

**BEFORE COMMISSIONERS APPOINTED BY THE CANTERBURY REGIONAL COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** Applications CRC201188 for a land use consent to place structures within Coastal Hazard Zones 1 and 2, CRC201190 for a coastal permit to disturb, deposit material, erect and place structures and occupy the Coastal Marine Area and CRC201194 for a coastal permit to discharge contaminants to the Coastal Marine Area by Oceania Dairy Limited.

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**EVIDENCE OF TEWERA EDWIN KING FOR  
TE RŪNANGA O AROWHENUA, TE RŪNANGA O WAIHAO, AND  
TE RŪNANGA O NGĀI TAHU**

**5 June 2020**

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**Chapman Tripp**

Solicitor: Rachel Robilliard  
(Rachel.Robilliard@chapmantripp.com)

PO Box 2510  
CHRISTCHURCH 8442

Tel: (03) 353 1234

## Qualifications and Experience

1. My full name is Tewera Edwin King and I whakapapa to many Ngāi Tahu hapū, including Kāti Huirapa. Today, I speak on behalf of Kāti Huirapa with the support of Te Rūnanga o Arowhenua (**Arowhenua**) and Te Rūnanga o Waihao (**Waihao**).
2. The history of Kāti Huirapa with the land goes back more than 70 generations, when, according to tradition, Rākaihautū came to Te Wai Pounamu from Hawaiki in the canoe Uruao. The canoe landed at the boulder bank at Whakatū (Nelson). While his son Te Rakihouia took some of the party down the east coast, Rākaihautū led the remainder through the interior to Te Ara a Kiwa (Foveaux Strait). With his ko (digging stick) Rākaihautū dug Te Kari O Rākaihautū (the southern lakes).
3. I am the Upoko (appointed traditional leader) for Waihao and for Arowhenua. I was appointed to this position approximately 15 years ago on the passing of my relation, Kelly Davis, who I have referenced in my evidence.
4. Being Upoko comes with an inherited responsibility, linked by whakapapa to the wider area surrounding the Oceania Dairy Factory Wastewater Pipeline and Outfall resource consent application and its perceived effects. The consent application is in the shared interest areas of Waihao and Arowhenua.
5. This evidence has been prepared in accordance with the collective mātauranga (knowledge), experiences, beliefs and mana of Kāti Huirapa and Waihao and Arowhenua, who hold mana whenua and mana moana over the application area. It is with the greatest respect and integrity that I present this evidence to the Environment Canterbury hearing on behalf of Waihao and Arowhenua.
6. In preparing my evidence, I have referred to:
  - the oral histories and written manuscripts of Ngāi Tahu tūpuna
  - Waitangi Tribunal, Ngāi Tahu Sea Fisheries Report (WAI 27, 1992)
  - Waitangi Tribunal, Ngāi Tahu Report (WAI27, 1991) (**WAI27**)
  - Ngāi Tahu Deed of Settlement 1997 and Ngāi Tahu Claims Settlement Act 1998
  - Iwi Management Plan of Kāti Huirapa for the Area Rakaia to Waitaki 1992 (**IMP**)
  - Waitaki Iwi Management Plan 2019

- Oceania Dairy Factory Wastewater Pipeline and Outfall - Assessment of Effects on the Environment Report 2019 (AEE)
- Cultural Impact Assessment for Oceania Dairy Limited Discharge of Clean and Factory Wastewater, Pipeline and Ocean Outfall 2019 (CIA)

7. In this evidence, I will discuss:

- Te Tiriti o Waitangi/Treaty of Waitangi and its affirmation by Kāti Huirapa
- Mahinga kai and the impacts of pollution
- The matters I considered in forming my opinion
- Consideration of alternatives.

### **Executive Summary**

8. We, Kāti Huirapa, look to fulfil our potential by pushing for equity and enabling current and future generations to walk with their tūpuna and experience the wairua our whenua. To do so builds the mindset needed to be kaitaki, strengthens our social cohesion and cultural identity, and enables the active transfer of mātauranga.

9. In environmental management, Kāti Huirapa practice ki uta ki tai. The cumulative effectiveness of pollution and lack of access to the coastal marine area have been a matter of concern to Kāti Huirapa for many generations now. What has changed since the Fisheries and Ngāi Tahu Historical claims to the Waitangi Tribunal in the 1980s/90s is that the matters raised have gotten worse. The pressure and stress on the whenua and moana is even greater now than what it was 40 years ago.

10. It is inappropriate to claim the environmental state of the area around the proposed waterway discharge is 'just the way it is' and it will not be too much worse due to this consent application. Instead, we should be working very hard as kaitiaki to protect the mauri of coastal marine area and improve the hauora of the environment and water. To do so enables Kāti Huirapa to maintain our associations with our ancestral lands, water, sites, wāhi tapu, and other taonga.

11. The Cultural Impact Assessment outlined several cultural values relevant to this area and the activities in this consent application, but no assessment of the impacts on the values was undertaken by Aukaha due to a lack of information.

12. We think this consent application is contrary to the aspirations of Kāti Huirapa and its affirmation of Te Tiriti o Waitangi/Treaty of Waitangi. Te Rūnanga o Arowhenua and Te Rūnanga o Arowhenua find the direct discharge of wastewater in the coastal marine area to be culturally abhorrent.

### **Consultation with Kāti Huirapa**

13. The Yili Group, through its consultants Babbage, consulted with Waihao and its mandated environmental entity, Aukaha, prior to lodging the application. I was not party to those discussions or the CIA as I am not an executive member of Waihao.

14. Aukaha prepared a CIA in February 2020 and noted the lack of detailed information in the AEE from which to undertake its assessment.<sup>1</sup> Nonetheless, a range of cultural principles and values were summarised in the CIA to provide an overarching assessment of the consent application. The effects of the activity on those values were unknown due to a lack of information in the AEE. The CIA also said that *'this report should not be seen as all the consultation required with Te Rūnanga o Waihao but as a basis for ongoing consultation and discussion between Oceania Dairy and Te Rūnanga o Waihao.'*<sup>2</sup>

15. My evidence seeks to add to the understanding and application of those cultural values from a Kāti Huirapa perspective for the Hearings Panel to consider in assessing the consent application. I have not discussed the cultural values individually as was done in the CIA, but collectively as they are intertwined in the identity, society and thinking of Kāti Huirapa.

### **Te Tiriti o Waitangi/Treaty of Waitangi**

16. Arowhenua has long been a central meeting place for hapū from around Te Waipounamu to address the significant issues of the time, including grievances with the Crown.

17. Every day, I am reminded of Te Tiriti o Waitangi/Treaty of Waitangi and the generations it took for Te Kerēme<sup>3</sup> to be heard. The whare at Arowhenua is named Te Hapa o Niu Tireni. The name was given when it opened in 1905 to serve as a longstanding reminder of the loss of lands, resources, and rights of Ngāi Tahu communities throughout the South Island. Te

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<sup>1</sup> CIA, pp.4-5, 7.

<sup>2</sup> CIA, p. 7.

<sup>3</sup> Also known as the Ngāi Tahu Historical Treaty Settlement Claim.

Hapa o Niu Tirenī – The Broken Promises of New Zealand or The Grievances of Crown was placed upon the whare to recognise the transgressions endured by Ngāi Tahu. The whare is a physical reminder of the unfilled potential of those promises resulting in iwi and hapū unable to stand on an equal footing and compete in an evolving world.

18. When Te Tiriti o Waitangi was signed in 1840 by seven high-ranking Ngāi Tahu rangatira, it was seen as a convenient arrangement between equals. The majority of Te Wai Pounamu was then purchased by the settler government from Ngāi Tahu in a series of ten land purchases between 1844 and 1864. The largest was the 1848 Canterbury Purchase, commonly known as Kemp’s Deed. Ngāi Tahu believed that the land sales would guarantee their own usage rights to the resources in the region and strengthen robust political, economic and social relationships with newcomers.
19. This belief was not the reality. The government failed to honour their obligations under the land purchase agreements — such as the allocation of adequate reserves, protection of mahinga kai, paying a fair price for the purchased land, and the provision of schools and hospitals. Ngāi Tahu were robbed of the opportunity to participate in the land-based economy alongside the settlers, and were made virtually landless.<sup>4</sup>
20. The loss and injustices are the basis of Te Kerēme, and witnesses provided evidence for Ngāi Tahu in the 1980s-90s on the impact of that intergenerational loss in WAI27:

*William Torepe reviewed past and present availability of mahinga kai from Waitaki to Rakaia (H10:4). He briefly commented on the presence or absence of such kai as tuna, fish, watercress, wild fowl and acclimatised species in the Opihi, Waihi and Temuka Rivers, Milford Lagoon, Hae Hae Te Moana, Kakahu, Lakes Tekapo, Alexandrina (McGregor), Wainono, Benmore and Aviemore, the beach in the vicinity of Pareora River and Waimate Creek. This witness sadly related the diminution of “Maori kai”, which he listed at the beginning of his submission, and how this has affected traditional hospitality to guests on the marae.<sup>5</sup>*
21. The grief is still strong, and I teach this history to mokopuna and whānau. However, as Tā Tipene O’Regan noted in his 2014 Vincent Lingiari Memorial Address:

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<sup>4</sup> <http://www.kahurumanu.co.nz/cultural-mapping-story/te-kereme-the-ngai-tahu-claim>.

<sup>5</sup> WAI27 p.859.

*Over the course of that long struggle our identity as a people had become rooted in grievance – in a sense of collective loss. If this, then, is the core of one’s identity, the crucible of one’s culture, it’s not a great basis on which to foundation a future.*<sup>6</sup>

22. And from this, we are tasked with moving forward. As a hapū and Papatipu Rūnanga, it is our aim to revitalise Te Hapa o Niu Tireni as the place that our people can carry in their hearts and memories wherever they may be in the world.<sup>7</sup> This does not mean looking away from our history, but to understand it, rebuild and provide equity to fulfil our potential.
23. The Ngai Tahu Claims Settlement Act 1998 states that *in fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tangata whenua of, and as holding Rangatiratanga within, the takiwā of Ngāi Tahu Whānui.*<sup>8</sup> Our rangatiratanga includes the customary rights that we continue to hold over our waters, both inland and offshore.
24. For Kāti Huirapa to express our relationship with Te Ao Tūroa and to exercise our responsibilities as Rangatira and Takata Tiaki is to fulfil our potential. To do that requires we be confident and considered, and take a multifaceted approach that includes:
- Decision making at all levels with Treaty Partners and those with delegated obligations
  - A strong economic base for our people
  - Diverse skill sets of mātauranga and western knowledge
  - Long term strategic thinking that provides for intergenerational prosperity and resilience
  - A shift in the way the environment is managed and regarded to enact Ki Uta Ki Tai – we are part of nature, not its master.

### **Mahinga Kai and Pollution**

25. In the 1800s, chief Te Huruhuru lived in several places around the Morven and Waimate district. He had a kaik on the Waitaki and a Pa site at Point Bush in what was then known as Te Waimatemate. He collected mahinga kai around the Wainono Lagoon, a mahinga kai that fed those that lived in the Pa and kaik when they were there, in particular, tuna.<sup>9</sup>
26. Arowhenua, as known today, is the result of the desire to move to a more permanent settlement in the late nineteenth century and the need to maintain a greater visible

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<sup>6</sup> <https://www.cdu.edu.au/sites/default/files/opvcil/sir-tipene-oregan-speech-2014.pdf>.

<sup>7</sup> See <https://arowhenua.org/>.

<sup>8</sup> Ngāi Tahu Claims Settlement Act 1998, section 6(7).

<sup>9</sup> ‘Te Huruhuru’ in Brown H., Norton T. (ed) (2017) *Tāngata Ngāi Tahu: People of Ngāi Tahu*, vol. 1, pp.231-35

presence in light of increased European settlement in the vicinity. The Temuka township, one kilometre from Arowhenua, was quickly becoming a significant trading post in the region, and growth in the nearby port town of Timaru, along with the establishment of large farming stations throughout the region, meant that whānau risked becoming isolated from traditional lands and food gathering sites.

27. The spatial scale of settlement was (and still is) much larger than just Arowhenua and Wainono, comprising of the inland areas and along the eastern coast, and Kāti Huirapa moved freely within that space. Whanau were not limited to a discrete number of mahinga kai and it is still our right that we are not; hence, our focus on restoration, reconnection and being able to safely access, harvest and consume resources within our takiwā. There has been a continuous relationship with the area surrounding the consent application for many, many generations and it remains significant for Kāti Huirapa.
28. This point is why I am confused and annoyed by the comments in the consent application that ‘we are of the understanding that the immediate foreshore area has no particular significance to local iwi as a food source.’<sup>10</sup>
29. There is no reference or statement to support this comment in the consent application. Mr Greenaway or Ms Coates do not regard themselves as mahinga kai experts and are silent on cultural practices in their evidence. The AEE comment is, in fact, contrary to my understanding of mahinga kai and the significance of the coastal marine area as a food source. It is also at odds with the mātauranga of our hapū experts and practitioners, and with oral histories and the recorded archaeological sites in the area<sup>11</sup> (recognising that many more historical sites could have been destroyed, are unrecorded or have a no tangible evidence).<sup>12</sup>
30. Ki uta ki tai, the foundation of Ngāi Tahu environmental management, has not been assessed or considered in the applicant’s evidence. The movement of species and people through the awa, whenua and moana and the impact of environmental factors such as pollution on their hauora and whether they are present or not, and why not, is important to us in our assessment of the impacts of this consent application on our values.

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<sup>10</sup> Consent application, p.20.

<sup>11</sup> <https://archsite.eaglegis.co.nz/NZAAPublic>.

<sup>12</sup> Historical sites include archaeological but a historical site is not always an archaeological site (see definition of archaeological site under section 6 of the Heritage New Zealand Pouhere Taonga Act 2014).

31. Mahinga kai are not a one-off resource. For an area to be used and a species harvested, the collective parts must be able to sustain themselves within a specified cycle. This cycle also determines the types and quantities of resources that can be harvested during that season. Both hapū rights and responsibilities guide mahinga kai<sup>13</sup> and hapū are expected to manage the resource so that it will be available for future generations.
32. If and where mana whenua can exercise their customary rights and practices in the area surrounding the consent application is not a question of significance – it is far more complex than that. Historical maps show preferential mahinga kai sites when access and use was managed by whakapapa rather than government colonisation policies, land alienation and species presence/health. These maps have never been regarded by Ngāi Tahu as the complete list of all mahinga kai and cannot be the sole basis of any assessment on the significance of the local area for mahinga kai.
33. The loss suffered by Ngāi Tahu and recorded in documents such as WAI27 are well known and our mahinga kai are not limited to historical references taken from a time of plenty. Much to our frustration, our mahinga kai and cultural practices are often ignored, unrecognised or pushed aside for other interests.
34. Yet, we push to continue our cultural practices, including in coastal areas. In the Fisheries Claim, my relation Kelly Davis<sup>14</sup>, listed the areas of mahinga kai known to him from childhood when living at Waihao and the species of fish and shellfish taken from those areas. He recalled his father's practice, when out of work:
- to fish . . . every day when possible to feed us as there was no unemployment benefit those days. He used to catch red cod mostly, blue cod was also caught, also grey shark and dogfish. (H10 :34)<sup>15</sup>*
35. Kelly Wilson also said in that Claim that:
- Māori people had another great resource as well and this was the sea. It was not only a garden that provided much of the food. It was also a highway by which he travelled up and down the country. The coast and the coastal fishing grounds were identified like the land, marked off in tribal boundaries just as the land was. And there was no significant shellfish bed or fishing ground . . . [t]hat was not claimed,*

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<sup>13</sup> Dacker, B. (1990) *The People of the Place: Mahika Kai*, p.16

<sup>14</sup> As noted, Kelly Davis of Arowhenua was Upoko before me and spoke on behalf of the Waihao Papatipu Rūnanga before the Tribunal's inquiry into sea fisheries.

<sup>15</sup> The Ngāi Tahu Sea Fisheries Report 1992, para 2.2.3.



*possessed or jealously guarded. The importance of Kai-Moana was very great as it is today. Seafood was the staple diet of Maori people. It was as it is now a matter of Mana for the hapū or tribe to preserve seafood on any special occasion. (H8 :22)<sup>16</sup>*

36. Constant pressure on the health of mahinga kai and taonga species is even greater today than when William Torepe gave his WAI27 evidence.<sup>17</sup> Consequently, the mahinga kai we have left and any safe and known areas and taonga species have become increasingly important.<sup>18</sup> Mātaitai dot our coastline as a means to protect fisheries and allow for customary practices. Getting mātaitai and taiāpure in place is difficult and challenging,<sup>19</sup> and they do not always align with our traditional or modern preferences. There is a degree of trying to protect the best of what is left, where we can.
37. I feel like we are fighting battles on every front to ensure ki uta ki tai, management of taonga and to protect what remains from the significant cumulative effects of pollution and an exhausted whenua.
38. Our kaumātua spoke of the problem of pollution multiple times during the Fisheries Claim. Most of the evidence was directed to pollution of kai moana along the sea shore and in estuaries caused by effluent from sewerage schemes, rubbish dumps, wool scourers, freezing works, paper mills, hide tanneries and a variety of agricultural and industrial wastes.<sup>20</sup> In his evidence, Mr Greenaway outlines the current condition of the coastline at specific points<sup>21</sup> and demonstrates the negative issues still facing us as kaitiaki – a coastline heavily modified, waste and pollution on the shore, restricted access and few species present.
39. It is no wonder Mr Greenaway advises that the *net effect of the proposal on recreation is likely to be negligible*<sup>22</sup> as the coastal area continues to be neglected and treated like a dump. However, this is an inappropriate state - a state not to be accepted as 'just the way it is'. The coastal marine area is in our takiwā and therefore, of significance to Kāti Huirapa.

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<sup>16</sup> The Ngāi Tahu Sea Fisheries Report 1992, para 2.2.6.

<sup>17</sup> Tipa and Associates Ltd (2015) *The Cultural Health of the Waitaki Catchment*, p. 82.

<sup>18</sup> Taonga species includes those referenced in the Ngāi Tahu Claims Settlement Act 1998, and a more extensive Kāti Huirapa list (e.g. tuna and inaka and kanakana) which is absent from the Act due to artificial limitations set by the Crown.

<sup>19</sup> For the matters that need to be considered in establishing mātaitai, see the Fisheries (South Island Customary Fishing) Regulations 1999, s 20

<sup>20</sup> The Ngāi Tahu Sea Fisheries Report 1992, para 2.3.

<sup>21</sup> Evidence in Chief (EIC), 28 May 2020, para 16.

<sup>22</sup> EIC, 28 May 2020, para 48.

40. Nothing seems to have been learnt or changed from the Fisheries Claim and, like my tūpuna, I am still faced with trying to reduce pollution in the moana. Polluted waterways and coastal areas are not a legacy I want to pass on to future generations. It is our expectation that where there is environmental degradation, we all work hard to restore its mauri.

### **Considerations as Upoko**

41. As Upoko, it is my aspiration that future generations will be able to freely walk our whenua and te ara tawhito (trails), along our waterbodies and to stand on the shore looking out to our bountiful ocean that has sustained us for many generations. To do so means that they walk with their tūpuna and experience the wairua of our whenua, become steeped in our culture and understand the responsibilities, mindset and tools to be kaitiaki. This connection strengthens the hauora of our people, and the social cohesion and cultural identity of Kāti Huirapa.

42. It is a grave concern to me that current and future generations of Kāti Huirapa are limited in the places they can walk and the hauora of those places is generally declining and challenged by further degradation. They cannot see or experience the interconnections of our places and the practices that are the foundation of our culture.

43. Pollution effects all aspects of our cultural identity; from our pepeha to the mana of our wāhi tapū. Mahinga kai is the cultural heritage of Kāti Huirapa. Internationally, cultural practices such as the Jeju Haenyeo (women divers), have been recognised by UNESCO in its Lists of Intangible Cultural Heritage.<sup>23</sup> However, the same regard and protections under the Resource Management Act 1991 have not been afforded to our cultural heritage<sup>24</sup> to protect it from inappropriate use and development.

44. It is my role as Upoko to uphold Kāti Huirapa tikanga and kawa, and to ensure that hapū can continue to undertake mahinga kai where they have a traditional right to do so. That ability may be through promoting restoration and, in this case, is through preventing further degradation and restricted access to and within the coastal marine area.

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<sup>23</sup> <https://ich.unesco.org/en/lists>.

<sup>24</sup> Definition of 'historic heritage' includes cultural heritage, section 2 Resource Management Act 1991.

45. Polluting our waterways and using the coastal area as a rubbish pit is culturally abhorrent and inappropriate. Washing pollution through the system does not remove its effects, and pumping waste out to sea does not remove or reduce the issue for mana whenua. It just moves the issue from one area to another, with different impacts for us to manage as kaitiaki.
46. Ki uta ki tai – from Aoraki to the coast – all of our practices (cultural, economic, environmental, etc.) should be done in such a way that protects the sustainability of the environment to provide the resources we need to live our lives. This is fulfilling our potential by ensuring the culture, identity and foundations of Kāti Huirapa are strong and resilient for any future challenges and opportunities.
47. The mātauranga of Kāti Huirapa includes tohu/indicators of when waters are under pressure. The tohu are telling us that the mauri of the water is not intact and under intense pressure.

#### **Te Rūnanga o Arowhenua Position on the Oceania Consent Application**

48. The position Arowhenua has taken for this consent application is based on providing equity<sup>25</sup> for the future. We have suffered enough loss through broken promises and for loss to continue through pollution is not permissible. We do not consider this consent application in isolation from the pollution that already washes through our whenua, awa and along our coasts. This position is borne from conversations with hapū and locals harvesting along waterways and moana, the mātauranga passed down to me and research on waters within the consent application area.<sup>26</sup>
49. Being Upoko puts me in a position of oversight. I do not see this consent application as a fight but an opportunity to get this right as I believe in 10 years' time we will be past the point of no return.
50. I also acknowledge the effects Covid-19 has had on our economy and society; but it has also provided us with a 'once in a generation' opportunity. Instead of rebuilding this country to what it was before, we now have an opportunity to act in a way that reflects our real place

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<sup>25</sup> IMP states 'The Crown and other agents with authority delegated by the Crown are called upon to consider and put into effect that which ensures a fair and equitable partnership.'

<sup>26</sup> For example, Tipa and Associates Ltd (2015) *The Cultural Health of the Waitaki Catchment*, p. 167.

in the environment and rebuild New Zealand to what it could be – a country that acknowledges the importance that our land and waters have, not as a commodity, but as the source of our hauora. We are not the owners of Te Ao Tūroa that can do whatever we want – we are just guardians that need to pass it on to those coming after us in a better condition than it is now.

51. The consent application does not move positively towards the affirmation of Te Tiriti o Waitangi/Treaty of Waitangi with Kāti Huirapa, nor does it enhance our cultural values or provide for our cultural practices. The discharge within the coastal marine area pollutes our waters, seabed and current fish and shellfish populations. It damages the sustainability and safety of mahinga kai and cultural practices, and removes any opportunity for restoration and the return of species.
52. It is wrong to have a diminishing number of mahinga kai sites across our takiwā nor should there be only a few sites left on an awa or the coastline. Such limitations have significant impacts on the cultural identity of Kāti Huirapa, our social cohesion and active transfer of mātauranga.
53. The IMP is clear in its position on mahinga kai – access to mahinga kai means access to water of sufficient quality and quantity to exercise traditional rights and customary uses. This consent application does not enhance that ability to practice or protect mahinga kai in any way; in fact, it detracts from it.
54. I am not knocking the attempt to mitigate as the reduction of impacts should be encouraged; it's the consent activity that is the issue. When you are at a point of saturation, it does not matter what you do if you continue to do the same, just elsewhere. I believe we are on the cusp of that saturation and this consent application moves us further away from equity and protecting the mauri of the water.

### ***Discharge to Land or Water***

55. In forming the position of Arowhenua, we did consider what is better – discharge to water or land? This is a very difficult question for this consent application as we regard the proposal to discharge to sea as a mitigation, not an enhancement. It is an attempt to remove the effects of the Oceania Dairy Factory further away from the everyday experiences of the local population.

56. Cumulative impact of another discharge to sea through this consent application coupled with the pollution washing out from our rivers weighs heavily on my mind. I must recognise the impact of the current discharge to land consent for Oceania Dairy Factory and that the discharge is seeping into the surrounding waterbodies as well as the air pollution and the unbearable odour. And as Upoko, I must uphold the tikanga and kawa of Kāti Huirapa and ensure the restoration, continuation and protection of our taonga species, cultural practices and heritage.
57. It is my preference that the Yili Group improve the current practices of the Oceania Dairy Factory and comply with their existing consents. This position means discharge to land is preferable in this instance. To make positive change, Yili Group need to learn and improve the practices at the Oceania Dairy Factory, not be given permission to expand and defer the issue. The discussion in the AEE around improvement should not just be based on the rural area but on reciprocity and how the Yili Group will improve the cumulative effects of the discharge from the Oceania Dairy Factory.

## **Conclusion**

58. This area has historical and contemporary associations, and still remains an area of significance for Kāti Huirapa and those maintaining ahi kā roa.
59. We are tasked with getting the decision on this consent application right for the district, region and wider. I am responsible to speak for those who are not here to have a say, recognising the role of Kāti Huirapa as kaitiaki and our right to exercise tino rangatiratanga.
60. Our whānau need to be safe harvesting and consuming kai, and our takiwā, both land and water, needs to be healthy. This consent application does not provide positive outcomes for Kāti Huirapa or Te Ao Tūroa. The consent application does not uphold the values of Kāti Huirapa. The assumptions in the AEE are unfounded and contrary to our mātauranga.
61. We understand that there have been significant changes in our takiwā as a result of land use and the level of degradation that has occurred as a result of this has potentially changed some of our landscapes forever. What has not changed is our connection with this area that holds our whakapapa and sustains Kāti Huirapa. The consent application will negatively change our takiwā and diminish the mana and mauri of our coastal marine area. I can say on behalf of Te Rūnanga o Waihao and Te Rūnanga o Arowhenua that any consent application

that further degrades the environment is not welcomed by our whānau and hapū. As such, we oppose this application.

**DATE** 5 June 2020

A handwritten signature in blue ink, appearing to read 'Tewera King', is written over a faint, light blue rectangular background.

**Tewera King**