

## 1. Introduction

1.1. This submission is written on behalf of Whitewater New Zealand, a multidisciplinary, national body of river users. We have a membership base of 4000 people. The West Coast region is of specific importance to us as the wild rivers found there present challenging, rewarding and beautiful expeditions for our members.

## 2. Context

2.1. Due to the nature of our sport, we are the only major community to have an intimate relationship with the wild gorges and canyons on the West Coast. Coupled with the sheer number of fantastic rivers on the West Coast for paddling, the paddling community is a significant stakeholder in this reclassification effort.

2.2. Whitewater New Zealand contends that despite representing approximately 4,000 paddlers nationally, the West Coast is of such high significance to our community, it justifies that significant weight to be given to our submissions.

2.2.1. The West Coast represents something of a 'paddling Mecca' which experiences high numbers of paddlers throughout their paddling careers flocking to the West Coast in order to experience the unique canyons and riverscapes that it holds.

2.2.2. Further to this, the West Coast holds a number of rivers of international standing for paddle sports many highly challenging. As such, they hold a high value to our community, for they represent a peak or aspiration throughout a paddling career.

2.2.3. Finally, the frequency that West Coast rivers are paddled has been on an ever increasing trajectory since the pioneers of white water paddling began paddling there five decades ago. As such we are seeking protection of recreation interests today alongside the increasing interests of tomorrow.

2.3. The experience of exploration and travel along and around the wild rivers of the West Coast over the last five or so decades has resulted in the growth of a deep pool of knowledge shared among the whitewater community we represent. The areas being reclassified on the West Coast that sit outside of our domain of expertise and/or interest have not been commented on as part of this submission.

## 3. General Comments on the Stewardship Reclassification Recommendations

3.1. While it is understood that there is a need to complete this reclassification work in a timely manner, there are significant issues with the quality and depth of some of the assessments and recommendation decisions that will have an impact on future generations of New Zealanders. In particular, recreation and conservation values have been given limited, or in some cases, no assessment or consideration. This submission attempts to address this oversight in part, noting that we do not speak for other recreational groups that like ourselves, have a lot of love for these places, people such as hunters, trampers, canyoneers and cavers.

3.2. With regard to the Western South Island Panel, the panel member with significant expertise in recreation was Mr Les Molloy. Mr Molloy resigned from the panel whilst it was on hold

pending legal action by Ngai Tahu. Under sections 16 and 24 of the Terms of Reference<sup>1</sup>, a replacement panel member with appropriate expertise must be appointed. This did not occur, and it is our view that the oversight is reflected in the absence of the recreational perspective in areas with a very high recreational values.

- 3.3. From the information DOC has provided in the consultation process, the terms of reference for the Mana Whenua Panel is unknown, and it is unclear if or how conflicts of interest were declared and managed. This undermines public confidence in the reclassification process and the quality of some of the recommendations given the obvious influence of the Mana Whenua Panel in the final recommendations.
- 3.4. For most of the following discussion Whitewater New Zealand advocates for the use of Ecological Area classification. Ecological Areas are intended to afford the best protection of the natural resources (including wild rivers, and their surrounding environments) that we value strongly. Concurrently they continue to allow sustainable access both by helicopter and by foot for the purposes of recreation, which is also very important to our community. Whitewater New Zealand understands and appreciates the difficulties that National Park classification can mean for mana whenua principles, and believes that the Ecological Area status provides an apt middle ground to improve mana whenua through appropriate management plans and strategies within the Conservation Act framework whilst protecting the phenomenal environment and riverscapes that the West Coast holds.

#### 4. Inadequate recreational assessments

- 4.1. Whitewater New Zealand is dismayed at the lack of adequate recreational research that has been conducted, as the conservation value reports and recommendations significantly understates (or at times ignores entirely) the paddling interests especially.
- 4.2. **The parcels of land TWP\_05, HOK\_19, HOK\_49 and HOK\_52** (proposed Conservation Park north of Franz Josef), contain the rivers Waitaha, Kakapotahi, Perth, Whataroa, Wanganui, Totara and Mikonui.
  - 4.2.1. These rivers are all of national and international significance to our community, collectively achieving more than a 1000 paddler days per annum.
  - 4.2.2. Whilst all rivers of significance (except the Kakapotahi and Totara) gain some mention of the fact that they are paddled in the conservation value reports, Whitewater New Zealand argues this is a major understatement of the significance of these rivers to our community. They often get one word mentioning that these rivers are 'occasionally' or 'irregularly' kayaked or rafted.
  - 4.2.3. As classic West Coast runs, the Perth and Whataroa are often the rivers where paddlers cut their teeth on difficult heli-kayaking before negotiating harder rivers on the coast. Due to their extremely high quality whitewater, along with many of the others mentioned, they are of very high significance to paddlers in New Zealand.
  - 4.2.4. We cannot see any reference to, nor know of any research conducted or data used to draw conclusions about these rivers, however we argue that they are understated and

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<sup>1</sup> <https://www.doc.govt.nz/globalassets/documents/about-doc/role/managing-conservation/stewardship-land-tor.pdf>

deserve more repute. These rivers make up the backbone of the world class Whitewater available on the West Coast.

- 4.2.5. We urge the Minister that our submission fills in a critical missing piece of information that only we have access to, and therefore we expect our classification recommendation to be given greater weight and consideration.
- 4.3. **The parcels of land HOK\_19 and MAW\_09** (proposed Tarahanga e Toru Historic Reserve) contain the rivers Whitcome, Hokitika, Toaroha, Kokatahi, Styx, Crooked, Taipo, Taramakau and Mungo.
- 4.3.1. The conservation value reports do go some way to explain the recreation value of the area contained. However they fall short of explaining paddling interests adequately and omit many rivers of significance.
- 4.3.2. There is no user data provided to quantify exactly how many recreators this refers to. Nor were any representatives of paddling community consulted to determine the significance of these rivers to our community.
- 4.3.3. Also note, the entire lack of mention of Packrafting, a sport currently exploding in popularity in New Zealand. There is also no mention of club or polytechnic kayaking or rafting.
- 4.3.4. Whitewater New Zealand contends that the mentions above are still a large understatement of the rivers in this area. The rivers contained within are a highly significant hotspot of whitewater runs that the domestic, and international paddle communities, flock to regularly in periods of high rain.
- 4.3.5. It is especially distressing to see no mention of the Crooked River's popularity, a very highly trafficked local run for Canterbury and West Coast paddlers.
- 4.4. More importantly, the (albeit understated) sentiment in the value reports was not carried through into the National Panels' nor the Mana Whenua Panels' recommendation reports (i.e. the recommendations that the Minister is to consider). Both of the recommendations were very brief on the subject of recreation, and under the section 'Identified Recreation Values' there was virtually no mention of any paddle sports, nor anywhere else in the reports.
- 4.5. Whitewater New Zealand contends that this shows that little to no sound research into recreation has taken place within this area. There is no mention of club/ polytechnic kayaking and rafting. There is no mention of packrafting, and no reference to data sources available. **Our submission fills in a critical missing piece of information that we have access to, and therefore we expect our classification recommendation to be given greater weight and consideration.**

## 5. Specific Recommendations

5.1. The following recommendations of the National and Mana Whenua Panels are either not supported or partially supported. Our rationale and perspective is provided, along with the submitters recommended classification.

### 5.2. Wanganui Otira Catchments

Assessment Area	NaPALIS ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Whitewater New Zealand's Recommendation
HOK_19	2805713	Tarahanga e Toru Historic Reserve	Tarahanga e Toru Historic Reserve	<b>Ecological Area.</b>

1. The northern sections of the Wanganui Otira catchments contain one of the most significant clusters of wild rivers with outstanding recreational values for whitewater kayakers and packrafters. The Hokitika, Mungo, Toaroha, Kokatahi, Styx, Taipo and Arahura rivers each have multiple sections with different levels of difficulty, catering for paddlers of differing abilities. Packrafters walk up the Waimakariri from the eastern side of the southern alps over Harman Pass<sup>2</sup> and then paddle down the Taipo river. The area provides world class wilderness whitewater paddling<sup>3</sup>, just a short distance from Hokitika. The degree of concentration of rivers is unique both within New Zealand and on a global basis. These rivers have been paddled extensively and regularly from the 1980's by coasters, people from around the country and regular visitors from around the world. The rivers and surrounding wilderness attracts people to move the West Coast and call this part of the world home.
2. The use and values are summarised formally in the Recreational Values of West Coast Rivers research report<sup>4</sup> undertaken by Andy England, under the guidance of Lincoln University;

“As a collection, the rivers of the West Coast region are the most highly valued in New Zealand and amongst the most highly valued in the world by whitewater kayakers: this is most clearly evidenced by the open ended statements in The Survey but can only be further evidenced by national and international surveys. To whitewater kayakers around the world, the West Coast region is characterised by its rivers and its rivers are characterised by their high levels of challenge, scenery and wilderness.

In comparison to other regions of NZ and the world, the West Coast region has a very high density of rivers offering great whitewater challenge, inspiring river scenery and a strong wilderness feel. Added to this are such qualities as cleanliness and clarity of water, a range of access arrangements including helicopter access, physical closeness of rivers meaning low travel times between

<sup>2</sup> <https://www.packraftingtrips.nz/taipo-river-iiiiii-via-harman-pass/>

<sup>3</sup> New Zealand Whitewater, Graham Charles, 5 editions published 1996, 1999, 2002, 2006, 2013

<sup>4</sup> <http://researcharchive.lincoln.ac.nz/handle/10182/3839>

rivers, and a wider regional experience that offers additional social attractions. That so many rivers of the West Coast are valued so highly does not belittle their assessment, but truly represents their remarkable qualities.”

3. The assessment and Historical Reserve recommendation documents do not outline the outstanding recreational and natural landscape values present in the area. We understand the significance and validity of the mana whenua historical values and the routes and pounamu trails used to move across Te Wai Pounamu. We also draw attention to the active, frequent and regular use of this area by the paddling community, in some ways following in the footsteps of tangata whenua. The use of the land has changed and evolved over time, as it will again in the future.
4. In addition to kayakers and packrafters, the area is frequently visited by canyoneers, trampers and hunters. In this reclassification work, recreational and conservation values must be given appropriate consideration and provided for. Given the current use and frequency, very high recreation, outstanding natural landscapes and ecological values in this area, and the absence of physical historical features, a classification of Historic Reserve is inappropriate. Under this classification the preservation of non-physical historical resources would be the primary purpose for which the land is managed, when it is clear that the vast majority of people enjoying the area are there for wilderness, environmental and recreational purposes.
5. An Historic Reserve is classified under the Reserves Act 1977, rather than the Conservation Act 1987. The proposed 82,000 hectare Historic Reserve with no physical historical structures to conserve is contrary to DOC’s own guidance “that a site should not be classified as *Historic Reserve* unless there is obvious physical evidence of its history remaining on site.”<sup>5</sup>
6. The neighbouring Waitaiki Historical Reserve was vested with Mawhera in 1998 as part of the Ngai Tahu Claims Settlement Act. If we turn to this as a reference model for the management of an Historic Reserve, the paddling community has lost flight access to the upper Arahura river since 2015, for the stated reason of Health and Safety at Work concerns<sup>6</sup>. This however contradicts the advice provided by Worksafe to landowners<sup>7</sup>. Further, there is no transparent process to discuss and resolve such matters with the managing entity, or any recourse to an Ombudsman, OIA request or any ability to appeal decisions made, as would be expected of conservation land vested and administered by an accountable public service.
7. We believe that a classification under the Part 4 of Conservation Act would provide more balanced and appropriate management of ecological, recreational and mana whenua values. It will better protect recreation, conservation and the highly valued whitewater values in this area, requiring public consultation for any works or changes to access arrangements. Specifically, a classification of Ecological Area for this area is sought, as it offers a sound protection framework for recreation values as well as ecological values, and simultaneously protects mana whenua interests if historical values were established as principles the gazetting of the classification and/or relevant management plans.

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<sup>5</sup> <https://www.doc.govt.nz/Documents/about-doc/role/legislation/reserves-act-guide.pdf>

<sup>6</sup> Letter to Mawhera Incorporated from Whitewater NZ 19 Feb 2020

<sup>7</sup> [Worksafe Recreational Access Policy Clarification](#)

8. Notwithstanding the comments above, we would be supportive of a classification of Historic Reserve for the sections of the Taramakau River covered by Schedule 56 of the Ngai Tahu Claims Settlement Act, Statutory Acknowledgement for Taramakau River, subject to the right of public access being guaranteed in the reclassification process and ongoing management plans.<sup>8</sup>

### 5.3. Otira Kopara Robinson Granville Grey

Assessment Area	NaPALIS ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Whitewater New Zealand's Recommendation
MAW_09	Multiple	Tarahanga e Toru Historic Reserve	Tarahanga e Toru Historic Reserve	<b>Ecological Area</b>

1. The Ahaura, Upper Grey/Mawheranui, Robinson, Blue Grey, Waiheke and Taramakau rivers are generally rivers of more moderate gradient than the rivers to the south mentioned above, and as such attract paddlers, rafters, adventurers and families seeking more moderate whitewater through the beautiful West Coast bush. In addition, the rapidly growing community of packrafters<sup>9</sup> combine tramping and whitewater adventures, walking in over the Harper, Amuri and Hope passes to then paddle down the numerous rivers and streams that run through this area.
2. With the rapidly increasing energy costs for helicopter positioning, and the easier gateway that packrafting provides, the use of this area by packrafters, kayaker will only continue to grow over the coming decades.
3. Similar to the rationale outlined in section 5.2. above, current and future recreational use of the conservation estate should be given appropriate weight and provided for in the reclassification work. Kayaking and packrafting is starting to converge, packrafters can also be fishermen, hunters, mountain bikers and cavers. A Historic Reserve under the Reserves Act is by definition held to conserve historic resources as its primary function, yet it appears that the historical resources assessed are cultural and non-physical in nature, making management of these values, over and above other secondary objectives and values (eg recreation and ecological), highly subjective and open to interpretation.
4. Additionally, the Grey/Mawhera River, including tributaries and in particular the Ahaura River and headwaters are subject to a Water Conservation Order (WCO), established in 1991. The WCO was the outcome of a costly and thoroughly contested, evidence-based, judicial process. The technical reports are silent on this matter and the historic reserve status recommendation provides a level of protection significantly weaker than the Water Conservation Order with its land management duties and obligations.

<sup>8</sup> <https://legislation.govt.nz/act/public/1998/0097/latest/DLM430889.html>

<sup>9</sup> <https://www.packraftingtrips.nz/category/westcoast/>

5. We believe that a classification under the Part 4 of Conservation Act would provide more balanced and appropriate management of ecological, recreational and mana whenua values. It will better protect recreation, conservation and the highly valued ecological and whitewater values in this area, requiring public consultation for any concessions, works or changes to access arrangements or future reclassifications. The classification could be gazetted with 2 or more purposes, providing an appropriate balance across the different purposes. Specifically, a classification of Ecological Area for this area is sought. It offers a protection framework for recreation values so long as they sit within ecological values, and simultaneously protects mana whenua interests if historical values were established as principles in the gazetting of the re-classification and/or relevant management plans.

#### 5.4. Kakapotahi/Little Waitaha

Assessment Area	NaPALIS ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Whitewater New Zealand's Recommendation
HOK_49	2805518 2805635	Conservation Park (Waitaha)	Neutral – disposal of pastoral land	<b>Conservation Park (Waitaha)</b>

1. The Kakapotahi river (Little Waitaha) is a road accessible grade 3 -4 valued<sup>10</sup> river, that is navigable over a wide range of flows<sup>11</sup>. The upper Kakapotahi<sup>12</sup> is a higher grade 4+ section, also road accessible with a narrow flow window. Road accessible recreational whitewater rivers are rare on West Coast and as such the Kakapotahi sees a significant amount of use as an accessible highly scenic river with excellent whitewater values. Usage of the two sections of river includes individual groups to visiting club trips from surrounding areas such as Christchurch and frequent use by students and instructors from Tai Poutini Polytechnic.
2. The assessment and recommendation reports are silent on the whitewater recreational values and usage over the last 50+ years, referring only to the occasional hunter.
3. The assessment report incorrectly states that this is backcountry (it is front country) and that there are no DOC facilities in the area. However Happy Valley Road, which is required to access both the river and the track to Pollock Creek hut located further up the valley, sits on DOC land and as such DOC is responsible for the maintenance of this access road.
4. The small area of pastoral land at the foot of the assessment areas is also used as a means of foot access when exiting the river and returning back to Happy Valley Road. As such, if the pastoral portion of the land was to be disposed of as recommended by the mana

<sup>10</sup> <https://www.riverguide.co.nz/guides/kayaking/Mid%20Gorge%20to%20SH6/5d16ba7b7b83b60017c66839>

<sup>11</sup> [https://fb.watch/dLDQAT7L\\_0/](https://fb.watch/dLDQAT7L_0/) Note the number of kayakers on the river at this challenging flow level

<sup>12</sup> <https://www.riverguide.co.nz/guides/kayaking/Upper%20Kakapotahi/5d16ba7c7b83b60017c66903>

whenua panel, continuation of the right of public access across the land must be provided for.

### 5.5. Waitaha

Assessment Area	NaPALIS ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Submitters Recommendation
HOK_52	2805641	Conservation Park (Waitaha)	Stewardship	<b>Ecological area</b>
<ol style="list-style-type: none"> <li>1. Much has been written on the Waitaha river, the Westpower hydro concession application that has been declined, the white water value and the Outstanding Natural Landscapes that surround this area. This submission does not need to add to that body of research and information.</li> <li>2. In June 2022, Westpower Chair Sue Merriman announced that it was “working closely with Poutini Ngai Tahu as its project partner, building on their initial support for the hydro scheme.”<sup>13</sup></li> <li>3. Given the area’s high conservation values and the interest of members of the Mana Whenua Panel as hydro project partners, the National Panel recommendation should be followed.</li> <li>4. Whitewater New Zealand support the National Panel Recommendation to reclassify the area as a Conservation Park to appropriately protect the outstanding recreational, landscape and ecological values for current and future generations.</li> </ol>				

### 5.6. Waitangi Forest (Perth/Whataroa)

Assessment Area	NaPALIS ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Submitters Recommendation
TWP_05	2809665 & 2805503	Conservation Park (Te Taho & Mapouriki)	Neutral	<b>Ecological Area</b>
<ol style="list-style-type: none"> <li>1. The Perth and Whataroa rivers provide excellent whitewater for intermediate and advanced paddlers at low to moderate flows. The rivers are navigable in the drier summer months when other rivers on the West Coast are too low to navigate safely. The</li> </ol>				

<sup>13</sup> Greymouth Star, 5 June 2022



Perth and Whataroa gorges are spectacular, among the very best on the West Coast, and combined with the efficiency of a helicopter base stationed at the Whataroa SH6 bridge, as well as the nearby Okarito lagoon and Westland Tai Poutini National Park, the location is an excellent recreational resource in a spectacular setting.

2. The assessment report has not included the information regarding the pest elimination work (Possums, rats and mustelids) undertaken in the Perth Valley by ZIP<sup>14</sup>, now being extended to over 100,000 hectares from the Whataroa river to the Waiho river<sup>15</sup> and out to the coastline. This work is extending the existing Perth river valley predator free environment to include all of the currently named Waitangi Forest.
3. The scale, investment, ambition and outcome that this work will deliver justifies a stronger conservation classification of Ecological Area. Ecological Area better reflects the outstanding natural landscapes, the UNESCO world heritage status the area currently enjoys, the very high whitewater recreational values, the outstanding natural landscape and the unique native ecosystem resulting from the ground breaking work in removing predators and possums over a very large area.
4. An alternative classification would be to add this area to the National Park, which would link the isolated section of Westland Tai Poutini National Park on the south side of Okarito lagoon to the rest of the Westland Tai Poutini National Park.

#### 5.7. Conservation Park (Hokitika)

Assessment Area	NaPALIS ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Submitters Recommendation
HOK_19,	2805713	Conservation Park (Hokitika)	Neutral	<b>Ecological Area</b>

1. The area covers the entire Whitcombe river catchment and parts of the Waitaha and Mikonui catchments. The recreational values for the Whitcombe river<sup>16</sup> are similar to and geographically contiguous with those in the adjacent block containing the Hokitika, Mungo, Toaroha, Kokatahi Styx and Taipo rivers, proposed by the National Panel to be reclassified as Historic Reserve (Taranga e Toru).
2. The Whitcombe river route has notable history with the crossing from the east coast by Whitcombe and Lauper in 1863<sup>17</sup> via the Rakaia valley and over the Whitcombe pass. This 2 week enduring mission ended in tragedy for Whitcombe on the west coast beach near

<sup>14</sup> <https://zip.org.nz>

<sup>15</sup> <https://predatorfreesouthwestland.nz/>

<sup>16</sup> <https://www.riverguide.co.nz/guides/kayaking/Cropp%20River%20to%20Hokitika%20River/5d16ba7b7b83b60017c668f4>

<sup>17</sup> <https://www.nzgeo.com/stories/across-the-alps/>

the mouth of the Taramakau. For the reasons outlined elsewhere in this submission, we recommend this area becomes Ecological Area and do not believe Historic Reserve is an appropriate classification for this area.

3. We submit and recommend that the adjacent block to the north (2805713, HOK\_19), which is part of the same catchment and landscape of this area be given the same Ecological Area status as outlined in our submission on the proposed Historic Reserve (Tarahanga e Toru) in section 5.2. above.

## 6. Supported recommendations

The following recommendations (of the National Panel) are supported.

- 6.1. Regarding the Haast, Landsborough, Makawhio, McFarlane rivers and surrounding areas are proposed to be classified as Conservation Park. This is an upgrade in terms of conservation status, and accordingly WWNZ supports this recommendation.
- 6.2. Regarding the Paparoa & Kahurangi National Park additions, Whitewater New Zealand wishes to express that we agree with the proposed extensions to National Parks.

Should you have any questions about any of the points above, or wish to discuss in further detail please do not hesitate to get in touch with Whitewater New Zealand.



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