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# **The Federated Mountain Clubs of New Zealand's Submission on Western South Island Stewardship Land Reclassification**

***We wish to be heard in support of our submission.***

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## Introduction

The Federated Mountain Clubs of New Zealand Inc. (FMC) welcomes the opportunity to submit on the Western South Island Stewardship Land Reclassification. We thank the Panels and officials for their work on this project, especially recognising the tight timetable they have had to work to.

FMC was formed in 1931 and represents 22,000 members in 100 clubs. Our members tramp, climb, hunt, run, white water, canyon, cave, fly unpowered aircraft and more in our backcountry. Together this community is known as recreationists.

Throughout our history, FMC has contributed significantly to the protection of much of the New Zealand backcountry and recreational access to it.

FMC first publicly advocated for a review of Stewardship Land in 2014 through our *Forgotten Lands Campaign* in response to the Parliamentary Commissioner of the Environment's report of the previous year. We thus welcome and strongly support in principle the present review.

## Main recommendations and guide to this submission

### **Recommendations:**

- 1. Where there is general conservation and recreation NGO agreement with a Panel's recommendation, reclassifications and/or disposals should go ahead.**
- 2. For other land parcels, the process should be paused and reviewed in the light of information in this submission, noting that the proposed conservation legislative reform should also be taken into account.**

These core recommendations reflect that FMC has significant concern about many aspects of the Western South Island stewardship reclassification (*Reclassification*).

### **Submission structure**

Part One of this submission addresses high-level aspects of the Reclassification, including:

- a) Treating like for like.
- b) Project purpose.
- c) Conservation and administrative statutory issues.
- d) Panel purpose.
- e) The UNESCO Te Wāhipounamu South West New Zealand World Heritage Area.
- f) Wild Rivers considerations.
- g) Small land parcels.

Part Two addresses reclassification recommendations by area, from north to south.

## PART ONE: HIGH-LEVEL MATTERS

### a) Treating like for like

Relatively low protection status has been recommended for 83% of the land under review although roughly two thirds of land adjacent to these areas is either national park or wilderness area with similar—and in many cases indistinguishable—recreation and conservation values. This suggests a bias in the recommendations, noting that rigorous processes were undertaken when forming the national parks.

There is nothing necessarily wrong with similar side-by-side land parcels being classified and managed differently. However, the PCE's report clarifies that reclassifications are not only for recognising conservation values. At landscape scale, as here, reclassifications are partly intended to align management and decision-making across neighbouring pieces of land that are physically similar but have different classifications. This issue is addressed explicitly in the Panel's terms of reference (16(f)). Key DOC assessment documents are to similar effect.

In short, all of the guidance is that when managing land, like is best treated for like. The proposed reclassifications that differently treat adjacent land would likely perpetuate and even exacerbate management issues arising out of similar land being treated differently.

We are concerned that if land that is indistinguishable in character from adjacent national parks and wilderness areas is lowly-classified in Westland, it can only point to low classifications in other regions during any future fast-track reviews.

### **Recommendation:**

- 3. We seek that land being reclassified should strongly reflect the nature and character of any land adjacent to it that has the strongest protection and management regime. Where a different land classification from an adjacent land parcel has been recommended, an explanation is required.**

### b) Review purpose

FMC welcomed the May 2021 announcement that stewardship land would be reclassified in a concerted and “genuine technical” work programme. On this, we make two points.

Firstly, the original impetus is true to the Conservation Act 1987 (Act), and in particular section 6(b). It is the only purpose that would appropriately protect the land's natural values. The converse is also true. A Reclassification that emphasises speed, or other purpose outside of the Act, is untrue to the Act and to the land's values. Any decision made on these purposes may be vulnerable to challenge.

Secondly, we agreed with the then-Acting Minister that: *It's vital that land with high conservation value is classified correctly to ensure it is protected for its natural and cultural heritage and*

*safeguarded for the future.* Indeed, “safeguarding options for future generations” is part of the legal definition of “conservation” under the Act. This intent is not consistent with ideas of revisiting this Reclassification, as appear in some recommendations.

### **Recommendations:**

- 4. The Reclassification must give land the most appropriate protection consistent with its conservation values.**

### **c) Conservation and administrative statutory issues**

Following is an assessment of the relevant statutory landscape as it relates to stewardship land management and reclassification from a recreational perspective:

- i. When assessing the stewardship land for reclassification, recreation must be considered as an important consideration, as required under Section 6(e) of the Act, i.e. as long as it is not inconsistent with conservation, recreation is to be ‘fostered’. Section 17 of the Act confers a general right of public access to public conservation land. Dogs and firearms are generally allowed.
- ii. Where land remains classified as stewardship, it must be managed for conservation purposes alone, i.e. for “the preservation and protection of natural and historic resources for their intrinsic value”. There is no leeway to depart from this. If a reclassification would weaken the protection of these values – including recreational values – then “doing nothing” is better than “doing something”.
- iii. In the 2015 High Court *Royal Forest and Bird v Minister of Conservation* at [57], the judgment supports this:

*The High Court’s reasoning in Buller Electricity Ltd v Attorney-General is related to the question here but was addressing a different question. Doogue J there considered that, examining the Act as a whole: ... it is apparent that the objective of the Act is to ensure that land which has been reserved for conservation purposes should be so reserved unless there is a good and proper basis for uplifting the protection which has been placed upon the land. This is supported by the title of the Act, the definitions, the functions of DoC that are tied by s 6 to managing land “for conservation purposes”, and the holding of land under ss 7 and 18 “for conservation purposes”...*

- iv. Preservation of public access is not guaranteed in historic reserves. Existing huts and bridges are not provided for and camping is not permitted. Historic reserves may be leased by an administering body, who may use leased areas for a wide variety of purposes. As an organisation charged with the interests of recreationists, this presents concerns for us in the proposed Tarahanga e Toru Historic Reserve. A guarantee

similar to the arrangement for the existing historic reserve in the Arahura is a bottom-line, and appears to have been overlooked by officials. We note that the Minister can revoke a reservation of an historic reserve.

**Recommendations:**

- 5. Where any land falls within our Recommendation 2, its classification must ensure that it has free, certain, enduring and practicable access to and through it for recreational purposes, protects the land from deleterious exploitation and is appropriate for the landscape.**

In addition to these general statutory points, we note that:

- i. In review, there is uneven evidence from which to base recommendations: some report areas cover tens of hectares, some tens of thousands.
- ii. There seem to be inconsistencies arising from the uneven evidence provided. FMC is aware that the panels have not used a consistent process – at least to the extent that nothing beyond a draft process has been recorded in any document. This inconsistent reasoning shows. An example is justification for additions to Kahurangi National Park in Report KAW\_19, which we support. Yet its justification is materially little different from justifications in TWP\_36 and TWP\_43, which recommends areas near Haast to become conservation park or retain them as stewardship land. We note that some of the commentary indicates an even stronger justification for national park status for the Haast areas; for example, materials relating to the UNESCO inscription and in the Mount Aspiring National Park Management Plan.
- iii. More broadly, FMC is concerned at paucity of justification provided for reclassification recommendations – and for *not* selecting other classifications. Robust links between evidence for recommendations and the recommendations themselves are needed.

**Recommendations:**

- 6. Any recommendations deficient on any of the above should be reviewed, and the public given an opportunity to comment on revised recommendations.**
- 7. For transparency and accountability to the public it is essential that proposed classifications be thoroughly explained**

#### d) Panel purpose

The Panels' mission and mandate, composition, and evidential basis for work are key areas of interest to FMC.

The Panels' role has been described three ways since the work was announced. On 28 May 2021, the panels were described as *independent expert national panels ... including technical experts*. Later, the public was informed that *the panels will carry out technical assessments of the conservation and cultural values of stewardship land areas*. This subtle change was positive: the public could expect assessment to be of a genuinely technical nature, as is consistent with the Conservation Act.

While not explicitly stated in the Panels' term of reference, those terms of reference suggested that panellists would collectively interpret provided data, weigh them against available classifications, and select the most suitable. FMC questions whether the work has taken place this way. The panellist with perhaps the greatest understanding of backcountry recreation resigned as the work began and was not replaced despite the terms of reference's panellist replacement mandate (c24).

An example of this is the whitewater values in areas proposed as Tarahanga e Toru Historic Reserve, which have been downplayed or overlooked. Kayaking has been briefly acknowledged, but other values have been omitted. Where values have been mentioned, their relative local, regional, national, and international significance, and participation data have not been included. Packrafting, a relatively new and highly popular form of low-impact recreation, is not referenced. Canyoning is omitted also, as are club and instructional rafting and/or kayaking.

The affected land is highly valued for all these activities, which have significant points of convergence, and go back in some forms to the 1800s, with established participation over the last seven decades. Lack of acknowledgement of the activities' footprint in the relevant land, lack of recognition of specific values drawing recreationists to the area, and even absence of reference to a significant whitewater river, the Crooked, is cause for serious concern.

It is clear that this, and other examples of recreation values have not been recognised. Regardless of the cause/s, if such oversight can occur with respect to some recreational values, it may have affected other parameters. Relevant revision of the work done is needed.

On publication of the recommendations, the Panel's work was described a third way: *The National Panel and Mana Whenua Panel worked together to agree, where possible, on the most appropriate land classification for each area. Where the two panels did not agree, there is a National Panel recommendation and a Mana Whenua Panel recommendation.*

We appreciate the reasons why the Mana Whenua Panel was constituted and we appreciate that the Mana Whenua Panel wished that their views be known to the wider public. It is natural that our view does not always coincide with their view as we have different goals and

aspirations. We have chosen not to comment on the Mana Whenua Panel's recommendations as we believe we are in no position to speak for local iwi.

#### **e) UNESCO Te Wāhipounamu South West New Zealand World Heritage Area**

The Te Wāhipounamu World Heritage Area was inscribed in 1990 following the New Zealand Government's nomination, which was written by the Department of Conservation and supported by Forest and Bird and Ngai Tahu. The inscription honours and preserves the *outstanding universal value* of the natural landforms and intact native forests of South Westland and Fiordland.

It is our nation's duty to protect the area under the World Heritage Convention in line with the commitments made in the nomination. Conservation General Policy provides that the Department of Conservation *will* implement its ratified international conservation agreements.

This commitment requires strong protection, which means that extractive industry activity is not countenanced.

Conferring classification/s allowing extractive activity and low-intensity conservation management within the UNESCO inscription could lead to confusion in management and decision-making, and may put the area's UNESCO status at risk. Accordingly, all areas in the UNESCO site must be included in Schedule 4 of the Crown Minerals Act or through highly protective status provided outside Schedule 4.

This matter is addressed in further detail in the area-level discussion below.

#### **Recommendation:**

**11. Stewardship land within the UNESCO Te Wāhipounamu South West New Zealand World Heritage Area must be included in Schedule 4 of the Crown Minerals Act or through highly protective status provided outside Schedule 4.**

#### **f) Wild Rivers considerations**

FMC's [Wild Rivers park concept](#) was launched in 2020, the most recent step in a long history of FMC river conservation advocacy. Our campaigning for a network of 'wild and scenic rivers' more than four decades ago contributed to Water Conservation Orders being enabled by the Water and Soil Conservation Amendment Act 1981 (also known as the Wild and Scenic Rivers Amendment Act 1981).

The Wild Rivers park concept was created in anticipation of the reclassification project. Our collective knowledge of the land and waterbodies caused us to suspect it should be highly protective, such as national park. Having seen the additional information provided in this process, we make a case for robust protection of the relevant land parcels in detail below. At



this point in our submission, however, FMC simply urges decision-makers to create a strongly protective land parcel focussed on Westland's genuinely wild rivers, whose pristine state is rare internationally.

**Recommendation:**

- 7. Our recommendations for individual land parcels containing such wild rivers are below.**

**g) Small land parcels**

We deal with some smaller blocks of stewardship land below, but small blocks also warrant their own consideration as a tranche.

For smaller parcels, many of which are at public access or other crucial points, classifications should, on their own or with other parcels, provide for enduring public access relating to the parcels themselves and to land beyond:

- The provisions of entry-point land parcels' classifications should not prevent activities allowed on land lying beyond those entry-point blocks. For example, if dogs are allowed on a large land parcel for which the most practical access is through a smaller parcel, that smaller block's classification should allow dogs also.
- Access in perpetuity must be provided for. Where this would be in conflict with commercial or industrial activity, public access must take precedence.
- Where more than one small land parcel provides access to a large block lying beyond, they should in most cases be treated as equally critical for access and classified accordingly, given that climate disruption has potential to alter access significantly.

The above considerations are vital to reclassification decision-making in light of the conservation statutory mandate to foster recreation, in addition to the need for appropriate protection of the land.

**Recommendation:**

**The above advice should be adopted on small parcels.**

## PART TWO: FMC's RECOMMENDATIONS BY AREA

The following recommendations, which run north to south, are accompanied by justifications. In some cases these include identification of risks of inappropriate classifications. As stated in the first part of this submission, classifications must accord with the Act and with administrative law principles.

### Karamea Place

#### KAR\_01 – Mossy Burn (2807687)

FMC **SUPPORTS** the national panel's recommendation for this to be added to the adjacent Kahurangi National Park.

The area comprises unmodified coastal forest. It borders a small area of karst to the south and may contain some karst values. The values in this area are most likely indistinguishable from those within the surrounding Kahurangi National Park.

#### KAR\_- 02 - Oparara River Lagoon (2807683)

FMC **SUPPORTS** the national panel's recommendation for this area to be classified as a wildlife management area.

The proposed classification gives effect to the Reserves Act 1977 Section 3(1)(c) to preserve public access to the coast and to the lagoon while recognising the ecological values of the lagoon.

#### KAR\_09 - Elfin Bluff (2807688)

FMC **SUPPORTS** the national panel's recommendation that this area be classified as a new scenic reserve.

The area, comprising pakihi wetland and forest on a marine terrace, straddles the back and front country zones, adjacent to Kahurangi National Park. It has high natural character and the short Great Rimu Tree Walk offers an opportunity for a wide range of people to experience this type of natural environment and forest ecosystem.

#### KAR\_19 - Blue Duck Creek (2807732), Tidal Creek (2807736), Lyell Range – Radiant Range (2807731)

FMC **SUPPORTS** the national panel's recommendation that the land be added to the adjacent Kahurangi National Park.

FMC supports this recommendation because the land has high ecological and landscape values. We agree that the addition of this to Kahurangi National Park would enhance the landscape connectivity and continuity.

No recreational values were identified by the national panel. However, the tussock tops along the Radiant Range offer a wild and remote tramping experience, allowing for routes that connect the Little Wanganui with the Hemphill River and Mihikonui Catchment.

#### **KAR\_17 - Little Wanganui River (2807700, 2807723)**

FMC **SUPPORTS** the national panel's recommendation that the land be added to the adjacent Kahurangi National Park.

FMC supports this recommendation because it will rationalise the park boundaries and improve connectivity. It is of high recreational value which was not identified by the national panel. It includes a section of the Wangapeka Track which provides access to Belltown Memorial Hut and further into Kahurangi National Park.

#### **Kawatiri Place**

#### **KAW\_-05 - Fletcher Creek (2807743)**

FMC **SUPPORTS** the national panel's recommendation that this area be classified as a new historic reserve.

The area's history of coal mining and timber milling typifies the 19th and 20th economic history of the West Coast. The Charming Creek Walkway is a popular day walk and mountain biking track. The proposed historic reserve which is surrounded by the Radcliffe Ecological Area, would encompass the walkway and protect the regional and national heritage of the area.

#### **KAW\_10 – Waimangaroa – Granity (2807805)**

FMC **DOES NOT SUPPORT** the national panel's recommendation of conservation park and instead **RECOMMEND** this area be added to the adjacent Denniston Scenic Reserve.

We also **RECOMMEND** the portion of this area on the Stockton Plateau (upper Deep Stream) be added to Orikaka Ecological Area or be given scientific reserve status to reflect its high natural values, including habitat for rare powelliphanta snails and kiwi.

This area is the backdrop to the State Highway 67 coast road. It is natural and scenic and contains a number of historic sites with physical remains present that are important for tourism and recreation in the area: Koronui Incline and old town, Millerton Incline, and the Britannia

Track. The area contains large patches of unmodified forest. It shares similar values with the nearby Denniston Scenic Reserve.

#### **KAW\_17 – Mount Rochfort (2808235)**

FMC **DOES NOT SUPPORT** the panels' recommendations.

Instead, we **RECOMMEND** that the old Denniston School Site be classified as an historic reserve, that the Denniston Plateau itself be classified as a scientific reserve, and the remainder of the area be classified as an ecological area as per the surrounding landscape that contains similar values.

The Mount Rochfort Conservation Area has very high ecological, recreational, historic and landscape values. It is a unique landscape important to the Buller area's identity, which is reflected in the fact it receives 16,000 visitors per year.

The Denniston Plateau is a sandstone plateau and contains an important part of Aotearoa New Zealand's natural history. The area contains a rich and unique mix of flora and fauna including species that exist only on the plateau. The area has been described by the panel as an outstanding natural landscape containing high conservation, historic, recreation, and landscape values. Protection of the plateau is in the national interest, and is critical with respect to the biodiversity crisis the nation and the world face and which is within the reclassification project's scope.

While the national panel has recognized the very high values present and the need for protection, it has recommended Denniston become a conservation park, which would give it a low level of protection compared with other potential classifications. The mana whenua panel recommended it remain as stewardship land.

The greatest threat to Denniston is from opencast coal mining. It is important to note that the proposed new classification would provide little if any additional protection in this regard. For example, the [Oceana Gold Globe Progress opencast gold mine](#) (now in rehabilitation stage) and [NZ Coal's Echo mine](#) are both in Victoria Forest Park which is classified as conservation park.

Perhaps beyond the scope of the panels, but important nevertheless, is that the future of the Denniston Plateau is significant to New Zealand's role in decreasing global greenhouse gas emissions: the plateau contains significant coking coal reserves. Mining operations would be opencast, would require removing the unique sandstone capping, would change the landscape forever, and would release significant amounts of methane, a powerful greenhouse gas. They would also require substantial amounts of fossil fuels to be used for mining and transport of the coal to export markets.

It is hard to ignore the presence of coal at Denniston Plateau when reading the panels' recommendations.

### KAW\_19 – Newton River (2807808), Lyell Range – Radiant Range (2807731)

FMC **SUPPORTS** the national panel's recommendation that this area be made an addition to Kahurangi National Park.

The Old Ghost Road has become an iconic walking and mountain biking track important to the Buller economy and as a recreational asset for all New Zealanders and visitors. It is important that the area surrounding the track is given a highly protective classification to protect the conservation and recreation values present and the wild and scenic experience people enjoy on the track.

### KAW\_26 – Ballarat (2808247)

FMC **DOES NOT SUPPORT** the panels' recommendations.

We **RECOMMEND** the area be classified as ecological area.

The national panel described the area as having high landscape and ecological value that contains *a poorly represented naturally uncommon ecosystem type that supports a range of rare and distinct species*.

### KAW\_- 30 - Cape Foulwind Farm (2808261, 2808262, 2808264, 2808266)

FMC **SUPPORTS** the national panel's recommendation that these blocks be classified as new scenic reserves.

The proposed Kawatiri Coastal Trail would run through these blocks creating new opportunities for mountain biking and walking between Westport and Charleston. The proposed scenic reserve classification would secure public access while protecting the areas' high landscape and ecological values.

### KAW\_-32 – Omau Beach (2808258), Cape Foulwind Beach (2808259), KAW\_32 -Tauranga Bay Accretion (2808260)

FMC **SUPPORTS** the national panel's recommendation that:

- 1) Omau Beach and Cape Foulwind be classified as new scenic reserves.
- 2) Tauranga Bay Accretion be classified as a new recreation reserve.

The areas have high recreational value, and contain parts of the Cape Foulwind Walkway, an Icon Visitor site which is popular for short walks. The areas, which are surrounded by private land, will secure public access to the cliff tops, the lighthouse views of the Cape Foulwind seal

colony, and the beach at Tauranga Bay. The proposed classification gives effect to the Reserves Act 1977 Section 3(1)(c) to preserve public access to the coast.

## **Paparoa Place**

### **Pap\_02 – Northern Paparoa Range (2808295), Ananui Creek (2806955) and Little Totara River (2808369)**

FMC **SUPPORTS** the national panel's recommendation that the land be added to the adjacent Paparoa National Park.

FMC supports this recommendation because the land has high conservation, recreation, and landscape values. We also suggest that it be noted the area provides a buffer for the Paparoa Wilderness Area.

### **PAP\_06 – Charleston (2808367), Basin Road (2808292), Nile River (2808366)**

FMC **SUPPORTS** the national panel's recommendation that this area be added to the Paparoa National Park.

The majority of the landscape in this area is composed of karst that was laid down on the ocean floor around 30 million years ago before being subjected to geological forces and uplifted to its present location. Beneath the surface are a number of caves that are nationally and internationally significant because of the natural history preserved within them (23-33 million-year-old fossils and subfossil remains of extinct birds and other wildlife) as well as rare and beautiful speleothems (mineral formations).

We understand that the stewardship area was left out of the park originally because of commercial interests in limestone quarrying. The cement factory has now closed and many of the caves were discovered after the national park was created.

The panels' report on this area identifies just one cave which it wrongly describes as a permitted cave (in actual fact the cave mentioned is popular for recreation as are others in the area). There are 20 other caves in Conservation Area – Charleston which the report doesn't mention at all.

It is important to note that an investigation of Tiropahi Ecological Area, Charleston Conservation Area, and Nile River Conservation Area for national park values and reclassification is a milestone in the Paparoa National Park Management Plan, meant to have been initiated by 2019.

### **PAP\_07 - Four Mile River (2808370), Red Jacket Creek (2808372, 2808373), White Horse Creek (2806939)**

FMC **SUPPORTS** the national panel's recommendation that the land be added to the adjacent Paparoa National Park.

FMC supports this recommendation because the land has high ecological, landscape and geological values. It is a logical addition as it is surrounded by Paparoa National Park.

#### **PAP\_08 – Woodpecker Bay (2808374)**

FMC **SUPPORTS** the national panel's recommendation that this area be added to Paparoa National Park.

The area contains karst – the continuation of the Paparoa limestone syncline. It is likely to be hydrologically linked to the park (meaning what happens on the surface may drain into underground areas in the park). Adding this area would help preserve the integrity of the Paparoa limestone syncline. If all karst areas adjoining Paparoa National Park were to be added to the park, it would become the only significant area of limestone karst to be fully protected in Aotearoa New Zealand. Other limestone karst areas such as Patarau and Waitomo are privately owned, with the majority of the land surface cleared for farming.

#### **PAP\_09 – Fox River (2808375)**

FMC **SUPPORTS** the panels' recommendation to add this area to Paparoa National Park.

The area contains a number of impressive examples of southern rata and is a logical extension to the park.

#### **PAP\_10 – Bullock Creek Farm (2808377)**

FMC **SUPPORTS** the national panel's recommendation that this area be added to Paparoa National Park.

This area contains an impressive example of karst river capture – it is Aotearoa New Zealand's only polje (large flat depression in karst landscape) and is surrounded by soaring limestone cliffs important to the rock climbing community. Bullock Creek sinks through surface gravels and emerges from caves and springs in several places including in Cave Creek South. It contains the underground network of a submerged cave system that cave divers have only just begun to explore. It is believed to be one of the longest and most complex underwater systems in the country. When it rains heavily, the water backs up and fills the Bullock Creek wetland, occasionally flooding the road.

Recent government funding (a \$3.7 million Restoring Nature project) is currently underway here and has supported Conservation Volunteers New Zealand to restore the farmed area by planting thousands of trees.

The farm also includes Cave Creek, site of the tragic 1995 collapse of a platform that killed 14 people. Their families and many others visit the site to honour their memories. Including the Cave Creek Track and platform site in the national park would be appropriate recognition for the victims and their loved ones.

Other popular tracks in the area are the historic Inland Pack Track and the Mt Bovis Track.

It is important to note that investigating adding Bullock Creek Farm to Paparoa National Park is a milestone in the park plan for initiating by 2019.

#### **PAP\_11 - Punakaiki – Coast Road (2806888)**

FMC **DOES NOT SUPPORT** the panel recommendation that the land be given local purpose reserve status.

We **RECOMMEND** a more suitable classification such as scenic reserve be given.

As described above, this area is also part of the Paparoa limestone syncline. The karst features here include sinking streams, tomos, depressions and limestone cliffs. It is almost certainly hydrologically linked with the Paparoa National Park and associated with Cassie's Cave.

Local purpose reserves essentially prioritise land use over conservation. This is a highly sensitive area with complex hydrology. The limestone cliffs here, and directly above the visitor centre, are iconic and viewed by the hundreds of thousands of visitors to Dolomite Point each year ([link to visitor numbers reference](#)).

The land is valuable commercially. There has already been an application for a community centre to be built here; this would have degraded the natural values present. There are a number of accommodation providers nearby. Local commercial interests may wish to use this land for accommodation facilities, which would not be a suitable use for land with such high values.

If the panel chooses to still consider local purpose reserve, a study should be commissioned to understand the relationship between the karst, caves, and hydrology in the reserve so that the values are properly understood before any classification is finalised. It is of note that the [Reserves Act Guide](#) states that this classification should be used for areas that are *generally very small, modified areas*. However this area is 16.7 hectares and the majority of the area is unmodified.



#### **PAP\_14 – Punakaiki River (2806886), Punakaiki Coast Road (2806891)**

FMC **SUPPORTS** the national panel's recommendations to add this area to Paparoa National Park.

The Punakaiki River area is also a karst landscape, carved by the river. There are springs on Waikori Road that have been used as water supply for Punakaiki. Protecting the karst above from the surface (the catchment) will help protect the springs.

#### **Pap\_18 – Paparoa Range South (2806778), Barrytown (2806783), Baker Creek (2806784), Seventeen Mile Bluff (2809052)**

FMC **SUPPORTS** the national panel's recommendation to add this area to the adjoining Paparoa National Park.

The area's natural and landscape values are indistinguishable from those in the national park. A large part of this area has active pest control undertaken by DOC and the Paparoa Wildlife Trust to protect roroa/great spotted kiwi, which the trust monitors. Along the tops, the Paparoa Great Walk traverses this stewardship area.

### **Inangahua Place**

#### **INA\_04 – Inangahua Junction (2807825)**

FMC **DOES NOT SUPPORT** the national panel's recommendations of scenic reserve.

We **RECOMMEND** that this area be added to Paparoa National Park.

This area contains karst and is almost certainly linked hydrologically to Paparoa National Park. It is contiguous with the park and would make a worthy addition. Part of the area makes up the Profanity Cave system catchment. Profanity Cave is regionally significant for recreational caving and has a rich exploration history. An accident in the cave triggered the formation of the national CaveSAR programme (a branch of LandSAR managed by the NZ Speleological Society and NZ Police).

#### **INA\_04 \_ Lower Buller Gorge (2807826), White Cliffs (2807842)**

FMC **SUPPORTS** the national panel's recommendation to add this area to Paparoa National Park.

Comments as above for Inangahua Junction.

#### INA\_08 - Berlins Bluff (2807829)

FMC **DOES NOT SUPPORT** the national panel's recommendation that the land be added to the adjacent Berlins Bluff Ecological Area.

We **RECOMMEND** the area be added to the adjacent Paparoa National Park.

The panel described the area as part of a regionally Outstanding Natural Landscape. It also has high ecological values. It is a wild forested catchment without roads or tracks. The area has high wilderness qualities from a recreation perspective and would also make a logical addition to the adjacent Paparoa Wilderness Area.

#### INA\_23 - Mai Mai - Te Wharau (2806938) , Otututu Valley (2806882)

FMC **SUPPORTS** the national panel's first recommendation that the land be added to the adjacent Paparoa National Park.

FMC supports this recommendation because the area is sandwiched between Paparoa National Park and the Paparoa Wilderness Area. The area has high ecological and landscape value. We note that the area also acts as a buffer to the Paparoa Wilderness Area. The Otututu River has high recreation values in terms of tramping as a wild river to approach the heart of the Paparoa Wilderness Area centred on Mt Uriah. In addition, the tops from Mt McHardy to Mt Epping also have significant recreational values in terms of tramping, not identified by the national panel.

#### INA\_41 - Palmer Road (2807475), Palmers Road (2807509), Upper Grey River (2807474)

FMC **SUPPORTS** the national panel's first recommendation that the land be added to the adjacent Victoria Forest Park.

FMC supports this recommendation because of the area's high ecological and landscape values. It would also be important for maintaining landscape continuity and connectivity. The area is of high recreational value, with opportunities for untracked tramping experiences onto the tops either side of the valley. For instance, up Pinnacle (1500 metres) as described in Tramping in the South Island: Mt Richmond Forest to Arthur's Pass by Sven Brabyn. There are also options for short walks and camping for families in an unmodified and relatively pristine environment that is easily accessed.

#### INA\_43 - Maruia River West Bank (2807875) and Shenandoah (2807815)

FMC **SUPPORTS** the national panel's first recommendation that the land be added to the adjacent Victoria Forest Park.

FMC supports this recommendation because of the area's high ecological and landscape values. It would also be important for maintaining landscape continuity and connectivity. The area is of high recreational value, with opportunities for kayaking and rafting on a section of the Maruia River which is wild and largely unmodified. It also includes a large section of the tramping track which leads to Wheel Creek Hut

#### **INA\_45 - Shenandoah River (2807876)**

FMC **SUPPORTS** the national panel's first recommendation that the land be added to the adjacent Victoria Forest Park.

FMC supports this recommendation because of the area's high ecological and landscape value. It would also be important for maintaining landscape continuity and connectivity being surrounded on all sides by Victoria Forest Park. We would like to note that the western side has high kayaking and rafting recreational values for a largely unmodified section of the Maruia River. This was not identified by the national panel.

#### **INA\_46 - Warwick River (2807455, 2807879)**

FMC **SUPPORTS** the national panel's first recommendation that the land be added to the adjacent Victoria Forest Park.

It is a logical extension to the forested slopes on Mt Rutland within Victoria Forest Park. We would also note it is worth adding to the adjacent Central Maruia Ecological Area overlay.

#### **INA\_47 - Caves Road (2799320), Diamond Creek (2799321), Rappahannock River (2807878)**

FMC **SUPPORTS** the national panel's first recommendation that the land be added to the adjacent Victoria Forest Park.

FMC supports this recommendation because of the area's high natural values. It is a logical extension to Victoria Forest Park which surrounds it. This would provide protection of landscape continuity and connectivity. We would also note it is worth adding to the adjacent Station Creek Ecological Area overlay. The area has recreational values not identified by the national panel. Caves Stream provides walking access that connects to Rappahannock Saddle which provides public access to upper reaches of the Glenroy River. This is a common way for trampers to access the Glenroy River, and further into Nelson Lakes National Park.

## Mawhera Place

### MAW\_01 - Mt Marshall (2808378)

FMC **DOES NOT SUPPORT** the national panel's first recommendation that the land be added to the adjacent Saxton Ecological Area.

We **RECOMMEND** that the area be added to Paparoa National Park.

FMC recommends adding this area to Paparoa National Park because of the area's very high ecological and landscape value. It would make a logical addition to the park to enhance landscape connectivity and continuity. We note that it is adjacent to the Paparoa Wilderness Area and would act as a buffer. The area also has high recreational values in terms of tramping. There are options for off-track tramping trips to Mts Johnston and Marshall, with opportunities to camp and enjoy tussock tops and basins.

### MAW\_21 – Rapahoe (2809049), Seven Mile Creek/Waimatuku (2809050)

FMC **SUPPORTS** the national panel's recommendations that this area be added to the Coal Creek Wildlife Management Area. An alternative suitable classification would be scenic reserve.

The area contains karst and is associated with a cave called Cavern Creek. We are unsure of the exact boundaries of the cave system, but the recommendation report does not reference this value at all. An assessment of the karst values should be made, and reconsideration be given to a higher classification to reflect them.

## Hokitika Place

### Proposed Tarahanga e Toru Historic Reserve

MAW\_09 Granville Forest (2807465), Grey River/Māwheranui (2807468, 2807469), Otira-Kopara Forest (2807512), Robinson River (2807517), Crane Creek - Haupiri Road (2807522), Robinson River (2954675)

MAW\_53, Hōhonu Forest (2806524)

HOK\_01, 03, 19 Taramakau Riverbed (2809263), Kumara - Wardens Road (2809268), Taramakau River / Ōtira River (2806316), Wanganui / Otira Catchments (2805713), Kawhaka Forest (2805715), Wainihinihi Creek (2805714)

FMC **SUPPORTS** the panels' recommendation of historic reserve where it applies to sections of the Taramakau riverbed/river mouth that contain physical evidence of the history on site, consistent with the [Reserves Act Guide](#), as well as the nohoanga site and the full Deed of Recognition area. (*HOK\_01: Conservation Areas – Kumara, Kumara-Wardens Road, Taramakau Riverbed and HOK\_03: Conservation Area – Taramakau River / Ōtira River*)

FMC **DOES NOT SUPPORT** the panels' recommendation for classifying the rest of the area proposed in the Tarahanga e Toru Historic Reserve as it would not adequately protect the very high landscape, biodiversity, recreation and cultural/historic values present. (*MAW\_09: Conservation Areas – Granville Forest, Grey River/Māwheranui, Otira-Kopara Forest, Robinson River, Crane Creek-Haupiri Road; MAW\_53: Hōhonu Forest and HOK\_19: Conservation Area – Kawhaka Forest, Wanganui / Otira Catchments*)

FMC **RECOMMENDS** that the area be given national park status which would acknowledge the areas' human history and allow the people of today and tomorrow to transcend time, to experience the landscape as early people did. Clearly the values present are those of a national park and it is in the national interest to provide the highest level of protection.

The mana whenua panel has suggested that the proposed reserve be vested in Ngai Tahu. We appreciate that this is beyond the scope of the process, but if this were to take place, there would need to be guarantees that free, enduring public access is maintained and the outstanding landscape values are preserved.

## Values – Biodiversity and Recreation

The area both panels have recommended for historic reserve from the Grey River to the Whitcombe River is 182,000 hectares, more than four times the size of Paparoa National Park (42,900 hectares) and two and a half times the size of Aoraki-Mt Cook National Park, (72,100 hectares). It adjoins Arthurs Pass National Park along its eastern border and shares many of the same natural, historic, and recreational values as that park. The proposed historic reserve contains about 60 kilometres of the Southern Alps, numerous peaks over 2,000 metres, many small remnant glaciers, 300-400 kilometres of river, about 60 backcountry huts, and over 200 kilometres of backcountry tracks. With this large network of tracks and huts, the area has high recreational values and a long established history of multi-day backcountry tramping, mountaineering and hunting trips.

The primary difference between this area and Arthurs Pass National Park is that the stewardship land is more remote and further away from roads and human developments. The natural soundscape is largely uninterrupted, and the vast landscape remains almost as it was before humans arrived. The area is a stronghold for taonga species including kea and whio.

The extensive river systems, gorges and canyons in the area also set it apart from Arthurs Pass and other places. It is comparatively unique in New Zealand with 12 significant kayaking rivers and numerous recreational canyons, including three-star (nationally significant) Griffin Creek, one of the top-rated canyons in the country. The New Zealand Whitewater guidebook provides a good description: *There is no doubt that the rivers [on the west coast] are world-class. They are challenging, remote, uncrowded, scenic beyond belief, and most importantly ours to protect.* Neither panel recognised these characteristics here and only a brief reference to the kayaking was noted in their reports.

The area unquestionably deserves the highest level of protection possible for the conservation, recreation, landscape, and historic/cultural values present and a strong case could be made for its addition to Arthurs Pass National Park. Some parts of this area would even meet the criteria for wilderness classification.

With the exception of the physical sites in the Taramakau riverbed, historic reserve provides very little protection for any of the other values mentioned, including preserving the wider landscape of early Māori history. Remote camping would no longer be possible. In FMC's view, historic reserve classification could allow for management and development that is inconsistent with the recreational and biodiversity values present.

### **Risks to the land's values from commercial interests**

Existing and emergent invasive/extractive commercial interests pose risks to the land's conservation and recreation values. Two industries are addressed below as examples. A classification that provides primary protection for conservation values and others is needed.

### **Gold and other mineral resources**

There are numerous gold mines on public conservation land on the Coast.

Minerals West Coast has released a detailed [report](#) on the future of mining on the West Coast. There are significant gold sources and the potential for rare earth minerals identified in the proposed historic reserve. All are in areas inappropriate for mining from recreation and conservation perspectives. Details on the quantities and commercial viability are not published; however, a single gold reef can produce a substantial volume of gold.

Threats posed by mining interests should be taken into account in decision-making.

### **Hydroelectricity**

Another area of concern relating to the proposed historic reserve is potential for hydroelectric development in this area of pristine unmodified rivers important for recreation and biodiversity. Two thirds of the world's longest rivers no longer flow freely and 65% of all waterways are regulated before they reach the sea. New Zealand has 3,284 dams and structures which

regulate rivers and streams. The proposed historic area presently contains just one small hydro scheme.

When environmental and recreation organisations were campaigning against a Waitaha hydro proposal, the wholesale electricity price was around \$70 per megawatt hour (MWh); now it is on average around \$120 per MWh. Forecasts show a projected increase in 2022/23 and beyond.

Long-term weather predictions suggest that due to climate change, rainfall will decrease in the eastern South Island and increase in Westland, with projected increased demand for electricity generation on the Coast (despite some expert opinion that New Zealand can reach 100% renewable electricity without hydro generation through improvements in wind and solar capacity).

The Ministry for Business, Innovation, and Employment's 2020 [study on regional hydro capacity](#) identified 17 sites in the western South Island with 12 on stewardship land. It notes that for viability, a reasonable volume of water, relatively steep catchment, and proximity to transmission lines are needed. A number of rivers in the proposed Tarahanga e Toru Historic Reserve have these qualities.

Additionally, two rivers in the proposed historic reserve are mentioned in [this report](#) by the New Zealand Infrastructure Commission as suitable for large scale hydro/dams.

Hydro construction should be taken into account as a risk to the integrity of the area's landscape and its conservation and recreation values in decision-making.

## Public Access

In the classification report, the mana whenua panel stated its desire for the proposed historic reserve to be vested in Ngāi Tahu. Vesting under the Reserves Act 1977 means handing over control and management to a local authority or other entity. The mana whenua panel has also suggested that Ngāi Tahu be given decision-making powers (usually exercised by the Minister of Conservation).

The Reserves Act also provides for the ability for a managing authority to charge for access to historic reserves. Guaranteed free public access should be a bottom line in any classification of large areas of public conservation land.

## Suitability for historic reserve classification

As outlined above, historic reserve classification is a poor fit for a large portion of the stewardship area proposed to become Tarahanga e Toru Historic Reserve. It would not provide appropriate protection for the conservation and recreation (including public access and camping) values present. FMC acknowledges that specific areas *should* be protected as historic

reserve but the vast areas of land around them should be given a more appropriate classification.

(Refer to the [ArchSites mapping tool](#) to see the locations of registered archaeological sites in the proposed historic reserve; they are sparse outside of the Taramakau.)

**HOK\_01 – Kumara (2809267); HOK\_04- Chesterfield (2809278); HOK\_04 – Kapitea Creek (2809292); HOK\_06 – German Gully (2806209); HOK\_07 – Stafford (2809279); HOK\_10 – Big Dam Hill (2809285); HOK\_12 – Duffers Creek (2809283)**

**FMC SUPPORTS** the national panel's recommendations for these areas, that:

- 1) Kumara, Greymouth - Kumara, Kumara Cashmere Street; Kumara - Town Belt North; Kumara Straight form part of a new conservation park (Kohimara).
- 2) Chesterfield & Kapitea Creek form part of a new conservation park (Kapitea).
- 3) German Gully, Stafford, Big Dam Hill form part of a new conservation park ( Waimea).
- 4) Duffers Creek & Lake Mudgie form part of a new conservation park ( Okuku)

The area contains abundant evidence of long Maori and later European occupation and use of the land. There are also short walks, and a section of the West Coast Wilderness Trail – a mountain biking day trail from Greymouth to Ross. The area is also used for hunting. Given the historic and recreation values of these areas, and their proximity to Hokitika, the proposed classification is appropriate.

**HOK\_17, 18, 22- Blue Spur (2809289), Kaniere Forest (2805691), Kaniere Farm (2805693, 2805694)**

**FMC SUPPORTS** the national panel's recommendations for these areas that:

- 1) Blue Spur, Blue Spur Road, & Blue Spur Range form a new conservation park (Houhou).
- 2) Kaniere Forest & Kaniere Farm form a new conservation park (Kaniere)

The blocks contain a diverse range of ecosystems, including examples of lowland forest and wetlands, and heritage values associated with nineteenth century goldmining. The areas are situated in Backcountry and Front country recreation zones. There are a number of popular local walks, including the Kaniere Water Race and Blue Spur walkways. The West Coast Wilderness Trail - a mountain biking day trail from Greymouth to Ross – passes through the area. Additional sections of the Wilderness Trail may be constructed in this area.



#### HOK\_20 – Aickens Base (2806317)

FMC **SUPPORTS** the national panel's recommendation for this area to be classified as a new recreation reserve

The area is situated close to the confluence of the Otira and Taramakau rivers, at the start of the route to these valleys. The carpark receives a lot of use and there are no other public places in the immediate area where people venturing into the valleys can leave their cars.

#### HOK\_26 – Takutai (2805689)

FMC **SUPPORTS** the national panel's recommendation that this area be classified as a new recreation reserve.

The block of land adjoins Southside Recreation Reserve and would extend public access to the beach and the south side of the Hokitika River. The proposed classification gives effect to the Reserves Act 1977 s3(1)(c) to preserve public access to the coast.

#### HOK\_30 – Mananui Bush (2805696)

FMC **SUPPORTS** the national panel's recommendation that this area be classified as a new scenic reserve.

The block of land contains a locally uncommon example of coastal sand dune forest, containing the Mananui Bush Walk which provides public access to the beach. The proposed classification gives effect to the Reserves Act 1977 s3(1)(c) to preserve public access to the coast.

#### HOK\_32 – Frosty Creek (2805697)

FMC **SUPPORTS** the national panel's recommendation that this area be classified as a new scenic reserve.

The block of land of old growth rimu forest and wetland is surrounded by Lake Mahinapua Scenic Reserve, containing the Mananui Tram/Mahinapua Walkway, which forms part of the West Coast Wilderness Trail.

#### Hok\_19, 21, 33 Hokitika-Kokatahi riverbeds (2805712, 2805690), Wanganui-Otira Catchments (part) (2805713, 2805713), Butlers (2805698, 2805698)

FMC **DOES NOT SUPPORT** the national panel's recommendation to classify Conservation Area – Wanganui Otira Catchments (part) as conservation park.

We **RECOMMEND** Conservation Area – Wanganui Otira Catchments (part) be added to the Westland National Park to reflect its high values. We also recommend this area be combined with the Conservation Area – Waitaha Forest to protect the entire catchment.

*The following comments cover Conservation Area – Wanganui Otira Catchments (part).*

This area contains a section of the Southern Alps, Ivory Lake, the upper Waitaha River and many kilometres of pristine, unmodified waterway. It is also home to a number of taonga species that are threatened or at risk of extinction. It has very high landscape, recreation, conservation, and cultural values and is in the national interest to protect. The values here can only be described as similar to those found in gazetted wilderness areas or national parks in New Zealand and overseas.

The conservation values report highlights the area's historic and cultural values but gives an inadequate description of its high recreational values such as canyoning and whitewater kayaking. The area contains nationally significant river systems and canyons as well as a wide range of backcountry tracks and huts and off-track experiences important to hunters and trampers.

To achieve landscape scale conservation of the area as far as possible from the mountains to the sea, this area should be combined with the Waitaha Forest as one large national park or ecological area.

### **A case for full catchment protection of the Waitaha River**

The Waitaha River is one of the most dramatic rivers in New Zealand. The historic Ivory Lake Hut, at its source, was used by scientists studying Ivory Glacier. Below the hut's dramatic perch, the river tumbles down a series of cascades and flows through alpine meadow before disappearing into the foreboding Windhover Gorge.

The middle sections of the Waitaha River are pristine and remote, marked by huge boulders moved by Alpine Fault ruptures. It then flows through alluvial fans before entering Morgan Gorge, one of the most awe-inspiring places imaginable.

The catchment is home to many at-risk or threatened native species including whio, found throughout the river's length and in its tributaries, and kea in the subalpine and forest environment. Powelliphanta have been found in the upper reaches and Kiwi Flat, just upstream of Morgan Gorge, is a stronghold for long-tailed bats. Other threatened bird species in the Waitaha include the New Zealand falcon, grey duck and South Island kaka as well as South Island pied oystercatcher, black shag, long-tailed cuckoo, South Island fernbird and New Zealand pipit ([link to report](#)).

The current recommendations effectively cut the Waitaha River in half with the upper and lower portions of the catchment split between two proposed conservation parks.

The Waitaha catchment meets the high bar of containing national park values. Combining the Waitaha Forest Conservation Area and the Wanganui-Otira Catchments Conservation Area would be an appropriate way to help manage the area more holistically.

## Hok\_52 – Waitaha Forest (2805641)

FMC **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 **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.

The Waitaha River here is contested with a company wishing to build a run-of-river hydro scheme at Kiwi Flat and Morgan Gorge. However, in 2019, the application was declined by Minister for the Environment Hon David Parker on the grounds that: *The area is largely unmodified by humans. It is near to pristine and yet is accessible for recreation. The area is valued for its natural beauty and wilderness qualities for recreation. The proposal would have significantly undermined the area's intrinsic values which people experience when they tramp and kayak there.*

Just days after National Panels released their recommendations, Westpower announced they would seek a reconsideration of Minister Parker's decision in partnership with Ngāi Tahu. This calls into question the reasons for the mana whenua panel's recommendation that the area remain as stewardship land as well as the relatively low conservation status recommended by the national panel.

Given the thoroughness of Parker's analysis when he made his decision and the more than two years between the decision and the reconsideration application, FMC's view is that it's time to move on and give this area the protection warranted by its high natural and recreational values as described in section Hok\_19, 21, 33 above ([Link to David Parker's decision letter](#)).

## Hok\_35,43,47 – Totara-Mikonui Forests (2806269), Tarleton Falls (2806245), Mikonui River (2805512), Mine Creek (2809720), McLeods Road (2805513)

*Comments relate to the Conservation Area – Totara-Mikonui Forests (Hok\_43) as we have robust knowledge of the land parcel.*

FMC **DOES NOT SUPPORT** the national panel's recommended classification of conservation park for this area.

We **RECOMMEND** the Conservation Area – Totara-Mikonui be given ecological area classification due to the high ecological and recreational values there.

The Mikonui River catchment contains impressive mountainous terrain and canyons, including the three-star (nationally significant) Red Granite Creek canyon as well as a large network of

backcountry huts and tracks. It is an important place for whitewater kayaking, tramping and hunting. Its landscape and conservation values are indistinguishable from the Upper Totara Ecological Area it adjoins.

## Te Wahipounamu Place

### TWP\_05 – Waitangi Forest (2809665), Okarito Forks (2805302), Ferguson Creek (2805654), Waitangitahuna (2809661, 2809662)

*Comments relate to the Conservation Area – Waitangi Forest (Perth/Whataroa catchments), which FMC knows well.*

FMC **DOES NOT SUPPORT** the panels' recommendations for the Conservation Area – Waitangi Forest to be reclassified as a conservation park.

We **RECOMMEND** the area be given a higher classification befitting its natural and recreational values. It should be added to the Westland Tai Poutini National Park.

We **RECOMMEND** addition of suitable parts of this land parcel to the Adams Wilderness Area.

The Perth and Whataroa river catchments cover an enormous area (53,834 hectares) larger than the whole of Paparoa National Park. The area contains dramatic mountainous terrain including peaks that are part of the Southern Alps, and more than 20 glaciers. Ice Lake, located in the head of the Whataroa, is one of the most iconic glacial-carved lakes in the Southern Alps and a destination for trampers. Parts of this land fit criteria for gazettal as wilderness area.

The area also contains vast native forests. The high-volume, electric blue rivers cut through dramatic gorges and are iconic for their colour which comes from the glacial sediments they carry, called 'rock flour'. The area is highly prized by whitewater enthusiasts and contains some of the finest whitewater kayaking and packrafting in the country. It is an iconic area for trans-alpine tramping and contains challenging mountaineering opportunities.

Since 2018 Zero Invasive Predators (ZIP) has been working in the Conservation Area – Waitangi Forest to eradicate introduced predators from the Perth River valley. In partnership with DOC, iwi and other organisations, they've spent millions of dollars and have virtually eliminated possums, rats and stoats from the area. In 2021 ZIP expanded its work to become New Zealand's largest predator project costing an additional \$45 million. Now that predators have largely been eliminated, native species will begin to thrive, making the area even more important for biodiversity and science as well as recreation.

To the south, the area borders the Westland Tai Poutini National Park and to the east it borders Aoraki-Mt Cook National Park. The Adams Wilderness Area shares its northern border. Nearly half of this stewardship area is in the Te Wāhipounamu - South West New Zealand UNESCO World Heritage Area.

Given its incredibly important and iconic neighbours, its world heritage status, and the large sums of money spent on predator control, the area should have been recommended for national park classification.

**TWP\_36 – Cook River/Weheka to Haast River (2804986), Mahitahi Riverbed (2804993, 2804993), Paringa Bridge (2804994)**

FMC **DOES NOT SUPPORT** the national panel's recommended classification of conservation park for this area.

We **RECOMMEND** the area be given a higher classification befitting its natural and recreational values. It should be added to the Westland Tai Poutini National Park.

We **RECOMMEND** addition of suitable parts of this land parcel to the Hooker/Landsborough Wilderness Area.

The Cook River/Weheka to Haast River area is located in the Te Wāhipounamu - South West New Zealand UNESCO World Heritage Area. It contains some of the highest value public conservation land on the Coast including vast, remote areas of native forest, large wetlands, hundreds of kilometres of pristine river, numerous glaciers, and a large portion of the Southern Alps. Tawharekiri Lakes, just north of Haast, is listed in the West Coast Tai Poutini Conservation Management Strategy as an internationally significant wetland. Portions of this area would even make a worthy addition to the Hooker/Landsborough Wilderness Area.

If the pastoral area of the Conservation Areas 'Mahitahi Riverbed' and 'Paringa Bridge' are considered for disposal, DOC should ensure an easement or marginal strip is put in place to ensure access to the backcountry is maintained.

**TWP\_43 - Okuru-Waiatoto (2800930), Okuru – Turnbull River (2800941), Grassy (2800935), Collyer (2800947) & Nolans creeks (2800946)**

FMC **DOES NOT SUPPORT** the panels' recommendation of conservation park

We **RECOMMEND** the area be added to Mount Aspiring National Park.

This area is a significant part of the Te Wahipounamu World Heritage Area, and is deserving of our highest level of protection in national park. This addition would mean that Mount Aspiring National Park would preserve and protect a whole ecosystem ranging from the icy summit of Mt Aspiring at 3033 metres, through all the gradation of altitude and climate, to sea level. Indeed, it was the decision in 1989 to include the South Westland swamp kahikatea and terrace rimu

forest as conservation land that freed up the way for UNESCO to give, in 1990, World Heritage status to the entire south-west of the South Island.

Such an addition to Mount Aspiring National Park would provide for connectivity and continuity. This would especially be important for consistent management of this special area.

The area has extremely high and unique ecological, landform, and landscape values. The Haast coastal plains, along with those north of the Haast River, and South of the Waiatoto River, make up the greatest area of unmodified wetland remaining in mainland New Zealand. Large areas of podocarp forest still cover the coastal plain. In addition to high conservation values there are equally high recreational values including walks and kayaking. We would note, further, that the area provides access to the Okuru and Turnbull Rivers in Mount Aspiring National Park. There are also tramping opportunities on the western end of the Marks and Selbourne Range included within this area. For instance Moir's North: the Otago Southern Alps, edited by Danilo Hegg and Geoff Spearpoint, describe tramping routes onto both ranges within this parcel that lead into Mount Aspiring National Park.