

Stewardship Land Reclassification Project
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Attention: Anna Cameron

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New Zealand Canyoning Association's Submission on
Western South Island,
Stewardship Land Reclassification.

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We do not wish to speak to our submission through public hearing

Executive summary

- The NZCA is the representative national organisation for the canyoning community in New Zealand.
- We are concerned that canyoning recreational values have not been considered by the panels, and their recommendations allow for a) access restrictions and b) environmental value degradation.
- NZCA has specific recommendations for land within the proposed Tarahanga e Toru Historic Reserve and the Mikonui catchment, where high-quality canyoning values exist.
- We are an affiliated member of Federated Mountain Clubs (FMC), and submit in support of their general points, and their specific recommendations for the remainder of the lands under review.

About The New Zealand Canyon Association (NZCA)

The NZCA is the national organisation for recreational canyoning, and is a non-profit incorporated society. (<https://nzcanyoningassociation.org/>) Established in 2015 in response to growth in the sport from both New Zealanders and visiting canyoners from overseas; we represent more than 1,600 recreational canyoners from New Zealand and overseas with an interest in the sport here. NZCA supports the KiwiCanyons.org website financially, and our members from the canyoning community have collated information on over 400 canyons throughout Aotearoa. New Zealanders and visiting canyoners from overseas alike, use these resources as a preface to their canyoning adventures, to understand how and where to practise the sport appropriately in NZ. NZCA is also an associate member of NZ LandSAR and provides specialist advice and support for national CanyonSAR training, resources and operations; administering \$25,000 of funding each year for the past few years to enable the development of Canyon Search and Rescue capability.

NZCA strategic objectives include protection of the environment, technical standards, community awareness and training. We run a national canyon festival on a biennial basis which also attracts canyoners from Australia and further afield, and have numerous regional gatherings (meet ups) every summer. We operate a programme where recreational canyoners can apply for funding of canyon projects, and this further assists in the development of the sport.

About Canyoning

For reference, the sport of canyoning is the descent of narrow and confined waterways; and uses a variety of techniques, which are self propelled. i.e no craft (kayak or raft). Canyoning is by its very nature, (due to the environs encountered) a unique sport, and offers those participating an especially rich and rewarding experience with nature, not often experienced in other ways. Canyoning in NZ is practised in many of our national parks and conservation areas in both recreational and commercial capacities. There is a national qualification for professional guides through NZOIA and canyoning is also taught in polytechnics around the country. Internationally, canyoning is a well established outdoor discipline.

The relevance of the Western South Island to us

The Stewardship lands of the South Island's West Coast are of significant importance to the NZCA, the unique geography and geology of this vast area, give way to numerous steep and spectacular water eroded canyon environs. The prevailing weather in this area add another dimension to this terrain, to offer high water volumes in these confined spaces, and it is this combination that makes the area unique and significant. Although canyoning has been practised in New Zealand since the early 90's, popular areas (such as around Haast Pass) have been reasonably well explored by the mid 2010's. However, the top canyons of the West Coast are only just starting to be explored in the last decade. The combination of technical challenge and high water flow mean these West Coast canyons are among the most difficult and spectacular in the country, with many requiring high level technical skill, experience and determination to explore for the first time. These attributes of challenge and beauty also mean that the West Coast has a very high ratio of high quality canyons.

The KiwiCanyons.org website currently lists 33 nationally significant (3 star) canyons, 56 regionally significant (2 star) canyons, and 120 canyons of lesser significance (1star), 8 out of the 35 canyons on the West Coast are 3 star (nationally significant), a proportion of 22% compared with the national average of just 8%.

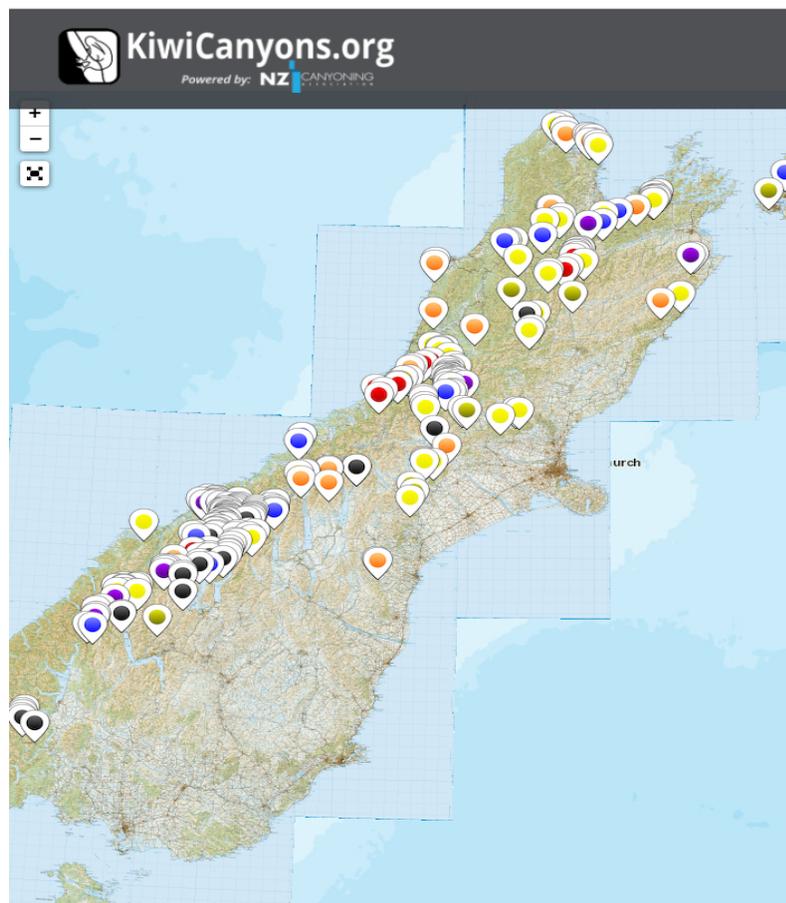
Image below showing mapped/explored canyons of the South Island, with link to the interactive map here:
<https://www.kiwicanyons.org/map/>

In addition, due to the remote nature of these lands and the relative short canyoning season each year, it takes time to explore these special places. Just looking at the topographical and geological maps shows there are undoubtedly dozens more canyons which are nationally significant that will be discovered in the coming years.

It is worth noting, there are few other regions in NZ other than the mountainous areas of Nelson Lakes and the Haast Pass, both of which are encompassed by National Park classification, that offer access via the existing public roads, to remote wilderness canyons such as those found on the West Coast.

As we further understand the special significance of being in and experiencing nature in these unique ways; we also learn that the ever growing human pressures, in this case the need for electricity, will conflict with our need to protect natural areas. The NZCA understands that further development for run of river hydro schemes on the West Coast may be an inevitable outcome with the need to produce more electricity, and inevitably this puts canyon environs at risk. We are not necessarily opposed to run of river hydro schemes. But it is vital that the other values of a place, such as conservation, recreation, culture and so on are properly considered in the decision making process.

We are asserting our position as a relevant stakeholder, as representative of the canyoning community user group, where recreation in streams and gorges is concerned.



Our concerns and our general recommendations

No consultation with the canyoning community

The NZCA is concerned that our communities interests were not considered within the current proposal. In general there appears to have been a failure to adequately consider recreational values and recreational user groups on these lands. The NZCA were not consulted by either the National panel or the Ngāi Tahu Mana Whenua panel.

Threats to access and conservation of existing values

In areas that have been proposed for Historic Reserve or Conservation Park classification, there is significant uncertainty of enduring free and open recreational access to canyons in the future.

Also, these classifications will allow managers the opportunity to exploit the land, whether that be for mining, hydro electricity or other interests. Meaning, the canyons in these areas will be degraded from their current pristine and wild status, diminishing the recreational values of these places.

The current condition of these wild canyons are the very reason our community seeks them out. We place value on the protection of canyon environments for the health of the land and the long-lasting enjoyment, learning and well-being of our community. We do not have confidence that the panels have considered these values. We do not wish to exploit these waterways; only to enjoy them in their natural state whilst we are there. The ability for future generations of New Zealanders to enjoy Aotearoa in this way is vitally important to our national identity and well-being: recreation must be considered as an important value by decision makers. Once an area is developed for hydro electric generation, the natural state of the river is irreversibly altered.

Our general recommendations

Our primary recommendation: That the Department ensures recreational access is provided for, by classifying the land in a way that ensures access is enduring within another relevant statute. Or, ensuring that any Historic Reserve classification expressly preserve practical public access to the recreation sites within the statute.

Our second recommendation: That where high values exist, the Department ensures the conservation and recreational values are not jeopardised by reclassifying the land to a status which allows exploitation, via hydro electric generation, mining or exclusive access for any purpose.

Image: Griffin Creek Canyon
[Griffin Creek v3a5IV***](#)



The NZCA is a member of Federated Mountain Clubs (FMC). We wish to submit in full support of their general recommendations, and some specific recommendations as explained below:-

Our feedback on the specific regional recommendations.

There are several specific areas where we have particular Canyoning interest in, and do not support the reclassification recommendation.

Tarahanga e Toru Historic Reserve

We wish to comment on the recommendation for all the area from Lake Brunner, Southwest to the Hokitika River, for reclassification under the Reserves Act as Tarahanga e Toru Historic Reserve.

This area contains the bulk of the known high-quality (nationally significant) canyoning opportunities on the West Coast, and as explained elsewhere in our submission, likely numerous more canyons given the geology, topography and hydrology.

There are several significant canyons in the current Stewardship Areas. 3 star are nationally significant, 2 Star regionally significant and 1 star locally significant: The canyons include:

Conservation Area - Hōhonu Forest

[Carew Creek v4a3I*](#)

Conservation Area - Wanganui / Otira (North)

[Griffin Creek v3a5IV***](#)

[Big Wainihnihi River v4a4IV***](#)

[Dorothy Creek v4a3II**](#)

[Muriel Creek v4a4IV**](#)

[Deidricks Creek v4a4IV***](#)

On reading the conservation values report for these regions (Hokitika River -Technical Report) , it does not mention the activity of canyoning, which indicates to us that these recreational values have not been considered at all.

Furthermore, although the recommendation report ([Recommendation Wanganui /Otira Catchments \(North\)](#)) says the Historic Reserve classification is “considered to accommodate the identified recreation values, allowing the public freedom of entry and access, subject to such conditions and restrictions necessary for the protection of the identified historic sites” As far as we can determine, these sites are not specifically identified, and the specific intentions and interests of Mana Whenua with respect to access and future land use (such as hydroelectricity, mining and so on) are unclear.

We respect Mana Whenua’s connection to the land and their aspirations to exercise mahinga kai and kaitiakitanga. However we are very uncomfortable with a proposal without statutory guarantees of public access for low-impact recreational activities. The wording in the decision documents and the statute around Historic Reserves does not indicate to us that this public access would be certain, or that managers would be required to conserve the other natural values of the area.

Griffin Creek - an ongoing example of our efforts to preserve recreational values

[Griffin Creek](#), a nationally significant canyon, in the proposed Tarahanga e Tour Historic Reserve, is already in a vulnerable position with a current concession to establish a run of river hydro scheme. [We have been working with FMC to ensure the natural and recreation values are conserved since 2018.](#)

Regardless of the outcome of this ongoing case, changing its classification to Historic Reserve will give this pristine and recreationally important canyon less protection for the future. Because their intentions are not specified, if this area is then vested to Ngāi Tahu as the Mana Whenua panel have requested, then the outcome for public access to this significant waterway is even more uncertain. As a controlling authority, we are concerned they may exercise their power to proceed with the hydro scheme in its most impactful proposed level, without the public being able to have a say. This would be to the significant detriment of the natural and recreational values which we and FMC have gone to lengths to explain.

Our recommendation

NZCA does not support the recommendation for Historic Reserve as it stands: We recommend that either the classification be under the conservation act, or mechanisms to ensure practical enduring access and conservation of other natural values are expressly provided for in any classification under the reserves act.

Hok_35,43,47 – Totara-Mikonui Forests, Tarleton Falls, Mikonui River, Mine Creek, McLeods Road

Conservation Area – Totara-Mikonui Forests (Hok_43)

Our comments relate to this area as we have robust knowledge of the canyoning values within this land parcel which contains three nationally significant (3 Star) canyons:

[Red Granite Creek v4a4III***](#)

[Dickson River v3a4IV***](#)

[Tuke River](#) (Likely to be upgraded to 4 star (internationally significant) status when a second descent confirms the quality.)

The fact that three canyons from the same catchment, all with very high values, it is likely that other catchments contain as-yet unexplored nationally significant canyons. The valley is also very popular for Packrafting, Whitewater Kayaking and has a network of huts and tracks for hunting and tramping. So as well as the very high canyoning values in the catchment, it is important from the perspective of other recreationists, and importantly, its landscape and conservation values are indistinguishable from the Upper Totara Ecological Area it adjoins.

Our recommendation

NZCA does not support the National panel's recommended classification of Conservation Park for this area. We do recommend the Conservation Area – Totara-Mikonui be given Ecological Area classification due to the high ecological and recreational values there.

Hok_52 – Waitaha Forest

The NZCA is only aware of one stream which is partially explored from a canyoning perspective. This is the Whirlling Water, which according to experts who have been exploring it, is "going to be one of the best canyons on the West Coast" and therefore at least 3 star - nationally significant status.

Based on the geology, topography and knowledge of the Waitaha River from our Whitewater Kayaking colleagues, it is almost certain that other nationally or internationally significant canyons will be found in this catchment. This contributes to the very high values already present in the catchment, which deserves the highest possible forms of legislative protection.

Our recommendation

NZCA does not support the National panel's recommended classification of Conservation Park for this area and does not support the Mana Whenua panel's recommendation that it should remain as Stewardship Land.

We do recommend the Waitaha Forest be given National Park status and be an addition to Westland National Park. We also recommend this area be combined with the Conservation Area – Wanganui-Otira Catchments to protect the entire catchment as one.

Areas southwest of the Mikonui Catchment

Although there are few known canyons in the review area southwest of the Mikonui Catchment, there is certainly considerable potential, given the prevalence of canyons in adjoining areas of similar geology, topography and hydrology.

For these areas, the NZ Canyoning association supports the specific recommendations of the Federated Mountain Clubs of NZ (FMC) submission. We believe they have represented general outdoor recreation interests well.