

Submission	Party	Represented by	Stated nature of interest in geothermal resources
1 (#3.2.367)	The Tongariro Power Development Scheme Lands Claim (Wai 1196)	Darrell Naden and Vanshika Sudhakar	<p>Counsel submit that the party has geothermal interests in and around the Tokaanu geothermal field, situated in the Waikato at the southern end of Lake Taupō.</p> <p>Counsel submit that the Tongariro Power Development scheme (the TPD scheme) has significantly affected the waterways in and around the Tokaanu geothermal field and thus the geothermal field as well.</p> <p>Further, counsel submit that little has been done to alleviate the party’s concerns with the effects of the TPD scheme despite earlier complaints to the National Park Tribunal and other Tribunals.</p>
2 (#3.2.367)	The Kerikeri Inlet and Lake Omapere Waterways (Mitchell) Claim (Wai 1716)	Darrell Naden and Vanshika Sudhakar	<p>Counsel submit that the party’s geothermal interests lie in and around Lake Ōmāpere, situated in Te Taitokerau.</p> <p>Their claim interests include the Ngāwhā geothermal field and associated aquifers.</p>
3 (#3.2.368)	Contact Energy Limited	David Randal and Cerridwen Bulow	<p>Contact Energy Limited (‘Contact’) owns and operates the Ohaaki, Te Huka, Pohipi, Wairakei, and Te Mihi Geothermal Power Stations in the Waikato region. Counsel submit that these power stations, on the Ohaaki, Tauhara, and Wairakei geothermal fields, have a power generation capacity which equates to 8 percent of the total generation capacity in New Zealand, and approximately half of the total geothermal energy generation in New Zealand.</p> <p>Contact is also currently constructing the Tauhara II Geothermal Development Project, which they say will increase Contact’s geothermal generation capacity to 10 percent of New Zealand’s total geothermal generation capacity.</p> <p>Counsel submit that geothermal resources and Crown policies and the legal framework (including proposed reforms) for managing and allocating such resources are fundamental to Contact’s operations. Current and proposed laws for managing and allocating geothermal resources are fundamental to the operation of its business.</p>

			<p>Counsel submit that Contact has an interest in these proceedings apart from an interest in common with the public, in terms of s 4A of the Commissions of Inquiry Act 1908. Contact seeks to monitor the Tribunal's inquiry on a watching brief basis and will be available to assist the Tribunal by providing factual information about its establishment, interests, and operations. Counsel advise that Contact may seek leave to file evidence or present submissions at a later date.</p>
4 (#3.2.372)	The Freshwater Iwi Leaders Group (ILG)	Jamie Ferguson	<p>Counsel advises that that in respect of the ILG's role and interests, the ILG confirms that:</p> <ul style="list-style-type: none"> <li>(a) the ILG was formed in 2007 at a national hui of iwi held at Pukawa Marae to engage with the Crown and advance issues concerning freshwater;</li> <li>(b) the ILG operates under the mantle of the National Iwi Chairs Forum as part of its Te Pou Taiao group (which also includes ILGs relating to biodiversity and climate change) and is subject to direction from the National Iwi Chairs Forum;</li> <li>(c) the ILG has reported to and maintained its mandate at successive meetings of the National Iwi Chairs Forum (which generally meets four times each year in different parts of the motu)</li> <li>(d) the ILG is currently mandated by the National Iwi Chairs Forum to engage with the Crown on issues concerning, among other things, freshwater and resource management; and</li> <li>(e) the ILG, supported by an Iwi Advisors Group, has: <ul style="list-style-type: none"> <li>i. been engaged with successive administration since 2007 in relation to freshwater and resource management issues; and</li> <li>ii. has held regular regional hui with iwi and hapū throughout the motu (and is commencing a further round of regional hui this month in relation to the Crown's present resource management reforms and the issue of freshwater rights and interests).</li> </ul> </li> </ul> <p>In terms of geothermal resources, counsel submits that the ILG's interest is in the recognition of the rights and interests of iwi, hapū, and Māori landowners in respect of geothermal resources as well as the appropriate recognition of those rights and</p>

			<p>interests. Counsel submits that freshwater necessarily includes geothermal resource.</p> <p>Counsel submits that as a representative iwi collective presently engaged with the Crown in its current reform process, the ILG has a unique and relevant interest in matters that are proposed to be within the scope of stage three of the Wai 2358 Inquiry.</p>
5 (#3.2.370)	The Ngāti Ruakopiri Waimarino Block Alienation Claim (Wai 1072)	Mark McGhie	<p>Counsel submits that the Wai 1072 claimants have geothermal interests in the central North Island, around Lake Taupō and at Mount Ruapehu.</p> <p>Areas of particular significance are:</p> <ul style="list-style-type: none"> <li>(a) Waipahihi 4H, where the claimants allege that the geothermal resource is being degraded through extractions by neighbouring motels and commercial hot pools.</li> <li>(b) Tokaanu Township, where the claimants allege that the geothermal resource is polluted, used commercially, and where local councils attempt to alienate the resource from the claimants.</li> <li>(c) Ruapehu Crater Lake, where the Department of Conservation has failed to consult with Ngāti Ruakopiri on any matter concerning the crater lake and which is not protected by the Resource Management Act 1991.</li> </ul> <p>Counsel advises that the Wai 1072 claimants view the geothermal resources associated with their land to be a taonga protected by the Treaty of Waitangi.</p>
6 (#3.2.371)	The Savage Whānau Trust	Paul Harman	<p>Counsel submits that the Savage Whānau Trust are beneficial owners in the Bath Trust and Farm Trust and that their Māori freehold lands and geothermal resources are adjacent to the Tasman Pulp and Paper Mill, which, counsel submits, discharges trade waste into the geothermal area known as 'Te Kete Pounamu'.</p> <p>Counsel submits that the Savage Whānau Trust's interests in geothermal resources ought to be viewed as being of such an unique and representative nature that all parties would benefit from their participation of in the stage three inquiry.</p>

<p>7 (#3.2.378)</p>	<p>Peter James Paul</p>	<p>Janet Mason</p>	<p>Counsel submits that Peter Paul has mana whenua interests in geothermal areas located in:</p> <ul style="list-style-type: none"> <li>(a) the Te Arawa rohe running from the coast at Matatā to the awa and lakes south near the Kaingaroa Forest and Atiamuri;</li> <li>(b) Lake Rotorua and the lakes at Rotoiti, Rotoehu, Rotoma, Okataina, Okareka, Tikitapu and Tarawera; and</li> <li>(c) the awa that run from and between the lakes and out to the coast in the Bay of Plenty.</li> </ul> <p>Further, counsel advises that constituents of Peter Paul have whakapapa links to the geothermal areas set out above.</p> <p>Counsel submits that, having mana whenua interests in the geothermal areas listed above, Peter Paul has an interest in this Inquiry apart from any interest in common with the public, and that Peter Paul should therefore be entitled to appear and be heard in stage three of this Inquiry.</p>
<p>8 (#3.2.377)</p>	<p>Cletus Maanu Paul</p>	<p>Janet Mason</p>	<p>Counsel submits that Cletus Maanu Paul has mana whenua interests in the geothermal areas located in:</p> <ul style="list-style-type: none"> <li>(a) the awa in and around Matatā Bay of Plenty;</li> <li>(b) the islands and sea off of the coast of Matatā and the entire Tarawera River catchment area;</li> <li>(c) the Tarawera River and the entire area following the Tarawera River inland and following the Taupō volcanic zone to Tongariro National Park, including Lake Rotomahana;</li> <li>(d) the Rangitaiki catchment area;</li> <li>(e) the Whirinaki River; and</li> <li>(f) the Wheao River.</li> </ul> <p>Further, counsel advises that constituents of Cletus Paul have whakapapa links to the geothermal areas set out above.</p> <p>Counsel submits that, having mana whenua interests in the geothermal areas listed above, Cletus Maanu Paul has an interest in this Inquiry apart from any</p>

			interest in common with the public, and that Cletus Maanu Paul should therefore be entitled to appear and be heard in stage three of this Inquiry.
9 (#3.2.376)	Ruiha Collier for and on behalf of the Descendants of Wiremu Pou Claim (Wai 1537)	Janet Mason	<p>Counsel submits that the Wai 1537 claimant, Ruiha Collier, has mana whenua interests in the geothermal areas in Ngāpuhi's traditional rohe, including:</p> <ul style="list-style-type: none"> <li>(a) Whangaroa;</li> <li>(b) Taimai;</li> <li>(c) Kerikeri;</li> <li>(d) Pewhairangi;</li> <li>(e) Whangarei;</li> <li>(f) Mangakahia;</li> <li>(g) Mahurangi; and</li> <li>(h) Tāmaki Makaurau.</li> </ul> <p>Counsel submits that the geothermal areas include:</p> <ul style="list-style-type: none"> <li>(a) the Ngāwhā geothermal fields; and</li> <li>(b) Lake Ōmāpere.</li> </ul> <p>Further, counsel advises that the constituents of Ruiha Collier have whakapapa links to the geothermal areas set out above.</p> <p>Counsel submits that, having mana whenua interests in the geothermal areas listed above, Ms Collier has an interest in this Inquiry apart from any interest in common with the public, and that Ms Collier should therefore be entitled to appear and be heard in stage three of this Inquiry.</p>
10 (#3.2.379)	Jane Ruka for and on behalf of the Grandmother Council of the Waitaha Nation under the Waitaha (Te Korako & Harawira) Claim (Wai 1940)	Janet Mason	<p>Counsel submits that the Wai 1940 claimant, Jane Ruka, has mana whenua interests in the geothermal areas in:</p> <ul style="list-style-type: none"> <li>(a) the whole of the South Island/Te Wai Pounamu, Rakiura; and</li> <li>(b) parts of the North Island including: <ul style="list-style-type: none"> <li>i. Hōkianga;</li> <li>ii. Ōpononi;</li> <li>iii. Te Tii Waitangi;</li> <li>iv. Pakiri and Te Whanga o Whangārei Terenga Parāoa;</li> <li>v. North Kaipara;</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>vi. South Kaipara;</li> <li>vii. Mahurangi;</li> <li>viii. Hauraki Gulf and Islands/Tikapa Moana;</li> <li>ix. Coromandel/Waiaua; and</li> <li>x. Tāmaki Makaurau.</li> </ul> <p>Counsel submits that the North Island geothermal areas include:</p> <ul style="list-style-type: none"> <li>(a) Kawarau;</li> <li>(b) Tauranga;</li> <li>(c) Ngāwhā geothermal hot springs;</li> <li>(d) Hahei;</li> <li>(e) Hot water beach/Otua;</li> <li>(f) Taputapu small geothermal system;</li> <li>(g) Kerepehi small geothermal system;</li> <li>(h) Ngatea small geothermal system;</li> <li>(i) Puriri small geothermal system; and</li> <li>(j) Miranda/Kaiaua low energy geothermal resource.</li> </ul> <p>Counsel submits that the South Island geothermal areas include the Alpine Fault Line and associated geothermal resources, and the Hope Fault line and associated geothermal resources.</p> <p>Further, counsel submits that constituents of Jane Ruka have whakapapa links to the geothermal areas set out above.</p> <p>Counsel submits that, having mana whenua interests in the geothermal areas listed above, Ms Ruka has an interest in this Inquiry apart from any interest in common with the public, and that Ms Ruka should therefore be entitled to appear and be heard in stage three of this Inquiry.</p>
11 (#3.2.381)	Desma Kemp Ratima	Janet Mason	Counsel submits that many of Desma Ratima’s constituents are urban Māori who have mana whenua connections throughout Aotearoa, although not to a specific rohe.

			Counsel submits that, as Desma Ratima’s constituents have mana whenua interests in geothermal areas, Desma Ratima has an interest in this Inquiry apart from any interest in common with the public, and that Desma Ratima should therefore be entitled to appear and be heard in stage three of this Inquiry.
12 (#3.2.375)	David Potter for and on behalf of himself and the Ngāti Rangitahi Raupatu Trust under the Ngāti Rangitahi Inland and Coastal Land Blocks Claim (Wai 996)	Janet Mason	<p>Counsel submits that the Wai 996 claimant, David Potter, has mana whenua interests in, and whakapapa links to, the geothermal areas in:</p> <ul style="list-style-type: none"> <li>(a) the awa in and around Matatā, Bay of Plenty;</li> <li>(b) the islands and sea off of the coast of Matatā and the entire Tarawera River catchment; and</li> <li>(c) the Tarawera River and the entire area following the Tarawera River inland and following the Taupō volcanic zone to Tongariro National Park, including Lake Rotomahana.</li> </ul> <p>Counsel submits that, having mana whenua interests in the geothermal areas listed above, Mr Potter has an interest in this Inquiry apart from any interest in common with the public, and that Mr Potter should therefore be entitled to appear and be heard in stage three of this Inquiry.</p>
13 (#3.2.383)	Te Kotahitanga o Ngāti Tūwharetoa	Karen Feint KC	<p>Te Kotahitanga o Ngāti Tūwharetoa is a trust that serves as the post–settlement governance entity for Ngāti Tūwharetoa following the 2018 settlement of their historical Treaty of Waitangi claims.</p> <p>Counsel advises that Te Kotahitanga o Ngāti Tūwharetoa wishes to participate in stage three of the Inquiry, although it has not yet determined whether this will be on an iwi basis or through the hapū.</p> <p>Counsel submits that as uri of the renowned ancestor Ngātoroirangi, who famously called up the geothermal fires from Hawaiki, Ngāti Tūwharetoa have well known rights and interests in their geothermal taonga tuku iho. These rights and interests are summarised in their 2017 Deed of Settlement, where Te Ahi Tāmou feature centrally as one of the pou of the settlement.</p>

			Counsel therefore seeks leave for Ngāti Tūwharetoa to participate in stage three of the Inquiry.
14 (#3.2.373)	The proprietors of Taheke 8C & Adjoining Blocks Incorporation (Taheke 8C)	Andrew Irwin	<p>Counsel submits that Taheke 8C, through its Committee of Management, has always and continues to act as kaitiaki for the geothermal taonga beneath Taheke land, which is encompassed in the Taheke geothermal field.</p> <p>Further, counsel submits that Taheke 8C has been and is investigating the potential of the Taheke geothermal field with the intent to develop and sustainably utilise geothermal steam and fluid in a number of projects.</p> <p>Counsel advises that Taheke 8C has expended considerable resources undertaking investigatory work, including through acquiring resource consents and drilling. Taheke 8C has also entered into a contractual arrangement to investigate and pursue the development of a power plant on Taheke land.</p> <p>Counsel submits that Taheke 8C has a perspective which may be of assistance to the Tribunal's inquiry.</p>
15 (#3.2.366)	The Te Atatu Lands (Auckland) Claim (Wai 914)	Bryce Lyall	<p>Counsel submit that the Wai 914 claimants have an interest in the inquiry greater than the general public in that they are Māori which relate to Ngāti Awa, Ngāpuhi, Ngāti Pou, Te Uri Taniwha, Ngāi Tupoto, and Ngāti Ue hapū, which have a tribal rohe centred in the Ngāwha district and related to the whole geothermal field, which has a 50km radius and includes a number of geothermal areas, soda springs, and other puna.</p> <p>The claimants are closely involved in the issues that this stage will address, including the Three Waters [reform programme], Resource Management Act reform regarding geothermal issues, and local government issues relating to geothermal issues.</p>
16 (#3.2.385)	The Patuhai, Muhunga, and other lands and resources	Darrell Naden and Vanshika Sudhakar	Counsel advise that the Wai 892 claimant states that there is geothermal activity in their traditional rohe, which is situated near Gisborne on the Pātūtahi block. A three to four-metre-high mound has formed on the land, from which steam can be seen rising and from which heat emanates. Counsel submit that in former times kainga were built on the mound to take advantage of the heat.



	Te Whānau ā Kai) Claim (Wai 892)		The Wai 892 claimant states that drilling was carried out on or near the mound over a 10 to 15 year period, with the last of the drilling occurring around 18 months ago. The results of the drilling are not known to the Wai 892 claimant.
17 (#3.2.385)	The Ngāti Pakahi (Aldridge) Claim (Wai 2377)	Darrell Naden and Vanshika Sudhakar	Counsel submit that the Wai 2377 claimants' geothermal interests lie in and around Lake Ōmāpere, situated in Te Taitokerau. Their claim interests include the Ngāwhā geothermal field and associated aquifers. Counsel adduces the brief of evidence of Nuku Aldridge discussing the Northern War, which, inter alia, states (Wai 2358, #D71 at [49] – [50]):  The second battle was staged at Lake Omapere – in relation to our rights over freshwater. The third battle was at Ohaewai – in relation to our rights over geothermal resources... I realise now why we fought so hard at Ngawha to oppose the prison being built there.
18 (#3.2.385)	The Waimiha River Eel Fisheries (King Country) Claim (Wai 762)	Darrell Naden and Vanshika Sudhakar	Counsel submit that the Wai 762 claimant has geothermal interests in and around the Tokaanu geothermal field, situated in the Waikato, at the southern end of Lake Taupō, and that one of the claim issues concerns the Crown's former management of the public hot spring facility located at Tokaanu. Counsel further submit that the aforementioned interests arise through the Wai 762 claimant's Tūwharetoa whakapapa.
19 (#3.2.385)	The Marine and Coastal Area (Takutai Moana) Act (Te Ao) Claim (Wai 2604)	Darrell Naden and Vanshika Sudhakar	Counsel submit that they have only recently received instructions to act for Wai 2604 in relation to geothermal resources in the claimant's rohe.  Counsel submit that the traditional rohe of the claimant's hapū, Te Whānau ā Te Aotāwarirangi, includes from Tokomaru Bay to Orange Bay (Te Ngutu o Ngore), situated at the southern end of Waipiro Bay. Counsel submit that Te Whānau ā Te Aotāwarirangi's traditional land interests include the Rākau-ā-Tautini, Puketitī, and Te Ahi ā Te Ātua blocks, as well as other inland blocks.  Counsel advise that the Wai 2604 claimant states that a geothermal belt of activity runs through the Waipiro, Te Puia, Puketitī, and Tāwhiti blocks. The Wai 2604 claimant is concerned with the potential for exploitation of the geothermal field in the future and seeks interested party status in order to protect the geothermal resources within Te Whānau ā Te Aotāwarirangi's traditional rohe.

20 (#3.2.386)	The trustees of Tuaropaki Trust	Tara Hauraki and Tyler Paki	<p>Counsel submit that the Tuaropaki Trust (the Trust) holds and administers “part Tuaropaki E Block, situated in Block XVI Whakamaru Survey District Block XVII Atiamuri SD, Block IV Marotiri SD, and Block I Tuhingamata SD” (the Land).</p> <p>Counsel submit that the Land initially comprised approximately 2,700 hectares, which was the result of the amalgamation of over 60 separate land titles. An additional 1,200 hectares of land was subsequently purchased by the Trust meaning that today the total area of the Land is 3,900 hectares. The Land sits over the entire Mokai geothermal field. The rights and interests of the Trust over the Mokai geothermal field includes the right to use, manage and control the Mokai geothermal field.</p> <p>Further, counsel submit that the Trust is heavily involved in geothermal investments and development. The Trust holds 75% of the shareholding in TPC Holdings Limited, the sole shareholder in Tuaropaki Power Company Limited, a geothermal power station located at Mokai which produces and distributes power into the national grid.</p>
21 (#3.2.374)	Mercury NZ Ltd	Te Aopere Dewes and Rachael Jones	<p>Counsel submit that Mercury NZ Ltd (Mercury NZ) has interests, directly and by way of joint venture arrangements in five geothermal stations in the Central North Island’s Taupō Volcanic Zone, namely:</p> <ul style="list-style-type: none"> <li>(a) Ngā Awa Purua (operated by way of a joint venture with the Tauhara North No. 2 Trust);</li> <li>(b) Rotokawa (operated by way of a joint venture with the Tauhara North No. 2 Trust);</li> <li>(c) Ngatamariki;</li> <li>(d) Mōkai (owned together with the Tuaropaki Power Company); and</li> <li>(e) Kawerau.</li> </ul>
22 (#3.2.369)	The trustees of Tauhara North No. 2 Trust	Tania Waikato and Tyler Paki	<p>Counsel submit that the trustees of the Tauhara North No. 2 Trust (the Trust) are the registered proprietors of Tauhara North No 2A, 2B and 2C Blocks (Aggregated) which is a nationally significant geothermal field and covers an area of 326.5000 hectares in total situated in Block XI, XII, XVI Tatua Survey District, ML Plan 22331, situated along the Waikato River between Lake Taupo and Lake Ohakuri.</p>

			<p>Further, counsel submit that the Trust is heavily involved in geothermal electricity generation. The Trust has overseen the construction of two geothermal power stations – Rotokawa commissioned in 1997 and Nga Awa Purua, commissioned in 2010 on Trust land, with a third, Ngatamariki on a neighbouring block commissioned in 2013.</p> <p>In addition, counsel submit that the Trust has considerable involvement in geothermal investment and development. The Trust considers that its experience and expertise would be of assistance to the Tribunal in stage three of the Inquiry. As well as filing its own evidence it may be that the Trust can provide the Tribunal with the benefit of its experience in this sector.</p>
23 (#3.2.391)	Raymond Hall, Titewhai Harawira, John Tamihere, Diane Black, and Rangi McLean (the Tāmaki collective)	Janet Mason	<p>Counsel submits that the Tāmaki collective collectively represent numerous urban Māori in Tāmaki and that these constituents have geothermal interests throughout Aotearoa, in particular in Ngāpuhi and the central and lower regions of the North Island.</p> <p>In addition, counsel submits that there are urban Māori living in Tāmaki who originate from the South Island.</p> <p>Further, counsel submits that Ngāpuhi ‘mana whenua interests in the geothermal areas are throughout Ngāpuhi’s traditional rohe, including:</p> <ul style="list-style-type: none"> <li>(a) the Ngāwhā geothermal fields; and</li> <li>(b) Lake Ōmāpere.</li> </ul>
24 (#3.2.382)	Tai Tokerau Land Claim (Wai 354)	Annette Sykes and Kalei Delamere-Ririnui	<p>Counsel submit that the originating Wai 354 statement of claim alleges that the claimants exercised mana over their sacred waterways prior to the signing of the Treaty of Waitangi and envisaged that the exercise of mana would continue in the advent of the Treaty of Waitangi.</p> <p>With respect to areas of hot water and geothermal interests and rights, the claimants make specific claims to Waiwera Hot Pools which are located as part of their traditional lands that were wrongfully affected as a result of the Mahurangi Crown Purchase arrangements. Counsel submit those arrangements ignored the claimants’ traditional relationships to Waiwera and the specific Tuku Whenua that</p>

			<p>had been effected by Hemara Tautuhi to Pomare II in accordance with Tikanga Māori.</p> <p>Counsel submit that these claims remain to be reported on by the Te Paparahi o Te Raki Inquiry but are matters that should be properly considered as part of Stage Three of the Freshwater and Geothermal Resources Inquiry.</p>
25 (#3.2.513)	Ngāi Tahu Settlement (Waitaha ki te Waipounamu) Claim (Wai 2460)	Darrell Naden	<p>Counsel submit that the Wai 2460 claimants have rights and interests in geothermal resources located in their rohe in Te Waipounamu.</p> <p>Counsel submit there are almost 80 springs in Te Waipounamu, about 50 of which are warm to hot water.</p>
26 (#3.2.517)	Ngāti Hine Lands, Forests and Resources Claim (Wai 682)	Dr Season-Mary Downs, Chelsea Terei and Majka Cherrington	<p>Counsel submit that Ngāti Hine have freshwater and geothermal resources in their rohe and Ngāti Hine rangatira signed te Tiriti o Waitangi which recognises rights of Māori in respect of water and geothermal resources.</p> <p>Counsel submit that Wai 682 covers matters affecting Ngāti Hine lands, people and resources, including water and geothermal resources and Ngāti Hine leadership and environmental teams are involved in both local and national water issues and dialogue and can make an important contribution to this inquiry.</p>
27 (#3.2.540)	Ngāti Tuwharetoa (Bay of Plenty) Settlement Trust	Graham Harford	<p>Ngāti Tuwharetoa (Bay of Plenty) Settlement Trust (Ngāti Tuwharetoa ki Kawerau) is a post settlement governance entity representing the kāinga and collective interests of Ngāti Tuwharetoa (Bay of Plenty).</p> <p>Counsel submits that a key taonga for Ngāti Tuwharetoa ki Kawerau is the Kawerau Geothermal Reservoir, located within its rohe. In the Ngāti Tuwharetoa (Bay of Plenty) Claims Settlement Act 2005, the Crown made a statutory acknowledgement of the role of Ngāti Tuwharetoa ki Kawerau as kaitiaki of the geothermal resource within its rohe.</p> <p>Counsel further submits that, through its subsidiary company Ngāti Tuwharetoa Geothermal Assets Ltd, Ngāti Tuwharetoa ki Kawerau purchased the Crown's geothermal assets in Kawerau and has extensive experience and expertise in the extraction, use and reinjection of geothermal fluid.</p>

<p>28 (#3.2.576)</p>	<p>The trustees of the Tūhourangi Tribal Authority</p>	<p>Renika Siciliano</p>	<p>The Tūhourangi Tribal Authority (the Tribal Authority) is a post settlement governance entity established to represent the 14 hapū of Tūhourangi iwi and receive assets from the historical Treaty of Waitangi Settlement for Te Pūmautanga o Te Arawa (Wai 2358, #3.2.576 at [2]).</p> <p>The Waimangu Volcanic Valley, a geothermal taonga for Tūhourangi, is owned in part by the Tribal Authority. Tūhourangi also have seven geothermal fields within their rohe. Counsel accordingly submits that the Tribal Authority is heavily involved in geothermal investments and development and seek inclusion to ensure their rights and interests are not adversely affected in the Tribunal’s inquiry into stage three issues (Wai 2358, #3.2.576 at [2] and [5]).</p>
<p>29 (#3.2.593)</p>	<p>The Climate Change (Fenwick) claim (Wai 3344)</p>	<p>Ārama Ngāpō and Katie Paul</p>	<p>Mr Fenwick is Chairman of the Ruahine Kuharua Incorporation (the Incorporation), a Māori forestry block which sits over the geothermal resources of the Taheke-Tikitere field on Lake Rotoiti.</p> <p>Counsel submit that the Taheke-Tikitere geothermal reservoir is a key taonga for the beneficial owners of the Incorporation’s lands, including Mr Fenwick and his whānau, hapū and iwi, and the owners also have mana whenua interests in the geothermal reservoir. Counsel further submit the point that the Incorporation has recently signed a development agreement with Mercury Energy on the exploration of the field.</p>
<p>30 (#3.2.594)</p>	<p>The Climate Change (Ross) claim (Wai 3284)</p>	<p>Ārama Ngāpō and Katie Paul</p>	<p>Mr Ross is of Ngāti Tūwharetoa descent, is a beneficiary of two Tūwharetoa marae as well as a number of large forestry and farm trusts. He currently serves as a trustee for East Taupō Lands Trust and Owhaoko B&amp;D Lands Trust</p> <p>Mr Ross is an uri of two marae which sit above the Tauhara and Tokaanu geothermal fields, and which fall within the purview of this inquiry. Counsel for Mr Ross submit the geothermal resources are connected to the sustainability and wellbeing of the surrounding resources of the marae, and the geothermal fields are taonga for Mr Ross’ hapū with their traditional relationship including mana whenua, ancestral kōrero, bathing, healing, manaakitanga and raranga.</p>

31 (#3.2.595)	The Climate Change (Whata) claim (Wai 3280)	Ārama Ngāpō and Katie Paul	<p>Mr Whata is the Chairman of the Tautara Matawhaura Māori Lands, which sits over the geothermal resources of the Rotoma field in the Rotorua Lakes district.</p> <p>Counsel submit the Rotoma geothermal reservoir is a key taonga of the beneficial owners of the Tautara Matawhaura Māori Lands Trust, including the whānau, hapū and iwi of Mr Whata. Since 2007, Mr Whata has been involved with neighbouring trusts and Mercury Energy regarding the exploration and development of the Rotoma geothermal field.</p>
32 (#3.2.582)	Trustees of Ngāti Tahu – Ngāti Whaoa Rūnanga Trust	Paul Majurey	<p>Ngāti Tahu – Ngāti Whaoa Rūnanga Trust is a post-settlement governance entity established in 1991 to receive assets from the historical settlement for Te Pūmautanga o Te Arawa.</p> <p>Counsel submit that Ngāti Tahu – Ngāti Whaoa has a historical, cultural and contemporary association with geothermal resources within their traditional rohe. Such resources were used for cooking, drinking, bathing and healing. With the passing of the Geothermal Energy Act 1953, Ngāti Tahu – Ngāti Whaoa lost control of and access to some of their geothermal taonga. There are ten geothermal resources which fall within the traditional rohe of Ngāti Tahu – Ngāti Whaoa</p>
33 (#3.2.583)	Mataarae Marae	Paul Majurey	<p>Mataarae Marae is located within the Ngāti Tahu Ngāti Whaoa rohe on part of Paeroa East 5 block, which has been set aside as a Māori reservation.</p> <p>Counsel submit that Mataarae Marae has access to geothermal resources near the Paeroa East 5 block which they use for hot bathing, cooking, natural preserving and sites for ritual purposes and healing.</p>
34 (#3.2.584)	Ngāti Tahu Tribal Lands Trust	Paul Majurey	<p>Ngāti Tahu Tribal Lands Trust holds several land blocks which fall within the Ngāti Tahu Ngāti Whaoa rohe.</p> <p>The Ohaaki geothermal system is located within the land blocks which fall under the Trust, and the Trust is affected by the Ohaaki Geothermal Power Station.</p>

35 (#3.2.585)	Ōhāki Marae	Paul Majurey	<p>Ōhāki Marae is located within the Ngāti Tahu Ngāti Whaoa rohe on 4.2134 hectares of Tahorakuri A No 1 Sec 1.</p> <p>The Ohaaki geothermal system is located within the rohe of the Marae, and the Marae is affected by the operation of the Ohaaki Geothermal Power Station, that is referred to in this inquiry.</p>
36 (#3.2.586)	Paeroa South B2B1 Ahu Whenua Trust	Paul Majurey	<p>Paeroa South B2B1 Ahu Whenua Trust is located within the Ngāti Tahu Ngāti Whaoa rohe.</p> <p>There are geothermal resources located below the Trust's land.</p>
37 (#3.2.587)	Tahorakuri A1 Sec 33B Ahu Whenua Trust	Paul Majurey	<p>Tahorakuri A1 Sec 33B Ahu Whenua Trust is located within the Ngāti Tahu Ngāti Whaoa rohe.</p> <p>The Trust has access to geothermal resources near their land, referred to in this inquiry, which the beneficial owners of the land use for hot bathing, natural cooking, natural preserving and are sites for ritual purposes and healing</p>
38 (#3.2.588)	Te Toke Marae	Paul Majurey	<p>Te Toke Marae is located within the Ngāti Tahu Ngāti Whaoa rohe.</p> <p>The Marae have geothermal taonga within their land, and rohe.</p>
39 (#3.2.589)	Tutukau East Z Trust	Paul Majurey	<p>Tutukau East Z Trust is located within the Ngāti Tahu Ngāti Whaoa rohe.</p> <p>The Trust has geothermal resources located below the Trust's land.</p>
40 (#3.2.590)	Waimahana Marae	Paul Majurey	<p>Waimahana Marae is located within the Ngāti Tahu Ngāti Whaoa rohe.</p> <p>The Marae has geothermal resources located below the Marae's land.</p>
41 (#3.2.592)	Raukawa Settlement Trust	Frazer Barton and Awhina Clark-Tahana	<p>Raukawa Settlement Trust was established in 2009 as a post-settlement governance entity.</p>

			Within the takiwā of the Raukawa Settlement Trust are a number of significant freshwater resources and seven geothermal fields. Raukawa have significant rights and interests in these geothermal fields as well as the surrounding natural resources within their takiwā.
42 (#3.2.654)	The Tangonge (Kaitaia Lintel) claim (Wai 1699)	Janet Mason	Haami Piripi, claimant to Wai 1699, was the Chairperson of Te Rūnanga o Te Rarawa and the Chief Executive of the Māori Language Commission. The Ngāwhā geothermal springs is a taonga in Te Rarawa's rohe. Mr Piripi, and those he represents, have a traditional, cultural, spiritual, environmental and economic relationship to Ngāwhā. This includes concerns regarding the geothermal power generation projects currently in place or planned.
43 (#3.2.654)	The Te Rarawa (Piripi) claim (Wai 1701)	Janet Mason	Haami Piripi, claimant to Wai 1701, was the Chairperson of Te Rūnanga o Te Rarawa and the Chief Executive of the Māori Language Commission. The Ngāwhā geothermal springs is a taonga in Te Rarawa's rohe. Mr Piripi, and those he represents, have a traditional, cultural, spiritual, environmental and economic relationship to Ngāwhā. This includes concerns regarding the geothermal power generation projects currently in place or planned.
44 (#3.2.627)	The Geothermal Resources (Te Tua & Karaitiana) claim (Wai 3415)	David Stone, Charl Hirschfeld, Barney Tūpara and Harry Clatworthy	The Wai 3415 claimants are uri of their tūpuna Kurapoto and Tia who, and their uri of their time, exercised kaitiakitanga in respect of the geothermal resources within their area or rohe where there has been rapid growth in the utilization of geothermal energy.
45 (#3.2.650)	The Taumanu Land claim (Wai 1194)	Annette Sykes, Jacki Cole and Maia Te Hira	Wai 1194 is brought on behalf of the descendants of the tupuna Te Rangiuuora I & II under the mantle of Ngāti Te Rangiuuora and other hapū of Ngāti Pikiāo. The Wai 1194 claimants have specific interests in geothermal issues as Ngāti Te Rangiuuora and Ngāti Pikiāo lands are situated over several geothermal fields known as Group 3 and Group 4 in the Bay of Plenty Regional Council Regional Plan.



<p>46 (#3.2.651)</p>	<p>The Ngā Uri o Ngā Tokotoru o Manawakotokoto Lands and Resources claim (Wai 1212)</p>	<p>Annette Sykes, Jacki Cole and Maia Te Hira</p>	<p>Wai 1212 is brought on behalf of the descendants of the tupuna Te Rangiuuora I &amp; II under the mantle of Ngāti Te Rangiuuora and other hapū of Ngāti Pikiāo.</p> <p>The Wai 1212 claimants have specific interests in geothermal issues as Ngāti Te Rangiuuora and Ngāti Pikiāo lands are situated over several geothermal fields known as Group 3 and Group 4 in the Bay of Plenty Regional Council Regional Plan.</p>
<p>47 (#3.2.656)</p>	<p>The Whakarewarewa Geothermal Valley and State Forest claim (Wai 533)</p>	<p>John Kahukiwa</p>	<p>Hokimatemai Kahukiwa, a named claimant of Wai 533, brings matters on behalf of Ngāti Hurungaterangi, Ngāti Taeotu me Ngāti Te Kahu o Ngāti Whakaue.</p> <p>These three hapū of Ngāti Whakaue have interests in relation to their waiariki and ngāwhā that are of an historically extensive, unique, enduring and significant nature. Within the rohe of Ngāti Hurungaterangi, Ngāti Taeotu and Ngāti Te Kahu are significant geothermal resources that are ancestral and are taonga with material, cultural, spiritual, and medicinal benefits and purposes.</p>