

The Māori Trustee's submission on Inquiry into Community-led retreat and adaptation funding

November 2023



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Summary of Position

1. The Māori Trustee administers, as trustee or agent, approximately 88,000 hectares 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. Additional information regarding the Māori Trustee and Te Tumu Paeroa is set out in the Te Tumu Paeroa's website, www.tetumupaeroa.co.nz.
2. The views expressed in this submission represent the Māori Trustee's position as the single largest trustee and agent of Māori land. However, given the sheer scale and varied nature of the land assets within the Māori Trustee's portfolio, the Māori Trustee's views may not always be shared by all owners of lands she administers.
3. The Māori Trustee summarises her submission as follows:
 - a. The Māori Trustee considers that the Government must consider the prevailing barriers placed on whenua Māori and Māori landowners when developing and implementing adaptation and retreat processes. Any system should not result in additional financial burden to whenua Māori and Māori landowners.
 - b. Where retreat is needed, the Māori Trustee considers the Government needs to establish a process that clearly identifies where whenua, for retreat will come from. This process needs to acknowledge tribal connections and consider the intended status of the whenua retreated to for Māori landowners (i.e. whether it will retain its general land title or will it carry over the same status of Māori freehold land/Māori Reserve Land etc).
 - c. There needs to be more clarity on how a retreat process will impact leases. A majority of whenua administered by the Māori Trustee is leased, including in long term (perpetually renewable) leases, and clarity is needed as to how managed retreat will be managed where the whenua is leased.
 - d. The Māori Trustee envisions a Tiriti-based approach would ensure Māori landowners, whānau, hapū and iwi are empowered and supported by the Crown to exercise their rangatiratanga throughout an adaptation and retreat process. This process will have diverse impacts on Māori that cannot be simplified into singular terms. Therefore, a nuanced approach is required that takes into account the varying cultural, spiritual, environmental, social and economic impacts Māori communities will experience in the face of managed retreat. The Māori Trustee considers this will involve, among other things:
 - adopting the recommendations made by the Expert Working Group;
 - ensuring Māori are part of any decision-making processes for risk assessments; and
 - ensuring the preamble¹ of Te Ture Whenua Māori Act 1993 is supported and provided for in any adaptation or managed retreat system.

¹ "to recognise that land is a taonga tuku iho of special significance to Maori people and, for that reason, to promote the retention of that land in the hands of its owners, their whanau, and their hapu, and to protect wahi tapu: and to facilitate the occupation, development, and utilisation of that land for the benefit of its owners, their whanau, and their hapu:".



- e. The Māori Trustee also considers that the whakataukī, “*Ka mate kāinga tahi, ka ora kāinga rua. When the first home dies, a second home comes to life*”, should be included to guide the outcomes and principles of a managed retreat system as it captures the essence of retreat, particularly with regards to whenua that has been taken by nature, such as coastal inundation.
- f. The Māori Trustee considers a retreat system should require both voluntary and mandatory parts. This will allow individuals and/or communities to retreat early if they wish, while ensuring that those who stay are not risking their life or that of anyone else. The Māori Trustee also considers that it is important that appropriate resourcing is made available to ensure that the affordability of retreat does not force a decision to stay. However, the Māori Trustee considers there needs to be clear direction within a retreat system that identifies scenarios where mandatory retreat would be required.
- g. The Māori Trustee agrees that whenua should no longer be utilised for residential purposes at the end of a retreat process, if that retreat process is mandatory. However, there should be exceptions to utilise the whenua for the purpose and practice of tikanga or kawa, mahinga kai, mara kai, agriculture and horticulture uses.
- h. The Māori Trustee broadly agrees that powers to acquire general land titles by agreement are needed to ensure land is no longer used once a decision has been made. However, the Māori Trustee considers that any powers that result in the compulsory acquisition of land should only be utilised on general land titles. This approach should not be utilised on any Māori freehold land titles which, as suggested in the consultation document², should remain within its ownership structure and status.
- i. Although the consultation document³ addresses land use controls, it appears to have overlooked how an adaptation and retreat system will directly impact rural land and its communities. The vast majority of the Māori Trustee’s portfolio is located in rural areas and is primarily utilised for agricultural and horticultural purposes⁴. Therefore, further thought and meaningful engagement needs to be undertaken to understand the impact an adaptation and retreat system could have on rural land, its communities and Māori landowners.
- j. Māori freehold landowners should be able to exercise mana motuhake with regards to any adaptation or retreat decisions made about their whenua. It is imperative that any decisions made about whenua Māori are not unduly influenced by any one group or entity, that does not represent the views of whenua Māori, at the expense of Māori freehold landowners.
- k. The Māori Trustee considers the current system for funding adaptation does not work well for whenua Māori. This is primarily due to the inherent difficulties Māori landowners encounter when it comes to lending and servicing debt – as banks generally

² [Community-led-retreat-Issues-and-options.pdf \(environment.govt.nz\)](#), p. 53.

³ [Community-led-retreat-Issues-and-options.pdf \(environment.govt.nz\)](#), p. 52.

⁴ For example, of the land administered by the Māori Trustee, the average land size is roughly 48 hectares with 52% of our actively managed leases being utilised for pastoral purposes, 20% for dairy, 11% horticultural/cropping, 7% for forestry and 10% for other uses (commercial, residential, access, unutilised).



do not allow Māori freehold landowners to borrow against their land without a solid financial proposition. The ability for Māori landowners to fund their own adaptation solutions and become climate resilient is hindered further by the modest returns⁵ generated by their, often under or undeveloped, Māori land blocks. This also results in assets on their whenua often being under or uninsured and heightens their risk exposure to a natural hazard event and the cost of adaptation. Therefore, the principle of beneficiary pays that underpins the current system does not, and will likely not, work for whenua Māori and should not be replicated in future systems.

- I. The Māori Trustee considers that targeted and enduring funding solutions need to be established to assist individuals and communities to pay for the costs of adaptation and retreat. The Government's current reactive response to post-event recovery is unsustainable and will likely lead to inequitable outcomes as budgets become tighter, funds dwindle, and similar events become more frequent. The Māori Trustee considers it an opportune time for the Government to establish a funding/general insurance scheme, similar to ACC, that seeks to fund actions related to climate adaptation and retreat. Further information on this proposal can be found in our response to Question 32.
 - m. The Māori Trustee considers that where land has been retreated from, the Crown and/or local authorities should engage with local hapū, iwi and Māori to understand if there is interest in that whenua being available to Māori for cultural purposes, notwithstanding that its use will be restricted by the risk associated with the whenua.
 - n. There is currently a lack of comprehensive data and evidence to inform retreat in advance of a natural disaster. National direction and Council planning does not currently provide sufficient, informative, and user-friendly data to allow communities to easily contemplate and undertake an early retreat, or any retreat, process if required. The Māori Trustee therefore supports the Government to fund, undertake and publicly disseminate research and data (from both mātauranga Māori and Western scientific knowledge sources) at a national level and support local assessments at a local level.
4. The Māori Trustee would welcome the opportunity to discuss her submission with staff from the Environment Select Committee.

⁵ 73% of blocks administered in the Māori Trustee's portfolio generate less than \$10,000 per annum and 58% generate less than \$5,000.



General Submissions

Māori Trustee's portfolio and climatic impacts

1. The Māori Trustee considers that the effects of climate change will have a varied but adverse impact on the extensive landholdings she administers across Aotearoa⁶. Approximately 82%⁷ of the trusts in her portfolio have a portion of land located in low-lying⁸ areas and within 1km of a waterway. This portion equates to 31% of the trusts' combined title area. Furthermore, approximately 15%⁹ of her portfolio is situated within 500m of the coastline. These topography features therefore make 82% of the Māori Trustee's portfolio likely to be more susceptible to severe climatic events.
2. Given these statistics and the Māori Trustee's recent experience with the significant impact of Cyclone Gabrielle, the Māori Trustee considers that whenua Māori and Māori landowners will continue to face significant barriers to becoming climate resilient unless appropriate action is taken to address historic and structural inequities. The Māori Trustee therefore considers that the Government must be cognisant of the barriers placed on whenua Māori and Māori landowners when developing and implementing adaptation and retreat processes.

Impacts on whenua Māori

3. There is a distinct difference between Māori freehold land and general land. Māori freehold land has two main characteristics which make it a unique land tenure: its economic value and its cultural value. An interest in Māori freehold land is, like general land, an economic asset that may be used, traded, sold or transferred. However, unlike general land, Te Ture Whenua Māori Act 1993 contains robust provisions to ensure that land remains in the hands of its owners. Māori freehold land should not be confused with land owned by iwi, which is normally general land passed into iwi ownership through the Treaty Settlement process. Te Ture Whenua Māori Act 1993 recognises that Māori land is a taonga tuku iho of special significance to Māori passed on from generation to generation. An interest in Māori freehold land is also considered a whakapapa link for owners to their tūpuna, whānau, hapū and iwi, whether they reside on the whenua or not. The Māori Trustee therefore considers that any decisions made, with regards to Māori freehold land, should be made by the owners or the governing structures with ownership interests in the whenua. It is imperative that any views and decisions made about whenua Māori are not unduly influenced by any one group at the expense of Māori landowners.
4. The Māori Trustee supports the creation and implementation of appropriate processes for adaptation and retreat. The Crown should facilitate these processes and allow for decision making to be carried out at the local, community and individual landowner level. However, it is

⁶ The Māori Trustee currently administers, as trustee or agent, over 73,500ha of land from Cape Reinga to Bluff and across to the Chatham Islands for approximately 1,586 entities as extracted from her portfolio in October 2023. The median area of a land block within her portfolio is 16.6ha and the mean area is 48ha.

⁷ 1,307 trusts identified which have a total title area of 56,159ha.

⁸ Blocks that have been identified as low-slope or 5-10 degrees: [Stock Exclusion Low Slope Land 2022 | MfE Data Service](#)

⁹ 250 trusts identified which have a total title area of 9,680ha, however, 93 of these trusts are in addition to the above 1307 trusts.



currently unclear what whenua is available for individuals or entire communities to retreat to, when retreat is necessary. The Māori Trustee considers the Government needs to establish a process that shows where whenua, if needed, for retreat will come from. This is particularly important for Māori landowners as the process will need to acknowledge tribal connections. Careful consideration will also be required in regard to the status given to the whenua retreated to, when the whenua retreated from was Māori freehold or Reserved land (i.e. will it retain its general land title or will it carry over the same status of Māori freehold land or Māori Reserved Land).

5. The Māori Trustee considers there needs to be more clarity on how a retreat process will impact leases. A significant portion of the whenua administered by the Māori Trustee is leased, including on long-term perpetually renewable basis, so clarity on how retreat will impact leased whenua is required.

Rural land and its future use

6. The Māori Trustee understands that the inquiry into community-led retreat primarily focuses on the relocation of people from their houses and towns in high natural hazard risk areas. However, at present, the consultation document provides little information on how a retreat process could impact rural communities and their commercial assets. The majority of whenua Māori administered by the Māori Trustee is generally located in rural areas and is primarily utilised for agricultural and horticultural purposes¹⁰. Although the consultation document¹¹ addresses land use controls, it appears to have overlooked what an adaptation and retreat system might mean for this whenua Māori, rural communities and their commercial assets. Further thought and meaningful engagement needs to be undertaken to understand the impact an adaptation and retreat system could have on rural land, its communities, commercial assets and Māori landowners.

Funding mātauranga Māori based methods

7. The Māori Trustee considers it essential that additional funding is invested in mātauranga Māori based research and methodologies to enable holistic solutions in adapting to climate change and mitigating the exposure to risks of natural hazards. The Government will need to ensure that any recommendations based on mātauranga Māori research can be implemented and visibly used in practice. This will assist both Māori and non-Māori to make informed decisions, from an integrated and holistic knowledge base, when adapting to climate change. By way of example, the use and application of mātauranga Māori, by decision-makers, could have mitigated or prevented significant damage and the eventual retreat of the community in the case of Matatā¹².

¹⁰ For example, of the land administered by the Māori Trustee, the average land size is 48 hectares with 52% of our actively managed leases being utilised for pastoral purposes, 20% for dairy, 11% horticultural/cropping, 7% for forestry and 10% for other uses (commercial, residential, access, unutilised).

¹¹ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 52.

¹² [Mātauranga Māori—the ūkaipō of knowledge in New Zealand \(tandfonline.com\)](#), p. 7.



Conclusion

5. The Māori Trustee looks forward to discussing this submission with the Environment Select Committee.
6. Please contact [REDACTED]

Ngā manaakitanga,

Dr Charlotte Severne
Māori Trustee

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Specific Submissions

Submission Table

Questions	Submission point
Introduction	
1. Do you think we should use the term 'community-led retreat'? If not, what do you think we should use and why?	The Māori Trustee is generally comfortable with the term 'Community-led retreat' and/or 'Te Hekenga Rauora' to be used to describe the retreat-process at a national level. However, as the retreat process is inherently quite personal, communities and Māori should be able to adopt a term/s that they most identify with at a regional level and have this reflected in planning instruments at a city, district, and regional level.
The need for change	
2. Are there other barriers to Māori participation in adaptation and upholding Māori rights and interests? How can we better support Māori?	<p>The Māori Trustee broadly agrees with the barriers identified in the consultation document¹³ that inhibit Māori participation in adaptation planning.</p> <p>However, the Māori Trustee considers the following barriers also need to be understood and addressed in any new system to ensure that Māori are able to effectively participate in adaptation processes, and Māori rights and interests are upheld particularly in relation to whenua Māori:</p> <ul style="list-style-type: none"> • the complexities that exist due to whenua Māori often being leased, which can, at times: <ul style="list-style-type: none"> ○ limit owners' engagement with and occupation of their whenua; and ○ alienate owners from decision-making processes as planning processes are usually directed to consult the occupier rather than the owners of the whenua. • the inherent difficulties with lending, servicing debt, developing and the governance of whenua Māori to be the prevailing barriers that limit Māori landowners from increasing the climate resilience of their whenua and assets. <p>Further, the Māori trustee considers that any new adaptation and retreat system will need to:</p> <ul style="list-style-type: none"> • ensure land is not inappropriately gifted or exchanged in areas that landowners have no rights or interests in and share no whakapapa with; and • ensure that landowners are able to maintain their whakapapa relationships with whenua that is retreated from. This will require a nuanced approach as no case is likely to be the same.
3. Are there other issues that affect the quality of risk assessments and local adaptation planning? How can we strengthen our approach?	<p>The Māori Trustee considers that inconsistent directives in Council plans and infrequent plan reviews have led to the quality of risk assessments to be lacking in some regions. This has resulted in inappropriate development in hazardous areas with many communities now put under undue risk of a severe weather event seriously impacting their lives and livelihood. This has been particularly prevalent for communities, such as the Esk Valley, who were directly impacted by Cyclone Gabrielle.</p> <p>The Māori Trustee therefore welcomes the Government's intention to set consistent national direction for natural hazard risk assessments and local adaptation planning through the proposed National Policy Statement for Natural Hazard Decision-making and subsequent comprehensive policy. It will be imperative that future policy is more stringent than current policy when it is adopted at a national level and implemented at a local level, with appropriate checks and balances, to ensure developments no longer occur in high hazard areas (i.e. flood plains, areas highly susceptible to erosion).</p>
4. Are there other issues that limit our ability to retreat in advance of a disaster? How can we improve our approach?	The Māori Trustee considers there is currently a lack of comprehensive data and evidence to inform retreat in advance of a natural disaster. National direction and Council planning does not currently provide sufficient, informative, and user-friendly data to allow communities to easily contemplate and undertake an early retreat, or any retreat, process if required. The Māori Trustee therefore supports the Government to fund, undertake and publicly

¹³ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 23-24.



	disseminate research and data (from both mātauranga Māori and Western scientific knowledge sources) at a national level and support local assessments at a local level.
5. Are there other issues with the way we fund adaptation? How can we improve our approach?	<p>The Māori Trustee considers that whenua Māori and Māori landowners encounter different and additional issues, with the way that adaptation is funded, compared to general landowners. This is due to the complexities and nuances of Māori land ownership¹⁴ and the historical barriers that have led to the underdevelopment of whenua Māori.</p> <p>As highlighted in the consultation document¹⁵ the primary responsibility for meeting the costs of adaptation generally falls on asset owners. A vast majority of the land blocks administered by the Māori Trustee often earn very modest incomes¹⁶. Further, the assets of Māori landowners are often either under or uninsured. Māori landowners are therefore more likely to be financially exposed to the costs of adaptation and ultimately unlikely to meet them on their own. The Māori Trustee therefore considers that a targeted funding mechanism needs to be established to directly assist Māori landowners with the costs of adaptation.</p>
6. What do you think the costs are of a failure to adapt or failure to adapt well?	<p>A failure to adapt or to adapt well to climate change will likely lead to the further displacement of Māori landowners and limits their ability to become climate resilient. Māori landowners already face a unique set of circumstances that are likely to produce inequitable or suboptimal outcomes if they are not adequately addressed in adaptation processes. This is due to factors such as:</p> <ul style="list-style-type: none"> • the current locality of their whenua; • whenua Māori is generally small in size with marginal land classes that generally makes it not economically viable in its own right; • the complexities of whenua Māori having multiple ownership interests; • the cultural, spiritual and whakapapa connections Māori landowners have with their whenua is unique and retreat will likely negatively impact their wairua; • the economic ability/inability of Māori landowners to retreat on their own accord; • a large proportion of Māori being employed in the primary sector which will be directly impacted; • their asset base being under or uninsured; • the age profile of those not willing to retreat; and • lack of robust and concise information. <p>Therefore, the cost of adaptation for Māori is immeasurable and cannot only be viewed through an economic lens. The Māori Trustee urges the Government to establish an adaptation system that includes an intergenerational and te ao Māori worldview that enables Māori to exercise their rangatiratanga.</p>
Te Tiriti-based adaptation	
7. What does a Te Tiriti-based approach to adaptation mean to you?	<p>The Māori Trustee envisions a Tiriti-based approach would ensure Māori (Māori landowners, whānau, hapū and iwi) are empowered and supported by the Crown to exercise their rangatiratanga throughout an adaptation and retreat process. This process will have diverse impacts on Māori (Māori landowners, whānau, hapū and iwi) that cannot be simplified into singular terms. Therefore, a nuanced approach is required 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>The Māori Trustee considers this will involve, among other things:</p> <ul style="list-style-type: none"> • adopting the recommendations made by the Expert Working Group;

¹⁴ Over 16,000 Māori land blocks in Aotearoa do not have a governance structure, compared to over 11,000 Māori land blocks that do. Māori land update: [Māori Land Update June 2022 \(Māorilandcourt.govt.nz\)](https://www.landcourt.govt.nz/māori-land-update-june-2022)

¹⁵ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](https://www.environment.govt.nz/communities/maori/maori-land/maori-land-update-june-2022), p. 18.

¹⁶ 73% of blocks administered in the Māori Trustee’s portfolio generate less than \$10,000 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 with costs to become climate resilient or meet compliance costs for new local and central government environmental regulations.



	<ul style="list-style-type: none"> ensuring Māori are part of any decision-making processes for risk assessments; and ensuring the preamble¹⁷ of Te Ture Whenua Māori Act 1993 is supported and provided for in any adaptation or managed retreat system.
<p>8. What does a local mātauranga-based framework for risk assessment look like to you?</p>	<p>The Māori Trustee envisions that a local mātauranga-based framework would centralise a Māori worldview that allows for a dynamic, holistic, interconnected and intergenerational assessment of risk to the health and longevity of whenua, tangata and mauri. This aligns with ideas already expressed in the Rauora Framework¹⁸ and could be adapted to help inform local mātauranga-based frameworks to risk assessment.</p> <p>However, the Māori Trustee also considers it is important that national direction provides opportunities for Māori at place to develop their own local mātauranga-based frameworks a-iwi, a-hapū, a-whānau as each rohe differs in their tikanga and mātauranga. This will be critical in ensuring Māori feel valued and are able to meaningfully engage with an adaptation or retreat process.</p> <p>Any local mātauranga-based framework for risk assessment should give careful consideration to the following matters, among others:</p> <ul style="list-style-type: none"> what has mātauranga indicated about the area in the past; what tohu has te taiao indicated through observations; how council planning has impacted whenua Māori previously; the whakapapa connections Māori have to the whenua; and the mauri and wairua of the area before and after a natural hazard.
<p>9. What innovative approaches to adaptation planning do you have with your own hapori?</p>	<p>No comment.</p>
<p>10. How can we manage overlapping interests during adaptation planning, including where there is a conflict?</p>	<p>The Māori Trustee considers that if there are overlapping interests or aspirations during the planning process, the needs or aspirations of Māori should not be overshadowed or set aside as they have historically been. There is a need for a robust process to resolve conflicts within communities that ensures equitable outcomes for the whole community.</p> <p>The Māori Trustee agrees that there is an opportunity for Councils in conjunction with Māori (Māori landowners, whānau, hapū and iwi) and communities to develop a document for their rohe that contains principles for weighing different factors in adaptation planning, which could assist with resolving conflicts between different or overlapping interests in a principled manner.</p>
<p>11. What is your perspective on the Crown's te Tiriti obligations to support community-led retreat? Are there existing examples of what that should or should not look like?</p>	<p>The Māori Trustee considers that the Crown's Tiriti obligations with regards to community-led retreat includes:</p> <ul style="list-style-type: none"> funding Māori climate resilience, adaptation and retreat processes; ensuring Māori are provided with robust and up-to-date data, that is in a digestible format, to facilitate informed decisions; enabling and supporting Māori to develop their own risk assessments, adaptation plans and retreat processes; partnering with Māori to identify relocation sites, that are culturally appropriate and have opportunities for use and development, to retreat to; ensuring that the whakapapa connections Māori have with their whenua are retained; ensuring that any process does not result in further cultural, social, health and well-being or economic inequities for Māori; ensuring that whenua retreated from remains within its current ownership and governance structure; ensuring there are protective measures in place for wāhi tapu locations and urupā that may be retreated from; and ensuring that Māori are not penalised for under or uninsured assets.

¹⁷ "to recognise that land is a taonga tuku iho of special significance to Maori people and, for that reason, to promote the retention of that land in the hands of its owners, their whanau, and their hapu, and to protect wahi tapu: and to facilitate the occupation, development, and utilisation of that land for the benefit of its owners, their whanau, and their hapu:".

¹⁸ [Exploring-an-indigenous-worldview-framework-for-the-national-climate-change-adaptation-plan.pdf \(environment.govt.nz\)](#), p. 11-12.



	<p>However, the Māori Trustee strongly suggests, as previously stated in her NAP submission¹⁹ that the Government looks to avoid past examples²⁰ of inappropriately gifting or exchanging land with Māori in areas they share no whakapapa with.</p> <p>The Māori Trustee considers that where land has been retreated from, the Crown and/or local authorities should engage with local hapū, iwi and Māori to understand if there is interest in that whenua being available to Māori for cultural purposes, notwithstanding that its use will be restricted by the risk associated with the whenua.</p>
12. What funding approaches have worked for your own iwi, hapū and hapori?	<p>Direct funding approaches have previously worked well for the Māori Trustee. For example, direct funding was received from the Ministry for Primary Industries (MPI) to undertake desktop assessments of 1039 Māori land blocks, both administered by the Māori Trustee and unadministered Māori land blocks, in response to damage caused by the 2023 Severe Weather Events in the North Island. This enabled the Māori Trustee to establish a whenua impacts map that identified which land blocks were damaged and, to an extent, the severity of the damage.</p>
Risk assessment	
13. How many stages do you think are needed for risk assessment and what scale is appropriate for each of those stages?	<p>The Māori Trustee considers a 4-staged approach should be implemented for risk assessments, with the first three stages aligning with the consultation document²¹ and the fourth being at a property level scale stage. This ensures that a comprehensive risk assessment is being completed at all levels and regions, and provides landowners an opportunity to inform risk assessments on what is happening on the whenua as council hazard planning/mapping are not always accurate at a property level scale. Furthermore, the fourth stage approach could feed into any subsequent local adaptation planning process that may take place.</p> <p>However, the Māori Trustee considers that elements of a te ao Māori approach need to be explicitly referenced in the description of each stage of the process outlined above. This will ensure a holistic approach to risk assessment at every stage.</p>
14. How frequently should a risk assessment be reviewed?	<p>The Māori Trustee considers that a process should be implemented to dictate the frequency in which risk assessments should be undertaken. There could be a standard review period every 5-10 years which could align with Council plan reviews. Due to the unpredictability of climate events and their varying impacts, a list of triggers should be established that require an immediate review. This list should include principles to clarify at what level the triggers will be engaged. However, broadly such a list could include (but is not limited to):</p> <ul style="list-style-type: none"> • a climate change event or natural disaster; • if changes to the environment, informed by mātauranga Māori, suggests that an area is becoming increasingly risky; • if landowners notice changes to the whenua/hazards surrounding them; and • whether there is updated information available that suggests an area or hazardous area is riskier.
15. What do you think makes a risk tolerable or intolerable (i.e. acceptable or unacceptable)?	<p>The Māori Trustee considers that every situation will be unique and that the determinants for intolerability will change from case to case. The risks associated with cultural, spiritual, health and safety, social, environmental and economic factors will all need to be considered by the affected communities – including marae, hapū, iwi and Māori landowners. The Māori Trustee is willing to assist the Government in facilitating wānanga and hui with Māori landowners to discuss these matters with them and gain further insights (potentially on a regional basis).</p>
16. Do you think local risk assessments should be carried out or reviewed by a centralised agency or a local organisation? Why?	<p>The Māori Trustee considers that local risk assessments should be carried out and reviewed by a local organisation. However, appropriate funding and resourcing will need to be provided from Central Government to ensure affordability does not impact good risk assessment.</p>

¹⁹ [Submission by the Māori Trustee on the National Adaptation Plan and Managed Retreat 2022.](#)

²⁰ Wairarapa Moana Trust/Mangakino and the South Island Landless Natives Act 1906.

²¹ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 36.



	The Māori Trustee also considers that Māori (Māori landowners, whānau, hapū and iwi) should be enabled and resourced by Central and Local Government to partner with local organisations chosen to undertake local risk assessments. Whenua Māori is a taonga tuku iho and its vulnerability should be assessed through a te ao Māori lens.
17. Should risk assessments be carried out only by technical experts or should other people also have a role? What role should other people and organisations have?	<p>The Māori Trustee considers there is a role for both technical experts and others in carrying out risk assessments. However, to ensure Māori can exercise tino rangatiratanga, any definition of a ‘technical expert’ should include those with mātauranga Māori a-iwi, a-hapū, a-whānau expertise.</p> <p>Furthermore, the Māori Trustee believes, that due to the personal and highly emotive nature of such a process, there should be a mechanism to take those directly impacted by the assessments along for the journey, including Māori and non-Māori. Therefore, the opportunity to be involved in any local risk assessments should be extended to local Māori and those directly impacted, including Māori freehold landowners.</p>
Local adaptation planning	
18. Do you think there should be a requirement to undertake local adaptation planning? If so, should the trigger be based on the level of risk or something else?	<p>The Māori Trustee considers that national direction should set a requirement for local adaptation planning to be undertaken. Councils should be required to undertake early and meaningful engagement with their communities throughout the planning process and provide Māori with the opportunity to set their level of involvement. It will be crucial to the success of local adaptation planning to ensure that communities feel as though they are part of the process and that any adaptation plan reflects the issues and risks they experience.</p> <p>The Māori Trustee agrees that the trigger for adaptation actions should be based on the level of risk. However, the risk framework needs to be informed by both mātauranga Māori and scientifically robust knowledge.</p>
19. What direction should central government provide on the local adaptation planning process?	The Māori Trustee generally agrees with the suggested direction outlined in the consultation document ²² . The Māori Trustee, in particular, supports the consideration of the Rauora Framework ²³ and the He Ara Waiora Framework ²⁴ . However, to ensure that indigenous methodologies are valued, and intergenerational outcomes are provided for, adaptation planning needs to go beyond considerations and give effect to these frameworks. This will ensure solutions for adaptation and retreat are equitable and beneficial to both Māori and non-Māori.
20. Do you think there should be a requirement to plan for different scenarios, such as changes in the level of risk or what happens if there is a disaster? Why or why not?	The Māori Trustee considers that there should be a requirement to plan for different scenarios as it is unlikely that any one climatic event or disaster will have the exact same impact on different communities. Planning for different scenarios will allow for transparent expectations and will enable communities to become climate resilient through being prepared to act if, or when, there is a change in the level of risk.
21. How can we make sure that local adaptation planning is inclusive and draws on community views?	<p>The Māori Trustee considers that to ensure local adaptation planning is inclusive and draws on community views, national direction needs to expressly provide for it. In addition to the suggestions in the consultation document²⁵, this could include:</p> <ul style="list-style-type: none"> • providing for hui/wananga to be held in local marae as well as community centres or halls to ensure all participants are comfortable; • enabling Māori landowners and communities to be part of decision making processes; and • providing guidance for local authorities on whenua Māori and the particular challenges faced by Māori landowners in adaptation or managed retreat.
22. Who do you think should make decisions about the adaptation pathway we choose and why? How should others be involved in the process?	The Māori Trustee considers Central Government, local authorities, Māori, hapū, iwi and the wider community should be part of any decision making on adaptation pathways. For any adaptation plan to be successful the values, issues, and risks identified by communities need to be considered, understood

²² [Community-led-retreat-Issues-and-options.pdf \(environment.govt.nz\)](#), p.44.

²³ [Exploring-an-indigenous-worldview-framework-for-the-national-climate-change-adaptation-plan.pdf \(environment.govt.nz\)](#)

²⁴ [He Ara Waiora - brief overview A3.pdf \(treasury.govt.nz\)](#).

²⁵ [Community-led-retreat-Issues-and-options.pdf \(environment.govt.nz\)](#), p.45.



	<p>and visible throughout the planning process from formation to implementation. The Māori Trustee also supports the emphasis in the consultation document on ensuring that the preamble to Te Ture Whenua Māori Act 1993 is supported²⁶.</p> <p>The Māori Trustee broadly agrees with the core design elements for a decision-making framework identified in the consultation document²⁷. However, there needs to be an ability to assess previous adaptation decisions and their outcomes to help inform future decision making.</p>
<p>Community-led retreat</p>	
<p>23. What do you think are the most important outcomes and principles for community-led retreat?</p>	<p>The Māori Trustee considers that the following outcomes and principles, in addition to those highlighted in the consultation document²⁸, are important for any community-led retreat system:</p> <ul style="list-style-type: none"> • Ensuring equitable outcomes are provided for at all stages of a retreat process, including for future generations; • Ensuring that any process is cognisant of the cultural, social, economic, health and well-being needs of communities and individuals; • Ensuring that there are empowering provisions in legislation for decision makers to retreat, where the risk makes it appropriate, and it is desired by the community; • Ensuring plans and processes are dynamic and flexible to acknowledge that each community-led retreat process will be different and no one case is likely to be the same; and • Ensuring that, where possible, the whenua and te taiao can be protected and nature-based solutions are prioritised. <p>The Māori Trustee also considers that the below whakataukī should be included to guide the outcomes and principles of a community-led retreat system:</p> <p><i>“Ka mate kāinga tahi, ka ora kāinga rua. When the first home dies, a second home comes to life”.</i></p> <p>This whakataukī captures the essence of retreat, particularly with regards to whenua that has been taken by nature, such as coastal inundation. Māori have learnt through historical practices and mātauranga about when to retreat or move from an area due to the risks of natural disasters²⁹. Therefore, the concept of adapting to changing environments is not foreign to Māori.</p>
<p>24. Do you prefer option 1 (voluntary) or option 2 (a mix of voluntary and mandatory parts)? Are there any other options?</p>	<p>The Māori Trustee considers option 2 – a system with voluntary and mandatory parts – is an appropriate option that allows individuals and/or communities to retreat early if they wish, while ensuring that those who stay are not risking their life or that of anyone else and that economic circumstance (affordability of retreat) is not forcing a decision to stay.</p> <p>However, the Māori Trustee considers there needs to be clear direction within a retreat system that identifies scenarios where mandatory retreat would be required and clarity around when voluntary retreat would be supported at both a local and central government level.</p>
<p>25. Do you agree that affected land should no longer be used at the end of a retreat process (with limited exceptions for things like ceremonial events, recreation, some agriculture, or horticulture uses and mahinga kai gatherings)? Why or why not?</p>	<p>The Māori Trustee agrees that land should no longer be utilised for residential purposes at the end of a retreat process, if that retreat process is mandatory. However, there should be exceptions to utilise the whenua for things such as ceremonial events, recreation, mahinga kai, agriculture and horticulture uses. This will ensure Māori retain a whakapapa connection to their whenua and cultural practices can continue to occur.</p> <p>The Māori Trustee also considers that, where practicable, exceptions for agriculture and horticulture uses will also enable Māori landowners, farmers, and rural communities to continue to cultivate the land and generate a source of income. This is particularly important for Māori landowners as whenua Māori is generally located in rural areas and utilised for agricultural and horticultural purposes³⁰. The Māori Trustee considers that, if exceptions are not</p>

²⁶ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 47.

²⁷ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 47.

²⁸ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 50.

²⁹ [Mātauranga Māori—the ūkaipō of knowledge in New Zealand \(tandfonline.com\)](#), p.7.

³⁰ For example, of the land administered by the Māori Trustee, the average land size is 48 hectares with 52% of our actively managed leases being utilised for pastoral purposes, 20% for dairy, 11% horticultural/cropping, 7% for forestry and 10% for other uses (commercial, residential, access, unutilised).



	<p>provided, the Māori economy will disproportionately be negatively affected and impacted Māori freehold land blocks would effectively be alienated. Any retreat process would need to ensure equitable outcomes are achieved.</p> <p>However, the Māori Trustee considers that where the retreat process is voluntary, and the natural hazard can be mitigated through adaptation, there should be a mechanism to allow for residential purposes to continue. This could be linked to the community's risk tolerance, and how manageable they perceive the risks to be. The determinants of an individual or community's risk appetite for potential the cultural, spiritual, health and safety, social, environmental, and economic impacts, will differ from case to case. However, the Māori Trustee also considers there needs to be clear measures in place to ensure that the risk of staying is not worsened (eg. By restricting new developments that could lead to greater exposure to risks from natural hazards and by providing transparency around risk exposure before re-occupation).</p>
<p>26. Do you think there should be any other exceptions? If so, what, and why?</p>	<p>The Māori Trustee considers the following exceptions to land use should be included, where practicable:</p> <ul style="list-style-type: none"> • practice of tikanga or kawa; • mara kai opportunities; • the gathering of Rongoa Māori; • access to mahinga mātaītai; • preserving and protecting wāhi tapu, wāhi tipuna and pā sites or locations recognised by planning instruments of Sites and Areas of Significance to Māori (SASM); and • activities that provides protection as well as use such as erosion planting with grazing amongst it and native bush stands for protection. <p>These exceptions correlate with the exceptions already identified in response to Question 25 as they provide for Māori to maintain a whakapapa connection to their whenua and carry out their cultural practices.</p>
<p>27. Do you agree that these powers are needed to ensure land is no longer used once a decision has been made to retreat? What powers do you consider are needed?</p>	<p><u><i>Māori Freehold Land Following a Decision to Retreat</i></u></p> <p>Following a decision to retreat, the Māori Trustee considers that owners of any Māori Freehold Land should retain the title in their name, to maintain their whakapapa connection to the land and recognise that it continues have the status of Māori land, even if the land is no longer able to be used. There are a range of planning, legal or legislative mechanisms for ensuring that the ownership of the land remains with the Māori owners and that the status remains Māori land, while restricting land use.</p> <p>Importantly, the Māori Trustee considers that any powers that result in the compulsory acquisition of land should only be exercised on land that is freehold land in general title and not Māori Freehold land. Compulsory acquisition should not be used to acquire any Māori freehold land which, as suggested in the consultation document³¹, should remain within its ownership structure and status. Unless the owners supported the sale of the land (to the threshold required under Te Ture Whenua Māori 1993), the Māori Trustee does not consider that acquisition by agreement is appropriate for Māori freehold land.</p> <p><u><i>Freehold Land in General Ownership Following a Decision to Retreat</i></u></p> <p>The Māori Trustee broadly agrees that powers to acquire by agreement freehold land titles in general ownership are needed to ensure land is no longer used, once a decision has been made to retreat. If acquisition by agreement is not possible, compulsory acquisition provisions of the Public Works Act 1981 will apply.</p> <p>Furthermore, the Māori Trustee reiterates her submissions made in Question 12 that the retreat process presents an opportunity for the the Crown and/or local authorities to engage with local hapū, iwi and Māori to understand if there is interest in that land being available to Māori for cultural purposes, notwithstanding that its use will be restricted by the risk associated with the land.</p>

³¹ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 53.



<p>28. What do you think the threshold or trigger should be for withdrawing services once a decision has been made to retreat?</p>	<p>The Māori Trustee considers that option A – a plan for the withdrawal of services to be included in a retreat plan – is the most appropriate mechanism. This allows communities and service providers to be involved in deciding what is appropriate for that community and provides clarity for what will happen if/when retreat is carried out to both the community and the providers.</p> <p>However, in cases where no plan has been adopted, the Māori Trustee considers the default position should be that service providers should withdraw at the end of a retreat process where a decision to retreat has been made. This is because it may take longer than anticipated to retreat communities from an area, and they should not be left without any access to water, electricity, telecommunications or roading. It is likely that this will have additional costs, however, it provides for an equitable outcome for communities.</p>
<p>29. In what circumstances, if any, do you think decision-makers should be protected from liability? What are your views on option A, options B or any other possible option?</p>	<p>The Māori Trustee is generally comfortable with option B – exclusions from all liability where decision-makers act in good faith, except in circumstances of failure to act or misfeasance.</p> <p>The Māori Trustee considers there should be some exemptions from liability for decision-makers in circumstances where they act in good faith and make reasonable decisions based on the available information. However, the Māori Trustee considers it important that ‘affordability’, in terms of resources, time or actual costs, should not impact a decision-maker’s ability to undertake or offer the best options available for adaptation or retreat. Removing affordability concerns will therefore be important.</p>
<p>Funding and financing</p>	
<p>30. Which parts of the current system work well and which do not? Are there any other issues with our current approach to adaptation funding?</p>	<p>The Māori Trustee considers the current system for funding adaptation does not work well for whenua Māori. This is primarily due to the inherent difficulties Māori landowners encounter when it comes to lending and servicing debt – as banks generally do not allow Māori freehold landowners to borrow against their land. The ability for Māori landowners to fund their own adaptation solutions and become climate resilient is hindered further by the modest returns³² generated by their, often under- or undeveloped, Māori land blocks. This also results in assets on their whenua often being under or uninsured and heightens their risk exposure to a natural hazard event. Therefore, the principle of beneficiary pays that currently underpins the system does not, and will likely not, work for whenua Māori.</p> <p>Furthermore, the Māori Trustee has serious concerns with the current grant funding system that continues to be based on an owner-occupier model of land use which disregards the complexities and nuances of whenua Māori³³ ownership and governance structures. This funding system was used in response to Cyclone Gabrielle which, in the Māori Trustee’s experience, was a taxing process given the time it took to prepare individual applications for multiple land blocks without necessarily being able to assess the full damage and impact in the affected areas or receive funding that would cover the full extent of the works required. This meant that funding would likely benefit owner-occupiers who were able to respond faster. Therefore, for a future system to work for whenua Māori, the grant would need to cover the full extent of the works required to adapt through recovery and allow for larger land-holding entities, like the Māori Trustee, to apply for multiple blocks under one application.</p>
<p>31. What do you think are the most important outcomes and principles for funding adaptation?</p>	<p>The Māori Trustee considers that, given the prevailing barriers that Māori landowners encounter with lending and borrowing, it is very important that funding for adaptation achieves fair and equitable outcomes. As highlighted previously, a vast majority of Māori land blocks earn modest incomes with limited ability to meet basic costs and often an inability to access debt funding. Therefore, to ensure funding is fair and equitable and Māori landowners are afforded the same opportunities to adapt to climate change as owners of general land are, the criteria should not be based on a first-in-first-served principle.</p> <p>Furthermore, the Māori Trustee broadly supports the outcomes and principles for funding adaptation highlighted in the consultation document.</p>

³² 73% of blocks administered in the Māori Trustee’s portfolio generate less than \$10,000 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 with costs to become climate resilient or meet compliance costs for new local and central government environmental regulations.

³³ Whenua Māori is generally small in size with marginal land classes that makes it not economically viable in its own right. It often has multiple ownership interests and is leased by neighbouring properties at income levels that are barely able to cover costs.



<p>32. In what circumstances (if any) do you think ratepayers and taxpayers should help people pay for the costs of adaptation?</p>	<p>The Māori Trustee considers that enduring funding solutions need to be established to assist individuals and communities pay for the costs of adaptation and retreat. The Government’s current reactive response to post-event recovery is unsustainable and will likely lead to inequitable outcomes as budgets become tighter and funds dwindle.</p> <p>The Māori Trustee considers it an opportune time for the Government to establish a funding/general insurance scheme, similar to ACC, that seeks to fund actions related to climate adaptation and retreat.</p> <p>The Māori Trustee envisions that such a scheme could:</p> <ul style="list-style-type: none"> • Be administered by the Earthquake Commission (EQC). • Establish an investment fund to grow the funds available for adaptation and managed retreat actions such that the money required from contributors remains reasonable over time and ensures intergenerational equity. • Be structured to assist owners and occupiers with the costs of adaptation or retreat in a principled, equitable manner, that recognises the challenges that owners of particular types of land, such as Māori Freehold Land, may face. <p>The Māori Trustee acknowledges that the establishment of such a scheme, including the technical questions around how such a scheme will be funded and distributed, will raise questions around equity that will need to be addressed. However, not establishing a comprehensive, transparent and enduring approach to funding climate adaptation and retreat actions will also lead to inequitable outcomes and additional, unknown, costs to all taxpayers and ratepayers. A detailed funding study should be undertaken the public should be consulted on any options.</p> <p>The Māori Trustee would welcome the opportunity to discuss her ideas on enduring and equitable funding options with Ministry for the Environment officials.</p>
<p>33. In what circumstances should central government help councils to meet adaptation costs?</p>	<p>The Māori Trustee considers that Central Government could help councils, in the short-term future, to meet adaptation costs in situations where costs are likely to be exponential due to the level of risk exposure within an area. As stated in the consultation document³⁴, some councils will lack the financial capacity to adequately invest in and respond to adaptation where needed in the short-term future. Therefore, it will be important that the Government provides financial support to ensure landowners and communities are not disadvantaged and have equal opportunity to become climate resilient. However, the Māori Trustee reiterates her points made to Question 32, that enduring solutions for funding need to be established.</p> <p>Furthermore, the Māori Trustee supports the development of metrics that identifies which Councils may need funding and their specific areas of need. Funding support should be provided on a case-by-case basis to reflect regional circumstances as set out in the consultation document³⁵.</p>
<p>34. What are the benefits and challenges of providing financial support to people needing to retreat?</p>	<p>The Māori Trustee considers that some of the benefits of providing financial support to people needing to retreat includes:</p> <ul style="list-style-type: none"> • giving people an equal opportunity to retreat if they need to, even when they do not have the financial means; and • reducing people’s risk exposure during the retreat process. <p>The Māori Trustee considers that some of the challenges of providing financial support to people needing to retreat includes:</p> <ul style="list-style-type: none"> • the costs and potential financial strain on the system if an entire community or multiple communities need to retreat at the same time; and • ensuring equitable outcomes for Māori landowners are available, given the complexities of whenua Māori ownership structures and the potential difficulties in administering financial support.
<p>35. Are there any other approaches for providing support to people needing to retreat that we should consider?</p>	<p>The Māori Trustee reiterates her points made in Question 32 that enduring funding solutions need to be established. However, she also considers that the most effective and equitable approach to support Māori landowners in any retreat process is through providing targeted funding and resources. This is fundamental in ensuring Māori landowners are equipped with robust and concise information, capability, capacity, and tools to make informed decisions.</p>

³⁴ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 66.

³⁵ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 66.



36. What are the benefits and challenges of providing financial support to businesses needing to retreat?	No comment.
37. What should central government's initial funding priorities be and why? Which priorities are the most important and why?	<p>The Māori Trustee considers that there are three areas of equal priority which should be initial targets for Central Government funding. These are:</p> <ul style="list-style-type: none"> • iwi, hapū and Māori adaptation funding; • flood resilience infrastructure and nature-based solutions; and • home resilience funding and property-level retreat funding. <p>All matters highlighted in the consultation document³⁶ are important, however, given past inequities and the disproportionate impact climate change is likely to have on Māori and whenua Māori, funding iwi, hapū and Māori adaptation should be a priority. Additionally, flood resilience infrastructure and nature-based solutions should also be prioritised to ensure councils are adequately resourced to upgrade their infrastructure and prevent poor adaptation measures. The Māori Trustee also considers that home resilience funding and property-level retreat funding are of equal importance as communities and individuals should be supported in increasing their resilience and adapting to, or retreating from, natural hazards.</p>
38. How could central government communicate its investment priorities? Please indicate which option you think would be most effective and explain why.	<p>The Māori Trustee considers option 1 – a statement of spending priorities through a government policy statement, to be an appropriate way for Government to communicate its investment priorities. Aligning investment priorities for adaptation funding with the National Adaptation Plan (NAP) could also enable a more cohesive and streamlined process that is recorded on, and accessible from, a single platform.</p> <p>The Māori Trustee notes that while option 3 provides flexibility to update investment priorities at each budget, it risks not setting long-term enduring funding goals, which may undermine the country's long-term climate resiliency. The Māori Trustee reiterates her points made in Question 32 that enduring funding solutions need to be established.</p>
39. Should funding priorities cover councils as well as central government?	<p>The Māori Trustee considers that it could be helpful if funding priorities cover Councils as well as Central Government. This would allow for a transparent process and enable communities to understand where funding for adaptation is going, and how much Councils are spending to become climate resilient in terms of their infrastructure. It would also assist Councils to understand where spending should be directed. Additionally, it could be useful for each Council to know how much the others are spending on adaptation based on their exposure or level of risk.</p>
40. How can the banking and insurance sectors help to drive good adaptation outcomes?	No comment.
41. What solutions should be explored for funding and financing adaptation?	<p>The Māori Trustee considers the following solutions should be explored for funding and financing adaptation:</p> <ul style="list-style-type: none"> • targeted funding for Māori landowners, whānau, hapū and iwi to enable them to adapt to the impacts of climate change; and • establishing an adaptation/retreat fund managed by EQC. Please refer to our answer to Question 32.
Adapting through recovery	
42. Are there any other issues that make it difficult to adapt during a recovery?	<p>The Māori Trustee considers the cost of adaptation and long-term funding solutions is unclear and will make it difficult for people to adapt through a recovery. Whilst the Government's prompt funding solution following Cyclone Gabrielle was necessary for communities to recover, the Māori Trustee reiterates the point that the grant funding system continues to be based on an owner-occupier model of land use which does not take into account for the complexities and nuances of whenua Māori³⁷ ownership and governance structures. The application process limited the Māori Trustee's ability to apply for multiple land blocks at once, given the owner-occupier model. The Māori Trustee therefore considers that any cost to adapt after a recovery should recognise and provide for the complexities associated with whenua Māori administration and governance structures.</p>

³⁶ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 70-71.

³⁷ Whenua Māori is generally small in size with marginal land classes that makes it not economically viable in its own right. It often has multiple ownership interests and is leased by neighbouring properties at income levels that are barely able to cover costs.



<p>43. Do you think our approach to community-led retreat and adaptation funding should be the same before and after a disaster? Why or why not?</p>	<p>The Māori Trustee considers that the approach to community-led retreat and adaptation funding should be different before and after a disaster, as post-disaster recovery could result in different outcomes (i.e. adaptation measures or retreat) and therefore different funding approaches will be needed. The Māori Trustee broadly supports the principles listed in the consultation document³⁸ to include in such a framework. Please refer to our answer to Question 32 for enduring and equitable funding options.</p>
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³⁸ [Community-led-retreat-issues-and-options.pdf \(environment.govt.nz\)](#), p. 79.