



25 July 2025

Ministry for the Environment  
PO Box 10362  
Wellington 6143  
New Zealand

Attention: Hon Chris Bishop, Minister Responsible for RMA Reform

Tēnā koe e te Minita Bishop,

## **PARININIHI KI WAITŌTARA INCORPORATION: FEEDBACK TO UPDATING RMA NATIONAL DIRECTION**

### **History of Parininihi ki Waitōtara**

1. Parininihi ki Waitōtara Incorporation (**Parininihi ki Waitōtara** or **PKW**) represents the interests of over 11,000 Rau Titikura (shareholders), predominantly of ngā iwi o Taranaki descent, who maintain a profound and enduring relationship and culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga. Despite the devastating effects of the muru me te raupatu – the confiscation and plundering – of whenua (land) in Taranaki and legislative frameworks that have provided inadequate or harmful interpretations of Taranaki Māori land and property rights and entitlements, PKW has consistently demonstrated significant contributions to the social, cultural, and economic well-being of our people and the well-being of our environment.

### **Successful Māori business**

2. Parininihi ki Waitōtara is driven by the vision '*He Tangata, He Whenua, He Oranga*' – sustaining and growing our people through prosperity, with a mission '*to be a successfully diversified and sustainable Taranaki Māori owned and operated business providing meaningful opportunity to our people*'<sup>1</sup>. An ambitious strategy sees Parininihi ki Waitōtara have operating and business interests that include bovine and ovine dairy, horticulture and forestry, as well as Kōura fisheries and commercial property. We are the custodians of 20,000ha of whenua in a mixture of ownership arrangements and land tenure types.
3. With commitments in a range of industries and as a successful intergenerational Māori business, including being the largest farmer in Taranaki and largest Taranaki-based milk supplier to Fonterra, PKW express our disappointment in not being meaningfully engaged by the Ministry for the Environment to inform the amendments to the Resource Management Act 1991 (RMA) national direction. We have Te Tiriti o Waitangi/ Treaty of Waitangi (**Te Tiriti**) rights and interests, whenua and property rights and entitlements and combining all of this with our history, Parininihi ki

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<sup>1</sup> Parininihi ki Waitōtara (2025). *He Tangata*, <https://pkw.co.nz/he-tangata/#mission-and-vision>

Waitōtara hold mātauranga that the Ministry for the Environment would have benefitted from in early and meaningful engagement and consultation on these matters; we are left to provide advice through ineffective and inefficient submission processes that have historically given little weight to advice received from Māori.

#### **Parininihi ki Waitōtara Kaitiakitanga Strategy**

4. The Parininihi ki Waitōtara Kaitiakitanga Strategy (2018) (**Kaitiakitanga Strategy**)<sup>2</sup> is one of the key environmental documents guiding PKW in its operations and in striving to achieve high standards of environmental performance. It provides a focused operational framework of projects, providing PKW with guidance as kaitiaki of our whenua. The Kaitiakitanga Strategy takes a strategic, proactive approach in dealing with environmental issues and concerns, collaborating with hapū where we are able to and enabling Taranaki Māori to connect with their ancestral whenua – all undertaken with tikanga Māori at its heart.
5. The Kaitiakitanga Strategy was developed as a result of kōrero with PKW whānau and commits PKW to a range of kaupapa and activities that are all deeply intertwined in the business operations. The Kaitiakitanga Strategy strives for high standards of environmental performance, restoration and protection of the environment to be achieved – all key attributes of kaitiakitanga – aspects of stewardship as well. The five kaupapa being<sup>3</sup>:
  - a. Wai Māori: Freshwater
  - b. Kanorau Koiora: Biodiversity
  - c. Tūhononga: Reconnection
  - d. Te Kōkiritanga: Leadership and Advocacy
  - e. Tukanga o te Mahi Pāmu: Farming Methods
6. A sixth kaupapa, Te Huri o te Āhuarangi: Climate Change Resilience Plan, was incorporated into the Kaitiakitanga Strategy in 2021.

#### **Parininihi ki Waitōtara feedback format**

7. Parininihi ki Waitōtara have reviewed the Ministry for the Environment (MFE) Packages 1 – 3 Discussion Documents and appendices in order to provide feedback. This feedback does not explicitly respond to each discussion document pātai, though it does provide kōrero and lived examples in response to each kaupapa in the respective package. We reiterate our disappointment in the lack of engagement with PKW to inform the proposals and we welcome further kōrero with Ministry for the Environment kaimahi following receipt of this feedback, including hui and site visits.

#### **Package 1: Infrastructure and Development**

##### *National Policy Statement for Infrastructure (NPS-I)*

8. Parininihi ki Waitōtara acknowledge that national policy direction with respect to infrastructure may improve certainty and better enable infrastructure development; however, this cannot be at the further detriment to the health and well-being of the natural and physical environment, including the further erosion of Māori property rights and Te Tiriti rights and interests in whenua. Good planning processes, including spatial and strategic planning will assist also in improving certainty, this includes effective and meaningful engagement with tangata whenua/Māori.
9. The NPS-I must apply to both existing and proposed, publicly and privately developed infrastructure. Poor infrastructure planning decisions of the past must not impact on current and future generations and the well-being of the environment. A recent example of why it is

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<sup>2</sup> Parininihi ki Waitōtara (2025). He Whenua, <https://pkw.co.nz/he-whenua/>

<sup>3</sup> Detailed at Appendix A

appropriate that the NPS-I should apply to all infrastructure providers and at all times, was the impacts of a significant wet weather event in South Taranaki in July 2025 resulted in continuous effluent overflow from the Eltham Wastewater Treatment Plant 'overflow pond' to the Mangawhero Stream. Unfortunately the 'overflow pond's riverside bank' (it was constructed on the true righthand bank of the Mangawhero Stream), collapsed due to high water levels and resultant erosion<sup>4</sup>. With other industries being encouraged to and committing to improving environmental performance standards, such as the farming industry, there is an expectation that infrastructure providers will improve the quality and standards of their infrastructure. The health and well-being, the mana of our awa can no longer continue to sustain these impacts, our awa can no longer continue to be utilised as 'infrastructure'; better quality infrastructure planning and infrastructure is required.

10. PKW remain concerned regarding the use of the '*functional need or operational need*' tests for infrastructure. These tests must uphold and maintain high thresholds to ensure the construction, maintenance and operation of infrastructure is not at the detriment to the natural and physical environment, Māori property rights and Te Tiriti rights and interests.
11. PKW support in principle the provision of a policy ensuring the recognition and provision of Māori interests in infrastructure; however, this policy must directly speak to the objective of the NPS-I, it fails to do this as proposed. In addition, the policy wording requires strengthening – '*(a) taking into account the outcome of engagement..*' is inappropriate. The objective and policy must ensure acknowledgement of the benefits of the expert advice and mātauranga Māori of tangata whenua/ Māori to inform infrastructure development.
12. Taranaki Māori have, for many years, experienced issues with redundant and decommissioned infrastructure. To ensure the prosperity of future generations and their well-being, PKW consider it appropriate that the NPS-I ensures that infrastructure lifecycles, including restoration and decommissioning plans, are considered in policy direction and strategic infrastructure planning.

*National Policy Statement for Renewable Electricity Generation (NPS-REG)*

13. Parininihi ki Waitōtara acknowledges, through our Kaitiakitanga Strategy, the impacts of climate change, with aspirations to be carbon neutral, achieved through Te Huri o Te Āhuarangi<sup>5</sup> in collaboration with diversifying land uses. This diversification includes alternative and mixed-land uses, as well as renewable electricity projects. Parininihi ki Waitōtara are generally supportive of amendments to objectives and policies that will strengthen emissions reduction; however, this cannot be at the further detriment to the health and well-being of the natural and physical environment, including Māori property rights and Te Tiriti rights and interests.
14. PKW support in principle the provision of a policy ensuring the recognition and provision of Māori interests in renewable electricity; however, this policy must directly speak to the objective of the NPS-REG, it fails to do this as proposed. In addition, the policy wording requires strengthening – '*(a) taking in to account the outcome of engagement..*' is inappropriate. The objective and policy must ensure acknowledgement of the benefits of the expert advice and mātauranga Māori of tangata whenua/ Māori to inform renewable electricity.
15. Through engagement with mana whenua on proposed renewable electricity projects in Taranaki, PKW understand there are significant concerns regarding the renewable electricity infrastructure lifecycles. To ensure the prosperity of future generations and their well-being, PKW consider it

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<sup>4</sup> South Taranaki District Council (2025), *Wastewater overflow at Eltham Wastewater Treatment Plant*, 8 July 2025, <https://www.southtaranaki.com/our-council/news?item=id:2urbi1dki17q9s3lg7vb>

<sup>5</sup> Climate Change Resiliency Plan

appropriate that the NPS-REG ensures that the renewable electricity infrastructure lifecycles, including restoration and decommissioning plans, are considered in policy direction.

*National Policy Statement for Electricity Networks (NPS-EN)*

16. PKW remain concerned regarding the use of the *'functional need or operational need'* tests for electricity networks. These tests must uphold and maintain high thresholds to ensure the construction, maintenance and operation of electricity networks is not at the detriment to the natural and physical environment and the further erosion of Māori property rights and Te Tiriti rights and interests. Good, collaborative planning processes, including effective and meaningful engagement with tangata whenua/ Māori and spatial and strategic planning, will ensure a high threshold is maintained.
17. PKW support in principle the provision of a policy ensuring the recognition and provision of Māori interests in electricity networks; however, this policy must directly speak to the objective of the NPS-EN, it fails to do this as proposed. In addition, the policy wording requires strengthening – *'(a) taking in to account the outcome of engagement..'* is inappropriate. The objective and policy must ensure the acknowledgement of the benefits of the expert advice and mātauranga Māori of tangata whenua/ Māori to inform electricity networks.

*National Environmental Standards for Granny Flats (Minor Residential Units) (NES-GF)*

18. The housing demands for Taranaki Māori is well understood by Parininihi ki Waitōtara. This understanding has been informed by mahi undertaken by Ka Uruora<sup>6</sup>. Ka Uruora is an iwi-led response to address some of the housing demands across different parts of the motu, including in Taranaki. PKW are supportive in principle of the NES-GF and the housing needs it will assist in addressing, including for Māori who live multi-generationally; however, this must not be at the detriment to the health and well-being of the natural and physical environment, the relationship of Māori and their culture and traditions with their ancestral lands, wāhi tapu, wai and other taonga, Māori property rights and Te Tiriti interests and rights.

*National Environmental Standards for Papakāinga (NES-P)*

19. The Parininihi ki Waitōtara Kaitiakitanga Strategy acknowledges *'The whakapapa connection between Taranaki whanau and their lands, and the impact of raupatu on that connection has been intertwined in every conversation. A central theme was a strong desire to create opportunities to reconnect, to enable a greater engagement on decision making and collaborative projects that could be delivered by whanau to reinforce and encourage the transfer of knowledge on PKW whenua'*. An aspect of connection, and re-connection, is to provide kāinga on ancestral whenua – PKW have strategic aspirations to enable kāinga for Taranaki Māori on ancestral whenua.
20. Parininihi ki Waitōtara have more recently participated as a submitter in the South Taranaki District Council's Plan Change 3: Papakāinga<sup>7</sup>. In summary, the Hearing Panel Decision for Plan Change 3 now provides for a permissible and enabling rule framework for Papakāinga on ancestral whenua, irrelevant of land tenure i.e. not only restricted to Māori land, permissible on general title land as well. This is appropriate in the context of PKW given our mixture of land holdings and in South Taranaki given the on-going impacts of te muru me te raupatu.
21. The proposed NES-P, in many aspects, is more stringent than the recent Plan Change 3 decision. Parininihi ki Waitōtara support the ability of district plan rules for papakāinga being more lenient or more enabling than the NES-P. Any NES-P must ensure that local context, particularly the

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<sup>6</sup> Ka Uruora (2025), <https://kauruora.nz>

<sup>7</sup> South Taranaki District Council (2025), <https://www.southtaranaki.com/our-council/plans-strategies-and-reports/district-plan/plan-change-3>

relationship of Māori to their ancestral whenua, can be recognised and provided for, in addition to Māori property rights and Te Tiriti rights and interests.

*National Policy Statement for Natural Hazards (NPS-NH)*

22. Parininihi ki Waitōtara acknowledge the need for national direction with regard to Natural Hazards, notably with the increase in the severity of these events and the climate change implications. However, we remain concerned that any direction in relation to Natural Hazards could limit the use of whenua Māori, including the further erosion of Māori property rights and Te Tiriti rights and interests in whenua. It is therefore necessary that the expert advice of tangata whenua/ Māori must be engaged to inform local policy direction in relation to natural hazards.
23. It is noted that volcanic hazards are not listed in the seven identified hazards that local authorities must consider<sup>8</sup>, the proposed NPS-NH provides the discretion to consider other hazards. With respect to the Taranaki region, Te Ture Whakatupua mō Te Kāhui Tupua 2025/ Taranaki Maunga Collective Redress Act 2025<sup>9</sup> was promulgated in February 2025. It is well understood that Taranaki Maunga will suffer volcanic unrest in the future. PKW consider it is appropriate that this settlement legislation be utilised, in conjunction with engaging the expert advice of tangata whenua/ Māori, to inform direction in relation to managing risks from volcanic hazard in the Taranaki region.

**Package 2: Primary sector**

*National Environmental Standards for Commercial Forestry (NES-CS)*

24. Parininihi ki Waitōtara has commercial forestry business interests and has worked closely with our operators to continuously improve environmental performance, particularly in relation to ecological restoration, afforestation and slash. Demanding high standards of quality environmental performance ensures PKW protects, cares for and restores the mauri of wai Māori (freshwater) which flows through and adjacent to the forestry blocks, in accordance with the Kaitiakitanga Strategy<sup>10</sup>.
25. In principle, PKW support proposed amendments to the NES-CS that would provide clarity and certainty on the regulations; however, these changes must ensure forestry owners and commercial operators continue to be innovative and utilise evolving technology to ensure continuous improvements in environmental performance – these changes cannot be at the detriment to the health and well-being of the natural and physical environment, the erosion of the relationship of Māori and our culture and traditions with our ancestral lands, Māori property rights and the Te Tiriti rights and interests of Māori.

*New Zealand Coastal Policy Statement (NZCPS)*

26. As with some of the proposed wording and wording amendments to the National Policy Statements (NPS) described in Package 1, PKW remain concerned regarding the use of the *'functional need or operational need'* tests for activities and development in the coastal marine area. These tests must uphold and maintain high thresholds to ensure the location of activities in the coastal marine area is not at the detriment to the natural and physical environment, Māori

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<sup>8</sup> Ministry for the Environment (2025), Discussion Document, Package 1: Infrastructure and Development, <https://environment.govt.nz/assets/publications/RMA/package-1-infrastructure-and-development-discussion-document.pdf> (page 67)

<sup>9</sup> Te Ture Whakatupua mō Te Kāhui Tupua 2025/Taranaki Maunga Collective Redress Act 2025, <https://www.legislation.govt.nz/act/public/2025/0001/latest/LMS899476.html>

<sup>10</sup> The whāinga (goals) and mahinga (work/ projects) for the Wai Māori kaupapa from the Kaitiakitanga Strategy are attached at Appendix A

property rights and any Te Tiriti rights and interests<sup>11</sup>. Good, collaborative planning processes, including effective and meaningful engagement with tangata whenua/Māori and spatial and strategic planning, will ensure a high threshold is maintained.

*National Policy Statement for Highly Productive Land (NPS-HPL)*

27. PKW understands the key objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, now and for future generations. The majority of the 20,000ha of Parininihi ki Waitōtara whenua holding in Taranaki is located within the rural area with land classified predominantly LUC 1, LUC 2 and LUC 3. For this reason, PKW's core business has mostly been in the agriculture space. Notwithstanding this, we are currently exploring mixed use, alternative and diverse land uses that complement existing and successful farming operations.
28. Parininihi ki Waitōtara are committed to retaining ownership of whenua in perpetuity, to ensure the on-going benefits for current and future generations/ Rau Titikura. PKW do not have a particular view on the removal of land classified LUC 3 being removed from the NPS-HPL restrictions, noting our responsibility to our Rau Titikura/ Taranaki Māori, our current successful farming operations, our commitment to diversification of land uses, our Māori property rights and our Te Tiriti rights and interests.

*Multiple instruments for quarrying and mining provisions*

29. Parininihi ki Waitōtara do not support quarrying and mining on our whenua. Whilst we acknowledge there may be benefits in providing consistency and alignment in consent processes and terminology throughout the national direction documents<sup>12</sup>, the kaupapa and objective of each national direction document is different and therefore differences in processes should be expected.

*Resource Management (Stock Exclusion) Regulations 2020 (Stock Exclusion Regulations)*

30. The proposal seeks to amend Regulation 17 of the Stock Exclusion Regulations to remove the requirement to exclude non-intensively grazed beef cattle and deer from natural wetlands that support a population of threatened species. Parininihi ki Waitōtara understands that the Government are seeking to remove rules where the benefits may not outweigh the costs to the primary sector, particularly where there is a lack of flexibility and adaptability to individual circumstances.
31. Parininihi ki Waitōtara, through our Kaitiakitanga Strategy, set an ambitious 15 year target in 2019 to fence all riparian planting, waterways and wetlands across our whenua, in combination with environmental farm plans and wai monitoring. This has been successfully implemented and ensures the protection and enhancement of Kanorau Koiora: Biodiversity (taonga species, including any threatened species are able to thrive) and Wai Māori: Water (the mauri of wai is protected, cared for and restored)<sup>13</sup>. Kaitiakitanga is intergenerational and multigenerational, it ensures the protection of the environment for current and future generations.
32. For these reasons, PKW oppose the outright removal of stock exclusion from Regulation 17 and seek that some flexibility in meeting stock exclusion timeframes is provided for in circumstances where it is required, for example non-intensively grazed areas along the West Coast and in the

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<sup>11</sup> PKW strongly support the retention of Objective 3 and Policy 2 of the NZCPS in relation to the Treaty of Waitangi, tangata whenua and Māori.

<sup>12</sup> Notably the NPSIB, NPS-HPL, NPS-FM and NES-F

<sup>13</sup> The whāinga (goals) and mahinga (work/ projects) for the Kanorau Koiora and Wai Māori kaupapa from the Kaitiakitanga Strategy are attached at Appendix A

South Island High Country<sup>14</sup>. The identified taonga species have a threatened status as a result of multiple causes, including poor farming practices and inappropriate land uses and once those species are extinct, they are extinct. The Stock Exclusion Regulations must maintain regulations that ensure high standards of compliance and protection for the environment where it is demanded – in this instance, the protection of threatened species. It seems counterintuitive that good operators committed to high standards and continuous improvements in environmental performance, such as the protection of threatened species, will have to carry the lack of commitment and poor environmental performance of other operators in the industry, in addition to poor land use choices in particular environments.

### Package 3: Freshwater

33. As mentioned earlier, Parininihi ki Waitōtara as a Māori business, has a long and complex history as a result of the muru me te raupatu. For many years, PKW's core business has been intensive, but integrated, farming. The Kaitiakitanga Strategy acknowledges '*.. the impacts of a broad range of land uses [by PKW], including intensive dairying has created a perceived and real decline in water quantity, quality and more importantly for tangata whenua, a negative impact on te mauri o te wai*'. It goes on to state '*.. as a Māori business, owned by its people, the expectations [in terms of environmental performance] would seem higher [than non-Māori]*'. The Kaitiakitanga Strategy focused on an initial five year period and then the next 15 years; some of the top priorities have been a commitment to improving farming methods, to directly improve the health and wellbeing of the natural and physical environment, including wai Māori, biodiversity and the connection of tangata whenua to their ancestral lands.
34. The Kaitiakitanga Strategy identifies a range of goals and projects for the kaupapa of Wai Māori, Kanorau Koiora (Biodiversity) and Tukanga o te Mahi Pāmu (Farming Methods), in conjunction with Tūhononga (Connection) and Te Kōkiritanga (Leadership and Advocacy)<sup>15</sup>. Some of the key whāinga (goals) for PKW within these kaupapa to ensure PKW's overarching vision, *He Tangata, He Whenua, He Oranga* is achieved:
- a. PKW understands the state of the mauri [of wai Māori and Kanorau Koiora] and continuously monitors.
  - b. The mauri of Wai Māori within PKW will be protected, cared for and restored.
  - c. PKW efficiently uses only the water we need and that there is enough water for the awa (waterways).
  - d. PKW is actively protecting the mauri of waterways.
  - e. PKW will support rehabilitation of habitat for the most threatened species.
  - f. PKW is actively protecting the habitat of Taonga Species.
  - g. PKW will identify lands available for alternative land uses.
  - h. PKW is actively protecting the mauri of the Taiao.
  - i. PKW has a strategic and holistic approach to farming detailed in agreed [Farm Environmental Management] plans.
35. Some of the mahinga (work) to achieve these whāinga, include:
- a. A cultural health monitoring regime will be established for all waterways and biodiversity.
  - b. Water assessments complete identifying long term efficiencies that can be made for use.
  - c. All waterways, including those not required under compliance, are fenced.
  - d. All waterways have two metre native riparian strips.
  - e. Farm management plans are commissioned and lodged with Council.

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<sup>14</sup> As identified in the Ministry for the Environment (2025), Discussion Document, Package 2: Primary Sector, <https://environment.govt.nz/assets/publications/RMA/package-2-primary-sector-discussion-document.pdf>

<sup>15</sup> The whāinga (goals) and mahinga (work/ projects) for the Kanorau Koiora, Wai Māori, Tukanga o te Mahi Pāmu, Tūhononga and Te Kōkiritanga kaupapa from the Kaitiakitanga Strategy are attached at Appendix A

36. These activities/ mahi are done in conjunction with mana whenua, enabling access and connection for whānau to their ancestral lands, whilst embracing te reo Māori and tikanga Māori.
37. PKW have established an extensive and comprehensive cultural health monitoring programme for waterways and biodiversity across PKW whenua. These monitoring programmes include an assessment against Te Ihoiho Whakakite – Mouri Engagement Framework which assesses the mouri<sup>16</sup> of the wai and biodiversity against three pou:
  - a. Te Iho Tangata – The connection each person has with their own mouri through karakia.
  - b. Te Iho Whenua – Protection of awa and surrounding riparian zones, whakapapa kōrero that aligns with the social-historical kōrero and the mātauranga pūtaiao/ scientific knowledge (utilising Stream Health Monitoring Assessment Kit (SHMAK) tests).
  - c. Te Iho Rangi – Attributes of the taiao, including the weather and the maramataka, for example.
38. The cultural health monitoring is undertaken across PKW’s whenua and an overall report prepared twice a year. The report calculates an overall score from the framework assessments and actions are recommended. This ensures Wai Māori and biodiversity mauri are continuously enhanced, coupled with ensuring the on-going connection of tangata whenua to their ancestral lands, continuous improvements and enhancements in farming methods and practices and consideration of alternative land uses.
39. Given the above, Parininihi ki Waitōtara consider we are currently giving effect to the objective of Te Mana o te Wai and at no time has this compromised our on-farm mahi and operations, it has only enhanced it. Over many years, substantial mahi has been undertaken to ensure the organisation continues to achieve high standards of environmental performance and the key whāinga of protection, manaakitanga and restoration of the mauri of Wai Māori and Biodiversity within PKW whenua. This is an active, lived experience of kaitiakitanga, that will ensure the whenua and its opportunities, continue to provide for current and future generations in a sustainable manner.

*Rebalancing freshwater management through multiple objectives*

40. Parininihi ki Waitōtara support the existing National Policy Statement for Freshwater Management (NPS-FM) sole objective. PKW have evidenced that the hierarchy of obligations with respect to Wai Māori, can be achieved. The provision of additional objectives<sup>17</sup> would contribute no additional value to the NPS-FM and its implementation, given it is covered by the sole objective, the hierarchy of obligations and used in combination with the existing mechanisms and tools provided for in the current NPS-FM<sup>18</sup>.
41. The Package 3 Discussion Document correctly states the NPS-FM has often been mis-interpreted as requiring Te Mana o te Wai to be achieved immediately. The document goes on to suggest ‘*However, the NPS-FM has never specified a timeframe by which targets and limits must be met*’. PKW disagree with this suggestion and are of the view that the NPS-FM is clear in terms of the timeframes, noting that improvements and enhancements may take multiple generations. It would be difficult to place a ‘timeframe’ on the improvements/ enhancements/ achieving Te

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<sup>16</sup> A dialectual difference in spelling with the kupu (word) ‘Mauri’

<sup>17</sup> Ministry for the Environment (2025), Discussion Document, Package 3: Freshwater, <https://environment.govt.nz/assets/publications/RMA/package-3-freshwater-discussion-document.pdf> (page 13)

<sup>18</sup> including the communities’ long-term goals/ visions for freshwater, integrated management approaches and the National Objectives Framework (NOF), for example.

Mana o te Wai, as the baseline mauri/ mana/ health data of awa across the motu (country) will vary.

#### *Rebalancing Te Mana o te Wai*

42. Parininihi ki Waitōtara are opposed to any change to or rebalancing of Te Mana o te Wai in the NPS-FM. As described previously in this feedback, PKW are continuing to implement mahi that will span multiple generations, that will ensure Te Mana o te Wai will continuously be enhanced. Rebalancing Te Mana o te Wai would be detrimental to the natural and physical environment. The proposal would see good operators committed to high standards and continuous improvements and enhancements in environmental performance, having to carry those operators and land users with a lack of commitment to continuous improvements in operations and poor environmental performance. Te Mana o te Wai will uphold all users of freshwater to high standards of environmental performance and the protection and restoration of freshwater for current and future generations.

#### *Providing flexibility in the National Objectives Framework*

43. Parininihi ki Waitōtara consider there is existing flexibility in the current National Objectives Framework (NOF). We support Mahinga Kai as a compulsory national value, with the flexibility to consider the optional freshwater values, this aligns with the kaupapa and whāinga of the Kaitiakitanga Strategy. PKW acknowledge there may be instances where attributes may not be relevant to particular catchments, we would be open to providing some flexibility in the measurable characteristics only where there are natural or physical characteristics of an awa that require that flexibility, for example awa with high sediment load due to soil conditions. 'Flexibility' is not considered to be a reason to not address the poor practices of land users adjoining freshwater.

#### *Enabling commercial vegetable growing*

44. Parininihi ki Waitōtara, as part of the strategic commitment to land uses diversification, are currently exploring vegetable growing opportunities across our whenua, including kūmara and garlic<sup>19</sup>. PKW acknowledge the desire to potentially enable vegetable growing as a permitted activity; however, we are concerned that a permitted activity status would likely result in tangata whenua/ Māori being excluded from statutory processes to inform any commercial vegetable growing activities. Whilst there may be benefits in nationally set standards for commercial vegetable growing, this must also benefit from the local context, including the expert advice/ mātauranga of tangata whenua/ Māori.

#### *Addressing water security and water storage*

45. PKW understands the needs for addressing water security and water storage, noting our Kaitiakitanga Strategy requires the effective use of water, including that enough water remains in the awa. We remain concerned additional water takes from awa would have impacts on the health and wellbeing of the awa, including Te Mana o Te Wai. This is why PKW consider the hierarchy of obligations must be retained in the NPS-FM. PKW are of the view that it would be more appropriate to consider land use types, the need for water and the efficient uses of water, in accordance with Te Mana o te Wai.

#### *Simplifying the wetlands provisions*

46. Parininihi ki Waitōtara are opposed to the simplification of the wetland provisions. The current NES-F provides pathways for the activities described in the Package 3 Discussion Document, including 'farming activities'. PKW remain concerned that the good operators committed to high

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<sup>19</sup> Garlic through the Te Puna Umanga Venture Taranaki Branching Out Programme, <https://www.venture.org.nz/sector-development/food/branching-out/>

standards and continuous improvements in environmental performance, who are protecting wetlands and their species because of their intimate knowledge of the whenua, will be left to carry the lack of commitment and poor environmental performance of other operators, if high standards in relation to wetlands are not upheld.

#### *Simplifying the fish passage regulations*

47. Parininihi ki Waitōtara are opposed to the simplification of the fish passage regulations. We would consider some flexibility in the information requirements to be supplied to local authorities; however, the regulations should note that additional information may be requested, when considering the local context. Further to this, 'flexibility' is not considered to be a reason to not address the poor fish passage.

#### *Addressing remaining issues with farmer-facing regulations (National Environmental Standards for Freshwater (NES-F))*

48. As described in our Kaitiakitanga Strategy, Parininihi ki Waitōtara are continuously reviewing and improving on-farm practices and procedures to ensure our farming operations have the least impact on the taiao. We aspire to move to and consider alternative farming methods to support the Kaitiakitanga Strategy requirements and aspirations of our whānau.
49. Parininihi ki Waitōtara do currently use synthetic nitrogen fertilisers. We have a strong relationship with our provider and all nutrient application to whenua is logged in a database and tracked via GPS as to when and where and therefore, we have no issues with the timing for reporting of multiple matters at a variety of times throughout the year. In terms of reporting, the database and GPS tracking enables Parininihi ki Waitōtara to record all nutrient applications. Parininihi ki Waitōtara are concerned that should requirements in relation to nutrient application be removed from the NES-F, and not be replaced with any reporting requirement, this would not uphold the high standards of the industry that the Package 3 Discussion Document implies the industry is currently achieving in relation to nutrient use. For this reason, Parininihi ki Waitōtara recommend their retention in the NES-F.
50. In terms of the proposed repealing of the 190 kilogram per hectare nitrogen limit ('nitrogen cap'), Parininihi ki Waitōtara agree that the control and ownership in relation to nutrient use has significantly improved. PKW use significantly less than nitrogen cap prescribed in the NES-F and report usage to the Taranaki Regional Council. As described earlier, Parininihi ki Waitōtara acknowledge the improvement of the industry in relation to nutrient usage; however, in the absence of any reporting requirement, this would not uphold the high standards of the industry that the Package 3 Discussion Document implies the industry is currently achieving in relation to nutrient usage. For this reason, Parininihi ki Waitōtara recommend the nitrogen cap retention in the NES-F.

#### *Freshwater Farm Plans (FW-FPs)*

51. Parininihi ki Waitōtara currently utilise environmental farm plans across our farms and acknowledge that engagement on FW-FPs will form part of a wider engagement. We agree that FW-FPs are a practical way for land users to identify impacts and improve land use practices. We consider any efficiency changes to the system should not be at the continued detriment of the health and well-being of the natural and physical environment, Māori property rights and Te Tiriti rights and interests. It is well known that good operators committed to high standards and continuous improvements in environmental performance utilise farm environmental plans successfully – it must be a requirement for all operators and land users to ensure the high standards and continuous improvements in environmental performance are upheld. Good operators should not have to be responsible for carrying the operators who lack commitment to

improving practices and have poor environmental performance in the event FW-FPs were removed. All land users must strive to high standards of environmental performance, FW-FPs are but one tool that can be utilised in raising the standard.

#### **Recommendation**

52. In the absence of meaningful engagement with Parininihi ki Waitōtara on the proposed amendments to the RMA national direction documents, Parininihi ki Waitōtara on balance oppose the amendments. If the proposals are amended in line with those proposed, good industry and land user operators with commitments to high standards of environmental performance and protection and restoration of the natural and physical environment, will eventually carry those operators without commitments to high standards of environmental performance and continuous improvements – high standards must be retained in the national direction to ensure the natural and physical environment is maintained for current and future generations.
53. We welcome Ministry for the Environment kaimahi to engage and kōrero with PKW and undertake site visits to better understand our operations. The proposed amendments will impact the Parininihi ki Waitōtara Te Tiriti rights and interests and cause detrimental harm to the natural and physical environment.

Naku iti noa



Aisha Ross

Te Rau Matomato – Chief Executive Officer  
Parininihi ki Waitōtara Incorporation

Appendix A: Key kaupapa, whāinga and mahi from the Parininihi ki Waitōtara Kaitiakitanga Strategy

**PARININIHI KI WAITOTARA**



**WAI MĀORI  
WATER**

Ō Mātou Tūmanakotanga

PKW will ensure that taonga species thrive in the waterways that flow on and under our whenua. We will ensure that our whanau can play in, and our animals can drink safely from, our awa and our farming practices do not create enduring damage to the mauri of our wai.

<b>TIAKI MAURI</b>	<b>ARO PARAPARA</b>	<b>ARO WHAKAMAHI WAI</b>	<b>TĀMARU TE WAI</b>
MAURI MONITORING	DISCHARGE MANAGEMENT	WATER QUANTITY	PROTECTION

HE TANGATA HE WHENUA HE ORANGA  
SUSTAINING AND GROWING OUR PEOPLE THROUGH  
PROSPERITY

	HE WHĀINGA	MAHINGA	MAHINGA	MAHINGA	TE WĀ ME TE UTU
	PKW understands the state of the Mauri and continuously monitors	A Cultural Health Monitoring regime will be established for all waterways.	Baseline monitoring of all waterways will be completed including biodiversity		18 months initial phase then annual monitoring. \$30k initial cost, \$2k annual cost
	The mauri of Wai Māori within PKW will be protected, cared for and restored.	Recommenations of the PKW Compliance report implemented.	Recommenations of the PKW Compliance costed.		5 years Costing to be confirmed
	PKW efficiently uses only the water we need and that there is enough water for the awa	All water takes are measured from the source.	Water Assessments complete identifying long term efficiencies that can be made for use		12 months \$40k
	PKW is actively protecting the mauri of waterways	High priority areas in the Ngā Whenua Rāhui report completed	All waterways, including those not required under compliance are fenced.	All waterways have two metre native riparian strips	10 years \$4.5m Collaboratively funded

# PARININIHI KI WAITOTARA



## KANORAU KOIORA

Moemoea

PKW will ensure that habitat for Taonga species is at a level that harvests can occur when sustainable. Plants and rākau will be available for activities such as weaving and carving.

TIAKI MAURI

MAURI MONITORING

NGĀ TAONGA

TAONGA SPECIES

TĀMARU TE NOHOANGA

PROTECTION

HE TANGATA HE WHENUA HE ORANGA  
SUSTAINING AND GROWING OUR PEOPLE THROUGH  
PROSPERITY

	HE WHAINGA	MAHINGA	MAHINGA	MAHINGA	TE WĀ ME TE UTU
<p>TIAKI MAURI</p>	PKW understands the state of the Mauri and continuously monitors	A Cultural Health Monitoring regime will be established for biodiversity.	Baseline assessments of flora and fauna on PKW lands will be completed		18 months initial phase then annual monitoring. \$30k initial cost, \$2k annual cost
<p>NGĀ TAONGA</p>	PKW will support rehabilitation of habitat for the most threatened species	Species programme initiated from assessments			10 years Costing to be confirmed
<p>TĀMARU TE NOHOANGA</p>	PKW is actively protecting the habitat of Taonga Species	High priority areas in the Nga Whenua Rahui report completed		All waterways have two meter native riparian strips	10 years \$4.5m Collaboratively funded

# PARININIHI KI WAITOTARA



## TUKANGA O TE MAHI PĀMU

Ō Mātou Whakaarotau

We are committed to farming practices that have the least negative impact on our Taiao, we will seek out the tools that ensure we are leaving our whenua to future generations in a healthy state. We will consistently improve the way we do things in our business and lead our industry in kaitiakitanga.

**FARM ENVIRONMENTAL MANAGEMENT PLANS**

**FACILITIES AND INFRASTRUCTURE**

**FDE STORAGE**

**HAZARDOUS SUBSTANCES**

**HE TANGATA HE WHENUA HE ORANGA  
SUSTAINING AND GROWING OUR PEOPLE THROUGH PROSPERITY**

	WHAINGA	MAHINGA	MAHINGA	MAHINGA	TE WĀ ME TE UTU
<b>FARM ENVIRONMENTAL MANAGEMENT PLANS</b>	PKW has a strategic and holistic approach to farming detailed in agreed plans.	Farm Management plans are commissioned and lodged with Council.			18 months initial phase then annual monitoring. \$30k initial cost.
<b>FACILITIES AND INFRASTRUCTURE</b>	PKW will have the optimum facilities in place to ensure our farming targets are met.	Assessment of facilities infrastructure completed as per the Compliance Report.	Long term budgets set for facilities upgrades as per assessment.		10 years Costing to be confirmed
<b>FARM DAIRY EFFLUENT STORAGE</b>	Efficient FDE provides PKW with flexibility and Enviro protection	Prioritise farms which do not have storage and install as per the DESC.	Calculate the DESC for all farms where there is storage to ensure current storage volume is sufficient	Assess whether to cease milking on some of the farms where the cost of storage work needs to be deferred.	10 years Costing to be confirmed
<b>HAZARDOUS SUBSTANCES</b>	PKW will ensure that all substances used in our Taiao are safe for our flora, fauna and whanau.	Ensure compliance with all relevant Laws.	Assess all substances against a mauri model to consider alternatives.		Internal Costs only
					

# PARININIHI KI WAITOTARA



## TŪHONONGA

Moemoea

PKW will enable the re connection of its people with their whenua and wai.

**HE MAHI  
WHENUA KĒ**

ALTERNATIVE LAND  
USE

**WAAHI TAPU**

SACRED PLACES

**URUNGA  
WHENUA**

ACCESS

**WHAKAMAHI I  
TE REO**

RECLAIMING OUR REO

**TAHUA PŪTEA  
TAIAO**

ENVIRONMENTAL  
FUND

HE TANGATA HE WHENUA HE ORANGA  
SUSTAINING AND GROWING OUR PEOPLE THROUGH  
PROSPERITY

	WHAINGA	HE KAUPAPA	HE KAUPAPA	HE KAUPAPA	TE WĀ ME TE UTU
HE MAHI WHENUA KĒ	PKW will identify lands available for alternative land use.	Identification of lands that could be retired for maara.	Establishment of an Environmental Roopu to discuss options for maara.		3 years \$10k initial cost, mainly internal costs.
WAAHI TAPU	PKW protects and manages wāhi tapu located on PKW whenua.	Waahi Tapu Policy is implemented	Waahi Tapu Identification Programme Established		2 years \$20k
URUNGA WHENUA	PKW enables consistent access for its whanau to their lands	Establishment of an Environmental Roopu to discuss options for access	Projects which can be co-managed in the Kaitiaki Programme are identified.	Access policy for cultural and environmental purposes confirmed for owners and hapu	5 years \$10k
WHAKAMAHI I TE REO	PKW embraces Te Reo and the cultural connection to the whenua	All places and spaces for PKW are named by Taranaki Whanau.			6 months Signage & Marketing costs \$10k
TAHUA PŪTEA TAIAO	PKW is actively protecting the mouri of the Taiao	Consideration of the establishment of a Taiao Fund for owners to access.	Identify the purpose of the fund, including training, project funding and wananga		1 year to establish \$50k annually

# PARININIHI KI WAITOTARA



## TE KÖKIRITANGA

Moemoea

PKW will be leaders in Kaitiakitanga, we will share our stories and positions and advocate for our kaitiaki expectations in all our relationships with customers, suppliers, local and central government and we will support those that align with our vision.



**KÖKIRI  
KAUPAPA**  
ADVOCACY

**WHAKAPIRINGA**  
RELATIONSHIPS

**NGĀ TŪNGA  
TAIAO**  
TAIAO POSITIONS

**TUKU KÖRERO**  
TRANSPARENCY

HE TANGATA HE WHENUA HE ORANGA  
SUSTAINING AND GROWING OUR PEOPLE THROUGH  
PROSPERITY

	WHAINGA	MAHINGA	MAHINGA	MAHINGA	TE WĀ ME TE UTU
KÖKIRI KAUPAPA	PKW takes all opportunities to advance their Taiao positions	Communications plan and brand plan confirmed for the sharing of Taiao Positions	Establishment of an Environmental Role to advance the positions and programmes	Submissions prepared and submitted for national and local policy	Annual Cost \$70k
WHAKAPIRINGA	PKW establishes partnerships with those who align with our positions	PKW chooses one partnership for joint programmes that align with the positions	Collaborate with Iwi on joint advocacy where they align with Taiao Positions.	PKW will give priority to those projects that can be co-funded	5 years \$100k
NGĀ TŪNGA TAIAO	PKW will determine their positions on all environmental matters	Establishment of an Environmental Statement which identifies mandated positions			3 years \$20k initial cost, mainly internal costs.
TUKU KÖRERO	PKW will share its stories on living kaitiakitanga with its people and stakeholders.	PKW will gather the data needed to understand its current state across its key kaupapa.	PKW will measure its progress or lack of it and report on these within its Annual Report.		12 months 50k for data gathering, internal costs for measurement.