

Before an Independent Hearing Panel of the Hawke's Bay Regional Council

In the matter of the Resource Management Act 1991 (the Act)

And

In the matter of of applications for resource consent (APP-123534, APP-123548, APP-123526,
APP-123550, APP-123535 and APP-123536)

Opening Hearings Submission of Ngaio Tiuka
on behalf of Ngāti Kahungunu Iwi Incorporated and Te Taiwhenua o Heretaunga
as Submitters to the Applications

10 December 2021

Introduction

1. Ngāti Kahungunu Iwi Incorporated (“NKII”) is an iwi authority, Te Taiwhenua o Heretaunga (“TToH”) is part and parcel of that authority. As entities we are a contemporary and legal expression of traditional social structures of tangata whenua, namely an iwi and a traditional takiwa (district) of hapū and marae to the iwi. These traditional indigenous social structures and the manifestation in the entities represented today predate successive Crowns policy to combine and approve, natural¹ or otherwise² assemblages of tangata whenua for Treaty of Waitangi Settlement purposes.
2. For the record in 2018, Ngāti Kahungunu had a population of 82,239³, the third largest iwi in the country, an estimated 21,318 people affiliated to Ngāti Kahungunu ki Heretaunga; 2,130 ki Whanganuia Orotu; 1,902 ki Tamatea⁴ NKII is the only Iwi Authority for Ngāti Kahungunu in its entirety and has approximately 37,000 registered members. Third liked iwi in the country on Facebook, formally the holder of the most liked iwi title. The traditional boundaries of Ngāti Kahungunu stretch from Paritu north of Mahia to Turakirae in south Wairarapa.
3. The Tukituki, Ngaruroro and Tutaekuri rivers, and the Heretaunga and Ruataniwha aquifer systems (“Heretaunga” and “Ruataniwha” respectively) are located within the tribal rohe of Ngāti Kahungunu and all are widely regarded as ‘taonga’. The protection of which is of the utmost importance to Ngāti Kahungunu, in particular the protection and preservation of their mana, mauri, natural processes; their interconnections (ki uta, ki tai) to each other (surface and groundwater) and other waterways / water bodies; their water quality and quantity; and, their relationship with tangata whenua according to tikanga.
4. The improvements in gravel management from historic practices is acknowledged. Counsel for the applicant noted the change from tangata whenua parties to previous submissions leading to us being here today. There are two main reasons for this:

¹ Iwi and hapū

² Large Natural Groupings

³ New Zealand, Census 2018.

⁴ New Zealand, Census 2018

- a. Firstly, site visit observations – witness to gravel extraction practices that concerned tangata whenua and seemed to differ from, “office” meetings and discussions.
 - b. Secondly, further engagement of mana whenua and various experts, for example Ms Wilson but also a range of surface and groundwater hydrologists, ecologists.
 - c. Lastly, (not a main reason) but the process was over such a long term. It was very difficult not to “accept the consent” however, after discussions on the river, new insights and observation, the obligation was clearer. No one wanted to put this matter behind us (to an extent) than us (Marei and I).
5. In addition, it’s worth noting that Mr Exeter acting for Council Consents department agrees with a number of points raised in Ms Wilsons evidence that would arguably improve the consent. In the interest of positive partnership, as noted in the draft MOU, looking to limit relevant matters raised is not in that spirit.
6. Through our submission, Ngāti Kahungunu Iwi Incorporated and Te Taiwhenua o Heretaunga will present evidence outlining the need and opportunity to further improvements to the conditions of the applied consent and gravel management. Particularly as they relate to the rights and responsibilities of tangata whenua, so that tangata whenua may ‘meaningfully feature’ in river management as it relates to gravel extraction and the opportunity to restore Te Mana o Te Wai. For clarity, our interests extend beyond Cultural matters and include physical interests and the general well-being of the river.
7. The following matters are traversed in this submission:
 - a. Background and Engagement
 - b. Te Ao Maori - Te Ao Pakeha
 - c. Cultural Matters
 - i. Cultural Impacts Assessments
 - ii. Hapū and Iwi Documents recognised by an Iwi Authority
 - iii. Cultural Monitoring
 - iv. Kaitaiki Liaison Group
 - v. Memorandum of Understanding
 - d. Aquifer
 - i. Braided Rivers Research Project
 - ii. NIWA Memo

- iii. Monitoring Quantity and Quality
- e. Ecosystems
 - i. Ecological monitoring, Natural Character, Financial Contributions, Expert Conferencing.

Background and Engagement

8. Tangata whenua have had their relationship with these rivers drastically and adversely affected by river/ waterway engineering⁵ and have long sought improvements and greater consideration of cultural concerns to the gravel management of these rivers⁶.
9. Ngāti Kahungunu Iwi Incorporated and Te Taiwhenua o Heretaunga has engaged Council and supported in principle the original application in the spirit of good will. As this unique consent (in the context of this area) it offers the opportunity for improvements and for HBRC to work meaningfully and in partnership with tangata whenua.
10. The engagement with Council was useful in gaining a greater understanding of river management, predominantly from an engineering perspective and priorities.
11. It's been fair to say there has been significant frustrations expressed on both sides. Mr Dolly references a "protracted process" from his perspective.
12. From my personal experience, it was emphasised from the very first face to face that 'we' should read the plethora of documents from HBRC in particular those developed by Asset Management. While, in turn there was equal expectation that HBRC should read and at the very least take into account the relevant iwi recognised documents. Not ideal. We have since read the code of practice, gravel management plans, ecological and enhancement plan – there is a lot of cross referencing, room for improvements, some assumptions worth challenging e.g. ecological assumptions; lack of scope (as it pertains to consent application), there is a need to update given their age and more 'meaningful' inclusion of tangata whenua. By 'meaningful', I refer to tangata whenua institutions (e.g. Iwi Authority) having access or capability to relevant expert advice. In other words, parity or equity.

⁵ Operation Patiki – Ngati Hori Management Plan, Tutaekuri Awa Management Plan, Ngaruroro Attributes and Values Report, and Mana Ake, an expression of kaitiakitanga.

⁶ Operation Patiki – Ngati Hori Management Plan – *"Hawkes Bay Regional Council extracts gravel at random times and location, which further destroys the systems supported by the Karamu"*

13. From the perspective of the applicant significant attention has been afforded to tangata whenua and significant time spent explaining the need and virtues of gravel extraction.
14. However, to provide context I refer to a rather concerning view from applicant captured in the provided *Hawke's Bay Gravel Management – Consultation Document page 2, para 13* that:
- a. *“HBRC cannot prevent more of these [iwi or hapū plans] types documents being prepared by tangata whenua and lodged with HBRC (or other councils)”*.⁷
 - b. This approach is contrary to the RMA ‘take into account’ as well as constructive dialogue.
15. Exacerbating the frustrations for tangata whenua was Asset Management response to our concerns where theoretical statements often did not match the physical observations. As previously noted. I’ll finish this submission with a powerpoint of images, to help paint the picture from our perspective – and part of the reasons behind the request for site visits.
16. From the perspective of tangata whenua, we have attempted to provide advice; have requested further information be considered; engaged in relevant but separate research projects and requested the attendance of specific and relevant expertise to be present in discussions and at site visits. There has been little to no engagement with the majority experts used to provide evidence. Not in the spirit of Treaty Partnership. Also note that Treaty Principles are within the Regional Resource Management Plan, Section 1.5.
17. Essentially talking past each other and from our view a lack of appreciation of cultural effects (which has a legacy and not uncommon) and lack of regard for physical effects, namely hydrological effects. Given a number of ‘empass’ points we suggested on site discussions / field trips, with all the relevant experts when discussions seemingly reached an empass. Major empass points
- a. Waahi tapu, Waahi taonga, mahinga kai protection.
 - b. River well-being, braid manipulation, risks and adverse effects.
 - c. Aquifer effects
18. Without labouring the point this has been significantly ‘different’ process with HBRC being the both the applicant and the decision maker. At times confusing or messy and

⁷ Hawke's Bay Gravel Management – Consultation Document page 2, para 13

difficult to demarcate roles and authority, different chairs of meetings and pressure or interest from the CEO to “hurry things along”. I formally requested in writing that the CEO’s, [potential] conflict of interest be excluded from the discussions and process. However, during the site visit – there was involvement and interpretations made in terms of cultural heritage and significant sites in response to Mr Apatu’s concerns.

Te Ao Māori - Te Ao Pakeha - Iwi Technical Expertise and Relations

19. Probably contrary to the applicants perspective we are here to help. We believe we are well-placed to understand the accepted policy, practice and western science (Te Ao Pakeha) as well as cultural interests, networks with tangata whenua, hapu, marae, taiwhenua and iwi (Te Ao Māori) - to help provide the improvements needed.

- a. We engage directly a significant number of relevant experts from both sides as well as, on site observations and relationships with kaitiaki.
- b. We have also successfully worked with the works group on Operating Procedures pertaining to drain clearance. As Shade Smith’s evidence notes. As well as developing arrangements of a ‘forum’ in the relatively recent Wairoa Wastewater Consent Decision.

Cultural Matters

20. Ngāti Kahungunu advocate for the right of tangata whenua, to simply be, tangata whenua, to be Māori in terms of ‘culture’, ‘cultural practices’ and ‘tikanga’; and, to live and express that relationship with their waters, with each of the awa and all the various and related components. There are a growing number of legal and policy provisions that are designed to provide for this. From section 6e in the RMA to the new NPS FM 2020 and Te Mana o te Wai and provisions within HBRC’s RPS/RRMP. The notable trend is more provisions to essentially support or enable Māori being Māori are being developed and incorporated within New Zealand’s natural resource management framework. For example, Taumata Arowai Act, Water Services Act and proposed Natural and Built Environment legislation, so on and so forth.

21. We also see no reason why legally enablement of gravel extraction for flood control can not operate within a framework that protects the afore mentioned rights of tangata

whenua, culture, tikanga and relationship with the awa. According to the applicants, perhaps only the Tukituki, has aspects not pertaining to flood control.

22. However, gravel extraction unrelated to 'flood control' needs to be identified as to not hide behind the legal and important provision for flood control. It diminishes the need for that activity, particularly where it is in conflict with other values.

Cultural Impacts Assessments

23. Most notable is the lack of Cultural Impacts Assessments ("CIA"). This is the job of the applicant, that they could resource this exercise similar to other disciplines e.g. geomorphologist. It's not acceptable that submitters in this case, volunteer the work to assist the applicant, despite from my personal experience this being a common expectation. If an ecologist was a submitter that would not be expected to volunteer the work for the applicant.
24. Given the novelty of the consent application, the size, scope and duration; each river deserves at the very least its own CIA. The iwi standard is for this to be developed or endorsed by the relevant hapū and encompassing entity, such as Taiwhenua.
25. Agree with Mr Exeter, a Cultural Impact Assessment at the s92 RMA stage was appropriate.
26. However, disagree and have questions regarding the solution proposed.
- a. Firstly, tangata whenua whether through our direct engagement or the Kaitiaki Liaison Group would look to "avoid" adverse effects on our cultural values rather than the common "mitigation" default. A trend needing remediation.
 - b. Secondly, there are questions regarding staging of an CIA over time of the consent – this could be 20 years or 10 years either option is too long, particularly since the initiative should have taken place prior.
27. It is not fair or just that cultural matters are ignored or "kicked down the road" unintended consequences (at times regardless if they have been raised by tangata whenua previously) often occur and further mitigation proposed. Management after the fact is always more difficult and certainly not "best practice", indeed "**avoidance**" is nigh impossible – that response to adverse effects Section 17, RMA is almost entirely

redundant to tangata whenua, our options are almost exclusively “mitigation” while, matters needing “remediation” are piling up, in my professional opinion.

Hapū and Iwi Documents recognised by an Iwi Authority and lodged with HBRC

28. Some of the important matters, contained within these plans were missed or downplayed. While, one highly relevant plan was totally omitted including a specific recommendation relevant to gravel extraction.
29. These plans should help form the initial foundation for constructive discussion and priorities. I have yet to see feedback on Iwi and hapū plans outside an officer’s report or planning evidence. A number of points raised in Iwi / hapū plans are noted below.
30. Operation Patiki – Ngāti Hori Management Plan –

- a. *“Hawkes Bay Regional Council extracts gravel at random times and location, which further destroys the systems supported by the Karamu”.*

31. Tutaekuri Awa Management Plan

- a. *Ngā Hapū o Tūtaekurī is concerned of the adverse effects that gravel extraction has on Papatūānuku. The interruption caused by gravel removal of natural geomorphic processes that shape the awa’s channel creates alterations in downstream river processes, and the adverse effects that this has on eco-systems is significant which in turn degrades the awa’s mauri. Over-extraction of river gravels from the Tūtaekurī awa can lower the riverbed, change the channel profile, and alter riverbed sediment composition. The resulting changes in river sediments and channel hydraulics could have significant effects on communities of benthic invertebrates, small creatures living within the gravels, and fish. Farther downstream, reduced gravel supplies to the coast can upset the stability of the Waitangi Estuary and can accelerate coastal erosion (Kelly et al, 2005). We are also concerned of the localised effect that heavy machinery has on our manu and our ngāngara that reside and inhabit the awa’s gravels.*

32. Tangata whenua value to attributes and management priorities for the Ngaruroro River:

- a. Within the section on Waahi Taonga, Waahi Tapu. Recommendation: *Aggregate and reconcile relevant parts of waahi taonga registers of HDC, NZAA, Treaty*

settlements etc. and adequately document the significance (including anecdotal korero) of each site, and the associated values that need consideration throughout the entire 4 TANK catchment. An example is provided using Ohiti Pa – a significant waahi tapu referred to by Mr Apatu. See powerpoint.

Table 7. Waahi Taonga Summary Example – Ohiti Pā

| Name | Description | Values |
|----------|---|---|
| Ohiti Pā | <p><u>Ngāti Upokoiri</u> pā⁷⁴ located on a hill alongside the Ngaruroro,^{V21/65} near Lake Runanga. The area is associated with Tamatea who trapped eels⁷⁵ there and kept a pet koura in the spring nearby while staying at Ohiti and whose kuri rushed across the river ahead of him.⁷⁶ Buchanan notes a neighbouring spring as a nursery for a particular type of eel.⁷⁷</p> <p>The NZAA note that the pa was later reworked as a redoubt^{V21/65} and towards the bottom of the hill are terraces and a pit,^{V21/64} nearby over the Ohiti Road is an urupā,^{V21/402} and across the river is another pa, kumara pits and house floor.^{V21/54}</p> | <p>Waahi taonga, history of residence / pāhi/ nohoanga, mahinga kai and cultural practices.</p> <ul style="list-style-type: none"> • Ngāti Upokoiri • Tamatea • Eels including a ‘particular type’, koura and kuri. <p>Waahi tapu and another Pā nearby.</p> <p>All other tangata whenua values are significantly present.</p> |

Through this project a number of sites have been located using a static GIS shape file primarily supplied by NZAA and compatible with Google Earth, however it is a significant process to reconcile and aggregate all the bundles of information and values that currently exist for each waahi taonga.

RECOMMENDATION: Aggregate and reconcile relevant parts of waahi taonga registers of HDC, NZAA, Treaty settlements etc. and adequately document the significance (including anecdotal korero) of each site, and the associated values that need consideration throughout the entire 4 TANK catchment.

- b. In the section on Whakapapa and Ki Uta, ki Tai. There is an good explanation on the philosophy and value of “ki uta, ki tai”, that would assist Council and non-Māori to understand the term better. However, I’ll highlight reference to gravel extraction, which states: *During engagement with tangata whenua for this project, the issue of gravel extraction and river mouth modification was raised as an issue, particularly the potential for adverse effects on Kaitiakitanga and mahinga kai values from gravel extraction and stream modification:*
- i. *The extraction of gravel in and around the confluence of the Ngaruroro and Waitio and effects on mahinga kai species, the natural character, local cultural practices and values.*
 - ii. *The human interventions at the river mouth affecting the natural character and natural processes, and diminishing recruitment of certain species.*

- c. *This Iwi hapū report (plan) **Recommends:** Restore and preserve natural river processes, particularly around the river mouth and avoid adverse impacts of gravel extraction and aggradation on tangata whenua values.*

Cultural Monitoring

33. Cultural monitoring and assessments should be resourced and supported. This can be achieved through the use of financial contributions under section 108 of the RMA. Resourcing needs to be clearly stipulated in the conditions. The Terms of Reference for Kaitiaki Liaison Group and relationship with cultural monitoring needs to be established as condition.
34. Waahi Taonga, Waahi Tapu and Mahinga Kai sites should be identified and protected. From our scan HBRC has no register, plans or policy pertaining to identifying or protection of waahi tapu, waahi taonga and mahinga kai. The only mention is within the Māori Advisory Committee charter whose tangata whenua members are assigned responsibility.
35. Further work to incorporate protection into the conditions is favoured, such as an agreed default protection distance, as a more significantly risk adverse approach rather than relying solely on a 'case by case analysis' approach. There's no reason a combination of approaches can't be incorporated, as long as retrospective protection is not compromised, where needed. We support the mapped and overlay with the proposed activities approach – as noted by Ms Wilsons evidence.

Kaitiaki Liaison Group

36. A terms of reference as part of the conditions (not the MOU) is favoured as best practice approach. The resourcing for this group could be clearer in this condition or conditions. Taiwhenua should receive financial contributions under at least section 108 of the RMA, to off-set cultural affects through the establishment, management, facilitation of respective Kaitiaki Liaison Groups (these name may need to change) and Kaitiaki Ranger or Awa Warden (to distinguish from other roles) for each respective awa (3 awa) or sections of awa in the case of the Tukituki. They should be afforded a level of autonomy to be able to act independently from Council with operations being facilitated through an entity such as a Taiwhenua.

37. Also would like to note we have had discussions with entities such as the Heretaunga Tamatea Settlement Trust – however, given capability and capacity issues, we are present and active on mana whenua’s behalf.
38. The Kaitiaki Liaison Group relationship to the cultural monitoring needs to be established, through the terms of reference. Does the group conduct the monitoring or review the cultural monitoring information as well as all other sources of relevant information? Similar arrangement were decided upon in collaboration / conjunction with HBRC in regards to the Wairoa wastewater hearings and decision.

Memorandum of Understanding (MOU)

39. The MOU needs to be separate to the conditions of the consent; the content of the MOU not necessarily being a matter for the hearings. However, a condition prior to the creation of the Kaitiaki Liaison Group could be that Council enters into a MOU with all relevant parties. Wording of which needs work.
40. The reliance on a potential MOU to address a range if not all cultural matters is unreasonable.

Aquifer

41. The braided rivers project with Lincoln Agritech, NIWA, HBRC and others. However, HBRC involvement has been intermittent with changing staff. To summarise the project the project leads state:
- a. The programme is a collaboration between a number of NZ and international research organisations, with a stakeholder advisory group consisting of regional councils (ECan, MDC, HBRC), Treaty Partners, central government organisations (MfE, DoC, MPI) and key practitioners.*
 - b. The aim is to understand how braided rivers work hydrologically in the relationship between surface flow, subsurface flow (hyporheic exchange), and groundwater exchange. By understanding how braided rivers work conceptually, we aim to appreciate how different aspects of river management influence their ability to sustain flows during dry periods and provide groundwater recharge.*

- c. *One of the main pieces of missing information about braided rivers is the extent and nature of subsurface saturation, and how it changes with different flow conditions. Our field programme focuses on collecting field observation data, which will be used as a basis for improved understanding. The braided river environment is a difficult and complex environment to study, and for this reason we intend to use a number of data collection techniques, some of which are novel and untested in this type of setting.*
- d. *The field data we collect is either used to inform an improved conceptualisation of a braided river system, and/or is used as a dataset to parameterise geophysical or hydrological models of the braided river system.*

NIWA Memo

- 42. Titled: Current understanding regarding the groundwater recharge from braided rivers and the potential impacts of gravel extraction.
- 43. Heretaunga is fortunate to be part of this research, it offers greater understanding and more informed decision making. The Memo is from NIWA Scientists Richard Measures and Jo Hoyle, whom have had experience in Hawke's Bay and the relevant rivers; and authored studies used by Council – *Modelling gravel transport, extraction and bed level change in the Ngaruroro River, prepared for Hawke's Bay Regional Council, October 2012.*
- 44. Legislative changes related to "3 waters", i.e. Taumata Arowai Water Service Regulatory Act and the Water Services Act have placed greater emphasis on the significance on protecting quantity and quality of drinking water sources e.g. Source Protection Zones (SPZ) and Regional Councils obligations. Section 42 of Taumata Arowai Water Service Regulatory Act – (as per Council officer's recent advice to Councillors) - Regional councils must contribute to the development of drinking water risk management plans, by identifying risks or hazards that could affect the quantity or quality of the source, including undertaking actions to address any risks (as agreed, or otherwise required by legislation) on behalf of a drinking water supplier.

45. The NIWA memo offers a formula to ‘**avoid**’ risks to quantity of the source” as it pertains to gravel extraction:

a. If gravel extraction is carried out at a rate which results in lowering of the bed levels (and hence water surface elevations) then it could thin the braidplain aquifer and reduce the rate of groundwater recharge. This link between bed levels and groundwater recharge makes sense conceptually, but the magnitude of this effect (and hence whether it is significant or not) has not been quantified. As part of the scenario modelling proposed for later stages of the research program, we plan to quantify these linkages.

a. In river reaches which are naturally aggrading (such as the Fernhill reach of the Ngaruroro), extraction at a rate less than or equal to the rate of natural deposition would not result in lowering of the riverbed, so would not reduce recharge. Monitoring bed levels relative to a ‘grade line’ below which no further extraction is allowed is a way of managing the impact of gravel extraction on bed levels. Setting an appropriate grade line to balance flood risk (if the bed is too high) verses risks associated with bed lowering (including potential impacts on groundwater recharge) is critical.

46. Source Protection Zones – assessments on potential effects of the proposed effects; in light of the research and a condition to adapt management accordingly to AVOID adverse effects is warranted. Conditions needs to be included with the formula and solution offered as well as a condition pertaining to water quality and risk aversion.

47. Somewhat Agree with Mr Exeter – Conditions relating to groundwater and groundwater recharge can be included rather than refined to avoid groundwater effects, along with appropriate monitoring.

48. Mr Exeter agrees with the evidence of Mr Smith, “that SkyTEM data should be reviewed and that resource consent conditions on groundwater investigations and monitoring can be further developed. This should be developed with the HBRC groundwater science team who manage the SkyTEM and groundwater monitoring programmes. “

Ecosystems

49. Support Mr Exeter's recommendation for expert conferencing of ecological monitoring conditions.
50. *Natural Character Index or Habitat Quality Index*, there is need to use a natural character index, we favour putting something in place via the conditions until something better comes along to give effect to section 6a of the RMA, *as a matter of national importance – recognise and provide for the following matters of national importance:*
- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development
51. Natural Character includes water flow and spring flows which are directly related to river recharge and groundwater characteristics. Mr Smith's evidence highlights this.
52. The TANK decision is irrelevant. There's are worrying them that some other pending outcome may or will resolve matter's, waiting for a future plan change like TANK is not needed and bit of a cop out. During TANK discussions and hearings, Mr Kay (whose TANK evidence was attached to Mr Smiths evidence with approval from the author) was informed gravel extraction was out of scope and more relevant to this global consent application. I personally don't recall any attention to gravel management during the TANK process which I has heavily involved in.

Financial Contributions – off setting environmental effects and inclusion of tangata whenua

53. Financial contributions, section 108 RMA - contributions for monitoring and resourcing the proposed 'freshwater improvement programme to off-set effects. This could naturally support the outcomes of relevant expert conferencing.

Significant Conservation Areas (SCA)

54. Ms Wilson outlines the need for protection of SCA's, supported by Mr Exeter.
- a. I agree that the maps require fine tuning from the applicant and conditions can then be refined to ensure that the referenced Significant Conservation Areas (SCA) are appropriately protected.

Conclusion

55. There are a number of issues identified for further attention. The devil is in the detail.

These issues need to be properly worked through as opposed to kicking the ball down the field by granting the consent without those details confirmed and proper plans in place.

56. While, there is reliance on us as submitters to resolve the obligation of cultural provision there is also duplicity reluctance to discuss matters holistically due to scope interpretations.

57. Would also like to note every submission in hearings to this council over the last 10 years, except 1 has resulted in changes, arguably improvements to Consents or Plans. The one exception, had success in Environment Court mediation and setting national case law with regards to water quality in the Environment Court. Often in decisions our evidence has been acknowledged as fulfilling a void with respect to cultural matters and physical matters e.g. the Tukituki Catchment Proposal these past submissions essentially provide a free service. While a cultural obligation with regards to kaitiakitanga we accept, it remains an unfair burden our respective entities. The legal obligation is not ours. Yet.

58. Greater accountability and relationships need to be incorporated and established for reasons outlined in our submission and evidence provided.

Nga mihi,

Ngaio Tiuka

Pouarataki mo te Taiao me ona Rawa,

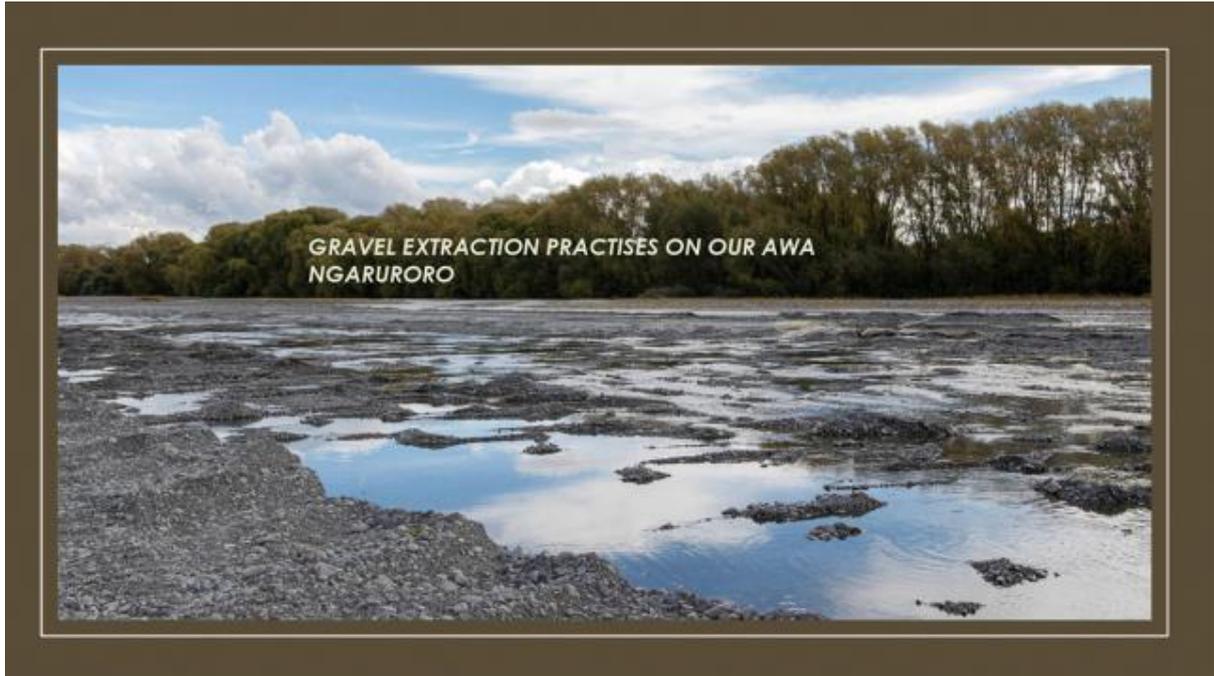
Ngati Kahungunun Iwi Incorporated

Ngaruroro – Carrick Road



Gravel extraction on the Ngaruroro River in Hawke's Bay. This is permitted, but it is not permitted to divert the main channel, which has allegedly occurred downstream of this





Ngaruroro Oct 25th 2020















