Te Wai Māori

TE WAI MĀORI TRUST SUBMISSION TO THE ENVIRONMENT SELECT COMMITTEE'S FAST TRACK APPROVALS BILL

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TO ENVIRONMENT SELECT COMMITTEE

19 APRIL 2024

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INTRODUCTION

1. This document provides Te Wai Māori Trust's (Te Wai Māori) response to the Fast Track Approvals Bill (**FTA Bill**).

2. Te Wai Māori works on behalf of 58 mandated Iwi organisations (MIOs), who represent all iwi throughout Aotearoa. Notwithstanding that, this document is not intended to usurp or detract from any responses made independently by iwi or hapū or any other pathways iwi and hapū may pursue to affirm their rights.

3. In preparing this submission we have drawn heavily on the response prepared by the Freshwater Iwi Advisors Group. We also acknowledge the Environmental Defence Society's template submission, which we have also referenced in part.

4. The submission covers:

   (a) the background to Te Wai Māori;

   (b) our position [**strongly opposed**];

   (c) a statement of key matters of concern; and

   (d) a statement of key features of responsible fast-track legislation.

5. In providing this feedback we are not expressing support for the FTA Bill or the policy intent behind it.

6. We wish to make an oral submission in support of this written submission.

TE WAI MĀORI TRUST

7. Te Wai Māori Trust is an independent Māori Trust established under the Māori Fisheries Act 2004 to advance Māori interests in freshwater fisheries. The Trust is a product of the Deed of Settlement under the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 and is an entity of Te Ohu Kaimoana.

8. The purpose of Te Wai Māori Trust is to hold and manage the trust funds on trust for the beneficiaries under the Deed of Settlement, in order to advance Māori interests in freshwater

fisheries[1].

9. Protecting Māori interests in freshwater fisheries ultimately means protecting habitat to ensure quality water and abundant species and empowering our people to uphold their responsibilities regarding freshwater fisheries.

10. Our core values are te mana o te wai, whakapapa, and kaitiakitanga and to represent the natural order of the Te Wai Māori worldview. First and foremost, we value freshwater and all that is encompassed in its ecosystems. The inherent right for water in its own state. Each water body has its own mauri. Whakapapa recognises our interdependence which binds us as tangata of the environment; and kaitiakitanga, our obligation and responsibility to care for Papatūānuku and ngā atua.

11. Māori do not distinguish land from lakes, lagoons, rivers, wetlands, freshwater species and their associated beds. They are considered part of an undivided entity. Ensuring the health and well-being of freshwater is essential for the continued health and well-being of freshwater fisheries. Healthy waterbodies are a direct source of mahinga kai for Māori and the use of mahinga kai is an important expression of cultural identity and values, passed down through generations.

OUR POSITION

12. Te Wai Māori is **strongly opposed** to the FTA Bill in its current form. The Bill is unconstitutional, is heavily and disproportionately weighted to development, concentrates power in the hands of three Ministers and has significant and far-reaching adverse implications for:

    (a) te taiao (the environment), including through severely undermining existing environmental protections for freshwater;

    (b) our ability to protect and enhance freshwater fisheries habitat, and establish freshwater fisheries;

    (c) our ability to directly and indirectly benefit Māori freshwater fishing interests as guaranteed by Te Tiriti o Waitangi;

[1] The Māori Fisheries Act defines "freshwater fisheries" as including the species, habitat, surrounding land, water column, and water quality and quantity. Sports fisheries or unwanted aquatic life or activities conducted under the Freshwater Fish Farming Regulations 1983 are excluded from this definition.

(d) the customary rights, interests and responsibilities of iwi and hapū, including Tiriti o Waitangi settlement interests; and

(e) the ability of iwi and hapū to exercise mana motuhake and kaitiakitanga as guaranteed by Te Tiriti o Waitangi.

13. Freshwater in this country is already severely degraded and many of our taonga indigenous freshwater fish species are threatened with extinction. There are major risks pending from climate change and the cumulative and legacy effects from intensified land development and resource use. Māori interests in freshwater and freshwater fisheries have been directly adversely impacted as a result.

14. The purpose of the FTA Bill is "to provide a fast-track decision-making process that facilitates the delivery of infrastructure and development projects with significant regional or national benefits." The FTA Bill is heavily weighted to development and the Bill's purpose is dominant over the purpose and principles of existing statutory legislation (like the RMA). The Bill also alters and removes provisions under existing legislation. In doing so, it elevates development over protection of the environment, and iwi and hapū rights and interests, including their rights and obligations as kaitiaki.

15. As a case in point, even though RMA national direction is listed in the hierarchy, Ministers have already indicated that there is no requirement to comply with that direction. National Policy Statements for Freshwater, the Coastal Environment and Biodiversity have involved extensive evidence, stakeholder engagement and compromise prior to their enactment. This Bill provides an easy pathway for all of this work to be undone or ignored.

16. There is a strong case to make consenting swifter, less bureaucratic, more accessible, and more cost effective. That should be the focus of changes to the consenting regime, but that is not what this Bill does. The Bill creates a pathway to approve projects that unacceptably degrade our environment and undermine the rights and interests of iwi and hapū. The FTA Bill poses significant risks to the environment and economy, to iwi and hapū and communities and should not move forward without substantial amendments. It places excessive powers to approve projects in the hands of three Ministers and goes well beyond what is needed to address acknowledged issues within the existing consenting regime.

17. We also disagree that existing legislation and policy provisions that protect the health and wellbeing of the environment and the rights, interests, and participation of iwi and hapū

cause unnecessary delays. To the contrary, early, fully informed and active involvement by iwi and hapū has been shown to be a key element in successfully developing and delivering infrastructure projects.

18. Te Wai Māori also has fundamental concerns about the way in which the FTA Bill has been developed at breakneck speed, devoid of appropriate consultation and engagement with iwi and hapū, and with inadequate opportunity for public scrutiny.

STATEMENT OF KEY MATTERS OF CONCERN

Impacts on the environment

19. Te Wai Māori was established to advance Māori interests in freshwater fisheries. This includes protecting and restoring the health and wellbeing of instream habitat so that it supports abundant fish life.

20. There are significant existing pressures on freshwater and freshwater fisheries. We are seeing an accelerated loss of indigenous fish species and some populations are verging on total collapse. Low flow caused by irrigation and over-abstraction is one of the biggest problems and intensive farming has caused a rapid decline in water quality and elevated toxicity levels.

21. The continued degradation of the taiao has a direct impact on the social, cultural and economic wellbeing of iwi and hapū. It has impacted the ability of iwi and hapū to practice mahinga kai and to maintain and restore relationships with te taiao. For generations this has been done through the exercise of kaitiakitanga, the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations. The reciprocal relationship that iwi and hapū have with the natural environment has meant that they are best placed to monitor and respond to environmental threats.

22. The FTA Bill fails to recognise this relationship and the Bill directly impacts the ability of Te Wai Māori to support iwi and hapū to give effect to their aspirations for freshwater fisheries. The Bill does away with essential safeguards intended to limit the impacts of development.

Amendment sought

23. There should be proper weighting for environmental criteria, including Part 2 of the RMA and national direction.

Pro-development at all costs

24. The FTA Bill applies a pro-development purpose in the assessment of the effects of proposed activities. The purpose statement of the FTA Bill is weighted above the purpose and provisions of other statutes within scope. There are effectively no checks and balances in place.

25. Te Wai Māori fundamentally opposes this approach, which will result in the purposes, principles and provisions required under existing legislation being significantly diluted or entirely removed when assessing applications.

26. It is not appropriate that the pro-development purpose of the FTA Bill should take priority, and not be qualified by any consideration of the natural environment. The RMA seeks to reflect New Zealand's international commitments, domestic environmental issues and cultural context. Under the FTA Bill the purpose and principles of the RMA, national direction, council plans and other RMA provisions are second order considerations.

27. The existing provisions in the RMA (sections 6(e), 7(a) and 8), the Conservation Act (section 4) and Te Mana o te Wai in the National Policy Statement for Freshwater Management carefully consider and weight environmental, social and cultural effects of resource use. The FTA Bill will sweep away these hugely important environmental protections which were built by multiple players over many decades. These safeguards are critically important in protecting and restoring our freshwater and freshwater fisheries and are relied upon by iwi and hapū to preserve their rights, interests and aspirations.

28. The FTA Bill is seriously flawed and will circumvent every meaningful piece of legislation and policy we have in this country to protect the taiao.

Amendment sought

29. Te Wai Māori seeks an amendment that retains the application of existing legislative purposes, principles and provisions under the FTA Bill, while streamlining or making more efficient, existing approval processes.

Undermining the separation of power and the rule of law

30. Generally, to access the fast-track approvals process, applicants will need to apply to the Joint Ministers. For most approvals, the reference to 'Joint Ministers' is to the Minister for Infrastructure, the Minister for Transport, and the Minister for Regional Development. The

Bill effectively enables the Joint Ministers to pick and choose projects for fast-tracking.

31. By placing the Joint Ministers at the front end (the referral stage) and the back end (decision-making stage) the FTA Bill will:

    (a) reshape state power;

    (b) change the relationship between citizens and the state (who largely cannot participate)

    (c) modify fundamental structures and functions of the state (altering the scope of parliamentary sovereignty and failing to observe the separation of power); and

    (d) remove the safeguards and limitations imposed on the exercise of state functions (for example, the rule of law, Te Tiriti o Waitangi and natural justice).[2]

32. We are concerned that the FTA Bill will enable the Joint Ministers to operate outside the rule of law which requires the following:

    (a) Everyone is subject to the law, including the Government.

    (b) The law should be clear, and clearly enforceable. This is not the case. Schedule 2A activities are unknown.

    (c) There should be an independent, impartial Judiciary.

33. Certain decisions must be made by judges who are independent of the Government. Judges interpret legislation and common law. They decide disputes between individuals and between individuals and the Government.

34. The FTA Bill will leave the Joint Ministers (with the ability to refer, approve and decline projects) open to considerable legal and political risk, including allegations of pre-determination and bias. In addition, there is no clarity around how conflicts of interest will be defined or managed.

35. Te Wai Māori strongly opposes this executive overreach which gives unrestrained power to three Ministers to approve projects.

[2] See Fundamental constitutional principles and the rule of law at: https://www.ldac.org.nz/guidelines/legislation-guidelines-2021-edition/constitutional-issues-and-recognising-rights-2/chapter-4/part-1/?stage=Live

Amendment sought

36. Timely, robust and independent assessments of proposals is an essential feature of good practice large-scale application assessment. Te Wai Māori recommends that this is incorporated into the FTA Bill.

Exclusion of public participation

37. The FTA Bill takes away the sacrosanct and fundamental right of public participation. While Joint Ministers can invite comment from any person, it is entirely at their discretion.

38. The Bill removes almost all opportunities for communities, the public and affected parties to be involved in the decision-making process. Public and limited notification of a consent application is not provided for.

39. Te Wai Māori opposes public exclusion under the FTA Bill. The proposed legislation prevents local communities (including newly established community catchment groups), environmental non-governmental organisations, and other affected groups from participating in the decision-making processes under the FTA Bill.

40. The exclusion of public participation from consenting processes for projects likely to have significant adverse environmental effects, is undemocratic and detrimental, for communities and the environment.

Amendment sought

41. Te Wai Māori seeks full public notification of all projects considered under this legislation if it is enacted.

42. In addition, the absence of public scrutiny through the Select Committee process of projects yet to be listed in Schedule 2 warrants full public notification, including opportunities for submissions and a hearing by an independent expert panel.

Impacts on the Judiciary

43. The three branches of power, the Legislature, the Executive and the Judiciary must operate independently to prevent abuses of power, as each branch acts as a check on the others. Judges must be free to determine each case according to law, based on evidence presented in court.

44. When referring projects under the FTA Bill, Ministers must seek comment from only a small range of people. This does not include the Minister for the Environment. The specialist Environment Court has no role whatsoever.

45. Similarly, the High Court cannot hear appeals under the FTA Bill, even on points of law, unless someone with 'standing' takes action (though judicial review is available).

46. The Bill also sweeps away reasoned judicial decision-making, like the Supreme Court's ruling in King Salmon, that decision-makers can't refer back to the purpose of an Act in order to undermine clear directions in national policy statements.

Amendment sought

47. Te Wai Māori seeks that the Judiciary has the full remit available to review decisions made under the FTA Bill.

The FTA Bill is Unconstitutional

Te Tiriti o Waitangi

48. Te Tiriti o Waitangi is New Zealand's founding constitutional document. The Crown has an obligation to make decisions in a way that is consistent with it.

49. Te Wai Māori was established as a result of the Deed of Settlement under the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992. The Deed of Settlement recognised the Te Tiriti partnership between the Crown and Māori.

50. There is no requirement for decision makers to "take into account" or to "give effect to" the principles of the Treaty of Waitangi in the FTA Bill, or to protect and uphold iwi and hapū rights and interests guaranteed in Te Tiriti o Waitangi.

51. The Bill includes an obligation on all persons exercising functions, powers, and duties to act in a manner that is consistent with:

    (a) the obligations arising under existing Treaty settlements; and

    (b) customary rights recognised under the Marine and Coastal Area (Takutai Moana) Act 2011 and the Ngā Hapū o Ngāti Porou Act.

52. This obligation is a baseline expectation and is not protective of iwi and hapū beyond existing

settlements and does not provide for iwi and hapū that are yet to settle.

Amendment sought

53. Te Wai Māori seeks the inclusion of a Tiriti principles clause that requires all persons exercising functions and powers under the FTA Bill to 'give effect to' Te Tiriti o Waitangi and its principles.

Listed project process

54. The FTA Bill proposes to have "listed projects" added to Schedule 2 of the Bill. The Bill does not currently contain any projects. There are two categories proposed, 2A and 2B.

    (a) Projects listed in Schedule 2A of the Bill will automatically be referred to an Expert Panel, bypassing the need to apply to Joint Ministers to make a referral decision.

    (b) Projects listed in Schedule 2B of the Bill are "considered to have significant regional or national benefits."

55. Schedule 2A listed projects go straight to panel consideration without the need for referral. Expert Panel members are not required to have the skills and experience relevant to environmental matters. The panel is an advisory group only. The legal decision-making rests with Joint Ministers and not the Expert Panel.

56. There is also a requirement that panel convenors consult with Joint Ministers when appointing panel members, removing any premise that the two remain independent.

57. Schedule 2B will list individual projects for the Joint Ministers to consider for referral. To be eligible from referrals, projects must have "significant regional and national benefits", but this is not defined.

58. The criteria for referral are discretionary and broad and there are no meaningful constraints on what projects can be referred to fast-tracking. Once referred or listed, it will be extremely surprising if any approval is not granted. These is no requirement to exclude based on a project's adverse environmental impacts. There is also no requirement to stop the referral of projects that would increase the likelihood of freshwater species extinctions, irreversibly pollute freshwater, or cause risk to human health. The criteria includes projects that "support primary industries" which is wide enough to include large-scale intensive dairying conversions. This will have a significant adverse effect on our already stressed freshwater

fisheries and on iwi and hapū aspirations for freshwater.

59. The Government's recent appointment of the non-statutory Fast Track Advisory Group to consider projects and advise the Joint Ministers on what projects should be included in Schedules 2A and 2B does not alleviate these concerns. The Fast Track Advisory Group was appointed without appropriate consultation and engagement with iwi and hapū or consideration of the Crown's Te Tiriti o Waitangi obligations.

60. As noted above, listed projects were not included in the FTA Bill when introduced and referred to the Select Committee and therefore cannot be scrutinised by the public as part of this process. Constitutionally, it is the Select Committee's role to examine and decide upon the list of projects to be included in the law, based on detailed submissions by experts, stakeholders, and the public.

61. Extraordinarily the Minister for the Environment is excluded from the referral process and is not considered to be a relevant Minister from which the Expert Panel must seek feedback (for listed and referred projects). Of further concern, with the change of government, is that the Minister for the Environment now also sits outside of Cabinet.

62. This is an unprecedented move and will likely motivate consent applicants to withdraw from their current processes to join this far more permissive one.

Amendment sought

63. Te Wai Māori seeks that Schedule 2 is removed from the FTA Bill entirely or brought into the Select Committee process so that listed projects can be the subject of public scrutiny.

Te Tiriti o Waitangi settlements and recognised customary rights clause

64. Under clause 6 all persons exercising functions under the FTA Bill must act in a manner that is consistent with the obligations arising under existing Treaty of Waitangi settlements; and customary rights recognised under the Marine and Coastal Area (Takutai Moana) Act 2011, Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 or the NHNP Act.[3]

No amendment sought

65. Te Wai Māori supports clause 6, and seeks its retention, as a limited baseline recognition of iwi and hapū rights.

66. However, we submit that this clause does not go far enough to uphold and protect iwi and hapū rights and interests in the FTA Bill.

Impact on iwi and hapū who have not settled their Treaty claims

67. The FTA Bill does not protect iwi and hapū who have yet to settle their Treaty grievances. The use of the term 'existing' Treaty settlements in clause 6(a) means unsettled iwi and hapū are exempt. Furthermore, the clause 18 ineligibility criteria does not protect land that has been earmarked for return under settlement. The recognised negotiation mandates and current negotiations for Treaty settlements to be addressed in the agency report prepared under clause 13 do not go far enough.

68. Te Wai Māori again reiterates the importance of the role played by existing legislation (sections 6(e), 7(a) and 8 of the RMA, section 4 of the Conservation Act) in safeguarding iwi and hapū rights, interests and aspirations, including in freshwater and freshwater fisheries.

Amendment sought

69. Te Wai Māori seek deletion of the word 'existing' from clause 6(a), and the addition of land under consideration for return through settlement to the clause 18 ineligibility criteria.

Ineligibility criteria

<u>The ineligibility criteria fails to protect iwi, hapū and Māori landowner interests</u>

70. There are very few projects that would be ineligible. The ineligibility criteria for non-listed projects to use the fast-track process is narrowly framed, meaning many projects are likely to qualify.

71. In general, under the FTA Bill only projects on areas with a high conservation status under conservation legislation, projects that are on 'identified Māori land' (defined under clause 4 of the Bill) or land returned under Treaty settlement or in an area of a recognised takutai moana right are ineligible for the FTA process. In addition, applications must not include an activity on Māori customary land or land set apart as a Māori reservation under Te Ture Whenua Māori Act 1993.

72. The criteria provides very little protection against inappropriate projects as in practice:

(a) many iwi are yet to settle their Treaty claims;

(b) only limited conservation land has been the subject of full assessment, meaning not all high-value land is protected by high conservation status.

73. The ineligibility criteria also takes an inconsistent approach. It overrides water conservation orders and excludes "Schedule 4" Crown land situated in and around the Coromandel Peninsula, and the internal waters of the Coromandel Peninsula.

Prohibited activities can be approved

74. Activities currently categorised as prohibited activities under the RMA (activities that have been deemed prohibited under a regional or district plan) are able to apply for fast-track consent approval under clause 17(5). This directly overrides community and iwi and hapū plan decision-making. Examples of projects that have been declined because of their potential for significant adverse effects on the environment include coal mines, dams and marine farms.

75. The Ministry for the Environment has pointed out that prohibited activities often have "significant environmental or human health effects" and are the most environmentally degrading activities in sensitive locations. They are also likely to have long ranging and irreversible effects, including on freshwater and freshwater fisheries. The Bill allows Joint Ministers to refer projects to fast-track where central government itself, or councils (following consultation with local communities and scrutiny by the Courts), have already explicitly banned that activity.

76. A consequence of this proposal is that projects that breach limits and targets in regional plans (i.e., water quality limits and targets, where those have been set to address deteriorating water quality at a local level) would be considered eligible, directly overriding regional councils and community catchment decision-making.

Applications from previously declined activities open for approval

77. There is nothing in the FTA Bill that prevents an application that was previously declined through an RMA process, or an application that was declined by an Expert Panel or Joint Ministers, from re-applying for fast-track consent approval. In fact it would appear that this is being encouraged and provided for through this Bill.

78. An example of this is the Trans-Tasman Resources (TTR) proposal for iron sand mining on the West Coast which has previously been declined. TTR wanted to extract up to 50 million

tonnes of the seabed each year for 35 years in shallow water between 22km and 36km off Pātea. After extracting iron, titanium and vanadium the mining ship would discharge 45 million tonnes of sediment, which TTR claimed would then settle harmlessly on the seabed.

79. The Supreme Court blocked the mining project and overturned consents approved by the EPA, sending it back to the EPA following a long, drawn-out fight by iwi, fisheries companies and environmental groups. The Supreme Court insisted that the EPA take a "broad and generous" view of its Treaty of Waitangi obligations and take into account tikanga and kaitiakitanga. TTR recently pulled out of consent hearings and released a statement on 8 April 2024 saying it had been invited (by the Government) to apply for the fast-track consenting process. This is an egregious outcome that sweeps aside a ten-year battle by iwi and others to protect precious oceans off the coast of Aotearoa.

80. In addition, applications that are not "shovel ready" could potentially come back and forth into the process which is administratively wasteful. There should at the very least be a minimum two-year stand down time period for such applications.

81. Te Wai Māori is fundamentally opposed to projects being able to use the FTA Bill to resubmit an application that has already been declined on environmental grounds.

Amendment sought

82. Te Wai Māori seeks that:

(a) all land that is listed in Schedule 4 of the Crown Minerals Act is included in the FTA Bill's clause 18 ineligibility criteria;

(b) activities categorised as prohibited activities under the RMA are included in the FTA Bill's clause 18 ineligibility criteria;

(c) projects declined under the FTA Act by Joint Ministers are ineligible to re-apply for a minimum period of 24 months;

(d) projects declined due to adverse environmental effects (under the RMA or other legislation within the scope of the FTA Bill) must show that the project will not have the adverse effect the subject of decline, before being accepted for listing or referral.

No amendment sought

83. Te Wai Māori also seek that:

    (a) the ineligibility criteria in clause 18 are otherwise retained, particularly:

        (i) projects on land returned under a Treaty settlement or on 'identified Māori land', unless agreed to in writing by the relevant landowner (clause 18(a)); and

        (ii) projects on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993 (clause 18(b)).

Timeframes

84. Process timeframes in the FTA Bill are too short.

85. The timeframes for iwi and hapū to comment on proposed projects is entirely unreasonable and impractical. There is insufficient time to allow for input that would support decision-makers to get to grips with "the actual and potential effects on the environment of allowing an activity".[3] This is critical information for the Expert Panel to consider when making an informed recommendation to the Joint Ministers.

86. The short timeframes within which iwi and hapū can comment also prohibits their ability to provide the necessary detailed information required for large-scale projects. This is especially problematic given the increasing level of detailed information that must be supplied by an applicant to the Expert Panel and the likelihood that multiple proposals will be considered at the same time in a region.

87. There is also a huge question mark over how Expert Panel(s) will get through the multiple listed projects proposed for Schedule 2A in the current timeframes.

    Amendment sought

88. Te Wai Māori seeks that invitations to comment or provide information from invited groups are extended to **20 working days** as a minimum.[4]

[3] FTA Bill Schedule 4, clause 34(1).

[4] This will require included amendment to clause 19(5); Schedule 4, clause 21(1); Schedule 4, clause 28 and Schedule 12, clause 5(b).

Climate change

89. The effects of climate change on water temperatures, flows and coastal environments are impacting our freshwater species and ecosystems. It is particularly troubling in regions that are overallocated and are now subject to increased drying effects.

90. The FTA Bill does not require consideration of the impacts a project may have on climate change, or the importance of aligning decisions with emission reduction plans or targets/budgets under the Climate Change Response Act 2002 (or relevant international obligations like the Paris Accord).

91. The consideration of climate change in decision-making is particularly critical with the additional environmental challenges presented by climate change, including severe weather events such as cyclones and flooding, warming oceans and sea level rise, now and in the immediate future.

KEY FEATURES OF RESPONSIBLE FAST TRACK LEGISLATION

92. Responsible fast-track approval processes under new legislation must, as a minimum:

    (a) recognise and provide for the sustainable health and wellbeing of the environment;

    (b) recognise and uphold Te Tiriti o Waitangi settlement frameworks and arrangements (in terms of purpose, principles and processes);

    (c) recognise and provide for the rights and interests of iwi and hapū in relation to te taiao (including purposes and principles in relevant natural resource legislation and planning/policy instruments – e.g., sections 6(e), 7 and 8 of the RMA and section 4 of the Conservation Act). It is noted also that most Tiriti settlement arrangements have been expressly constructed with reference to those existing statutory frameworks; and

    (d) provide for and incentivise the active participation of iwi and hapū from the outset of any infrastructure and development projects.

CONTACT DETAILS

If you would like to discuss this response please contact:

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