

West Coast Land Reclassification: Whitewater New Zealand Commentary

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Summary of Whitewater New Zealand's Commentary

The recreation research conducted is severely lacking, we argue that no reclassification should occur until more data and information is sought.

Assessment Area - Follow this link to WWNZ discussion	Recommendation Report - Follow this link to Panels' recommendations	National Panel Recommendation	Mana Whenua Panel Recommendation	WWNZ's Hierarchy, 1 = Best outcome for our community 3 = Minimum tolerable outcome for our community
MAW_09	Recommendation - Otira-Kopara and Granville Forests	Tarahanga e Toru Historic Reserve	Tarahanga e Toru Historic Reserve	1. Ecological Area 2. Conservation Park 3. Joint Historic/ Recreation Reserve
HOK_19	Northern Sections - Wanganui / Otira Catchments (North) (PDF, 2.62MB)	Tarahanga e Toru Historic Reserve	Tarahanga e Toru Historic Reserve	1. Ecological Area 2. Conservation Park 3. Joint Historic/ Recreation Reserve
HOK_19	Southern Sections - Recommendation - Wanganui Otira Catchments (part)	Conservation Park (Hokitika)	Neutral	1. Ecological Area 1. Conservation Park (Hokitika)
HOK_49	Recommendation - Little Waitaha River (PDF, 400KB)	Conservation Park (Waitaha)	Neutral – disposal of pastoral land	1. Ecological Area 2. Conservation Park (Waitaha)
HOK_52	Recommendation - Waitaha Forest (PDF, 553KB)	Conservation Park (Waitaha)	Stewardship	1. Ecological Area 2. Conservation Park (Waitaha)
TWP_05	Recommendation - Wahapo (PDF, 1.69MB)	Conservation Park (Te Taho & Mapouriki)	Neutral	1. Ecological Area 2. Conservation Park

Context

In 1987 when the Department of Conservation (DOC) was established, they were charged with public estate (approximately 30% of NZ's land area) for the purposes of conservation.

Conservation means the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.¹

At the time, land which was well understood (ecological, cultural and recreational assessments had been done) was divided into the Specially Protected Areas, National Parks, and reserves (such as Historic Reserves) that we have today. Areas which had not been assessed for conservation values, were classified as stewardship land; a statutory holding pen² for DOC. This was intended to give DOC and Ministers a grace period to do the assessments necessary to make determinations about that land.

In total about 30% of the original land vested in DOC under the Conservation Act was classified as stewardship land. That is 9% of New Zealand's total land area. Stewardship land affords very minimal protection compared to other conservation areas, mining, damming and farming are all possible on stewardship land, despite there being insufficient understanding of the conservation values that these areas hold.

Skip forward 35 years, to today, and very little of the original stewardship land has been reclassified based on conservation assessments (approximately 100,000 ha). So the Government announced an effort to begin this process, Whitewater NZ submitted on this process.³ Whilst we were cautious about this process we were optimistic at the time that it would be finally time areas of land we hold dear were protected in a more permanent way.

Scale

On the 27th of May the two panels dropped 504 recommendations for parcels of land on the West Coast, covering 644,000 ha. The biggest reclassification since the establishment of DOC. For reference, that is about 15 times the size of Paparoa National Park, or just shy of 4 Rakiura, Stewart Islands.

Alongside the 504 recommendations there have been surplus of 1000 documents; technical reports and recommendations to sift through. With 40 working days turn around for submissions. Whitewater New Zealand believes this is an inappropriate time frame due to the sheer scale.

¹ Section 2 Conservation Act 1987.

² Page 9 <https://www.pce.parliament.nz/media/1247/stewardship-land-web.pdf>

³ This will be uploaded to our website, under 'resources'.

Standing

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.

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 more weight to be given to our submissions.

Whitewater New Zealand calls on all of its members, and member clubs to write and submit submissions on a personal basis as well as supporting the submissions by WWNZ.

Risk of development

In developing an understanding of these recommendations it is important to understand the general risk to rivers in the West Coast, specifically hydro-electricity development and mining. Whilst there are currently only two hydro schemes proposed for rivers currently (the Waitaha, Arnold, plus Griffin Creek), the protection that is decided upon in this process, will affect which rivers/ wild spaces are at risk to future development.

WWNZ is pragmatic in understanding that industries such as farming, forestry and mining will continue to be the backbone a major contributor to of the West Coast economy. We also don't outright oppose all hydro on principle (actively support the Arnold Scheme, Amthyst Scheme and the Onlsow pumped hydro scheme) nor do we oppose all instances of mining. That being said, we stand firmly behind the principle that untouched, wild places should remain so.

There is a general risk, specifically, of inappropriate hydro-electric schemes development on outstanding wild rivers with his recreational and ecological values on the West Coast. The West Coast continues to have more expensive energy than the East Coast,⁴ demand for energy is set to rise⁵ and the West Coast Regional Council is actively seeking funding for hydro feasibility studies.⁶

Coupled with this, there have been feasibility studies conducted which suggest there is room for 17 more small scale hydro projects⁷. As mentioned, Whitewater NZ does not necessarily oppose all of these, however we believe it is valuable context when considering the recommendations below.

Recommendations

⁴ <https://www.odt.co.nz/star-news/star-business/trustpower-open-working-third-party-create-scheme>

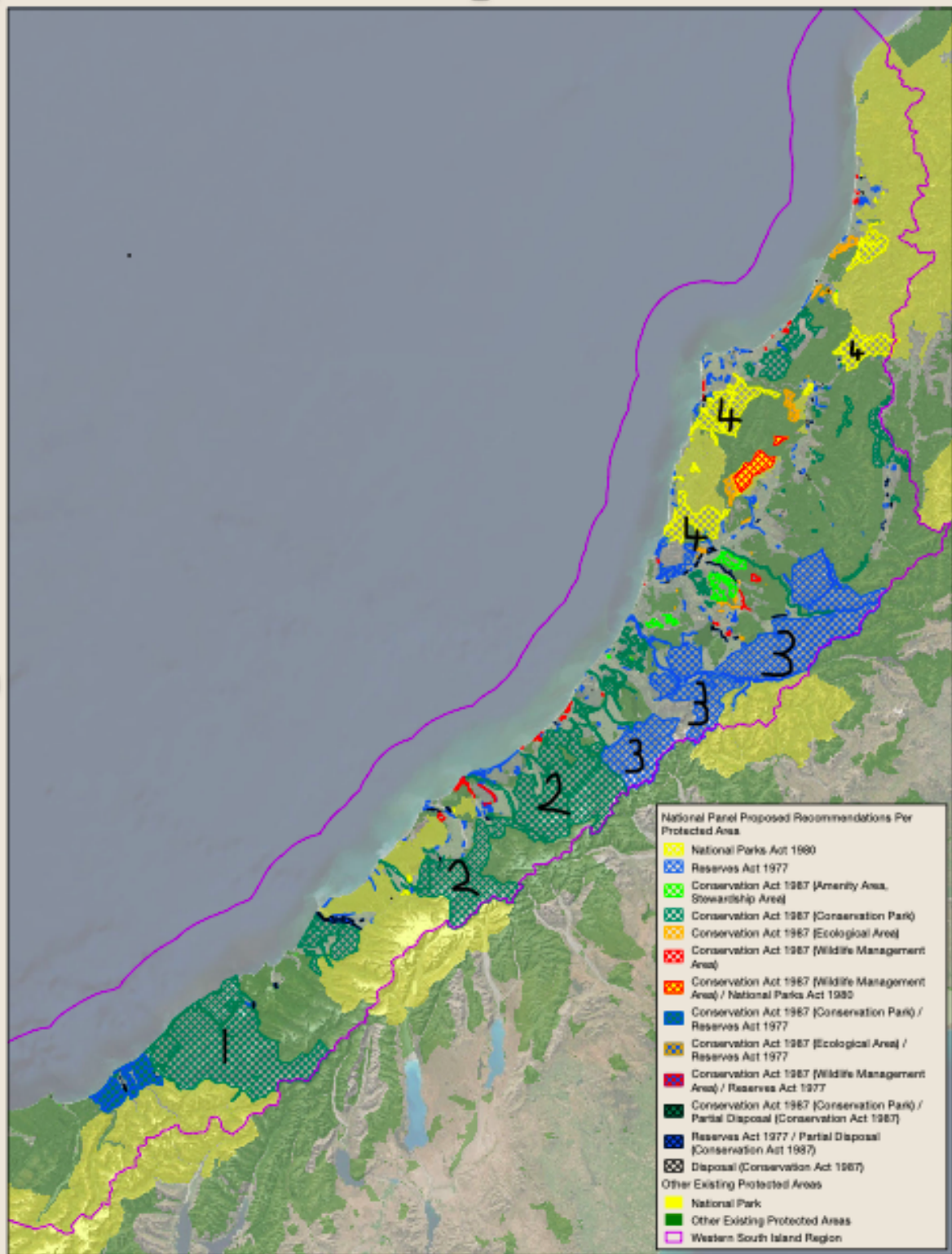
⁵ <https://www.mbie.govt.nz/assets/hydro-generation-stack-update-for-large-scale-plant.pdf>

⁶ <https://www.mbie.govt.nz/dmsdocument/20955-west-coast-regional-council-te-ara-paerangi-future-pathways-green-paper-submission-pdf>

⁷ <https://www.mbie.govt.nz/assets/embedded-hydro-generation-opportunities-in-new-zealand.pdf>

For the purposes of simplicity we have only considered areas of land of concern, that is areas of land recommended to be reclassified that hold rivers of significance to our community.

For simplification we have divided reclassifications into the following 4 areas, this commentary discusses ramifications of the proposed classifications and alternatives Whitewater New Zealand believes to be more appropriate.



Stewardship Land Proposed Reclassifications Western South Island



Map for investigation
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 New Zealand

1. Southern Conservation Areas

Rivers of interest: **Turnbull, Landsborough, Haast, Makawhio, McFarlane,**

The Turnbull river bed is proposed to be reclassified as Local Purpose (River Conservation) Reserve. Whitewater New Zealand supports this.

The Okuru-Waiatoto conservation area and Arawhata conservation area are marked in the large map as still to be reclassified, as such WWNZ will assess these once the recommendations come out.

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.

2. Conservation Park north of Franz Josef

Rivers of interest: **Waitaha, Kakapotahi, Perth, Whataroa, Wanganui, Totara, Mikonui**

The classification of Conservation Park provides improved protection over stewardship land as it enters the realm of specially protected areas under the Conservation Act.

It is held for the purposes of conservation, one of which is recreation. In order for a hydro-lake to be built on Conservation Park, the land must first be disposed of⁸ for which public notice requirements apply⁹. However the nature of protection is permanent:

“Once the land crossed the threshold of special protection ... its designation could only be revoked if its intrinsic values had been detrimentally affected such that it did not justify continued preservation and protection.”¹⁰

However the Conservation Park classification does not preclude mining¹¹. It also does not necessarily preclude a ‘run of river’ style hydro-electricity plant (like that of the Waitaha application). That being said, in order for such a concession to be successful, the Minister must be convinced that the power station is within the purposes of the Conservation Park. Thus the threshold is harder to meet than it has been for such concessions on stewardship land.

Inadequate recreational assessment

The conservation value reports go some way to explain the significance of these rivers, however the panels’ recommendations have failed to consult relevant recreational stakeholders (paddlesports community) given the reverence and major value association our user base has for these rivers. The following are the only documented instances where recreational value of paddlesports have been considered in this process.

⁸ s18 of the Conservation Act 1987

⁹ s49

¹⁰ Harrison & Winkelmann JJ at [68] in Makaroro river decision

¹¹ s170

Kayakers and occasional rafters put in at the Tōtara Valley Road end and paddle down Mikonui River¹² - [Note no mention of paddlers (packraft and kayaks) on the Totara itself nor the Kakapotahi River.]

This is challenging country – the Waitaha River and the Morgan Gorge are very challenging kayak runs. The Wanganui River is also used for rafting and kayaking, including guided operations.¹³

Irregular aircraft landings occur throughout these areas to position hunters, trampers, climbers, rafters and kayakers. Commercial rafting operations occur on the Whataroa and Perth rivers.¹⁴

Whilst all rivers of significance (except the Kakapotahi) gain some mention of the fact that they are enjoyed by paddlers, Whitewater New Zealand argues this is an understatement of the significance of these rivers to our community. 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.

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

HOK_49 - Little Waitaha River

Included in this proposed Conservation part is a seemingly small parcel of land is the first two kilometers of Happy Valley Road, paddler's only access to and from the Kakapotahi river. This is frequently used by our community and should be included in the surrounding area's classification (as Conservation Park, or another specially protected area). The conservation

¹² Page 4:

https://ftp.doc.govt.nz/public/file/ch9mR4nMJkSRN2ISKVl3tA/SLR%20-%20WSI%20-%20HOK_43%20-%20Totara%20-%20Mikonui%20Forests%2C%20Mcleods%20Road%20and%20Mine%20Creek%20MWP%20-%20DOC-6957244.pdf

¹³ Page 3:

https://ftp.doc.govt.nz/public/file/CUuXVPxVW0eFH70pUOc9_Q/SLR%20-%20WSI%20-%20HOK_52%20-%20Waitaha%20Forest%20-%20Technical%20Report%20MWP%20-%20DOC-6957277.pdf

¹⁴ Page 4:

https://ftp.doc.govt.nz/public/file/dt-IHOcg10CLkOKJN7aPEA/SLR%20-%20WSI%20-%20TWP_05%20-%20Waitangi%20Forest%2C%20Okarito%20Forks%2C%20Ferguson%20Creek%2C%20Waitangitahuna%20River%20-%20Technical%20Report%20-%20DOC-6913480.pdf

value report has only included 'occasional hunter'¹⁵. ***This is an error and should be amended to include the large community of paddlers accessing the river.***

Alternatives

Whilst Conservation Park is an improvement, Whitewater New Zealand believes it doesn't go far enough to protect the significance of this area, both ecologically and recreationally. We believe that an Ecological Area would be a more appropriate classification.

An Ecological Area ensures ongoing access to all public, it allows for camping, which many of our community enjoy while paddling in the area. Ecological areas do not preclude helicopter access (subject to concessions). Ecological areas cannot be damned, forested or farmed. They can however be mined.

Additionally the significance of recreation could be included into such a classification with a s18 declaration by the Minister.

3. Tarahanga e Toru Historic Reserve

Rivers of interest: ***Whitcombe, Hokitika, Toaroha, Kokatahi, Styx, Crooked, Taipo, Taramakau, Mungo***

Note that the Arahura valley is excluded from this, and already sits within the Waitaiki Historic Reserve.

The recommendation for this proposed Historic Reserve is that the land first be declared to be held for 'conservation purposes'¹⁶, vested (presumably with Ngāi Tahu), managed jointly by DOC and Ngāi Tahu. There is insufficient detail as to the management plan for this area, as such we have turned to other examples and the legislation to understand what might happen to this area if it were to be classified as an Historic Reserve.

Significantly a Historic Reserve is classified under the Reserves Act 1977, rather than the Conservation Act 1987. Such a large Historic Reserve is unusual, and 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."¹⁷

- There are very broad powers to the organisation whom the management of the reserve is conferred in¹⁸.
 - Dams and mines or other easements can be granted¹⁹.

¹⁵ Page 3

https://ftp.doc.govt.nz/public/file/vSSeHqwxUka8kNwz5G9shA/SLR%20-%20WSI%20-%20HOK_49%20-%20Litle%20Waitaha%20River%20-%20Technical%20Report%20MWP%20-%20DOC-6957270.pdf

¹⁶ Declared to be held for Conservation Purposes s7(1): *means the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.* Conservation Act 1987

¹⁷ <https://www.doc.govt.nz/Documents/about-doc/role/legislation/reserves-act-guide.pdf>

¹⁸ s 58 Reserves Act 1977

¹⁹ s 48.

- o Can be leased for farming.²⁰
- o Can charge fees for admission.²¹
- Additionally, the drafting of the Reserves Act is clear on the point that the purpose of the reserve, in this case 'Historic', as primary²². This means that any changes designed to enhance the historic values can be made, irrespective of ecological or recreational impacts.
- Furthermore Historic Reserves only ever require local public notice in the event of an easement being granted, irrespective of the fact that many of the rivers within the area are of national and indeed international significance.²³

This is a significant deviation from specially protected areas under part 4 of the Conservation Act, where the management of the area and exercising of powers are exercised by publicly accountable bodies, with established strategies, conservation management plans, avenues of notification and redress in the case of mis-management.

Omission of adequate recreation research

The conservation value reports went some way to explain the recreation value of these areas to the National and Mana Whenua Panels. Despite this, the recommendations made, massively underestimate those recreation values and frequency over the last 70 years in particular. Furthermore, the reports are missing reference to any recreation research data or consultation.

- The Conservation value reports go some way to explain this area's value in terms of recreation, the following are extracts from the value reports of southern areas of proposed historic reserve (either side of the Arahura Valley), and downstream of the proposed reserve:
 - a. *These areas at the start of the Styx, Kokatahi, Toaroha and Whitcombe valleys tramping tracks are used by backcountry adventurers, including trampers, hunters and kayakers.*²⁴
 - b. *New Zealanders regard this area as part of the country's backcountry adventurer 'capital' because of the extensive network of backcountry tracks, routes and huts.*²⁵
 - c. *The area is also popular for hunting and fishing. The rivers provide some challenging kayak runs, and some of the larger catchments such as the Lower Taipo, Hokitika and Whitcombe valleys are used for commercial rafting*

²⁰ s 72.

²¹ s 58(c)

²² Historic reserve purpose takes priority over conservation management strategies, section 40A

²³ s 119(1)(b)

²⁴ Page 1,

https://ftp.doc.govt.nz/public/file/dpOH8mwcZkS3e6mzXfHQDQ/SLR%20-%20WSI%20-%20HOK_21%20-%20Hokitika%2C%20Kokatahi%2C%20Toaroha%20and%20Styx%20Riverbeds%20MWP%20-%20DOC-6957157.pdf

(This is the proposed conservation park, which contains the riverbeds of the Styx, Kokatahi, and Whitcombe rivers, and is just downstream of the historic reserve, hence its relevance).

²⁵Page 5:

https://ftp.doc.govt.nz/public/file/iZE4b50Mskydz6azzNtydQ/SLR%20-%20WSI%20-%20HOK_19%20-%20Hokitika%20River%20-%20MWP%20-%20DOC-6957122.pdf

*operations. The section of the West Coast Wilderness Trail is used by locals and domestic cycling visitors from around the country. The Hokitika Gorge Walk is very popular with local, domestic and international visitors.*²⁶

- The following is the extract from the area of land from the Crooked river through to the Grey (inclusive), note the extreme brevity:
 - a. *This area is well-known for recreation, including long treks via huts and popular tramping tracks (including part of Te Araroa Trail), river rafting (commercial), commercial fishing, guiding and horse trekking.*
- Note, there is no user data provided to quantify exactly how many recreators this refers to. Nor were any representatives of Whitewater NZ consulted to determine the significance of these rivers to our community.
- 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
- 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.
 - a. It is especially distressing to see no mention of the Crooked River, a highly trafficked local run for Canterbury and West Coast paddlers.

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 no mention of any paddle sports, nor anywhere else in the reports.

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 only we have access to, and therefore we expect our classification recommendation to be given greater weight and consideration

Lack of ecological research

Additionally, Whitewater New Zealand is alarmed at the lack of sound ecological research that has been done in these areas ahead of reclassification. There are a number of references in both the conservation value reports and recommendations which show the lack of research conducted.

*Although there is a lack of records of freshwater fish species within this large, forested block...*²⁷

²⁶Page: 6 :

https://ftp.doc.govt.nz/public/file/iZE4b50Mskydz6azzNtydQ/SLR%20-%20WSI%20-%20HOK_19%20-%20Hokitika%20River%20-%20MWP%20-%20DOC-6957122.pdf

²⁷ Page 5

https://ftp.doc.govt.nz/public/file/R32xLX-6xky-e77jz8R3Kg/SLR%20-%20WSI%20-%20MAW_09%20-%20Otira

[Regarding freshwater species present in parcels of land surrounding the Arahura Valley] There are likely many more species present, as the area surveyed as a proportion of the total parcel area is very small.²⁸

Crooked River Example

A wedge of land on the true right of the Crooked River received recommendation to be reclassified as Ecological Reserve (a comparatively high level of protection) due to its high ecological values.

*The site comprises mainly forest, with a small area of pasture. For the size of the parcel, the number of freshwater fish records suggest good diversity with kōaro (*Galaxias brevipinnis*), giant kōkopu (*Galaxias argenteus*), dwarf galaxias (*Galaxias divergens*), longfin eel (*Anguilla dieffenbachii*) and common bully (*Gobiomorphus cotidianus*) all recorded as being here through recent records.²⁹*

All of these species are: 'At Risk: Declining', aquatic and migratory. Despite that, the area upstream, (i.e. the rest of the habitat for these declining species and their food source), does not gain such stringent protection by being a part of the Tarahanga e Toru Historic Reserve.

Furthermore, there is clearly inadequate research upstream. The conservation value report for the entire area between Arthurs Pass and the Grey River (including the Crooked River) further explains the inadequate ecological research conducted:

Although there is a lack of records of freshwater fish species within this large, forested block, there is a high diversity of native fish of conservation interest (see Diversity section). It is very likely that all the species listed reside in waterways within this large assessment area.³⁰

Under the historic reserve classification, protection of these species will be considered secondary to the protection of other values. We ask how fish species can be of such high ecological value downstream, but once upstream of Granite Hill the ecological value is no longer significant? It is an illogical distinction between the lower and upper Crooked River, where the ecosystem isn't being protected as a whole. **This, along with the lack of ecological research conducted in the areas ear-marked to become historic reserves is alarming and ought to be addressed before reclassification.**

[-Kopara%20Granville%2C%20Grey%20River%20Māwheranui%20and%20Robinson%20River%20Forests%20-%20Technical%20Report%20-%20DOC-6931072.pdf](https://ftp.doc.govt.nz/public/file/iZE4b50Mskydz6azzNtydQ/SLR%20-%20WSI%20-%20HOK_19%20-%20Hokitika%20River%20-%20MWP%20-%20DOC-6957122.pdf)

²⁸ Page 4

https://ftp.doc.govt.nz/public/file/iZE4b50Mskydz6azzNtydQ/SLR%20-%20WSI%20-%20HOK_19%20-%20Hokitika%20River%20-%20MWP%20-%20DOC-6957122.pdf

²⁹ Page 2,

https://ftp.doc.govt.nz/public/file/rgglUJbPUOQJnSeRdwwZQ/SLR%20-%20WSI%20-%20MAW_49%20-%20Crooked%20River_Granite%20Hill%20-%20Technical%20Report%20-%20DOC-6929736.pdf

³⁰ Page 5

https://ftp.doc.govt.nz/public/file/R32xLX-6xky-e77jz8R3Kg/SLR%20-%20WSI%20-%20MAW_09%20-%20Otira-Kopara%20Granville%2C%20Grey%20River%20Māwheranui%20and%20Robinson%20River%20Forests%20-%20Technical%20Report%20-%20DOC-6931072.pdf

Potential loss of access

Whilst loss of access is not a necessary ramification of the proposed historic reserve, it is possible, and as such not a tenable outcome for Whitewater New Zealand. As outlined above, a number of the rivers that are held dear by the paddling community are within the proposed area, as such we are demanding that assurance of our continued access by foot or aircraft be contained in the new classifications.

The Mawhera corporation, in its management of the Waitaiki Historic Reserve (Arahura valley) has for the last 6 years, denied heli access on the basis of potential Health and Safety at Work Act 2015 liability³¹, despite Worksafe guidance eliminating this risk the land owner. We wish to avoid any potential loss of flight access to other rivers. Further, it is reasonable that the management entity for conservation areas be subject to the same level of transparency and accountability as any other public service organisation such as DOC.

Discussion of an Ecological Area

An ecological area classification does not preclude mana whenua, this can be established through other avenues. For example the Minister can add Historic Values to the classification under a section 18 declaration, that is where the Minister of Conservation declares a second purpose (such as protecting Historic Values) which is equally valued to the Ecological value of an area, then Mana Whenua can be exercised in it's management strategy and plans.

Furthermore an Ecological Area ensures ongoing access to all public, it allows for camping, which many of our community enjoy while paddling in the area. Ecological area does not preclude helicopter access (subject to concessions). Ecological areas cannot be dammed, forested or farmed (however they can be mined). They are also more fitting than Historic Reserve for such a large area.

Discussion of an Amenity Area

Legislated Purposes:

- its indigenous natural resources and its historic resources are protected
- it contributes to and allow for people to appreciate its indigenous natural resources and its historic resources
- It fosters the recreational features of the area.³²

A good fit for the situation, but doesn't necessarily preclude damming or mining. Also doesn't prioritise environmental concerns, such as the unique freshwater ecology found in these rivers. Similar to historic reserves, in that legislative intent of amenity areas is for small areas. But also would be an improvement over Stewardship Land.

³¹ https://drive.google.com/drive/folders/1MLP8b6xISF3hbnE8TICY4xnu82X_d_P6

³² Section 23A Conservation Act

Discussion of Conservation Park

Conservation Park would also be an appropriate classification for this land area, however as we have discussed previously, it does not provide as higher protection as Ecological Area would.

Conclusion

Whitewater New Zealand finds the proposed Tarahanga e Toru Historic Reserve is an inappropriate classification for the area. The Historic Reserve classification relegates ecological and recreational values relative to that of historic values, which are highly interpretive given the absence of physical remains. Due to the lack of sound recreation research conducted as a part of this process our submission fills in a critical missing piece of information that only we have access to, and therefore we expect our classification recommendations to be given greater weight and consideration.

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, as it both requires public consultation for any works/ changes to access arrangements. Specifically, a classification of Ecological Area is sought, as it offers a sound protection framework for freshwater ecology, continued accessibility for recreation, and simultaneously protects Mana Whenua interests if historical values are established as principles in the establishment legislation/ management plans as they arise.

4. 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 the above, please don't hesitate to get in touch with Whitewater New Zealand.

email: president@whitewater.nz

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