

**Te Rūnanga o Ngāi Tahu Position Statement**  
**Stewardship Land Reclassification – Te Tai Poutini**

**21 March 2025**

**PURPOSE**

1. This position statement provides information to the Minister of Conservation (the **Minister**) from Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (together **Poutini Ngāi Tahu**) and Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) (together **Ngāi Tahu**) to inform final decisions on the notified proposals for the reclassification of stewardship land for Te Tai Poutini (the **reclassification process**), consistent with section 4 (**section 4**) of the Conservation Act 1987 (the **Act**).
2. Under the December 2024 Stewardship Land Reclassification Agreement<sup>1</sup> (the **2024 Agreement**) Ngāi Tahu is providing information directly to the Minister to ensure the Minister is fully informed of the implications of the notified proposals with regard to the values and interests of Ngāi Tahu.
3. Ngāi Tahu has also provided feedback on the Summary of Submissions Report prepared by the Department of Conservation (the **Department**) under section 49(2)(d) of the Act (the **section 49 Report**), as per the 2024 Agreement.

**KEY MESSAGES**

4. The reclassification of stewardship land within the Ngāi Tahu takiwā is of immense importance to Ngāi Tahu. The reclassification process involves vast areas of whenua that Ngāi Tahu have been connected to as mana whenua for hundreds of years. Decisions on the reclassification of this whenua will have intergenerational impacts for Ngāi Tahu.
5. It is critical that the significance of section 4 and the role of Treaty principles in the reclassification process is clearly understood and correctly applied by the Minister and the Department so as to give effect to the principles of the Treaty.
6. Ngāi Tahu has committed to the reclassification process in good faith as Treaty partner and has invested significant time and resources to work alongside the Department to correctly apply section 4 to the reclassification process. However, Ngāi Tahu remains deeply concerned regarding

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<sup>1</sup> Agreement - Stewardship Land Reclassification Western South Island, Te Tai Poutini, December 2024, Schedule, Clauses 2.1 – 2.3

the ongoing errors in the Department's interpretation and application of section 4 throughout this process, including in the section 49 Report.

7. Ngāi Tahu agrees with a number of section 49 Report recommendations to proceed with the notified proposal, including:
  - a. Tarahanga e Toru Historic Reserve
  - b. Ngāi Tahu Historic Reserves – Kotorepi, Kaiata, Kōhuamaru
  - c. Stewardship areas to remain as stewardship land for specific Ngāi Tahu interests
  - d. 91 Conservation Parks
  - e. 20 Ecological Areas
  - f. 10 Historic Reserves (additional to the Ngāi Tahu Historic Reserves)
  - g. 95 Scenic Reserves
  - h. 17 Recreational Reserves
  - i. 41 Wildlife Management Areas
  - j. 65 Disposal or part Disposal
8. Ngāi Tahu has identified additional stewardship areas where there are Ngāi Tahu interests relating to pounamu, forestry, climate change mitigation and/or afforestation opportunities. Ngāi Tahu consider these areas should remain as stewardship land.
9. Ngāi Tahu opposes all proposed additions to national parks and considers that the Minister and the Department must take more time to understand, consider and discuss the implications with Ngāi Tahu before any decision can be made to refer national park proposals to the New Zealand Conservation Authority (**NZCA**).

## **CONTEXT**

### **Introduction**

10. Te Tiriti o Waitangi (**Te Tiriti**) provides for the enduring relationship of tangata whenua with their whenua, moana, awa and taonga, including mahinga kai resources. Ngāi Tahu expects the Crown to honour Te Tiriti, the Treaty principles, and the statutory recognition of Ngāi Tahu rangatiratanga within the Ngāi Tahu takiwā.
11. The relationship between the Crown and Ngāi Tahu is defined by three core documents: Te Tiriti, the Ngāi Tahu Deed of Settlement 1997 and the Ngāi Tahu Claims Settlement Act 1998. These documents

form an important legal relationship between Ngāi Tahu and the Crown and further entrench the Treaty partnership. Section 4 is inextricably linked to Ngāi Tahu settlement rights and interests.

12. The reclassification of stewardship land within the Ngāi Tahu takiwā is of immense importance to Ngāi Tahu. The reclassification process involves vast areas of whenua that Ngāi Tahu have been connected to as mana whenua for hundreds of years. Decisions on the reclassification of this whenua will have intergenerational impacts for Ngāi Tahu whānui. It is critical that the reclassification process gives effect to the principles of the Treaty of Waitangi as required by section 4.

## Background

13. In 2021, the then Government announced a new process to accelerate the reclassification of stewardship land, including the establishment of National Panels to make recommendations to the Minister for the reclassification of stewardship land in the Western South Island (Te Tai Poutini) and the Northern South Island. Te Rūnanga sought judicial review of this process on the basis it was in breach of section 4. To settle proceedings, an agreement was signed by the then Minister and the then Kaiwhakahaere of Te Rūnanga in October 2021 (the **2021 Agreement**). The commitments made in the 2021 Agreement ensured Ngāi Tahu would be directly involved in the reclassification processes for both Te Tai Poutini and the Northern South Island.
14. The 2021 Agreement resulted in the establishment of a Ngāi Tahu appointed Mana Whenua Panel<sup>2</sup> to work alongside the Government appointed National Panels<sup>3</sup> to provide information on Ngāi Tahu values and interests.
15. The 2021 Agreement also provided for the Mana Whenua Panel to work with the National Panels to develop draft recommendations, implement a public consultation process, and review recommendations. The Mana Whenua Panel had the ability to provide separate views and/or recommendations directly to the Minister if required.
16. The Mana Whenua Panel and Western South Island National Panel made recommendations for reclassification on Te Tai Poutini that went through a public notification process, with hearings held in September 2022. Following the hearings, the reclassification process for Te Tai Poutini went on hold and the Mana Whenua Panel moved on to assessing stewardship land in the Northern South Island region with the Northern South Island National Panel.

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<sup>2</sup> Four members appointed by Te Rūnanga o Ngāi Tahu including the Chairs of Poutini Ngāi Tahu.

<sup>3</sup> Independent National Panels were appointed to provide recommendations for new land classifications for stewardship land in the Western South Island and Northern South Island regions.

17. The 2021 Agreement expired in October 2023, and the Minister disbanded the National Panels in 2024. To continue the reclassification process for Te Tai Poutini, the 2024 Agreement was signed between the Minister and Ngāi Tahu describing how they would work together.
18. Ngāi Tahu notes that the reclassification process for the Northern South Island only progressed to the draft recommendation stage, as the process was put on hold in November 2023.
19. The Mana Whenua Panel and Northern South Island National Panel worked together to assess stewardship land in the Northern South Island. Ngāi Tahu acknowledges the positive and collaborative relationship between the two panels, and notes that the two panels agreed on all but one of the draft recommendations for reclassification.
20. Ngāi Tahu considers that the reclassification of stewardship land in the Northern South Island should continue.

#### **Section 4, Conservation Act 1987**

21. It is imperative that the significance of section 4 and the role of Treaty principles in the reclassification process is clearly understood and correctly applied by the Minister and the Department.
22. In 1995 Ngāi Tahu secured the leading decision on section 4 from the Court of Appeal (*Ngai Tahu Maori Trust Board v Director-General of Conservation - the Whales case*<sup>4</sup>). The Court of Appeal in the Whales case confirmed the powerful effect of section 4, that such Treaty provisions should not be narrowly construed and that on the facts of that case Ngāi Tahu was entitled to a reasonable degree of preference to marine mammal watching permits.
23. In 2018 Ngāi Tahu joined Supreme Court proceedings on section 4 which were being led by Ngāi Tai ki Tāmaki.<sup>5</sup> The Ngāi Tai ki Tāmaki proceeding was significant for Ngāi Tahu as it took the next step from the Ngāi Tahu Whales case and is the leading judicial authority on section 4. The Ngāi Tai decision confirms the critical importance of Treaty principles in the context of conservation processes and decision-making and in particular, that:
  - a. Section 4 of the Conservation Act is a powerful provision which should not be narrowly construed<sup>6</sup>;

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<sup>4</sup> *Ngai Tahu Maori Trust Board v Director-General of Conservation* [1995] 3 NZLR 553 (CA).

<sup>5</sup> *Ngāi Tai Ki Tāmaki Tribal Trust v Minister of Conservation* [2018] NZSC 122.

<sup>6</sup> At [52(a)]

- b. Section 4 requires more than procedural steps - substantive outcomes for iwi may be necessary<sup>7</sup>;
  - c. Enabling iwi or hapū to reconnect to their ancestral lands by taking up opportunities on the conservation estate (whether through concessions or otherwise) is one way that the Crown can give practical effect to Treaty principles<sup>8</sup>;
  - d. Section 4 should not be seen as being trumped by other conservation-related considerations (such as those mentioned in paragraph [54] of the judgment). Nor should section 4 merely be part of an exercise balancing it against the other relevant considerations<sup>9</sup>;
  - e. What is required is a process under which the meeting of other statutory or non-statutory objectives is achieved, to the extent that can be done consistently with section 4, in a way that best gives effect to the relevant Treaty principles<sup>10</sup>; and
  - f. The factual context is important in terms of how section 4 and the Treaty principles should be applied in any particular case<sup>11</sup>.
24. In the context of reclassification, the application of section 4 in practical terms requires that (by way of example):
- a. All persons involved in the reclassification process must have a strong understanding of and correctly apply section 4 and the Treaty principles.
  - b. Section 4 is the fundamental starting point in any reclassification decision. Section 4 should not be trumped by other conservation considerations or diluted by forming part of a balancing exercise against other relevant conservation considerations and objectives.
  - c. The implications of stronger forms of protected area status (e.g. National parks) from a Ngāi Tahu perspective must be clearly understood.
  - d. The values and interests of Ngāi Tahu, as mana whenua, must be fully understood and appropriately addressed. If Ngāi Tahu values and interests cannot be accommodated through the reclassification, then the reclassification should not proceed.

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<sup>7</sup> At [52(b)]

<sup>8</sup> At [52(c)]

<sup>9</sup> At [54]

<sup>10</sup> At [54]

<sup>11</sup> At [52]

- e. Reclassification of some stewardship land is deferred until there are protected area classifications in place that better give effect to Ngāi Tahu rangatiratanga, section 4 and the Treaty principles.
25. There needs to be certainty that the full range of Ngāi Tahu interests, including cultural, social and economic interests are considered and will be protected, as stronger protected area classifications can create impediments to Ngāi Tahu exercising their rights and interests.

## **NGĀI TAHU POSITION**

26. Ngāi Tahu has committed to the reclassification process in good faith as the Treaty partner and has invested significant time and resources into working alongside the National Panel and the Department to navigate the application of section 4 in a reclassification context.
27. However, Ngāi Tahu remains deeply concerned regarding the ongoing errors in the Department's interpretation and application of section 4 throughout this process. Of particular note, notwithstanding the Ngāi Tahu direct feedback and input into the section 49 Report, the Department's interpretation of section 4 remains legally incorrect.
28. Ngāi Tahu considers that the section 49 Report fails to accord an appropriate hierarchy to the consideration of matters, specifically section 4. Paragraphs 94 and 96 to 97 (inclusive) downplay the significance of section 4 and the Treaty Principles and risks misdirecting the Minister. The Ngāi Tahu decision is clear that section 4 must be considered first, before other statutory and non-statutory objectives or competing factors can be evaluated. The repeated suggestion for the Minister to "reconcile Treaty Principles with other relevant values" and/or to "reconcile [the nature of the interest claimed] with any wider or competing rights or interests" is clearly inconsistent with the Treaty and section 4.
29. This is deeply concerning to Ngāi Tahu as it indicates a fundamental misunderstanding of the Department's legal and Treaty obligations. Any reclassifications decisions which are founded on incorrect principles of law are open to being challenged legally. Ngāi Tahu will not accept any derogation from its rights or any process that does not comply with section 4. Consequently, while continuing to engage as the Treaty partner, Ngāi Tahu reserves all of its rights in relation to the reclassification process and potential outcomes.

## STEWARDSHIP LAND RECLASSIFICATION – TE TAI POUTINI

### Key Concerns – Process to Date

30. The reclassification process on Te Tai Poutini is particularly complex due to its scale, the ambitious timeframes set by the then Minister, and the novel approach of using National Panels to make reclassification recommendations. The Mana Whenua Panel raised concerns with the Department relating to section 4, procedural matters and technical/legal advice provided on a number of occasions throughout the reclassification process.
31. Ngāi Tahu notes that during the assessment phase of the reclassification process, the National Panel was unwilling to engage in a meaningful way with the Mana Whenua Panel to discuss Ngāi Tahu values and interests and appropriate classification(s) that would recognise these. This substantially limited Ngāi Tahu involvement in the assessment process.
32. However, the Mana Whenua Panel and the National Panel did agree that classifications in the current conservation legislation do not appropriately recognise and provide for Ngāi Tahu values and interests for a select number of stewardship areas of particular significance to Ngāi Tahu.
33. As an alternative, section 18(1) of the Act (**section 18(1)**) was identified as a mechanism to develop a classification that would reflect both Ngāi Tahu and conservation purposes.
34. The Mana Whenua Panel made a significant commitment to developing a Ngāi Tahu/conservation classification under section 18(1) that could provide an opportunity to recognise and provide for Ngāi Tahu and conservation values together in certain discrete areas of stewardship land. The Mana Whenua Panel developed and brought this option to the table with the National Panel in the spirit of Treaty partnership, and the Department was included in the discussions between the Mana Whenua Panel and the National Panel.
35. The Department supported the approach of using section 18(1) for a number of months, however as the Mana Whenua Panel and National Panel were finalising recommendations, the Department advised that the use of section 18(1) was not legally available. Although the proposal to use section 18(1) was initiated by the Mana Whenua Panel, the Department's position was provided directly to the National Panel and without any notice to or engagement with the Mana Whenua Panel.
36. The approach and conduct by the Department in relation to the proposal to use section 18(1) was not only highly disrespectful and dismissive of the Treaty partnership and the requirement to act in good faith with Ngāi Tahu, but also legally flawed and inconsistent with the Department's obligations under section 4.

37. Consequently, the Mana Whenua Panel had to reconsider the suitability of available classifications for areas of particular significance to Ngāi Tahu. The Mana Whenua Panel identified a combination of historic reserves and/or local purpose reserves as classifications that would recognise Ngāi Tahu values and interests, albeit in a limited way. The Mana Whenua Panel and the National Panel also agreed that some areas should remain as stewardship land to enable further consideration of the Ngāi Tahu values and interests and mechanisms to recognise these appropriately under section 4.
38. As stated throughout the reclassification process and notwithstanding the Department's position on section 18(1), Ngāi Tahu continues to reserve its position on whether there may be more appropriate forms of protected area classifications from a Ngāi Tahu perspective that are developed. It may be that if areas are reclassified, those areas are subject to ongoing and future reviews to ensure they continue to reflect the circumstances, section 4 and the Treaty principles.
39. There is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā. Where there is an absence of specific Ngāi Tahu values and interests identified within the reclassification process, this does not detract from that connection, nor does it confirm that Ngāi Tahu values and interests are not present. A section 4 and Treaty principles perspective is required as well, and it may be that areas of land are significant from that broader perspective.

#### **Classification Names**

40. Ngāi Tahu notes that during the reclassification process, Ngāi Tahu was advised at a very late stage that names were required for new classifications prior to notification. The identification and use of place names in the Ngāi Tahu takiwā is highly significant to Ngāi Tahu and this is a process that should not be subject to undue haste. Ngāi Tahu reserves the right to review the names given during the reclassification process, and considers that the Department should initiate a process with Ngāi Tahu to confirm the names for the new classifications after the Minister has made decisions on reclassification.

#### **Feedback on Summary of Submissions Report and Notified Proposals**

41. As per the 2024 Agreement<sup>12</sup>, Ngāi Tahu analysed the draft section 49 Report. Due to the short timeframe, Ngāi Tahu focused its review of the section 49 Report to matters of particular significance to Ngāi Tahu. These include points of clarification, ensuring Ngāi Tahu values and interests are accurately represented in the section 49 Report, identifying any concerns with how the analysis has been undertaken, and noting inconsistencies in the section 49 Report.

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<sup>12</sup> Agreement - Stewardship Land Reclassification Western South Island, Te Tai Poutini, December 2024, Schedule, Clause 1.2



42. Some of the matters identified by Ngāi Tahu have been resolved with the Department. However, as detailed in paragraphs 27 to 29 above, Ngāi Tahu continues to disagree with the Department's interpretation of the legal framework and application of section 4 as set out in the section 49 Report.
43. Ngāi Tahu agrees with a number of section 49 Report recommendations to proceed with the notified proposal, including:
- a. Tarahanga e Toru Historic Reserve
  - b. Ngāi Tahu Historic Reserves – Kotorepi, Kaiata, Kōhuamaru
  - c. Stewardship areas to remain as stewardship land for specific Ngāi Tahu interests
  - d. 91 Conservation Parks (23 in Te Wāhi Pounamu)
  - e. 20 Ecological Areas
  - f. 10 Historic Reserves (additional to the Ngāi Tahu Historic Reserves)
  - g. 95 Scenic Reserves
  - h. 17 Recreational Reserves
  - i. 41 Wildlife Management Areas
  - j. 65 Disposal or part Disposal
44. Areas of disagreement relate to:
- a. Additions to national parks.
  - b. Areas Ngāi Tahu seek to remain as stewardship land to enable further assessment of the values and opportunities of the whenua for Ngāi Tahu under section 4. Many of these areas contain pounamu or are adjacent to Ngāi Tahu Forestry.
  - c. Areas where Ngāi Tahu consider reclassification should not occur at this time to enable consideration of matters such as applications proceeding through the fast-track process, land potentially required for local infrastructure and climate mitigation planning for Te Tai Poutini, and future opportunities for the Department and wider West Coast region.
  - d. Areas where Ngāi Tahu considers the values of the stewardship area do not justify the recommended classification.
45. Further detail on these matters is provided below.

## National Park Additions

46. There were 49 notified proposals to refer stewardship areas to the NZCA for their consideration to be added to national parks. The section 49 Report recommends that you proceed with 48 of these.
47. Ngāi Tahu opposes all additions to national parks within the Ngāi Tahu takiwā. This position was supported by the Mana Whenua Panel throughout the reclassification process for Te Tai Poutini. The fundamental basis for this position is that the addition of land to national parks will not give effect to the principles of the Treaty as required by section 4, as it alienates Ngāi Tahu from our ancestral lands.
48. National parks are subject to more stringent preservation and protection imperatives than other protected area classifications. This impedes Ngāi Tahu from maintaining ancestral relationships with the whenua, obstructs kaitiaki rights and responsibilities, limits the meaningful involvement of Ngāi Tahu in decision-making processes, and is less enabling of customary practices that are fundamental to sustaining tribal identity and mana.
49. Further, the Supreme Court decision in Ngāi Tai ki Tāmaki confirmed, that:

“... enabling iwi or hapū to reconnect to their ancestral lands by taking up opportunities on the conservation estate (whether through concessions or otherwise) is one way that the Crown can give practical effect to Treaty principles.”<sup>13</sup>
50. The Ngāi Tahu takiwā holds nine of New Zealand’s 13 national parks, and seven of these are in Te Tai Poutini. Ngāi Tahu has endured decades of disconnect and alienation from this whenua. Ngāi Tahu is continually expected by the Crown to compromise, with additions to Kahurangi National Park and Paparoa National Park being recent examples. The additions have a cumulative impact on Ngāi Tahu, and any process that seeks to add more whenua in the Ngāi Tahu takiwā to national park will be strongly opposed by Ngāi Tahu.
51. Ngāi Tahu has concerns regarding the approach taken to national parks through the reclassification process to date. In particular:
  - a. Throughout the reclassification process the statutory process was unclear. Ngāi Tahu repeatedly sought clarification on matters relating to the statutory process that applies to national park additions, and the status of the reclassification process in any future consideration by the NZCA.

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<sup>13</sup> *Ngāi Tai Ki Tāmaki Tribal Trust v Minister of Conservation* [2018] NZSC 122. [14 December 2018]. At [52(c)].

- b. The National Panel and the Department did not fulfil their section 4 obligations, as they did not take enough time to discuss the concerns of the Mana Whenua Panel or Ngāi Tahu respectively in relation to national park additions to understand the values and interests of, and the implications for Ngāi Tahu in this significant whenua.
  - c. National parks are a particularly strong form of protected area status. To understand the implications from a Ngāi Tahu perspective, more time should have been spent during the assessment phase to analyse each stewardship area in detail from a section 4 and Ngāi Tahu perspective, to understand exactly what Ngāi Tahu values and interests are in each area (noting that Ngāi Tahu has a strong connection across all of the whenua irrespective of whether specific matters are identified).
  - d. The section 4 analysis undertaken in the section 49 Report for each notified proposal does not appropriately acknowledge or address the concerns raised by the Mana Whenua Panel.
  - e. The section 49 Report suggests that referral of land to the NZCA is an opportunity to further explore specific Ngāi Tahu values and interests<sup>14</sup>. It is inappropriate for the Department to recommend relying on the NZCA to undertake a section 4 analysis. The Director-General cannot defer or delegate this statutory obligation to others (such as the NZCA) or later in the process.
  - f. The section 49 Report suggests that the NZCA may decide not to undertake a formal investigation as the “...national park values have already been investigated or are already well documented, because the WSI reclassification process has elicited public information that is available to the NZCA.”<sup>15</sup> It is inappropriate for the section 49 Report to suggest this. This is a decision for the NZCA. Ngāi Tahu considers that the reclassification process does not in any way constitute a satisfactory investigation or documentation of section 4 matters or national park values.
52. Ngāi Tahu considers that before any decision can be made to refer national park proposals to the NZCA, the Minister and the Department must take more time to understand, consider and discuss the implications with Ngāi Tahu. Failing to do so, and until the Ngāi Tahu position on national parks

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<sup>14</sup> Example from the section 49 Report on notified proposal for PAP\_06 Charleston 2808367 in the section 4 analysis: “Referring this area to the NZCA for their consideration provides an opportunity for the NZCA to further assess the natural and historic resources present, and explore specific Ngāi Tahu interests and aspirations, including their consideration as to what giving effect to Treaty principles may require.”

<sup>15</sup> Section 49 Report, paragraph 55.

is addressed, it would be entirely inappropriate and in breach of section 4 of the Conservation Act to consider any additions to national parks.

53. If the implications of stronger forms of protected area status from a Ngāi Tahu perspective are not clearly understood, and if the Ngāi Tahu values cannot be accommodated through the reclassification, then reclassification should not proceed.

54. Ngāi Tahu notes with concern the submission made by the NZCA on the notified proposals. The submission states...

“The NZCA agrees with and strongly supports all the above recommendations from the Western South Island National Panel, that these land parcels be added to existing National Parks.”<sup>16</sup>

55. Ngāi Tahu considers it to be inappropriate for the NZCA to make this statement prior to the commencement of any statutory process under which the NZCA may consider land for addition to national parks.

56. Furthermore, the NZCA submission also states that...

“While we still have limited information about the nuances of the Ngāi Tahu position, we now understand that although Ngāi Tahu continues to maintain a position in principle of opposition to National Park additions, Ngāi Tahu has agreed to, and is comfortable with, the process continuing and with the Minister making decisions on all recommendations including potential additions to National Parks.”<sup>17</sup>

57. Further, ...

“On that basis, we understand that it would not be inconsistent with section 4 for the NZCA to take the view in this submission that land parcels which the National Panel recommended for addition to a National Park should be added to National Parks.”<sup>18</sup>

58. These statements are dismissive of Ngāi Tahu concerns relating to national parks and are an incorrect representation of the Ngāi Tahu position.

59. Ngāi Tahu considers that any future statutory process undertaken by the NZCA will be biased given the position stated in the NZCA submission.

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<sup>16</sup> NZCA Submission [SLR-10020770 - New Zealand Conservation Authority.pdf](#) page 6, Appendix 1, paragraph 2.

<sup>17</sup> Ibid, page 2, paragraph 23.

<sup>18</sup> Ibid, page 2, paragraph 24.

60. The Minister, the Director-General (or their delegate), the Department, the National Panel and the NZCA are all directly subject to section 4 and must comply with that obligation at each point in the reclassification process.

### **Whenua Significant to Ngāi Tahu**

#### ***Tarahanga e Toru Historic Reserve***

61. The stewardship areas contained within the proposed Tarahanga e Toru Historic Reserve is of immense significance to Ngāi Tahu (refer to Appendix 1). The historic reserve classification recommended by the Mana Whenua Panel and the National Panel recognises this significance and the connection of Ngāi Tahu to this whenua.
62. This central region of Te Tai Poutini is the heart of Poutini Ngāi Tahu legends, customs and traditions centred around pounamu. The Tarahanga e Toru Historic Reserve acknowledges the ara tawhito, the passes used to link the east and west coasts, the mahinga kai resources that supported pā, seasonal nohoanga and travellers, and the legends and battles associated with this taonga. Historical and contemporary associations with pounamu are integral to Ngāi Tahu identity and this is recognised through the creation of a historic reserve.
63. Further, Ngāi Tahu agrees with the National Panel statement that...

“...an historic reserve is considered appropriate to protect and illustrate the significance of the identified historic and archaeological features and reflect the value of the area to Ngāi Tahu, while preserving the indigenous flora and fauna present and providing for the existing recreational use of the area.”<sup>19</sup>

64. The section 49 Report recommendations for these areas are to proceed with the notified proposal of historic reserve, and these are supported by Ngāi Tahu.

#### ***Ngāi Tahu Historic Reserves***

65. A further three stewardship areas were notified by both the Mana Whenua Panel and National Panel to be reclassified as historic reserves to recognise their significance in Ngāi Tahu history (refer to Appendix 2).
66. The section 49 Report recommendations for these areas are to proceed with the notified proposal of historic reserve, and these are supported by Ngāi Tahu.

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<sup>19</sup> Stewardship Land Review: Recommendation HOK\_01, 03, 19 – Kumara, Wardens Road, Taramakau Riverbed, Kawaka Forest, Taramakau River/Ōtira River, Wanganui/Otira Catchments (part), page 4.

### ***Ngāi Tahu Local Purpose Reserves***

67. Ten local purpose reserves were notified by both the Mana Whenua Panel and the National Panel in recognition of sites of particular significance to Ngāi Tahu. These stewardship areas include the visitor centre at Punakaiki, and whenua that is valued for nohoanga, mahinga kai, pounamu and trails (refer to Appendix 3).
68. The section 49 Report recommendations for these areas are to not proceed with the notified classification of local purpose reserve, on the basis that that further policy work is required. The policy work would describe in more detail the purpose of the reserve, to provide clarity as to whether the proposed classification is appropriate or if an alternative should be considered.
69. Ngāi Tahu agrees that further work is required to determine the appropriate classification that acknowledges and recognises Ngāi Tahu values and interests in this significant whenua.
70. Ngāi Tahu requests that the further policy work commences immediately to enable the Minister to reclassify these stewardship areas.

### ***Additional Significant Ngāi Tahu Whenua***

71. There are other stewardship areas that Ngāi Tahu considers should remain as stewardship land. Ngāi Tahu interests in these areas include papakāinga, historic pā site, access to wāhi tapu of significance and potential for additions to Māori Reserve land. The section 49 Report recommendations on these areas are detailed in Appendix 4.
72. Ngāi Tahu considers these areas should remain as stewardship land to enable further section 4 assessment of the Ngāi Tahu values and interests in this whenua.

### ***Ngāi Tahu Specific Interests***

73. Specific Ngāi Tahu interests were identified by the Mana Whenua Panel for three areas of stewardship land which contain pounamu resources<sup>20</sup> and are adjacent to Ngāi Tahu Forestry (refer to Appendix 5).
74. These areas were notified by both the Mana Whenua Panel and the National Panel to remain as stewardship land to enable further section 4 assessment of the Ngāi Tahu economic and development aspirations for this whenua.

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<sup>20</sup> Pounamu is vested in Te Rūnanga o Ngāi Tahu pursuant to the Ngāi Tahu (Pounamu Vesting) Act 1997, in recognition of its significance to Ngāi Tahu. As kaitiaki, Ngāi Tahu has rights and responsibilities for the management of pounamu.

75. The section 49 Report recommendations for these areas are to proceed with the notified proposals to retain as stewardship land and these are supported by Ngāi Tahu.
76. Further to these areas, Ngāi Tahu has identified additional stewardship areas where pounamu and forestry interests are present (refer to Appendix 6). The notified proposals for these areas varied.
77. Ngāi Tahu considers there is potential for these areas for either pounamu, forestry, climate change mitigation and/or afforestation opportunities.
78. Ngāi Tahu considers that the Minister should not proceed with the notified proposals and for these areas to remain as stewardship land to enable further section 4 assessment of the Ngāi Tahu economic and development aspirations for this whenua. This approach is consistent with section 4 and Treaty principles of informed decision making and active protection.

### **Other Stewardship Land**

#### ***Central and Local Government Priorities***

79. A number of stewardship areas were identified by the Mana Whenua Panel as relevant to local and central government priorities, including infrastructure, climate change mitigation, renewable energy, critical minerals and mining remediation (refer to Appendix 7). The notified proposals for these areas varied.
80. Ngāi Tahu considers that the Minister should not proceed with the various notified proposals and for these areas to remain as stewardship land to enable further assessment of values, interests and opportunities of this land in relation to government priorities.

#### ***Fast Track Proposals***

81. Ngāi Tahu notes that there a number of stewardship areas which are included in the listed projects under the Fast-Track Approvals Act 2024<sup>21</sup>, these include: Arahura Papakāinga Housing, Waitaha Hydro Project and Buller Plateaux Continuation.

#### ***Five Iwi Afforestation Project***

82. In 2009 Ngāi Tahu (and four other iwi) reached agreement with the Crown to resolve issues that arose from the Crown's failure to disclose the Crown's intention to introduce an Emission Trading Scheme during treaty settlement negotiations. This agreement is known as the Five Iwi Afforestation Project and involves the Crown making land available to the five iwi for afforestation. Ngāi Tahu

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<sup>21</sup> Fast-Track Approvals Act 2024 – Schedule 2 Listed Projects

highlight that the Crown should ensure decisions made as part of the reclassification process should not constrain the Crown's ability to meet its Five Iwi Afforestation Project obligations.

### ***Appropriate Classification***

83. There are some stewardship areas where Ngāi Tahu disagrees with the section 49 Report recommendations on the basis that the recommendation does not reflect the values of the stewardship area. These are summarised in Appendix 8.

### **CONCLUSION**

84. Reclassification of whenua in the Ngāi Tahu takiwā must acknowledge the rangatiratanga and mana of Ngāi Tahu.
85. Ngāi Tahu looks forward to meeting with the Minister as per the 2024 Agreement<sup>22</sup>, to discuss this position statement and matters of significance to Ngāi Tahu before any final decisions are made by the Minister. Ngāi Tahu invites the Minister to Te Tai Poutini for this engagement.
86. Ngāi Tahu is committed to working with the Minister and the Department to support final decisions and the further policy work signalled in the section 49 Report.

### **APPENDICES**

Refer to separate document.

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<sup>22</sup> Agreement - Stewardship Land Reclassification Western South Island, Te Tai Poutini, December 2024, Schedule, Clause 4.1



**Te Rūnanga o Ngāi Tahu Position Statement  
Stewardship Land Reclassification – Te Tai Poutini**

**21 March 2025**

**Appendices**

## Appendix 1 – Tarahanga e Toru Historic Reserve

**Table 1.1 – Tarahanga e Toru Historic Reserve**

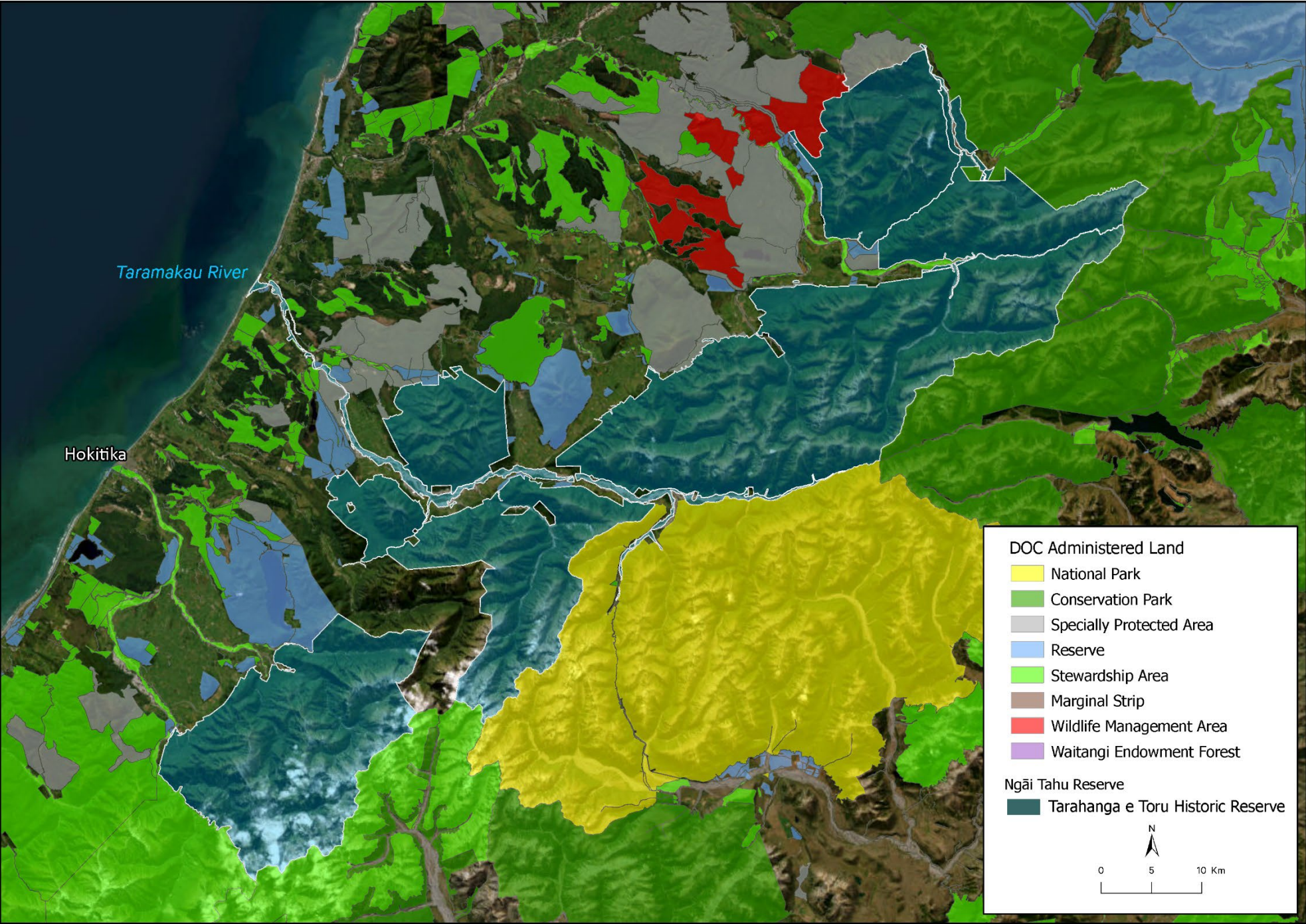
181,381 Hectares

Reference	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
HOK_01	2809263	409.47	Taramakau Riverbed	Historic Reserve (Tarahanga e Toru)	Proceed	Agree	The areas contained within the proposed Tarahanga e Toru Historic Reserve are at the heart of Poutini Ngāi Tahu legends, customs and traditions centred around pounamu. Ngāi Tahu connections with the area include ara tawhito, passes used to link the east and west coasts, tohu whenua, mahinga kai resources that supported pā, nohoanga and travellers, and legends and battles associated with pounamu.	<b>Proceed</b> with Historic Reserve and implement immediately.
HOK_01	2809268	31.08	Kumara - Wardens Road	Historic Reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
HOK_03	2806316	3779.94	Taramakau River / Ōtira River	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
HOK_19	2805713	62098.32	Wanganui / Otira Catchments (Northern two units)	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
HOK_19	2805715	5122.56	Kawhaka Forest	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
HOK_24	2805714	10.21	Wainihinihi Creek	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.

Reference	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
MAW_09	2807465	19153.70	Granville Forest	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_09	2807468	1033.43	Grey River/Māwheranui	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_09	2807469	92.60	Grey River/Māwheranui	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_09	2807512	78872.88	Otira-Kopara Forest	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_09	2807517	105.88	Robinson River	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_09	2807522	11.41	Crane Creek - Haupiri Road	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_09	2954675	81.27	Robinson River	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.
MAW_53	2806524	10578.67	Hōhonu Forest	Historic reserve (Tarahanga e Toru)	Proceed	Agree	See above	<b>Proceed</b> with Historic Reserve and implement immediately.



Map 1.1 – Tarahanga e Toru Historic Reserve





Map 1.2 – Tarahanga e Toru Historic Reserve





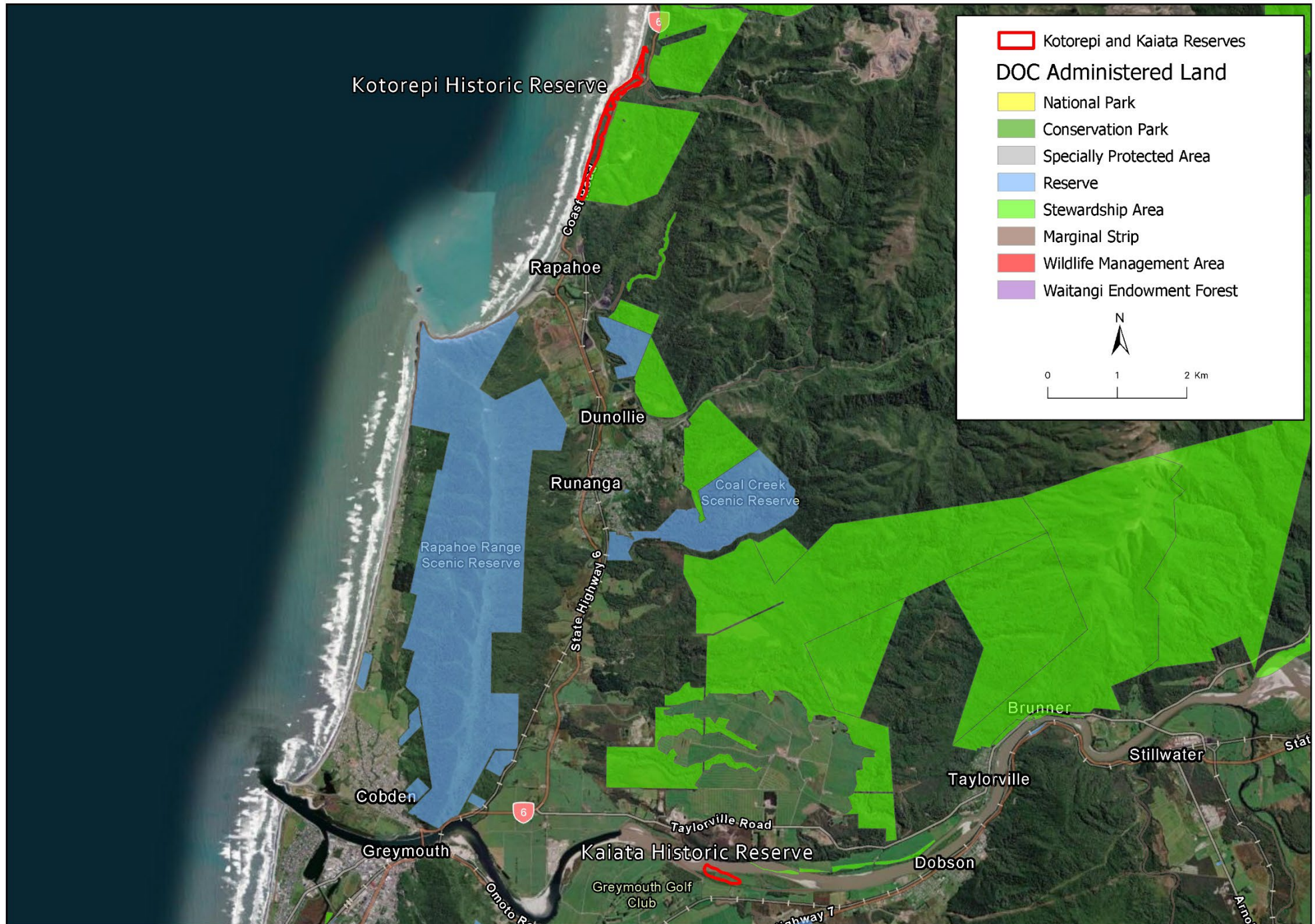
## Appendix 2 – Ngāi Tahu Historic Reserves

**Table 2.1 – Ngāi Tahu Historic Reserves**

35.13 Hectares

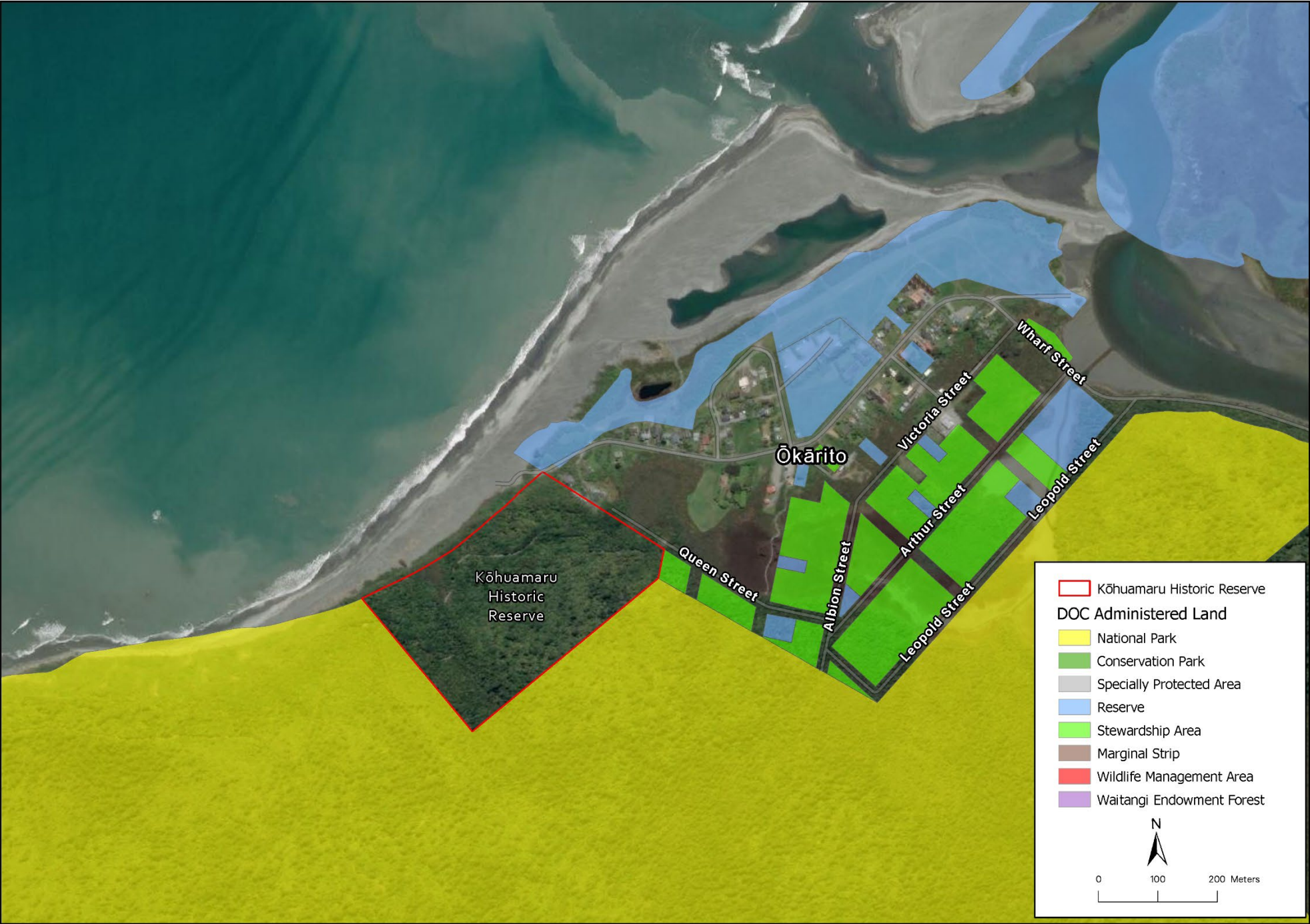
Reference	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
MAW_18	2809253	18.69	Nine Mile Creek/Kotorepi (below the road)	Historic Reserve (Kotorepi)	Proceed	Agree	The area contains a pā site, the landing point for the Tairea Waka and is a vital link to Poutini Ngāi Tahu pounamu legends. There is an ancient (pre-Ngāi Tahu conquest) burial ground immediately adjoining the site.	<b>Proceed</b> with Historic Reserve
MAW_28	2809054	5.60	Grey River/Māwheranui	Historic Reserve (Kaiata)	Proceed	Agree	Kaiata is the place where, after defeating the resident Ngāti Wairangi in a series of conflicts, Ngāi Tahu decided to stay on Te Tai Poutini to consolidate their conquest by occupation. There is Māori Reserve land nearby.	<b>Proceed</b> with Historic Reserve
TWP_24	2805258	10.84	Ōkārito	Historic Reserve (Kōhuamaru)	Proceed	Agree	Ōkārito was one of the largest mana whenua kāika in South Westland. The association with the area is described in the Statutory Acknowledgement in the Ngāi Tahu Claims Settlement Act 1998. Ōkārito was a traditional centre of learning, contains wāhi tapu, pā site and burial ground nearby, presence of kōtuku (taonga species). Nohoanga and mātaimai are in place.	<b>Proceed</b> with Historic Reserve

### Map 2.1 – Ngāi Tahu Historic Reserves





Map 2.2 – Ngāi Tahu Historic Reserves





## Appendix 3 – Ngāi Tahu Local Purpose Reserves

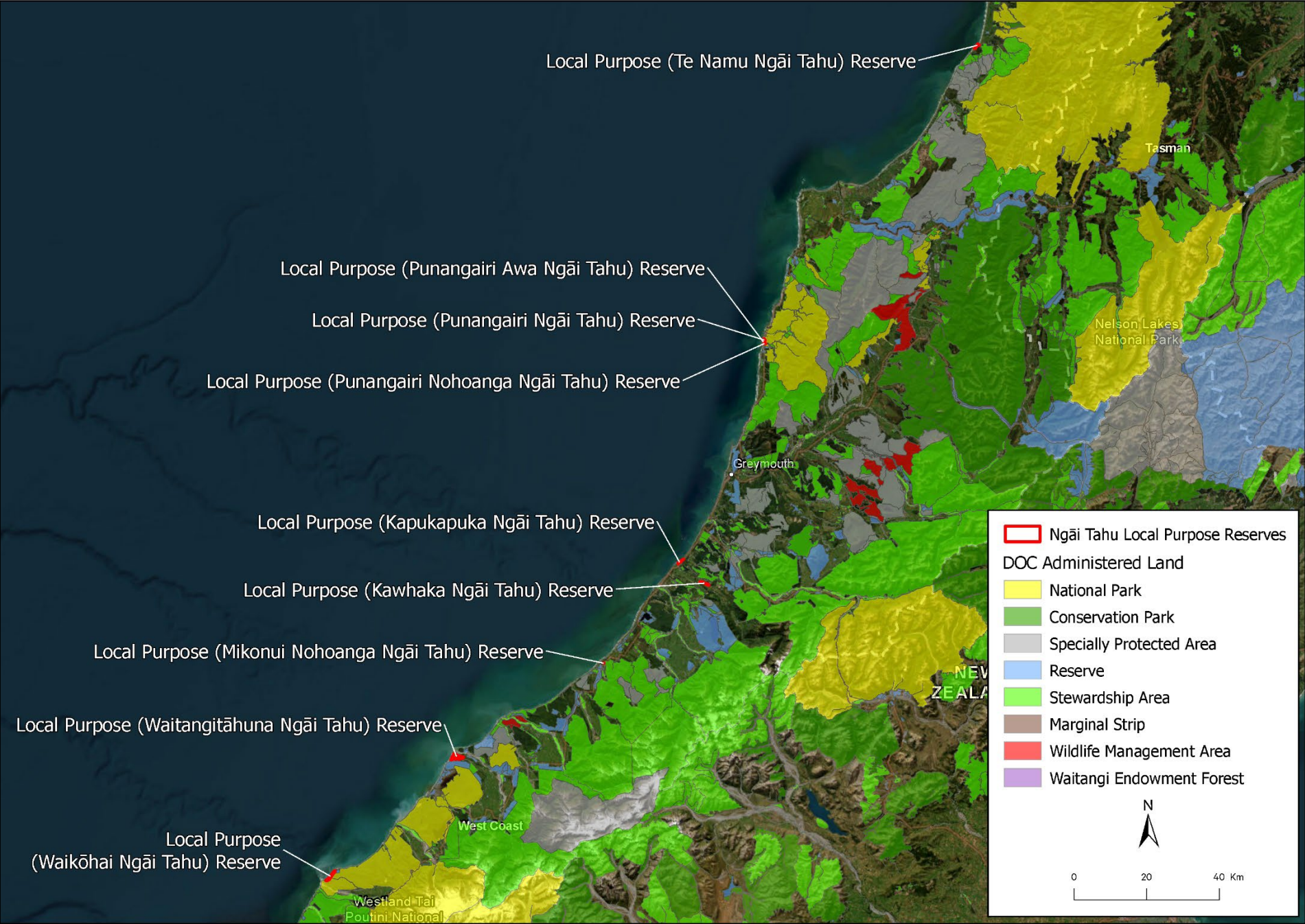
**Table 3.1 – Ngāi Tahu Local Purpose Reserves**

502.26 Hectares

Reference	Napalis	Hectares	Stewardship area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
HOK_08	2809280	22.19	Arahura River Mouth	Local Purpose (Kapukapuka Ngāi Tahu) Reserve	Do not proceed	Agree	Ngāi Tahu connections to the area include the old Arahura pā, pounamu, ara tawhito and mahinga kai. There are Māori reserve lands in the vicinity. Ngāti Waewae have aspirations for restoring and improving the connectivity between the pā, urupā, river and marae.	Direct Department to commence policy work immediately.
HOK_14	2809287	29.67	Kawhaka Creek	Local Purpose (Kawhaka Ngāi Tahu) Reserve	Do not proceed	Agree	The area is valued for pounamu fossicking.	Direct Department to commence policy work immediately.
HOK_44	2805524	0.48	Mikonui River - SH6	Local Purpose (Mikonui Nohoanga Ngāi Tahu) Reserve	Do not proceed	Agree	The area contains a nohoanga site under the Ngāi Tahu Claims Settlement Act 1998.	Direct Department to commence policy work immediately.
KAR_18	2807733	39.65	Little Wanganui River	Local Purpose (Te Namu Ngāi Tahu) Reserve	Do not proceed	Agree	The area contains tohu whenua and was part of Te Tai Poutini coastal trail.	Direct Department to commence policy work immediately.
PAP_11	2806888	16.7077	Punakaiki - Coast Road (North)	Local Purpose (Punangairi Ngāi Tahu) Reserve	Do not proceed	Agree	The Paparoa area is significant in tribal history and values include mahinga kai and ara tawhito. Ngāti Waewae have established the new visitor centre.	Direct Department to commence policy work immediately.
PAP_12	2806889	0.2842	Punakaiki River (River Mouth)	Local Purpose (Punangairi Awa Ngāi Tahu) Reserve	Do not proceed	Agree	The Paparoa area is significant in tribal history and values include mahinga kai and ara tawhito.	Direct Department to commence policy work immediately.
PAP_13	2806890	3.6728	Punakaiki River	Local Purpose (Punangairi Nohoanga Ngāi Tahu) Reserve	Do not proceed	Agree	The Paparoa area is significant in tribal history and values include mahinga kai and ara tawhito. The area also contains a nohoanga	Direct Department to commence policy work immediately.

Reference	Napalis	Hectares	Stewardship area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
							site under the Ngāi Tahu Claims Settlement Act 1998.	
TWP_15	2805256	277.2646	Waitangitāhuna River Mouth	Local Purpose (Waitangitāhuna Ngāi Tahu) Reserve	Do not proceed	Agree	There is a historic pā and occupation site in the vicinity. The area is valued for mahinga kai and is surrounded by Māori reserve land.	Direct Department to commence policy work immediately.
TWP_31	2805316	112.3469	Gillespies Beach	Local Purpose (Waikōhai Ngāi Tahu) Reserve	Do not proceed	Agree	The area has historic occupation sites, urupā and mahinga kai sites. There are Māori reserve lands in the vicinity. The visual connection to the maunga tīpuna of Aoraki is important.	Direct Department to commence policy work immediately.
TWP_40	2800943	2.7347	Haast Visitor Centre	Local Purpose (Awarua Ngāi Tahu) Reserve	Do not proceed	Agree	Ngāi Tahu does not have an interest in the visitor centre this time.	Ngāi Tahu no longer seeks a local purpose reserve for this area.

Map 3.1 – Ngāi Tahu Local Purpose Reserves



## Appendix 4 – Additional Significant Ngāi Tahu Whenua

**Table 4.1 – Additional Significant Ngāi Tahu Whenua**

291.24 Hectares

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
KAR_07	2807692	12.39	Karamea Riverbed	Wildlife Management Area	Do not proceed	Agree	There is an old pā site and Māori owned land in the vicinity.	<b>Do not proceed</b> with Wildlife Management Area, retain as stewardship land
KAW_02	2807751	0.86	Burkes Creek	Stewardship	Proceed	Agree	There are Māori reserve lands in the vicinity that are included as ‘Site and Area of Significance to Māori’ under Te Tai Poutini Plan – SASM 8.	<b>Proceed</b> with notified proposal to retain as stewardship land.
HOK_11	2806208	74.46	North Bank Arahura Road	Stewardship	Proceed	Agree	Future papakāinga next to Arahura marae. This area is included in the listed projects under the Fast-Track Approvals Act 2024.	<b>Proceed</b> with notified proposal to retain as stewardship land.
HOK_33	2805698	203.04	Butlers (between Butlers Road and Woodstock-Rimu Road)	Conservation Park	Do not proceed	Agree	The stewardship area is significant as it provides access to Lake Mahināpua. The lake is wāhi tapu and the lakebed is vested to Te Rūnanga o Ngāi Tahu.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land
TWP_37	2804995	0.1379	Jacobs River	Stewardship	Proceed	Agree	Ngāi Tahu seek to continue discussions regarding disposal to mana whenua for papatipu rūnanga purposes.	<b>Proceed</b> with notified proposal to retain as stewardship land.
TWP_37	2804996	0.2086	Jacobs River	Stewardship	Proceed	Agree	Ngāi Tahu seek to discuss further potential for addition to adjacent Māori reserve.	<b>Proceed</b> with notified proposal to retain as stewardship land.
TWP_47	2801484	0.1452	Neils Beach	Stewardship	Proceed	Agree	Ngāi Tahu seek to discuss further addition to adjacent Māori reserve.	<b>Proceed</b> with notified proposal to retain as stewardship land.

## Appendix 5 – Ngāi Tahu Specific Interests – Notified proposals to remain as stewardship land

**Table 5.1 – Ngāi Tahu Specific Interests – Notified proposals to remain as stewardship land**

7850.74 Hectares

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
MAW_12	2806493	2417.20	Callaghans Creek	Stewardship	Proceed	Agree	Ngāi Tahu interests relate to forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Proceed</b> with notified proposal to retain as stewardship land.
MAW_33	2806985	4208.31	Blackwater Creek - Souters Creek	Stewardship	Proceed	Agree	See above.	<b>Proceed</b> with notified proposal to retain as stewardship land.
MAW_43	2806989	1225.23	Cockeye Creek - Cockabulla Creek	Stewardship	Proceed	Agree	Ngāi Tahu interests relate to pounamu, forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Proceed</b> with notified proposal to retain as stewardship land.

\*Refer to Map 6.1



## Appendix 6 – Ngāi Tahu Specific Interests - Additional areas sought to remain as stewardship land

**Table 6.1 – Ngāi Tahu Specific Interests - Additional areas sought to remain as stewardship land**

6596.89 Hectares

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
HOK_04	2809265	873.59	Kapitea Creek	Conservation Park	Proceed	Disagree	Ngāi Tahu interests relate to pounamu, forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_04	2809278	181.65	Chesterfield	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_05	2809266	216.40	Kumara Straight	Conservation Park	Proceed	Disagree	Ngāi Tahu interests relate to forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_05	2809275	290.00	Dillmanstown	Conservation Park	Proceed	Disagree and Neutral	See above.  This does not apply to the parcels immediately adjacent to the State Highway, where the Ngāi Tahu position is neutral.	<b>Do not proceed</b> with Conservation Park for all parcels adjoining Ngāi Tahu Forestry, retain as stewardship land.  The exceptions are the parcels immediately adjacent to the State Highway where Ngāi Tahu are neutral on the decision to proceed or not.

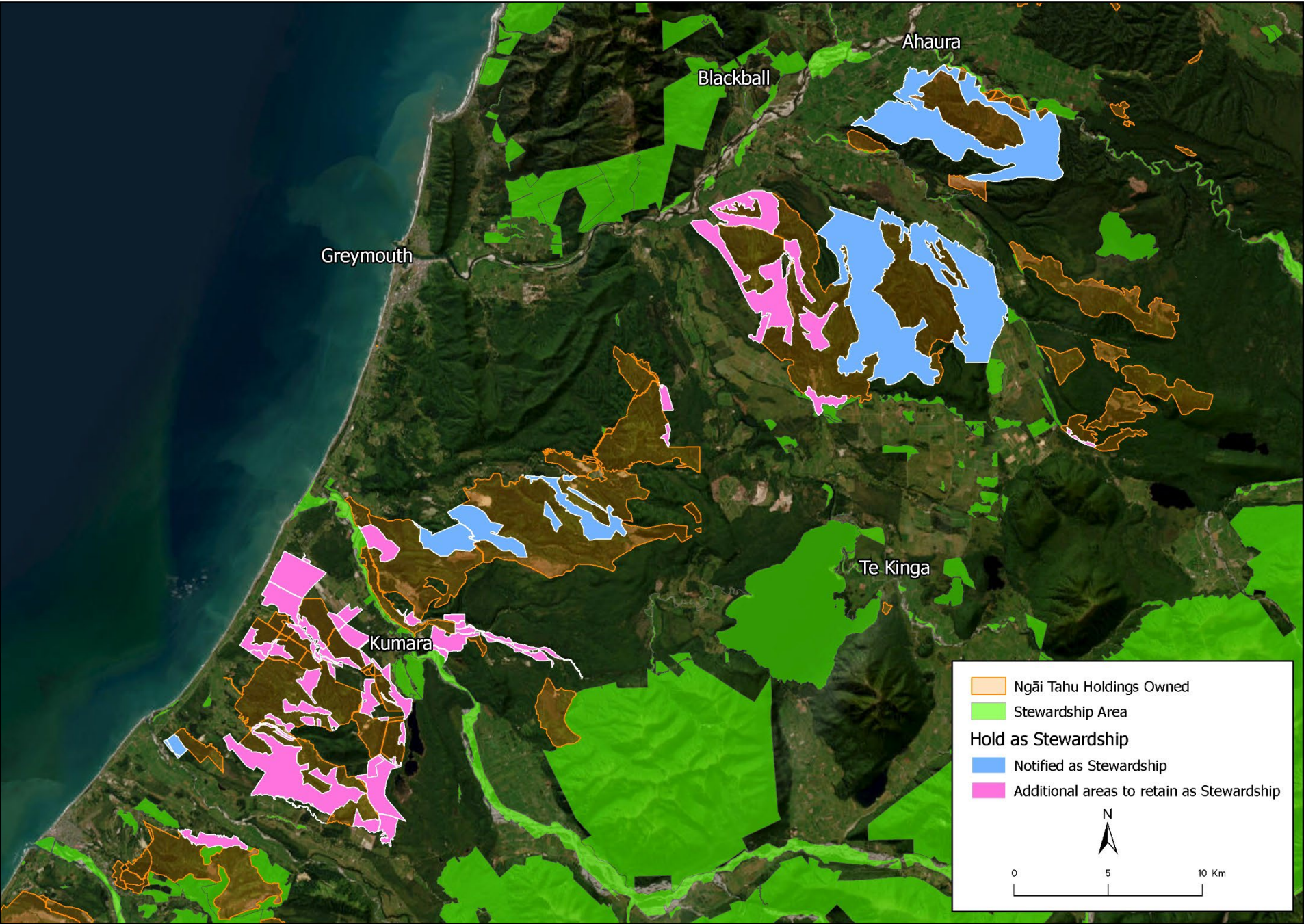
Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
HOK_05	2809334	3.80	Kumara Straight	Conservation Park	Proceed	Disagree	Ngāi Tahu interests relate to forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_06	2806209	289.00	German Gully	Conservation Park	Proceed	Disagree	Ngāi Tahu interests relate to pounamu, forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_10	2809285	1206.80	Big Dam Hill	Conservation Park	Proceed	Disagree	Ngāi Tahu interests relate to forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_12	2809283	55.66	Duffers Creek	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_12	2809288	500.86	Lake Mudgie	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
HOK_18	2805688	168.56	Blue Spur Road	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
MAW_34	2806525	61.67	Bell Hill Farm	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
MAW_34	2806986	1673.17	Ongionui Creek	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
MAW_36	2806987	87.18	Māori Gully Creek	Scenic Reserve (b)	Proceed	Disagree	See above.	<b>Do not proceed</b> with Scenic Reserve, retain as stewardship land.
MAW_37	2806530	23.00	Bell Hill	Wildlife Management Area	Proceed	Disagree in part	Ngāi Tahu interests are in the parcel adjacent to Haupiri Road, and relate to forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Wildlife Management Area for parcel adjacent to Haupiri Road, retain as stewardship land.  <b>Proceed</b> with notified proposal of Wildlife Management Area for remaining parcels.
MAW_43	2806207	195.09	Fireball Creek	Conservation Park	Proceed	Disagree	Ngāi Tahu interests relate to pounamu, forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
MAW_54	2805814	36.98	Greenstone River/Hokonui	Historic Reserve	Proceed	Disagree	Ngāi Tahu has pounamu interests in this area. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Historic Reserve, retain as stewardship land.
MAW_54	2809291	207.07	Greenstone River/Hokonui	Historic Reserve	Proceed	Disagree	See above.	<b>Do not proceed</b> with Historic Reserve, retain as stewardship land.
MAW_55	2809290	200.51	Paynes Gully Road	Historic Reserve	Proceed	Disagree	See above.	<b>Do not proceed</b> with Historic Reserve, retain as stewardship land.
MAW_56	2809294	38.47	Cape Terrace	Historic Reserve	Proceed	Disagree	See above.	<b>Do not proceed</b> with Historic Reserve, retain as stewardship land.



Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
TWP_04	2809717	287.4254	Duffers Creek	Scenic Reserve	Proceed	Disagree	Ngāi Tahu interests relate to forestry, climate change mitigation and/or afforestation opportunities. Further section 4 assessment of the values and opportunities of this whenua for Ngāi Tahu is required.	<b>Do not proceed</b> with Scenic Reserve, retain as stewardship land.

Map 6.1 – Ngāi Tahu Specific Interests – Notified proposals to remain as stewardship and additional areas sought to remain as stewardship



## Appendix 7 – Central and Local Government Priorities

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
INA_15	2807891	4.3315	Boatman Creek	Conservation Park	Proceed	Disagree	Future opportunities for West Coast region relating to critical minerals.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
INA_15	2807892	52.4397	Boatman Creek - Caplestone	Conservation Park	Proceed	Disagree	Future opportunities for West Coast region relating to critical minerals.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAR_05	2807689	0.10	Karamea	Government Purpose (Government Buildings) reserve	Proceed	Disagree	Future opportunities for the Crown.	<b>Do not proceed</b> with Government Purpose (Government Buildings) Reserve, retain as stewardship land.
KAR_05	2807712	0.09	Karamea - Waverley Street	Government Purpose (Government Buildings) reserve	Proceed	Disagree	Future opportunities for the Crown.	<b>Do not proceed</b> with Government Purpose (Government Buildings) Reserve, retain as stewardship land.
KAW_08	2807744	345.79	Stockton	Conservation Park	Proceed	Disagree	Future opportunities for the West Coast region relating to critical minerals. In the vicinity of land being considered for mine remediation by government agencies, therefore reclassification should not occur at this time. Note this is also in the vicinity of area included in the listed projects under the Fast-Track Approvals Act 2024.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_08	2807745	57.27	Millerton	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
KAW_08	2807781	2.01	Stockton	Conservation Park	Proceed	Disagree	Future opportunities for the West Coast region relating to climate change mitigation. In the vicinity of land being considered for mine remediation by government agencies, therefore reclassification should not occur at this time. Note this is also in the vicinity of area included in the listed projects under the Fast-Track Approvals Act 2024.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_09	2807757	15.79	Millerton Township	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_10	2807805	3764.27	Waimangaroa - Granity	Conservation Park	Proceed	Disagree	Future opportunities for the West Coast region relating to critical minerals. In the vicinity of land being considered for mine remediation by government agencies, therefore reclassification should not occur at this time. Note this is also in the vicinity of area included in the listed projects under the Fast-Track Approvals Act 2024.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_11	2807807	1206.12	Plover Stream	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_11	2807860	8.98	Isolated Hill	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_17	2807866	0.57	Old Denniston School Site	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_17	2808235	7539.17	Mount Rochfort	Conservation Park	Proceed	Disagree	See above.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.



Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
KAW_26	2808247	903.31	Ballarat (Central & Northern Land Units)	Conservation Park	Proceed	Disagree	Future opportunities for the West Coast region relating to critical minerals.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_26	2808247	903.31	Ballarat (Southern Land Unit)	Conservation Park	Proceed	Disagree	Future opportunities for the West Coast region relating to critical minerals.	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.
KAW_29	2808256	55.09	Pakihi Road	Local Purpose (Rifle Range) Reserve	Proceed	Disagree	Future opportunities for the West Coast region relating to climate change mitigation.	<b>Do not proceed</b> with Local Purpose (Rifle Range) Reserve, retain as stewardship land.
MAW_27	2806809	897.97	Mcleans Creek	Scenic Reserve	Proceed	Disagree	Future opportunities for the West Coast region relating to local government infrastructure.	<b>Do not proceed</b> with Scenic Reserve, retain as stewardship land.
PAP_19	2806887	0.2842	Punakaiki Field Centre	Government Purpose (Government Buildings) Reserve	Proceed	Disagree	Future opportunities for the Crown.	<b>Do not proceed</b> with Government Purpose (Government Buildings) Reserve, retain as stewardship land.
TWP_27	2805315	2.2438	Waiho Gorge (Buildings)	Government Purpose (Government Buildings) Reserve	Proceed	Disagree	Future opportunities for the Crown.	<b>Do not proceed</b> with Government Purpose (Government Buildings) Reserve, retain as stewardship land.
TWP_33	2805321	0.062	Pekanga Drive	Government Purpose (Government Buildings) Reserve	Proceed	Disagree	Future opportunities for the Crown.	<b>Do not proceed</b> with Government Purpose (Government Buildings) Reserve, retain as stewardship land.
TWP_33	2805322	0.1013	Pekanga Drive	Government Purpose	Proceed	Disagree	Future opportunities for the Crown.	<b>Do not proceed</b> with Government Purpose (Government Buildings)

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
				(Government Buildings) Reserve				Reserve, retain as stewardship land.
HOK_52	2805641	2805641	Waitaha Forest	Conservation Park	Do not proceed	Agree	<p>This area is required for renewable energy. The land is included in the listed projects under the Fast-Track Approvals Act 2024.</p> <p>Although Ngāi Tahu agrees with the section 49 recommendation to not proceed, Ngāi Tahu does not agree with the rationale in the section 49 Report.</p>	<b>Do not proceed</b> with Conservation Park, retain as stewardship land.

## Appendix 8 – Appropriate Classification

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
HOK_01	280929	1.16	Kumara - Cashman Street	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280920	0.15	Kumara - Town Belt North	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280921	0.30	Kumara - Cashman Street	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280922	3.99	Kumara - Town Belt North	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280923	29.91	Kumara - Town Belt North	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280924	0.65	Kumara	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280932	3.37	Greymouth - Kumara Tramway	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_01	280933	0.10	Kumara - Cashman Street	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_09	280921	2.70	Stafford	Conservation Park	Proceed In Part	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_19	280572	16.73	Kokatahi Riverbed	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
HOK_19	280573	27976.4	Wanganui /Otira Catchments (South)	Conservation Park	Do not proceed	Disagree	Notified proposal appropriate	<b>Proceed</b> with Conservation Park.
KAW_05	280770	1.27	Seddonville Tramline	Disposal	Do Not Proceed	Disagree	Notified proposal appropriate.	<b>Proceed</b> with notified proposal to consider disposal.
KAW_37	280827	0.36	Charleston- Cemetery Road	Scenic Reserve	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Scenic Reserve.
KAW_37	280827	0.19	Charleston - Cemetery Road	Scenic Reserve	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Scenic Reserve.

Area	Napalis	Hectares	Stewardship Area	Notified Proposal	S49 Report	Ngāi Tahu Position S49 Report	Ngāi Tahu Values and Interests	Ngāi Tahu Position
KAW_43	280825	2.23	Buller River Estuary	Disposal	Do Not Proceed	Disagree	Notified proposal appropriate.	<b>Proceed</b> with notified proposal to consider disposal.
MAW_24	280674	3.18	Paparoa Street - Roa	Scenic Reserve	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Scenic Reserve.
MAW_33	280685	10.60	Kangaroo Creek (Forested Area)	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
MAW_33	280685	10.60	Kangaroo Creek (Pasture)	Conservation Park	Proceed	Disagree	Inappropriate classification for values.	<b>Do not proceed</b> with Conservation Park.
TWP_05	280965	53834.8	Waitangi Forest (East)	Conservation Park	Do not proceed	Disagree	Notified proposal appropriate.	<b>Proceed</b> with Conservation Park.