

13 August 2026

Applicant:

Winstone Pulp International
c/- Babbage Consultants Limited
PO Box 2027,
Shortland Street, Auckland 1140
Attention: Sukhi Singh
Email: sukhi.singh@babbage.co.nz



Regulatory Authority:

Manawatū - Whanganui Regional Council
Private Bag 11025
Palmerston North 4442
Email: consent.submissions@horizons.govt.nz

Federated Mountain Clubs of New Zealand Inc.
Submission on Resource Consent Application No.
APP-2006012018.03 – Winstone Pulp International Limited

Tēnā koutou

Thank you for the opportunity to submit on the above-mentioned consent application to enable discharge 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 23,000 members comprising 90 clubs 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 is making a **neutral** submission on the consent. Our reasons are outlined below.

1. The current application represents a level and type of discharge that is likely to have a negligible impact on recreational activity, specifically, whitewater paddling.
 - 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 Guide and on Packrafting Trips NZ
 - 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.
 - d. While the previous consent application proposed discharge to the river that we considered may be harmful for the health of people utilising the river for recreation, the current application, impressively, has reduced discharge levels to less than 20% of the original application. We also note that both applications did not seek to use anti-foaming agent,

which has been a known source of eye irritation in paddlers using the river. The current application also commits to wetland treatment of the waste.

- e. We conclude that paddlers are unlikely to be subject to increased health risks from the discharge.

2. Applicant engagement

- a. We have been impressed by the level of engagement we have received directly from the applicant and their environmental advisors. It has not gone unnoticed that the applicant has clearly listened to feedback and produced a significantly amended application, chosen to publicly notify their amended application, and that the CEO has personally fronted at a meeting with us to discuss the application. This sort of corporate responsibility is to be commended.

While it would always be our preference for rivers to run from source to sea with no waste discharge at all, we are pragmatic that granting this consent will also have positive societal impacts for the local region, and given the negligible impact to river users, it would be unreasonable to oppose the application taking all the above into consideration. For this reason, FMC's submission on the consent is **neutral**.

Ngā mihi,



Megan Dimozantos
Immediate Past President
Federated Mountain Clubs of New Zealand



Allan Brent
President
Federated Mountain Clubs of New Zealand