

*Takiri te ata ki runga Tongariro, he ata kai taua, he ata kai tangata.  
He mihi kau atu ki runga i ngā tini āhuatanga o te wa.*

### Patutokotoko Position Statement

As communicated to the Crown multiple times last year, Patutokotoko are unified with Ngā Iwi o te Kāhui Maunga in our belief that any proposed solution/s for the ski fields of Tūroa and Whakapapa must, primarily:

- Uphold all our settlement agreements
- Not prejudice future settlement negotiations related to the Tongariro National Park
- Not prejudice the outcome of the terms and conditions of any concession license/s to be issued.

The position of Patutokotoko, has always been that adequate consideration, time, resource, information and consultation should be afforded to all iwi and hapū ahead of the finalisation of any proposed ski field transition plan/s and yet, here we are again. (refer Appendix 1)

### Timeframes

We note that the notification period for this consultation is between 18 December, 2023, and 9 February, 2024. Given the importance of this kaupapa, we believe that relying on the bare minimum statutory timeframes is unreasonable. While this time frame allowed for the government shut-down period it does not take into regard, the many pressures on Ngā Iwi o te Kāhui Maunga, Hapū and whānau. During this time period critical cultural events including the Tira Hoe Waka, Rātana Celebrations and Waitangi Day all take place.

Patutokotoko has repeatedly raised our concerns throughout the Ruapehu Alpine Lifts (RAL) discussion and continues to experience a significant lack of information, time and engagement from the Crown. Despite being safeguarded through a number of te Tiriti o Waitangi settlements and numerous governmental acts, policies, management plans and laws, we as tangata whenua have been continually compelled to advocate for the protection of our rights and interests.

We reiterate, any decision the Department makes regarding the possible issuing of a concession to Pure Tūroa limited **must not** prejudice future settlement negotiations relating to the Tongariro National Park

### Whole of Government Approach

The Minister of Conservation is aware of the concerns that have been raised by Patutokotoko throughout the RAL liquidation process. Our first pānui, “Ruapehu Ski Fields – Ownership Change” was sent to Crown and respective Ministers on 12 May, 2023 (refer Appendix 3). Concerns that have been constantly raised over the last nine months include the trading of the Tūroa name, the proposed length of term and inexperience of the new concessionaire, the inadequacies of the previous concession (including appropriate exit arrangements for the concessionaire) and the ongoing environmental effects of the ski field activity.

We continue to have these concerns as we do not believe they have been addressed in any meaningful way.

Until lodgement of the concession, the Crown committed to a whole of government response to the concerns raised. As part of this approach, Patutokotoko has met with Crown Ministers for an urgent meeting in Tūrangi and then again in Pukawa with senior Government officials from across the sector including Te Arawhiti, Department of Conservation and MBIE.

Patutokotoko have also begun meeting with Te Arawhiti on a regular basis.

Patutokotoko believe that these concerns need to be addressed in constructive and meaningful way and resolved in their entirety and again the Crown's approach to try and separate the issues across multiple agencies including DOC, Te Arawhiti and MBIE without adequate resolution is, inappropriate.

We believe that Ministers - through their officers - had committed to a whole of Government approach and are well aware of the risks associated with ignoring the kōrero of tangata whenua. This risk was highlighted in the DOC *Briefing to the incoming Minister of Conservation November 2023*:

*"Given some of the positions expressed by iwi regarding a commercial operation on Mount Ruapehu, there is a risk of a prolonged concession process, legal challenges and additional costs to the Crown to keep running the ski fields prior to the completion of any transaction."*<sup>1</sup>

MBIE's *Briefing to the incoming Minister for Regional Development November 2023* pertaining to the ongoing RAL discussions states, "there is a range of complex matters to consider including iwi views".

We support the kōrero of Te Ariki Tumu te Heuheu when he informed the Minister of Treaty of Waitangi Negotiations, Minister of Regional Development that he would not support a private commercial tender for the purchase of Ruapehu Lifts<sup>2</sup>. In his opinion this would not only be detrimental to the settlement agreement of Tūwharetoa but would also, "invite a situation where there is a prejudicing of our National Park negotiations, or the terms and conditions of the concession associated with Tongariro Maunga."

### **Iwi & Tongariro National Park**

The Department of Conservation (DOC) clearly acknowledges that Ngā Iwi o te Kāhui Maunga carry, "a perpetual responsibility of kaitiakitanga in protecting and safeguarding the tapu, mauri and mana of these sacred places"<sup>3</sup>. For tangata whenua there are both the physical and spiritual responsibilities inherent in the practices of kaitiakitanga. For Patutokotoko this means having the ability to proactively and effectively protect the tapu, mauri and mana of our lands and tūpuna maunga of the Tongariro National Park.

This highly sacred relationship we have with the Tongariro National Park was formally recognised internationally in 1993 with the site becoming the first in the world to receive a Cultural World Heritage classification from UNESCO following application from DOC.

In awarding their citation the UNISCO board stated that:

*"The Department of Conservation was committed to a consultation process that will support an exemplary code of ethical conduct and field conservation practice that emphasise social responsibility and cultural sensitivity."*<sup>4</sup>

### **Management of the Tongariro National Park**

Patutokotoko acknowledge that alongside the National Parks Act 1980 and Conservation Act 1987 there is an adherence to multiple other governing document including the Tongariro National Park Bylaws 1981 and Tongariro/Taupo Conservation Management Strategy 2002 – 2012 and Tongariro National Park Management Plan (TNPMP) 2006-2016 which, both the Crown and Iwi, hapū and whānau must consider.

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<sup>1</sup> Department of Conservation. (2023) Briefing to the incoming Minister of Conservation November 2023. 37.

<sup>2</sup> Tumu te Heuheu, (31 August 2023) Letter - Tūwharetoa Iwi – Ral Kaupapa

<sup>3</sup> Department of Conservation. (2017) Notified Concession Officer's Report to the Decision Maker, Permission Number 48601 - Tūroa Ski field. Appendix 2, 2.

<sup>4</sup> UNISCO World Heritage Centre. (1993). World Heritage List Tongariro. No.421rev.

Sections 3.1. and 4.1.2 of the TNPMP specifically refers to the principles and objectives of the Treaty of Waitangi and He Kaupapa Rangatira, a mechanism developed to give meaningful effect to ToW principles and objectives in all areas of management of the Park. In consideration of any concession application in the first instance, DOC is obligated to ensure the Crown are upholding the nine founding principles of He Kaupapa Rangatira including:

**Principle 7**

Tautiaki Ngangahau: The duty of the Crown to ensure the active protection of taonga for as long as Māori so wish it.

Objective: To actively protect the interests of iwi in respect of land, resources, and taonga administered by the department or under the department's control where these are considered by iwi to be of significance to them.

**Principle 8**

He Here Kia Mōhio:

The duty of the Crown to make informed decisions.

Objective: To engage in regular, active, and meaningful consultation with iwi in respect of the work of the conservancy.

**Principle 9**

Whakatika i te Mea He: The duty of the Crown to remedy past breaches of the Treaty and to prevent further breaches.

Objectives: To avoid any action which might frustrate or prevent redress of Treaty claims. To assist the Government actively in the resolution of Treaty claims where these relate to Tongariro/Taupō Conservancy. To address any grievances which tāngata whenua might bring to the attention of the department, formally or informally, in respect of any act or omission of the department in the administration of the park.

**Pre-application processes**

Prior to the application of PTL being lodged Patutokotoko were of the understanding that there had been a commitment to engaged with Patutokotoko and for the Crown to provide advice on appropriate conditions for the activity and how this mahi would be resourced. There has been no pre-application engagement of any sort by DOC with us prior to the release of this application through the public consultation process (refer Appendix 2).

**Consideration of the concession application from PTL**

The hapū of Patutokotoko are unified with Ngā Iwi o te Kāhui Maunga in our belief that any proposed solution/s for the ski fields of Tūroa and Whakapapa must, primarily:

- Uphold all our settlement agreements
- Not prejudice future settlement negotiations related to the Tongariro National Park
- Not prejudice the outcome of the terms and conditions of any concession license/s to be issued.

However, DOC has chosen to put out the concession of PTL straight to public consultation. As hapū at place, as tangata whenua of the Tongariro National Park, we now must consider what has been proposed.

We have some whānau who believe that this kaupapa is being driven by the MBIE and is a done deal but, as a good te Tiriti o Waitangi partner we will do what has been asked of us and, "have our say"<sup>5</sup>. This is evident

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<sup>5</sup> <https://www.doc.govt.nz/get-involved/have-your-say/all-consultations/2023-consultations/pure-turoa-limited/>

with the Ngā Waiheke lift being closed and leaving it with the Department of Conservation for its removal at a time where the department has very little money going into core conservation mahi on the maunga.

Patutokotoko does not support the issuing of a license and lease for the Tūroa ski fields to PTL by the Crown without further direct engagement with the hapū to ensure that the issues raised by us are addressed.

### **PTL claims of engagement with Ngā Iwi o te Kāhui Maunga**

Despite being well aware of the critical importance of the need for a licence to operate from at least, 20 June, 2023 (Watershed hui) and a clear understanding of the legislative requirements to engage with iwi PSGEs through the statement, “PTL are committed to mitigating cultural effects on an ongoing basis through the maintenance and enhancement of relationships with tangata whenua at governance and management levels”<sup>6</sup>, there is little evidence shown in this copy-and-paste application that indicates any effort or level-of-care has been taken.

As indicated to PTL via email on 28 November, 2023, the Department states the, “CIA was commissioned with Ngāti Rangi which is only one of the four identified iwi groups interests at Tūroa”<sup>7</sup>, we do not believe this was new knowledge to the applicant. Other than Uenuku | Te Korowai o Wainuiārua and Ngāti Rangi there has been no engagement identified by the applicant with any of our Kāhui Maunga whanaunga or Ngā Tangata Tiaki as identified in Appendix 10 Record of Iwi Engagement.

This Iwi engagement table notates a mere four kanohi ki te kanohi hui which in considering the desire of PTL to enhance their relationship with tangata whenua, this is unacceptable.

Prior to the application being lodged there was a commitment that Patutokotoko would be engaged to provide advice on appropriate conditions for the activity and that this mahi would be resourced. There has been no pre-application engagement sought by DOC for the concession (refer Appendix 2).

PTL, “wish to pursue a partnership or relationship agreement with Ngāti Rangi and Uenuku”<sup>8</sup>. The exact the same statement was made by RAL on their application for Tūroa in 2017. Seven years later, Uenuku | Te Korowai o Wainuiārua is still waiting to sign their partnership/relationship agreement with RAL and we note that the five-year review of operations is now two years overdue.

We do not believe that a like-for-like licence should be entered into. Should the Department continue their position of granting a licence to PTL it is the view of Patutokotoko that at a bare minimum, signed partnership agreements with both Uenuku | Te Korowai o Wainuiārua and Ngāti Rangi should be required before DOC confirms any licence issue.

### **The PTL application itself**

On reading this application from a company who have never previously owned a ski field operation there was, for some reason, a degree of familiarity. On closer inspection, the vast majority of PTL’s application was a copy-and-paste of Ruapehu Alpine Lifts’ previous application for Tūroa which was actually predominantly a copy-and-paste of their application for a concession for Whakapapa, all prepared by Cheal Consultants (refer image 1).

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<sup>6</sup> PTL. (2023) PTL – Tūroa Ski Area application for licence and lease. 6.

<sup>7</sup> Email from DOC. (28 November, 2023) Turoa Applicaiton – cultural impact assessment

<sup>8</sup> PTL. (2023) PTL – Tūroa Ski Area application for licence and lease. 18.

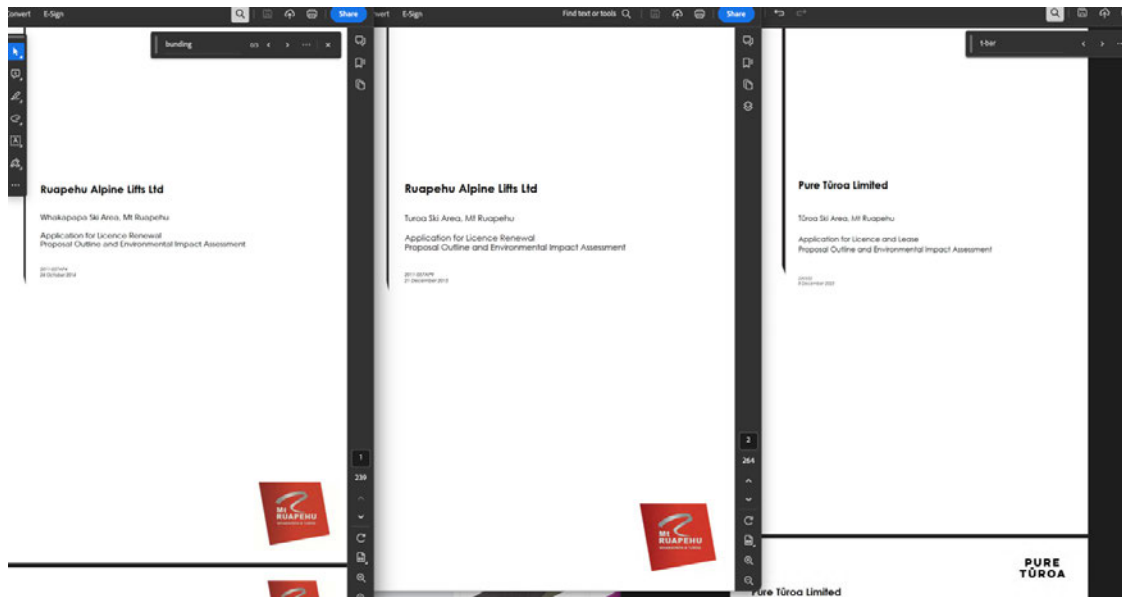


Image 1

Just 12 days before the agreed deadline of 10 December, 2023<sup>9</sup>, on 28 November, 2023, the Department advised, “I think you mentioned you have RAL’s previous applications. Use this as a guide when completing the new application”<sup>10</sup>. It is clear by the amount of plagiarism in this application that PTL did just this (refer images 2 & 3).

## 1. INTRODUCTION

RAL took over operation of the Turoa Ski Area in 2000. The Ski Area has a long history of commercial use and consequently has extensive infrastructure established onsite. Road access to the ski area was established and the first licence for skiing was issued in the mid-1960s. The ski area is operated to provide recreational opportunities all year round which cannot be located outside of the National Park due to the topography and altitude necessary for skiing and associated high alpine recreational activities and experiences.

Image 2: Ruapehu Alpine Lifts Application for Licence and Lease: page 7

**PURE  
TŪROA**

## 1. INTRODUCTION

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Image3: PTL Application for Licence and Lease: page 7

<sup>9</sup> Email from DOC. (7 December, 2023) PTL lodgement information

<sup>10</sup> Email from DOC. (28 November, 2023) Turoa Application – cultural impact assessment

## Factual inaccuracies

Owing to the copy-and-paste plagiarism of previous documents it is noted that some of the knowledge and claims being shared in both the Application and Indicative Plan are quite simply factually incorrect. Amongst others these include:

- 1) **Section 4.4 Structures and Built Form:** claims the existence of “T-bars” despite the Jumbo being removed over a decade ago, we know of no t-bars currently installed at Tūroa
- 2) **Section 6.4 Ecological Values:**
  - a) “The initial report confirmed that the [fuel storage] structures in place in 2013 were compliant with all regulations”. The DOC are well aware that following the diesel spill of October 2013 it discovered the tank had not had a code of compliance inspection for a number of years and subsequently RAL was convicted for their failure to maintain the fuel storage system.
  - b) “There are four permanent fuel tanks”, the existence of only two have been identified in Appendix 1. We understand the fuel tank situated between the Snowflake café and snow-cat maintenance shed has been removed and are not aware of any replacement.
  - c) “Bunding of petrochemical storage”. We understood this had occurred across all fuel storage tanks post the 2013 spill. Is this not the case?
- 3) **Section 6.5 Recreational Values:** “there are no adverse impacts on recreational values – such as affecting pristine areas of the Mountain”. The authors of the National Park Inquiry Report state that it is: “entirely inappropriate for the Department of Conservation to continue to decide, unilaterally what the extent of the restricted area [Pristine Area] should be” and that, “a Treaty-compliant process for ongoing decision making about this issue should properly be discussed between claimants and the Crown in the future. “Only then will tapu areas on the maunga be guaranteed of appropriate protection”<sup>11</sup> (refer Appendix 1).

## TNPMP inconsistencies

Patutokotoko were unaware that a draft PTL Indicative Development Plan was also to be considered. Contained in this document are a number of inconsistencies and proposed breaches of the TNPMP. Examples of these include:

- 1) **Design Carrying Capacity:** *An Overview of our Environmental & Cultural Objectives Presented to iwi and DoC* was provided to some tangata whenua in August 2023. Page two informs us of a planned reduction in, “target daily skier numbers to a maximum of 3,500 – a significant reduction over the current 5,500”. We note this licence application now states on multiple occasions this figure has decided to increase this figure to 4,500-skiers and PTL plan to cater for 30% non-skiers<sup>12</sup> which on peak days will place PTL in breach of the TNPMP carrying capacity of 5,500. The proposed IDP clearly acknowledges that capacity is not simply about the number of happy skiers can head up the maunga but that it also defines, “the volume of carparking, number of toilet and café facilities [sic]”<sup>13</sup>. The Department's ongoing ability to restrict the maximum carrying capacity numbers to all manuhiri rather than just “skiers” is a historical issue that must be rectified moving forward.
- 2) **Carparking charges:** TNPMP Section 5.2.3 (Base Area Strategies) states, “Concessionaires will incorporate car park fees into their lift ticket prices”. However, Section 6.4 3 of the IDP states, “RAL and DOC may implement a charging regime of some form (eg carpark fee)”.

## Cultural Impact Assessment

As hapū at place in beginning to attempt to robustly consider this application from PTL, it must be said that a new Cultural Impact Assessment (CIS) is the first document we looked for. Unlike RAL previously we can't even

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<sup>11</sup> Ministry of Justice. (2013). Te Kāhui Maunga: the National Park District Inquiry Report. Lower Hutt, Waitangi Tribunal. III. 864.

<sup>12</sup> PTL. (2023). PTL. (2023) PTL – Tūroa Ski Area application for licence and lease. Appendix 9, 6.

<sup>13</sup> PTL. (2023). PTL – Tūroa Ski Area application for licence and lease. Appendix 9, 8.

find one mention of a report even being commissioned in PTL's application. On 30 November, 2023, <sup>Sec 9(2)(a)</sup> sent an email to DOC<sup>14</sup> seeking the provision the previous iterations of a number reports including the CIA a requirement of which is heavily referred to throughout the 2017 *Notified Concession Officer's Report to the Decision Maker, Permission Number 48601 - Tūroa Ski field*.

In this email <sup>Sec 9(2)(a)</sup> states, "I'm not sure what to write about CIA's when no one can find the old one, and not sure if new one has been engaged? No one has yet told me what consultation has occurred.

The Department replied:

*"In regard to CIA's. I think it is best to not even mention CIA's, unless you can confirm PTL intend on obtaining one (you will need to confirm this). My recommendation is to confirm what engagement/consultation has occurred to date as per my previous advice. It is really important that PTL engage with iwi prior to submitting their application (and I am sure they have been) as iwi will expect this due to the significance of Mt Ruapehu to them and will be very likely to make multiple submissions during notification. I can only recommend you find out what engagement has occurred and note this in the application."*

In the opinion of Patutokotoko it is not and has never been the role of the Department kaimahi to arbitrarily decide if a CIA is required for application of such significance to tangata whenua. We also note in this same email thread the DOC author appears to note even have a basic understanding of the contents of the TNPMP, "Can you please confirm what context the He Kaupapa Rangatira relates to – is this the Ngāti Tuwharetoa [sic] Deed of Settlement?"

#### **Provision of other Historical Assessment documents**

The introduction to the PTL application states:

*"Also included in the appendices is an Assessment of Landscape and Visual Effects, an Ecological Assessment and an Economic Assessment. These assessments were undertaken in 2014 for the previous RAL licence application and are provided due to time constraints getting updated assessments."*<sup>15</sup>

This need by the Crown for PTL to acquire a concession was confirmed in a pānui from Chapman Tripp to MBIE as early as 13 June, 2023, "PTL requires the Department of Conservation (DoC) Tūroa licence to occupy the land and conduct a ski field dated 21 September 2017 (Tūroa Concession) be assigned from RAL to PTL on or before completion, on terms satisfactory to PTL."<sup>16</sup> While re-assignment of the RAL licence never occurred a valid concession and has always been a condition of sale of Tūroa ski field to PTL for \$1<sup>17</sup>.

If PTL are well aware of the need for a concession application to be made and had at least six months to prepare, does the Department agree with the above PTL statement that it is acceptable to assess this application based on information written a decade ago in 2014?

#### **The reports supplied are:**

1. 2014 Assessment of Landscape and Visual Effects - Turoa Ski Area – Indicative Development Plan [2011] – Assessment of Landscape and Visual Effects
2. 2014 Ecological Assessment - Ecological Assessment of the Turoa [sic] Ski Area

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<sup>14</sup> PTL/Cheal. (30 November, 2023). Email RE: [#P230603] PTL concession.

<sup>15</sup> PTL. (2023). PTL – Tūroa Ski Area application for licence and lease. 7.

<sup>16</sup> Chapman Tripp (13 June, 2023). Letter to Robert Pigou – Ruapehu Alpine Lifts Limited (Administrators Appointed)

<sup>17</sup> Chapman Tripp (13 June, 2023). Letter to Robert Pigou – Ruapehu Alpine Lifts Limited (Administrators Appointed)

3. 2014 Economic Assessment – Lifting the Region – The economic benefits of the Ruapehu ski-fields (ironically penned by PWC the current Court appointed liquidators of RAL).

Surely a newly formed company like PTL (registered 13 March, 2023) who have never run a ski field operation before would have commissioned an economic assessment ahead of considering their own bottom lines in making a bid to MBIE seeking not only ownership of the assets but future investment by the Crown?

Clearly there have been vast changes in all of these areas over the last decade. From a whānau perspective, what may have appeared to have been tolerated to the Crown back in the day has now turned into tangible expectations from hapū at place following the subsequent settlement of a number of Kāhui Maunga Iwi. All reports presented for consultation and consideration by any applicant should be current.

The release of the Kāhui Maunga Report in 2014 has also contributed to a growing expectation that at a bare minimum acknowledgement of the principles of te Tiriti and He Kaupapa Rangatira as applied to the ongoing management of the Tongariro National park is quite simply not good enough.

Patutokotoko anticipate a post Kāhui Maunga settlement space where, owing to the evidenced taking of our lands, the discrepancies in management of the Tūroa zone (DOC defined Pristine Area) and the outstanding issue of the Rangipo North 8 block - which the vast majority of Tūroa ski field sits on – the expectations of Patutokotoko are that the agreement the Crown finalised in 2023 for Tarakaki Maunga is a natural start point for the settlement of the Kāhui Maunga claim by our PSGEs.

### Indicative Development Plan

Despite the claim by PTL that, “Due to time constraints, the existing landscape assessment for the 2011 IDP proposals is appended”, multiple instances of the copy and pasting of the Draft RAL Tūroa IDP May 2019 has occurred.

Section 2.1 of the proposed IDP states, “In most cases developments proposed in this Indicative Development Plan will replace an existing facility or provide for the removal of an existing facility”. This approach is clearly in-line with the needs of both DOC and tangata whenua. However, from the persistent usage of words such as “additional”, “extended” and “increased” it is unclear how this statement is being pro-actively applied. Without the availability of additional information or plans, examples of major “additional”, “extended” and “increased” developments, rather than like-for-like replacement.

Additional information is clearly required to be supplied to DOC and Iwi pertaining to indicated up-grade/replacements/expansion of infrastructure including the Movenpick Lift. Section 4.6 Infrastructure Consolidation<sup>18</sup> PTL states there will be a 40% reduction in the towers required on the existing fixed-grip chairlifts. <sup>Sec 9(2)(a)</sup> Policy Assessment<sup>19</sup> states:

*“Infrastructure is kept to a minimum and future plans are modest due to the Ski Area’s location in a National Park, due to the cultural values of the site and the dual World Heritage status. Accordingly, the proposal is considered consistent with key management philosophy 10 above.”*

It is unclear how they have come to this conclusion when the current base station at Tūroa is compared with the Sky Whaka building (refer image 4).

The same can be said of the proposed towers for a Gondola at Tūroa. The 2018 *Whakapapa Gondola Works Approval and Resource Consent Application* states the Gondola’s first tower at 9.7-metres is 94% higher than its Rangatira neighbour at approximately 5-metres (refer figure 5). The tallest tower in the Whakapapa Gondola construction is number 11. Standing at a proposed 21.5metres it is 44% higher than its nearest Waterfall equivalent at 14.9-metres.

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<sup>18</sup> PTL. (2023). PTL – Tūroa Ski Area application for licence and lease. Appendix 9, 20.

<sup>19</sup> PTL (2023),





Image 4 Left – View of the Movenpick and Parklane fixed-grip chair drive stations currently at the base of Tūroa. Right – View of the Whakapapa Gondola storage and drive station at the base of Whakapapa (under construction)

As mentioned above owing to the lack of factual information or the provision of multiple assessment reports and actual clear and transparent plans for the ski field it is impossible for Patutokotoko to provide any support PTL’s proposed IDP.



Image 5 First chair towers at the base of Whakapapa, Rangitira on the left and Gondola on the right

## Other concessions

### Appendix 2: Sub licences

Patutokotoko were totally unaware of this variation made in 2020 and can only assume it was non-notified. In PTL seeking a copy and paste, like for like concession this in effect creates a monopoly over all commercial opportunities on the concession area and negates any future opportunities for our hapū or Iwi post settlement of the Kāhui Maunga claim.

Section 7.3 states, “the Concessionaire shall notify the Grantor each time a new sub-licence agreement is formalized [sic]” literally creates a scenario where in the absence of any clearly defined relationship agreements with Iwi, PTL can bring in any contractor they wish to run, for a profit, any part of ski field operations the wish. We also note that under the heading *Sub- licensee Best Practise* no mention is made of need to also recognise Uenuku | Te Korowai o Wainuiārua or other Kāhui Maunga Iwi, like Ngā Tangata Tiaki.

### Application for Aircraft Activates

While we support the usage of drones for the purposes of safety management and maintenance over the length of any given license length, we do not support this application if it also allows the blanket usage of drones for the purposes of developing any communications colleterial.

### Concession Filming

Images and film for marketing and external usage and the process for is clearly for by DOC regulations, rather than one blanket concession covering the length off any licence, it is the view of Patutokotoko that like our Regional Tourism Organisation, an one-off permissions should be sought.

### Concession number: TT-236-EAS

We note RAL currently also has an easement concession TT-236-EAS but have been unable to locate any information about PTL’s plans for this. Integral to snow making, we are of the opinion this concession pertaining to the taking of our wai should also be publicly notified. Throughout PTL’s application they refer to increasing their snow-making capacity as a way of mitigating a number of issues including global warming. RAL’s 2019 *Draft Tūroa Indicative Development Plan* states, “the existing water take from the Mangawhero Catchment and the existing Reservoirs do not provide sufficient capacity for any expansion of the snowmaking system”<sup>20</sup> and proposes the construction of a new reservoir. It is unclear to Patutokotoko exactly how PTL plans to increase snowmaking with the current systems.

### Length of the proposed License

If formal relationship agreements have been signed with Uenuku | Te Korowai o Wainuiārua and Ngāti Rangi, Patutokotoko then views ten-years to be the maximum DOC should grant and agrees with a review after three-years. An additional full review should also be undertaken following the settlement of the Kāhui Maunga claim regardless of when this occurs.

We note that PTL’s expectation of preferential rights to renewal for an additional 20 years and suggest this statement will also need to be reviewed following the issuing of the Ngāi Tai Ki Tāmaki Tribal Trust v DOC/Fullers Group Limited/Motutapu Island Restoration Trust Supreme Court 2018 decision<sup>21</sup>.

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<sup>20</sup> Ruapehu Alpine Lifts. (2019). *Draft Tūroa Indicative Development Plan*. 18.

<sup>21</sup> Supreme Court of New Zealand. (2018). *Judgement of the Court, Ngāi Tai Ki Tāmaki Tribal Trust v DOC/Fullers Group Limited/Motutapu Island Restoration Trust*. SC 11/2018 [2018] NZSC 122.

The concession effectively creates a monopoly over all commercial opportunities. The application seeks a like for like concession that effectively creates a monopoly over all commercial opportunities on the concession area. This includes the allowance of There is no opportunities or future opportunities for our hapū or for iwi within the concession area.

We also note the use of our Tūpuna name. This concession actively continues to allows for the continued commercial use of our name without proper acknowledgement or recompense .

Furthermore we believe that the activity of flying and filming should not be allowed for the entire term of the concession. Instead we believe a shorter term or a series of one off applications should apply. We believe that the inclusion of filming and flying on a 10 year basis is too long and a shorter concession should apply.

## Conclusion

As shared with DOC, Te Arawhiti and MBIE in 2023, *Patutokotoko Position Paper Ruapehu Alpine Lifts* (refer Appendix 1) Ngā Iwi o te Kāhui Maunga, including the whānau of Patutokotoko, are currently entered into Te Kāhui Maunga negotiations with the Crown.

In considering the highly disputed nature of the tuku area boundaries it is the position of Patutokotoko that any discussions pertaining to the “gift” area should be done so unencumbered. Current consideration being given by the Crown pertaining to the commercial activities associated with Whakapapa and Tūroa ski fields will likely prejudice our negotiations in a way that could impact our ability to fully assert our tino rangatiratanga and kaitiakitanga over the Tongariro National Park, a provision that is provided for Patutokotoko hapu across multiple Deeds of Settlement and Agreements in Principle.

Pertaining to the DOC defined Pristine Area the authors of the National Park Inquiry Report state that it is:

- Entirely inappropriate for the Department of Conservation to continue to decide, unilaterally what the extent of the restricted area should be
- That a Treaty-compliant process for ongoing decision making about this issue should properly be discussed between claimants and the Crown in the future. "Only then will tapu areas on the maunga be guaranteed of appropriate protection."<sup>22</sup>

The vast majority of the Tūroa ski field also sits on the land block of Rangipo North 8 (refer image 6). In closing submissions to the Waitangi Tribunal Te Kāhui Maunga report authors note:

*“The Crown acknowledged that it Failed to purchase, consult, or compensate the owners of Rangipō North 8 when it proclaimed the establishment of the National Park. We acknowledge the Crown’s concession on this matter. This has resulted in the effective confiscation of a significant parcel of land from the tribes concerned. Located on this land are wāhi tapu of Whanganui Māori, including Paretetaitonga and Te Waiamoe, two of the most sacred sites.”<sup>23</sup>*

The hapū of Patutokotoko are unified with Ngā Iwi o te Kāhui Maunga in our belief that any proposed solution/s for the ski fields of Tūroa and Whakapapa must, primarily:

- Uphold all our settlement agreements
- Not prejudice future settlement negotiations related to the Tongariro National Park
- Not prejudice the outcome of the terms and conditions of any concession license/s to be issued.

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<sup>22</sup> Ministry of Justice. (2013). Te Kāhui Maunga: the National Park District Inquiry Report. Lower Hutt, Waitangi Tribunal. III. 864.

<sup>23</sup> Ministry of Justice. (2013). Te Kāhui Maunga: the National Park District Inquiry Report. Lower Hutt, Waitangi Tribunal. II. 531.

This as evidenced above, an abject lack of clarity, factual information and conflicting statements from the applicant combined with, a lack of a CIA and dated supplementary reports makes it almost impossible for Patutokotoko to robustly assess this PTL application even if we actually had been given adequate consideration, time and resource that should be afforded to all iwi and hapū.

If PTL had only started their application earlier and committed to a robust pre-consultation programme over the last eight months, rather than four kanohi ki te kanohi hui and a few emails containing information that has clearly now changed, we suggest some of these issues would have been resolved.

Do Patutokotoko support the issuing of this license and related concession? Kāo, and struggle to see how the Crown can consider issuing this licence without requiring the bare minimum in factual information and related reports.

This application notes the History of Tūroa ski field – without once mentioning the actual history of Te Pēhi Turoa, Te Pēhi Pakoro Tūroa or Tōpia Turoa and, we are still working with MBIE and Te Arawhiti on the transfer of the intellectual property right of our ingoa registered by RAL back to descendants of Tūroa.

It is suggested that in these circumstances, and noting the Treaty of Waitangi clause in the Conservation Act and provision of mechanisms He Kaupapa Rangatira in the TNPMP the Department of Conservation should consult with mana whenua in a way that acknowledges that the underlying whenua has never been purchased nor compensated for – and act in a manner akin to a trustee/beneficiary relationship.

### **Moving forward to a solution**

Patutokotoko, like all Ngā Iwi o Kāhui Maunga, appreciate the important role the ongoing, intergenerational operation of the ski fields bring to our rohe.

With the formal withdrawal of Whakapapa Holdings Limited publicly announced this week and the clear issues PTL have with this application we, the collective representatives of Patutokotoko, would like to take this opportunity to formally offer the Crown \$1 for the purchase of Whakapapa and Tūroa ski fields.

A caretaker collective of Iwi, hapū and whānau bought together to ensure that:

- Uphold all our settlement agreements
- Not prejudice future settlement negotiations related to the Tongariro National Park.

Finally before any decisions are made by the Minister on this application we wish to have an audience with the decision maker and the applicant to see if we can resolve our issues.

We wish to speak to this submission.

Ngā mihi nui

Te Kurataiaha Waikau-Tūroa  
Te Moananui Rameka  
Hayden Tūroa  
Nicholas Tūroa

Map 9 Turoa Ski Area (with Rangipo North 8 shown)

Wai 1130, A7

OFFICIAL

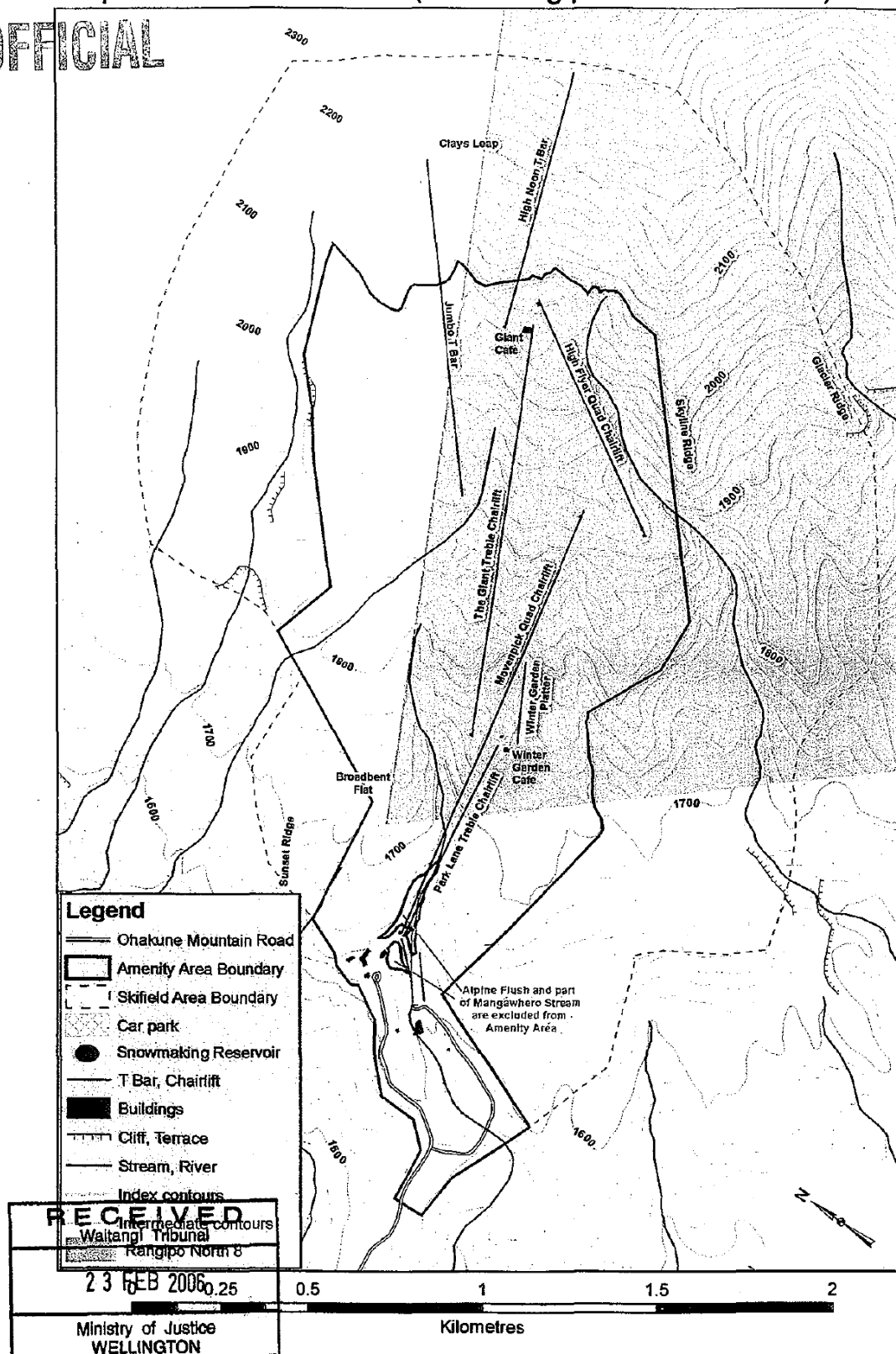


Image 6

30 October 2023

# PATUTOKOTOKO POSITION PAPER RUAPEHU ALPINE LIFTS

## 1. GENERAL COMMENTS

The purpose of this position paper is to assist in the ongoing discussions between the Crown, the hapū of Patutokotoko and Ngā Iwi o te Kāhui Maunga regarding the finalisation of an agreeable solution for Ruapehu Alpine Lifts.

The hapū of Patutokotoko are unified with Ngā Iwi o te Kāhui Maunga in our belief that any proposed solution/s must, primarily:

- Uphold all our settlement agreements
- Not prejudice future settlement negotiations related to the Tongariro National Park
- Not prejudice the outcome of the terms and conditions of any concession license/s to be issued.

As previously communicated with the Crown, the position of Patutokotoko, as hapū at place, has always been that adequate consideration, time, resource and consultation should be afforded to all iwi and hapū ahead of the finalisation of any proposed transition plan/s.

Patutokotoko has repeatedly raised our concerns throughout this process and continued to experience a significant lack of information, time and engagement from the Crown. Despite being safeguarded through a number of te Tiriti o Waitangi settlement and numerous governmental acts, policies, management plans and laws, we as tangata whenua have been continually compelled to advocate for the protection of our rights and interests.

It is our position that owing to the ski fields of Whakapapa and Tūroa being situated entirely within the original tuku or “gift” area – rather than the arbitrarily defined Department of Conservation “Pristine Area” – Patutokotoko requests that no further decisions are made or endorsed, whether in principle or otherwise, until we have been granted the time, space and resource required to continue exploring the opportunity a Ngā Iwi o te Kāhui Maunga transition plan – a pan-iwi led solution to the ongoing operations of the ski fields with the Crown and associated agencies.



## 2. WHO ARE PATUTOKOTOKO?

- Commonly now known as Patutokotoko, Ngāti Hekeawai is a Central North Island/Whanganui iwi
- For the purposes of Treaty Settlement, Patutokotoko is now categorised as a pan-iwi tribe, a collective of hapū descending from tūpuna Tamakana, Tamahaki, Uenuku, Tukaioa and Hekeawai and, more recently recognised through ahurewa and paramount chief Te Pēhi Tūroa (I) (d. 1845)
- Patutokotoko is named hapū at place across four settlement Large Natural Groupings: Te Korowai o Wainuiārua<sup>1</sup>, Ngāti Hāua<sup>2</sup>, Ngāti Rangi<sup>3</sup>, and Whanganui Lands Settlement<sup>4</sup>, along with Te Awa Tupua<sup>5</sup> and, through these, the upcoming Tongariro National Park (Te Kāhui Maunga) and Whanganui National Park settlements. We also have overlapping interests through our lands in the settlements of both Tūwharetoa and Mōkai Pātea.
- Prior to the 1860s, Patutokotoko often advocated for peace acting as a vehicle for cooperation between Whanganui and Central North Island iwi, including during military action against both neighbouring iwi and the Crown. However by 1865, our tribe was labelled by the Crown as hauhau rebels and were forced to defend our lands on a number of occasions against both the Crown and kūpapa.

## 3. TONGARIRO NATIONAL PARK SETTLEMENT

The rights of iwi and hapū at place, including those of Patutokotoko, have been formally recognised by the Crown across a number of iwi settlement acknowledgments pertaining to the Tongariro National Park. Some of these include that:

- The Crown acknowledges that despite being aware of the significance of Ruapehu maunga to the iwi of Te Korowai o Wainuiārua, it did not consult them in relation to reserving the mountain peak for the purposes of creating a national park before or after opening discussions with another iwi<sup>6</sup>
- The Crown acknowledges that it did not carry out the terms of the Waimarino block purchase deed and arrangements made during negotiations for setting aside reserves for the hapū of Te Korowai o Wainuiārua and that this was a breach of te Tiriti o Waitangi/the Treaty of Waitangi and its principles. The Crown further acknowledges that: (b) large parts of the western slopes of Ruapehu maunga up to its sacred peak which the Crown acquired without the consultation or consent of the iwi of Te Korowai o Wainuiārua despite being aware of its significance to them<sup>7</sup>
- The Crown also acknowledges that from 1907 it failed to include the iwi of Te Korowai o Wainuiārua in the ongoing management arrangements of the Tongariro National Park, and failed to respect their rangatiratanga and kaitiakitanga over the maunga, and this was a breach of te Tiriti o Waitangi/the Treaty of Waitangi and its principles<sup>8</sup>
- The Crown also deeply regrets how it created a national park around Ruapehu, Ngāuruhoe and Tongariro without considering or consulting Uenuku, Tamakana and Tamahaki. You have never had a role in the management of these sacred taonga, and for

these acts and omissions, and the severe prejudice you have suffered as a consequence, the Crown is deeply sorry.<sup>9</sup>

## 4. THE TUKU

### What was “gifted”?

In January 1887 the Native Minister agreed to pass legislation for the full protection of ngā manga tapu. Varying in area, Crown documents also make reference to the entire mountains forming the “noble gift”. Publications from the time refer to large areas of our rohe to be protected, the authors of the Te Kāhui Maunga Inquiry Report have identified:

- William Grace’s report of 3 March 1886 refers to circles of two and three [Ruapehu - mile radius around the peaks of Ruapehu, Ngāuruhoe and Tongariro
- Newspaper reports of February 1887 refer to Te Heuheu and the chiefs of Ngāti Tūwharetoa gifting a two-mile radius around Tongariro and Ngāuruhoe, and similar for Ruapehu
- The 1887 Tongariro National Park Bill refers to a radius of four-miles on Ruapehu, and three-miles on Tongariro and Ngāuruhoe
- The deeds of conveyance prepared in June 1887 were for the whole mountain blocks – Tongariro No 1 and 2, Ruapehu 1,2 and 3
- The 1894, No 55 Tongariro National Park Act refers, in the schedule, “a circle around Trig. H on Ruapehu having a radius of 4 miles from that point” and three-miles on Tongariro and Ngāuruhoe. *Refer Appendix 1*

Regardless of size, all of the above radii are larger than the Tongariro National Park Management Plan 2006-16 (TNPMP) defined “Pristine Area” of a [roughly circular area situated at a 1.24-mile (two-kilometre) radius down from Trig. point H on Ruapehu. *Refer Appendix 1*

Crown maps record the sites of Ruapehu 1A and 2A, Ngāuruhoe 1B and 2B and Tongariro 1A and 2B as being “gifted” by Te Heuheu while the land blocks 1B, 2B, 1C and 2C are noted as being “gifted” from local chiefs of rather than Te Heuheu alone. All these named chiefs have origins to Patutokotoko <sup>10</sup>.

Patutokotoko acknowledge that while there are many issues yet to be resolved through the Te Kāhui Maunga settlement negotiations pertaining to the taking and alienation from our lands, Patutokotoko fully support the kōrero of our whanaunga and agree that:

- The evidence is overwhelming that Te Heuheu was acting to protect our mountains and waterways and that the Crown has accepted this was his intention<sup>11</sup>.



When considering the size of the *tuku*, “pristine” or “gift” area, it is the view of Patutokotoko that a minimum start point for any such negotiation should be that of the original legislation, the circular area situated at a radius of no less than four-miles from Trig. point H on the summit of Ruapehu.

### **The “Pristine Area”**

The TNPMP refers to the “Pristine area” on Ruapehu as being above 2,300-metres with the exception of the Tūroa ski field area where this boundary extends to 2,325-metres. Equating to a radius of two-kilometers (1.24-miles) is an wholly arbitrary distance baring no factual resemblance to any of the actual “gift” distances discussed above.

This discrepancy is explained by DOC’s Paul Green when giving evidence at the National Park Hearing 8. Under cross-examination he was asked why the TNPMP does not have an exclusion zone that equates to the original “gift” area? His reply was that, “there’s been a number of facilities that have been in the gift area since the early 1960s through to today and if that was to be applied in that sense it would certainly [be an issue for considering whether there is a ski field at Whakapapa so we’re dealing with a little bit of a historical situation, I suspect, in respect of the relationship of the ski field to the “gift” area that’s been in place since the 1950s.”<sup>12</sup>

### **“Pristine Area” Special Provisions**

Regardless of size, the TNPMP acknowledges the primary reason for best practice pro-active management of the DOC created “Pristine Area” is to recognise that, “for tangata whenua the mountains are ancestors: they have come from and will return to them. The mountains are tapu and as such are sacred places” and, that one of the reasons this space is to be protected is because of the historical and cultural heritage, “as the ‘Gift’ areas which constituted the beginning of the park”<sup>13</sup>. The TNPMP lists DOC’s key objectives pertaining to the “Pristine Area” as to:

- Protect Tongariro National Park’s pristine areas in perpetuity in their unmodified existing states
- Seek restoration of pristine areas to their original states where they have been affected by human-induced activities
- Avoid the adverse effects of development and use which undermine the pristine zone experience sought by park visitors
- Avoid the adverse effects of intensive recreation use by park visitors
- Protect historical and cultural heritage within pristine areas.<sup>14</sup>

### **Te Kāhui Maunga Enquiry Report**

The authors of the National Park Inquiry Report state that it is:

- Entirely inappropriate for the Department of Conservation to continue to decide, unilaterally what the extent of the restricted area should be
- That a Treaty-compliant process for ongoing decision making about this issue should properly be discussed between claimants and the Crown in the future. "Only then will tapu areas on the maunga be guaranteed of appropriate protection."<sup>15</sup>

### **UNISCO Duel World Heritage Status**

In considering the Department of Conservation's application for UNISCO Cultural Heritage Status they state:

- Recreation and tourism is limited by a requirement for any infrastructure to be sited outside the World Heritage Area with the exception of existing tracks and huts and other facilities required for essential park management. Two small wilderness areas ensure that some parts of the World Heritage Area are free from any facilities<sup>16</sup>.

In awarding their citation the UNISCO board stated that:

- The Department of Conservation was committed to a consultation process that will support an exemplary code of ethical conduct and field conservation practice that emphasise social responsibility and cultural sensitivity<sup>17</sup>.

Patutokotoko dispute the factual nature of both these statements as, the Department of Conservation's Pristine Area boundaries are a fabrication wholly designed to:

- Avoid the "historical situation"<sup>18</sup> created through the construction and ongoing management of the Ruapehu ski fields
- Ensure all ski field operations could continue business-as-usual rather than requiring the implementation of best practice cultural and environmental models
- Negate the need for all ski field operations to uphold the "Pristine Area" special provisions as contained in the TNPMP.

## **5. TONGARIRO NATIONAL PARK NEGOTIATIONS**

Ngā Iwi o te Kāhui Maunga, including the hapū of Patutokotoko, are currently entered into Te Kāhui Maunga negotiations with the Crown. In considering the highly disputed nature of the tuku area boundaries it is the position of Patutokotoko that any discussions pertaining to the "gift" area should be done so unencumbered. Current consideration being given by the Crown pertaining to the commercial activities associated with Whakapapa and Tūroa ski fields will likely prejudice our negotiations in a way that could impact our ability to fully assert our tino rangatiratanga and kaitiakitanga over the Tongariro National Park, a provision that is provided for Patutokotoko hapū across multiple Deeds of Settlement and Agreements in Principle.

## 6. CONCLUSION

The ongoing inability of the Crown and associated agencies to give meaningful effect to the principles of te Tiriti o Waitangi while honouring multiple historic and future settlements in relation to Tongariro National Park, the rohe of Patutokotoko and how this pertains to the Ruapehu Alpine Lifts discussions could possibly be explained by an abject lack of understanding of what is a highly complex post-settlement space involving multiple iwi.

In 2006, Te Korowai o Wainuiārua (Uenuku), including the hapu of Patutokotoko were recognised as tangata whenua of the Tongariro National Park through a footnote in the TNPMP. “Ngāti Uenuku, from the southern side of Mount Ruapehu, have asked that their status as tangata whenua in that area be recognised in the plan. They have submitted that the Ngāti Uenuku tribal domain is comprised of Paretetaitonga peak and the south-west and south-east flanks of Mount Ruapehu from that peak. The Tongariro National Park Treaty of Waitangi claims process may clarify mana whenua claims.”<sup>19</sup>

On June 6, 2023, MBIE sent an email to DOC suggests Crown departments are still confused as to the settlement rights of multiple iwi across the Park. “Just wondering if you have any specific wording we can use regarding why Ngāti Tūwharetoa, Ngāti Rangī, Ngāti Hāua and Ngāti Uenuku are the consulted iwi regarding the concessions? I had a quick skim through the TNPMP but I could only see Ngāti Tūwharetoa and Ngāti Rangī mentioned as kaitiaki”<sup>20</sup>. Just two months later, on 29 July Minister Little signed Te Tihi o te Rae, our Te Korowai o Wainuiārua (Uenuku) Deed of Settlement with iwi, hapū and whānau at Raetihi Marae.

It is our position that, as evidenced above, Whakapapa and Tūroa ski fields are clearly situated in our rohe and within the original “gift” area rather than, the current arbitrarily determined DOC defined “Pristine Area” and, as named hapū across multiple settlements Patutokotoko have the right to speak and raise this major settlement issue.

As recommended by the authors of the Te Kāhui Maunga: the National Park District Inquiry Report, “a Treaty-compliant process for ongoing decision making about this issue should properly be discussed between all claimants and the Crown in the future. Only then will tapu areas on the maunga be guaranteed of appropriate protection”<sup>21</sup>.

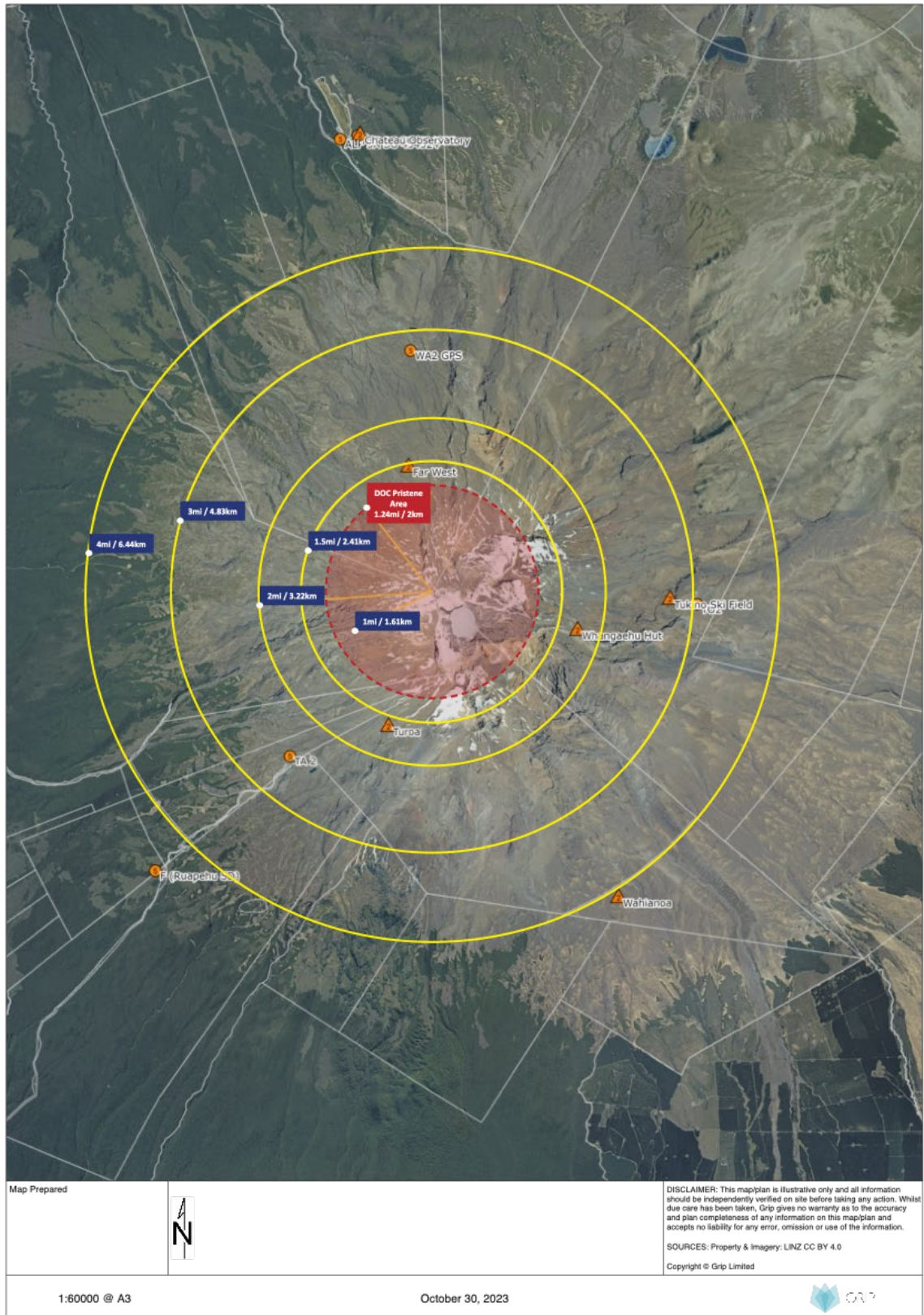
As the issue of the “gift area” currently remains unresolved and is major issue required to be addressed through the current settlement negotiations, as hapū at place, it is highly unlikely Patutokotoko would currently be supportive of any concession application/s that would not:

- Uphold all our Settlement agreements
- Prejudice future settlement negotiations related to the Tongariro National Park.

Because of this position, we reiterate that no further decisions should be made or endorsed by the Crown and associated agencies, whether in principle or otherwise, until we have been

granted the time, space and resource required to continue exploring the opportunity a Ngā Iwi o te Kāhui Maunga transition plan – a pan-iwi led solution to the ongoing operations of the ski fields until the conclusion of the Te Kāhui Maunga negotiations.

## 7. APPENDIX 1



- 
- <sup>1</sup> New Zealand Government. (2023). Te Tihi o te Rae - Deed of Settlement of Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 188.
- <sup>2</sup> Ministry of Justice. (2022). Te Whiringa Muka - Agreement in Principle to settle Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 97.
- <sup>3</sup> Ministry of Justice. (2018). Rukutia Te Mana - Deed of Settlement of Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 144.
- <sup>4</sup> Ministry of Justice. (2019). Te Tomokanga ki te Matapihi - Agreement in Principle to settle Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 74.
- <sup>5</sup> New Zealand Government. (2017). Te Awa Tupua (Whanganui River Claims Settlement). Wellington, New Zealand Government. 70.
- <sup>6</sup> New Zealand Government. (2023). Te Tihi o te Rae - Deed of Settlement of Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 116.
- <sup>7</sup> New Zealand Government. (2023). Te Tihi o te Rae - Deed of Settlement of Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 118.
- <sup>8</sup> New Zealand Government. (2023). Te Tihi o te Rae - Deed of Settlement of Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 118.
- <sup>9</sup> New Zealand Government. (2023). Te Tihi o te Rae - Deed of Settlement of Historical Claims. Ministry of Justice. Wellington, Ministry of Justice. 122.
- <sup>10</sup> Ministry of Justice. (2013). Te Kāhui Maunga: the National Park District Inquiry Report. Lower Hutt, Waitangi Tribunal. III. 494.
- <sup>11</sup> Waitangi Tribunal. (2006). Tongariro National Park Inquiry, Opening Submissions on behalf of the Crown. 8.
- <sup>12</sup> Waitangi Tribunal. (2006). WAI 1130 – National Park Hearing 8 – WAI1130 #4c.1.12. 461.
- <sup>13</sup> Department of Conservation. (2006). Tongariro National Park Management Plan. 120.
- <sup>14</sup> Department of Conservation. (2006). Tongariro National Park Management Plan. 121.
- <sup>15</sup> Ministry of Justice. (2013). Te Kāhui Maunga: the National Park District Inquiry Report. Lower Hutt, Waitangi Tribunal. III. 864.
- <sup>16</sup> Evidence to the Waitangi Tribunal re the Tongariro National Park Inquiry of Doris Johnson, Acting General Manager (Policy), on behalf of the Department of Conservation. (2006). WAI 1130 H002. 11-12.
- <sup>17</sup> UNESCO World Heritage Centre. (1993). World Heritage List Tongariro. No.421rev.
- <sup>18</sup> Waitangi Tribunal. (2006). WAI 1130 – National Park Hearing 8 – WAI1130 #4c.1.12. 461.
- <sup>19</sup> Department of Conservation. (2006). Tongariro National Park Management Plan. 11.
- <sup>20</sup> Hill, E. (2023). Wording on consulted iwi. S. Wrenn, New Zealand Government.
- <sup>21</sup> Ministry of Justice. (2013). Te Kāhui Maunga: the National Park District Inquiry Report. Lower Hutt, Waitangi Tribunal. III. 864.



## Hui Notes

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12 May 2023

Rt Hon Chris Hipkins  
Prime Minister  
Parliament Buildings  
Private Bag 18041  
WELLINGTON 6160

Dear Prime Minister

Ruapehu Ski Fields – Ownership Change

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CC: Hon Kiri Allan – Minister for Regional Development  
Hon Willow-Jean Prime – Minister of Conservation  
Hon Barbara Edmonds – Minister of Economic Development  
Hon Willie Jackson - Minister for Māori Development  
Hon Nanaia Mahuta – Associate Minister for Māori Development