

**The Māori Trustee's submission on  
Kia āhuarangi rite a Aotearoa/  
Te mahere urutaunga ā-motu  
(tuhinga hukihuki)  
Discussion Documents**

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[tetumupaeroa.co.nz](http://tetumupaeroa.co.nz)

[contact@tetumupaeroa.co.nz](mailto:contact@tetumupaeroa.co.nz)

0800 WHENUA (0800 943 682)



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## Summary of Position

1. The Māori Trustee administers, as trustee or agent, nearly 90,000ha of Māori freehold land on behalf of approximately 100,000 individual Māori landowners. Te Tumu Paeroa is the organisation that supports the Māori Trustee to carry out her functions, roles and responsibilities. Detailed information regarding the Māori Trustee and Te Tumu Paeroa is set out in Appendix 1. Additional information can be found on Te Tumu Paeroa's website, [www.tetumupaeroa.co.nz](http://www.tetumupaeroa.co.nz).
2. The Māori Trustee supports a proactive and comprehensive response to climate related risks and events as proposed in the draft National Adaptation Plan. However, the Māori Trustee acknowledges that for the objectives and outcomes in the draft National Adaptation Plan to be realised, the implementation of a cohesive cross-governmental and whole of society approach will be critical.
3. As the Māori Trustee administers significant tranches of Māori land on behalf of over 100,000 Māori land owners, it can be appreciated that due to the scale and varied nature of our portfolio, formulating an appropriate response that is reflective of all our ownership interests and land use capabilities within the submission timeframe is not possible. The Māori Trustee therefore emphasises that the points expressed in the following submission are not representative of the views of individual Māori landowners but from her position as the single largest trustee and agent of Māori land in Aotearoa.
4. The Māori Trustee summarises her submission as follows:
  - a. The Māori Trustee considers that the government needs to be cognisant of Māori communities, iwi, hapū and entities when undertaking consultation to ensure that the appropriate people, at the appropriate level, are being engaged.
  - b. The Māori Trustee disagrees with how some of the risks have been prioritised and notated under the National Climate Change Risk Assessment and provides recommendations for amendments in paragraphs 8 and 9.
  - c. The Māori Trustee supports many aspects of the proposals presented in this draft National Adaptation Plan but notes that its success will be reliant on how it is implemented.
  - d. The Māori Trustee considers that key learnings and reports from all the proposed strategies and actions listed in the document need to be made publicly available in a digestible format and on a singular platform.
  - e. The Māori Trustee supports Māori (iwi/hapū/whānau/Māori landowners) being involved at all levels of planning to ensure decisions made are in the best interest of their



whenua, cultural heritage, assets and taonga and they are able to exercise their tino rangatiratanga.

- f. The Māori Trustee advocates for a collaborative approach with regards to identifying and addressing impacts on whenua Māori in the development and implementation of the National Adaptation Plan and managed retreat process. The Māori Trustee supports decisions that prioritise the health of the whenua as articulated in the whakataukī, *Ka ora te whenua, ka ora te tangata. When the whenua is healthy so are the people.*
- g. The Māori Trustee considers the lack of targeted funding and the inherent difficulties with lending, servicing debt, developing and the governance of Māori land to be the prevailing barriers that limit Māori landowners from increasing the climate resilience of their whenua and assets. Over 16,000 Māori land blocks in Aotearoa do not have a governance structure<sup>1</sup> and for those that do, the vast majority often earn very modest incomes. For example, 73% of blocks administered in the Māori Trustee's portfolio generate less than \$10,000 revenue per annum and 58% generate less than \$5,000. For approximately 30% of our Māori landowning entities, meeting base administration costs and rates bills is already entirely or partially prohibitive and this number will only increase as the costs to meet compliance for new local and central government environmental regulations rises. The reality for many Māori landowning entities is that they simply do not have the financial reserves to become climate resilient. The Māori Trustee therefore advocates for solutions to be developed, including targeted funding, to address these barriers.
- h. The Māori Trustee considers that a mechanism should be developed that allows landowners to create and submit their own risk management plans when council's hazard planning/mapping is not evidentially reflective of what happens on the whenua. This will enable Māori landowners to increase their ability to remain/become climate resilient without unreasonable restrictions limiting their sustainable land use and development opportunities.
- i. The Māori Trustee considers that the following whakataukī should be included to guide the principles and objectives of managed retreat: *Ka mate kāinga tahi, ka ora kāinga rua. When the first home dies, a second home comes to life.*
- j. The Māori Trustee considers a process needs to be developed to deal with the matter of who will own the land that is retreated from in the managed retreat process. The Māori Trustee strongly advocates for co-governance decisions to be made on this matter.
- k. The Māori Trustee considers a process that shows where land, if needed, for retreat will come from. The process will need to acknowledge tribal connections, particularly with regards to whenua Māori to ensure land is not inappropriately gifted or exchanged in

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<sup>1</sup> <https://maorilandcourt.govt.nz/assets/Documents/Publications/Maori-Land-Update-2021-ver-1.pdf>, p. 1.



areas that the landowners share no whakapapa with. The Māori Trustee suggests that the government looks to avoid past examples like Wairarapa Moana Trust/Mangakino and the South Island Landless Natives Act.

- I. The Māori Trustee considers a co-governance structure will be fundamental in the development of a managed retreat system for iwi/hapū/Māori.
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5. The Māori Trustee would welcome the opportunity to discuss her submission with staff from the Ministry for the Environment.



## General Submissions

### Engagement

6. The Māori Trustee considers that the government needs to be cognisant of Māori communities, iwi, hapū and entities when undertaking consultation to ensure that the appropriate people, at the appropriate level, are being engaged. Similar to an organisation te iwi Māori, as a people, are made up of layers: Iwi, hapū and Māori landowners. In terms of whenua Māori:
  - **Iwi** tend to have a high-level of oversight and a broad depth of knowledge
  - **Hapū** tend to have a more detailed understanding of the whenua as this is where the owners of the land blocks are
  - **Māori landowners** 83% of whenua Māori is vested in landowning entities<sup>2</sup> that have their own individual governance teams who, together with advisors and engaged owners, are well placed to speak on direct impacts on their whenua.
7. The current resource management system does not require central and local government to directly consult with Māori landowners and therefore the level of detail Māori landowners hold regarding their whenua is often overlooked and not reflected in policy. The Māori Trustee considers that to ensure central and local government engage with all Māori stakeholders across all reforms, Māori landowners need to be included under the definition of tangata whenua in the current and reformed resource management system.

### Prioritisation of climate risks under the National Climate Change Risk Assessment

8. The Māori Trustee understands that the first National Adaptation Plan will focus on addressing the 43 priority risks identified as part of the National Climate Change Risk Assessment over the next six years. As part of this assessment, 10 of the most significant risks<sup>3</sup> were identified as needing urgent action. Each priority risk was also notated with whether or not it was consider to be “of particular significance to Māori” or had “disproportionate impacts on Māori”. The Māori Trustee disagrees with how some of the risks have been prioritised and notated and suggests that the following amendments need to be made:
  - a. Priority risk G4 be elevated to be part of the most significant risks;
  - b. Priority risk N2 should be noted as being “of particular significance to Māori” and as having “disproportionate impacts on Māori”;
  - c. All priority risks that are noted as being “of particular significance to Māori” should also be noted as having “disproportionate impacts on Māori” and vice versa.
9. The Māori Trustee also considers that the decisions matrix for categorising the priority risks and who was involved should be made available in a clearer and more digestible format.

<sup>2</sup> <https://maorilandcourt.govt.nz/assets/Documents/Publications/Maori-Land-Update-2021-ver-1.pdf>, p. 1.

<sup>3</sup> Te Mahere urutaunga ā-motu (tuhinga hukihuki), p. 120



## Specific Submissions

### Discussion Document Question Table

Section	Question	Submission
General Questions	<p>1. Climate change is already impacting New Zealanders. Some examples include extreme weather events such as storms, heatwaves and heavy rainfall which affects lives, livelihoods, health and wellbeing, ecosystems and species, economic, social and cultural assets, services (including ecosystem services) and infrastructure. How is climate change impacting you? This could be within your community and/or hapū and iwi, and/or your business/organisation, and/or your region.</p>	<p>The Māori Trustee considers that the effects of climate change will have a direct and diverse impact on the extensive landholdings (see below) she administers across Aotearoa. Based on the Māori Trustee’s experience whenua Māori and Māori landowners will likely struggle to become climate resilient unless appropriate action is taken to address the historic and structural barriers that continue to exacerbate inequities. The Māori Trustee therefore emphasises the need for the Government to be cognisant of these barriers placed on Māori land and Māori landowners when continuing to develop the National Adaptation Plan.</p> <p>The Māori Trustee is supportive of proactive action against climate change and the development of the National Adaptation Plan. However, for Te Tumu Paeroa to meaningfully engage with the over 100,000 individual Māori landowners on these important issues, outside of the mahi we already do, will require the Government to provide appropriate resourcing and timeframes to complete such a task.</p> <p><b>Portfolio</b></p> <p>Presently, the Māori Trustee’s portfolio administers nearly 90,000ha of whenua, with approximately 1,800 trusts that represent over 100,000 individual Māori landowners. The average land size is roughly 50ha with 52% of our actively managed leases (1,705) being utilised for pastoral purposes, 20% for dairy, 7% for forestry, 11% horticulture/cropping and 10% other uses (commercial, residential, access, unutilised).</p> <p>The Māori Trustee has identified approximately 75% (1,571 trusts, 67,472ha) of her portfolio to be located within low-lying<sup>4</sup> areas and within 1km of a waterbody. Furthermore, approximately 16% (262 trusts, 14,485ha) of her portfolio is situated within 500m of the coastline. The Māori Trustee notes that 27% of these coastal blocks are located within the Gisborne region, which typically receive minimal rental returns.</p>
	<p>2. The national adaptation plan focuses on three key areas. Please indicate which area is most important to you (tick box).</p> <p><input type="checkbox"/> focus area one: reform institutions to be fit for a changing climate. This means updating the legislative settings so that those who are responsible for preparing for and reducing exposure to changing climate risk will be better equipped.</p> <p><input checked="" type="checkbox"/> focus area two: provide data, information and guidance to enable everyone to assess and reduce their own climate risks. This means that all New Zealanders will have access to information about the climate risks that are relevant to them.</p>	<p>The Māori Trustee considers focus areas two and three to be the most important in ensuring whenua Māori and Māori landowners are adept, equipped and guided by consistent policy to enable them to become climate resilient through the National Adaptation Plan.</p> <p>However, the Māori Trustee does acknowledge that the implementation of all focus areas will be important to achieving the proposed objectives and outcomes in the National Adaptation Plan.</p>

<sup>4</sup> Blocks that have been identified as low-slope or 5-10degrees: <https://data.mfe.govt.nz/layer/105877-stock-exclusion-low-slope-land-2021-proposal-nz/>



	<p><input checked="" type="checkbox"/> focus area three: embed climate resilience across government strategies and policies. This means that Government agencies will be considering climate risks in their strategies and proposals.</p> <p><input type="checkbox"/> other? Please explain.</p>	
	<p>3. We all have a role to play in building resilience to climate change, but some New Zealanders may be more affected and less able to respond. There is a risk that climate change could exacerbate existing inequities for different groups in society. Appendix 3 sets out the full list of actions in this national adaptation plan.</p> <p>a) What are the key actions that are essential to help you adapt? Please list them.</p> <p>b) Which actions do you consider to be most urgent? Please list them.</p> <p>c) Are there any actions that would help ensure that existing inequities are not exacerbated? Please list them.</p> <p>d) Are there any actions not included in this draft national adaptation plan that would enable you to assess your risk and help you adapt?</p>	<p>The Māori Trustee cautions that due to the short consultation and submission period, Te Tumu Paeroa was unable to complete a comprehensive assessment on how individual actions listed in the discussion documents will impact our portfolio. Therefore, the responses below are by no means exhaustive. The Māori Trustee has also not listed current actions in the below responses as she has assumed that they are already considered urgent as they have funding, clear scope and mandate. The Māori Trustee has therefore focused her attention on proposed actions that she considers should be progressed into a current work programme.</p> <p>The Māori Trustee considers that the most effective and efficient way of understanding the impacts of actions on whenua Māori and Māori landowners requires direct and meaningful consultation. The Māori Trustee can only speak to the whenua she administers but requests that a direct meeting be set up between the appropriate government departments and Te Tumu Paeroa.</p> <p>a) No comment.</p> <p>b) The Māori Trustee has identified the following actions to be urgent:</p> <ul style="list-style-type: none"> <li>• Deliver a rolling programme of targeted guidance;</li> <li>• Produce new tools and guidance specific to mātauranga Māori and mātauranga indicators;</li> <li>• Produce guidance and tools for monitoring and evaluating the impact of adaptation initiatives;</li> <li>• Produce an adaptation professional development programme for key practitioners;</li> <li>• Establish an integrated work programme to deliver climate, biodiversity and wider environmental outcomes;</li> <li>• Develop mātauranga Māori indicators of climate impacts on the natural environment;</li> <li>• Partner with Māori land owners to increase the resilience of Māori-owned land, homes and cultural sites;</li> <li>• Expand current funding for proactive community resilience;</li> <li>• Support Māori small business resilience and transitions;</li> <li>• Deliver the Māori agribusiness extension;</li> <li>• Research business adaptation preparedness &amp; provide guidance for small businesses to adapt;</li> <li>• Promote more industry partnership networks;</li> <li>• Identify the impacts of climate change on regional economies.</li> </ul> <p>c) The Māori Trustee has identified the following actions as being necessary to ensure existing inequities are not exacerbated:</p> <ul style="list-style-type: none"> <li>• Develop 3D coastal mapping;</li> <li>• Produce new tools and guidance specific to mātauranga Māori and mātauranga indicators;</li> <li>• Develop mātauranga Māori indicators of climate impacts on the natural environment;</li> </ul>





		<ul style="list-style-type: none"> <li>• Partner with Māori land owners to increase the resilience of Māori-owned land, homes and cultural sites;</li> <li>• Develop a framework for assessing exposure and vulnerability of cultural assets/taonga to climate change;</li> <li>• Expand current funding for proactive community resilience;</li> <li>• Support Māori small business resilience and transitions;</li> <li>• Deliver the Māori agribusiness extension;</li> <li>• Establish innovation grants, such as project grants;</li> <li>• Promote more industry partnership networks;</li> <li>• Identify the impacts of climate change on regional economies.</li> </ul> <p>d) The Māori Trustee considers that the following action needs to be included in the draft National Adaptation Plan to enable Māori landowners to assess their risk and help them adapt:</p> <ul style="list-style-type: none"> <li>• Develop Regional Climate Migration Action Plans</li> </ul>
	<p>4. Central government cannot bear all the risks and costs of adaptation. What role do you think asset owners, banks and insurers, the private sector, local government and central government should play in:</p> <p>a) Improving resilience to the future impacts of climate change?</p> <p>b) Sharing the costs of adaptation?</p>	<p>a) The Māori Trustee considers that improving resilience to the future impacts of climate change will require a collaborative approach and therefore all parties involved should have an equitable stake. The Māori Trustee also considers that central and local government will need to provide funding assistance to ensure those who will struggle to adapt have the means to become climate resilient. To ensure funding is equitable and being targeted in the right areas, criteria should not be based on first-come-first-served.</p> <p>b) The Māori Trustee supports an equitable sharing of costs for adaptation purposes. The sharing of costs should acknowledge:</p> <ul style="list-style-type: none"> <li>• The historic barriers and inherent complexities of Māori land.</li> <li>• Ki uta ki tai – the interconnectivity of all things. Those who are being adversely effected due to the activities of someone else should not bear the brunt of those costs.</li> <li>• Funding needs to be made available and should not be based on the principle of first-come-first-served.</li> <li>• Farming infrastructure and buildings are not generally covered by insurance and therefore a reliance on government funding will be present post-disaster.</li> </ul>
	<p>5. The National Climate Change Risk Assessment recognised that there may be economic opportunities in adapting to a changing climate.</p> <p>a) What opportunities do you think could exist for your community or sector?</p> <p>b) What role could central government play in harnessing those opportunities?</p>	<p>a) The Māori Trustee considers alternative land use options may arise and present new economic opportunities for our portfolio.</p> <p>b) The Māori Trustee considers that central government could utilise catchment groups to provide a feedback loop and information sharing hub. Catchments groups, with their networks, provide a valuable source of information and have the ability to distribute climate change data to ensure consistency across their regions. Catchment groups will also be able to recognise and provide feedback on new economic opportunities in their regions.</p> <p>The Māori Trustee also considers that central government should make funds available to conduct feasibility studies.</p>
<p><b>System-wide actions (p.25)</b></p>	<p>6. Do you agree with the objectives in this chapter?</p>	<p>The Māori Trustee supports the objectives in this chapter, including objective 2 “Robust information about climate risks and adaption solutions is accessible to all”.</p>



<p> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Partially                  Please explain your answer.             </p>	<p>The Māori Trustee considers there is a need to look at appropriate ways to address data sovereignty issues, recognising there may be a need to:</p> <ul style="list-style-type: none"> <li>lock data (restrict access) in certain situations; or</li> <li>aggregate/average data, to ensure individual data sources are not compromised.</li> </ul> <p>The Māori Trustee strongly supports:</p> <ul style="list-style-type: none"> <li>Critical action: <i>Design and develop an Adaption Information Portal</i>, which will include a focus on mātauranga Māori; and</li> <li>Supporting action: <i>Establish a foundation to work with Māori on climate actions</i></li> </ul> <p>This will ensure that Te Ao Māori perspectives and mātauranga Māori are appropriately reflected in policies and actions.</p>
<p>7. What else should guide the whole-of-government approach to help New Zealand adapt and build resilience to a changing climate?</p>	<p>The Māori Trustee considers that a ‘whole-of-society approach’ should be guiding Aotearoa’s approach to adapt and build resilience to a changing climate as described in the Rauora framework:</p> <p>“Because climate change affects all aspects of society, so too does climate adaption require a whole of society approach, with engagement and contributions from all levels of government, private and public institutions and organizations, and across multiple sectors”<sup>5</sup></p>
<p>8. Do you agree that the new tools, guidance and methodologies set out in this chapter will be useful for you, your community and/or iwi and hapū, business or organisation to assess climate risks and plan for adaptation?</p> <p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially                  Please explain your answer.             </p>	<p>The Māori Trustee strongly supports the “supporting action”: <i>Establish a foundation to work with Māori on climate actions</i>, particularly that <i>“A platform will be developed to be a foundation for an equitable transition for Māori”</i>.</p>
<p>9. Are there other actions central government should consider to:</p> <p>a) Enable you to access and understand the information you need to adapt to climate change?</p> <p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.             </p> <p>b) Provide further tools, guidance and methodologies to assist you to adapt to climate change?</p> <p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.             </p> <p>c) Remove barriers to greater investment in climate resilience?</p>	<p>The Māori Trustee considers that successful implementation of the actions is key. Māori landowners need to be involved with development of strategies and the plans to take action. Māori landowners also need to be involved in risk management and identification to ensure hazard mapping reflects reality. It is important that information is not viewed in silos.</p> <p>There is a need to provide funding for Māori landowners to enable actions.</p>

<https://environment.govt.nz/publications/exploring-an-indigenous-worldview-framework-for-the-national-climate-change-adaptation-plan/>, p. 16



<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>d) Support local planning and risk reduction measures while the resource management and emergency management system reforms progress?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	
<p>10. What actions do you think will have the most widespread and long-term benefit for New Zealand?</p>	<p>The Māori Trustee considers that the proposal to prepare a National Adaptation Plan and the intention to provide more collaboration in terms of making Aotearoa climate resilient will be beneficial to all New Zealanders. The successful implementation of all the current and proposed actions will be the critical to the plan’s success.</p> <p>The Māori Trustee particularly supports the action to “design and develop an adaptation information portal” and its intention to include mātauranga Māori where appropriate.</p> <p>The Māori Trustee considers there is a need to look at appropriate ways to address data sovereignty issues, recognising there may be a need to:</p> <ul style="list-style-type: none"> <li>• lock data (restrict access) in certain situations; or</li> <li>• aggregate/average data, to ensure individual data sources are not compromised.</li> </ul>
<p>11. Are there additional actions that would strengthen climate resilience?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>The Māori Trustee considers that it is important that Māori landowners be directly involved with planning for climate resilience actions. The Māori Trustee also considers that catchment groups should be utilised as a way to get information out to impacted parties.</p>
<p>12. There are several Government reform programmes underway that can address some barriers to adaptation, including Resource Management (RM) reform. Are there any additional actions that we could include in the national adaptation plan that would help to address barriers in the short-term before we transition to a new resource management system?</p>	<p>The Māori Trustee considers that:</p> <ul style="list-style-type: none"> <li>• Early, direct and meaningful consultation with Māori landowners is critical to avoid exacerbating existing barriers in new and reformed policy. This is particularly important as these are very complex issues that require a lot of comprehension.</li> <li>• Connection with the primary industries and businesses is very important.                         <ul style="list-style-type: none"> <li>○ He Waka Eke Noa is a great example of direct consultation.</li> </ul> </li> </ul> <p>The Māori Trustee advises that the majority of the owners of land managed by the Māori Trustee are not on the land, therefore, comprehending and applying the reforms to whenua adds another layer of complexity, when the owners are removed from seeing the everyday impacts.</p>
<p>13. In addition to clarifying roles and providing data, information, tools and guidance, how can central government unlock greater investment in resilience?</p> <p>a) Would a taxonomy of ‘green activities’ for New Zealand help to unlock investment in resilience?  <input type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<p>a) The Māori Trustee is unclear what a taxonomy of ‘green activities’ would include, or how they would be implemented. It is important that there is transparency of what the actions are and what they do to ensure activities are actually green and not green-washed.</p>



	<input checked="" type="checkbox"/> Unsure Please explain your answer.	
<p><b>The natural environment</b></p>	14. Do you agree with the actions set out in this chapter? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Please explain your answer.	<p>The Māori Trustee particularly supports the action: “Develop mātauranga Māori indicators of climate impacts on the natural environment.</p> <p>The Māori Trustee agrees that mātauranga Māori indicators will enable monitoring and evaluation of climate impacts on biodiversity, mahinga kai, flora, fauna and human health. This will create data baselines that centralise indigenous knowledge and values and can be used in environmental assessments.</p>
	15. What else should guide central government’s actions to address risks to the natural environment from a changing climate?	<p>The Māori Trustee considers there is a need to provide key learnings on all the strategies and actions suggested in the discussion document as part of this process. As the proposed strategies and actions are undertaken by different lead agencies, it is critical that these learnings are made available on a singular platform and in an easily digestible format. This will ensure confidence that everyone is on the same page and the strategies/actions are working together to achieve the proposed outcomes and objectives.</p>
	16. Are there other actions central government should consider to:  a) Support you, your community, iwi and hapū, business and/or organisation to build the natural environment’s climate resilience? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Please explain your answer.  b) Strengthen biosecurity in the face of climate change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Please explain your answer.  c) Identify and support New Zealand’s most vulnerable ecosystems and species in a changing climate? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Please explain your answer.	a) The Māori Trustee considers there is a need to provide: <ul style="list-style-type: none"> <li>• key learnings from all the strategies/actions that are undertaken, as part of this process, by different lead agencies should be made available in a digestible form.</li> <li>• one information portal, that contains relevant information/documents to keep everyone informed.</li> <li>• interactive maps.</li> </ul> b) The Māori Trustee considers that strengthening biosecurity in the face of climate change is critical. Biosecurity threats, such as mangrove incursion and tobacco weed spread are likely to have the largest impact on the Māori Trustee’s portfolio.  c) The Māori Trustee considers it is critical that appropriate engagement occurs with Māori landowners and specialists to identify vulnerable ecosystems. This will ensure that ecosystems that are at-risk are identified and actions can be taken to protect them.
	17. What do you identify as the most important actions that will come from outside of central government (eg, local government, the private sector or other asset owners, iwi, hapū and/or other Māori groupings such as: business, forestry, fisheries, tourism, urban Māori, the private sector) to build the natural environment’s resilience to the impacts of climate change?	<p>The Māori Trustee considers that it is critical that mātauranga Māori and Te Ao Māori perspectives are incorporated at all levels to ensure that appropriate decisions and solutions are made with regards to the natural environment.</p> <p>The Māori Trustee also considers that collaboration will be integral to ensuring actions responding to climate change risks and events, both inside and outside of government, are cohesive and interact with each other. Central and local government will play a key role in enabling and monitoring this.</p>



	<p>18. Are there additional actions that would advance the role of Māori as kaitiaki in a changing climate?</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure</p> <p>Please explain your answer.</p>	<p>The Māori Trustee considers that:</p> <ul style="list-style-type: none"> <li>• Māori landowners need to be actively involved in decision making and are able to exercise their tino rangatiratanga.</li> <li>• There is a need for council plans to be adaptive to ensure that land use activities are not unnecessarily limited when climate settings change.</li> <li>• Co-governance structures, similar to that of the Greater Wellington Regional Council’s Te Upoko Taiao – Natural Resources Committee<sup>6</sup> are implemented with Māori being equally represented on decision-making authorities.</li> </ul>
<p>Homes, buildings and places</p>	<p>19. Do you agree with the outcome and objectives in this chapter?</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially</p> <p>Please explain your answer.</p>	<p>The Māori Trustee’s portfolio holds in excess of 1,000 buildings, with use being a mixture of rural, residential and commercial. Additionally, the Māori Trustee’s portfolio holds a considerable amount of rural property improvements, that are not insurable, that will likely be impacted by climate change risks and events.</p> <p>The Māori Trustee agrees in principle with the outcome and objectives set out in the ‘Homes, buildings and places’ chapter of the draft National Adaptation Plan. However, the Māori Trustee considers that objectives HBP3 and HBP4 need to include an explicit outcome to empower iwi/Māori to be able to have equal decision making powers in regards to their cultural assets and taonga. The Māori Trustee therefore suggests that the following outcome be included in HBP3 and HBP4:</p> <ul style="list-style-type: none"> <li>• ‘Enabling and empowering iwi/Māori to have equal powers in regards to making decisions for their cultural assets and taonga’</li> </ul>
	<p>20. What else should guide central government’s actions to increase the resilience of our homes, buildings and places?</p>	<p>The Māori Trustee considers that transparency should guide central government’s actions to increase the resilience of Aotearoa’s homes, buildings and places. The Māori Trustee is of the opinion that the government should make key learnings from past events and relevant research (that are guiding present and future decisions on climate resilience) publicly available on a singular platform. This will provide the public with reassurance that the government is acting on the most up-to-date and relevant data.</p> <p>The Māori Trustee also considers that the Government needs to set actions with conviction, that no matter the pressure, planning will not enable development of houses and buildings in climate prone areas.</p>
	<p>21. Do you agree with the actions set out in this chapter?</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially</p> <p>Please explain your answer.</p>	<p>The Māori Trustee agrees in principle with the actions set out in this chapter. However, the Māori Trustee considers that many of the proposed actions in the future works programme will need to be adopted promptly to adequately address the stated objectives and outcomes. For example, HBP2 only has one action that is current (has funding, mandate and clear scope) and it does not directly address its objective of providing effective planning to reduce climate risks.</p> <p>The Māori Trustee proposes that the ‘support kaitiaki communities to adapt and conserve taonga/cultural assets’ action needs to provide actual funding opportunities and not just ‘funding advice’. A framework for providing funding should be developed to ensure equitable allocation and remove the principle of first-come, first served.</p> <p>The Māori Trustee also supports a co-ordinated and cross-governmental approach to addressing the objectives, outcomes and actions stated in this chapter.</p>

<sup>6</sup> <https://archive.gw.govt.nz/te-upoko-taiao-natural-resources-plan-committee/>



	<p>The Māori Trustee would also like Te Tumu Paeroa to be directly involved with the proposed action ‘Partner with Māori land owners to increase the resilience of Māori-owned land, homes and cultural sites’. The Māori Trustee considers that her unique position and extensive portfolio of whenua Māori will provide invaluable insights to the team working on this action.</p>
<p>22. Are there other actions central government consider to:</p> <p>a) Better promote the use of mātauranga Māori and Māori urban design principles to support adaptation of homes, buildings and places?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>b) Ensure these actions support adaptation measures targeted to different places and respond to local social, cultural, economic and environmental characteristics?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>c) Understand and minimise the impacts to cultural heritage arising from climate change?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>a) The Māori Trustee considers a direct action for central and local government to undertake training and education to understand Māori values/mātauranga Māori/Māori design principles and embed them into their mahi is critical. The current structure of central and local government institutions does not often provide for or serve Māori values. A genuine commitment from local and central government to learn and understand what they are trying to promote is therefore imperative. It will also assist in enhancing and strengthening the partnership aspect of objective HBP3.</p> <p>b) The Māori Trustee proposes that a mechanism be created to allow for landowners to create and submit their own risk management plans to the council as an acknowledgement that council hazard planning/mapping is not always reflective of what is actually happening on the land. This will allow for a more nuanced approach to council hazard and risk management planning and provide an opportunity for redress if landowners evidentially disagree with any planning restrictions imposed on their land.</p> <p>c) The Māori Trustee supports Māori (iwi/hapū/whānau/Māori landowners) being involved at all levels of planning to ensure decisions made are in the best interest of their whenua, cultural heritage, assets and taonga. The Māori Trustee therefore advocates for actions that provide for this.</p>
<p>The following questions are about existing buildings. These can include housing, communal residential (hotels, retirement village), communal non-residential (church, public swimming pools), commercial (library, offices, restaurant), industrial (factory, warehouse).</p> <p>23. Do you think that there is a role for government in supporting actions to make existing homes and/or buildings more resilient to future climate hazards?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  If yes, what type of support would be effective?</p>	<p>The Māori Trustee considers that the Government has a direct responsibility to support actions that make existing homes and/or buildings more resilient to future climate hazards. Historically, the Government has permitted development in climate-prone areas, and therefore they have a responsibility to provide support to those who have been impacted by insufficient planning.</p> <p>The Māori Trustee therefore proposes that the Government provides targeted funding opportunities to ensure those that would otherwise struggle to, have a chance to become climate resilient.</p>
<p>24. From the proposed actions for buildings, what groups are likely to be most impacted and what actions or policies could help reduce these impacts?</p>	<p>The Māori Trustee considers communities in lower socio-economic areas, that have properties with low valuations and outstanding maintenance will struggle to afford to become climate resilient.</p> <p>The Māori Trustee considers all proposed actions will need to be progressed to meet the objectives and outcomes listed in this chapter. There is also a need for both the current and proposed actions to create new targeted funding programmes to ensure everyone has an equitable chance to become climate resilient. A framework for providing these funding programmes should be developed to ensure equitable allocation and remove the principle of first-come, first served.</p>



		<p>The Māori Trustee requests that Te Tumu Paeroa be contacted directly by the project team at Te Tūapapa Kura Kāinga (Ministry of Housing and Urban Development) to be involved with the proposed action ‘Partner with Māori land owners to increase the resilience of Māori-owned land, homes and cultural sites’.</p>
	<p>25. What are some of the current barriers you have observed or experienced to increasing buildings’ resilience to climate change impacts?</p>	<p>The Māori Trustee considers the lack of targeted funding and the inherent difficulties with lending, servicing debt, developing and the governance of Māori land to be the prevailing barriers that limit Māori landowners from increasing the climate resilience of their whenua and assets. Over 16,000 Māori land blocks in Aotearoa do not have a governance structure<sup>7</sup> and for those that do, the vast majority often earn very modest incomes. For example, 73% of blocks administered in the Māori Trustee’s portfolio generate less than \$10,000 revenue per annum and 58% generate less than \$5,000. For approximately 30% of our Māori landowning entities, meeting base administration costs and rates bills is already entirely or partially prohibitive and this number will only increase as the costs to meet compliance for new local and central government environmental regulations rises.</p> <p>The reality for many Māori landowning entities is that they simply do not have the reserves to become climate resilient. The Māori Trustee therefore advocates for solutions to be developed, including targeted funding, to address these barriers.</p>
<p><b>Infrastructure</b></p>	<p>26. Do you agree with the outcome and objectives in this chapter?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially                  Please explain your answer.</p>	<p>The Māori Trustee supports objective I3’s adaptive capacity approach.</p>
	<p>27. What else should guide central government’s actions to prepare infrastructure for a changing climate?</p>	<p>The Māori Trustee considers it is critical to ensure there is integrated planning between the infrastructure planning agencies and the entities responsible for building the infrastructure.</p>
	<p>28. Do you agree with the actions set out in this chapter?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially                  Please explain your answer.</p>	<p>The Māori Trustee particularly supports the critical action to ‘Develop a methodology for assessing impacts on physical assets and the services they provide’. This is particularly important in terms of assessing risks to roading and telecommunications infrastructure in remote, rural communities. The Māori Trustee is very pleased to see that opportunities to integrate mātauranga Māori and nature –based solutions will also be explored</p>
	<p>29. The national adaptation plan has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa.</p> <p>a) Do you see potential for further aligning actions across local government, central government and private sector asset owners?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>a) The Māori Trustee considers it is critical to ensure planning integration and robust implementation plans.</p> <p>b) The Māori Trustee considers it is critical that local mana whenua perspectives and mātauranga Māori be taken into account in infrastructure adaptation decision-making. It is also critical that Māori be involved early in the consultation process.</p> <p>c) No comment.</p>

<sup>7</sup> <https://maorilandcourt.govt.nz/assets/Documents/Publications/Maori-Land-Update-2021-ver-1.pdf>, p. 1.



	<p>b) Do you see any further opportunities to include local mana whenua perspectives and mātauranga Māori in infrastructure adaptation decision-making?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>c) Do you see any further opportunities to include local community perspectives in infrastructure adaptation decision-making?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>d) Do you see any further opportunities to ensure that groups who may be disproportionately impacted by climate change, or who are less able to adapt (such as those on low incomes, beneficiaries, disabled people, women, older people, youth, migrant communities) have continued and improved access to infrastructure services as we adapt?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>e) Do you think we have prioritised the right tools and guidance to help infrastructure asset owners understand and manage climate risk?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>d) The Māori Trustee considers it is absolutely critical that local mana whenua perspectives and mātauranga Māori be taken into account in infrastructure adaptation decision-making. It is imperative that there is an agreed process developed to achieve this. Te Tumu Paeroa would like to be involved with this process, such as participating in stakeholder groups.</p> <p>The Māori Trustee considers it is important to acknowledge that the access to infrastructure in rural communities is often limited in the first place. A balance needs to be found to becoming self-sufficient and relying on external infrastructure, particularly for electricity and telecommunications/ internet connections. The provision of an assessment mechanism would be beneficial.</p> <p>e) The Māori Trustee considers the discussion document to be lacking tools and guidance and strongly suggests that these need to be developed.</p>
	<p>30. Are there additional infrastructure actions that would help to strengthen Māori climate resilience?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>The Māori Trustee considers it would be beneficial to provide targeted funding to assist with infrastructure to allow self-sufficiency for electricity supply, telecommunications and internet connections in isolated communities.</p>
	<p>31. Are there any other tools or data that would help infrastructure asset owners make better decisions?</p>	<p>No comment.</p>
<p><b>Communities</b></p>	<p>32. Do you agree with the outcome and objectives in this chapter?  <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Partially                  Please explain your answer.</p>	<p>The Māori Trustee supports enabling and empowering communities to make decisions and plan for themselves in response to climate change related risks and events. The Māori Trustee therefore partially agrees with the outcomes and objectives set out in this chapter.</p> <p>The Māori Trustee considers that the objectives in this chapter could be clearer and more direct with their intention and therefore proposes that the following changes be made to objectives C1, C2 and C3:</p>





	<p>Objective C1 to read “Enable communities to adapt to climate related risks and events”.</p> <p>Objective C2 to read “Support vulnerable people and communities in their preparation and response to climate related risks and events”.</p> <p>Objective C3 to read “Support communities to plan, prepare and respond to climate events that cause disruption and/or displacement”.</p>
<p>33. Do you agree with the actions set out in this chapter?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Partially</p> <p>Please explain your answer.</p>	<p>The Māori Trustee agrees partially with the actions set out in this chapter.</p> <p>The Māori Trustee considers that the proposed action to ‘Expand current funding for proactive community resilience’ needs to be progressed into the current work programme immediately. Enabling Māori and their communities to build climate resilience through decentralised and targeted funding will be critical in meeting the outcomes and objectives of this chapter.</p> <p>The Māori Trustee also considers that the current actions for objective C3 do not sufficiently support internal displacement and migration within Aotearoa. The Māori Trustee therefore proposes that an internal Climate Migration Action Plan be also developed for each region. The plans can have the same key values as the suggested Climate Migration Action Plan but also provide support and resources to assist communities, particularly Māori, explore ways of maintaining connections with their whenua and cultural assets in the event of displacement.</p>
<p>34. What actions will provide the greatest opportunities for you and your community to build climate resilience?</p>	<p>No comment.</p>
<p>35. Are there additional actions central government should consider to:</p> <p>a) Support your health and wellbeing in the face of climate change?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Unsure</p> <p>Please explain your answer.</p> <p>b) Promote an inclusive response to climate change?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Unsure</p> <p>Please explain your answer.</p> <p>c) Target support to the most vulnerable and those disproportionately impacted?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Partially</p> <p>Please explain your answer.</p>	<p>a) No comment.</p> <p>b) The Māori Trustee considers a direct action for all central and local government employees working in this space to undertake training and education to understand Māori values/mātauranga Māori is critical to ensure an inclusive and collaborative approach is exercised. The current structure of central and local government institutions does not often provide for or serve Māori values. A genuine commitment from local and central government to learn and understand what they are trying to promote is therefore imperative.</p> <p>c) The Māori Trustee considers a direct action for central and local government to analyse, collate and publicly share key learnings and data from previous natural and climate related events to be critical in meeting this chapter’s objectives and outcomes. A clear assessment of what has and has not been successful in the past will assist in developing appropriate targeted approaches for vulnerable communities and those who will be disproportionately impacted by climate related events. The assessment should also analyse the costs and benefits to a community’s social, cultural, environmental and economic wellbeing.</p>



	<p>36. What do you think are the most important actions that will come from outside of central government (eg, local government, the private sector or other asset owners, iwi, hapū, non-government organisations, community groups) to strengthen community resilience in the face of climate change?</p>	<p>The Māori Trustee considers actions that allow for meaningful collaboration between all levels of society to be crucial in strengthening community resilience in the face of climate change. Community resilience will be reliant on all sectors of society being willing to participate and it will be the central and local government’s responsibility to lead and enable this collaboration.</p>
	<p>37. Are there additional actions that could be included in the national adaptation plan to help strengthen climate resilience for iwi, hapū and whanau?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>The Māori Trustee considers that a mechanism should be developed that allows landowners to create and submit their own risk management plans when council’s hazard planning/mapping is not evidentially reflective of what happens on the whenua. This will enable Māori landowners to increase their ability to remain/become climate resilient without unreasonable restrictions limiting their sustainable land use and development opportunities.</p>
<p><b>The economy and financial system</b></p>	<p>38. Do you agree with the outcome and objectives in this chapter?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially                  Please explain your answer.</p>	<p>The Māori Trustee supports:</p> <ul style="list-style-type: none"> <li>the outcome ‘A high wage and low emission economy, which adapts and builds resilience to a changing climate’</li> <li>objectives EF1 and EF2, to provide the tools to respond to risk.</li> </ul>
	<p>39. What else should central government do to realise a productive, sustainable and inclusive economy that adapts and builds resilience to a changing climate?</p>	<p>No comment.</p>
	<p>40. Do you agree with the actions set out in this chapter?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Partially                  Please explain your answer.</p>	<p>The Māori Trustee particularly supports the following “supporting actions”:</p> <ul style="list-style-type: none"> <li>Design and implement the Farm Monitoring Programme to determine farm performance</li> <li>Continue prioritising research and investment in climate related research                         <ul style="list-style-type: none"> <li>Enhancing the land use platform</li> </ul> </li> </ul> <p>Te Tumu Paeroa is keen to be involved in actions that relate specifically to Māori land/landowners such as the “<i>Deliver the Māori agribusiness extension</i>” action.</p>
	<p>41. Are there other actions central should consider to:</p> <p>a) Support sectors, businesses and regional economies to identify climate risks and adapt?  <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Unsure                  Please explain your answer.</p> <p>b) Promote a resilient financial system in the face of climate change?  <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>No comment.</p>
	<p>42. What do you think are the most important actions that will come from outside of central government (eg, local government, the private sector or other asset</p>	<p>The Māori Trustee considers the most important actions are:</p> <ul style="list-style-type: none"> <li>Support Māori small business resilience and transitions</li> </ul>



<p>owners, iwi, hapū and/or other Māori groupings such as: business, forestry, fisheries, tourism, urban Māori, the private sector) to reduce the economic and financial risk they face from climate change?</p>	<ul style="list-style-type: none"> <li>• Deliver the Māori agribusiness extension</li> <li>• Research business adaptation preparedness &amp; provide guidance for small businesses to adapt.</li> </ul>
<p>43. Are there additional actions within the financial system that would help strengthen Māori climate resilience?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p>	<p>The Māori Trustee has concerns about the lending barriers that exist on Māori land, where owners' cannot borrow against the land. This will continue to impede resilience and recovery options for Māori landowning entities that are able to service debt. However, as already highlighted in previous responses, the vast majority of Māori landowners will struggle to service loans. The Māori Trustee therefore proposes that the financial system should establish concessionary loans with long repayment periods to acknowledge the existing and historic barriers placed on whenua Māori and Māori landowners.</p> <p>The Māori Trustee also seeks an extension of Crown forestry funding, where they pay a rental and potentially some harvest income.</p>
<p>44. In the context of other risk management options (eg, flood barriers, retreat from high-risk areas), what role should insurance have as a response to flood risk?                  Please explain your answer.</p>	<p>The Māori Trustee considers there should be more flexibility with insurance pay-outs to be able to be used for relocating buildings.</p>
<p>45. Should the Government have a role in supporting flood insurance as climate change risks cause private insurance retreat?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Unsure                  Please explain your answer.</p> <p>a) Does your answer to the above question depend on the circumstances? (For example, who the owner is (eg, low income), the nature and characteristics of the asset (eg, residential or commercial property, contents and vehicles), what other risk management options are available and their cost/benefit, and where the asset is located)? Please explain your answer.</p>	<p>a) The Māori Trustee considers that the Government should have a role in supporting flood insurance when climate change risks cause private insurance retreat. This is particularly relevant where district councils have permitted activities and consented the development of buildings on flood prone land, e.g. flooding events in East Coast and Westport.</p>
<p>46. If you think the Government should have a role in supporting flood insurance as climate change risks cause private insurance retreat, how do you envision the Government's role, and how is this best achieved (eg, direct support and/or indirect support such as reducing underlying flood risk)?</p>	<p>The Māori Trustee considers the Government should have a role in supporting flood insurance as climate change risks cause private insurance retreat. This could be done by underwriting flood insurance.</p>
<p>47. If the Government were to directly support flood insurance:</p> <p>a) What is the best way to provide this direct support?</p> <p>b) Should the Government's focus be to support availability or affordability of insurance, or both?</p> <p>c) How should the costs of that support be funded, and by whom?</p> <p>d) What are the benefits and downsides of this approach?</p>	<p>a) The Māori Trustee considers the Government should have a role in underwriting flood insurance in collaboration with insurers.</p> <p>b) The Māori Trustee considers the Government should have a role in supporting the availability <b>and</b> affordability of insurance.</p> <p>c) The Māori Trustee considers the Government, councils and insurers should support the cost of funding.</p> <p>d) The Māori Trustee considers the benefits of this would be that access to insurance would be provided in high risk areas where current insurance is difficult or impossible to obtain. The downside is the potential cost being unknown.</p>



	<p>e) Should this support be temporary or permanent?</p> <p>f) If temporary, what additional measures, if any, do you think would be needed to eventually withdraw this support (eg, undertaking wider flood protection work)?</p> <p>g) What would the risks or benefits be of also including non-residential property, such as commercial property?</p> <p>h) What design features or complementary policies are needed so any flood insurance intervention retains incentives for sound flood-risk management (eg, discouraging development in high-risk locations)?</p>	<ul style="list-style-type: none"> <li>The Māori Trustee considers the support should be temporary, for example a maximum of 25 years. This would give the insurance industry time to effectively price risk and insurance buyers time to remediate or re-settle.</li> </ul> <p>e) The Māori Trustee considers it will be important to carry out work to provide resilience, for example flood protection or erosion control work.</p> <p>f) The Māori Trustee considers the main risks would be the high cost and low uptake.</p> <p>g) The Māori Trustee considers that:</p> <ul style="list-style-type: none"> <li>only buildings built before a certain date should be eligible for subsidised insurance</li> <li>there should be Council restrictions on new developments.</li> </ul>
	<p>48. How effective do you think the insurance “price signal” (eg, higher premiums or loss of insurance) is for providing incentives to reduce flood risk?</p>	<p>The Māori Trustee considers that the insurance “price signal”, should be very effective in providing incentives to reduce flood risk.</p>
	<p>49. In your view, should a scheme similar to Flood Re in New Zealand be used to address current and future access and affordability issues for flood insurance? Why or why not?</p>	<p>The Māori Trustee considers that a scheme similar to <i>Flood Re</i> in New Zealand could be used to address current and future access issues and make flood insurance more affordable.</p>
	<p>50. How do you think a scheme similar to Flood Re in New Zealand could support or hinder climate change adaptation initiatives in New Zealand?</p>	<p>The Māori Trustee considers there are pros and cons of implementing an insurance scheme. The benefits of being able to restore property would need to be balanced with behavioural changes.</p>
<p><b>Closing general questions</b></p>	<p>51. Do you have any other thoughts about the draft national adaptation plan that you would like to share?</p>	<p>The Māori Trustee considers that there needs to be greater emphasis on the requirement for monitoring and reporting. This should include an overarching monitoring report as well as individual reports for the different strategies. This will ensure accountability to achieve the outcomes and objectives set out in the plan.</p>
<p><b>Managed Retreat</b></p>	<p>52. Do you agree with the proposed principles and objectives for the Climate Adaptation Act? Please explain why or why not.</p>	<p>The Māori Trustee agrees with the proposed principles and objectives for the Climate Adaptation Act, however, further clarification on how these principles will be implemented in practice is needed.</p> <p>The Māori Trustee particularly supports the principles that:</p> <ul style="list-style-type: none"> <li>Iwi/Māori are represented in governance and management and have direct input and influence in managed retreat processes, and outcomes for Iwi/Māori</li> <li>Social and cultural connections to community and place are maintained as much as possible.</li> </ul>
	<p>53. Are there other principles and objectives you think would be useful? Please explain why.</p>	<p>The Māori Trustee considers that the below whakataukī should be included to guide the principles and objectives of managed retreat:</p> <p>“Ka mate kāinga tahi, ka ora kāinga rua. When the first home dies, a second home comes to life”.</p>



		<p>The Māori Trustee considers the above whakataukī to capture the essence of managed retreat, particularly when speaking of whenua that has been taken by nature, for example, by coastal inundation. It speaks to the need of finding a new kāinga when the original kāinga is gone.</p>
	<p>54. Do you agree with the process outlined and what would be required to make it most effective?</p>	<p>The Māori Trustee agrees with the process outlined for managed retreat. The Māori Trustee recommends that landowners be included alongside parties that can request the initiation of the managed retreat process.</p> <p>The Māori Trustee considers that these plans, where possible, need to be proactively created in preparation for climate related events. The plans should then be revisited and adjusted periodically to reflect up-to-date data as well as after an extreme natural or climate related event. For the process to be effective, managed retreat plans need to be able to be created prior to the implementation of the Natural and Built Environments Act and specific guidance should be developed for Councils to enable them to do so.</p>
	<p>55. What do you think should trigger the process? What data information would be needed?</p>	<p>The Māori Trustee agrees with the triggers currently set out in the process, however, the Māori Trustee considers that landowners should be included alongside parties that can request the initiation of the managed retreat process. The Māori Trustee also advocates for mātauranga Māori to be treated a valid data source for triggering the process.</p>
	<p>56. What other processes do you think might be needed, and in what circumstances?</p>	<p>The Māori Trustee anticipates the topic of managed retreat to be confronting for many of those involved. The Māori Trustee therefore considers that the below processes need to be developed to ensure simplicity and clarity:</p> <ul style="list-style-type: none"> <li>• A process for dispute resolution, for example, if parties were to disagree on the timeframe for retreat.</li> <li>• A process for weighting and applying different knowledge systems to clarify what approach will be taken if advice is contradictory.</li> <li>• A process for dealing with different land statuses, i.e. Māori land, general land, reservations etc.</li> <li>• A process for dealing with who will own the land that is retreated from. The Māori Trustee strongly advocates for co-governance decisions be made on this matter.</li> <li>• A process that depicts clear triggering points and shows the movement of land going through the transitions of protection to adaptation and finally to retreat.</li> <li>• A process that shows where the land, if needed, for retreat will come from. The process will need to acknowledge tribal connections, particularly with regards to whenua Māori to ensure land is not inappropriately gifted or exchanged in areas that the landowners share no whakapapa with. The Māori Trustee suggests that the government looks to past examples like the South Island Landless Natives Act to show why such precautions are needed.</li> <li>• A process for landowners to submit their own risk management and hazard mapping to councils when council hazard planning/mapping does not evidentially reflect what is happening on the ground.</li> <li>• A process that requires full research studies to be conducted year on year to capture all data related to manage retreat. This will ensure continuous learning and improvement to managed retreat processes.</li> </ul>
	<p>57. What role and responsibilities do you think central government, local government, iwi/Māori, affected communities, individuals, businesses, and the wider public should have in</p>	<p>a) The Māori Trustee considers that the managed retreat process will require a collaborative approach and therefore those involved in the process should have an equitable stake. To ensure the Tiriti principle of partnership is adhered to, iwi/Māori should be able to set their level of involvement in the process.</p>



<p>a) A managed retreat process?</p> <p>b) Sharing the costs of managed retreat?</p>	<p>b) The Māori Trustee supports an equitable sharing of costs for managed retreat. The sharing of costs should acknowledge:</p> <ul style="list-style-type: none"> <li>• The historic barriers and inherent complexities of Māori land.</li> <li>• Ki uta ki tai – the interconnectivity of all things. Those who are being adversely effected due to the activities of someone else should not have to bear the brunt of those costs.</li> </ul>
<p>58. What support may be needed to help iwi/Māori, affected communities, individuals, businesses and the wider public participate in a managed retreat process?</p>	<p>The Māori Trustee considers that funding to increase the capability and capacity of iwi/Māori is fundamental to ensure they are able to sufficiently participate in the managed retreat process. This funding could also go towards facilitating and providing expert advice at regionally run wānanga as well as developing a free and easily accessible platform that holds all relevant advice and information.</p>
<p>59. A typical managed retreat will have many costs, including those arising from preparation (including gathering data and information), the need to participate in the process, relocating costs and the costs of looking after the land post-retreat. In light of your feedback on roles and responsibilities (Q7), who do you think should be responsible for or contribute to these costs?</p>	<p>The Māori Trustee supports the responsibility for costs associated with managed retreat to be distributed equitably amongst all effected parties.</p>
<p>60. What do you consider the key criteria for central government involvement in managed retreat?</p>	<p>The Māori Trustee considers that central government will be required to be involved in the managed retreat process for major natural disasters and where abdication would breach their Te Tiriti o Waitangi obligations.</p>
<p>61. There may be fewer options for homes and community buildings (eg, schools, churches, community halls) to move than businesses (eg, retail and office buildings, factories, utilities) for financial, social, emotional and cultural reasons. That may suggest a different process for retreat, and different roles and responsibilities for these actors. Should commercial properties/areas and residential properties/areas be treated differently in the managed retreat process? Please explain why.</p>	<p>The Māori Trustee supports the process of managed retreat to be handled on a case by case basis. The Māori Trustee considers the interests in commercial properties and residential properties to be different, for example business owners are likely to have less emotional attachments to their commercial properties than their residential counterparts, putting them in a better position to relocate.</p>
<p>62. Even in areas where communities are safe, local services and infrastructure such as roads, power lines and pipes may become damaged more frequently and be more expensive to maintain because of erosion or increases in storms and rainfall, for example. Local councils may decide to stop maintaining these services. Are there circumstances in which people shouldn't be able to stay in an area after community services are withdrawn?</p>	<p>The Māori Trustee considers that people should only have to leave their homes in areas where community services are withdrawn if there are no alternative options and staying provides significant risks to their health and safety.</p>
<p>63. In what situations do you think it would be fair for you to be required to move from where you live?</p>	<p>The Māori Trustee considers a nuanced approach will need to be taken to identify situations, in collaboration with impacted communities, for when it would be considered appropriate for people to leave the areas they live in. The approach would need to balance social, cultural, environmental and economic perspectives as well as health and safety.</p>
<p>64. Many residential communities are made up of a combination of renters, owner/occupiers and people who own a property and use it as a second/holiday house. Do you think there are reasons for these groups to have different levels of involvement in a managed retreat process?</p>	<p>The Māori Trustee does not consider there to be a need for these groups to have different levels of involvement in the managed retreat process. However, there should be a requirement for land/property owners to consult with their lessees/renters.</p>



<p>65. It is not always obvious that an area is at high risk from natural hazards or the impacts of climate change. However, council risk assessments and increased data and information should make these risks clearer. Do you think different approaches should be taken for those who purchased properties before a risk was identified (or the extent or severity of the risk was known) and those who bought after the risk became clear?</p>	<p>The Māori Trustee agrees that a different approach should be taken for those who have purchased properties after the extent or severity of a risk is known compared to those who purchased their properties prior.</p>
<p>66. Under what circumstances do you think it would be fair or necessary for government to take different approaches with a greater or lesser degree of intervention or support?</p>	<p>The Māori Trustee considers that decision-making criteria should be developed to clearly demonstrate under what circumstances and to what extent the government will provide support during the managed retreat process. The criteria should address the scale and nature of the event, number of people impacted as well as their Te Tiriti obligations.</p> <p>The Māori Trustee also considers the government to have a direct responsibility to provide support if insufficient central, regional and district planning has permitted activities in areas that lack climate resilience.</p>
<p>67. How do you think land with historical, cultural, social or religious significance (eg, cemeteries or churches) should be treated?</p>	<p>The Māori Trustee supports land with historic, cultural, social or religious significance to be treated with care and respect in the managed retreat process. This requires ensuring all those effected have the chance to be actively involved and contribute to decision making during the process.</p>
<p>68. Some Māori communities, both inland and coastal, have needed to relocate as a result of events (including natural disasters) that have impacted their marae and wāhi tapu. These examples show that Māori communities are aware of the ways that climate change is affecting their marae, papa kāinga and wāhi tapu, and how relocation can be approached as a community, with engagement from iwi, hapū, and whānau. The examples also demonstrate that climate change is impacting coastal communities as well as inland communities located closer to rivers and lakes. How do you think managed retreat would affect Māori?</p>	<p>The Māori Trustee considers that the process of managed retreat will have diverse impacts on Māori that cannot be simplified into singular terms. The process therefore requires a nuanced approach that takes into account the varying cultural, spiritual, environmental, social and economic impacts Māori communities will experience in the face of managed retreat.</p>
<p>69. Managed retreat has rarely occurred in Aotearoa, especially within Māori communities. However, there are examples of Māori proactively working to protect their marae, papa kāinga and wāhi tapu by either relocating or protecting and developing their current sites. In these instances, the focus was on protecting and preserving their taonga for future generations. What do you see as being most important in developing a managed retreat system for iwi/hapū/Māori?</p>	<p>The Māori Trustee considers a co-governance structure to be fundamental in the development of a managed retreat system for iwi/hapū/Māori.</p>
<p>70. Māori land and Treaty settlement land have unique legislative arrangements. Restrictions and protections are placed on Māori land to meet a clear set of principles and objectives that recognise the cultural connection Māori have with the land and a specific focus on land retention and utilisation. Treaty settlement land that has been acquired through Treaty settlement processes is most likely to have cultural significance to a particular iwi or hapū and used to support the aspirations of their people. How do you think Māori land (including Treaty settlement land) should be treated?</p>	<p>The Māori Trustee again considers that the process of managed retreat will have diverse impacts on whenua Māori that cannot be simplified into singular terms. The process therefore requires a nuanced approach that takes into account the varying historic, cultural, spiritual, environmental, social and economic impacts whenua Māori and Māori landowners will experience in the face of managed retreat. The Māori Trustee therefore advocates for a collaborative approach that allows for the health of the whenua to be put first because as the following whakataukī acknowledges <i>Ka ora te whenua, ka ora te tangata, when the whenua is healthy so are the people.</i></p> <p>The Māori Trustee would welcome the opportunity to provide further input and pilot cases from her portfolio to ministry officials to test how managed retreat policies may impact whenua Māori.</p>
<p>71. How do you think post event insurance payments could help support managed retreat?</p>	<p>The Māori Trustee considers that post event insurance payments will need to have flexibility to support managed retreat. This can be achieved through allowing post-event-insurance payments to go towards the relocation of buildings or similar.</p>



	72. Should insurability be a factor in considering whether the Government should initiate managed retreat from an area?	The Māori Trustee supports a nuanced approach to the process of managed retreat and although insurability could be a factor in its initiation it should not be the only consideration.
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## **Conclusion**

10. The Māori Trustee looks forward to discussing this submission with Ministry for the Environment officials.
  
11. Please contact [REDACTED]  
[REDACTED]

**Dr Charlotte Severne**  
Māori Trustee



## Appendices

### Appendix A – The Māori Trustee and Te Tumu Paeroa

#### Who We Are

12. The Māori Trustee is appointed by the Minister for Māori Development under the Māori Trustee Act 1953. The role of the Māori Trustee, is to provide accurate and timely administration and management of whenua and other client assets in compliance with the principles and obligations of trusteeship and agency, and in accordance with the Māori Trustee Act 1953, Trusts Act 2019, Te Ture Whenua Māori Act 1993 and other legislation. The current Māori Trustee, Dr Charlotte Severne, was appointed for a three-year term in September 2018 and was re-appointed for a five-year term in October 2021.
13. Te Tumu Paeroa is the organisation that supports the Māori Trustee to undertake her functions, duties and responsibilities.
14. The Māori Trustee administers around 88,000 hectares of Māori freehold land, as well as general land and other interests and investments, on behalf of approximately 100,000 Māori Land owners.
15. A primary objective of The Māori Trustee, is to protect, utilise and grow the assets of our Māori land owners. The organisation provides land administration and professional trustee and agency services to one third of all Māori land trusts (over 1,700 trusts), as well as targeted development and sector-specific expertise. The organisation is involved in the management of a number of Māori enterprises and development projects.
16. The Māori Trustee currently employs 124 staff across five offices throughout New Zealand, with the Māori Trustee located in Te Whanganui-a-Tara. Our organisation is made up of, but not limited to, trust and property management, law, client services, and other specialist teams. Our employees are focussed on protecting and enhancing the whenua Māori that we have the privilege to administer on behalf of its landowners and their tipuna.
17. Te Tumu Paeroa is unique, in that it is the only nation-wide organisation that manages significant tranches of Māori land and assets on behalf of Māori landowners.

#### Our Vision and Priorities

18. Our vision is: *Ko Te Tumu Paeroa tēnei, te tauawhi nei, te taunaki nei, te tiaki nei ngā whenua Māori mō naianei, mō āpōpō hoki. Ensuring Māori land is protected and enhanced, now and for generations to come.*



Our vision requires a careful balance between protection of the whenua and taiao and enhancement of the whenua through a range of pathways, including commercial development.

19. Our purpose is to be a dedicated professional trustee service for Māori.
20. Our strategic priorities assist us to deliver on our vision and purpose:
  - a. Ensuring consistent delivery of professional trustee services.
  - b. Building trust and confidence across all of our engagements.
  - c. Demonstrating leadership in meeting new challenges to governance and administration of whenua Māori.
21. Our responsibility as trustee in the context of the Kia urutau, kia ora: Kia āhuarangi rite a Aotearoa/ Te mahere urutaunga ā-motu (tuhinga hukihuki) Discussion Documents, is to ensure that the voices of the whenua that we are responsible for, and those landowners who whakapapa to that whenua, are heard and understood.

## Our Portfolio

22. Our portfolio currently<sup>8</sup> consists of the following:
  - a. Number of trusts and other entities under administration – 1,751.
  - b. Number of hectares under management – 88,000.
  - c. Number of owner accounts maintained – 100,793.
  - d. Number of ownership interests – 252,580.
  - e. Number of leases administered – 1,732.
  - f. Client funds under management (market value) – \$ 133.2 million.
  - g. Māori Trustee equity – \$ 170.7 million.

## Our Mahi

23. The Māori Trustee has the responsibility to ensure that the best interests and outcomes for Māori land owners are advanced by Te Tumu Paeroa's mahi.
24. Our core services are:
  - a. Administering trusts as responsible trustee, custodian trustee, and agent
  - b. Convening, running and recording proceedings of meetings of beneficial owners
  - c. Responding to requests for information
  - d. Consulting with advisory trustees and owners
  - e. Leasing property on behalf of owners and administering leases

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<sup>8</sup> The Māori Trustee Annual Report 2021



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- f. Collecting rent and managing arrears and bad debts
  - g. Managing contracts for service entered into by trusts
  - h. Managing and investing cash assets in the Common Fund
  - i. Reporting to beneficial owners
  - j. Acquiring and paying for goods and services
  - k. Preparing financial statements and annual tax returns
  - l. Keeping records for trusts we administer
  - m. Making trust distributions to owners
  - n. Administering grants and scholarships
  - o. Making applications to the Māori Land Court
  - p. Reviewing land use and considering, where appropriate, alternative land use options
  - q. Developing and enhancing property and land management including Asset Management and Farm Environment Plans
  - r. Managing and providing support services for the General Purposes Fund

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