

The Māori Trustee submission on the  
Second Emissions Reduction Plan  
Tā Aotearoa mahere whakaheke  
tukunga tuarua 2026-2030

August 2024

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Tēnā koe

## Second Emissions Reduction Plan Tā Aotearoa mahere whakaheke tukunga tuarua 2026-2030

Thank you for the opportunity to provide feedback on the proposed Second Emissions Reduction Plan.

### Introduction

1. The Māori Trustee is appointed by the Minister for Māori Development under the Māori Trustee Act 1953. 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.
2. The role of the Māori Trustee is to provide professional administration and management of whenua Māori and assets, in accordance with the Māori Trustee Act 1953, other relevant legislation<sup>1</sup> and the principles and obligations of trusteeship and agency. A primary objective of the Māori Trustee is to protect, utilise and grow the assets of our Māori landowners.
3. Te Tumu Paeroa is the organisation that supports the Māori Trustee to undertake her functions, duties and responsibilities.<sup>2</sup> Te Tumu Paeroa is unique, in that it is the only nation-wide organisation managing significant tranches of Māori land and assets on behalf of Māori landowners. The organisation provides professional trustee or agency services, and targeted development and sector-specific expertise, to one third of all Māori land trusts (over 1,746 trusts). The organisation also manages several Māori enterprises and development projects.
4. The Māori Trustee administers extensive landholdings that are directly impacted by changes to agriculture and forestry policy. Presently, the Māori Trustee's portfolio encompasses approximately 82,000 hectares of whenua (mostly Māori freehold land), and this is managed by 1,746 individual Māori land trusts representing over 100,000 landowners. The average land size in the Māori Trustee's portfolio is about 50 hectares with 52% of the land held under lease being utilised for pastoral purposes, 20% for dairy, 7% for forestry, 11% horticulture/cropping and 10% other uses (commercial, residential, access, unutilised). Approximately 5,000 hectares is pre-

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<sup>1</sup> Primarily the Trusts Act 2019 and Te Ture Whenua Māori Act 1993.

<sup>2</sup> Additional information can be found on Te Tumu Paeroa's website, [www.tetumupaeroa.co.nz](http://www.tetumupaeroa.co.nz).



1990 forest and there is significant potential for new forests to be planted on marginal land to join the ETS voluntarily.

5. The views in this letter represent the Māori Trustee's position as the single largest trustee and agent of Māori land. However, given the scale and varied nature of the land within the Māori Trustee's portfolio, some owners of lands the Māori Trustee administers may have different views than those expressed below.

## **Position**

6. The Māori Trustee has concerns regarding the potential impact of the Second Emissions Reduction Plan (ERP2) on Māori landowners. ERP2 does not adequately account for the characteristics of Māori land<sup>3</sup>. The Māori Trustee's portfolio consists mostly of land blocks that are small in size, not economically viable in their own right, have multiple ownership, are on marginal land classes<sup>4</sup>, have minimal improvements, are sometimes un-occupied and are frequently leased to neighbouring properties at income levels that often do not cover costs. These characteristics are common to large tracts of Māori land. For Māori to effectively participate in emissions reductions, these matters need to be considered and addressed.
7. The Māori Trustee would like the Ministry to consider and address the following views in producing final advice on the ERP2 to the Minister:

### *ERP2 approach and opportunities for Māori*

- a. The proposed ERP2 lacks detail about how policy frameworks and initiatives will be implemented. More detail is required to enable assessment of opportunities for Māori and Māori landowners to undertake emissions reductions and removals activities on their whenua.
- b. Lack of targeted funding, difficulties to borrow and service debt, and challenges with governance of Māori land are barriers to Māori landowners reducing their emissions and increasing the resilience of their whenua. Over 16,000 Māori land blocks in Aotearoa do not have a governance structure<sup>5</sup> and for those that do, the vast majority often earn very modest incomes<sup>6</sup>. The reality for most Māori landowners is that they simply do not have funds to implement emissions reduction initiatives without assistance.
- c. The Māori Trustee is concerned that there is not a clear and detailed strategy for Māori participation in the emissions reductions plan.

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<sup>3</sup> Impacts of ERP 2 are not modelled. Refer to the Ministry for the Environment 2024. New Zealand's second emissions reduction plan (2026–30): Technical annex to the discussion document. Wellington: Ministry for the Environment *Appendix 2 Intervention logic mapping* and the *Appendix 3 Assumptions used in policy modelling*.

<sup>4</sup> NZ LUC classes 6,7 and 8 make up 59,650 ha or 70% of the Māori Trustee's portfolio.

<sup>5</sup> Māori land update: [Māori Land Update – Ngā Āhuatanga o te whenua June 2022](#)

<sup>6</sup> As an example, 73% of blocks administered in the Māori Trustee's portfolio generate less than \$10,000 per annum and 58% generate less than \$5,000. Approximately 30% of our Māori landowning entities cannot afford to pay all or part of Te Tumu Paeroa's annual base trustee fee of \$1,450.



- d. Approximately 70% of the land administered by the Māori Trustee is classed as marginal land<sup>7</sup> and covered by indigenous vegetation<sup>8</sup>. Any changes to land use policy will disproportionately affect Māori land and Māori landowners.

#### *NZ ETS*

- e. Most Māori land is held in small parcels and the complexity and high administration costs of the current ETS does not encourage Māori participation.

#### *Agriculture*

- f. Barriers to farmer uptake of emissions reduction technology relate largely to affordability, lack of incentives and uncertainty of achieving results. These barriers can be compounded when the farmer is leasing Māori land because the increase in costs to current and prospective lessees, will make marginal land blocks appear uneconomic and unattractive to lease. Further, the lessee may simply relinquish the lease as a way of reducing livestock numbers and emissions in their farming enterprise.
- g. To ensure any future pricing system is equitable for Māori land and Māori landowners, underdeveloped/marginal Māori land will require support with development, implementation, transitional support, and administration. Any pricing system needs to have regard to the existing and historical inequities experienced by Māori landowners and not disincentivise the development of Māori land.

#### *Forestry*

- h. Improving access to capital will be critical for Māori landowners to unlock potential benefits from forestry or alternative canopy covers and to reduce net emissions.

#### *Non-Forestry Removals*

- i. The Māori Trustee is broadly supportive of non-forestry removals as this will recognise and reward the natural capital, ecosystem services and biodiversity that whenua Māori contributes. However, the mechanism to do so needs to ensure that costs do not outweigh benefits or are inequitable.

#### *Support for Emissions Reduction and Climate Adaption*

- j. The topography of the land the Māori Trustee administers makes it more susceptible to climate events. It will be very important that adaption and retreat processes mitigate these effects and are properly funded for Māori landowners. Emissions reduction will increase the costs to Māori<sup>9</sup> and Māori land and this impact should be addressed through Government support.

#### *In Closing*

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<sup>7</sup> NZ LUC classes 6,7 and 8 make up 59,650 ha or 70% of the Māori Trustee's portfolio.

<sup>8</sup> 42% of Māori land (572,487 ha) is in natural forest compared to 12% of general title land. Of the Māori Trustee's portfolio 32% is in natural forest.

<sup>9</sup> Refer to Principal Economics May 2024 *Economic Impact of New Zealand's Second Emission Reduction Plan* Page 39 section 3.4.



8. I would welcome the opportunity to discuss any matters raised in this letter with the ERP2 Climate Consultation Team.

Ngā manaakitanga,

**Dr Charlotte Severne**  
Māori Trustee