

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT WHANGĀREI**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI WHANGĀREI**

IN THE MATTER **of the Resource Management Act 1991**

AND

IN THE MATTER **of the hearing of submissions on applications
by the Northport Ltd – Port Expansion project at
Marsden Point**

ORAL SUBMISSION FOR PATUHARAKEKE TE IWI TRUST

31 OCTOBER 2023

MAY IT PLEASE THE COMMISSIONERS:

1. MIHI MIHI

- 1) E te atua, tēnā koe. E ngā ātua o te Taiao o Pukekauri ki uta, ki Terenga Parāoa ki tai; e rangi, e papa, e tane, e tawhiri, e tumatauenga, e hine moana me tangaroa tēnā koutou kātoa. Nau mai haere mai ki te whakaronga me titiro te kōrero o te take o te wā.
- 2) Nau mai haere mai ki ngā wairua o o tatou tupuna huri noa I te whare I tenei ra.
- 3) E te whare o Rangiora, e tu! E te Takahiwai marae e takato nei, tēnā kōrua, e ngā tupuna maunga e tu, e tu, e tu nei! E ngā tupuna awa, e rere, e rere, e rere nei ki te tupuna o Terenga Parāoa.
- 4) Ki ngā komihana, e komihana Wikaira, e komihana Hill, e komihana Leersnyder, nau mai, piki mai, haere mai ki te marae o Patuharakeke.
- 5) E te whānau, e te taitamariki, e ngā whanaunga o Terenga Parāoa, tēnā koutou. E ngā manuhiri o ngā hau e wha, tēnā koutou, noreira, tēnā koutou, tēnā koutou, tēnā ra koutou kātoa.
- 6) Ko Pukekauri me Manaia tōku maunga, ko Takahiwai tōku whenua, ko Takahiwai tōku awa, ko Takahiwai tōku marae, ko Terenga Parāoa tōku moana. Ko George Milner tōku pāpā o Ngāti Manu, ko Kariti Milner nee Pirihi o Patuharakeke tōku māmā, ko Gail Webb tōku hoa wahine, ko Jayden raua ko Tiarna tōku taitamariki, ko Dave Milner tōku ingoa. Ti hei wā mauri ora!

INTRODUCTION

- 7) My name is David Richard Baker Milner. Set out below is my whakapapa some 19 generations back to Manaia II and only depicts a snippet of my whakapapa that includes my connection to our natural physical environment such as our maunga, our awa, our whenua and our takutai moana. There are a further 17 generations of my whānau line that connects us back to pre waka migration to Manaia I.

- i. Manaia II
- ii. Rangitakotoroa
- iii. Whakaaturangi
- iv. Kauaua
- v. Kuramakoha
- vi. Te Rangihokaia
- vii. Te Aooterangi
- viii. Toke
- ix. Karawai
- x. Te Aoheiwawa
- xi. Kamo
- xii. Te Taotahi
- xiii. Te Whakaariki
- xiv. Te Pirihi
- xv. Wiki Te Pirihi
- xvi. Maki Te Pirihi
- xvii. Henare Pirihi
- xviii. Crete Milner (nee Pirihi)
- xix. David Milner
- xx. Jayden and Tiarna Webb Milner (taitamariki)

- 8) This whakapapa goes back beyond the restrictions of the layers of colonisation and reflects the intergenerational association with our takutai moana. The layers of colonisation such as multiple Crown legislative Acts including the constraints within the policies and plans associated to this application demonstrates multiple impacts causing incremental steps of alienation and severance from our wāhi tapū, wāhi tupuna, wāhi wairua sites and areas of significance of our taonga and culture that make up this place of significance.
- 9) We, Patuharakeke, maintain a clear position that we hold the best interests of our whanaunga whakapapa and common interests in regard to environmental management in our rohe, and for our whanaunga to hold our whakapapa and common interests, in their rohe.

EXPERIENCE

- 10) The mātauranga (Māori knowledge, wisdom) and mohiotanga (understanding, comprehension) I have gained through knowledge passed down and learned knowledge is reflected in **Appendix 1** accompanying this submission. It provides examples of experience and roles I have that leads me to this hearing today.

SCOPE OF SUBMISSION

- 11) In my experience informal cultural evidence and submissions have carried very little weight under the constraints of a colonial system in the context of L.A.W. Māori as the indigenous people of Aotearoa have been forced to assimilate away from LORE or Tikanga in the past however, as our legal counsel has referred to in section 4.6 of his Legal Submission¹, and I quote:

“Tikanga was the first law of our country, it forms part of the common law and continues to shape and regulate the lives of Māori.² **Tikanga is defined in s 2 of the RMA as “Māori customary values and practices”, and also includes “custom law”.**

- 12) The nature of the application from Northport will create an increased existential threat of our Patuharakeketanga for this part of our takutai and moana, which holds us all to account therefore, we must understand the mana of Tikanga in this application to recognise the magnitude of risk this has on our culture.

¹ *Legal Submissions for Patuharakeke Te Iwi Trust, B Matheson, 25 Oct 2023*

² *Ellis v R [2022] 1 NZLR 239 (SC), at [22]*

- 13) From an environmental and cultural perspective, Poupouwhenua, Terenga Parāoa, and all taonga that rely on these two rangatira, have encountered intergenerational disrespect, devastation and trauma from a colonial concept of breaking in the land, draining the repo and non-sustainable development for the betterment of the country, region, and assimilating mana whenua, mana moana and some factions of our communities into this unbalanced approach.
- 14) I support the submissions from our experts, our whānau, and especially our taitamariki in opposition to the application. I also acknowledge the submissions and evidence from our likeminded whanaunga hapū, iwi and hapori whānui.
- 15) Today, I will provide further cultural context to the Patuharakeke Te Iwi Trust expert technical evidence and submissions for all and sundry to get an understanding of the detrimental impacts that will add to the cumulative impacts that occur with this type of approach.
- 16) I will attempt to be as succinct as possible to cover the following key points to highlight the gaps that remain unresolved and therefore leads me to oppose the application. Please bear in mind under tikanga, each of these demand wānanga processes so I will try my best to put them into paragraphs or bullet points and add context through unscripted kōrero.
 - (a) Tikanga – I will share some key activities that provide examples of tikanga from my personal experiences that I practice in my life and mahi;
 - (b) Share my perspective of our whakapapa to te Taiao and taonga and therefore our responsibility as tangata tiaki or kaitiaki³;
 - (c) Sharing my understanding of rangatiratanga of taonga species;
 - (d) The broader impacts on our Patuharakeke Strategic Pou;
 - (e) Anchoring the magnitude of cultural effects on our values, principles and the short comings through a mitigation hierarchy to the key outstanding impacts from my perspective presented by our technical and cultural experts.

³ Tangata tiaki or human guardians, kaitiaki also known as deity or spiritual guardians for some hapū iwi.

TIKANGA

- 17) The Supreme Court case of *Ellis v R* [2022] NZSC 114 represented an elevation of tikanga in law – recognising tikanga as the original law of Aotearoa that constitutes a separate legal framework⁴. The decision solidifies earlier indications from lower courts, such as *Ngāti Whātua Ōrākei Trust v Attorney-General* [2022] NZHC 843, which also recognised tikanga as an independent legal framework.
- 18) Tikanga in relation to the Northport resource consent application, are the customary protocols and practices hapū and iwi are guided by tupuna kōrero tuku iho to uphold respect, decency, integrity and hauora for our environment and the rangatira effected by the activities proposed in this consent application.
- 19) Rangatira tupuna whenua - Poupouwhenua, rangatira tupuna moana - Terenga Parāoa, and other rangatira such as Manu (birds), Flora such as Pingao, marine mammals such as Parāoa (Sperm Whales) and Aihe (Dolphins), kai moana such as Kokota (pipi), tuangi (cockles), kutai (mussels) and their kainga or habitat also have a significant role to uphold in their part of the taiao.
- 20) Kokota at Mair and Marsden Banks at Poupouwhenua for example, hold a rangatira role in their kainga or habitat and their part of the Terenga Parāoa system as does many other taonga in the proposed reclamation area, and adjacent to the areas of the proposed construction and maintenance activities.
- 21) Just because these activities have already occurred in the past, does not mean they were supported by mana whenua mana moana hapū iwi.
- 22) The impacts on these rangatira in their own parts of the taiao from reclamation, dredging activities, and therefore loss of life, kainga, and *their* world, as referred to in our legal counsel evidence at paragraph 1.4⁵.

⁴ Dewes, T. A., Graham, J., & Jones, R. (2022, November 30). *Weaving tikanga Māori and the common law into new cloth*. Chapman Tripp. <https://chapmantripp.com/trends-insights/weaving-tikanga-maori-and-the-common-law-into-new-cloth/>

⁵ “The stretch of foreshore to be destroyed by the proposed reclamation is sandwiched between two industrial activities (the refinery and the port). The applicant would have you see this environment as so compromised that it is of little value: my client considers it to be complete opposite – in these circumstances its retention and protection becomes even more important”.

23) In the hierarchy of obligations for the concept of Te Mana o te Wai in the NPSFM⁶ – “*first, the health and wellbeing of the water bodies and freshwater ecosystems*” is a tikanga approach. It is not a new approach in te Ao Māori however, it is a good example of the colonial system beginning to recognise a te Ao Māori tikanga worldview. There are other te Ao Māori concepts being included in National Policy Statements that support section 6a and e⁷, s 7a and d⁸ and of course s8⁹ of the RMA however, this is just one example.

WHAKAPAPA

24) Author Elsdon Best provides insight into “*An Account of the Cosmogony, Anthropogeny, Religious Beliefs and Rites, Magic Folk Lore of the Māori Folk of New Zealand.*”¹⁰ A te Ao Māori worldview expresses the concept that we whakapapa to the environment and the taonga within. I relate wholeheartedly to Te Awa Tupua, Whanganui Awa, recognised as a legal person and has all the rights, powers, duties, and liabilities of a legal person¹¹. Ko au te awa ko te awa ko au – I am the river and the river is me. Again, this is not a new concept but has been recognised that a water body has been given this status in LAW as it has in LORE.

25) Patuharakeke regard Poupouwhenua and Terenga Parāoa as having the same whakapapa connections to us and whanaunga hapū and iwi as Te awa Tupua does to the hapū iwi there.

26) To offer a cultural perspective of the whakapapa connection between ira atua (Ātua elements) and ira tangata (human elements), see the following;

⁶<https://environment.govt.nz/assets/publications/National-Policy-Statement-for-Freshwater-Management-2020.pdf>

⁷ <https://www.environmentguide.org.nz/rma/principles/section-6-matters-of-national-importance/>

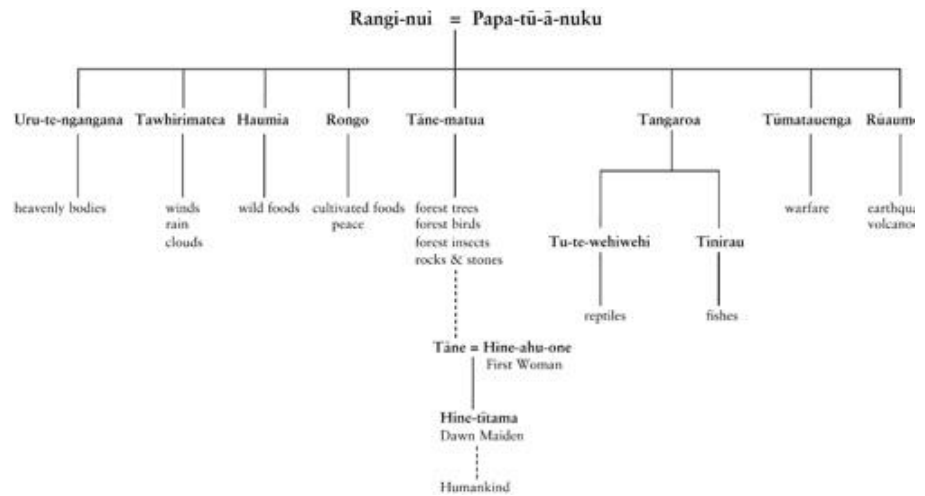
⁸ <https://www.environmentguide.org.nz/rma/principles/section-7-other-matters/>

⁹ <https://www.environmentguide.org.nz/rma/principles/section-8-treaty-of-waitangi/>

¹⁰ Māori Religion and Mythology Part 2 (Best, 1929)

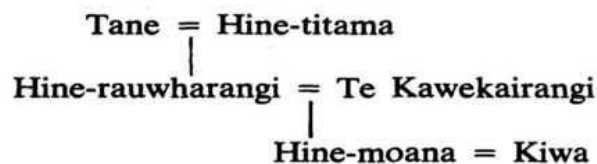
¹¹ <https://www.legislation.govt.nz/act/public/2017/0007/latest/whole.html>

Whakapapa Hineahuone¹²:



27) This publicly available information provides an example of a hapū iwi expression of the whakapapa from ira atua to ira tangata that I have advised and supported in the Tamaki nui-a-Rua and Wairarapa takiwa and will differ slightly dependant on the location across te Ika a Maui and te Waka a Maui or the North and South Islands of Aotearoa NZ.

28) Furthermore, whakapapa connections can be identified through Hine Moana and Kiwa to the whanau o pipi¹³.



29) Further down the whakapapa line, one particular hapū iwi kōrero recognises that the offspring of Te Arawaru and Kaumaihi were the pipi or cockle family, their names are as follows:

Pipi-toretore

Pipi-taiawa *Mesodesma australe (Paphies australis)*

Pipi-tairaki *Mesodesma subtriangulatum (Paphies subtriangulata)*

Pipi-pokai

Pipi-rapakai

Pipi-koura

Pipi-awanga

Pipi-koroputa

¹² M. Roberts, Bradford. Haami, R. Brenton, Terre Satterfield, M. Finucane, M. Henare, M. Hēnare, Whakapapa as a Māori Construct: Some Implications for the Debate over Genetic Modification of Organisms. (published 23 Jan 2004).

¹³ <https://nzetc.victoria.ac.nz/tm/scholarly/Beso2Reli-fig-Beso2Reli255a.html>

Pipi-tuangi *Chione stutchbwyi*
 Pipi-peraro *Tellina glabrella* (probably *Macoma lilliana*)
 Pipi-kararaau
 Pipi-kapeo

- 30) These inseparable examples of whakapapa hold a tuakana teina kin relationship where our rangatira taonga are our tuakana as they were here before us and come from our atua. The death and destruction of our tuakana rangatira and their kainga and world is unacceptable and it is irresponsible for mana whenua mana moana of these special wahi tupuna, wahi tapu, and wahi wairua sites of significance to allow the continuation of this approach.
- 31) The weight of the burden to uphold such a position and try to express the magnitude that these activities have on our taonga, our whakapapa and our relationship are an ongoing intergenerational responsibility of kaitiakitanga. As mentioned at paragraph 2.7 in Ms Juliane Chetham’s Summary Statement “*the effects are permanent and irreversible*¹⁴”.
- 32) The impact of the port activities spans through 7 Generations of Patuharakeke whānau¹⁵. Decisions on lapse terms, consent terms impact on at least 7 generations. These long term proposals remove the right for tamariki generations to participate in decision making therefore it is irresponsible for everyone participating in decision making to support extended long term lapse dates, and resource consent terms in this way.

¹⁴ Summary Statement of Evidence of Juliane Chetham on Behalf of Patuharakeke Te Iwi Trust Board, 30 October 2023.

¹⁵ https://www.researchgate.net/figure/The-classification-of-generations-based-on-a-review-of-the-literature_tbl1_339956049

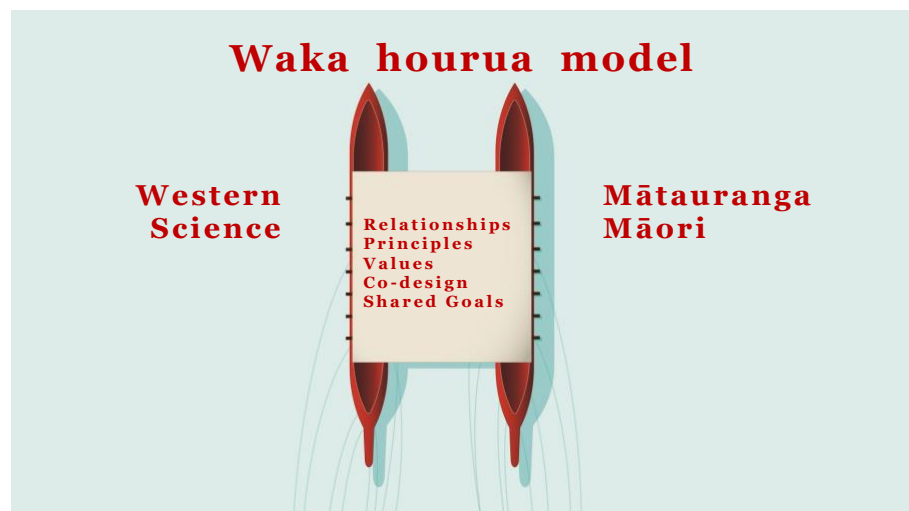
Generation Name	Births Start	Births End	Youngest Age Today*	Oldest Age Today*
The Lost Generation The Generation of 1914	1890	1915	103	128
The Interbellum Generation	1901	1913	105	117
The Greatest Generation	1910	1924	94	108
The Silent Generation	1925	1945	73	93
Baby Boomer Generation	1946	1964	54	72
Generation X (Baby Bust)	1965	1979	39	53
Xennials	1975	1985	33	43
Millennials Generation Y, Gen Next	1980	1994	24	38
iGen / Gen Z	1995	2012	6	23
Gen Alpha	2013	2025	1	5

TAONGA

- 33) Taonga is anchored in s6e of the RMA. As mentioned above, whakapapa intrinsically links rangatiratanga, whakapapa, Taiao, tangata and taonga.
- 34) There is a significant difference and separation between Western Science and Mātauranga Māori. Te Reo Māori, our language, is a taonga, and if used incorrectly or out of context, this can misinterpret the original essence of the kōrero and true meaning of the word/s. Our reo is thrown at things to “Māori’fy” documents, advertising, meetings/hui, roads, projects, etc and in many cases in a genuine attempt to be respectful to te Reo me ona tikanga however, there is only a limited understanding of the kupu and whakapapa of the kupu which then risks traversing into conflicting territory.
- 35) Using the term kaitiakitanga for the purpose of the RMA changed the landscape by creating a word for an action that was an everyday occurrence which otherwise did not need explaining until we needed to define it in the colonial context of the RMA. This was much needed however, it is a good example of the difference

between some hapū iwi using tangata tiaki versus kaitiaki (human guardian element and spiritual deity guardians).

- 36) Other kupu such as mauri and mātauranga are now needing to be measured and are marginalised respectively and are misinterpreted when trying to align these concepts and traditions into western science. My personal approach is to use the “waka hourua” model to ensure these examples remain in their own domain or sphere when engaging in different knowledge bases that can be misconstrued such as mātauranga Māori and mātauranga pākehā. My personal preference is to use mātauranga Māori worldview and western science worldview¹⁶.



- 37) To give some context to this concept, a bachelor Parāoa stranded and passed away at te wahapū o Terenga Parāoa (the mouth of the Whangarei Harbour) on Mair Bank in May 2017. Terenga Parāoa culturally known as the meeting place of the Whales and the meeting place of the chiefs, provides an expression of both analogies and the connection between the harbour rangatira Parāoa and hapū iwi rangatira.

- 38) This was a tohu as it occurred during the Refining NZ capital dredging resource consent application process. Tohunga and rangatira discussed the tikanga of tohu from this event of which one was kotahitanga (together as one). This sad event was also a gift of insight of the tohu and using the tikanga practice of

¹⁶ Presentation delivered at the International Congress of Plant Pathology, available on request. <https://www.icpp2023.org/>

hauhake¹⁷ to give respect to the Parāoa to offer a new journey in the form of wānanga learning for those involved in the hauhake process, and having the opportunity to utilise the resources or taonga for tikanga under customary practices.



Hauhake process of the Sperm Whale named Tāhuhu Pōtiki

39) More recently, we received another pouri (sad) event of 6 Aihe (Dolphins) stranding and passing away during the process of this Northport resource consent application. As discussed in our taitamariki submission this was another significant event that provided tohu and wairua experiences as key components of tikanga and customary practices. Events like these will be referred to as coincidences however, spiritually and culturally these are signs or omens requiring attention during discussions like what we are doing here.

¹⁷ Flensing - slice the skin or fat from (a [carcass](#), especially that of a [whale](#)).



6 Aihe (common Dolphins) passed away at the Refinery Aug 2023

- 40) Patuharakeke have developed a strong relationship based on the Waka Hourua model of bringing Western Science and Mātauranga Māori knowledge together to get a better understanding of the cause of such events. A simple example of this is shifting the science system to having a serial number identifying the taonga Aihe to also applying the name given during the tangihanga process of the Aihe and recording that alongside their scientific records, articles, journals and communications acknowledging Patuharakeke's role in co-management of research and outputs for equitable outcomes from a scientific perspective and Māori cultural perspective.
- 41) Terenga Parāoa is a taonga in itself and all within. The harbour is a living body of water which is subject to neighbouring land based activities. The cumulative effects on the harbour as a whole has resulted in the degradation of the mauri of this taonga and all taonga within.
- 42) The further development and reclamation will result in a further loss of Terenga Parāoa waterbody space, volume and ecosystems. The additional build up of the passage of this part of the harbour (I will refer to as the "throat" of Terenga Parāoa) will be further constricted or "choked" forever. Our experts have raised concerns about the modelling and coastal processes that may help to investigate this concept further but at this present time I am concerned about this additional restriction on the mana and mauri of our rangatira taonga, Terenga Parāoa.

- 43) Biosecurity - One area that has had very little reference to is marine biosecurity. Biosecurity is a major issue across the world. Increased vessel traffic increases the biosecurity risk. There are policies and procedures in place however, recent incursion of *Caulerpa Brachypus* highlights the risks and response required to prevent these non-indigenous species (NIS) from taking over indigenous kainga. Fan Worm (*Sabella Spallanzanii*) is having a direct impact on Terenga Parāoa alongside many other NIS.
- 44) Patuharakeke Te Pou Taiao Unit are participating in a Marine Biosecurity Toolbox research programme upholding a Vision Mātauranga theme throughout other key research areas taking a waka hourua approach using the benefits of western science and mātauranga Māori knowledge.
- 45) A comprehensive prevention and immediate eradication plan (to avoid shifting to management of NIS) is a must.

STRATEGIC POU

- 46) The Patuharakeke (draft) Strategic Pou as discussed in the CEA was developed through a whānau led wānanga process. In everything we do as Māori our strategic pou are interconnected therefore whatever activities occur (positive or negative) in one pou will have benefits or disadvantages in other pou. In my view, everything starts from the Taiao. If our Taiao is prosperous then our people are prosperous.
- 47) Under the existing proposed application, due to the reasons outlined in our Patuharakeke expert evidence and submissions, there are more negative impacts than positive to our pou. The following are our pou (See Appendix 2 for more information about our strategic pou).
- a) Te Poupouwhenua – He Whakaputunga me Te Tiriti o Waitangi
 - b) Pou Kāwanatanga – Governance
 - c) Pou Taiao – Environmental
 - d) Pou Hauora – Whānau health
 - e) Pou Mātauranga – Educational
 - f) Pou Ahurea – Culture
 - g) PouTai Tamariki-tanga – Succession
 - h) Pou Whaioranga – Economic

CULTURAL EFFECTS

- 48) Every living and non-living thing has mauri. There is a wide range of academic literature on what mauri is, as well as mātauranga kōrero tuku iho passed down intergenerationally. This application is primarily about te Mana me te Mauri o Terenga Parāoa.
- 49) In the context of this consent application there are multiple taonga broadly referred to (but not limited to) in paragraph 19 above. My submission provides some context of the intrinsic relationship everything has from a te Ao Māori perspective in regard to our Ātua, our rangatira to our taonga both human and otherwise.
- 50) As co-convenor of our Patuharakeke Te Iwi Trust Board Pou Taiao Unit, I have had the privilege of being a part of this journey in support of our rangatira Ms Juliane Chetham, the other co-convenor of our unit. The expert evidence and submissions we have presented at the Takahiwai Marae highlights key issues that require more; robust discussion to provide better advice to the decision makers, more detailed data driven modelling, and further detailed discussions to provide clear comprehensive and informed advice based on a waka hourua approach.
- 51) There are multiple issues with the application from a cultural perspective that have been outlined in the CVA and CEA reports, and submissions we provided throughout the hearing process. I support our technical and cultural response to the application and would like to pull out a few significant issues to share my whakaaro on these.
- 52) There will be another impact on the throat of our harbour system as the development of the port infrastructure grows. Cumulative effects from the Port infrastructure alone continues to grow their occupation of our takutai and a significant part of Terenga Parāoa is lost forever. This continues to severe our connection of the takutai where the port infrastructure started from and where it proposes to continue to expand.
- 53) We have already lost our connection to the takutai where the port is and history shows, it will never be reversed even if the mitigation was unsuccessful. For example, a cockle reseedling program was a key part of the mitigation for the last application. It was unsuccessful. The concept was great just like the concepts being offered today however, mana whenua mana moana were not involved in the discussions or decision making.

- 54) Bird Roost - I recognise the approach from the applicant looking at the greater harbour system and sites for bird roosting. The applicant says it avoids the effects. Through the eyes of the manu, to lose their kainga is significant. To remove their kainga and assume they will move to a man-made reserve is similar to what has happened to indigenous peoples around the world including here in Aotearoa for the exact same purposes i.e. to take the land from tangata whenua for public purposes i.e. land taken under the public works act. Also, while the applicant believes this is a good option for mitigating the effects, the proposed location triggers further impacts on another even more at risk manu, the Lesser Knots. If you cannot avoid the destruction of the kainga of the manu, then I do not support the application.
- 55) Pocket Park – is an example of excluding mana whenua mana moana from the opportunity to be a part of a co-design process and be a part of the concept.
- 56) Kaitiaki Group (KG) - again, is an example of excluding mana whenua mana moana from the opportunity to be a part of a co-design process and be a part of developing the options.
- 57) Kaitiaki Fund (KF) - again, is an example of excluding mana whenua mana moana from the opportunity to be a part of a co-design process and be a part of developing the options.
- 58) Alternatives Analysis – again, is an example of excluding mana whenua mana moana from the opportunity to be a part of a co-design process and be a part of developing the options.
- 59) In regard to points 54 to 58 we have heard from the applicant how these were formulated (without mana whenua mana moana input) to attempt to address cultural concerns. I understand the applicant needs to propose something rather than nothing. I see they have identified many of the issues identified in our cultural evidence and submissions. However, there are fundamental issues;
- 60) We are accustomed to drafting stringent consent conditions some of which are captured at a high level in the mitigation package however, this relies on a comprehensive adaptive management plan.
- 61) There are fundamental cultural issues including the destruction and loss of rangatira taonga and their kainga that cannot be avoided.

- 62) The RMA process may not allow for mitigation options outside of the scope of this process that addresses our strategic pou that are negatively impacted.
- 63) Reclamation is irreversible, there is not enough certainty and therefore there is too much risk to agree to the application.
- 64) The mitigation package cannot outweigh the effects on our cultural values and taonga.
- 65) Biosecurity – not enough investigation – the applicant witnesses rely on Northland’s Marine Pathways Plan to mitigate the potential effects of the spread of marine pests yet this hasn’t been able to stop the recent cauleurpa invasion. EMR discussed this risk to the marine reserve in their presentation and this is just another stressor adding to the cumulative effects highlighted by Dr Bulmer.

RECOMMENDATIONS

- 66) I don’t believe there is enough information for the kōmihana to make an informed decision. Many experts have agreed further discussions are required to give more detail to some of the high level mitigation options offered.
- 67) The application must be declined due to;
 - 1) An adaptive management plan normally applies the opportunity to change activities based on findings that improve or don’t meet the expectations in consent conditions (for example new technology or information from monitoring) however, in this instance, the reclamation activity is irreversible.
 - 2) The effects on our cultural values outweigh the mitigation package offered without our input.
 - 3) The effects on our Rangatira/taonga species outlined in my submission outweigh the mitigation package.
 - 4) The economic analysis did not include a modern quadruple bottom or at least a cultural values component in the scope i.e. to address our strategic pou cultural values.
 - 5) Further discussions are required to address uncertainties so the komihana can make a fully informed decision based on robust data and information.