SUBMISSION TO ACTION FOR HEALTHY WATERWAYS PACKAGE OF PROPOSALS

Ministry for the Environment
PO Box 10362
Wellington 6143

Via email: consultation.freshwater@mfe.govt.nz

Submitters:
Te Maru o Ngāti Rangiwewehi Iwi Authority on behalf of Ngāti Rangiwewehi Iwi and hapū,
Tarimano Marae Trust,
Rangiwewehi Charitable Trust
Te Tāhuhu o Tawakeheimoa Trust
Tarimano Kōhanga Reo
Mangorewa Kaharoa Te Taumata Trust

Via: taiao@rangiwewehi.com and office@rangiwewehi.com

Te Maru o Ngāti Rangiwewehi Chair
Name: Personal details removed
Signed: Personal details removed

Authorised by Personal details
HAKA MO TŌ MĀTOU WAI

He ihupuku e
Ae ho!
He ihupuku e
Ae ho!
He ihupuku koa
Putohe ana te hiahia
He unuhanga hou mo te taua nei
He ihupu e
Ho!

Kororroii....
Kororo....ahaha!
Te tangi mai a te mihini pakeha
Ue ngo, ngo, ue ha!
Whakamanioro mukaka
Pukaiwhiwhia
Ue ngo, ngo
Ue ha!

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1 Murray Bidois – Kaitito
Ngāti Rangiwewehi, with our many hapū, and descendants, whakapapa to our wai. We have a spiritual, cultural and physical relationship with our waterways, including but not limited to, Te Wai Mimi ō Pekehaua, Awahou and Kaikaitāhuna, Hamurana, as well as Te Rotorua Nui a Kahuamamomoe, all which is on the doorstep of our Marae Tarimano, Rotorua, Aotearoa. We maintain undisturbed settlement in our rohe since the arrival of our ancestors. Our ancestral connections have us connect and have a relationship with Wai, from Uta (inland) ki Tai (coastal); Rangiwewehi ki Uta, ki Tai, ki Maketū.

Following a second Environment Court decision over 10 years ago, Ngāti Rangiwewehi have been developing, reviewing and implementing our water strategy. Our approach to wai Māori draws upon our strengths in mātauranga Māori, and combines it with western science to ensure we are truly fulfilling our obligations as kaitiaki of our wai. Over the last ten years we have undertaken the following projects to ensure we do just this:

- **Watercress monitoring**: A contemporary mātauranga Māori tool (i.e the loss of a once abundant supply that fed the multitudes), and

- **Ka Tū Te Taniwha Ka Ora Te Tangata**: A project which helped the iwi understand the impacts of development in the Awahou groundwater catchment to ensure the health and wellbeing of our people; and more recently,

  - **Kaitiaki Flows**: The creation of a culturally based water flow and water quantity system that recognises the intrinsic value of Ngāti Rangiwehi awa and puna.
Kaitiaki Flows

The term ‘Kaitiaki Flow’ describes the water flow required in order to retain and protect its health and wellbeing first – as described in the proposed Mana o Te Wai NPSFM, while also providing capacity for social and economic allocation and use by and for Ngāti Rangiwehi. The Kaitiaki Flow alternative ‘instream flow model’ has formed a basis for the approved joint Resource Consent between Te Puna o Pekehua Puna Reserve Trust and Rotorua Lakes Council for the taking of water from the Taniwha Spring for municipal water supply (Ngongotahā Municipal Water Supply) and is the first Mātauranga Māori based tool created for the protection of our wai. The iwi would like to see the Kaitiaki Flows model utilised as a tool for protecting the health and waterways across the country – to activate kaitiakitanga and mātauranga in action, ensuring the Kaitiaki Flow in waterways are protected above all else.

Te Tūāpapa o te Wai

Te Tūāpapa o ngā wai o te Arawa is the values framework that encapsulates Te Mana o te Wai across ngā waiariki o Te Arawa. To give effect to Te Tūāpapa o ngā Wai o te Arawa, and Te Mana o te Wai, Ngāti Rangiwehi make the submission points below and the specific submission points in the attached table. Ngāti Rangiwehi also endorses the report and recommendations of Kāhui Wai Māori. While we are descendants of Te Arawa waka and part of the Te Arawa confederation, we have always maintained the rights and interests of Ngāti Rangiwehi over our wai – Lakes, streams, puna and geothermal waters and that we are the only ones who will speak for our own water rights and waterways of our core rohe.

We were also disappointed to see that as partners of Te Tiriti, tangata whenua submitters (via the online tool) are forced to choose between: Individual; NGO; Business / Industry; Local Government; Central Government; Unspecified/Other…. This is quite shocking that there is no consideration for tangata whenua, iwi/ hapū / whānau on this kaupapa that is so significant beyond the input of the Crown, Local Government, Industry or Individual.

Whakarongo mai nei:
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<td>Involvement of tāngata whenua</td>
<td>- Ngāti Rangiwewehi are concerned as to the practicality of engagement “at every stage of the process…” given the short timeframe proposed.</td>
<td>- Seek guidance from government on an acceptable level of engagement with tangata whenua to meet timeframes.</td>
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<td>- Given the timeframes to have a notified plan ready by 2023 Council must consider its approach to engagement</td>
<td>- EAP2 Engagement Spectrum may be referred to for specified level of engagement</td>
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<td>- Clarification around any restricted avenues for appeal, noting plans are operative by 2025</td>
<td>- Ngāti Rangiwewehi, while capable, require resourcing and recognition of skills and expertise. Our mātauranga and intellectual property, whilst we may be willing to share, remains our own.</td>
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<td>- Supporting and enabling tangata whenua to design attributes and how they are to be assessed amidst developing a regional common vision for inclusion in the RPS will require intensive engagement.</td>
<td>- Explore the funding and resourcing of environmental hubs for iwi collectives to respond to NPSFM and RMA reforms.</td>
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<td>- “Involvement” this has too many interpretations</td>
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<td>- Likewise with “engagement” being too ambiguous</td>
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<td>- The differing levels of capability and capacity of tangata whenua also hugely impact their ability to actively engage in these matters.</td>
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<td>- Ngāti Rangiwewehi however, are confident, and competent to be able to participate in this space i.e. develop our Iwi Māori Values and localised attributes, as mentioned, we know our waterways intimately and can assess its flows, attributes, limits, monitoring methodologies, with mātauranga Māori underpinning all processes enhancing and embodying Mana o Te Wai. Ngāti Rangiwewehi potentially can assist other hapū, iwi, and rohe using our recently acclaimed ‘Kaitiaki Flows’.</td>
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<td>- Considerations of s30 around delegations and compliance for tangata whenua need to be considered for future.</td>
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| **Fundamental concept – Te Mana o Te Wai** | Ngāti Rangiwewehi supports the following provisions proposed in the discussion document:  
- Health and well-being of the water is the first priority.  
- That a reference and reverence be given to Te Tiriti O Waitangi  
- Adopting localised prioritisation of water allocation; ensuring the Mana and well-being of the water, remains to its self-first and foremost at all seasons and extremities  
- Providing for the involvement of iwi and hapū in freshwater management and identifying and reflecting tangata whenua values and interests (as a partner relationship)  
- Enabling and prioritising Mātauranga Māori to be applied  
- Support for an integrated approach with emphasis on the effects of use and development of the land on a whole of catchment approach including effects on sensitive environments | - That Te Mana o te Wai is strengthened and raises water quality standards in both urban and rural areas including new national bottom lines for water quality measures, better monitoring of ecosystem health, and a requirement to act where degradation is occurring, underpinned by tangata whenua values and mātauranga Māori.  
- Include recognition of the principles of the Tiriti o Waitangi in the management of freshwater resources  
- Te Mana o Te Wai should be presented in the NESF or at a minimum made reference to in that document.  
- Request that guidelines regarding implementation of a compulsory Māori values and any associated |
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| Further amendments recommended: | - National target for water quality improvement is achieved by way of Te Mana o Te Wai and tāngata whenua values/ mātauranga Māori, underpinning the process.  
- Freshwater must be allocated and used efficiently: all existing over allocation is phased out, recalled and the archaic first in first serve approach – which has never benefited tangata whenua should be reviewed.  
- Resolve access to water concerns from Māori: Ngāti Rangiwehi have done this via our Iwi-GNS 4 year project – Ka Tu te Taniwha and Kaitiaki Flows research on water quantity and flow regime for our puna that is currently drawn on for municipal use.  
- Ngāti Rangiwehi call for an end to further degradation and loss of inland wetlands as well as coastal wetlands that receive ‘freshwater’.  
- Any ecosystem loss and areas where degradation requires restorative approach  
- Habitats of indigenous freshwater species should not merely be safeguarded but should be protected.  
- Adapt swiftly with technology as well as mātauranga Māori methods of regularly reporting information on state of water bodies  
- Accumulative effects to be considered to value the whole water catchment ecosystem alongside mātauranga Māori. | attributes and the extent to which mātauranga Māori is recognised in planning and regulatory processes  
- Significant values of outstanding water bodies are protected with the consideration of cultural and mātauranga Māori applied  
- Greater clarity sought on setting attributes for Mahinga Kai/ Tāngata whenua values. Request that guidelines are provided for the implementation of the NPS-FM that will include a section on the implementation of a compulsory Māori values and any associated attributes enabling Mātauranga Māori and an appropriate process to do this.  
- Create a new freshwater National Environmental Standard (NES) that is based on tāngata whenua values. |
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| Approaches to enhancing the implementation of objectives and policies: | - Councils are to at a minimum, engage with local communities to determine local understandings of Te Mana o Te Wai.  
- The application of mātauranga Māori lens and Te Ao Māori view and will most likely challenge the council’s western view of Te Mana o Te Wai and how it should be implemented – this needs to be addressed now.  
- Councils need to have culturally competent staff to form meaningful relationships with tangata whenua, recognise mātauranga Māori as valuable and respond to mātauranga appropriately, i.e. normalising the way council do things. This requires a culturally skilled staff force.  
- Likewise, the Ministry and Council will need to ensure tangata whenua are also resourced, trained and prepared for implementation of an NPSFM.  
- The re-ignition of kaitiaki status (while never extinguished by tangata whenua) has been diminished and minimised over time and appropriate process will need to be considered in the timeframe, resourcing and participation of tangata whenua.  
- Recognising a tangata whenua /community vision to understand the current state of water bodies and / or future state will require significant skill and expertise to ensure a consensus without taking away from the focus of the required attributes and actions necessary to reach any given goal and vision.  
- Ultimately the long term vision should set the foundation and context for future freshwater management planning decisions.  
- Regularly testing and assessing the state of water bodies and whether they are providing for the long term vision is critical and should incorporate mātauranga Māori | - Require guidelines giving direction to Council on localised interpretation of Te Mana o Te Wai as well as guidelines implementation of a compulsory Māori values and any associated attributes.  
- Higher quality swimming standards.  
- Query as to whether the localised Vision Statement is subject to a full schedule 1 process.  
- We support Te Kahui Wai Māori and the nominated appointment of tangata whenua nominated representatives and commissioners with cultural capacity as voices and contributors to the development of the NPSFM.  
- Removal of the grand-parenting of water allocation and phase out.
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<td>Fresh Water-Farm Plans (FW-FP)</td>
<td>- Discharges to water requires a fair allocation system to provide for new entrants and the development of underdeveloped land, which is disproportionately owned by Māori&lt;br&gt;- Fresh Water-Farm Plans requiring new plans, or updating plans to build fencing or riparian may where appropriate be mitigated by employing mātauranga Māori methodology.&lt;br&gt;- Accumulative effects to be considered alongside mātauranga Māori.</td>
<td>- Quality and qualified Fresh Water-Farm Plans (FW-FP) should incorporate assessment of mātauranga Māori, to ensure tāngata whenua values are integrated from land to water. This would require mātauranga Māori practitioners and auditing processes.</td>
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