



Marie Long  
Director - Planning, Permissions and Land  
Department of Conservation

June 26, 2018

Dear Marie,

As New Zealand's recreational advocacy body for whitewater kayaking, Whitewater NZ would like to extend our appreciation for forwarding the applicant's suggested additional conditions to concession application for the Waitaha river hydro scheme.

Westpower's intention to find acceptable terms to pacify affected stakeholders, and hence gain a modicum of popular support to implement the project, is acknowledged - but the terms are unanimously and soundly rejected by the members of our organization as they do not address our concerns and neither avoid, remedy, or mitigate the adverse effects of the proposal.

The proposed modifications to the application remain completely irrelevant to the myriad matters that demand utmost consideration by the Minister under the Conservation Act. The Minister has a duty to maintain the intent and standards of the Act, and an obligation to reject concession applications that fall outside of those criteria.

If granted as proposed, the Westpower scheme would have major adverse local effects on a conservation area of universally acknowledged outstanding natural values. These major concerns remain unresolved and hence our fundamental reasons for opposing the scheme remain unaltered.

In addition, the economic data to support such a project has been independently scrutinized and found to be utterly lacking any plausible objective merit. The purported benefits of power demand, security, reliability, investor confidence, etc. simply do not justify sacrificing an outstanding landscape from an economic perspective either.

Currently, multiple alternative options exist for hydropower generation on the West Coast; these consented schemes await development in already heavily modified landscapes, yet have been languishing without action because the market incentives do not currently exist to justify their implementation. The Department of Conservation has a duty under the act to ensure that alternative low conservation amenity projects are fully utilised, prior to even contemplating the approval of concessions for unmodified outstanding natural landscapes of exceptional quality like the Waitaha river in Morgan Gorge.

Furthermore, the applicant's proposed 'mitigation' is wholly inappropriate and irrelevant. Morgan Gorge is rarely paddled and by a limited number of individuals to date. Should the concession be granted, the loss of a recreational kayaking resource downstream from the gorge should be viewed as the loss of one of greatest test pieces for whitewater kayaking. The potential for increasing numbers of future aspiring elite kayakers to challenge themselves amongst its fluted schist walls and thundering cataracts would be squandered for a short sighted, economically marginal scheme which would change the raw, wild nature of this sacred place indefinitely.

The applicant's offer is not mitigation - it is a financial incentive to a single recreational group, that it has not been discussed or agreed with any known representative of whitewater kayakers. None of the Outdoor Education tutors and instructors at Tai Poutini Polytechnic, the very employees who would be charged with implementing a 'kayaking trust' were consulted in this proposal. These same instructors are bedrock members of our local whitewater kayaking community on the West Coast, and will all be making individual submissions against the additional measures suggested by the applicant.

Should the proposal by Westpower to further develop recreational potential outside of the context of the hydro concession be a legitimate endeavour of benevolence and collaboration with the community in which it exists, then we would welcome that gesture with enthusiasm and gratitude. However it seems clear that this is merely a offer, contingent on the destruction of a wild river. We feel that the Department of Conservation should not act as an intermediary for such efforts, and must uphold its statutory mandate "to manage for conservation purposes, all land, and all other natural and historic resources and to foster the use of natural and historic resources for recreation."

Morgan Gorge is an stunningly unique zone of exceptionally pristine character, and serves as a beacon of inspiration and place of reverence for the whitewater kayaking community, both nationally and internationally. The Waitaha river remains one of the last unmodified wild rivers in Aotearoa for the vast majority of its course - and as such, represents a prime example of our shared taonga awa. Our collective duty, and DOC's specific fundamental task, is to preserve and protect such places for the use and enjoyment of ourselves and future generations.

Hence we ask that the Department of Conservation process Westpower's application using the appropriate statutory tests, including consideration of all public submissions, with particular focus on obligations under the Conservation Act to guide their decision making. In this case we feel strongly that the Department has no option but to decline the application.

Nga mihi,

Nigel Parry  
President  
Whitewater NZ