

The Māori Trustee submission on
Bay of Plenty Regional Council's
Draft Rotorua Geothermal
System Management Plan

December 2023

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Rotorua Geothermal System Management Plan
Bay of Plenty Regional Council
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Tēnā koe

Submission on the Draft Rotorua Geothermal System Management Plan

1. The Māori Trustee administers, as trustee or agent, approximately 88,000 hectares of Māori freehold land on behalf of about 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 can be found on Te Tumu Paeroa's website, www.tetumupaeroa.co.nz.
2. The views expressed in this submission on the Draft Rotorua Geothermal System Management Plan (Draft Plan) are those of the Māori Trustee's as the single largest trustee and agent of Māori land.
3. The Māori Trustee administers 189 blocks (8,044 hectares) within the Bay of Plenty region, representing approximately 36,182 beneficial ownership interests. However, only one of these blocks is located within the 'Indicative boundary of the Rotorua Geothermal System'. The Māori Trustee acknowledges that the views expressed in this submission may not be shared by some owners of the land impacted by the Draft Plan. Further, and to labour the point, the Māori Trustee does not speak for or otherwise represent iwi, hapū or other holders of Māori land, some of whom are likely to submit on this Draft Plan.
4. The Māori Trustee broadly supports the vision, principles and proposed approach set out in the Draft Plan, however, the following matters should be given consideration.

Monitoring of the reinjection of cooler fluids

5. The Māori Trustee considers that the Draft Plan needs to provide further clarification on how the reinjection of cooler fluids will be monitored across the system. The Māori Trustee is concerned that insufficient monitoring of this process may result in contamination and localised cooling, which could directly impact the land she administers. To reduce ambiguity, the Draft Plan should:
 - Address how the reinjection of cooler fluids will be monitored across the system in terms of volume and depth; and
 - Include reservoir modelling that utilises sensitivity analysis to show the contrast associated with cooler fluids entering the system at varying depths.

Support for an integrated management approach

6. The Māori Trustee supports an integrated management approach for the Draft Plan. An integrated management approach will help coordinate extraction activities to ensure the sustainable use of



Rotorua's geothermal resource. This approach is particularly important considering there are multiple users taking from varying depths of the reservoir.

Engagement with Māori freehold landowners

7. The Māori Trustee supports the strong direction within the Draft Plan for Māori to be active participants in the plan's implementation and management of the Rotorua geothermal system. However, the Māori Trustee is concerned that the current terminology used within the Draft Plan unintentionally excludes Māori freehold landowners from participating within the system unless they do so through their affiliated iwi, hapū or marae group (haukāinga). The implementation of the Draft Plan and management of Rotorua's geothermal system will likely have a direct impact on Māori freehold land and Māori freehold landowners, in terms of their current and future access to geothermal resources. It is therefore imperative that Māori freehold landowners are given the opportunity to participate within the system to have their individual and collective issues heard.
8. The Māori Trustee therefore considers that the Draft Plan should be amended to expressly provide for the participation of Māori freehold landowners through either using the all-encompassing term mana whakahaere¹ or including Māori freehold landowners alongside references to iwi, hapū and haukāinga within the plan.
9. The Māori Trustee would welcome the opportunity to discuss her submission with staff from the Bay of Plenty Regional Council.
10. My Executive Assistant, [REDACTED] can be contacted on [REDACTED] or by email at [REDACTED]

Ngā manaakitanga,

Dr Charlotte Severne

Māori Trustee

¹ Mana whakahaere: Iwi, hapū, ahi kā (Māori landowners) who exercise mana whakahaere (authority) and other obligations (kaitiakitanga and manaakitanga) to a particular area, water source, space and resource.