

Fast-track Approvals Bill 2024

Climate Justice Taranaki submission, 19 April 2024

Introduction

1. Climate Justice Taranaki (CJT)¹ is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will increasingly impact present and future generations' inalienable rights to safe water, food, and shelter, crucial to sustaining livelihoods and quality of life. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions.
2. CJT has submitted on various consultation papers, policies and Bills over the past decade. Of most relevance to the Fast-track Approvals Bill² was our June 2020 submission on the Covid-19 Recovery (Fast-track Consenting) Bill which we were opposed to³. More recently in November 2023, we voiced our concern over fast-tracking in our submission to the Ministry for Business, Innovation and Employment (MBIE) on Energy Transition⁴. Earlier this month, we reiterated our concern over potential fast-track approvals for Roads of National Significance in our submission on the Government Policy Statement on Land Transport⁵.
3. This submission expresses our absolute opposition to the Fast-track Approvals Bill (hereon referred to as the Bill), with sentiment and rationale shared by an overwhelming number of scientific⁶, environmental, law and social justice organisations and individuals in Aotearoa New Zealand. More specifically, please read our submission as an extension to those by the Environment Defence Society and Forest and Bird, as we fully agree with the points raised in their submissions.
4. CJT urges the Environment Select Committee to recommend that it does not proceed through further stages in Parliament.

An attack on environmental safeguards and a safe climate

5. The omnibus Bill overrides a suite of key legislation that otherwise protects the environment and species within it, including ourselves. These include the Resource Management Act 1991 (RMA), Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953 and the Crown Minerals Act (CMA) 1991⁷ (see schedules 5, 6, 10 of the Bill). New Zealand has some of the worst extinction rates on the planet. Every piece of conservation land, irrespective of its current status or ownership, must be safeguarded for ecosystem restoration, rather than opened for fast-track approvals to enable supposed "*significant regional or national benefits*". Notably, section 18(h) of the Bill on ineligible projects opens up Crown owned conservation land and the Coromandel Peninsula and its internal waters for fast-track approval considerations⁸, by excluding Schedule 4 clauses 12 and 13 of the CMA. The deliberate allowance for prohibited activities under the RMA to be eligible for fast-track approvals consideration is a blatant attack on safeguards for the environment and public health and safety (section 17(5)).
6. The inclusion of minerals and petroleum mining as one of the eligibility criteria (section 17(3)(f) for projects that may be fast tracked is extremely alarming. All credible international science academies and agencies have ruled out fossil fuel development if we are to avert the worst of climate catastrophes.

¹ <https://climatejusticetaranaki.info/>

² https://legislation.govt.nz/bill/government/2024/0031/latest/LMS943195.html?search=ts_act%40bill%40regulation%40deemedreg_fast_resel_25_a&p=1

³ <https://climatejusticetaranaki.info/wp-content/uploads/2020/06/cjt-submission-covid-19-fast-track-bill-21jun20-final.pdf>

⁴ <https://climatejusticetaranaki.info/wp-content/uploads/2023/11/cjt-sub-mbie-energy-transition-nov23-final.pdf>

⁵ https://climatejusticetaranaki.info/wp-content/uploads/2024/04/cjt-sub-gps-land-transport-2024_34-2apr24-final.pdf

⁶ <https://newzealandecology.org/sites/default/files/Open%20letter%20to%20the%20Coalition%20government%20from%20scientific%20societies%2013%20March%202024.pdf>

⁷ https://legislation.govt.nz/act/public/1991/0070/latest/DLM242536.html?search=sw_096be8ed81e242c4_conservation_25_se&p=1#DLM247378

⁸ https://www.parliament.nz/en/pb/order-paper-questions/written-questions/document/WQ_05159_2024/5159-2024-hon-rachel-brooking-to-the-minister-responsible

Rather than fast-tracking coal and petroleum exploration and mining, and amending the RMA to “reduce barriers” and cut “red tape” for coal mining⁹, these need to be banned. CJT has long called for no more exploration and drilling for oil and gas, not just offshore but onshore in Taranaki and the rest of the country. Any perceived future regional or national ‘benefits’ from fossil fuels have already been countered by the financial, social and ecological costs of extreme weather events, both on land and at sea. Indeed, the fossil fuel industry has an enormous unpaid debt to society, growing rapidly. Climate disruptions, sea level rise, ocean acidification and deoxygenation and ubiquitous plastic pollution will continue, an increasingly ‘fast-tracked’ calamity for humanity and our co-inhabitants here on Earth.

7. All mining is environmentally destructive and requires fossil fuels. Notably, seabed mining for minerals, even so-called ‘critical minerals’ for renewable energy, is destructive. Rather than fast-tracking mineral development, it needs to be banned or at least subject to thorough, evidence-based assessment and community inputs. It is beyond comprehension that the Trans-Tasman Resources’ seabed mining application, having been turned down by multiple courts¹⁰, has been invited by the Infrastructure Minister to apply for a fast-track approval¹¹, as has the Chatham Rock Phosphate Ltd.¹² even before this Bill is passed into legislation. CJT continues to argue that the cumulative effects of the proposed seabed mining activities along with the existing and future effects from other activities, have not been properly assessed. Furthermore, considering the fast-changing ocean conditions, notably extended marine heatwaves and changing ocean chemistry undermining ocean food webs, the plight of our threatened and endangered marine species is dire¹³, even without additional manmade impacts from seabed mining or such like.
8. Mineral and petroleum mining have left toxic legacies the world over, including in New Zealand¹⁴. CJT has long pushed for the requirement of significant bonds should mining consents be granted, to ensure that companies pay for the decommissioning and remediation of sites. The saga of Tamarind Taranaki deserting the Tui oil field in 2019, leaving behind a half a billion-dollar decommissioning bill must not be repeated¹⁵. Any fast-tracked mining approvals, if ever allowed, must come with the most stringent requirements for environmental protection, health and safety of neighbours, proper decommissioning and site remediation.

An attack on democracy and disrespect for Te Tiriti o Waitangi

9. The concentration of decision-making power on three Ministers is extremely undemocratic. It also opens the door even further for collusion, via industry lobbying and regulatory capture. The six-people Advisory Panel charged to advise Ministers on potential fast-track projects for Schedule 2A of the Bill includes a Sanford fishing executive, an infrastructure company director and an ex-forestry manager¹⁶. Is New Zealand a ‘corporate kleptocracy’?
10. The Bill removes nearly all public involvement in decisions over significant projects with potentially adverse impacts on local communities, the environment, indigenous species and sites of important conservation values both on land and at sea. Appeals can only be made on a question of law.

⁹ <https://www.scoop.co.nz/stories/PA2404/S00096/rma-changes-to-cut-coal-mining-consent-red-tape.htm>

¹⁰ <https://www.kasm.org.nz/post/ttr-abandons-seabed-mining-application-kasm-labels-it-a-cowardly-move-to-get-onto-fast-track>

¹¹ <https://www.manukaresources.com.au/site/pdf/a1409ad6-23ed-483d-9da2-2d0b52072f6b/Taranaki-Project-invited-to-apply-under-NZ-Fast-Track-Bill.pdf>

¹² <http://nzx-prod-s7fsd7f98s.s3-website-ap-southeast-2.amazonaws.com/attachments/CRP/429367/416522.pdf>

¹³ <https://climatejusticetaranaki.info/wp-content/uploads/2023/10/cjt-submission-ttr-eez-cs-act-application-6oct23-1.pdf>

¹⁴ <https://www.greenpeace.org/aotearoa/story/the-governments-fast-track-approvals-bill-is-a-race-to-the-bottom/>

¹⁵ <https://www.rnz.co.nz/news/business/511110/nearly-half-a-billion-taxpayer-dollars-set-aside-to-decommission-tui-oil-field>

¹⁶ [https://www.rnz.co.nz/news/political/513908/ministers-announce-advisory-group-for-fast-tracking-](https://www.rnz.co.nz/news/political/513908/ministers-announce-advisory-group-for-fast-tracking-projects?fbclid=IwAR0UByoLA3VuKAKSTYD3-WtiXrMlfsPG4ONG-Dj-)

[projects?fbclid=IwAR0UByoLA3VuKAKSTYD3-WtiXrMlfsPG4ONG-Dj-2m2Xl1SrTGBMY6k7aEi_aem_AZvmXJlhZoXwT8KqTNq95l7Eb_8FP1bwRwQu13l4ftlBUy7uz75tl3C-c2tpAS6uwWNinaUmyG5CwD_CijknDK](https://www.rnz.co.nz/news/political/513908/ministers-announce-advisory-group-for-fast-tracking-projects?fbclid=IwAR0UByoLA3VuKAKSTYD3-WtiXrMlfsPG4ONG-Dj-2m2Xl1SrTGBMY6k7aEi_aem_AZvmXJlhZoXwT8KqTNq95l7Eb_8FP1bwRwQu13l4ftlBUy7uz75tl3C-c2tpAS6uwWNinaUmyG5CwD_CijknDK)

11. The Bill fails to embed the constitutional obligation to honour Te Tiriti o Waitangi and breaches the UN Declaration on the Rights of Indigenous Peoples¹⁷ (See Annex 1 at the end of our submission)¹⁸.

Threats to public health and safety

12. We are concerned that waste to energy incineration proposals¹⁹ could be fast-tracked, resulting in greenhouse gas emissions and pollution that could cause harm on local communities, and jeopardise zero waste efforts. Like any hazardous facilities, there are also serious and complex health and safety issues that need to be carefully assessed by multi-disciplinary experts, as with hydrogen production, storage, transportation, distribution and refuelling. The Ministry for the Environment's guidance for fast-track applicants touches lightly on the adverse effects on the environment only' and nothing about health and safety^{20, 21}.
13. Lessons should be learnt from Taranaki where health and safety of communities are, to a large extent, safeguarded by the RMA required district council plans²², plan rules²³ on activities and safety setbacks between homes and hazardous facilities such as oil and gas wellsites and production stations. Section 17(3)(j) of the Bill on eligibility criteria stipulates that the joint Ministers "may" consider whether the project is consistent with local or regional planning documents, including spatial strategies, rather than "must". The safety setback was added to the South Taranaki District Plan²⁴ and New Plymouth District Plan²⁵ to minimise fatality and injury risks of the public, after years of legal battle brought about by Taranaki Energy Watch²⁶, an environmental NGO, with its team of expert witnesses, planners and lawyers. This is just one of many cases that clearly show how valuable local knowledge, expertise and inputs are in decisions around the development of potentially harmful activities.
14. Critically, WorkSafe warns²⁷, "*Given the harm that could be caused if an MHF [Major Hazardous Facility] fails to control risks, territorial authorities have duties as a Person Conducting a Business or Undertaking (PCBU) under HSWA [Health and Safety at Work Act] to consider the presence and location of a MHF in their planning decisions.*" It is reckless of the government to override the RMA, council plans and territorial authorities while stripping away public participation.

Lacks evidence-based considerations

15. Section 17(3)(g) of the Bill lists "*climate change mitigation*" as one of the eligibility criteria when considering "*whether the project would have significant regional or national benefits*". Of course, CJT supports greater efforts and investments in climate change mitigation. Our concern is that the fast-track approval process, with decisions made by Ministers, would lose the evidence-based foundation required to properly assess the environmental, social and economic impacts, viability and sustainability of the projects. Any damaging or unviable projects would squander precious time and resources that are much needed for effective action and make things worse.
16. Taranaki has had two projects supported through the Covid-19 Recovery (Fast-track Consenting) Act 2020 and stimulation funding, neither has been successful to this date. The first project resulted in a budget

¹⁷ <https://www.ohchr.org/en/indigenous-peoples/un-declaration-rights-indigenous-peoples>

¹⁸ Fast-track Approvals Bill Te Tiriti o Waitangi Briefing, written by India Logan-Riley for 350 Aotearoa (April 2024).

¹⁹ <https://zerowaste.co.nz/te-awamutu-waste-to-energy-incinerator/>

²⁰ <https://consult.environment.govt.nz/resource-management/fast-track-consenting/>

²¹ https://consult.environment.govt.nz/resource-management/fast-track-consenting/user_uploads/fast-track-approvals-bill---listed-projects---guidance-for-applicants.pdf

²² <https://www.southtaranaki.com/repository/libraries/id:27mlbegko1cxbyf94es5/hierarchy/Documents/District%20Plan/District%20Plan%202015/Sections/Section%202%20Objectives%20and%20Policies.pdf>

²³ <https://www.southtaranaki.com/repository/libraries/id:27mlbegko1cxbyf94es5/hierarchy/Documents/District%20Plan/District%20Plan%202015/Sections/Section%2012%20Hazardous%20Substances%20Rules.pdf>

²⁴ <https://www.southtaranaki.com/our-council/plans-strategies-and-reports/district-plan/minimum-setbacks>

²⁵ <https://proposeddistrictplan.npdc.govt.nz/decisions/>

²⁶ <https://www.rnz.co.nz/news/national/428392/energy-watchdog-wins-court-battle-for-safety-buffer-zones>

²⁷ <https://www.worksafe.govt.nz/topic-and-industry/major-hazard-facilities/information-for-territorial-authorities/>

blowout of \$40 million for the planned replacement of the thermal dryer at the New Plymouth Wastewater Treatment Plant with one that could use a blend of hydrogen and fossil gas. New Plymouth council management admitted²⁸ *“the rush to secure \$37m from the Government’s Covid-19 infrastructure spend in 2020 resulted in the project not having the “level of review” it normally would”*.

17. In 2021, Hiringa Energy and Ballance Agri-Nutrients applied for consents to set up a ‘green hydrogen’ hub in Kapuni, including infrastructure for hydrogen production and four onshore wind turbines. The plan is to use ‘green hydrogen’ to replace a small amount of the fossil gas used in the Ballance Agri-Nutrients ammonia-urea fertiliser plant. The project has been strongly opposed by CJT²⁹, Greenpeace³⁰ and local hapū for the greenwashing and cultural impacts. Synthetic fertilisers like urea fuel and prolong the harms of industrial agriculture on our climate, our waterways, and the welfare of our farmers and animals. Once applied to land, the urea fertiliser, whether it is derived from fossil gas or ‘green’ hydrogen, will result in nitrous oxide emissions to the air and nitrogen pollution in our surface and groundwater. The seven-fold increase in urea use and doubling of the national dairy herd since the 1990s have already caused enormous damage to our freshwater, exposing rural communities to increased health risks associated with elevated nitrate levels in drinking water³¹. Likewise, we are concerned that fast-tracking large-scaled irrigation schemes would result in further expansion and/or intensification of animal agriculture and the associated harm to people, the environment and climate.
18. The creation of a hydrogen economy and Power to X require vastly over-building renewable energy capacity, notably offshore wind energy generation. Our concerns over large-scale offshore wind energy development have been well laid out in our various submissions³², ³³ and in our presentation at the recent Ara Ake Offshore Renewable Energy Forum³⁴. The issues are complex and far-reaching, way beyond what a Fast-track approvals process could possibly consider and assess properly. At the forum, several developers signalled that they would take time to work with hapū, iwi and communities on the issues rather than risk losing the social licence to operate by rushing. Likewise for the government, the wise and responsible way would be to slow down rather than fast-track and to take the precautionary principle when assessing such large-scale development proposals.
19. The proposed Bill is not actually about fast-tracking, but to override evidence-based environmental safeguards and avoid public scrutiny to satisfy power-hungry politicians, developers and generate revenues for big businesses and corporations. Indeed, fast-track approvals are less aimed to “deliver regionally or nationally significant infrastructure” and “significant economic benefits” than to override democracy.
20. To be clear, we are strongly opposed to minerals, coal (e.g. Te Kuha) and petroleum mining, carbon capture, use and storage (CCUS)³⁵ associated with fossil fuel extraction or use, as well as fast-track approvals for aquaculture or irrigation, and any projects that have been rejected in court such as the Ruataniwha dam.

Fast-track investment for community wellbeing and resilience, not economic benefits

21. We are not against all fast-tracking or streamlining of consenting processes, but the focus must be on urgently needed social and environmental projects that contribute to community wellbeing and

²⁸ <https://www.stuff.co.nz/taranaki-daily-news/news/130775383/new-plymouth-ratepayers-face-40m-blowout-on-thermal-dryer-project>

²⁹ <https://climatejusticetaranaki.wordpress.com/2021/10/04/press-release-fast-tracking-hiringa-ballance-kapuni-hydrogen-project-%ef%bf%bc/>

³⁰ <https://www.rnz.co.nz/news/ldr/490410/hapu-and-greenpeace-take-windmills-to-appeal-court>

³¹ https://www.phcc.org.nz/briefing/nitrate-contamination-drinking-water-and-adverse-birth-outcomes-emerging-evidence?fbclid=IwZXh0bgNhZW0CMTAAR2Y9cdvx4mM600gOY0KUvbjOPMVO4vOY5cEeUYzQYsqG4D-FOLEWKppDq8_aem_AQBI-EGWPjUmALpB_bxu10D3UQ4dzViiwqWc49tgC42zBujO4CGq3UyQBNfChRcKFylwxG5AlloKMw33w0fqYo02l

³² <https://climatejusticetaranaki.info/wp-content/uploads/2023/04/cjt-submission-on-mbie-enabling-offshore-renewable-energy-6april23-final.pdf>

³³ <https://climatejusticetaranaki.info/wp-content/uploads/2023/11/cjt-sub-mbie-energy-transition-nov23-final.pdf>

³⁴ <https://climatejusticetaranaki.info/2024/03/24/cjt-presented-at-offshore-renewable-energy-forum/>

³⁵ <https://climatejusticetaranaki.info/2024/03/01/energy-briefing-anything-goes-fast/>

resilience, not on significant infrastructure like new highways³⁶ or to drive economic growth. And final decisions should not be made by Ministers.

22. Economic growth must and will stop because we live on a finite planet within biophysical limits. We simply cannot keep 'growing' by extracting, producing, burning fossil fuels, and wasting energy and materials without getting into deeper trouble. Globally we have overshoot six of the nine planetary boundaries³⁷, beyond which we risk the future of humanity and many of the species we share this planet with. Economic growth is the key driver of these overshoots. To paraphrase Albert Einstein, we cannot fix the problem by continuing with the same approach we used when we created it.
23. Climate change is only one of these overshoots or crises that species including us face. *"We don't know how long we can keep transgressing these key boundaries before combined pressures lead to irreversible change and harm,"* Johan Rockström of the Stockholm Resilience Centre, 2023³⁸. Of the five planetary boundaries assessed in New Zealand, all have been transgressed: climate change, land-system change, biogeochemical cycles (nitrogen and phosphorus use), biosphere integrity (biodiversity loss) and freshwater³⁹.
24. In our view, the way forward is Degrowth⁴⁰ – a planned reduction of energy and material throughput to enable collective wellbeing within ecological limits, i.e. an economy of enough⁴¹. This requires reducing the overall energy and material demand, starting with the most polluting and frivolous, while investing more in what really constitutes wellbeing and resilience. Gross domestic product (GDP) merely measures the size of a nation's economy and does not reflect societal wellbeing⁴². For example, higher crime rates and vehicle crashes raise GDP because more money must be spent to deal with them, yet they are not what healthy societies want. On the contrary, doughnut economics⁴³ and CLEVER (A Collaborative Low Energy Vision for the European Region)⁴⁴ offer valuable vision, rationale, and pathways forward.
25. CJT submits that if fast-track approvals are to be considered, then the priorities ought to be on public services, e.g. large-scale building of energy efficient healthy public housing in already developed areas; accessible and efficient public transport and infrastructure that supports safe walking, cycling, and other modes of active transport; healthcare, education and community-scaled renewable energy systems. Projects to convert large industrial animal farms into integrated systems that produce food, fibre, timber, and fuel for local communities may also be considered.

Conclusion

26. CJT is strongly opposed to the Fast-track Approvals Bill and requests that it be binned.
27. CJT would appreciate the opportunity to speak to its submission at the Select Committee.

³⁶ https://climatejusticetaraki.info/wp-content/uploads/2024/04/cjt-sub-gps-land-transport-2024_34-2apr24-final.pdf

³⁷ <https://www.science.org/doi/10.1126/sciadv.adh2458>

³⁸ <https://www.stockholmresilience.org/research/research-news/2023-09-13-all-planetary-boundaries-mapped-out-for-the-first-time-six-of-nine-crossed.html>

³⁹ <https://environment.govt.nz/publications/a-safe-operating-space-for-new-zealandaotearoa-translating-the-planetary-boundaries-framework/>

⁴⁰ <https://www.degrowth.nz/>

⁴¹ <https://newsroom.co.nz/2023/06/16/the-transition-to-an-economy-of-enough/>

⁴² <https://hbr.org/2019/10/gdp-is-not-a-measure-of-human-well-being>

⁴³ <https://doughnuteconomics.org/about-doughnut-economics>

⁴⁴ https://clever-energy-scenario.eu/wp-content/uploads/2023/10/CLEVER_final-report.pdf

Fast-track Approvals Bill

Te Tiriti o Waitangi Briefing

The Fast-track Approvals Bill is deeply concerning for a variety of reasons. This document focuses specifically on the harm the Bill would have to Te Tiriti o Waitangi and international rights standards of Indigenous Peoples. The Fast-track Approvals Bill attacks Te Tiriti and these standards from several different angles. These are listed below - with implications outlined.

1. The Bill fails to embed the constitutional obligation to honour Te Tiriti o Waitangi
 - a. This is a breach of the Crown's obligations to honour the agreement that was signed in Te Tiriti o Waitangi. Anything less than fully honouring Te Tiriti o Waitangi is a breach of this agreement and does not reflect adequate lawmaking on the part of the Crown.
2. The use of the term 'customary rights'
 - a. The Bill only requires the protection of 'customary rights' (and some parts of Tiriti settlements, with only land returned under Tiriti settlements strictly ring fenced against projects). This is a narrowing of rights already affirmed and protected under Te Tiriti o Waitangi.
 - b. Customary rights, as defined under the Takutai Moana Act, only protects the exercising of certain cultural practices e.g. launching a waka or gathering hāngi stones. This falls far below the Crown's obligation to honour Te Tiriti. Specifically, it fails to fulfill the Crown's obligation to respect tino rangatiratanga of hapū as agreed in Article 2 of Te Tiriti o Waitangi, as well as free, prior and informed consent. Free, prior and informed consent is underscored by the United Nations Declaration on the Rights of Indigenous Peoples, which must be required for any proposed activity applied for under the Bill. Thus, the consistent use of the term 'customary rights' represents a drastic narrowing of Māori rights.
 - c. By failing to respect and uphold tino rangatiratanga o hapū, the Crown is undermining the crucial and valuable role that Mana Whenua have in protecting communities and ecosystems from the harm of these projects.
3. Weak protections for Tiriti settlements, and lack of protections elsewhere
 - a. Although the Bill includes limited protections for settlements -only the land returned in settlements is explicitly protected from the

overriding nature of the Bill in cl 18. Other parts of settlements receive less protection e.g. commercial assets, protection of wāhi tapu and recognition of special interests in areas like lakes or rivers, resulting in an overall weak and limited protection of the settlements.

- b. This also results in next to no protections for hapū who have not settled, adding to an atmosphere of pressure for those hapū and iwi currently in Tiriti settlement negotiations.
4. Expert Panel structure and processes
 - a. The Expert Panel is structured to only have one iwi authority representative, even if multiple iwi authorities are present in the rohe of a proposed activity applied for under the Bill. This represents a major failure to uphold both Te Tiriti and the United Nations Declaration on the Rights of Indigenous Peoples, which affirms the right of Indigenous communities to self-select representation (specifically Article 18) and governance approaches.
 - b. The further breach of both UNDRIP and Te Tiriti o Waitangi is found in the clause (sch 3, s5, ss3) “The relevant Treaty settlement entity or iwi authority may not unreasonably withhold their agreement to a modified arrangement”. This clause specifically targets Māori, overriding iwi authority and self-determination by making tino rangatiratanga unlawful in this particular instance. This essentially forces Māori agreement. The right to determine Māori representation, and disagree with inadequate representation, is also part of tino rangatiratanga and should not be overridden.
 - c. When hapū and iwi select representatives, it would be considered culturally and professionally crucial to the fulfilling of the role that they continue to seek hapū and expert input for the duration of the representation responsibility. The explicit restriction from seeking wide input from the community fundamentally undermines the iwi authority representatives’ ability to execute the role appropriately, in line with our cultural and community obligations as protected by Te Tiriti o Waitangi. The current nature of these restrictions imposed by the Bill would instead contribute to division in communities who are locked out of access to decision-making processes.
 5. Further points
 - a. The final decision-making power being placed in three ministers is not an adequate replacement for fair and just governance that is

accountable to Indigenous rights standards, hapū and iwi, and Te Tiriti o Waitangi.

- b. All iwi and hapū must be given the opportunity to engage in decisions being made through the Bill, and a Bill of this sort must also include appropriate timeframes and resourcing for iwi and hapū to ensure that there are no barriers to creating an environment for robust decision-making.