

Cultural Considerations for the Working Group and Rotorua Lakes Council

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Recovered Water Management Solution Project

Purpose

This paper summarises the key themes, concerns, expectations and conditions raised by iwi, hapū, Māori organisations, landowners and community stakeholders through written correspondence received during Stages 1 and 2 of the Recovered Water Project Working Group process (October 2025 to September 2026). It is intended to assist the Working Group in evaluating options and identifying matters requiring consideration throughout the assessment, engagement and decision-making process.

1. Cultural and Environmental Bottom Lines

There is consistent opposition to any proposal that may adversely affect the mauri of water, culturally significant environments, or taonga ecosystems. Multiple parties emphasise that Te Mana o te Wai should be a primary guiding principle for all assessments and decisions.

Considerations

- How each option gives effect to Te Mana o te Wai.
- Potential impacts on:
 - Lake Rotorua
 - Ōhau Channel
 - Springs and aquifers
 - Wetlands
 - Streams and waterways
 - Kaituna Catchment
 - Puarenga Stream catchment
 - Culturally significant sites and landscapes.
- Protection and enhancement of mauri using both cultural and scientific measures.
- Identification of cultural "no-go" or exclusion areas before options are shortlisted.
- Long-term protection of taonga water bodies for future generations.

2. Lake Rotorua Discharge

A clear and recurring theme is opposition to any discharge of recovered water into Lake Rotorua, regardless of treatment levels. This position is explicitly stated by several iwi and organisations.

Considerations

- Cultural acceptability of any activity resulting in wastewater entering Lake Rotorua.
- Potential direct and indirect pathways to the lake.
- Alignment with Te Tuapapa o ngā Wai o Te Arawa.
- Impact on the lake's cultural, environmental and ecological values.
- Assessment of cumulative effects on an already stressed lake ecosystem.
- Ability to secure social licence and iwi support for any option involving the lake.

3. Land-Based Disposal and Forest Options

Stakeholders hold differing views on land disposal. While some view land disposal as preferable to lake discharge, others express significant concerns regarding continuation of discharge onto existing or proposed whenua.

Considerations

- Potential impacts on Puarenga Stream and connected catchments.
- Effects of spraying and land application methods.
- Risks to soils, groundwater and ecosystems.
- Existing environmental impacts associated with current disposal practices.
- Whether alternative land-based solutions represent genuine improvements over the status quo.
- Need for comprehensive environmental and cultural assessments before advancing land-based options.

4. Mana Whenua Rights, Interests and Decision-Making

Many submissions emphasise the importance of recognising mana whenua interests, kaitiakitanga responsibilities, and Treaty-based relationships.

Considerations

- Identification of impacted mana whenua and affected landowners.
- Appropriate recognition of mana whenua authority within relevant rohe.
- Early engagement rather than consultation after options are substantially developed.
- Shared decision-making opportunities where cultural effects are significant.
- Respect for existing whakapapa relationships with land and water.
- Ensuring engagement processes reflect Treaty principles.

5. Engagement and Process

Several submitters expressed concerns regarding engagement processes and timing of discussions.

Considerations

- Whether all affected parties have been identified and engaged early enough.
- Transparency of the Working Group process.
- Access to information, technical reports and modelling.
- Providing regular updates and decision-point hui.
- Avoiding situations where substantial work is undertaken before engagement with key landowners or mana whenua occurs.
- Maintaining trust and credibility in the process.

6. Cultural Impact Assessment

There is strong support for cultural assessments being mandatory across all shortlisted options.

Considerations

- Cultural impact assessment requirements for all options.
- Appropriate cultural indicators and assessment frameworks.
- Integration of mātauranga Māori alongside technical assessments.
- Weighting of cultural criteria within the Multi-Criteria Analysis (MCA).
- Independent cultural review where appropriate.

7. Environmental Health and Public Health Concerns

Community correspondence raised concerns about contaminants, treatment effectiveness, and potential impacts on food gathering resources and public health.

Considerations

- Treatment effectiveness for contaminants of emerging concern.
- Risks associated with PFAS, pharmaceuticals and micropollutants.
- Potential impacts on aquatic ecosystems and food gathering areas.
- Scientific evidence supporting safety assumptions.
- Public confidence in treatment standards and monitoring regimes.
- Communication of risks and uncertainties

8. Future Regulatory and Compliance Requirements

Future wastewater standards and regulatory settings were highlighted as an important consideration.

Considerations

- Alignment with current and emerging wastewater standards.
- Future National Engineering Design Standards.
- Long-term consenting requirements.
- Regulatory certainty and adaptability.
- Ability to meet future environmental expectations over the life of the project.

9. Long-Term Sustainability and Resilience

Several submissions emphasised the importance of a solution that remains fit for purpose over multiple decades.

Considerations

- 50+ year planning horizon.
- Climate resilience.
- Population growth and future demand.
- Environmental sustainability.
- Intergenerational impacts.
- Ability to avoid future re-litigation of the issue.

10. Property, Landowner and Commercial Interests

Several correspondents raised concerns regarding land ownership, gifted reserve status, commercial arrangements and land use rights.

Considerations

- Landowner consent and expectations.
- Existing legal obligations attached to land.
- Gifted Reserve status and associated obligations.
- Potential requirements for new commercial arrangements.
- Property rights and future land use implications.
- Landowner willingness to participate in solution development.

11. Alternative Solutions and Innovation

Several stakeholders have encouraged broader consideration of alternative approaches rather than focusing on a limited range of disposal options.

Considerations

- Evaluation of innovative treatment and reuse solutions.
- Water recovery and beneficial reuse opportunities.
- Advanced polishing technologies.
- Hydrogen and energy-related opportunities proposed by stakeholders.
- Whether all reasonable alternatives have been adequately investigated before narrowing options.

12. Strategic Risks for Council

The correspondence collectively identifies several strategic risks requiring management.

Risks to Monitor

- Cultural risk.
- Relationship and trust risk.
- Reputational risk.
- Legal challenge risk.
- Consent and regulatory risk.
- Land access and landowner approval risk.
- Environmental risk.
- Cost escalation and project delay risk.
- Loss of social licence to operate.
- Treaty relationship risk.

Recommended Working Group Focus

Across all correspondence, four themes consistently emerge:

1. Protect the mauri of water and culturally significant environments.
2. Engage mana whenua and affected parties early, openly and meaningfully.
3. Undertake robust cultural, environmental and technical assessments before narrowing options.
4. Identify a long-term solution that is environmentally sustainable, culturally acceptable, legally robust, and capable of securing enduring community support.

Summary

The strongest message from the correspondence is not actually about a preferred solution. It is that stakeholders are signalling they will judge Council as much on how the process is conducted as on what option is selected. Several letters identify process failures, engagement deficiencies, and concerns around predetermined outcomes. If the Working Group does not maintain trust and transparency, even a technically sound solution may struggle to secure support.