

# Submission

**To:** Justice Committee  
Parliament Buildings  
Wellington

**By:** Northland Regional Council

**On:** Local Government (Electoral Legislation and Māori Wards and Māori Constituencies)  
Amendment Bill No. 46—1

## INTRODUCTION AND BACKGROUND

- 1.1. Northland Regional Council (NRC) thanks the Justice Committee for the opportunity to submit on the proposed Local Government (Electoral Legislation and Māori Wards and Māori Constituencies) Amendment Bill (“the Bill”). NRC’s submission is made in the interest of promoting the sustainable management of Northland’s natural and physical resources, the wellbeing of all its people and communities, and delivering on its obligations under legislation.
- 1.2. In October 2020, NRC voted to establish Māori constituencies for the 2022 and 2025 regional council elections. This resulted in the establishment of a Māori constituency (Te Raki Māori) with two councillor representatives for the 2022 regional council elections. This decision was informed by public consultation during a representation review in 2021, and these arrangements were made in accordance with the provisions of the Local Electoral Act 2001 (LEA).
- 1.3. The establishment of Māori wards and constituencies is entirely appropriate and necessary for Northland, given the significant Māori population (around 35% of the region’s population — and around 50% of the Far North District — identifies as Māori). For NRC, it also addresses the issue that in the three terms (nine years) prior to the 2022 local body elections, there was no Māori representation on council — a serious gap in local democracy.
- 1.4. **Note:** for brevity in the rest of this submission, we mostly use the shorthand term “Māori wards”, to refer to both Māori wards and Māori constituencies.

## 2. SUMMARY OF COUNCIL POSITION

2.1. **We are extremely concerned that the submission timeframe will not enable many affected and interested parties who wish to submit on the Bill to prepare their submission.** We hope that the Government will engage in wider consultation on this matter, and **strongly urge the government to extend the submission period to at least one month.**

2.2. **Council strongly opposes the changes proposed by this Bill to Māori wards and constituencies provisions** in the Local Electoral Act 2001 (LEA), the Local Government Electoral Legislation Act 2023, and the Local Electoral Regulations 2001. Council's reasons for opposing the Bill are summarised below:

- a) Māori constituencies are an appropriate and necessary way to deliver on Te Tiriti o Waitangi obligations — they are not a race-based selection.
- b) The binding poll requirements ignore the 2010 Waitangi Tribunal finding that the Crown must ensure that its Te Tiriti obligations are upheld (even when it delegates functions to local government), including the equitable rights of Māori with other citizens when participating in democratic electoral processes.
- c) Reversion to a poll system will make it more difficult for councils to meet legislative requirements to facilitate Māori participation and representation, and will likely result in reduced Māori roles in decision-making functions in councils.
- d) Binding polls unfairly give to majority groups in the population the right to make decisions on a matter affecting the rights of a Māori minority (in most districts/regions). This is further exacerbated by a typically lower Māori voter turnout proportionally.
- e) Reversion to a poll system to establish / retain Māori constituencies in local government is inconsistent with the national electoral system of a Māori roll and Māori seats in Parliament. We see no rational reason for the different approach.
- f) The reintroduction of a binding poll system will impose a higher procedural standard for Māori wards and constituencies than is required for general wards and constituencies, which is contrary to natural justice and democratic principles.
- g) Reversion to a poll system is likely to mean council decision-making on issues of importance to Māori will be negatively affected, the ability of Māori voices to be heard will be diminished, and important established relationships will be undermined.
- h) Decisions on representation and relationships should be made via a deliberative, balanced and considered dialogue — not through a binary choice offered by a poll that could divide communities and damage race relations, and fail to protect Māori rights to equitable representation.

- i) The poll process is expensive, particularly if standalone. Estimated cost for a standalone Northland poll in 2025 would be \$420,000 + GST, while a poll conducted in conjunction with the 2025 local elections would likely cost between \$14,000 and \$28,000 + GST. This represents yet another cost to ratepayers associated with a decision made by central Government.

2.3. **In summary, status quo arrangements under the LEA are appropriate and workable, and it is unclear what procedural “problems” the proposed amendments are trying to correct.**

We disagree with the government definition of the “policy problem” *as restoring the right of the public to make decisions about Māori wards and constituencies* [through polls of electors]. The public has opportunities to express their views under the current system via representation reviews and voting in local government elections. The changes — if progressed — will do real harm to the relationships between the Crown, local government and Māori, and make it more difficult for councils to provide for Māori participation and representation. They will also add procedural complexity and cost for no gain.

2.4. **We understand the coalition government has a focus on cutting “red-tape and improving regulatory quality”** and has established the Ministry of Regulation for this purpose. As we understand it, a core role of this Ministry is to evaluate regulations against the problem definition and ensure that robust cost-benefit analysis is applied. In our view, the proposed changes to the LEA would not survive scrutiny by this new Ministry, given the lack of a clear problem statement, the added procedural complexity and costs, and the negative impact on local democracy. **We urge the government to release a Regulatory Impact Statement that sets out the problem and identifies the likely total costs to local government if the Bill progresses.**

**Relief sought:**

- **Do not proceed with the proposals in the Bill reinstating binding polls on Māori wards and constituencies — retain the status quo.**
- **Do not require councils to decide on whether to have Māori wards and constituencies prior to the representation review.**

2.5. **Our rationale for opposing the Bill** is described in more detail below.

## SUBMISSION

### 3. SUBMISSION TIMEFRAMES

- 3.1. **Northland Regional Council is very concerned about the extremely short period allowed for submissions** to the select committee on the Bill and urge Government to extend the timeframe. We do not accept that this truncated timeline must be followed to allow the changes to take place for the 2025 local elections, or even that the changes must take place for the 2025 elections. **Good decisions take time, and there is no need to rush this very important decision that is of a constitutional nature.**
- 3.2. **We urge the government to extend the timeframe for submission to the Select Committee to at least one month.**

### 4. THE CASE FOR THE STATUS QUO

- 4.1. In October 2020, Northland Regional Council resolved to establish Māori constituencies for the 2022 and 2025 regional council elections. This process included a series of six workshops in 2020, engagement with Te Kahu o Taonui (a collective of Taitokerau Iwi Chairs and CEOs) and Te Taitokerau Māori and Council Working Party (an advisory working party of NRC), and public consultation through a representation review in 2021. **Council is therefore confident that we went through a thorough and robust process in reaching an informed decision to establish a Māori constituency** (two Māori seats in one constituency: Te Raki Māori).
- 4.2. The reasons for establishing the NRC Māori constituency included:
- Advice that the council's relationship with Māori had hitherto been focused on providing for Māori participation rather than representation, and that Māori representation was needed to take council's relationship with Māori to the next level; and that Māori representation on council is a Te Tiriti right and an obligation for council.<sup>1</sup>
  - Māori constituencies are appropriate and necessary to recognise Northland's significant Māori population (around 35% of the region's population — and around 50% of the Far North District — identifies as Māori). Māori representation in council governance is an important expression of council's commitment to tangata whenua, to ensure that council is reflective of the communities it serves.
  - Māori constituencies strengthen the existing Māori – council partnership, and support and enable council to better reflect Māori values, issues, priorities and aspirations in relation to council roles and functions. This ultimately improves the

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<sup>1</sup> Advice provided to NRC by Te Kahu o Taonui (a collective of Taitokerau Iwi Chairs and CEOs) and Te Taitokerau Māori and Council Working Party (an advisory working party of NRC).

economic, social, cultural and environmental wellbeing of all of Te Taitokerau Northland, for all Northlanders.

- Māori constituency councillors bring Māori perspectives, values and issues of importance to the council table that those who are not tangata whenua cannot provide. This helps ensure that these aspects are more fully appreciated and considered in council decision-making on matters that affect a significant proportion of the Northland population. This strengthens local democracy.
- Having Māori constituencies sends a strong signal that NRC is listening to Taitokerau iwi and hapū, is open and willing to progress partnership and enduring relationships with our Te Tiriti Partners, and is committed to fair representation and equity in Northland.
- Māori representation on council had historically been low. For example, prior to the 2022 local body elections, NRC had not had any Māori representation for three consecutive council terms (9 years).

**Note:** the above reasons remain just as relevant today.

4.3. **The shortfall in Māori representation on councils has been recognised across New Zealand, with numerous councils establishing Māori constituencies.** This has been especially evident since the 2021 amendment to the LEA reduced barriers to establishing Māori constituencies. Prior to the 2021 amendment, only two councils in the country had established Māori constituencies (seven council decisions to establish wards or constituencies were overturned by polls); whereas since the LEA amendment, some 45 of the 78 councils in New Zealand have established Māori constituencies or have resolved to do so. Shortfalls in Māori representation on councils remain in places, but the **increased Māori representation enabled by the 2021 LEA amendment has in our view been a positive and essential development that has enhanced democracy and equity.**

4.4. Northland Regional Council has encapsulated its Te Tiriti commitments in the *Tāiki ē Te Tiriti Strategic Intent Te Tiriti Strategy and Implementation Plan*, adopted by both council and the Te Taitokerau Māori and Council Working Party. A goal of Tāiki ē is that “[t]āngata whenua are equitably represented in all council decisions and operations”, and one action is “the successful ongoing implementation of Māori constituencies”. If the Bill were to be passed by Government and then council faced the prospect or reality of not having any Māori ward councillors at the table, **NRC would need to put in place enhanced committee structures or Māori expert advisory resources to support our decision-making and implement our Te Tiriti commitments. This would entail significant additional costs, and could impact on council rates.**

- 4.5. It is notable that **52 out of 78 mayors and chairs** (66% of local authorities, including NRC), and LGNZ's Te Maruata Māori advisory group, **signed a letter to Government opposing the proposed changes** to Māori wards and constituencies (dated 22 May 2024).
- 4.6. It is clear to us that local communities and councils have recognised the need for better Māori representation in local government. This is evidenced by the fact that the majority of councils established Māori constituencies, or resolved to do so, following the 2021 LEA amendments that removed barriers to the creation of Māori constituencies. **The proposed Bill seeks to reinstate these regulatory hurdles, which would likely result in under-representation by Māori on councils and would be a major backward step, in terms of local decision-making and council delivering on obligations to Māori.**
- 4.7. **Government has placed obligations on local government that are difficult to meaningfully deliver on without Māori representation at the decision-making table.** These obligations are embedded in relevant laws applied to councils such as the Local Government Act 2002 (LGA), and are best achieved through Māori representation in council decision-making. For example, **section 14(d) LGA** sets out the principle that local authorities should provide Māori with opportunities to contribute to decision-making processes. This principle is reinforced in **section 82**, which requires all local authorities to have processes in place for consulting with Māori. **Section 77(1)(c)** requires local authorities, when making a significant decision with respect to land and bodies of water, to *take into account the relationship of Māori and their culture and traditions with their ancestral land, water, sites, wāhi tapu, valued flora and fauna and other taonga*. **Section 81** also requires local authorities to: (a) *establish and maintain processes to provide opportunities for Māori to contribute to the decision-making processes of the local authority*; and (b) *consider ways in which it may foster the development of Māori capacity to contribute to the decision-making processes of the local authority*.
- 4.8. **Waitangi Tribunal comments on local government arrangements are likely to have been considered by councils when deciding to establish Māori constituencies.** In 2010, the Waitangi Tribunal heard, through its inquiry into claims brought by tangata whenua in Tauranga Moana, that “the current composition of local bodies does not adequately reflect or represent Māori interests [and] the Crown needs to intervene to ensure that Māori are represented on councils.” The Tribunal’s report found that the Crown must ensure that its Te Tiriti obligations are upheld, even when it delegates functions to local government, and that this includes the equal rights of Māori to those of other citizens when participating in democratic electoral processes afforded by **Article 3 of Te Tiriti**. Article 3 commits the Crown to ensuring that the rights and obligation of a New Zealand citizen apply equally to Māori. While not signatories to Te Tiriti, local authorities make decisions that impact on the Crown’s obligations to Māori as tangata whenua and that impact on lands, waters and taonga important to Māori. While other formal or informal arrangements (such as Boards or

advisory bodies) are valuable and have their place, **the Waitangi Tribunal has observed that “[a]lternative mechanisms for Māori participation in local government are not the same as having a dedicated seat at the council table”.**

- 4.9. In 2010, the Human Rights Commission stated that unless positive steps are taken to improve Māori electoral representation in local government, the Māori voice “will continue to languish well below the proportion of Māori in the population”<sup>2</sup>.
- 4.10. **On 17 May 2024, the Waitangi Tribunal released its urgent inquiry report *The Māori Wards and Constituencies Urgent Inquiry Report on the Government’s proposed repeal of amendments made to the Local Electoral Act 2001 by the Local Electoral (Māori Wards and Māori Constituencies) Amendment Act 2021*. Key findings included:**
- a) The Tribunal found that **the Crown has breached the Treaty principle of partnership** by prioritising coalition agreement commitments and completely failing to consult with its Treaty partner or any other stakeholders. **The Crown has failed to adequately inform itself of its Treaty obligations, and has failed to conduct adequate Treaty analysis during the policy development process, in breach of its duties to act reasonably and in good faith.** It has inadequately defined the policy problem as restoring the right of the public to make decisions about Māori wards and constituencies [through polls of electors], when **no other type of ward or constituency requires a poll, in breach of the principle of equity.**
  - b) The Tribunal also found that **the Crown has failed to actively protect Māori rights and interests** by ignoring the desires and actions of Māori for dedicated local representation, and it found **breaches of the principles of mutual benefit and options.** Combined, these Treaty breaches operate to cause significant prejudice to Māori.
  - c) **The Tribunal recommended that the Crown stop the amendment process to allow proper consultation between the Treaty partners** with a view to agreeing how Māori can exercise their tino rangatiratanga to determine dedicated representation at the local level. The Tribunal drew the Government’s attention to the **existing provisions in the Local Electoral Act 2001 for representation reviews** that would better enable councils to seek public views on all wards and constituencies at the same time, including Māori wards or constituencies.
- 4.11. **Requiring binding polls on whether to have Māori constituencies makes it extremely challenging to deliver on obligations to Māori** (especially Te Tiriti obligations conferred on councils by central government) and to realise the benefits that Māori representation provides. It will also make it virtually impossible to remedy the situations highlighted by the Waitangi Tribunal and Human Rights Commission.

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<sup>2</sup> *Māori representation in local government*. Human Rights Commission, 1 Oct 2010. <https://tikatangata.org.nz/our-work/maori-representation-in-local-government>

## 5. GOVERNMENT OVERREACH

- 5.1. **The changes proposed to the LEA will undermine the ability of Aotearoa NZ communities and democratically elected councils to make their own decisions on Māori representation.** We strongly prefer the status quo, which provides a supportive legislative framework for local decision-making on Māori wards and constituencies.
- 5.2. There is no clear case for government intervention of this nature. **We disagree with the government definition of the policy problem** as *restoring the right of the public to make decisions about Māori wards and constituencies* [through polls of electors]. The public can have a say under the current regime through representation reviews and voting in local government elections.
- 5.3. **NRC considers that the Bill’s drafting is unbalanced and is designed to reduce the ability of councils to establish and retain Māori wards** (as polls of electors are more likely to reject Māori wards than approve them). **This does not provide equity or a level playing field** that enables councils to decide whether to establish or disestablish Māori wards with a similar level of ease. We consider this to be unjust and undemocratic.
- 5.4. **Decisions on representation and relationships should be made via deliberative, balanced and considered dialogue — not through a binary “yes/no” choice offered by a poll.** Polls can be a cause of community division and animosity, which disproportionately affect Māori, and race relations. This decision should be left to elected councillors to make, based on a deliberative and consultative process that gives adequate weight to Te Tiriti o Waitangi responsibilities.
- 5.5. **Councils, as democratically elected local government bodies, must be enabled to make their own decisions on whether to have Māori wards,** and the legislative system should enable this as effectively and efficiently as possible. Such decision-making will necessarily involve informed consideration of the needs and preferences of the community, especially whānau, hapū and iwi.
- 5.6. **NRC attaches great importance to the inclusion within the regular six-yearly representation reviews of consultation with Māori and other communities,** to feed into council deliberations on whether representation arrangements should include specific Māori representation (through Māori wards). This allows for the public to be consulted on a regular basis, and for that consultation to inform council’s resolution. Moreover, NRC considers this process appropriate and sufficient public consultation (in combination with any other consultation it might consider necessary), **and does not consider that there is a need for a poll of electors to provide a binding mandate for such a decision.**
- 5.7. **Our council is confident that we properly engaged with our communities when we decided in 2020 to establish a Māori constituency** with two Māori seats in Northland, and that — if allowed the opportunity by central government — we will be able to maintain an open



dialogue with our communities and tāngata whenua to ensure that the Māori constituency works well for our region.

- 5.8. The requirement of this Bill for a binding poll on whether to have the Māori constituency will likely **create unnecessary racial division in our community, and will not protect Māori rights to equitable representation** or benefit the development of Māori communities and the region as a whole.
- 5.9. We believe that guaranteeing Māori representation on council is in the **best interests not only of Māori but also of our region** — this should not be hindered by unneeded central government overreach into local democratic decision-making.

## 6. NATURAL JUSTICE

- 6.1. In our view **the current Bill abrogates the Crown’s Treaty obligations by significantly impeding the ability of councils to provide opportunities for Māori to contribute to local decision-making processes** (as required by the LGA) via an important mechanism, i.e. representation on council itself through the establishment and ongoing retention of Māori wards.
- 6.2. **The Bill unfairly applies a process for providing for Māori representation in local government via Māori wards that is very different to that applied for Māori representation in Parliament via Māori seats.** For national elections, there is no requirement for a poll of electors or a referendum to mandate Māori seats as a separate matter. In order to change the electoral system, the public may petition for a referendum, but even if one is held, it is not necessarily binding on Government. In contrast, this Bill singles out the decision to have or not to have Māori wards as a matter requiring a local poll of electors. The outcome of this poll is binding on councils if it achieves a simple majority. **Moreover, given the limited voter turnouts that occur at a local level, there is a serious risk that councils would be required to comply with the will of a minority of electors. There does not seem to be any plausible justification for this discrepancy** between the process for having Māori electorate seats mandated for parliamentary elections<sup>3</sup> and the process for having Māori wards mandated for local body elections.
- 6.3. **If the changes proposed in the Bill are adopted into law, Māori will have very different levels of agency under parliamentary elections and local body elections, in terms of choosing Māori representation arrangements.**  
For parliamentary elections, Māori have the right to enrol on the Māori electoral roll or on the general roll, which determines the number of Māori electorate seats. This gives Māori the ability to choose how they wish to be represented. There is no requirement for a poll of electors to allow this.

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<sup>3</sup> Under the Electoral Act 1993, Māori electorate seats exist in perpetuity unless the Act is amended.

In our view, Māori voters in local government elections should have similar opportunities to choose how they wish to be represented, by enrolling on the local Māori electoral roll or the general electoral roll, and being able to elect Māori representatives to council through Māori wards. **This should not be restricted by requiring binding polls.**

- 6.4. **The reintroduction of a binding poll system for Māori wards re-imposes a higher procedural standard for Māori wards than is required for general wards.** This is contrary to natural justice and democratic principles. The Bill proposes to restore provisions providing for 5% of electors to petition for a poll on whether to have Māori wards (or not). There is no such poll trigger for other decisions around wards (e.g. for general or rural wards). The only other representation decision that may be overturned by poll is the decision on the voting system.
- 6.5. **Binding polls on whether to have Māori wards unfairly give to majority groups in the population the right to make decisions on a matter affecting the rights of a Māori minority** (in most districts/regions). This is further exacerbated by a typically lower proportion of Māori voter turnout, for a complex range of reasons. **The existence or non-existence of Māori wards should not be dependent on a poll decision by people who are mainly non-Māori and generally have less understanding of issues that affect Māori and are of importance to them.**

## 7. IMPLICATIONS

- 7.1. **The effect of the proposed Bill will be to make it easier to disestablish Māori wards or to rescind council decisions to establish Māori wards than it is to establish them.** This is due to the requirement to put the issue of Māori ward establishment to a poll of electors at the 2025 local body elections if councils do not disestablish wards or rescind decisions to establish them, while a poll of electors is not required if councils decide to disestablish or rescind by 6 September 2024.
- 7.2. **Reversion to a polling system will likely result in reduced Māori roles in decision-making functions in councils. The outcomes will be that council decision-making on issues of importance to Māori will be negatively impacted, the ability of Māori voices to be heard will be diminished, and important established relationships will be undermined.** Judging by the previous experience of councils when binding polls of electors were required to establish Māori wards, if this Bill reinstates the poll system, the proportion of Māori councillors elected in most local governments will be significantly reduced. In many council elections, Māori electors may not get any representation by Māori councillors at all. For such councils without Māori elected members, Māori roles will just be limited to participation, engagement, and consultation through other mechanisms (if they exist), with few or no decision-making opportunities.

7.3. **Polls can be a cause of community division and animosity**, which disproportionately affect Māori, and race relations. In 2023 the Department of Internal Affairs commented that:

***Referendums and polls are an instrument of majority rule which can suppress minority interests.** Normal lawmaking process have safeguards to make sure minority rights and interests are considered – human rights legislation, parliamentary debates and the select committee process. But referendums do not require that tabling and balancing of interests, and **the outcome will depend on the majority’s perception of the minority interests.***<sup>4</sup> (emphasis added)

7.4. Former LGNZ President Dave Cull has also observed:

*... [P]olls reduce a complex issue to a simple binary choice, which, by encouraging people to take sides, damages race relations in our districts. Matters of representation and relationships should be addressed in a deliberative manner that employs balanced and considered dialogue – not by poll. In fact, a poll is not necessary. Should a council resolve to establish Māori wards or constituencies, or any other ward, against the wishes of its community then **the community has the option to hold that council to account at the next election** – this is how representative democracy is intended to work.*<sup>5</sup> (emphasis added)

7.5. **We agree with these insights. We agree that complex constitutional, legal and political issues do not get effectively resolved by a “yes/no” question.** The restoration of polls to determine decisions on Māori wards, including wards that have already been established, will lead to ill-considered outcomes. We also consider that this **risks real damage to relationships between Māori, communities and councils** and is likely to result in unconstructive debate and dissent.

7.6. **NRC opposes the Bill’s planned repeal, in clauses 19 to 28, of provisions of the Local Government Electoral Legislation Act 2023 that would amend the Local Electoral Act 2001 on 12 October 2025 were they to come into force on that date.** NRC opposes the Bill’s proposal to require councils to decide on whether to have Māori wards prior to the representation review, as it would mean that the extensive consultation with Māori and communities required by a representation review would not be able to inform their decision-making.

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<sup>4</sup> Department of Internal Affairs (2023), Local Government Briefing – Coalition policies for local electoral changes, p. 7.

<sup>5</sup> Local Government New Zealand (2018), open letter to the (then) Prime Minister, Deputy Prime Minister and Co-leaders of the Green Party.

## 8. COSTS

- 8.1. **There is significant expense involved in conducting polls (even if held in conjunction with local body elections), and representation reviews.** These are additional unexpected costs that should not have to be borne by councils. For Northland Regional Council, the estimated cost for a poll conducted in conjunction with the 2025 local elections is between \$14,000 and \$28,000 + GST. The estimated cost for a standalone Northland poll is \$420,000 + GST in 2025,<sup>6</sup> and it would likely cost more in future years should a petition to conduct a poll require a standalone poll prior to a triennial local body election.
- 8.2. For councils that opt to disestablish Māori wards for the 2025 local body elections, the proposed Bill requires them to conduct a **shortened representation review** if they cannot meet the “fair and effective” representation requirements by rolling back to the most recent (pre-Māori wards) representation arrangements. **This would also impose significant additional costs on councils that have not been budgeted for.**
- 8.3. We believe it would be **unreasonable for central government to impose such extra costs on local government without providing funding for this purpose**, as councils are already struggling to contain operational costs and already face **unfunded mandates** under various laws and regulations. We see no provisions in this Bill to cover these costs, and therefore do not support the proposals for the shortened representation review in early 2025.

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<sup>6</sup> A standalone poll cannot take place in 2025 under the Bill (see clause 39(4)), due to the requirement to have a binding poll in conjunction with the 2025 local election, but the estimated standalone cost is provided for that year as a basis for projection to future years.

## 9. CONCLUSIONS AND RECOMMENDATIONS

- 9.1. Northland Regional Council believes that the requirement to hold binding polls on Māori wards and constituencies, upon petition by 5% of electors, represents a **major barrier to establishing and retaining Māori constituencies.**
- 9.2. **NRC requests Government to maintain status quo arrangements** for establishment and disestablishment of Māori wards and constituencies.
- 9.3. Accordingly, **NRC opposes all amendments proposed under this Bill relating to Māori wards and constituencies.**

## 10. Oral submissions

- 10.1. Once again, we greatly appreciate having this opportunity to make a submission on this Bill, and we thank you for your careful consideration of it. We would be more than happy to answer any questions or provide further detail on any of the points we have made.
- 10.2. We would be **grateful for an invitation to also make an oral submission** to the committee.

Signed on behalf of Northland Regional Council



Jonathan Gibbard (Chief Executive Officer)

Dated: 29 May 2024