

To: Rt Hon Christopher Luxon, Hon Tama Potaka, Hon Chris Bishop, Hon Louise Upston, and Hon Maureen Pugh

CC: the Waitaha Hydro Expert Panel

14 April 2026

Tēnā koutou katoa.

We write as people and organisations who love nature and wild places, who tramp, paddle, study and fight for them. Together, we ask you to permanently protect the wild and scenic Waitaha River. We urge the Waitaha Hydro Expert Panel to receive and consider all available information regarding the impacts of the Waitaha Hydro scheme on the Waitaha River, to reconsider their draft decision and to decline the scheme.

The Waitaha River is one of the last places in Aotearoa New Zealand where you can still experience a truly wild river gorge. The gorge walk, the hot pools, the paddling runs, the habitat all depend on a river that runs as nature made it. By leaving as little as 3.5 cubic metres per second in Morgan Gorge, the scheme will reduce that river to a residue.

We understand the urgency of New Zealand's energy transition. But not every place is appropriate for development, and the Waitaha is one of those places.

A 23-megawatt power station generating electricity for around 12,000 homes is a real and worthwhile benefit. But it is not a benefit so overwhelming that it justifies permanent, significant, unmitigated harm to one of the South Island's finest wild river gorges and the recreational and ecological values it holds. Especially as there are other places with lower conservation values that are already consented for hydro schemes.

The Waitaha catchment contains complete and intact altitudinal ecological sequences including forest patterns, geology, soils, and rainfall gradients from its lowlands to the high alpine zone. By virtue of its intactness, the catchment provides undisturbed habitat for many at-risk and threatened native animals, including the nationally critical long tailed bat/Pekapeka-tou-roa and the nationally vulnerable blue duck/whio. It is the undisturbed 'wholeness' that means fragmenting the Waitaha's ecological values would have such a large impact.

These impacts were previously deemed unacceptable when the project was declined in 2019 by the then Minister for the Environment, David Parker, to whom the Minister of Conservation had transferred decision making powers. The key reasons for the then Minister's decision were the project's severe and permanent damage to the conservation values including the intrinsic values of the Waitaha River, which according to the Conservation Act 1987, are to be maintained¹.

¹ [Hydro scheme concession application by Westpower Limited](#)

In June 2017, the chair of the then hearing panel which considered more than 3,000 public submissions on the previous application, recommended that the Minister “*decline the application on the bases that it is inconsistent with the purposes for which the land is held and the provisions of the Act (s 17U(3)), and that there are adverse effects on landscape, visual amenity, natural character and recreational kayaking and tramping that cannot be reasonably or adequately avoided, remedied or mitigated.*”²

We believe there would be similar public opposition today.

The Panel's own findings demand a different outcome

The recent draft decision acknowledges that effects on Morgan Gorge and Kiwi Flat will remain "high" (significant) even once all the mitigation measures are applied (page 15 of the draft decision). This is not a claim made by opponents of the scheme, but was stated by the applicant and acknowledged by the Panel.

The Panel has decided that these significant effects are localised. We respectfully and firmly disagree with that conclusion. Significant and permanent harm to a wild river gorge on public conservation land is precisely the kind of outcome that should be prevented. Section 85 of the Fast Track Approvals Act 2024 asks whether adverse effects are sufficiently significant to be out of proportion with the regional benefits provided. We say they are.

The public was excluded from decisions that affect them

Every year the Waitaha Valley is visited by trampers, paddlers, canyoneers, hunters, photographers, and people who simply want to experience wild nature. Under the fast-track process, none of them had the right to be heard.

The Department of Conservation formally requested that the Federated Mountain Clubs of New Zealand be invited to provide comment, stating that it could not speak to the first-hand experience of recreational users. That request was refused.

The applicant's recreation assessment did not consider any changes since the scheme was rejected in 2019, most notably the recognition of the Waitaha as a world class canyoning site. The author did not talk to canyoneers at all. And the 'independent' peer review of the assessment included pre-dated it by ten years³. None of this was cured by the Panel-appointed peer-reviewer, who repeated factual inaccuracies and also talked with no-one.

The result is a recreation assessment built almost entirely on evidence commissioned and provided by the applicant. This is despite FMC noting that it contained factual inaccuracies - notably and objectively misstating the legal rights of access to the valley.

² [Westpower Ltd - Waitaha Concession Decision Report](#) at para 4.

³ [Waitaha Hydro Westpower - recreation assessment](#) page 102

A truly independent peer review of the applicant's recreation assessment, prepared by Dr Shayne Galloway, was excluded entirely and the Panel's own recreation expert was instructed not to read it.

The ecological and geological risks are real and unresolved

The Panel has acknowledged that who live in the Morgan Gorge. As you know, who are entirely dependent on the kind of undisturbed, swift-flowing, boulder-strewn river habitat that the Gorge provides. The proposed Hydro scheme will fragment and permanently degrade that habitat and industrialise an otherwise intact wild and natural ecosystem.

The Waitaha sits in one of the most tectonically active catchments in the Southern Hemisphere, with the Alpine Fault located just 3 km from the project site. Earth Science NZ have calculated that the probability of a M8 + earthquake occurring on the Alpine Fault is 75% in the next 50 years. The Panel's own independent geomorphologist has raised sufficient concerns to require a full expert empanelment five months into the process. The risks of getting this wrong are not abstract.

Questions about sediment transport, the long-term effects of the desander on downstream gravel supply, and the adequacy of the minimum flow were still being worked through in February 2026. Clearly these questions have not been adequately resolved.

What we ask

We believe the permanent and unmitigated effects on recreational and ecological values in Morgan Gorge and Kiwi Flat are significant, especially in an area of public conservation land and on a wild river of national importance.

We ask you all to protect the wild and scenic Waitaha River so that it can continue to flow freely and for the enjoyment of this generation and generations to come.

Signed by the following organisations and individuals:



Megan Dimozantos
President
Federated Mountain Clubs of New Zealand



Erika Toleman
Acting Chief Executive



Forest & Bird



Dr Russell Norman
Executive Director
Greenpeace Aotearoa New Zealand



Dan Clearwater
President
NZ Canyoning Association



Linda Grammer
Secretary
Buller Tramping Club



Kev England
Past President, Whitewater NZ.

For more information please contact Megan Dimozantos, President Federated Mountain Clubs of New Zealand. Email megan.dimozantos@fmc.org.nz or phone 021 804 044.