

Contents

Block Offer 2019 Submissions Summary – Iwi	2
THEMES	2
SUBMISSIONS	3
1. TE KOROWAI O NGĀ RUAHINE TRUST (TKONT)	3
2. TE KOTAHITANGA O TE ĀTIAWA TRUST (TKOTA)	6
3. TARANAKI IWI	8
4. TE RŪNANGA O NGĀTI RUANUI TRUST	11
5. TE RŪNANGA O NGĀTI MUTUNGA	15

Block Offer 2019 Submissions Summary – Iwi

ERM received 5 submissions from iwi for Block Offer 2019. A summary and an overview of the major themes recurring throughout the submissions are provided below.

THEMES

All the submissions express some level of objection to all or part of the block offer process and/or request exclusion of areas released.

Protection of customary rights and culturally significant sites

A concurrent theme over many years has been the request for exclusions and/or conditions relating to areas of cultural and historical significance. While the new IFB conditions require permit holders to engage with iwi and allow for a buffer zone of 200m and at least 20 days consultation prior to work commencing, iwi still remain unconvinced that permit holders will engage in a meaningful way. Reviewing industry engagement plans with iwi may be a solution.

Iwi have also highlighted Parihaka Pā as an exclusion example that should be exercised and afforded the same across all marae in Taranaki.

Mapping out the entire regulatory process as it applies to iwi

It has been proposed that the government map out the entire regulatory process as it applies to iwi. An overall understanding of the roles and responsibilities of various Government departments and local government for permit holders exists. However for iwi having to respond to each of the various branches of government means their journey or walk through the various regulatory processes of government is a challenge that leaves them frustrated with repetition. A guide specific to iwi around the minerals and petroleum exploration permitting process may provide some relief.

Previous themes lightly mentioned this year but still relevant include:

- Meeting Treaty of Waitangi obligations
- Selection of suitable companies
- Government capacity and ability to deal with oil spill
- The lack of economic benefits for Māori

SUBMISSIONS

1. TE KOROWAI O NGĀ RUAHINE TRUST (TKONT)

Category:

Post Settlement Governance Entity (PSGE) - Iwi

Relevant release area(s):

Release areas that overlap with their rohe.

Request for exclusions:

YES

Whilst TKONT request that entire blocks within the Ngāruahine rohe be removed from the process. The Crown's past decision in respect of granting the block offers makes TKONT sceptical about the level of exclusion that will be granted on this occasion.

Should the Crown proceed with the release of these blocks, TKONT specifically request that the following areas are excluded (and that no exploration (including infrastructure) be permitted to take place within 500 metres of):

- The land, rivers and waterways that within Ngāruahine's recognised kaitiaki area and statutory acknowledgement areas (Ngāruahine Settlement Claims Act 2016);
- Cultural redress properties (Ngāruahine Settlement claims Act 2016);
- Urupā and wāhi tapu (to be disclosed in confidence to any permit holder);
- Marae (Oeo Pā, Tāwhitinui marae, Waiokura marae, Te Aroha marae, Aotearoa marae, Māwhitiwhiti – Kanihi Pā, Rangataua Pā and Okare ki uta marae), and
- Significant Natural Areas (SNAs) and QEII areas within the rohe (available from the Taranaki Regional Council).

Conditions requested:

YES

ADDITIONAL PERMIT CONDITIONS THAT WOULD PROTECT THE SITES

TKONT requests that the following conditions are placed on the permits:

- TKONT and the hapū of Ngāruahine are involved in the decision making process about which companies may undertake exploration – paying attention to the cultural, social and environmental responsibility of the organisation;
- TKONT and the hapū of Ngāruahine are engaged in early dialogue and consultation on any activity that has the potential to cause adverse effects on freshwater sources (ground and surface water), affect aquatic life (fish and organisms), native flora and fauna and sea birds;

- TKONT and the hapū of Ngāruahine are engaged in early dialogue with permit holders regarding tikanga and cultural sensitivity of sites;
- That the permit holder engages in early dialogue with TKONT and the hapū of Ngāruahine regarding disclosure of wāhi tapu locations to ensure that no culturally significant site will be affected, and that mitigation and management strategies are put in place to ensure no adverse effects;
- TKONT and hapū are engaged in early dialogue and approve the emergency response plans and strategies that the permit holder develops should an adverse incident take place that affects directly or indirectly the mauri of the water, land habitat, species and wider environment;
- The permit holders financially invest in remediation strategies and investments that will enhance the natural environment. The nature of the investment should be determined in partnership with TKONT and the hapū of Ngāruahine;
- The permit holder is required to work alongside Te Korowai to understand and respond to our energy statements and standpoints as articulated in our (draft) Kaitiaki Plan, and
- As a condition of any block offer, permit holders make a positive and direct contribution to conservation and restoration efforts, as well as recognising the special role and considerations of tikanga Māori.

Key matters raised:**PROTECTION PRINCIPLES**

TKONT submits that little attention has been given to the protection of areas, which are of significant interest to Māori. Within the Ngāruahine Settlement Act (2016), protection principles have been established for areas of land and water, for which Ngāruahine share an intimate cultural, spiritual, historical and traditional relationship. These principles provide a very strong foundation to 'test' the cultural appropriateness of any activity within the rohe.

Judging the block offer against these principles, TKONT states it is evident that the new permit areas should not be awarded as there is very little respect for or protection of their interests.

ADVERSE EFFECTS FROM EXPLORATION

There are serious concerns about the environmental impacts caused by exploration and mining. These include, and are not limited to, impact on aquatic life, birdlife, natural biodiversity and quality of the waterways.

The on-going allocation of Block Offers for minerals exploration goes against the commitment to move to a low emissions economy, that is low impact and renewable. TKONT sees the need to take a stand against oil and gas explorations in favour of leadership and investment in solar, wave, renewable electricity and hydrogen. Transitioning to a low-emissions economy requires leadership and commitment, and in doing so hard decisions need to be made that may not work in the interests of the traditional energy producers that have dominated our economy and our policy focus thus far.

RECOMMENDATIONS

Te Korowai o Ngāruahine		
Request	Recommendation	
Exclusions:		
TKONT oppose any further petroleum and mineral exploitation within the Taranaki area.	No	This does not align with the CMA and consideration the minister must consider.
Should the Crown proceed TKONT request that no permitting to take place within 500m of: <ul style="list-style-type: none"> - waterways in TKONT rohe have statutory status under the Ngāruahine Settlement Act 2016; - Cultural redress properties - urupā and wāhi tapu - marae - Significant Natural Areas 	No	The new Invitation For Bids condition since 30 April 2019 explicitly requires permit holders to engage with iwi on an ongoing basis, with specific early engagement requirements in relation to activities to be undertaken within 200 metres of areas of significance to iwi. ¹
Conditions requested:		
TKONT and the hapū of Ngāruahine are involved in the decision making process about which companies may undertake exploration	No	Invitations for Bids are closely scrutinised over months by an in-house team of experts. As a part of the new IFB permit holders are required to engage with iwi.
TKONT and the hapū of Ngāruahine are engaged in early dialogue and consultation on any activity that has the potential to cause adverse effects on freshwater sources (ground and surface water), affect aquatic life (fish and organisms), native flora and fauna and sea birds;	Yes	Active protection – Annual Iwi Engagement reports from permit holders should reflect these conditions
TKONT and the hapū of Ngāruahine are engaged in early dialogue with permit holders regarding tikanga and cultural sensitivity of sites;	Yes	Active protection – Iwi Engagement reports from permit holders should reflect these conditions..
That the permit holder engages in early dialogue, with TKONT and the hapū of Ngāruahine, to ensure that no culturally significant site will be affected, and that mitigation and management strategies are put in place to ensure no adverse effects;	Yes	Active protection – Iwi Engagement reports from permit holders should reflect these conditions.
TKONT and hapū are engaged in early dialogue and approve the emergency response plans and strategies that the permit holder develops should an adverse incident take place that affects directly or indirectly the mauri of the water, land habitat, species and wider environment;	Yes	Active protection – Iwi Engagement reports from permit holders should reflect these conditions.
That permit holders financially invest in remediation strategies and investments that will enhance the natural environment. The nature of the investment should be determined in partnership with TKONT and the hapū of Ngāruahine;	No	Permit holders are required to engage with iwi on an ongoing basis. The nature of their relationship will be determined by iwi.
That permit holders are required to work alongside Te Korowai to understand and respond to our energy statements and standpoints as articulated in our (draft) Kaitiaki Plan, and	No	
That permit holders make a positive and direct contribution to conservation and restoration efforts, as well as	No	

¹ New conditions in the IFB are online

<https://www.nzpam.govt.nz/permits/petroleum/block-offer/block-offer-2018-consultation/>

recognising the special role and considerations of tikanga Māori		
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2. TE KOTAHITANGA O TE ĀTIAWA TRUST (TKOTA)

Category:

PSGE (Iwi)

Relevant release area(s):

Not stated

Request for exclusions:

YES

Exclusions/amendments requested:

The Trust and Hapū oppose the granting of the following blocks which reside within the rohe of Te Atiawa:

- 174E39/1-2A;
- 174E39/1-2B;
- 174E39/2-1;
- 174E38/32-3;
- 174E39/2-4;
- 174E39/8-1; and
- 174E38/8-2.

Conditions requested:

None

Key matters raised:

General objection response that raises the following points:

- The Trust and Hapū oppose the granting of the above blocks. The landscape within which the above blocks are located is rich in Te Atiawa history. This is evident by the number of sites, rights and interests shown in maps attached to response.
- This proposal has the potential to impact on the sites, rights and interests shown in the maps in Annex 2. These maps outline:
 - a) The Statutory Acknowledgement areas and Statements of Association proving their cultural significance, as recognised in the Te Atiawa Iwi Claims Settlement Act 2016;
 - b) New Zealand Archaeological Authority (NZAA) recorded wāhi tapu sites;
 - c) New Plymouth District Plan (NPDP) recorded wāhi tapu sites;
 - d) Te Atiawa wāhi tapu sites to be formally recorded;
 - e) Māori owned land; and
 - f) Native Reserves.

- In addition, Blocks 174E39/1-2A, 74E39/1-2B, 174E39/2-1 and 174E38/32-3 form part of New Plymouth town district and are currently zoned residential in the operative and proposed New Plymouth District Plan.
- The Trust and Hapū request that the first Annual Forum and first Annual Block Offer Round Meeting take place in accordance with obligations within the Relationship Agreement with the Ministry of Business, Innovation and Employment in Relation to Petroleum and Minerals.
- The Trust requests that enhanced iwi engagement occurs immediately to protect these areas of particular importance to Te Atiawa in accordance with Obligation 9.1 (a),(b) and (c) within the Relationship Agreement with the Ministry of Business, Innovation and Employment in Relation to Petroleum and Minerals (which forms part of the Te Atiawa Iwi Claims Settlement Act 2016).

RECOMMENDATIONS

Te Kotahitanga o Te Ātiawa		
Request		Recommendation
Exclusions		
Blocks 174E39/1-2A, 174E39/1-2B, 174E39/2-1, 174E38/32-3, 174E39/2-4, 174E39/8-1 and 174E38/8-2.	No	Exclusions of entire blocks
a) The Statutory Acknowledgement areas and Statements of Association proving their cultural significance, as recognised in the Te Atiawa Iwi Claims Settlement Act 2016:	No	The new Invitation For Bids condition since 30 April 2019 explicitly requires permit holders to engage with iwi on an ongoing basis, with specific early engagement requirements in relation to activities to be undertaken within 200 metres of areas of significance to iwi. ²
b) New Zealand Archaeological Authority (NZAA) recorded wāhi tapu sites;	No	
c) New Plymouth District Plan (NPDP) recorded wāhi tapu sites;	No	
d) Te Atiawa wāhi tapu sites to be formally recorded;	No	
e) Māori owned land; and	No	Owners have rights to deny access.
f) Native Reserves.	No	Consider these are managed under a different legislation.
Conditions		
Request that the first Annual Forum and first Annual Block Offer Round Meeting take place in accordance with obligations within the Relationship Agreement with MBIE in Relation to Petroleum and Minerals.	Yes	Partnership - This has occurred but the obligation is annual. Recommend a particular focus on Taranaki region with iwi engagement to discuss and provide ongoing support for the iwi.
Requests that enhanced iwi engagement occurs immediately to protect these areas of particular importance to Te Atiawa in accordance with Obligation 9.1 (a),(b) and (c) within the Relationship Agreement with MBIE in Relation to Petroleum and Minerals	Yes	Partnership - This has occurred but the obligation is annual. Recommend a particular focus on Taranaki region with iwi engagement to discuss and provide ongoing support for the iwi.

² New conditions in the IFB are online

<https://www.nzpam.govt.nz/permits/petroleum/block-offer/block-offer-2018-consultation/>

3. TARANAKI IWI

Category:

PSGE (Iwi)

Relevant release area(s):

Not stated

Request for exclusions:

YES

Exclusions/amendments requested:

- The information provided in the submission is not released publicly.

Taranaki Iwi seeks the following exclusion areas from the onshore Block Offer 2019 within the Taranaki Iwi rohe:

- Land within an agreed 200m distance from all awa/rivers (their tributaries and marginal strips) all recognised and provided for under the Taranaki Iwi Claims Settlement Act 2016. Statutory Acknowledgement Areas need to be adequately recognised alongside the unique role that Iwi/hapū play as kaitiaki in protecting these areas. (attached a list of Taranaki Iwi Statutory Acknowledgement and Deeds of Recognition Areas);
- Land within an agreed 200m distance from all Taranaki Iwi Significant Waterways & Main Tributaries. This ensures adequate protection is afforded to these areas from the earliest stage of development, including the block offer process. (attached a list of Taranaki Iwi Significant Waterways & Main Tributaries);
- Land within an agreed 200m distance from all Cultural Redress Properties recognised and provided for under the Taranaki Iwi Claims Settlement Act 2016. (attached a list of Taranaki Iwi Cultural Redress Properties);
- Land within an agreed 200m distance from all Deferred Selection Properties recognised and provided for under the Taranaki Iwi Claims Settlement Act 2016. (attached a list of Taranaki Iwi Deferred Selection Properties);
- Land within an agreed 200m distance of Taranaki Iwi Marae/Pā (and the reservation lands they are legally responsible for under the Māori Land Court). A map that both identifies the location of Taranaki Iwi Marae is attached to the Submission (Please refer to submission for Taranaki Iwi Marae Map and sites of significance);

- Taranaki note that Parihaka Papakāinga has been removed from the block offer further to their earlier submissions - they submit further that all Taranaki iwi marae/pā are culturally and causally connected to the significance of Parihaka and should also be removed from Block Offer 2019;
- Land within an agreed 200m distance of sites of historical, cultural and spiritual significance and where customary rights continue to be exercised. (attached a list of sites and co-ordinates Taranaki Iwi Sites of Significance);
- Land within an agreed 200m distance of identified urupa sites;
- Land within an agreed 200m distance of native vegetation and wetlands that are 1 ha or greater; and
- Land within an agreed 200m distance of conservation estate and reserves and conservation covenanted lands.

Conditions requested:

YES

- To recognise the area's importance to Taranaki Iwi and that Taranaki Iwi request that a permit holder give the iwi, marae/pā or hapū notice before a specific activity begins and that a relationship agreement is entered into prior to any works being undertaken.
- In evaluating who will become the successful applicant, consideration must be given to the applicant's proven ability or willingness to become involved in meaningful engagement with the relevant iwi/hapū authority
- Where proposed activity in an onshore block may impact upon taonga species, native habitat, vegetation and wildlife, consultation should take place with the relevant iwi/hapū for the purposes of determining appropriate measures to ensure sufficient protection.
- The applicant will consult with Taranaki Iwi to establish appropriate responses, including key contacts, in the case of emergencies that impact on the mouri of the water, biodiversity and wider environment.

Key matters raised:

General objection response that raises the following points:

- Taranaki Iwi ask for strong standards to be established and further maintained so that both Iwi and the wider public are reassured that only the best operators are being qualified to search for and use natural resources.
- Taranaki Iwi have learnt that the best operators are very inclusive in their approach to development; they engage early with Iwi and are also forthcoming with information.

- As kaitiaki/guardians for their rohe, Taranaki Iwi is not only seeking adequate protection for the environment but also to ensure that customary rights are protected.

Recommendations

Taranaki Iwi		
Request		Recommendation
Exclusions		
Taranaki Iwi seeks the following exclusion areas from the onshore Block Offer 2019 within the Taranaki Iwi rohe:		
Land within an agreed 200m distance from all awa/rivers (their tributaries and marginal strips) all recognised and provided for under the Taranaki Iwi Claims Settlement Act 2016. Statutory Acknowledgement Areas need to be adequately recognised alongside the unique role that Iwi/hapū play as kaitiaki in protecting these areas. (attached a list of Taranaki Iwi Statutory Acknowledgement and Deeds of Recognition Areas);	n/a	The new Invitation For Bids condition since 30 April 2019 explicitly requires permit holders to engage with iwi on an ongoing basis, with specific early engagement requirements in relation to activities to be undertaken within 200 metres of areas of significance to iwi. ³
Land within an agreed 200m distance from all Taranaki Iwi Significant Waterways & Main Tributaries. This ensures adequate protection is afforded to these areas from the earliest stage of development, including the block offer process. (attached a list of Taranaki Iwi Significant Waterways & Main Tributaries);	n/a	
Land within an agreed 200m distance from all Cultural Redress Properties recognised and provided for under the Taranaki Iwi Claims Settlement Act 2016. (attached a list of Taranaki Iwi Cultural Redress Properties);	n/a	
Land within an agreed 200m distance from all Deferred Selection Properties recognised and provided for under the Taranaki Iwi Claims Settlement Act 2016. (attached a list of Taranaki Iwi Deferred Selection Properties);	n/a	
Land within an agreed 200m distance of Taranaki Iwi Marae/Pā (and the reservation lands they are legally responsible for under the Māori Land Court). A map that both identifies the location of Taranaki Iwi Marae is attached to the Submission (Please refer to submission for Taranaki Iwi Marae Map and sites of significance);	n/a	
Land within an agreed 200m distance of sites of historical, cultural and spiritual significance and where customary rights continue to be exercised. (attached a list of sites and co-ordinates Taranaki Iwi Sites of Significance);	n/a	
Land within an agreed 200m distance of identified urupa sites;	n/a	
Land within an agreed 200m distance of native vegetation and wetlands that are 1 ha or greater; and	No	Consider this is protected under different legislation.
Taranaki note that Parihaka Papakāinga has been removed from the block offer further to their earlier submissions - they submit further that all Taranaki iwi marae/pā are culturally and causally connected to the significance of Parihaka and should also be removed from Block Offer also.	Yes	Active protection - As above – Recommend also to map all Marae of Taranaki and remove from future Block Offer release areas or consider buffer zones around them.

³ New conditions in the IFB are online

<https://www.nzpam.govt.nz/permits/petroleum/block-offer/block-offer-2018-consultation/>

Land within an agreed 200m distance of conservation estate and reserves and conservation covenanted lands.	No	As above
Conditions		
To recognise the area's importance to Taranaki Iwi and that Taranaki Iwi request that a permit holder give the iwi, marae/pā or hapū notice before a specific activity begins and that a relationship agreement is entered into prior to any works being undertaken.	No	Iwi engagement is required at least 20 working days prior to, and in connection with, the permit holder undertaking activities. No – to a relationship agreement but applicants should be encouraged to engage and iwi engagement reports will be monitored.
In evaluating who will become the successful applicant, consideration must be given to the applicant's proven ability or willingness to become involved in meaningful engagement with the relevant iwi/hapū authority	No	Active protection and partnership - Although a NO – we need to consider our role and mechanisms we have to ensure and monitor applicants ability to engage properly/well such as the annual iwi engagement reports.
Where proposed activity in an onshore block may impact upon taonga species, native habitat, vegetation and wildlife, consultation should take place with the relevant Iwi/hapū for the purposes of determining appropriate measures to ensure sufficient protection.	No	Consider this to be managed through the RMA.
The applicant will consult with Taranaki Iwi to establish appropriate responses, including key contacts, in the case of emergencies that impact on the mauri of the water, biodiversity and wider environment.	No	This can be managed through providing applicant contact details, engagement with iwi and proactive approaches by the iwi.

4. TE RŪNANGA O NGĀTI RUANUI TRUST

Category:

PSGE (Iwi)

Relevant release area(s):

Request for exclusions:

YES

Exclusions/amendments requested:

Ngāti Ruanui seeks the following land exclusions from the blocks where they may be impacted:

- Land within 20 metres of the Tangahoe, Patea and Whenuakura Awa (Rivers). The Tangahoe, Patea and Whenuakura Awa are Statutory Acknowledgement Areas under the Ngāti Ruanui Claims Settlement Act 2003. Further, the Tangahoe, Patea and Whenuakura Awa are specifically recognised catchments in the Ngāti Ruanui Environmental Management Plan (Section 2 Resource Management Act 1991). Ngāti Ruanui considers that it is inappropriate for any petroleum exploration to occur close to their Awa.
- Land within 50 metres of their Marae sites. Referral to Te Rūnanga o Ngāti Ruanui is considered the most practical way for the successful company to identify the location of such sites when exploration activities occur. This is not a protection that is afforded to

Ngāti Ruanui through the Resource Management Act and resulting local government District Plan.

- Identified Urupa sites. While these sites are likely to be small in number, acknowledgement of such sites is deemed important for exclusion given their historical and cultural sensitivity to hapu and whanau. Referral to Te Rūnanga o Ngāti Ruanui is considered the most practical way for the successful company to identify such sites when exploration activities occur. No protection is afforded to these sites under the South Taranaki District Plan.
- Any area, regardless of land title boundaries, of native vegetation 1 ha or greater, where that vegetation is 3 metres or greater in height. The loss of native vegetation within the Taranaki Region is significant. The protection and enhancement of biodiversity is a significant policy feature of the Ngāti Ruanui Environmental Plan. It is noted that native vegetation is often not afforded any adequate protection under regional or district plans and therefore does not automatically sit within the Resources Management Act considerations.

Conditions requested:

- That any exploration activity that occurs within 100 metres of the Tangahoe, Whenuakura and Patea Awa are referred by the successful company to Ngāti Ruanui for comment. Ngāti Ruanui will provide comment within 20 working days of notification. *(This specific referral does not affect any process or engagement through the Resource Management Act 1991)*. This referral will ensure the Statutory Acknowledgment Area is adequately recognised and our unique role of Kaitiakitanga is enduring through the exploration permit process, especially during a site selection process for exploration activities.

Key matters raised:

Ngāti Ruanui ask that only the most suitable companies are given rights to search for and use natural resources. In particular any evaluation should determine a company's credentials against their ability to actively engage and involve iwi in the activities they wish to undertake.

Recommendations

Te Rūnanga o Ngāti Ruanui Trust		
Request		Recommendation
Exclusions		
Land within 20 metres of the Tangahoe, Patea and Whenuakura Awa (Rivers). The Tangahoe, Patea and Whenuakura Awa are Statutory Acknowledgement Areas under the Ngāti Ruanui Claims Settlement Act 2003. Further, the Tangahoe, Patea and Whenuakura Awa are specifically recognised catchments in the Ngāti Ruanui Environmental Management Plan (Section 2 Resource Management Act 1991). Ngāti Ruanui considers that it is inappropriate for any petroleum exploration to occur close to their Awa.	n/a	The new Invitation For Bids condition since 30 April 2019 explicitly requires permit holders to engage with iwi on an ongoing basis, with specific early engagement requirements in relation to activities to be undertaken within 200 metres of areas of significance to iwi. ⁴
Land within 50 metres of their Marae sites. Referral to Te Rūnanga o Ngāti Ruanui is considered the most practical way for the successful company to identify the location of such sites when exploration activities occur. This is not a protection that is afforded to Ngāti Ruanui through the Resource Management Act and resulting local government District Plan.	n/a	
Identified Urupa sites. While these sites are likely to be small in number, acknowledgement of such sites is deemed important for exclusion given their historical and cultural sensitivity to hapu and whanau. Referral to Te Rūnanga o Ngāti Ruanui is considered the most practical way for the successful company to identify such sites when exploration activities occur. No protection is afforded to these sites under the South Taranaki District Plan.	n/a	
Any area, regardless of land title boundaries, of native vegetation 1 ha or greater, where that vegetation is 3 metres or greater in height. The loss of native vegetation within the Taranaki Region is significant. The protection and enhancement of biodiversity is a significant policy feature of the Ngāti Ruanui Environmental Plan. It is noted that native vegetation is often not afforded any adequate protection under regional or district plans and therefore does not automatically sit within the Resources Management Act considerations.	No	Consider these are protected by other legislation.
Conditions		
That any exploration activity that occurs within 100 metres of the Tangahoe, Whenuakura and Patea Awa are referred by the successful company to Ngāti Ruanui for comment. Ngāti Ruanui will provide comment within 20 working days of notification. <i>(This specific referral does not affect any process or engagement through the Resource Management Act 1991).</i> This referral will ensure the Statutory Acknowledgment Area is adequately recognised and our unique role of Kaitiakitanga is enduring through the exploration permit process, especially during a site selection process for exploration activities.	n/a	New IFB condition covers this.

⁴ New conditions in the IFB are online

<https://www.nzpam.govt.nz/permits/petroleum/block-offer/block-offer-2018-consultation/>

5. TE RŪNANGA O NGĀTI MUTUNGA

Category:

PSGE (Iwi)

Relevant release area(s):

Block Offer 2019

Request for exclusions:

YES

Exclusions/amendments requested:

- The following statutory acknowledgement areas:
 - Part Mimitangiatua-Pukearuhe Coast Marginal Strip
 - Waitoetoe Beach Recreation Reserve;
 - Mimitangiatua Scenic Reserve;
 - Mimitangiatua Gorge Scientific Reserve;
 - Urenui River Marginal Strip;
 - Urenui River;
 - All Statutory Acknowledgement Areas that are within the Block offer Area.

- All Waahi Taonga sites as identified on the draft NPDC District Plan.

- All sites of significance included in the Draft Taranaki Regional Council Coastal Plan which was notified early this year (the sites are listed in Schedule 5 of the Coastal Plan and we have attached a copy)

- Urenui Pā Reserve.

- Tupuna awa - not covered in the Statutory Acknowledgement areas - namely Wai-iti Stream, Papatiki stream and Waitoetoe River.

Conditions requested:

YES

- That NZ Petroleum and Minerals make any Block Offer applicants aware of their legal responsibility (under the Resource Management Act 1991 and Heritage New Zealand Pouhere Taonga Act 2014) to protect these sites from any damage their activities may cause.
- The information provided in the submission that describes or locates their wāhi tapu not be included in the information that is published on the NZP&M website.

Key matters raised:

- Conflict with the Ngāti Mutunga iwi Environmental Management Plan. The Rūnanga asserts its rights of ownership to any minerals found within the iwi rohe boundary in the Ngāti Mutunga Iwi Environmental Management Plan.
- Negative impact on sites of cultural importance of to Ngāti Mutunga. The historical and cultural significance of Ngāti Mutunga area of interest within the block offer is reflected in the high number of waahi tapu sites that are located here. These sites have been identified, located and mapped by Te Rūnanga o Ngāti Mutunga for inclusion in the New Plymouth Council District Plan, which will be notified by the New Plymouth District Plan in September 2019 and are now operative sites.

Recommendations

Te Rūnanga o Ngāti Mutunga		
Request		Recommendation
Exclusions		
<p>The following statutory acknowledgement areas:</p> <ul style="list-style-type: none"> • Part Mimitangiatua-Pukearuhe Coast Marginal Strip • Waitoetoe Beach Recreation Reserve; • Mimitangiatua Scenic Reserve; • Mimitangiatua Gorge Scientific Reserve; • Urenui River Marginal Strip; • Urenui River; • All Statutory Acknowledgement Areas that are within the Block offer Area. 	n/a	The new Invitation For Bids condition since 30 April 2019 explicitly requires permit holders to engage with iwi on an ongoing basis, with specific early engagement requirements in relation to activities to be undertaken within 200 metres of areas of significance to iwi. ⁵
All Waahi Taonga sites as identified on the draft NPDC District Plan.	n/a	
All sites of significance included in the Draft Taranaki Regional Council Coastal Plan which was notified early this year	n/a	
Urenui Pa Reserve.	n/a	
Tupuna awa - not covered in the Statutory Acknowledgement areas - namely Wai-iti Stream, Papatiki stream and Waitoetoe River.	n/a	
Conditions		
That NZ Petroleum and Minerals make any Block Offer applicants aware of their legal responsibility (under the Resource Management Act 1991 and Heritage New Zealand Pouhere Taonga Act 2014) to protect these sites from any damage their activities may cause.	n/a	Bidders are informed that they should be familiar with the following legislation: (a) the Resource Management Act 1991; (b) the Health and Safety at Work Act 2015 (and regulations made under that Act dealing with health and safety in relation to petroleum exploration and extraction); and (c) the Heritage New Zealand Pouhere Taonga Act 2014.
The information provided in the submission that describes or locates their wāhi tapu not be included in the information that is published on the NZP&M website.	n/a	Under the new IFB, iwi engagement is required at least 20 working days prior to, and in connection with, the permit holder undertaking activities within 200 metres of recorded and unrecorded Wāhi Tapu and Urupā (to be disclosed in confidence).

⁵ New conditions in the IFB are online

<https://www.nzpam.govt.nz/permits/petroleum/block-offer/block-offer-2018-consultation/>



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Rāapa, 16 Whiringa ā-nuku, 2019

PROPOSED BLOCK OFFER 2019

Tēnā koe Sarah,

1. As the post-settlement governance entity for Ngāruahine, Te Korowai o Ngāruahine Trust (TKONT) has the following submission to make on the New Zealand Petroleum and Minerals proposed block offer 2019/20 (part two, noting a block offer consultation earlier in 2019).

BACKGROUND TO CONSULTATION

2. Following the enactment of the Crown Minerals (Petroleum) Amendment Act 2018, in February 2019 the Government re-released the 2018 Block Offer with an extended area of 2200 square kilometres, up from 1703 square kilometres, originally consulted upon in 2018. Te Korowai was very disappointed to receive notice of this intent and proposed that there was no clear or explained reason for the 500 square kilometre increase. We are disappointed to advise that we did not receive a reply to this enquiry.
3. TKONT has submitted on the Block Offers since 2015. In each of the submissions we have requested restrictions, should the block offer area be granted. The reply from



TE KOROWAI O
NGĀRUAHINE
TRUST

the Department, where we have received one has stated, that in their opinion sufficient protection was already afforded to the sites and areas that Ngāruahine identified as warranting protection. TKONT does not wholly agree with this assertion, as rarely does the regulatory process allow for the total cumulative effects of an operation to be considered. Nor are the the concerns of the iwi and tangata whenua afforded full and proper consideration. The regulatory framework is full of inconsistencies and uncertainties, and we wonder if government officials have sufficient knowledge about the regulatory frameworks and how they actually work and interface with one another. We propose that the Government map out the entire process, as it relates to minerals permits and explorations so they may understand the roles and responsibilities of the various Government departments and local government and understand how Iwi navigate their way through these processes. Te Korowai at the innumerable hui that we attend with the various arms of government has proposed this action, so you may walk in our shoes. Whilst the task is challenging, until government takes the time to understand our positions, constraints and frustrations, these endless consultations seem futile.

4. In 2018 Te Korowai, along with Taranaki and Te Atiawa Iwi met with Department Officials to discuss our Block Offer submissions and the lack of protection that we have been able to secure for our respective rohe. An outcome of the hui was for the Department to review our submissions to provide feedback and critique that would enable us to create a more efficacious argument. In our submission earlier this year (April 2019) we advised that this had not taken place. Now, we are in October 2019 and there has still been no traction with your Department's commitment. As Iwi we work hard to engage in your processes, following your timeframes, and provide information that is useful to the process and it is disappointing when we do not receive information from the Department.



5. Te Korowai has not, until recently received feedback from the Department about the outcome of the Block Offer consultations, nor how our submissions have been treated, and whether we have been successful in securing any of our requests. We recently advised the new Māori Relationships Officer, who has now sent a summary of the Taranaki iwi submissions and how the recommendations have been treated. We now know that there is a 200m exclusion zone around wāhi tapu. This is a positive move, and it is now more important than ever that permit holders engage in early conversation with iwi and hapū as there are a large number of wāhi tapu across our rohe, some disclosed and many undisclosed.

6. Regarding our general assertions and opposition to the granting of exploration permits throughout our rohe, we have previously been advised that the commercial imperative in Taranaki is so great, that Ngāruahine is unlikely to be granted the protections that it has requested. To date, the economic interests have outweighed the environmental and cultural concerns. Can this Government please advise us if this consideration remains the same, and how the Block Offer process now interfaces with the Resource Minerals Strategy, which to some extent seeks to balance the economic interests to environmental and cultural considerations. It is also unclear why the Government keeps awarding Block Offer permits when we should be actively detracting from this kind of activity and supporting more sustainable and suitable energy approaches.



TARANAKI BLOCKS

8. We would like to formally express our opposition to any further form of petroleum and mineral exploration within the Taranaki area proposed because of the on-going health and wellbeing of the land, the waters and the people. The whole of our rohe is now subject to a Block Offer. So, the burden of responsibility is now upon us to protect our sacred sites.
9. As one of the kaitiaki of the area Ngāruahine along with our whanaunga iwi Taranaki and Ngāti Ruanui we have a kaitiaki obligation to protect the integrity of the South Taranaki environment (within our rohe), taonga species, wāhi tapu, tauranga waka sites, mahinga kai, fishing grounds and other native habitats. We believe this responsibility alone is sufficient to exclude the proposed areas (where they affect Ngāruahine lands and waters).

REASONS THE BLOCKS SHOULD BE EXCLUDED

10. The rohe of Ngāruahine lies between the mouths of the Taungatara Stream in the West, the Waingongoro River in the East and the sources of these rivers from the Taranaki maunga. The block offer includes significant waterways, which are given statutory acknowledgment status under the Ngāruahine Settlement Act 2016.
11. The block offer area includes the ancestral land of the six recognised hapū of Ngāruahine, and as such includes many wāhi tapu, urupā and marae. Significant areas of the proposed area include lands that were significant as part of the Taranaki wars, and include areas where loss of life occurred. The integrity and protection of this history must be protected and preserved.
12. Te Korowai is currently in a process of documenting our wāhi tapu. Some sites are already mapped in the South Taranaki District Council and Taranaki Regional Council



Plans, however not all have been disclosed due to their sensitivity. The sites of significance are throughout our rohe and disclosure of these important sites will be enabled via kanohi ki te kanohi korero with our affected hapū.

13. We note that as an outcome of the previous consultation “Parikaha Pā has been excluded from exploration. During the last consultation the proposal also stated that “land that is being investigated by the New Plymouth District Council and Taranaki iwi regarding possible wāhi tapu sites” would be excluded. As already stated, Ngāruahine is conducting its internal processes regarding the identification of wāhi tapu sites. It is therefore not reasonable or proper for the Department to deny the presence or significance of the important cultural and historical sites, as we go through this process. We expect the same protection as is being offered to Taranaki Iwi for their “potential” sites. We are unsure why one Iwi’s wāhi tapu are considered more important than others. Perhaps the Department could help us to understand this.

IMPORTANCE AND CONNECTION TO NGĀ HAPŪ O NGĀRUAHINE

14. As we have provided in previous submissions, the relationship of our hapū to its ancestral lands, as detailed in our Treaty Settlement, which we urge the Department to review. In addition to the Statutory Acknowledgments made as part our Treaty redress, as stated above, some of our sites are already documented in Council Planning documents. For details of the considerable number of other sites, the Department must engage with our hapū prior to the inclusion of any land blocks.

PROTECTION PRINCIPLES

15. Little attention has been given to the protection of areas, which are of significant interest to Māori. It would be useful if the Ministry recognised and considered how the proposed explorations impact on such areas. Within the Ngāruahine Settlement Act (2016), protection principles have been established for areas of land and water,



for which Ngāruahine share an intimate cultural, spiritual, historical and traditional relationship. These principles provide a very strong foundation to 'test' the cultural appropriateness of any activity within the rohe.

- a. Protection of wāhi tapu, indigenous flora and fauna and the wider environment;
- b. Recognition of the distinct Iwi mana, kaitiakitanga and tikanga;
- c. Respect for the distinct tikanga and kaitiakitanga;
- d. Encouragement of recognition and respect for the particular association Iwi with the stated lands and water;
- e. Accurate portrayal of the separate and distinct associations and kaitiakitanga relationship of Iwi with the lands and waters;
- f. Respect for and recognition of the distinct relationship of Iwi with wāhi tapu across the rohe; and
- g. Recognition of the interest of Iwi in actively protecting species within the defined areas.

16. Judging the block offer against these principles, it is evident that the new permit areas should not be awarded as there is very little respect for or protection of our interests.

ADVERSE EFFECTS FROM EXPLORATION

17. There are serious concerns about the environmental impacts caused by exploration and mining. While the actual impact of any exploration and mining is seldom agreed between Crown, oil and gas explorers, environmental activists and iwi – the areas that are subject to the block offer have the potential to be impacted. These include, and are not limited to, impact on aquatic life, birdlife, natural biodiversity and quality of the waterways. Whilst it is our strong preference that permits are not granted, should



the block offer proceed permit holders must work alongside tangata whenua (which is bigger than consult with) on the mitigation and avoidance of environmental impacts. At a minimum we would expect to see evidence of commitment and action to the mitigation of risks and any adverse effects on our environment. We also request that as a condition of any block offer, permit holders make a positive and direct contribution to conservation and restoration efforts, as well as recognising the special role and considerations of tikanga Māori. For too long, explorers have exploited our rohe, taken the gains elsewhere and have failed to re-invest back into the people and the land for which we are kaitiaki.

18. The on-going allocation of Block Offers for minerals exploration goes against the commitment to move to a low emissions economy, that is low impact and renewable. When the Government continues to offer up more explorations, we lessen the need for industry and community to seek out less harmful alternatives. With the Block Offer permits granted over recent years, this sector will continue to operate for some time. So, for those who would argue that the Government (off-shore) restrictions will ruin the Taranaki economy, this will only eventuate if we do not re-invest our efforts and skills into a sustainable technology future and a diversification of our economy, that Taranaki can be the centre of.
19. The reality is climate change is worsening, our harmful emissions are increasing, and the health and wellbeing of all people requires a stable social and cultural infrastructure, with a healthy, safe natural resource systems. We need to take a stand against oil and gas explorations in favour of leadership and investment in solar, wave, renewable electricity and hydrogen. Transitioning to a low-emissions economy requires leadership and commitment, and in doing so hard decisions need to be made that may not work in the interests of the traditional energy producers that have dominated our economy and our policy focus thus far.



EXCLUSIONS

20. Whilst TKONT requests that entire block offer within the Ngāruahine is removed from the process, the Crown's past decisions in respect of granting the block offers makes us sceptical about the level of exclusion that will be granted on this occasion.
21. Should the Crown proceed with the release of these blocks, Te Korowai specifically request that the following areas are excluded, (and that no exploration (including infrastructure) be permitted to take place within 500 metres (and increase of the current 200 meters restriction) of:
- a) The land, rivers and waterways that within Ngāruahine's recognised kaitiaki area and statutory acknowledgement areas (Ngāruahine Settlement Claims Act 2016);
 - b) Cultural redress properties (Ngāruahine Settlement claims Act 2016);
 - c) Urupā and wāhi tapu (to be disclosed in confidence by hapū to any prospective permit holder);
 - d) Marae (Oeo Pā, Tāwhitinui Mārae, Waiokura Marae, Te Aroha Marae, Aotearoa Marae, Mawhitiwhiti – Kanihi Pā, Rangatapu Pā, and Okare Ki Uta Marae, and
 - e) Significant Natural Areas (SNAs) and QEII areas within the rohe (available from the Taranaki Regional Council).

ADDITIONAL PERMIT CONDITIONS THAT WOULD PROTECT THE SITES

22. Should the block offer be awarded for exploration, and affect the Ngāruahine rohe, Te Korowai requests that the following conditions are placed on the permits:
- a. TKONT and the hapū of Ngāruahine (Kanihi-Umutahi (me etahi), Okahu-Inuawai (me etehi), Ngati Manuhiakai, Ngati Tu, Ngati Haua, Ngati Tamaahuroa-Titahi) are



- involved in the decision-making process about which companies may undertake their exploration – paying attention to the cultural, social and environmental responsibility of the organisation;
- b. The above stated areas (para 20) are excluded;
 - c. Te Korowai and the hapū of Ngāruahine (Kanihi-Umutahi (me etahi), Okahu-Inuawai (me etehi), Ngati Manuhiakai, Ngati Tu, Ngati Haua, Ngati Tamaahuroa-Titahi) are engaged in early dialogue and consultation on any activity that has the potential to cause adverse effects on freshwater sources (ground and surface water), affect aquatic life (fish and organisms), native flora and fauna and sea birds;
 - d. Te Korowai and the hapū of Ngāruahine (Kanihi-Umutahi (me etahi), Okahu-Inuawai (me etehi), Ngati Manuhiakai, Ngati Tu, Ngati Haua, Ngati Tamaahuroa-Titahi) are engaged in early dialogue with permit holders regarding tikanga and cultural sensitivity of sites;
 - e. Te Korowai requests that the permit holder engage in early dialogue with TKONT and the hapū of Ngāruahine (Kanihi-Umutahi (me etahi), Okahu-Inuawai (me etehi), Ngati Manuhiakai, Ngati Tu, Ngati Haua, Ngati Tamaahuroa-Titahi) regarding the disclosure of waahi tapu locations, to ensure that no culturally significant site will be affected, and to ensure that mitigation and management strategies are put in place to ensure no adverse effects;
 - f. Te Korowai and hapū (Kanihi-Umutahi (me etahi), Okahu-Inuawai (me etehi), Ngati Manuhiakai, Ngati Tu, Ngati Haua, Ngati Tamaahuroa-Titahi) are engaged in early dialogue about emergency response plans and strategies that the permit holder develops should an adverse incident take place that affects directly or indirectly the mauri of the water, land habitat, species and wider environment;
 - g. The permit holders financially invest in remediation strategies and investments that will enhance the natural environment. The nature of the investment to be determined in partnership with Te Korowai and the hapū of Ngāruahine (Kanihi-



Umutahi (me etahi), Okahu-Inuawai (me etehi), Ngati Manuhiakai, Ngati Tu, Ngati Haua, Ngati Tamaahuroa-Titahi); and

- h. The permit holder is required to works alongside Te Korowai to understand and respond to our energy statements and standpoints as articulated in our (draft) Kaitiaki Plan.

CONCLUSION

23. The risk associated with oil and gas exploration should not be underestimated. The effects of an adverse event would be catastrophic, and the environmental effects would cause far reaching effects on the whenua and awa.
24. The impacts of climate change are real, and its causes are understood. Whilst the energy sector is not the sole cause of this crisis, it is responsible, and we have the ability to take action in this area.
25. Proper consideration and attention to the matters raised in this submission would confirm your commitment to recognising the significance of Te Tiriti o Waitangi as it applies to the Crown Minerals process and demonstrate your commitment to respecting the Ngāruahine as mana whenua within the proposed areas.



26. We look forward to receiving a reply from you in respect of the statements made in this submission. Please contact me, at policy@ngaruahine.iwi.nz for any matters of clarification.

Naku iti noa nā

A handwritten signature in black ink that reads 'Louise Tester'.

Louise Tester (PhD)

Pourangahau Matua (Research and Policy Manager)



Sarah Kenward

National Manager, Petroleum
New Zealand Petroleum & Minerals
By email: contactNZPAM@mbie.govt.nz

20 November 2019

CONSULTATION ON BLOCK OFFER 2019 PROPOSAL

Tēnā koe Sarah,

1. On behalf of Te Kotahitanga o Te Atiawa Trust (the Trust) and Ngā Hapū o Te Atiawa Iwi (the Hapū) we provide this submission on New Zealand Petroleum and Minerals Block Offer 2019 Proposal (the Proposal).
2. The Trust and Hapū oppose the granting of the following blocks which reside within the rohe of Te Atiawa:
 - 174E39/1-2A;
 - 174E39/1-2B;
 - 174E39/2-1;
 - 174E38/32-3;
 - 174E39/2-4;
 - 174E39/8-1; and
 - 174E38/8-2.

Overview of Te Atiawa Position

3. Te Atiawa exercise manawhenua over the ancestral lands, waters, taonga species, wāhi tapu and wāhi taonga within the Te Atiawa rohe which extends from Te Rau o Te Huia along the coast to the Herekawe Stream, inland to Maunga Taranaki and offshore (see *Map 1*).
4. Te Atiawa has a range of rights and interests including, but not limited to:
 - a) rights and interests arising under the Te Atiawa Iwi Claims Settlement Act 2016 including the Relationship Agreement with the Ministry of Business, Innovation and Employment in Relation to Petroleum and Minerals;
 - b) rights and interests according to tikanga and customary law;
 - c) rights and interests arising from the common law (including the common law relating to aboriginal title and customary law); and
 - d) rights and interests under the Treaty of Waitangi and its principles.

5. Te Atiawa seek to ensure that these rights and interests are recognised in the Proposal and there is acknowledgement of and alignment with Te Atiawa's key tribal documents:
 - a) Te Atiawa Iwi Claims Settlement Act 2016; and
 - b) Te Atiawa Iwi Environmental Management Plan which is currently in draft.

Submission on Block Offer 2019 Proposal

6. The Trust and Hapū oppose the granting of the above blocks. The landscape within which the above blocks are located is rich in Te Atiawa history. This is evident by the sheer number of sites, rights and interests shown in *Maps 1-3*.
7. This Proposal has the potential to impact on these sites, rights and interests which include (see *Maps 1-3*):
 - a) The Statutory Acknowledgement areas and Statements of Association proving their cultural significance, as recognised in the above Act:
 - Herekawe Stream and its Tributaries;
 - Huatoki Stream and its Tributaries;
 - Kowhangamoku Stream and its Tributaries;
 - Manganui River and its Tributaries;
 - Mangati Stream and its Tributaries;
 - Manu Stream and its Tributaries;
 - Motukari Stream and its Tributaries;
 - Onaero River and its Tributaries;
 - Parahaki Stream and its Tributaries;
 - Tapuae Stream and its Tributaries;
 - Te Henui Stream and its Tributaries;
 - Waiau Stream and its Tributaries;
 - Waihi Stream and its Tributaries;
 - Waihowaka Stream and its Tributaries;
 - Waiongana Stream and its Tributaries;
 - Waiongana Stream Conservation Area;
 - Waipapa Stream and its Tributaries;
 - Waipu Stream and its Tributaries;
 - Waitaha Stream and its Tributaries;
 - Waitara River and its Tributaries;
 - Waitara West Marginal Strip;
 - Waiwhakaiho River Mouth (Crown Land Conservation Area); and
 - Waiwhakaiho River and its Tributaries.
 - b) New Zealand Archaeological Authority (NZAA) recorded wāhi tapu sites;
 - c) Operative New Plymouth District Plan (ONPDP) and Proposed New Plymouth District Plan (PNPDP) recorded wāhi taonga and sites of significance to Māori;
 - d) Te Atiawa wāhi tapu sites to be formally recorded;
 - e) Māori owned land; and
 - f) Native Reserves.

8. In addition, Blocks 174E39/1-2A, 74E39/1-2B, 174E39/2-1 and 174E38/32-3 form part of New Plymouth town district and are currently zoned residential in the Operative and Proposed New Plymouth District Plan.
9. In conclusion, the Trust and Hapū oppose this Proposal due to the potential impacts that it may have on Te Atiawa's sites, interests and rights. Furthermore, we request that enhanced iwi engagement occurs immediately to protect these areas of particular importance to Te Atiawa in accordance with *Obligation 9.1 (a),(b) and (c)* within the Relationship Agreement with the Ministry of Business, Innovation and Employment in Relation to Petroleum and Minerals (which forms part of the Te Atiawa Iwi Claims Settlement Act 2016).
10. In addition, the Trust and Hapū request that the first Annual Forum and first Annual Block Offer Round Meeting take place in accordance with obligations within the Relationship Agreement with the Ministry of Business, Innovation and Employment in Relation to Petroleum and Minerals.

On behalf of the Trust and Hapū, Hemi Sundgren has been appointed as the Relationship Manager for this Relationship Agreement. His details are provided below to the Ministry's Relationship Manager for arranging these meetings.

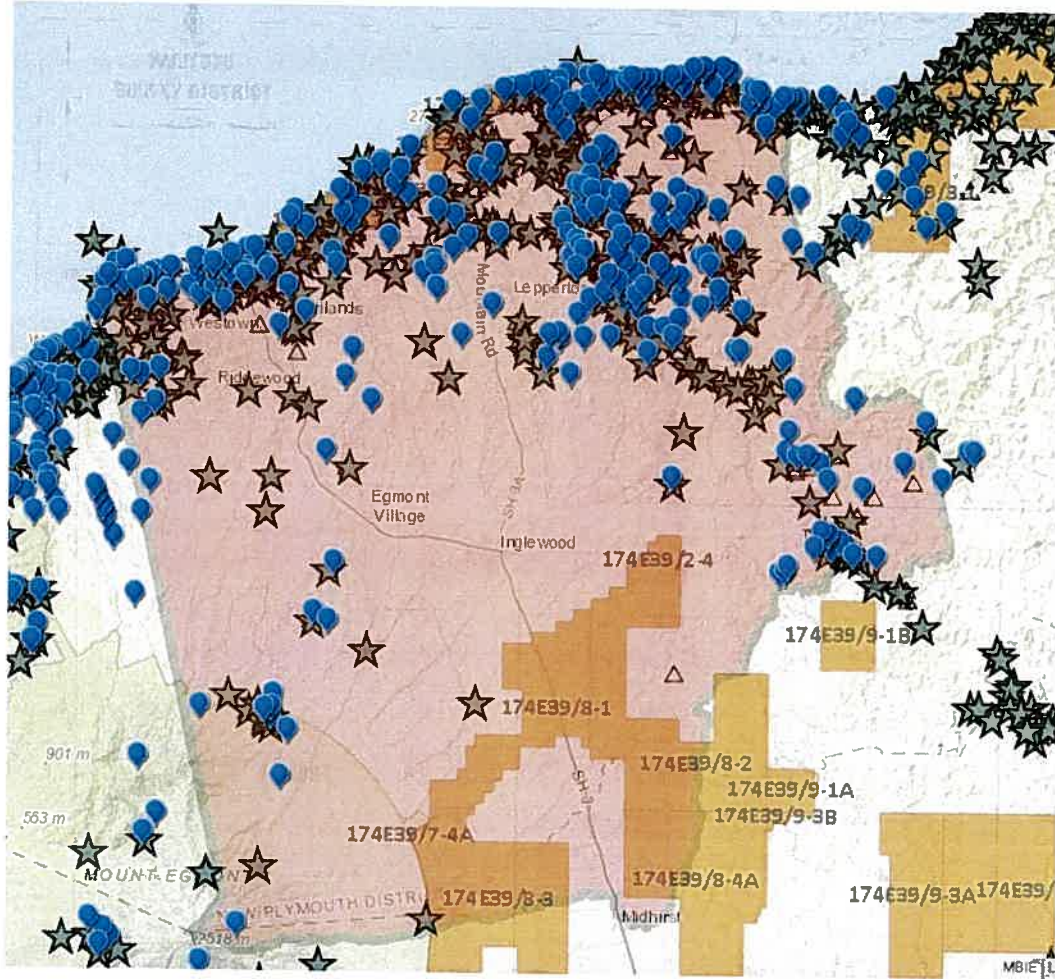
11. The Trust and Hapū look forward to hearing from you. If you have any questions please contact Sarah Mako at sarah@teatiawa.iwi.nz.

Nāku, nā

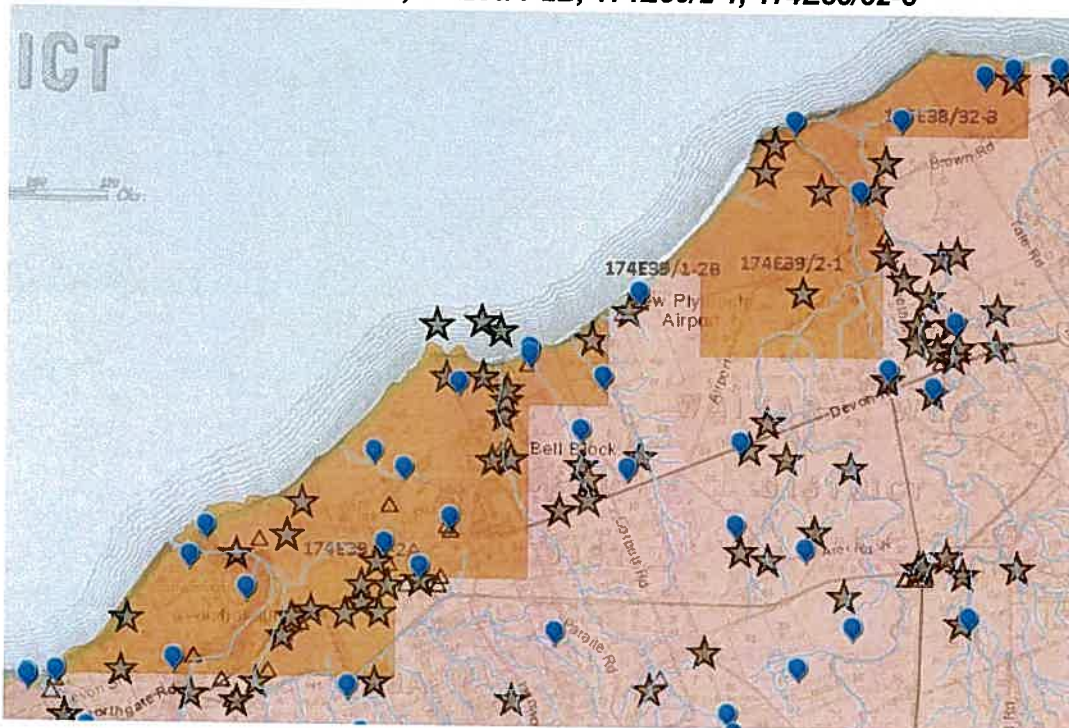


Hemi Sundgren
Pouwhakahaere / Chief Executive
Te Kotahitanga o Te Atiawa Trust
Email: tari@teatiawa.iwi.nz

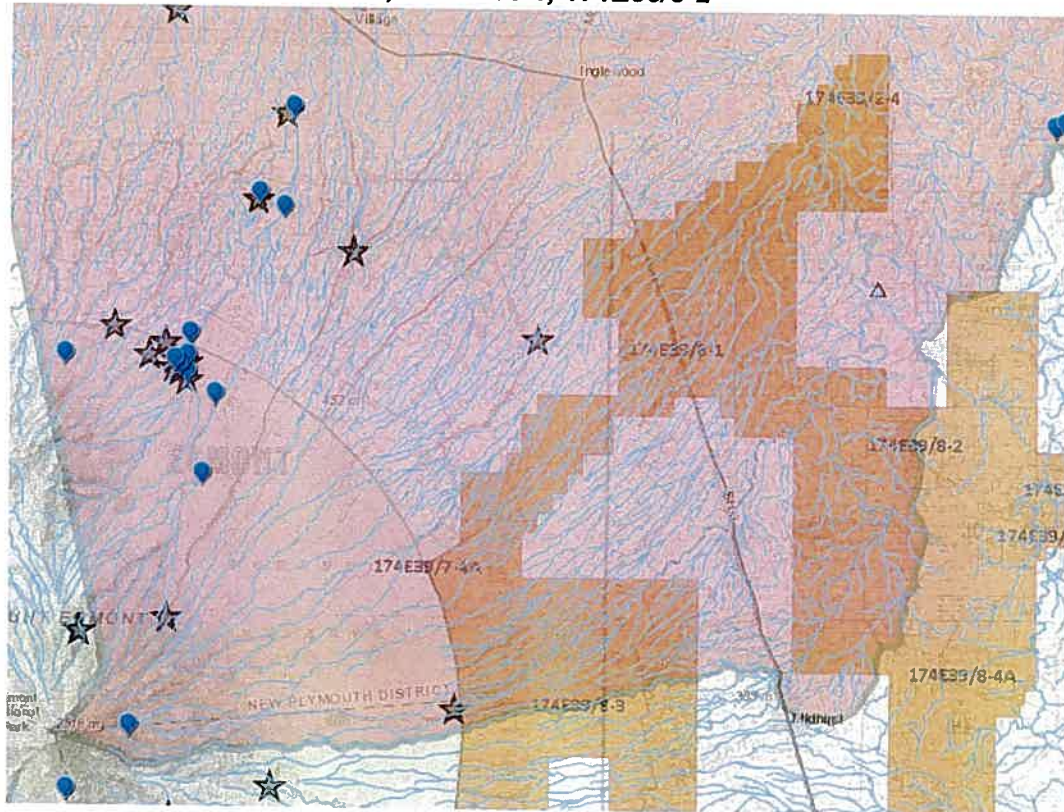
Map 1 – Overview of Blocks within Te Atiawa Rohe



Map 2 – Blocks 174E39/1-2A, 174E39/1-2B, 174E39/2-1, 174E38/32-3



Map 3 – Blocks 174E39/2-4, 174E39/8-1, 174E38/8-2



TE RUNANGA O NGATI RUANUI TRUST

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20 November 2019

Sarah Kenward
National Manager Petroleum and Minerals
New Zealand Petroleum and Minerals
PO Box 1473
WELLINGTON 6140

Via Email: nzpam@mbie.govt.nz

Tena koe Sarah,

RE: Block Offer 2019

Thank you for providing the details of the government's 2019 proposal to offer "onshore" blocks for petroleum and minerals exploration.

Te Runanga o Ngati Ruanui Trust (Ngati Ruanui) is the mandated voice for the members of the 16 hapu. The takiwa (tribal region) of Ngati Ruanui is bounded by the Whenuakura River in the south, the Waingongoro River in the north, the coastline between these rivers to the west and the Matemateonga Ranges to the east.

Ngati Ruanui's takiwa continues to have the most active petroleum industry in the country ranging from prospecting, exploration and mining activities; including full production facilities. Given this activity Ngati Ruanui has a comprehensive understanding of the issues which arise, including potential and actual impacts of the petroleum industry.

The Block Offer process has been operating for a number of years now and we believe it is time to significantly review the approach; especially given the same blocks are largely being recycled in the same form. Given the Government's position with banning offshore exploration permits a more targeted exploration approach for onshore, part of the overall move to a Carbon Neutral economy, is now needed. To this end Ngati Ruanui will not endorse the Block Offer approach into the future.

As in previous years we are hopeful that this block offer will continue to raise standards and only the most suitable companies are given rights to search for and use our natural resources. Any evaluation should determine a company's credentials against their ability to actively engage and involve iwi in the activities they wish to undertake.

Having considered the blocks being offered within our takiwa, Ngati Ruanui as kaitiaki, wish to ensure that adequate protection is not only given to our environment and the life forms found within it but to also ensure that enshrined customary rights are protected as well. This said our recommendations effectively remain the same as requested by our iwi in the past. Ngati Ruanui therefore seeks the following conditions:

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Ngati Ruanui seeks the following land exclusions from the blocks where they may be impacted:

1. Land within 20 metres of the Tangahoe, Patea and Whenuakura Awa (Rivers). The Tangahoe, Patea and Whenuakura Awa are Statutory Acknowledgement Areas under the Ngati Ruanui Claims Settlement Act 2003. Further, the Tangahoe, Patea and Whenuakura Awa are specifically recognised catchments in the Ngati Ruanui Environmental Management Plan (Section 2 Resource Management Act 1991). Ngati Ruanui considers that it is inappropriate for any petroleum exploration to occur close to our Awa.
2. Land within 50 metres of our Marae sites. Referral to Te Runanga o Ngati Ruanui is considered the most practical way for the successful company to identify the location of such sites when exploration activities occur. This is not a protection that is afforded to Ngati Ruanui through the Resource Management Act and resulting local government District Plan.
3. Identified Urupa sites. While these sites are likely to be small in number, acknowledgement of such sites is deemed important for exclusion given their historical and cultural sensitivity to hapu and whanau. Referral to Te Runanga o Ngati Ruanui is considered the most practical way for the successful company to identify such sites when exploration activities occur. No protection is afforded to these sites under the South Taranaki District Plan.
4. Any area, regardless of land title boundaries, of native vegetation 1 ha or greater, where that vegetation is 3 metres or greater in height. The loss of native vegetation within the Taranaki Region is significant. The protection and enhancement of biodiversity is a significant policy feature of the Ngati Ruanui Environmental Plan. It is noted that native vegetation is often not afforded any adequate protection under regional or district plans and therefore does not automatically sit within the Resources Management Act considerations.

The competitive block offer and the ability for iwi to engage about areas and boundaries is a new and further step in strengthening the partnership between the Crown and Iwi. Ngati Ruanui therefore suggests the following condition to complement the above:

1. That any exploration activity that occurs within 100 metres of the Tangahoe, Whenuakura and Patea Awa are referred by the successful company to Ngati Ruanui for comment. Ngati Ruanui will provide comment within 20 working days of notification. *(This specific referral does not affect any process or engagement through the Resource Management Act 1991).* This referral will ensure the Statutory Acknowledgement Area is adequately recognised and our unique role of Kaitiakitanga is enduring through the exploration permit process, especially during a site selection process for exploration activities.

We note that this above condition has been granted under previous Block Offer and our expectation is that this will continue.

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This submission provides a clear and practical set of changes/exclusions which recognise the importance of recognised resources that are important to Ngati Ruanui.

Te Runanga o Ngati Ruanui would be pleased to discuss this letter further. We look forward to your positive response.

Ngā mihi,

A handwritten signature in blue ink, appearing to be 'Debbie Packer', with a long, sweeping tail.

Debbie Packer
Kaiarataki

Josh Adams
National Manager Petroleum
New Zealand Petroleum & Minerals
By email: mark.ormsby@mbie.govt.nz,

19 November 2019



NEW ZEALAND PETROLEUM & MINERALS - BLOCK OFFER 2019 Proposal

Tēnā koe,

Te Rūnanga o Ngāti Mutunga wish to make the following submission on the 2019 Block Offer:

Interest in area: (please see attached map)

A large proportion of the northern most section of the 2019 block offer lies within the Ngati Mutunga rohe. The Te Rūnanga o Ngati Mutunga interest has been formally recognized by the Crown in the Ngāti Mutunga Deed of Settlement (2005) which identifies our cultural, spiritual, historical and traditional association with the whenua and takutai moana extending from the Papatiki stream in the north to the Waiau stream in the south, inland to the Waitara River.

The Deed of Settlement also recognized the following Statutory Acknowledgement areas that are within the Block offer area:

- Part Mimi-Pukearuhe Coast Marginal Strip
- Waitoetoe Beach Recreation Reserve
- Mimi Scenic Reserve
- Mimi Gorge Scientific Reserve
- Urenui River Marginal Strip
- Urenui River Mimi River within the Ngati Mutunga Area of Interest

Te Rūnanga o Ngāti Mutunga wish to oppose the inclusion of this portion of the 2019 Block offer for the following reasons:

1) Conflict with the Ngāti Mutunga iwi Environmental Management Plan

As stated in the Ngāti Mutunga Iwi Environmental Management Plan, Te Rūnanga o Ngāti Mutunga asserts its rights of ownership to any minerals found within the iwi rohe boundary.

The specific objective of this policy is:

“To assert ownership of hydrocarbon and mineral resources in the rohe and ensure that Ngāti Mutunga is involved at all levels in any current or future prospecting exercises” p 37 Ngāti Mutunga Iwi Environmental Management Plan

Te Rūnanga o Ngāti Mutunga sees that the inclusion of this area in the 2019 Block offer is in conflict with this policy and objective.

2) Negative impact on sites of cultural importance of Ngāti Mutunga

The historical and cultural significance of Ngāti Mutunga area of interest within the block offer is reflected in the high number of waahi tapu sites that are located here.

These sites have been identified, located and mapped by Te Rūnanga o Ngāti Mutunga for inclusion in the New Plymouth Council District Plan – these sites have been notified by the New Plymouth District Plan in September 2019 and are now operative sites.

We have attached maps showing the general location of all these sites and also a copy of Schedule 5B of the Taranaki Regional Council Coastal Plan which lists the Sites of significance to Ngāti Mutunga and the associated values that come under this plan which has now become operative

The sites included in the block offer area include:

- Over 70 pā, māra/garden, kainga and ruapara/midden sites
- Waahi tapu sites used for ceremonies – including urupā (4 of these sites are still in use), cremation, tohi/baptisms, healing and blessing
- 8 Tauranga waka/ika
- Tupuna awa - the block area covers the following Ngāti Mutunga tupuna awa: Urenui, Mimitangiatua, Waitoetoe, Wai-iti and Papatiki and their associated mahinga kai and resource gathering sites.

If the block offer were to be granted we would want the specific sites listed below to be excluded from the permit area and exclusion zones of a minimum of 200 m around them to be established. These are:

- All Statutory Acknowledgement Areas that are within the Block offer Area
- All Waahi Taonga sites as identified on the draft NPDC District Plan
- All sites of significance included in the Draft Taranaki Regional Council Coastal Plan which was notified early this year (the sites are listed in Schedule 5 of the Coastal Plan and we have attached a copy)
- Urenui Pā Reserve
- Tupuna awa – not covered in the Statutory Acknowledgement areas – namely Wai-iti Stream
Papatiki stream and Waitoetoe River

We would also ask that NZ Petroleum and Minerals make any Block Offer applicants aware of their legal responsibility (under the Resource Management Act 1991 and Heritage New Zealand Pouhere Taonga Act 2014) to protect these sites from any damage their activities may cause.

Te Rūnanga o Ngāti Mutunga welcome the opportunity to meet with New Zealand Petroleum and Minerals to discuss the matters raised in this submission.

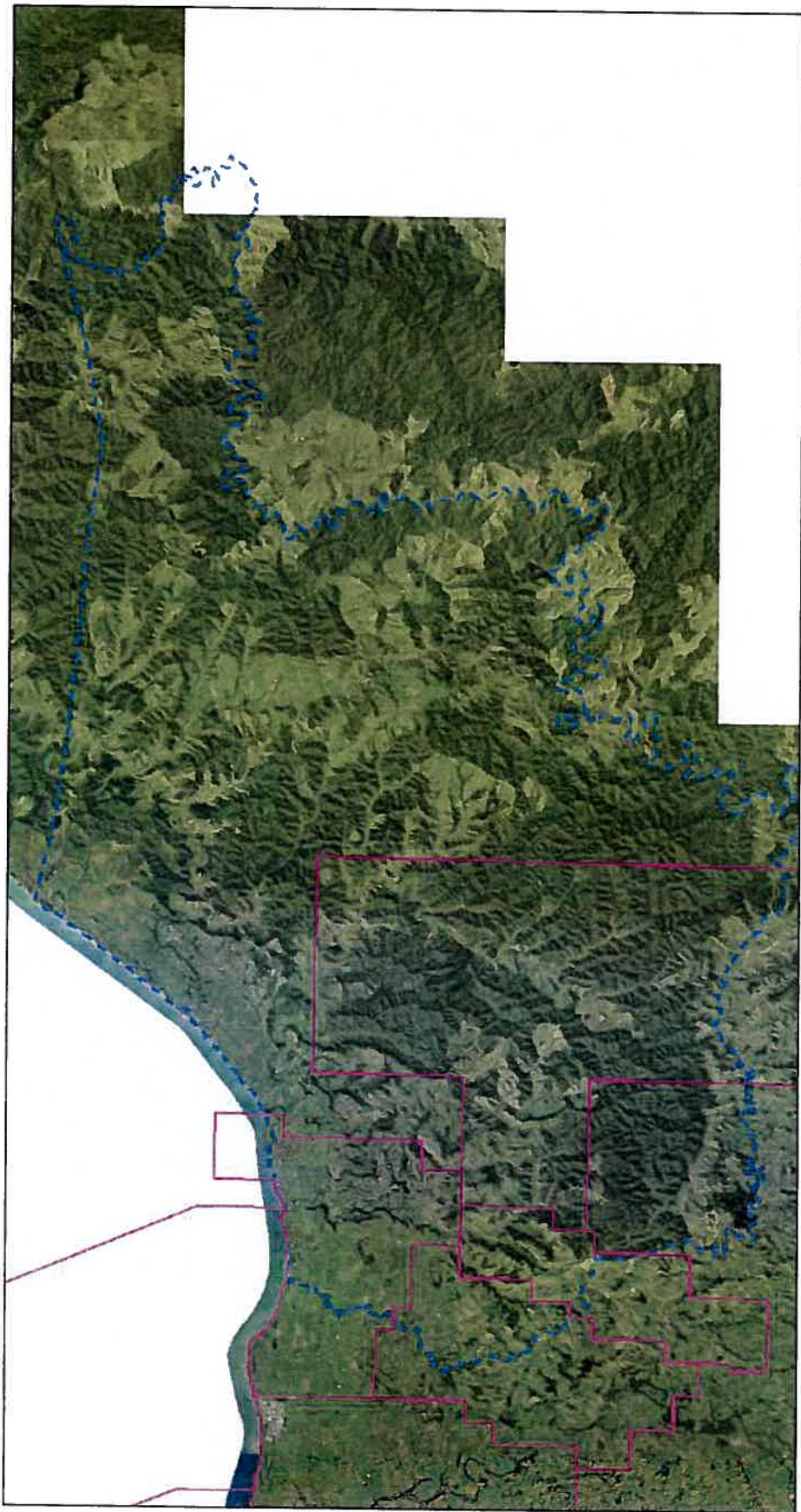
We do not wish the information in this submission that describes or locates our waahi tapu to be included in the information that is published on the NZP&M website.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'Paul Cummings', with a stylized flourish at the end.

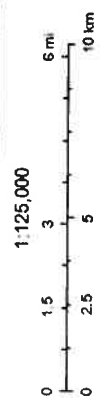
Paul Cummings
Pouwhakahaere/CEO

Ngāti Mutunga Area of Interest in the 2019 Block Offer



11/19/2019, 7:46:16 AM

-  Petroleum Permits
-  Updated Ngāti Mutunga Rohe Boundary



NPDC