

4 December 2025

Horizons Regional Council
Palmerston North 4442
Emailed to: consent.submissions@horizons.govt.nz

Winstone Pulp International Limited
Emailed to: mike.ryan@wpinz.com



Federated Mountain Clubs of New Zealand Inc.
Submission on resource consent application to discharge
treated pulp mill wastewater, stormwater and a foam inhibitor
to the Whangaehu River

Tēnā koe,

Thank you for the opportunity to submit on the Winstone Pulp International Limited resource consent application APP-2006012018.02 to enable the discharges into the Whangaehu River (the consent).

Federated Mountain Clubs of New Zealand Inc. (FMC) was founded in 1931 to, amongst other things, promote outdoor recreation in our outdoors and to preserve our backcountry for non-commercial outdoor recreation. We continue to advocate for New Zealand's backcountry and outdoor recreation on behalf of over 22,000 members comprising 118 clubs, organisations and schools, and over 1,000 individual supporters. We also speak for the large number of other New Zealanders who also enjoy outdoor recreation seeking beauty, spiritual enjoyment, challenges and friendship.

FMC opposes the consent. Our reasons are outlined below.

1. The river is of significant recreational value for whitewater paddlers.
 - a. The Whangaehu river is a well-known section of Grade 3 whitewater which is frequented by paddlers. It would be considered regionally significant in terms of recreational whitewater use. It features in multiple guidebooks, and is also featured on Whitewater New Zealand's online River Guide¹ and on Packrafting Trips NZ²
 - b. Whitewater paddling will often result in participants being immersed in the river, including their head going underwater. "Swims" or "rolls" generally happen with little notice, so it is not unusual for a paddler to consume river water when this happens.
 - c. The "put in" for paddlers is approximately 10km downstream from the discharge point. There are no significant tributaries between the discharge point and the put-in point.

- d. We conclude that paddlers may be subject to increased health risks from the discharge. Furthermore, there is a significant “ick” factor in the knowledge that people would be recreating in waste discharge.
- 2. The unique nature of the river
 - a. The Whangaehu river flows from the crater lake on Mount Ruapehu. It is the only river in New Zealand that flows from a volcanic lake all the way to the ocean and this makes it a unique and coveted river for paddlers.
- 3. Environmental concerns
 - a. The Whangaehu river ecological systems are already under pressure from adjoining land use and runoff. We have significant concerns around the impact the approval of this consent would have on further degradation of the river and its ecological systems.
- 4. We understand that Ngati Rangi have opposed the consent. It is not our place to comment on matters relating to the cultural significance of the river, but we support their submission.

Nāku, nā,



Megan Dimozantos
President
Federated Mountain Clubs of New Zealand