

# The Treasury

## Overseas Investment Act Forestry Review Information Release

June 2022

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## Treasury Report: Overseas Investment Act Forestry Review - Māori engagement

<b>Date:</b>	13 December 2021	<b>Report No:</b>	T2021/3029
		<b>File Number:</b>	IM-5-8-4

### Action sought

	Action sought	Deadline
<b>Minister of Finance</b> (Hon Grant Robertson)	<b>Note</b> the contents of this report.	None.
<b>Associate Minister of Finance</b> (Hon David Parker)	<p><b>Agree</b> to undertake Māori engagement prior to Cabinet considering the Overseas Investment Act Forestry Review policy proposals, as well as to amend the draft Cabinet paper to seek Cabinet's agreement to minor and technical legislative changes.</p> <p><b>Indicate</b> your proposed priority for the bill as part of the 2022 Legislation Programme.</p> <p><b>Refer</b> this report to the Minister for Māori Crown Relations: Te Arawhiti, Minister for Land Information, Minister of Forestry and Minister for Māori Development.</p>	14 December 2021

### Contact for telephone discussion (if required)

Name	Position	Telephone	1st Contact
Sarah Key	Senior Analyst, International	[39]	N/A (mob) ✓
Conor McBride	Acting Manager, International	[35]	

### Minister's Office actions (if required)

<p><b>Refer</b> this report to the Minister for Māori Crown Relations: Te Arawhiti, Minister for Land Information, Minister of Forestry and Minister for Māori Development.</p> <p><b>Return</b> the signed report to the Treasury.</p>
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Note any feedback on the quality of the report

**Enclosure:** N/A

# Treasury Report: Overseas Investment Act Forestry Review - Māori engagement

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## Executive Summary

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This report seeks your (the Associate Minister of Finance) agreement to undertake targeted engagement with Māori ahead of the Economic Development Committee's (DEV) consideration of the Overseas Investment Act Forestry Review policy proposals in February 2022.

The report also seeks your:

- agreement to amend the draft Cabinet paper to include minor and technical legislative changes to improve the operation and effectiveness of the 2018 forestry changes to the Overseas Investment Act (rather than these decisions being delegated to joint Ministers), and
- views on the priority of the proposed bill (to give effect to the legislative changes above) on the 2022 Legislation Programme.

### ***Māori engagement***

Given the delay in DEV's consideration of your proposals, officials recommend making use of the extra time to ensure Māori views are considered and reflected in the upcoming Cabinet paper.

Under the Treasury's preferred approach, officials would engage with targeted and representative groups of Māori forestry representatives over three hui held in a hybrid format (both online and in-person, subject to COVID-19 Protection Framework settings). These hui would potentially be held in the week beginning 17 January 2022. This would provide an opportunity for iwi/Māori to influence policy outcomes in this space, support Cabinet in making an informed decision on the policy proposals, as well as support the Crown in acting as a good Treaty partner.

This report seeks your agreement to lead one or all three of these hui, subject to your availability. This would demonstrate Crown willingness to engage with and hear from representatives in the sector. Should you choose not to (or not be available to) attend these hui (which will likely be in the form of a two-hour hybrid meeting), they would be led by a Treasury representative at Deputy Secretary or Director level.

This approach presents a risk of information leakage (as for other Crown engagement undertaken in a confidential sphere). However, the individuals and groups with whom we would look to engage would understand the sensitivity of this engagement, as well as the relational dynamics in the Māori-Crown space. Officials would seek to mitigate this risk by requesting that the Māori forestry representatives enter into confidentiality agreements with the Treasury on behalf of the Crown ahead of the hui (a similar approach to other Crown negotiations with iwi led by the Treasury).

## Recommended Action

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We recommend that you (the Associate Minister of Finance):

- a **agree** that officials conduct targeted engagement with Māori prior to Cabinet considering the upcoming Cabinet paper that will seek approval to remove forestry conversions from the Overseas Investment Act (the Act) special forestry test

*Agree/disagree*

- b **agree** that officials conduct engagement with Māori post the announcement (with a wider group of Māori with economic interests in forestry)

*Agree/disagree*

*Subject to your agreement to recommendation a)*

- c **agree** to lead the pre-Cabinet-decision engagement with Māori potentially in the week beginning 17 January 2022 (if you agree, we will engage with your office to see whether such engagement could be accommodated)

*Agree/disagree*

- d **note** that the draft Cabinet paper will be updated to reflect the outcome of this engagement

- e **agree** to amend the draft Cabinet paper to seek Cabinet's agreement to minor and technical legislative changes to improve the operation and effectiveness of the Act's forestry provisions

*Agree/disagree*

- f **note** that officials will provide advice in late January 2022 seeking your agreement to the recommended changes (subject to your agreement to recommendation e) as well as a revised Cabinet paper

- g **indicate** which of the following priority categories you intend to propose for the bill (to give effect to the legislative changes, subject to Cabinet approval) as part of the 2022 Legislation Programme:

Category	Agree/Disagree
Category 2: must be passed in the year	
Category 3: to be passed if possible in the year	
Category 4: to be referred to a select committee in the year	

h **refer** this report to the Minister for Māori Crown Relations: Te Arawhiti, Minister for Land Information, Minister of Forestry and Minister for Māori Development.

*Refer/not referred*

Conor McBride  
**Acting Manager, International**

Hon Grant Robertson  
**Minister of Finance**

Hon David Parker  
**Associate Minister of Finance**

# Treasury Report: Overseas Investment Act Forestry Review - Māori engagement

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## Purpose of Report

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1. The Economic Development Committee's (DEV) consideration of the draft Cabinet paper *Overseas Investment Act Forestry Review: Removing Forestry Conversions from the 'Special Forestry Test'* (the draft Cabinet paper) has been delayed to February 2022 (from 8 December 2021).<sup>1</sup>
2. Given this delay, this report seeks your (the Associate Minister of Finance):
  - a agreement to officials engaging with Māori ahead of Cabinet's consideration of the Cabinet paper as part of the Overseas Investment Act Forestry Review (Forestry Review) and, if progressed, seeks decisions from you on your level of involvement in hui, and
  - b agreement to amend the draft Cabinet paper to seek Cabinet's agreement to minor and technical legislative changes to improve the operation and effectiveness of the 2018 forestry changes to the Overseas Investment Act (the Act),<sup>2</sup> rather than this being delegated to joint Ministers.

## Background

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### *Forestry Review currently under way*

3. In March 2021, Cabinet agreed to conduct a tightly focused review (the Forestry Review) of the operation and effectiveness of the 2018 changes relating to how overseas investments in forestry are screened under the Act.

### *Ministers' decisions on removing forestry conversions from the special forestry test*

4. In October 2021, you, together with the Minister for Land Information and Minister of Forestry, agreed to remove forestry conversions from the special forestry test.<sup>3</sup> Instead of using the streamlined special forestry test pathway, Ministers agreed that forestry conversions would go through the revised Benefit to New Zealand test, rather than the new farmland benefit test (T2021/2512 refers).<sup>4</sup> Ministers indicated that they have a preference for action and that they prioritise timely legislative change.
5. You subsequently agreed to seek Cabinet approval to give effect to Ministers' decisions by rescoping the Forestry Review so that it is focused on legislative change to remove forestry conversions from the special forestry test and improve the operation and effectiveness of the Act's forestry provisions. You also agreed that, after the legislative process, officials would consider any further operational changes that may be required that are not resolved by the legislative changes (T2021/2764 refers).

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1 The paper is scheduled to be considered by DEV on either 9 or 16 February 2022.

2 In 2018, the Government changed how overseas investments in forestry are screened under the Act. The changes brought forestry cutting rights into the screening regime and established streamlined consent pathways for forestry investments (including the special forestry test).

3 The 'special test relating to forestry activities', commonly known as the 'special forestry test', assesses an investment against a "checklist" of requirements and does not involve a 'counterfactual' analysis. The test was introduced to facilitate more overseas investment in plantation forestry than would be facilitated under the existing benefits test. It aims to be more permissive, create more certainty for investors and streamline the processing of applications.

4 Both tests came into effect on 24 November 2021. The new farmland benefit test has a higher benefit threshold.

6. In November 2021, you reviewed the draft Cabinet paper and did not have any comments (T2021/2806 refers). This paper was then circulated for Ministerial consultation, before your office and the Prime Minister's Office agreed to delay consideration of the paper to February 2022. As currently drafted, this Cabinet paper seeks agreement to:
  - a remove forestry conversions from the special forestry test (and that forestry conversions instead go through the revised Benefit to New Zealand Test) and commence legislative change to give effect to this decision,
  - b amend the Forestry Review Terms of Reference (ToR) to include forestry conversions within scope of the Review, and
  - c make minor/technical changes to the Act to improve the operation and effectiveness of the forestry related provisions, consistent with the Forestry Review ToR.

## Opportunities for Māori engagement

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7. As previously advised, removing forestry conversions from the special forestry test presents risks for Māori – Crown relations because of the importance of forestry to Māori, economically and culturally (T2021/2806 refers). Furthermore, progressing legislative change, ahead of any comprehensive consultation, presents significant relationship risks for the Crown and risks for Māori, for whom these changes would disproportionately impact, due to Māori interest in the sector.

*The previously-agreed approach to Māori engagement did not include engagement pre-Cabinet decision-making...*

8. In November 2021, you agreed that the Treasury would conduct targeted engagement with Māori. The first engagement would be immediately following Cabinet's decision but prior to the announcement of policy changes (with a small but representative group of Māori forestry representatives). The second series of engagements would be post the announcement (with a wider group of Māori with economic interests in forestry) (T2021/2806 refers). You also agreed to lead the pre-announcement engagement with Māori.
9. At the time, officials had considered consulting with Māori ahead of Cabinet's decision, which would have better managed risks to Māori-Crown relations. However, this option was not progressed as it did not align with Ministers' preference for timely change. This is primarily because holding consultation prior to Cabinet's decision to agree to commence the legislative process would have slowed down the legislative process.

*... but the delay in Cabinet's consideration presents an opportunity to hear Māori views in advance of Cabinet's decision*

10. Given the delay in DEV's consideration of your proposals, officials recommend making use of the extra time to ensure Māori views are considered and reflected in the upcoming Cabinet paper.

11. Under the Treasury's preferred approach (see **Annex A** for further details), officials from the Treasury, supported by Toitū Te Whenua Land Information New Zealand and Te Uru Rākau – New Zealand Forestry Service / Ministry for Primary Industries, would engage with targeted and representative groups of Māori forestry representatives over three hui held in a hybrid format (both online and in-person, subject to COVID-19 Protection Framework settings). These hui would potentially begin in the week beginning 17 January 2022. This would provide an opportunity for iwi/Māori to influence policy outcomes in this space, support Cabinet in making an informed decision on the policy proposals, as well as support the Crown in acting as a good Treaty partner.
12. The targeted engagement would be focused on seeking Māori feedback on the proposal to remove forestry conversions from the special forestry test. In particular, officials would listen to the participants' views on the economic and cultural impact of the policy proposals.
13. In addition, officials would note that government would be proposing minor and technical legislative changes to improve the operation and effectiveness of the 2018 changes to the forestry-related provisions of the Act. This would not, however, be the key focus of the targeted engagement.
14. We are seeking your agreement to lead one or all three of these hui, subject to your availability. This would demonstrate Crown willingness to engage with and hear from representatives in the sector. Should you choose not to (or not be available to) attend these hui (which will likely be in the form of a two-hour hybrid meeting), the hui would be led by a Treasury representative at Deputy Secretary or Director level. We would also look to invite a key representative from both Toitū Te Whenua Land Information New Zealand and Te Uru Rākau – New Zealand Forestry Service / Ministry for Primary Industries but keep the number of attendees limited.
15. Following the hui, officials will consider the key messages or areas of concern heard through the engagement and provide advice to you on recommended next steps. Officials would then update the draft Cabinet paper to provide an overview of the outcomes of this hui, including the key messages or areas of concern among Māori, and any consequent proposed policy changes as a result of the engagement.
16. Officials would also engage with Māori post the public announcement of these changes (as currently planned), with a wider group of Māori with economic interests in forestry.

*This approach has risks, which can be mitigated.*

17. This approach presents a risk of information leakage (as for other Crown engagement undertaken in a confidential sphere). [1]

However, the individuals and groups with whom we would look to engage would understand the sensitivity of this engagement, as well as the relational dynamics in the Māori-Crown space. In addition, the experience from the 2018 round of Overseas Investment Act engagement shows that these stakeholders are responsible and can be trusted to respect the confidentiality of the matters discussed with them.

18. Officials would mitigate these risks by requesting that the Māori forestry representatives enter into confidentiality agreements with the Treasury on behalf of the Crown ahead of the hui (a similar approach to other Crown negotiations with iwi led by the Treasury). The Treasury would also prepare a brief communications plan, including 'reactive' messaging that could be drawn from should this information prematurely reach the public domain.

19. As previously advised, we are also cognisant of the wider interface of Māori-Crown relations, including the saturation of consultation with the Crown, in addition to tension points across various Government policy areas [T2021/2806 refers]. The Emissions Reduction Plan, currently being consulted on, also canvasses changes that would, if progressed, materially and disproportionately impact Maori forestry interests. We will consider opportunities to take a more coordinated approach to engagement with Maori on forestry regulatory settings in order to reduce consultation saturation.
20. Officials have considered a more comprehensive consultation with:
- a a broader group of Māori
  - b the forestry industry, and
  - c the rural / farming community.
21. In particular, consulting with the forestry industry and the rural / farming community would present an opportunity to hear about the impact of the proposals on these sectors ahead of Cabinet's consideration of the proposals. Further, broader consultation would better manage government reputational risks and would support government in managing its relationship with these sectors.<sup>5</sup> [1]
22. In the absence of time constraints, broader consultation would be Treasury's preferred approach, however, this would not align with Ministers' preference for timely change as it would not be feasible to conduct comprehensive consultation in the timeframe available. Additionally, there are risks of information leakage with more broad consultation.
23. The timing of the proposed Māori engagement (in mid-late January, after the Christmas/summer break) presents availability constraints, however, any delay would impact government capacity to consider this feedback and reflect it, as appropriate, in the upcoming Cabinet paper. To manage these availability constraints, officials would approach key representatives in advance, to test availability, with a view that appropriate alternatives can be arranged. This would ensure an appropriate level of mana, geographic representation and Māori economic interests<sup>7</sup> are represented at this engagement.

[36]

24. [36]

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<sup>5</sup> As previously advised, one of the drivers of the introduction of the streamlined test three years ago was a quid pro quo with the forestry investment industry for bringing forestry rights into the screening regime (T2021/2512). While the inclusion of forestry conversions in the streamlined test was not a specific part of that discussion, the forestry industry would still see forestry conversions within that context.

[1]

<sup>6</sup> Beyond reporting on the frequency with which those applications use the consent pathway.

<sup>7</sup> For example, Māori with an existing, significant stake in the forestry sector and Māori who are own under-utilised or poorly performing, non-forestry Māori land.

25. [36]

26.

27.

***Ministry for Primary Industries comment***

28. Officials at Ministry for Primary Industries (MPI), including Te Uru Rākau-New Zealand Forest Service, support the proposal put forward in this paper of taking steps to ensure Māori views are considered and reflected in the upcoming Cabinet paper. They recommend efforts be taken to ensure that there is broad representation of Māori interests as part of this engagement process, noting the multidimensional nature of Māori interests in the forestry sector and geographical spread of iwi. They also recommend a short and light touch consultation with wider industry alongside engagement with Māori to help manage risks around information leakage and sector relationships.

29. [1]

30.

31.

32.

33. MPI officials consider that not following a good process that includes transparency and consultation with the forestry industry about the proposed change carries a high risk of damaging Government's relationship with a major sector of the New Zealand economy and major employers in rural communities. MPI knows of several participants in the forestry sector that could be impacted in relation to planned forestry-related investments in the range of [25] including planned investments that these companies have discussed with Ministers and government officials.
34. One option put forward by MPI officials for mitigating the process risk they've raised would be taking a more transparent approach as to the proposed changes and planning a period for industry consultation (e.g. allowing a two week period for submissions) into the process in the new year. For example, this could be done while engaging more widely on Māori interests.

### Minor / technical legislative changes to forestry-related provisions of the Act

35. There were a number of minor and technical issues raised through the first tranche of engagement on the operation and effectiveness of the 2018 forestry changes to the Act. Some of these issues would be best addressed through the legislative vehicle to remove forestry conversions from the special forestry test.
36. The current draft Cabinet paper seeks delegated authority for you, the Minister of Finance, Minister for Land information, and Minister of Forestry (joint Ministers) to take further policy decisions on minor and technical legislative changes, consistent with the Forestry Review Terms of Reference and the direction of the Cabinet paper.
37. The delay in Cabinet consideration of the policy proposals now provides an opportunity for officials to progress this policy development ahead of Cabinet decision-making. Officials therefore seek your agreement to amend the Cabinet paper to seek Cabinet's agreement to minor and technical legislative changes (rather than delegate these decisions to joint Ministers). We will provide advice in late January 2022 seeking your agreement to the recommended changes, as well as a revised Cabinet paper.

### Priority of proposed bill on Legislation Programme

38. The Cabinet Office has recently released its circular on the *2022 Legislation Programme: Requirements for Submitting Bids* (CO(21)1). Treasury officials are preparing a bid for your submission to the Cabinet Office (due 28 January 2022). To support the development of this bid, we recommend you indicate which of the following priority categories you intend to propose for the bill to give effect to these policy proposals (subject to Cabinet decision):<sup>8</sup>
  - a Category 2: must be passed in the year
  - b Category 3: to be passed if possible in the year
  - c Category 4: to be referred to a select committee in the year (*this option would not meet Ministers' preference for timely legislative change and, depending on timing of referral and length of select committee process, may not be enacted before mid-2023*).

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<sup>8</sup> The other priority categories are as follows: Category 1: must be passed or introduced in the year as a matter of law; Category 5: instructions to be provided to PCO in the year; Category 6: on hold; Category 7: not to proceed.

## Next steps

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39. Subject to your agreement to the recommendations above, officials will work to the following timeline:

Activity	Due date
Treasury advice to support your engagement with Māori	Week beginning 10 January 2022
Hui with targeted and representative groups of Māori forestry representatives	Week beginning 17 January 2022 (indicative)
Treasury advice, revised draft Cabinet paper and draft regulatory impact statement. Treasury advice will cover: <ul style="list-style-type: none"> <li>the outcome of the Māori engagement</li> <li>minor / technical legislative changes to be included in the draft Cabinet paper</li> <li>updated talking points.</li> </ul>	Late January 2022 (indicative)
Ministerial consultation on revised draft DEV paper	Late January / early February 2022 (indicative)
DEV paper to be lodged	3 or 10 February 2022 (TBC)
DEV Meeting	9 or 16 February 2022 (TBC)
Cabinet Meeting	14 or 21 February 2022 (TBC)
Announcement	Mid-late February 2022 ( <i>indicative only</i> )
Post-announcement engagement with Māori	Mid-late February 2022 ( <i>TBC – subject to date of announcement</i> )
Officials to initiate work for legislative change and prepare an Overseas Investment Act Amendment Bill for Cabinet consideration in 2022 ( <i>subject to Cabinet agreement and your views on the priority of the bill on the Legislation Programme</i> )	Ongoing

## Annex A: Overview of proposed Māori engagement

1. Subject to your (the Associate Minister of Finance) agreement, officials from the Treasury, supported by Toitū Te Whenua Land Information New Zealand and Te Uru Rākau – New Zealand Forestry Service / Ministry for Primary Industries, would engage with targeted and representative groups of Māori forestry representatives over hui potentially in the week beginning 17 January 2022.
2. We are proposing to hold three hui with representatives from three different geographic locations where there are the largest concentrations of Maori forestry ventures. The hui would be held in a hybrid format (i.e. both online and in-person), subject to COVID-19 Protection Framework settings.
3. We would look to engage with members of the previously-concluded Forestry Iwi Reference group<sup>9</sup> (which you had established and with whom we have built up relationships), iwi that are key users of the regime (with their overseas partners) and whom we reached out to as part of the targeted tranche of engagement for the Forestry Review,<sup>10</sup> and representative Māori land owning groups. These groups include ahu whenua trusts and Māori incorporations and representatives of the owners of undeveloped Māori freehold land that do not yet have a trust or incorporation.
4. The table below provides the proposed list of individuals / groups to engage with and is indicative only, depending on availability in January 2022.

### Proposed individuals / groups to engage with potentially in the week beginning 17 January 2022

Proposed individual / group	Location	Previous interaction
<b>Northland hui (location TBC)</b>		
<b>Te Rarawa</b>	Iwi, Kaitaia based	Officials reached out for a meeting as part of targeted engagement on the Forestry Review.
<b>Ngāti Tamaterā</b>	Iwi, Coromandel based	As above
<b>Ngā Maunga Whakahii o Kaipara Development Trust</b>	Iwi, Auckland	As above
[23]	Whangarei	Member of the previously-concluded Forestry Iwi Reference Group (FRG)
	Auckland – Taupo iwi (Ngāti Tūwharetoa)	Member of the FRG
	Moerewa and Kawakawa	
<b>Central-north hui (Hamilton or Rotorua)</b>		
<b>Maungaharuru Tangitu</b>	Iwi, Napier based	Officials met with iwi as part of targeted engagement on the Forestry Review.

9 In 2018, the Government established an Iwi Forestry Reference group to allow for continued dialogue with iwi and the Māori forestry sector on the impact of forestry related changes. The fourth and final meeting took place in February 2021 (T2020/3315 refers).

10 Officials reached out to four iwi to engage with as part of the first tranche of the Forestry Review (targeted stakeholder engagement). These iwi, based in different regions of the North Island, were selected on the basis that they had the most extensive dealings with different aspects of the special forestry test.

<b>Proposed individual / group</b>	<b>Location</b>	<b>Previous interaction</b>
[23] Tuwharetoa Maori Trust Board	Trust Board that administers assets for Ngāti Tūwharetoa, Lake Taupo	
[23]	Tribal affiliations to Te Arawa (Rotorua and Bay of Plenty), Tainui (Central North Island) and Ngati Porou (East Cape and Gisborne)	Member of the FRG
	Ngati Porou (East Coast) and Te Arawa (Bay of Plenty) descent.	
[23] Tūwharetoa Māori Trust Board [23] of the Lake Taupō Forest Trust and Lake Rotoaira Forest Trust	Taupō	Member of the FRG
[23] Ngati Porou Forests Limited	Ruatōria	Member of the FRG
[23] Raukawa ki te Tonga AHC Limited (from Ngāti Raukawa, Ngāti Tūwharetoa, Ngāti Hauiti, Ngāti Rangī, Ngāti Apa).	Central North Island	Member of the FRG
[23] Interpine Innovation	Rotorua	
<b>Wellington or Nelson hui</b>		
<b>Federation of Māori Authorities</b>	Wellington-based office	
[23] Ngāti Rārua, [23] Mātauranga Iwi Leaders Group. Hapu of Ngāti Paretona, Ngāti Pareteata, Te Arawaere and Tūrangapeke.	Nelson	Member of the FRG
[23] Ngāi Tahu, Queen Elizabeth II National Trust director	Nelson/ Marlborough/Kaikoura	Member of the FRG
[23] Walking Access [23] Commission	Wellington	
[23] Ngāi Tahu Farming, [23] Stevenson Group Limited	Canterbury	
[23] , Wakatū Incorporation		