



5 October 2026

By email: landexchange@doc.govt.nz

Re: Tukituki Water Security Project Land Exchange Application (FTAA-2603-L003) - Comments on Draft Report and Proposed Conditions

Dear The Director General of Conservation [Peter Chrisp],

We submit on the draft land exchange report for the Tukituki Water Security Project and in particular the draft conclusions contained in paragraphs 290-302.

We support the technical findings and overall direction of the draft conclusions. In our view, the assessments undertaken for the application demonstrate that the proposed exchange does not satisfy the statutory requirement that the exchange enhance conservation values and promote the purposes of the Conservation Act 1987.

While the report identifies potential gains in terrestrial biodiversity under the reservoir scenario, it also concludes that freshwater values are not enhanced, that practical public access remains problematic, that recreational benefits are uncertain, and that significant values associated with the existing conservation land would be lost. Those findings are consistent with the evidence before the Panel and are supported by the submissions and specialist assessments.

Accordingly, our primary position is that the exchange should not be approved, because the information before the decision-makers does not establish that the exchange will enhance conservation values of land managed by the Department as required by section 16A of the Conservation Act 1987. Section 16A permits an exchange only where the Minister is satisfied that the exchange will enhance conservation values and promote the purposes of the Act.

The statutory test is one of enhancement, not mitigation, substitution or compensation. The evidence identifies ongoing losses associated with freshwater ecosystems, access, wild river recreational experiences, fisheries values and river character. In our view, those losses are not offset by the acquisition of the proposed replacement land.

Conclusion

For the reasons set out above, we support the draft conclusions in paragraphs 290-302.

Those conclusions accurately identify that the proposal does not demonstrate enhancement of freshwater conservation values and does not adequately address access and recreational losses. As a consequence, we submit that the land exchange application should be declined because the statutory enhancement test under section 16A of the Conservation Act 1987 has not been met.

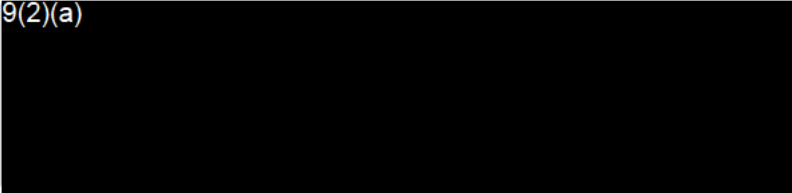
Yours sincerely,

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on behalf of
Richie Cosgrove, COO
New Zealand Fish and Game Council

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Bruce Bates
Chair Hawkes Bay Fish and Game

Contact Details

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