine its completeness, namely:

- An inaccurate existing environment approach
- Incorrect framing of environmental mitigations as a burden
- The minimisation of cultural impacts
- Unaddressed data gaps

The Applicant states that because no operational changes are proposed, "no material change in environmental effects is expected" (Attachments 7 and 8 of the referral application). This argument treats 100+ years of unmitigated environmental degradation (zero residual flows, total fish migration blockages) as an acceptable baseline, which is inappropriate to MTA. Expecting "no material change" simply means locking in continuous, significant adverse impacts on the awa and our taonga species.

In Attachment 7, the Applicant criticises standard RMA processes for introducing flow restrictions that result in a "loss of energy production" and "more complex conditions". This frames essential river management as negative process costs rather than necessary ecological and cultural requirements. The effects of the Mangahao HEPS, while they have existed since the 1920s, have not been rigorously assessed against the mātauranga and scientific knowledge we hold today. The allowance of adverse effects under the historical consent does not necessarily mean they are appropriate or exempt from review.

The Applicant reduces cultural effects to high-level references regarding "fish passage and loss of mauri" (Attachment 7). They record their engagement with iwi and hapū to date, but do not acknowledge the lack of technical information we have had to inform our CIA. This limits our ability to assess how the project will affect tino rangatiratanga, mana whakahaere, kaitiakitanga, intergenerational knowledge transfer, and broader catchment health ki uta ki tai. It also means we cannot provide targeted recommendations. We have put forward our views, based on high-level information received to date, about effects and the need to undertake restoration and fish passage offsetting, involving mana whenua, alongside in-scheme mitigations, but have not had any success in progressing these effects management approaches.

The Applicant acknowledges that technical assessments for aquatic ecology/fish passage (Ryder Consulting) and sedimentation (Tonkin & Taylor) are incomplete or high-level summaries, while iwi CIAs are still in progress. We have not received any drafts of the technical assessments. We note that completing a CIA without technical assessments would not be appropriate. Seeking fast-track referral before these baseline studies and cultural assessments are understood is premature.

Does the project meet the criteria in section 22 for consideration under the Fast-track Approvals Act 2024?

MTA **disagrees** that the project meets the overall intent of Section 22 for referral to the fast-track process.

While we acknowledge that the scheme provides electricity generation, we disagree that economic or energy benefits justify bypassing standard environmental scrutiny (RMA), fundamental freshwater flow management requirements, and cultural obligations.

We also disagree that using the fast-track process to accelerate consenting is appropriate for the Mangahao HEPS project. In the application, the Applicant seeks the fast-track pathway to avoid "flow restrictions" and "complex conditions" imposed under standard RMA processes. They frame essential environmental mitigations as an unacceptable "loss of energy production". Facilitating a project by truncating environmental and cultural safeguards at the referral stage imposes an unmitigated burden on the awa and Muaūpoko.

Topic	Applicant view	MTA view
Priority project	The Applicant relies on the policy document Electrify NZ and policies in the Horizons One Plan to argue priority status (Attachments 7 and 8).	Disagree. The Mangahao HEPS has not been specifically identified as a priority project on a central government infrastructure priority list or spatial strategy. Generic policy support for renewable energy under Electrify NZ does not override the statutory necessity under the NPS-FM and Te Tiriti o Waitangi to protect freshwater health, taonga species, and tangata whenua rights.
Continued functioning of existing regionally or nationally significant infrastructure	The scheme generates up to 39.9 MW with an annual output of ~131 GWh, meeting peak demand in the Horowhenua region.	Neutral MTA acknowledges that the physical asset exists and contributes to regional electricity supply. However, the "continued functioning" of existing infrastructure cannot be used as a justification to re-consent zero residual flows and permanent fish migration barriers for a further 35 years without restoration commitments that rectify the breach in tikanga. We have not had any success in developing or

		progressing these outcomes with King Country Energy.
Delivery of significant economic benefits	The Applicant defines economic benefits primarily as avoiding \$2M–\$4M in RMA-based consenting/hearing costs and avoiding lost generation output that might occur under RMA river restoration requirements.	Disagree. Avoiding necessary expenditure on river health, residual flows, and fish passage transfers costs onto the awa and Muaūpoko. It is not a public economic benefit.
Support for climate change mitigation	The scheme supports climate change mitigation by generating renewable energy and reducing greenhouse gas emissions by approximately 67,830 tCO ₂ -e (gas equivalent).	Neutral. MTA supports decarbonisation and climate change mitigation. However, climate change mitigation should not come at the expense of healthy freshwater ecosystems and taonga species. That is maladaptive. Climate change mitigation and freshwater health are entwined, and should not be traded off. In addition, there has been no assessment of alternatives to the firming power that this station provides over the next 30 years compared to batteries combined with wind/solar, when prices for these alternatives have dropped dramatically so that they have become, according to the IEA, the cheapest power in history. https://lowcarbonenergy.co/news/solar-is-now-the-cheapest-form-of-energy-in-history-says-iea/ Nor has the impact of climate change on reservoir water levels over the next 30 years been assessed. See below.
Addressing significant environmental issues	The Applicant states that the scheme will not cause any "material change in environmental effects" (Attachment 7) and	Disagree. The scheme itself creates unmitigated environmental issues. Although there will be no <i>change</i> in the type of environmental effects, there are a number of significant existing unmanaged effects that physically

	claims it addresses environmental issues through greenhouse gas reduction (s2.6.1.11).	and biologically impact the HEPS catchment, and culturally impact Muaūpoko.
Consistency with local or regional planning documents	The Applicant states the project is consistent with the Horizons Regional Policy Statement and Regional Plan as existing significant infrastructure.	Conditionally agree. MTA acknowledges that hydroelectricity generation is enabled in the Horizons One Plan. However, the scheme's current unmitigated effects conflicts with direction set by the NPS-FM and matters of control under the One Plan, which prioritises the health and well-being of waterbodies and freshwater ecosystems. We believe the application has not struck the right balance between providing for commercial and environmental values.

Anticipated and known adverse effects of the project on the environment, and the significance of those effects

We have reviewed the Applicant's description of the anticipated and known adverse effects of the project, and the significance of those effects.

Based on the information provided in the referral application, MTA disagree with the Applicant's description of those effects.

The Applicant's summary in Attachment Seven characterises environmental and hydrological impacts as having "no material change" and limits cultural effects to high-level, generalised concerns. This assessment significantly understates the severity of the scheme's impacts on the freshwater environment and Muaūpoko values.

We highlight the following areas of concern. If the application is referred, these topics will be contentious during the substantive stage:

- **Hydrology and minimum flows:**
The Applicant seeks to continue taking 100% of the water in upper river sections of the Tokomaru, and middle sections of the Mangahao, without establishing residual flows. MTA maintains that zero residual flow is ecologically and culturally unacceptable.
- **Freshwater ecology and fish passage:**
Dry riverbeds result in total loss of habitat values and permanent dam structures obstruct the migration of taonga species (tuna, kōkopu, kōaro, torrent fish). Relying on basic "catch and release" measures is insufficient to address the scheme's full impact on habitat and migration.
- **Sedimentation and river dynamics:**

Dams trap sediment and periodic sluicing releases heavy sediment loads, altering riverbed geomorphology, deoxygenating waterways and smothering downstream aquatic habitats. The Mangaora is subject to erosive flows during discharges from the scheme. Significant work is needed to manage these effects and there must be the opportunity for our experts to feed into this mahi during a robust evidence, conferencing and hearing process.

- **Mauri and ki uta ki tai:**

Inter-catchment water transfers disrupt the natural flow of mauri through the awa. Taking from the awa requires us as kaitiaki to give back to the awa. There are no governance or kaitiaki arrangements proposed to date.

MTA understands that the substantive effects of the project will be fully evaluated if the referral application is approved. Should the Minister decide to refer the application despite our opposition, we will seek consent conditions that explicitly avoid, remedy, or mitigate these effects through mandatory minimum flows, ecological restoration initiatives, fish passage remedy or offset approaches, enduring access to sacred sites, and a co-governance/kaitiaki monitoring framework.

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Our specific climate change and hazard concerns include:

- Reduced summer and autumn rainfall paired with the scheme's zero residual flow will further degrade habitats, extending the areas of dry riverbed or flow flows.
- Warmer water temperatures and prolonged low flows will increase toxic cyanobacteria and algal blooms, oxygen depletion, and impacts on taonga species.
- Higher-intensity and more frequent rain events will change flood flow behaviour and impacts (including scouring and bank instability).
- Seismic and landslide risks that arise from the geologically active landscape and ageing infrastructure will increase dam infilling requiring more intensive sluicing and associated effects.

Climate change impacts demonstrate why locking in a 35-year consent duration with no operational changes or minimum flow provisions is ecologically and culturally irresponsible. Should the application proceed, MTA seeks consent conditions that require:

- Adaptive flow management regimes that adjust water abstraction limits based on real-time climate, temperature, and ecological health indicators.
- Comprehensive dam safety, sediment flushing, and flood management plans developed in active partnership with MTA as kaitiaki.

Nāku iti noa, nā



Di Rump

CEO Muaūpoko Tribal Authority