SUBMISSION BY IARAU LTD. ON INFRASTRUCTURE, DEVELOPMENT AND PRIMARY SECTOR NATIONAL DIRECTION

Ministry of Environment — Manatū Mō Te Taiao

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1.0 POSITION

Iarau's position is that the National Direction Package 1 (Infrastructure and Development) and Package 2 (Primary Sector) proposals are fragmented and risk undermining Māori rights, interests, and environmental protections. While we acknowledge the need for more effective infrastructure and primary sector regulation, these changes must not proceed without integrated management, meaningful engagement with iwi and hapū, and strong safeguards for Te Tiriti o Waitangi and the taiao.

We oppose the progression of these proposals outside of the broader legislative reforms intended to replace the Resource Management Act 1991 (RMA). Releasing significant policy and regulatory proposals in isolation, without due regard to their interdependencies, creates confusion, policy misalignment, and a real risk of cumulative harm to Māori rights, interests, and the taiao.

We call for a reset of the process, one that prioritises meaningful Tiriti based partnership, enables co-design, upholds Māori values, and ensures Māori led solutions are resourced, recognised, and embedded across all domains of national direction.

2.0 INTRODUCTION

Iarau is a rangatahi-led, innovative consultancy based in Rotorua. We serve iwi, hapū, and hāpori Māori across Aotearoa, and work closely with genuine partners and tangata tiriti to deliver successful collaborative outcomes. Established with the core value of Ngākau Tapatahi (collective integrity), Iarau specialises in advancing Māori aspirations through environmental and urban planning, policy development, project management, media and communications, and events.

Our mahi centres on empowering Māori voices and perspectives within governance, resource management, and planning frameworks, guided by tikanga Māori and Te Tiriti o Waitangi. With a dynamic team, we bridge traditional Māori knowledge with contemporary tools to deliver high-quality, impactful client outcomes.

Iarau's vision is to build capacity and capability for iwi and hapū, ensuring they are equipped to exercise their *tino rangatiratanga* (absolute authority) while navigating the challenges of modern governance and resource management. By working in true partnership with our communities and stakeholders, Iarau contributes to a future grounded in equity, sustainability, and the values of Te Ao Māori.

This document takes the following format:

3.0 OVERARCHING COMMENTS

Iarau request that any changes of this scale and nature should be incorporated into, or made under, the upcoming replacement legislation for the RMA, following a robust process of engagement and consultation with iwi and hapū. This includes ensuring adequate time, resources, and appropriate processes to enable meaningful participation. Meaningful participation requires both time and genuine engagement, especially where proposed changes may impact Māori rights, interests, and responsibilities under Te Tiriti o Waitangi, as well as other relevant statutory obligations and legislative frameworks.

We are deeply concerned by the scale of the changes being proposed, particularly given the limited engagement with Māori and the compressed timeframes for consultation, and that a fragmented approach risks undermining the ability of iwi, hapū, and hapori Māori to gain a comprehensive understanding of the full scope and implications of the packages. Without a clear, consolidated view of all the proposed legislative and policy changes, there is a real risk that existing protections for Māori rights and interests may be weakened, removed, or left unaddressed in areas. There is a risk that key protections could be removed in instruments and not reinstated or aligned elsewhere. It is essential that iwi, hapū, and hapori Māori are provided with full visibility over the entire suite of changes, so that rights and interests can be appropriately recognised and protected across all relevant legislative and regulatory instruments. The current process does not provide adequate time or space for Māori to fully understand the implications of the proposals or to respond in a way that reflects the significance of the issues at stake. We call for a transparent and consolidated process to ensure consistency with Te Tiriti o Waitangi and avoid gaps or inconsistencies across domains.

We are also concerned that this process has limited awareness among iwi, hapū, and hapori Māori, particularly those outside post-settlement governance entities (PSGEs). As a result, feedback may not be inclusive of the full breadth of iwi, hapū, and hapori Māori perspectives and interests. This risks excluding the voices of mana whenua who are critical to sustainable, place-based governance. Additionally, we are also concerned about implementation burdens, yet there is no corresponding commitment to resourcing iwi and hapū to engage, implement, or monitor the proposed changes. This is an inequity that must be addressed in any proposed changes or reform.

4.0 INFRASTRUCTURE PROPOSALS - PACKAGE 1

4.1 National Policy Statement for Infrastructure – NPS-I

Iarau acknowledges the infrastructure efficiency gap highlighted in the discussion document for the National Policy Statement for Infrastructure (NPS-I) and recognises the need for improved infrastructure delivery to meet the evolving needs of communities across Aotearoa. However, infrastructure development must not override our responsibilities to protect and uphold the mauri of the taiao and the enduring rights and interests of iwi and hapū.

Balance Between Development and Environmental Protection

While supporting the intent to enable infrastructure development, Iarau emphasises the importance of a balanced, holistic approach. Infrastructure must be delivered in a way that sustains environmental and cultural values and upholds intergenerational wellbeing. Efficiency should not come at the expense of wāhi tapu, loss of ecosystems, and natural landscapes protected under section 6 of the RMA.

Scope and Māori Crown Partnership

The breadth of infrastructure and infrastructure supporting activities captured under the NPS-I requires robust and early engagement with iwi and hapū. The impacts of activities such as quarrying and linear infrastructure are historically inequitable for Māori and our whenua and taonga. The NPS-I must therefore include explicit protections for culturally significant sites, significant natural environments, and provide for the development of iwi and hapū led infrastructure solutions.

Te Tiriti o Waitangi and its principles must be embedded within the objectives of the NPS-I, not simply referenced within engagement provisions. This is essential to ensure meaningful partnership and equitable outcomes for mana whenua.

Infrastructure Needs and Cultural Safeguards

The proposed recognition of operational and functional needs of infrastructure should not override the need to protect wāhi tapu, sites of significance and taonga Māori. Iarau is concerned that in practice, these needs may justify development in inappropriate locations unless stronger cultural and environmental safeguards are included.

Policies must prioritise avoiding adverse effects on culturally and environmentally significant areas and ensure iwi and hapū are involved in site selection and impact mitigation decisions.

Spatial Planning and Strategic Alignment

Iarau supports the alignment of infrastructure decisions with spatial planning and strategic documents. Iwi Environmental Management Plans, Freshwater Management Plans, and other Māori planning instruments must be recognised as strategic plans on par with those developed by local authorities.

Engagement and Regulatory Efficiency

Iarau supports efforts to reduce duplication and streamline regulatory processes. However, streamlining must not compromise the quality of engagement with iwi and hapū. Engagement must be early, resourced, and culturally competent. Māori input should be seen as a cornerstone of effective infrastructure planning, not an obstacle.

Environmental Effects and Section 6 Protections
Iarau is concerned that deprioritising the effects management hierarchy leaves section 6 values, including wāhi tapu, indigenous biodiversity, and natural character, vulnerable. Until the RMA is replaced, interim measures must ensure effects to these values are avoided or fully mitigated, with iwi and hapū participation in decision-making.

Reverse Sensitivity and Cultural Interface
Iarau oppose the proposed policies as currently drafted unless they are amended to better recognise and protect the rights and aspirations of iwi, hapū and hapori Māori, particularly in relation to papakāinga, marae, and other culturally significant developments on whenua Māori.

The current proposals risk elevating infrastructure interests above the mana, tikanga, and long-standing relationships of tangata whenua with their ancestral lands. Infrastructure, often imposed without proper partnership or historical redress, should not be afforded blanket protection that inhibits the expression of tino rangatiratanga and mana motuhake through papakāinga, marae, wāhi tapu, or culturally driven land use.

Papakāinga development is not a “sensitive activity” in the same way as general urban housing. It is an expression of whakapapa, identity, intergenerational belonging, and the practical realisation of Treaty-based development. The policies must be amended to include specific provisions that protect Māori led development from being subordinated to existing or planned infrastructure, particularly on whenua Māori. This includes requiring infrastructure providers to avoid, remedy, or mitigate their effects on existing or planned Māori development, not the other way around and explicitly excluding whenua Māori and culturally significant areas from being considered “interface conflict zones” unless meaningful, prior, and informed engagement has occurred and Māori aspirations are upheld.

Infrastructure development near or through whenua Māori must not limit future use or impose amenity or design constraints on Māori communities. The burden of adapting to infrastructure effects, such as noise, vibration, or restricted access, should not fall on Māori, especially when such infrastructure may have been developed historically without Māori consent or participation.

Implementation and Monitoring
Implementing the NPS-I will place significant demand on iwi and hapū. Support must be provided to build the capacity of Māori entities to participate in planning, consenting, and

monitoring processes. Independent oversight by iwi and hapū should be built into monitoring frameworks, and Treaty settlement commitments must be upheld throughout implementation.

Recommendations

1. Embed Te Tiriti o Waitangi and its principles within the objectives and outcomes of the NPS-I, not just in engagement policies;
2. Require meaningful, resourced, and early, and ongoing engagement with iwi and hapū at all stages of infrastructure planning and consenting;
3. Explicitly protect wāhi tapu, culturally significant landscapes, significant natural environments and taonga species by ensuring infrastructure functional/operational need do not override section 6 RMA protections;
4. Recognise iwi planning documents as strategic documents equal to those of councils;
5. Strengthen environmental safeguards during this reform period to uphold existing RMA protections;
6. Provide a policy directive that recognises and provides for the rights of iwi, hapū and hapori Māori to develop, use and occupy their land in accordance with their tikanga, including for papakāinga, marae, and other culturally significant purposes, without being unduly constrained by infrastructure-related planning requirements;
7. Provide resourcing for iwi and hapū to support implementation, including training, technical support, and participation in monitoring; and
8. Ensure independent Māori oversight of implementation and monitoring to support accountability and uphold Treaty obligations.

4.2 National Policy Statement for Renewable Electricity Generation

Iarau supports the Government's goal to accelerate renewable electricity generation (REG) and reduce emissions through the National Policy Statement for Renewable Electricity Generation (NPS-REG). However, this must be achieved in a way that upholds the mana of the taiao and reflects Te Tiriti o Waitangi partnership. Scaling REG infrastructure cannot be pursued at the expense of whenua, wai, and wāhi tapu, nor should it proceed without the meaningful inclusion of iwi and hapū in planning and decision-making.

Partnership and Māori-led REG

Current proposals to enable REG focus heavily on consenting and infrastructure protection but fail to address the exclusion of iwi and hapū from early stage energy planning. The NPS-REG must include provisions that empower iwi and hapū led energy development and governance, particularly on whenua Māori.

Definitions in the NPS-REG must explicitly acknowledge iwi and hapū led energy projects as part of the broader REG landscape. Care must be taken to ensure terms like "community-scale" do not exclude whānau or hapū initiatives. REG is a key pathway to energy sovereignty and climate justice for mana whenua, and the NPS-REG must actively enable this.

Strengthening Cultural Protections and Te Tiriti Obligations

While the proposed objective references cultural wellbeing, it must go further. The concepts of kaitiakitanga, tino rangatiratanga, and mana whakahaere over energy resources must be embedded within the objective. This includes recognition of iwi and hapū relationships with whenua and wai, and the role of energy in realising self-determination.

Iarau opposes enabling REG in areas not protected under section 6 of the RMA without clear policy safeguards. Many culturally significant landscapes remain unprotected in law, and development in these areas risks cumulative and irreversible harm. A precautionary, values-based approach is essential.

Existing Infrastructure and Re-consenting

While we support efforts to maximise existing REG capacity, the policy to consider only “additional or different effects” at the re-consenting stage is unacceptable and Iarau oppose this. Legacy infrastructure that has caused or continues to cause harm must be reviewed in full, particularly where it impacts taonga, landscapes, or the mana of iwi and hapū. Re-consenting must trigger re-engagement with mana whenua and reassessment of all cultural and environmental effects.

Cumulative REG Gains and Locational Need

Iarau supports giving weight to cumulative gains of REG capacity, as this can create a more enabling environment for diverse REG projects, including iwi and hapū led schemes. However, the concept of “functional or operational need” must not justify development on wāhi tapu, whenua Māori, or other significant areas without informed consent from mana whenua. Cultural and environmental thresholds must not be eroded in the pursuit of efficiency.

Providing for Māori Interests

The proposed policy to provide for Māori interests is a long-overdue improvement, but the language must be strengthened. Phrases such as “in appropriate circumstances” dilute the intent. Iarau seek the requirement of co-governance of REG projects on Māori land or affecting Māori rights, resourcing Māori-led innovation in renewable energy, and elevating iwi and hapū spatial and energy strategies within statutory planning frameworks. These changes will ensure Māori rights are not merely acknowledged but actively upheld in REG decision-making.

Implementation and Monitoring

The successful delivery of the NPS-REG depends on effective implementation measures. This includes dedicated resourcing to enable iwi and hapū to participate meaningfully in planning, consenting, and governance processes. It also requires the integration of iwi and hapū planning documents into energy and spatial planning frameworks, ensuring that Māori perspectives and priorities are embedded from the outset. Additionally, independent Māori-led monitoring must be established to assess the impacts of REG on significant sites and environments, taonga species, wāhi tapu, and the exercise of Treaty rights.

Without appropriate resourcing and structural support, the proposed policy settings risk placing an additional burden on iwi and hapū to protect and advocate for their own interests within an already under resourced system.

Recommendations

1. Strengthen the NPS-REG objective to explicitly reference kaitiakitanga, tino rangatiratanga, and mana whenua roles in energy decision-making;
2. Require co-governance of REG projects that impact whenua Māori or cultural interests;
3. Include iwi and hapū led energy initiatives in NPS-REG definitions and remove language that could limit support to narrowly defined "community" projects;
4. Reject the policy to limit re-consenting assessments to "new or different" effects. Full re-evaluation of legacy REG projects must occur, especially where mana whenua have identified cultural or ecological harm;
5. Prohibit REG development on whenua Māori or wāhi tapu without informed consent from mana whenua, regardless of functional or operational need;
6. Provide resourcing and structural support for iwi and hapū participation in REG planning, consenting, governance, and monitoring; and
7. Elevate Māori energy and spatial strategies as part of national and regional infrastructure planning.

4.3 National Policy Statement on Electricity Transmission (reform to National Policy Statement for Energy Networks)

Iarau acknowledges the importance of a secure and resilient electricity network to support Aotearoa's climate response and energy transition. However, these goals must not come at the cost of cultural identity, environmental integrity, or Māori rights. The development and protection of electricity infrastructure must be carried out in partnership with iwi and hapū, in a way that upholds Te Tiriti o Waitangi and respects the mana of the taiao.

Balanced Policy for Networks and Cultural Values

We support the expanded scope of the National Policy Statement for Energy Networks (NPS-EN) to include electricity distribution, reflecting the interconnected nature of

modern energy systems. However, this expansion must not be used to justify the encroachment of infrastructure on Māori land, wāhi tapu, or culturally significant landscapes. Policy settings must balance energy security with environmental protection and cultural rights.

The proposed definitions distinguishing 'routine' and 'non-routine' activities are helpful for clarity, but these definitions must not be used to bypass engagement with mana whenua. Even minor or 'routine' works can carry cumulative or indirect impacts on taonga and must trigger appropriate notification and cultural input.

Iarau seek that relationship agreements between network providers and iwi/hapū must be established to define any activity as routine or non-routine and have input into how works are undertaken. This ensures all works have tikanga based guidelines and iwi and hapū determine appropriateness of works.

Embedding Te Tiriti and Recognising Energy as a Taonga

The objective of the NPS-EN must embed the principles of Te Tiriti o Waitangi within all objectives and policies, recognise energy as a taonga, with whakapapa to the whenua and wai it is generated from, and support iwi and hapū led models of energy distribution and governance. Electricity networks must not be framed solely through technical or utilitarian lenses. Decision-makers must adopt a values-based and intergenerational approach.

Route and Site Selection

The proposal to give weight to the preferences of Transpower and distribution companies in route selection risks sidelining local voices and Te Tiriti rights. Iarau supports technical input but seeks that mandatory cultural impact assessments are undertaken for all new corridors with early engagement to identify exclusion zones for culturally sensitive areas. Further, we require that site assessments must be co-developed with mana whenua with adequate resourcing for iwi and hapū participation in route and site selection.

Protecting Section 6 Values and Managing Effects

Iarau strongly oppose any policy that enables infrastructure in areas protected under section 6 of the RMA on the basis of "functional or operational need." Such justifications must not override wāhi tapu, historic sites, or significant natural features. These landscapes hold intrinsic value and must be safeguarded, not sacrificed for infrastructure. We also oppose enabling development with adverse effects in areas not currently protected under national direction. Many culturally and environmentally significant sites remain unprotected by regulation. A precautionary, culturally respectful approach is necessary.

Māori Interests and Partnership

Iarau strongly supports the policy direction on Māori interests, however, in its current form, the policy lacks the necessary strength and clarity to give effect to genuine Tiriti-based outcomes. The requirement to "recognise and provide for" must be elevated to reflect a true partnership between the Crown and Māori.

Iarau recommends the co-governance of infrastructure projects that impact Māori rights or land, ensuring shared decision-making and accountability. There should also be dedicated support for iwi and hapū-led electricity distribution initiatives, particularly on whenua Māori. National and regional planning processes must include iwi-led spatial and energy strategies as integral components. Finally, the policy must acknowledge the historical and ongoing sacrifices made by iwi and hapū, as well as the impacts on whenua and taonga Māori, in the development of national transmission infrastructure, and recognise the enduring cultural significance of the land it continues to traverse.

Strategic Planning and Implementation

Iarau supports the spatial integration of electricity networks, however, implementation must consider Māori housing, marae, and development aspirations, not solely urban intensification. It must also recognise iwi and hapū planning documents, such as Iwi Environmental Management Plans, Master Plans, and Freshwater Plans, as statutory inputs. Furthermore, it must establish mutual obligations for consultation, ensuring that developers and network providers engage directly with iwi and hapū, rather than solely with each other.

Implementation and Treaty Alignment

For the NPS-EN to be both effective and equitable, its implementation must uphold Treaty settlement commitments and the principles of Te Tiriti o Waitangi. It must also recognise iwi environmental and strategic plans as statutory documents that carry weight in decision-making processes. To achieve this, adequate resources must be provided to enable iwi and hapū to participate meaningfully in electricity planning, consenting, and monitoring. Additionally, the policy must embed independent iwi and hapū led monitoring to assess the impacts of electricity infrastructure on taonga and culturally significant landscapes.

Recommendations

1. Strengthen the objective to explicitly reference Te Tiriti o Waitangi, kaitiakitanga, and tino rangatiratanga;
2. Prohibit infrastructure development in areas with section 6 RMA protections on the basis of operational need alone;
3. Require that routine and non-routine works are defined by iwi and hapū from the outset, with established cultural processes guiding appropriateness;
4. Mandate cultural impact assessments and early engagement for all route and site selection processes;

5. Support iwi and hapū led electricity distribution and governance, especially on whenua Māori;
6. Elevate Māori interests policy from "recognise and provide for" to partnership, and resource Māori strategic planning and engagement; and
7. Embed monitoring frameworks led by iwi and hapū to assess and address impacts on taonga and whenua.

4.4 National Environmental Standards for Electricity Transmission Activities

Iarau supports the intent to streamline national environmental standards for electricity infrastructure and EV charging to enable Aotearoa's energy transition through the National Environmental Standards for Electricity Transmission Activities (NESETA). However, regulatory efficiency must not override Te Tiriti o Waitangi, iwi and hapū rights, or kaitiakitanga responsibilities. Enabling infrastructure must be balanced with protection of whenua Māori, wāhi tapu and the taiao.

Transmission Network Works and Routine Activities

Permitting more extensive "routine" transmission works risks cumulative cultural and environmental harm. Iarau seeks that relationship agreements between network providers and iwi/hapū must be established to define any activity as routine or non-routine and have input into how works are undertaken. This ensures all works have tikanga based guidelines and iwi and hapū determine appropriateness of works.

National Grid Corridor and Māori Land Use

Rules designed to protect the National Grid must not come at the expense of Māori land development, papakāinga, or the establishment of cultural infrastructure. Iarau seeks direct consultation with Māori landowners to ensure their voices are heard in planning and regulatory processes. We also call for exemptions or alternative provisions for cultural uses of land affected by the grid. In addition, any such rules must include a thorough assessment of their impacts on Māori land development strategies.

Regional Activities and Distribution Infrastructure

Permitting these activities without mandatory conditions that uphold iwi and hapū participation, ensure alignment with tikanga Māori, and protect Māori rights and interests in freshwater and the coastal marine area is entirely unacceptable. Such a move would not only contravene the principles of Te Tiriti o Waitangi but also risk direct breaches of existing Treaty settlements and co-governance arrangements.

This proposal highlights our concern of the current fragmented approach. It is not integrated with the Freshwater Package or aligned with Te Mana o te Wai. By proposing fundamental shifts in environmental permissions outside of a coherent freshwater framework, the Crown undermines its own policy integrity and creates uncertainty for all stakeholders.

We reiterate our concern that fragmented proposals like this marginalise the role of iwi and hapū in resource management and freshwater governance. The bypassing of Māori input in favour of centralised, one-size-fits-all rules, particularly under the guise of "efficiency" or "streamlining", is a breach of the Crown's obligations and will not be accepted.

Stringency

Iarau strongly oppose banning greater stringency in sensitive areas. Councils must retain the ability to uphold higher protections in their localities based on input from iwi and hapū to protect important sites and natural environments.

EV Infrastructure

Iarau supports the development of EV infrastructure as a step toward a more sustainable energy future. However, large-scale public or standalone EV charging stations must still undergo thorough assessment for potential cultural impacts. Any charging hubs proposed on or near whenua Māori must not proceed without prior and informed consent of the relevant iwi and hapū. Furthermore, the rollout of EV infrastructure must actively support iwi and hapū led energy sovereignty initiatives and ensure equitable access to charging services for remote Māori communities.

Implementation and Treaty Consistency

The National Grid rules risk constraining the use of Māori land and undermining Māori development aspirations. To address this, implementation must include comprehensive mapping of areas where infrastructure intersects with whenua Māori. It must also involve targeted and adequately resourced engagement with iwi and hapū to ensure meaningful participation. Additionally, iwi and hapū led monitoring and clear pathways for ensuring Treaty compliance are essential, particularly in areas subject to Treaty settlements or where whenua has been returned.

Recommendations

1. Require that the NES-ENA uphold Te Tiriti o Waitangi and its principles as foundational;
2. Avoid compounding constraints on Māori land and cultural values; and
3. Ensure iwi and hapū are partners in energy development, not observers. A just energy future must be determined with iwi and hapū, not imposed upon them.

4.5 National Environmental Standards for Telecommunication Facilities

Iarau acknowledge the critical role of telecommunications infrastructure in national connectivity, resilience and safety. However, increasing regulatory permissiveness must not override the rights of iwi and hapū, nor undermine environmental and cultural protections. National direction must support modern infrastructure while safeguarding ancestral landscapes and recognising mātauranga Māori, and tino rangatiratanga.

Cultural and Environmental Integrity

While updating the National Environment Standards for Telecommunication facilities (NES-TF) to reflect evolving technologies and urban intensification is necessary, the proposed expansion of permitted activities risks bypassing mana whenua in decisions that affect whenua, wāhi tapu and cultural heritage. Provisions must uphold the role of iwi and hapū as kaitiaki, particularly in urban areas, on whenua Māori, and near significant sites.

Infrastructure Siting and Visual Effects

Iarau do not support blanket increases in infrastructure height or massing across all zones. Visual and spatial intrusions, especially near marae, urupā, and maunga, must be culturally assessed. Permitted activity thresholds should be tiered for culturally sensitive areas, and mana whenua must be engaged early.

Pole and Road Reserve Management

Removing siting limits for poles in the road reserve without safeguards shifts power away from communities. Replacing site-based criteria with "network design" and "commercial feasibility" deprioritises cultural values. Mana whenua should be able to influence pole placement, especially near wāhi tapu and Māori land.

Renewable Energy and Temporary Facilities

Iarau support enabling renewable energy infrastructure for network resilience, particularly in remote areas. However, installations (whether permanent or temporary) must not occur near wāhi tapu or culturally sensitive landscapes without mana whenua approval.

Fibre Connections to Heritage Sites

Broad support is given to enabling fibre installation to marae and heritage buildings. Mana whenua must provide approval for installation, guide the installation process, ensure it aligns with their tikanga, and ensure damage to whakairo and culturally significant facades is avoided.

Planning Flexibility and Monitoring

Allowing councils to adopt more lenient standards is appropriate. However, preventing councils from applying more stringent rules in culturally or environmentally sensitive areas is unacceptable. Local authority discretion must be preserved, in partnership with iwi and hapū.

Recommendations

To ensure the NES-TF remains both enabling and culturally appropriate, Iarau recommend the following:

1. Embed safeguards for cultural sites

- Require cultural impact assessments for installations near marae, urupā, wāhi tapu and whenua Māori;
- tier permitted height and scale thresholds for sensitive zones; and
- enable mana whenua to identify exclusion zones for new infrastructure.

2. Retain local authority stringency
   - Allow councils, in partnership with iwi and hapū, to apply greater stringency where appropriate; and
   - do not limit local planning responses to cultural or ecological sensitivities.
3. Mandate early Māori engagement
   - Include iwi and hapū participation in decision-making for all new permitted activities; and
   - recognise iwi environmental management plans (IEMPs) as triggers for engagement.
4. Monitor cultural impacts
   - Develop a co-designed monitoring framework to assess cumulative cultural effects; and
   - require periodic reviews of permitted infrastructure in areas of cultural significance.
5. Respect temporary boundaries
   - Maintain notification requirements for temporary facilities on Māori land or near wāhi tapu, even during emergencies where practicable; and
   - ensure height and footprint limits for temporary sites do not become a backdoor to permanence.

Iarau support the goal of faster, resilient telecommunications but not at the expense of Māori rights, wāhi tapu, and cultural wellbeing. Tangata whenua must be partners, not bystanders, in shaping how infrastructure develops across Aotearoa. The NES-TF must reflect a genuine commitment to Te Tiriti o Waitangi, embedding co-governance, cultural safeguards, and enduring accountability into national direction.

5.0 DEVELOPMENT PROPOSALS - PACKAGE 1

5.1 National Environmental Standards for Granny Flats (Minor Residential Units)

Iarau supports the intent of the proposed National Environmental Standards for Granny Flats (Minor Residential Units) (NES-GF) as a step toward addressing Aotearoa's housing affordability and supply challenges. We particularly support the proposal to include Māori-purpose zones within the scope of the NES-GF as a permitted activity, as this could reduce some of the regulatory barriers that currently inhibit whānau, hapū, and Māori land trusts from developing smaller-scale housing options on their whenua. This approach may help enable intergenerational living, kaumātua housing, and incremental development aligned with whānau aspirations.

However, it is essential that implementation of the NES-GF does not proceed without meaningful consultation with iwi and hapū to understand if there are any concerns about the NES-GF and its potential effects that have not been addressed in the discussion document. An increase in permissiveness will remove the requirement to engage with iwi and hapū through PSGEs which may be of concern if appropriate protections are not in place for sites of significance, marae, Māori land, land returned under Treaty settlements or other matters of significance to iwi and hapū.

5.2 National Environmental Standards for Papakāinga

Iarau supports the intent of the proposed National Environmental Standards for Papakāinga (NES-P) as a necessary and overdue reform to enable the development of communal housing and associated activities on whenua Māori. We acknowledge the longstanding structural and regulatory barriers Māori landowners face in realising papakāinga aspirations and welcome the national direction that provides a consistent and enabling baseline across the Aotearoa.

Iarau support the permitted activity status for papakāinga development on specified Māori land types, including the recognition of ancillary non-residential activities that reflect whānau, hapū and iwi led kāinga. Enabling such development without the need for resource consent is a meaningful step toward restoring rangatiratanga, supporting intergenerational living, and realising Māori aspirations for kāinga based wellbeing.

However, we do not support the arbitrary limit of 10 homes. If whānau, trusts or collectives can meet the permitted activity standards, the number of homes should not be constrained by a blanket national cap. This limit fails to reflect the diversity of whenua Māori ownership and governance models, where a single block may be required to provide for numerous whānau over multiple generations and across extensive areas of land.

Determining the scale of papakāinga should be locally defined by Māori, based on tikanga, whenua capacity, whānau needs, and mana whenua spatial planning. A national limit restricts the ability of Māori to self-determine the appropriate development of their land and may undermine the collective purpose of ahikā and whakapapa based occupation.

We recommend removing the 10-house threshold and enabling whānau, hapū and trusts to develop papakāinga in accordance with local values and permitted activity standards that safeguard environmental and cultural integrity.

Iarau strongly support the provision allowing district plans to be more lenient than the NES-P. This flexibility is vital, as it enables mana whenua to shape planning rules that reflect their unique aspirations and relationships with place. Enabling more responsive and locally determined approaches alongside national direction is essential to uphold

the tino rangatiratanga of mana whenua and ensure the successful implementation of papakāinga development across the Aotearoa.

5.3 National Policy Statement for Natural Hazards

Iarau supports the intent of the proposed National Policy Statement for Natural Hazards (NPS-NH) as a necessary tool to guide risk-based, proportionate planning decisions in the face of increasing natural hazard risks and climate change impacts.

We acknowledge the importance of ensuring that new development occurs in safe and resilient locations. However, we are concerned that the proposed NPS-NH, if implemented without appropriate safeguards, may further constrain the ability of Māori landowners to develop their whenua. Many of these sites are already burdened by access, zoning, and infrastructure limitations, and are often located in hazard-prone areas due to historical land dispossession and marginalisation.

Iarau supports the use of best available information to inform risk assessment, and we emphasise that this must include mātauranga Māori. We encourage explicit recognition of mātauranga as a valid and valuable basis for understanding and responding to environmental risk, particularly where technical data may be limited or culturally misaligned.

We also recommend that implementation guidance be co-developed with iwi, hapū and Māori landowners to ensure equitable application and to avoid compounding development barriers for papakāinga and other Māori-led housing solutions. Consideration should be given to tailored provisions or pathways for development on whenua Māori, where risk mitigation is feasible and culturally appropriate.

While Iarau support the direction of the NPS-NH, its implementation must balance risk reduction with the need to enable Māori aspirations for whenua development, guided by Te Tiriti o Waitangi and its principles, in partnership with iwi and hapū.

6.0 PRIMARY SECTOR PROPOSALS - PACKAGE 2

6.1 National Environmental Standards for Marine Aquaculture

We generally support the intention to streamline reconsenting processes and enable innovation within the aquaculture sector, provided that proposals do not undermine Māori rights, interests, and participation in decision-making. We do not oppose the proposals in principle, particularly where they have been developed with the support of Treaty partners. However, we are concerned about aspects of the proposals that may diminish Māori input into decision-making and weaken existing legal safeguards. Additionally, we are concerned about proposals that would enable activities in new spaces, without adequately addressing the effects on Māori rights and interests, water quality, and customary access. Expanding existing consents in this way also risks creating inequities in space allocation.

We support and call for the continued use of Schedule 6 of the NES-MA, retaining and strengthening notification requirements and matters of control and discretion, including their scope to address effects on tangata whenua values, including customary access, and water quality. These elements must be retained to ensure that any changes do not bypass Treaty settlement outcomes or undermine Māori participation and engagement.

We also highlight our concern about the lack of sufficient time for engagement and analysis. The compressed consultation timeframe risks limiting the ability of PSGEs and other iwi and hapū groups to meaningfully assess the implications of the proposals. There has been insufficient analysis of the effects on Treaty settlements, Mana Whakahono ā Rohe or other statutory arrangements with councils, which are at risk of being displaced or excluded under the proposals. It is unacceptable for a regulatory change in the marine space to proceed without full consideration of these matters. Efficiency must not come at the expense of established relationships, legal obligations under Te Tiriti o Waitangi, or future opportunities for Māori in the aquaculture sector.

Research and trials: permitted activities

We recognise that enabling research and trials in aquaculture can promote innovation and sector development. Furthermore, we strongly support the retention and/or provision of all matters of control and discretion to address effects on tangata whenua values, including customary access, and water quality, and the use of Schedule 6 to seek views of tangata whenua.

However, we oppose the proposal to allow certain research and trial activities to proceed as permitted activities where these apply to unconsented or new marine spaces. We acknowledge there is provision for tangata whenua to be notified prior to the activity being undertaken, however, permitting research and trials would remove input from Māori, which may be provided for in engagement processes that are provided for under Treaty settlement redress mechanisms, the Marine and Coastal Area (Takutai Moana) Act 2011, or other legal frameworks. The Interim Regulatory Impact Statement itself acknowledges that permitting research in new space carries a risk of reduced input from tangata whenua. The lack of consultation requirements to address effects on tangata whenua views, combined with the immediate legal effect of the permitted activity rules, would exclude Māori from the process, a direct contradiction of the Government's own objectives to uphold Treaty settlements and maintain relationships with Māori. The proposal must contain safeguards to mitigate this risk.

We urge that the permitted activity pathways for research and trials be amended to require engagement with iwi and hapū and to address effects on tangata whenua values, particularly in areas where customary marine title, statutory acknowledgements, or Treaty settlement rights apply.

6.2 National Environmental Standards for Commercial Forestry

Addressing council ability to introduce more stringent rules than in the NES-CF

Iarau acknowledges the intent to provide greater operational certainty for foresters by amending regulation 6(1)(a) to be more specific about the criteria under which councils can implement stricter rules than the NES-CF. We support clarifying when and how more stringent rules can be applied, provided these decisions are grounded in evidence.

We recognise that the NES-CF addresses erosion and sedimentation risks through a number of ways. We also note the policy documentation affirms that, where councils can demonstrate a need for additional controls to manage clearly defined areas of land and minimise impacts on downstream infrastructure, they should be allowed to impose stricter rules. However, we oppose the proposed narrowing of regulation 6(1)(a), along with the repeal of regulation 6(4A), due to concerns that this may reduce environmental and cultural protections in some regions compared with the status quo. In particular, the repeal may undermine the ability of councils to maintain existing plan rules that are more stringent than the NES-CF, where these rules have been developed to give effect to the National Policy Statement for Freshwater Management (NPS-FM). In these cases, proposed changes could lead to poorer outcomes, especially in catchments where localised effects require tighter regulation of forestry activities.

We are also concerned by the proposed requirement that severe erosion risk and significant adverse effects on receiving environments must be present to justify stringency. Additionally, there is risk that the term “downstream infrastructure” will not adequately capture the risks to cultural values for freshwater management objectives. In our view, Councils must retain some flexibility to introduce more stringent rules to achieve objectives that give effect to the NPS-FM, especially where these objectives reflect Māori priorities and responsibilities for wai. We urge that the scope of the required evidence base also includes provision for Māori rights and interests in relation to freshwater management objectives.

Councils must retain sufficient discretion and flexibility to introduce more stringent rules in order to meet freshwater objectives, particularly where these objectives reflect Māori rights and interests, including the exercise of kaitiakitanga, the protection of wai tapu, and the restoration of mauri. We urge that the evidence base required to justify stricter rules explicitly allow for localised planning objectives, especially those designed to give effect to the NPS-FM and TMotW. Additionally, a modified form of regulation 6(4A) must be retained, enabling councils to act on mana whenua identified forestry risks.

Introducing a slash management risk assessment approach

We support a risk-based approach using Slash Mobilisation Risk Assessments (SMRA). This represents a locally responsive model for managing forestry slash. However, we are

concerned that the costs and complexity of SMRA compliance may fall disproportionately on Māori landowners, particularly those holding land in high-risk erosion zones such as LUC 6 and 7.

We recommend that resourcing and technical support be provided to assist Māori landowners and forestry entities in understanding and applying the SMRA framework. We also support co-design of SMRA templates and guidance materials in partnership with Māori forestry trusts and representative bodies. These actions would support effective implementation while recognising the unique structural and historical position of Māori in the forestry sector.

6.3 New Zealand Coastal Policy Statement

The proposed changes to strengthen activity enabling policies (Policies 6 and 8) represent a significant shift toward prioritising development, particularly for infrastructure, renewable energy, aquaculture, and resource extraction in the coastal marine area (CMA). While this may unlock economic opportunities for Māori, including those with aquaculture settlement assets, it risks undermining core environmental protections. Iwi and hapū have long upheld kaitiakitanga of the coastal and marine environment, and the weakening of “avoid” requirements in protection policies, particularly for biodiversity and natural character, could diminish that role.

The proposed changes to the New Zealand Coastal Policy Statement (NCPS) could expose culturally significant areas such as wāhi tapu and kai gathering habitats, to development pressure, particularly from non-Māori interests. The proposal does not clearly define how cultural values will be safeguarded when activity enabling policies are granted greater weight.

Expanding the test from "functional need" to "functional or operational need" lowers the threshold for development in the CMA. This may increase pressure on coastal spaces already affected by colonisation, pollution, and exclusion. While the flexibility might support iwi and hapū led projects, it also risks prioritising convenience and profit over tikanga Māori and intergenerational sustainability.

A key concern is the lack of clarity on how competing interests will be balanced, particularly where iwi and hapū wish to exercise tino rangatiratanga over marine areas or where developments could compromise Treaty settlement redress, customary marine title, or ongoing aspirations for marine-based economic and cultural revitalisation.

Aquaculture and Settlement Space

The amendments to Policy 8 (aquaculture) offer potential benefits for iwi by directing councils to “provide for” aquaculture in settlement areas. This aligns with the Crown’s obligations under the Māori Commercial Aquaculture Claims Settlement Act 2004 and could facilitate long-awaited development opportunities.

Importantly, the inclusion of "cultural and environmental benefits" alongside social and economic benefits broadens the evaluative lens for aquaculture consents. This better reflects iwi and hapū values and acknowledges the multiple roles aquaculture may play in cultural resilience, food security, and ecological restoration. However, how these benefits will be assessed and weighted in decision-making remains unclear and should be further developed with iwi and hapū input.

Risks to Māori Rights and Interests

While the policy proposals do not alter Treaty settlement mechanisms or obligations under statutes like the Marine and Coastal Area (Takutai Moana) Act 2011, the cumulative effect of enabling more priority activities may still erode the mana of iwi and hapū in practice. Increased development may exclude Māori from meaningful participation in decision-making if space is allocated to others and cultural landscapes may be degraded through incremental encroachment. We highlight that any failure to protect Māori rights and interests in this space may constitute a breach of Te Tiriti o Waitangi.

Consultation is necessary, but without co-governance or shared decision-making structures, iwi and hapū may again be limited to reactive engagement rather than proactive partnership.

Recommendations

1. Reinstate strong "avoid" protections for biodiversity, natural character, and cultural landscapes;
2. Require explicit cultural impact assessment, particularly on wāhi tapu, kai gathering areas, tikanga Māori, and Treaty settlements, when priority activities are proposed;
3. Retain "functional need" test and limit use of "operational need" to prevent inappropriate development;
4. Ensure developments do not override Treaty settlements, customary marine title, or Māori governance aspirations;
5. Embed co-governance and shared decision-making with iwi and hapū in coastal and aquaculture planning;
6. Clarify how cultural, environmental, social, and economic benefits of aquaculture will be assessed and weighted with input from iwi and hapū;
7. Prioritise Māori led aquaculture, particularly in settlement space, through proactive zoning and implementation support;
8. Monitor and report on Māori participation, rights protection, and intergenerational wellbeing outcomes; and
9. Recognise mātauranga Māori and kaitiakitanga as valid and necessary sources of evidence and decision-making authority within coastal policy.

6.4 National Policy Statement for Highly Productive Land

Iarau support Land Use Classification (LUC) 3 protections under the National Policy Statement for Highly Productive Land (NPS-HPL) be removed from Māori owned whenua, where supported by their trusts and owners. Additionally, determination for other areas mapped as LUC 3 be made in partnership with iwi and hapū. This approach would recognise and uphold the tino rangatiratanga of mana whenua to determine appropriate land use based on their aspirations, values, and tikanga, rather than being constrained by a classification system.

While the removal of LUC 3 protections from the NPS-HPL more broadly presents both opportunities and risks, it is critical that whenua Māori is treated distinctly. Retaining LUC 3 restrictions on whenua Māori limits the ability of whānau, hapū and iwi to develop papakāinga, māra kai, or other culturally aligned uses that support wellbeing and align with their aspirations for their whenua.

Removing these restrictions on Māori owned land would enable development to be guided by iwi and hapū plans, customary practices, and the diverse needs of Māori communities, rather than centralised productivity frameworks. It would also mitigate the risk of council level planning decisions overriding mana whenua development rights, particularly where Māori land is situated on the rural–urban fringe.

Ultimately, this approach restores decision-making to iwi and hapū, supports intergenerational planning, and affirms Te Tiriti o Waitangi by enabling Māori to determine the future of their own lands without unnecessary external constraint.

Special Agricultural Areas

Iarau acknowledge the intent of Special Agricultural Areas (SAAs) to safeguard key horticultural zones, recognising the national importance of strategic food producing regions. However, from a Te Tiriti o Waitangi perspective, it is essential that any new regulatory framework for SAAs is co-designed with iwi and hapū to ensure Māori rights and interests are upheld.

SAAs must be identified and defined at the regional level to ensure iwi and hapū have meaningful input into their boundaries, governance, and the types of activities permitted within them. This approach acknowledges regional variation in whenua, whakapapa based relationships, and mātauranga Māori agricultural practices, and ensures local aspirations are reflected.

Without this regional approach, there is a risk that SAAs could entrench historical patterns of exclusion by limiting Māori land use and development options. Specific provision must be made to protect and enable papakāinga, māra kai, and kaupapa Māori food sovereignty initiatives. Further clarity is also needed on whether mātauranga Māori and whānau based practices will be recognised as legitimate forms of “primary production” within SAAs.

Mapping Criteria and Participation

Iarau support current mapping of Highly Productive Land (HPL) under the RMA being suspended, with timeframes extended to allow for a more enduring and culturally responsive approach to be developed through the replacement resource management system. Proceeding with mapping under the existing system risks locking in classifications that do not reflect Māori land use aspirations or tikanga based land management and doubling efforts to amend future versions of mapping.

Delaying the mapping process will provide time to engage meaningfully with iwi and hapū and ensure future frameworks incorporate co-governance arrangements, not just statutory consultation. Mapping decisions should recognise the unique whakapapa of whenua Māori and allow mana whenua to identify land of significance according to cultural, environmental, and intergenerational priorities, not solely LUC-based productivity criteria.

Suspension also allows for a more integrated transition, where mapping processes and protections under the new system can be designed from the outset to better uphold Te Tiriti o Waitangi, strengthen regional flexibility, and embed Māori values in land-use planning.

Treaty Considerations and Process Integrity

While the discussion document asserts there are no direct impacts on Treaty settlement mechanisms, this position overlooks the indirect consequences of changing land use frameworks on whenua Māori particularly if land use constraints shift unpredictably or without iwi and hapū consent. The emphasis on enabling private plan changes and accelerating greenfield development increases the risk that iwi and hapū voices are sidelined in the face of competing economic interests.

Consultation processes must be proactive and not merely procedural. Engagement with iwi, hapū, and PSGEs should explore not only the impacts on existing Treaty redress but also on the broader aspirations of whānau to reclaim and revitalise their whenua.

Recommendations

1. SAAs be regionally determined and co-designed in partnership with iwi and hapū, and that safeguards be built into the framework to support Māori led land use and cultural resilience;
2. Remove LUC 3 protections under the NPS-HPL from Māori-owned whenua where supported by landowners, to uphold tino rangatiratanga and enable culturally aligned land use;
3. Recognise whenua Māori as distinct from general land classifications, allowing iwi and hapū plans, tikanga, and customary practices to guide development rather than centralised productivity frameworks;

4. Suspend current HPL mapping under the RMA to avoid classifications that conflict with Māori aspirations and extend timeframes to enable co-designed and Treaty-consistent approaches; and
5. Engagement with iwi, hapū, and PSGEs must be proactive and partnership-based, addressing both Treaty redress and aspirations.

6.5 Multiple instruments for quarrying and mining provisions

While greater clarity and consistency in planning instruments may improve regulatory transparency, for iwi and hapū, the substance of the changes, particularly the increased permissiveness of resource extraction in sensitive environments, raises significant cultural and environmental concerns. Quarrying and mining often impact taonga species, wāhi tapu, and ancestral lands, including wetlands and kai gathering sites, which hold cultural, spiritual, and economic significance to Māori. Enabling more extractive projects through looser gateway tests and broader benefit definitions increases the potential for environmental degradation and the erosion of kaitiakitanga if not balanced with strong Māori engagement and safeguards.

Notably, the proposed removal of:

- The requirement that benefits be "public";
- the test that benefits "could not otherwise be achieved using resources in New Zealand", represents a lowering of the threshold for consent approval. This change may;
- Weaken environmental protections by placing economic considerations above ecological and cultural ones; and
- Undermine Māori environmental values, especially if development is approved in areas where Māori seek to exercise kaitiakitanga or protect sites of significance.

Additionally, the addition of "operational need" as a gateway test (alongside "functional need") further widens the scope for justifying quarrying and mining, which could reduce iwi and hapū influence over whether and where such activities are permitted, particularly in Significant Natural Areas (SNA's) and on Highly Productive Land that overlaps with Māori landholdings.

The discussion document asserts that the proposals will not affect Treaty settlement mechanisms or statutory acknowledgements yet fails to proactively affirm Te Tiriti o Waitangi principles in the framing of new provisions. In particular, the emphasis is on consent authorities having "regard" to Māori interests, without any requirement for co-design or co-governance of extraction-related decisions. There is no assurance that iwi and hapū worldviews and mātauranga Māori will be recognised in assessing the effects of extractive proposals and there is no explicit mention of prior, and informed consent for activities impacting Māori land or taonga. These omissions are concerning, given the

historical exclusion of Māori from decision-making in environmental management and the disproportionate impacts of extractive industries on iwi and hapū in Aotearoa.

While the intention to simplify and align planning instruments is administratively valid, for iwi and hapū the proposed changes may erode cultural protections, increase pressure on whenua Māori, and prioritise economic objectives over tino rangatiratanga and kaitiakitanga. A more balanced, Te Tiriti consistent approach would require co-design of quarrying and mining provisions with iwi and hapū, retaining high thresholds for impacting SNAs and wetlands, and embedding Te Ao Māori environmental perspectives into the heart of decision making.

Recommendations

1. Stronger safeguards informed by iwi and hapū must be embedded in the consent pathways to protect culturally significant areas and uphold tino rangatiratanga;
2. Mātauranga Māori and cultural effects assessments should be mandated components of consent decisions in SNAs, wetlands, and HPL areas;
3. Gateway tests should retain references to public benefits and resource scarcity to prevent exploitation justified by private or marginal gains;
4. A requirement for early and meaningful consultation with iwi and hapū must be formalised in all four instruments, not left to consent authority discretion; and
5. Consideration should be given to excluding Māori land from expanded consent pathways, or at minimum, applying a separate consenting framework that respects Treaty settlements and cultural values.

6.6 Stock Exclusion Regulations

The proposed amendment to Regulation 17 of the Resource Management Stock Exclusion Regulations 2020 would remove the requirement to exclude non-intensively grazed beef cattle and deer from natural wetlands that support populations of threatened species. This marks a significant shift from a protective to a permissive regime, particularly for extensive farming systems.

This proposed change raises serious concerns. Wetlands are culturally and ecologically significant ecosystems, often intrinsically connected to mahinga kai, wāhi tapu, taonga species, and the broader exercise of kaitiakitanga. Many threatened species, including native birds, fish, and plants that inhabit or depend on wetlands, are considered taonga by iwi and hapū and hold deep cultural importance. Removing blanket protections from these areas risks significant degradation, including damage from trampling, nutrient runoff, and disturbance, even where farming activities are classified as "non-intensive."

Although the proposed changes increase flexibility and cost-effectiveness for landowners, it risks removing necessary environmental safeguards, particularly given the

historical degradation of wetlands and freshwater resources, much of which has disproportionately impacted Māori.

Limited acknowledgement of cultural impacts and treaty obligations
While the proposal acknowledges that some of the affected threatened species may be taonga to Māori, it defers protective responsibilities to local authorities and tangata whenua through freshwater planning processes.

This raises several issues, particularly the shift of responsibility away from central government regulation toward localised responses may place additional burden on iwi and hapū to constantly advocate for site-specific protections, a resource-intensive and inequitable expectation. The assertion that tangata whenua *"could work with local authorities"* to apply stricter plan rules underplays the power imbalance, inconsistent council practices, and consultation fatigue already experienced by many iwi and hapū groups in resource management processes.

Furthermore, the reference to the Wai 2358 Stage 2 Inquiry (which highlighted the Crown's prior failure to regulate stock exclusion and its contribution to freshwater degradation) is particularly poignant. This proposal, in effect, reverses some of the gains made in response to those Te Tiriti based concerns, especially in the protection of taonga species and particular sites.

Lack of safeguards for Māori interests and Freshwater Quality
It is highlighted that the proposed changes will mostly affect private farmland, with some exceptions on Crown land (e.g., Taieri Scroll Plains). However, no mechanisms are proposed to ensure meaningful iwi and hapū engagement in monitoring or safeguarding vulnerable wetlands, whether on Crown or private land.

Iarau is concerned that the cumulative impacts on wetland health may not be adequately captured or managed at the national level under the proposed changes. There is currently no requirement for monitoring, cultural impact assessments, or even notification to iwi where taonga species or wetlands of significance are present. Furthermore, the framing of these changes as a matter of "balancing Māori rights and private agricultural interests" risks reducing the principles of Te Tiriti o Waitangi to a set of competing stakeholder views, rather than upholding Te Tiriti as the foundation of a constitutional partnership.

Summary of key points
While the intent to reduce regulatory burden for extensive farming is clear, this proposal undermines national-level protections for threatened freshwater ecosystems, many of which are integral to the identity, health, and wellbeing of Māori communities.
Iarau oppose the removal of stock exclusion for wetlands with threatened species, especially without guarantees of alternative protections and request mandatory iwi consultation and cultural impact assessments in any changes that could affect wetlands

or taonga species. We also seek a co-governance approach to freshwater and wetland management that embeds mana whakahaere and recognises the Crown's Te Tiriti obligations and demand that national protections are retained, rather than relying on under-resourced iwi to advocate at the regional level.

7.0 IMPLEMENTATION

Iarau recommend:

1. Establishing clear and enforceable implementation timeframes with measurable milestones, and require that resourcing be specifically allocated to enable equitable Māori participation in both plan-making and resource consent processes;
2. Mandating the co-design of national guidance documents with iwi, hapū, and PSGEs, ensuring that mātauranga Māori, tikanga, and iwi/hapū values are embedded from the outset, to improve intent and implementation;
3. Requiring councils and relevant agencies to publicly report on how they are actively giving effect to Te Tiriti o Waitangi, including the principles of partnership, protection, and participation, as part of implementation monitoring and evaluation;
4. Guaranteeing dedicated, long-term funding for iwi, hapū, and PSGEs to participate meaningfully in planning, policy development, consenting, monitoring, and implementation activities - this must extend beyond consultation phases to include governance and decision-making;
5. Ensuring that national direction explicitly upholds all existing Treaty settlements, statutory acknowledgements, and joint management agreements; and
6. Implementation be grounded in the principle of mana ōrite, not simply consultation, ensuring iwi and hapū lead decision-making alongside the Crown.

8.0 CONCLUSION

Iarau acknowledges the critical need for improved infrastructure, housing, and primary sector frameworks to respond to climate, housing, and environmental pressures. However, this must not come at the expense of Māori rights, interests, and the taiao.

We have consistently raised the following concerns across the proposals:

- The cumulative impact of fragmented, large-scale reforms without consolidated analysis or adequate engagement risks undermining Māori rights and protections;
- There is insufficient recognition of Te Tiriti o Waitangi as a constitutional foundation, with proposals often reducing Māori interests to matters of engagement rather than shared authority;
- Environmental and cultural safeguards are being deprioritised in favour of "efficiency" and "streamlining," creating a permissive regulatory environment that will disproportionately impact Māori communities and landscapes; and

- The burden of implementation is being shifted onto under-resourced iwi, hapū, and Māori landowners without corresponding support or structural partnership.

In addition to our recommendations on each of the proposals, we urge the Crown to:

- Pause the rollout of the proposed changes and re-align these packages with the comprehensive reform of the resource management system;
- Co-design a new engagement framework with iwi and hapū that reflects the principles of Te Tiriti o Waitangi and centres Māori decision-making authority;
- Protect existing Treaty settlements and enable more consistent recognition of mātauranga Māori, customary rights, and mana whakahaere across all domains;
- Restore and strengthen environmental safeguards, particularly in relation to freshwater, wāhi tapu, wāhi tūpuna, coastal and marine areas, and whenua Māori;
- Resource active Māori participation in all planning, consenting, implementation, and monitoring processes across national direction instruments; and
- Elevate Māori spatial, environmental, energy, and housing strategies within national and regional frameworks, ensuring they carry equal statutory weight.

Iarau remains committed to supporting reform that is strategic, equitable, and based on the principles of Te Tiriti o Waitangi. We call on the Crown to uphold its obligations and work with mana whenua to co-design a future where Māori aspirations, the taiao, and intergenerational wellbeing are the foundation of national direction.