



For action:

**Mr Tim Shaw**

Community Ranger  
DOC Hokitika

For information:

**Hon Eugenie Sage**

*Minister for Conservation*

**Mr Mark Davies**

*Director, Operations  
Western South Island*

**Dr Keith Morfett**

*Deputy-Chair  
Westland Tai Poutini Conservation Board*

**Mr Peter Wilson**

*President  
Federated Mountain Clubs of NZ*

## Griffin Creek: An exceptional recreational opportunity under threat

### Executive summary

Dear Mr Shaw;

Griffin Creek is one of the best, high-volume canyoning opportunities in New Zealand and is of very high recreational value to the canyoning community. We invite you to view a [video testimony explaining the significance of this creek](#).

Our intention for this letter is to inform the decision makers who are considering the concessionaires request to alter the terms of their concession for a hydro scheme in Griffin Creek. They must understand that the impact to recreation of any high-take hydro scheme on Griffin Creek would be severe, and therefore a variation should not be granted.

Canyons with such a combination of qualities as Griffin are rare in New Zealand; there are vast numbers of streams and creeks where the hydro could be built with no impact to canyoners, and little to no impact on other recreational users, and therefore a variation should not be granted.

If the department determines that a new concession application may be lodged, we insist that it should be publicly notified, given the very high recreational significance of the canyon.

The NZ Canyoning Association wishes to be informed of any progress in the decision making around this issue, and be acknowledged as a key stakeholder in any consultation process.

## Introduction

I am writing on behalf of the NZ Canyoning Association (NZCA) which has 338 official members and over 1200 followers on social media. The NZCA was formed in 2015 to advocate for the preservation of canyoning opportunities, and to guide the safe and responsible development of recreational canyoning in New Zealand.

The NZCA is affiliated to the Federated Mountain Clubs of NZ (FMC), which represents over 90 clubs and 21,000 members who recreate in NZ's wild places. The NZCA has liaised extensively with FMC over this issue and has the support of the Federation in this matter.

## The significance of Griffin Creek to the canyoning community

Griffin Creek is one of the most important, high-volume canyoning opportunities in New Zealand.

### **Griffin Creek's Canyoning History**

The first canyoning exploration was on 6th March, 2013, by Nic Barth and Neil Silverwood, who instantly recognised the exceptional quality of the descent.

I had the good fortune to descend Griffin Creek just over 2 years later and found it to be one of the longest, most beautiful, varied and challenging canyons I have ever been lucky enough to visit.

I've been canyoning since 2004, have canyoned in 9 different countries around the world, and made over 40 first descents here in New Zealand. I lead the establishment of the NZCA and in 2015 authored and published the first and only guidebook to Canyoning in NZ. I hold the highest NZ canyoning guide qualification (NZOIA Canyon Level 2) and have co-authored the New Zealand "Canyoning Technical Manual". In short, I am suitably experienced and qualified to say that Griffin Creek would be in the top 3 canyons in New Zealand, and would easily feature in the top 10 of canyons which I have visited around the world.

For advanced Canyoners, Griffin is very high on the list of places to visit, and now that the quality of canyons in NZ is well known world-wide, many international canyoners are coming to Griffin. We received a letter of support from Sonny Lawrence, President of the Federation Internationale de Canyonisme, endorsing the significance of Griffin and the popularity of NZ Canyons with international canyoners.

### **Griffin is unique among canyons we have discovered, for it's *combination* of qualities;**

Together, the whole character of Griffin is far greater than the sum of its parts. To have any of these characteristics altered would hugely diminish the overall experience and destroy a recreational treasure of New Zealand. Griffin was awarded 3 stars in the Canyoning guidebook; to show it is a "Canyon of National Significance".

**It is long but relatively accessible;**

The actual canyon itself takes around 7 hrs for a highly competent team to descend. The fact that it can be reached in 2.5hrs via a challenging track from a main highway makes it a feasible proposition. There are probably a number of other canyons yet to be discovered that are similar to Griffin, but highly isolated, and therefore even if they are discovered, they will never become highly visited.

**It is varied;**

36 waterfalls of significance, with 15 abseils up to 29 meters high, 7 or more jumps up to 12 meters high and 3 slides to 5 meters. Huge bedrock pools more than 30 meters wide with 1 meter high waves. There are huge schist and nephrite blocks the size of cars, and carved bedrock narrows that are barely 2 meters wide and 10-15 meters deep. There are technical climbing sections and committing technical white water swimming sections. In short, this canyon has just about everything that canyons can offer.

**It is difficult;**

The canyon is graded<sup>1</sup> v4a5IV\*\*\*. Where v is for verticality (1-7) and a is for aquatic nature (1-7), the roman numeral for commitment (I-VII) and 3 stars for “nationally significant” quality. The varied features discussed above are sustained; there is very little walking between technical challenges. There are only a few canyons so far explored at this level of difficulty, and the reason for the level of difficulty is the complex, continuous canyon geomorphology combined with the high water volume.

The high water flow in this canyon is the life-blood of the canyoning experience. Without the high flow, the mauri (life-force) of this canyon would be all but gone, and the experience left empty.

To Canyoners, de-watering Griffin Creek is as devastating as building a concrete staircase with handrails to the summit of Aoraki/Mt Cook would be for mountaineers. Sure, you could still go there and ‘climb the mountain’ but experiencing the mountain on its own terms is the reason why people climb.

We want to be able to experience Griffin Creek as it is, as close to nature’s terms as possible.

**A video testimony of the quality of Griffin Creek.**

NZCA member Jake Huddleston produced a [video testimony of the quality of Griffin Creek](#) and NZCA’s appeal to preserve it as it is. On our NZCA facebook page, the video was viewed by over 3,500 people in two weeks. I implore you to take a moment to see for yourself what is at stake to us. As demonstrated in the video, the gorge is certainly not “impassable”; we are in a position to assist the access of any official who should be responsible for assessing the recreational value of the place.

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<sup>1</sup> KiwiCanyons.org Grading Table <http://www.kiwicanyons.org/legend/grading/>

## The relevant management strategies and statutory obligations

### **West Coast Conservation Management Strategy**

The policy on “Activities on or in Beds of Rivers or Lakes”<sup>2</sup> says that;

*“When assessing applications for any activity on or in the bed of a river or lake, consideration should be given to (but not limited to) the following guidelines: a) Adverse effects on freshwater and terrestrial species, habitats and ecosystems, historical and cultural heritage values, public access, recreation opportunities and amenity values should be avoided or otherwise minimised”*

The impact to recreation of any high-take hydro scheme on Griffin Creek would be severe and therefore a variation to the concession should not be granted.

### **Part 3b, 17U of the Conservation Act “Matters to be considered by the Minister”<sup>3</sup>**

This part outlines a lawful reason why a variation to the concession should not be granted;

*(4) The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity—*  
*(a) could reasonably be undertaken in another location that—*  
*(i) is outside the conservation area to which the application relates; or*  
*(ii) is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less;*

Canyons with such a combination of qualities as Griffin are rare in New Zealand; there are vast numbers of streams and creeks where the hydro could be built with no impact to canyoneers, and little to no impact on other recreational users.

Therefore, granting a variation to the concession would be unlawful with the current circumstance. When the first concession was granted, the NZ Canyoning Association did not exist. The NZCA is the representative body for the rapidly growing canyoning community and we insist that the recreational values of this place are considered when making any decisions, in accordance with the law.

NZCA is a key stakeholder in any issues which affect amateur canyoning opportunities on public conservation land, and we insist to be informed of any progress in this matter, and to be consulted in any other future matters where canyoning is concerned.

If the department determines that a new concession application may be lodged, we insist that it should be publicly notified, given the very high recreational significance of the canyon.

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<sup>2</sup> [West Coast CMS](#). 3.7.2 Activities on or In Beds of Rivers or Lakes. Page 150.

<sup>3</sup> [Part 3b, 17U of the Conservation Act “Matters to be considered by the Minister”](#)

## Our understanding of the situation

The NZCA is aware that a concession and resource consent were granted to Griffin Creek Hydro Ltd in 2011. We understand that in 2015 NZ Energy Ltd partnered with the concessionaire to drive the project forward.

We understand that to make the scheme efficient NZ Energy Ltd have applied to double the abstraction rate from 1200L/s to 2500L/s and have the acceptable residual flow lowered from 800L/s to 456L/s. We understand that the applicant has claimed the scheme is not viable without the change.

We do not have access to accurate flow data, but a residual flow of 456L/s is a mere trickle compared with our estimate of more than 2.5 cumecs of unaltered flow.

## What we wish to happen

This letter should provide the evidence that the impact to recreation by granting a variation to the concession would be severe. If the department determines that a new concession application may be lodged, we insist that it should be publicly notified, given the very high recreational significance of the canyon.

There are dozens of alternative sites in the vicinity of Griffin Creek which could be used for hydro generation, which do not contain a recreational resource of such significance. Therefore the variation should not be granted.

The NZ Canyoning Association wishes to be informed of any progress in the decision making around this issue, and be acknowledged as a key stakeholder in any consultation process.

Yours sincerely;

Daniel Clearwater

**President**

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