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Sent: Monday, 5 October 2026 7:37 pm
To: Land Exchange <landexchange@doc.govt.nz>
Subject: Tukituki Water Security Ltd's Application

Early on when reading the Draft Report , I was encouraged to feel confident that the Expert Panel would have no problem dismissing this application :

Paragraph 29 - The Panel cannot approve a land exchange unless satisfied that the exchange will enhance the Conservation values of the conservation areas.....

P31(iii) - an explanation of why the exchange would benefit the conservation estate...

P36 - any positive....impacts of inundated.....

P37 - The land that is lost through the exchange will be underwater , so the future values are likely to be negligible

P38 - allows the identification of....where the land exchange will result in a net gain , net loss , or no change in conservation values

P47 - Wildlands (for DOC) identified the DOC-Give land as predominantly in Acutely and Chronically Threatened land environments , while most of the DOC-Get lands indigenous vegetation sits in the ' less reduced and better protected' category

P49 - No management actions are proposed by the applicant to return [45 ha. of grazed pasture and rank grass (being of negligible ecological value/ an ongoing management liability for DOC)] to indigenous cover

Etc

But then , observations like the following started appearing :

P59 - Wildlands' assessment [of terrestrial biodiversity values] finds [SLR's] (on behalf of the applicants) overall assessment appears to be generally accurate for most ecological attributes - based on the limited data available it is likely that the overall conservation values of Crown owned land will be enhanced

P76 - Wildlands' overall assessment of aquatic values in DOC-get streams is.....MODERATE

P134 - Mr Head (for DOC) the proposal would provide an enhancement of conservation values for terrestrial biodiversity, culture and heritage and recreation

P138 - Mr Nestor (also for DOC) a net gain in cultural and heritage values

Wow !! How did they get there ?

Luckily , the "pendulum" swung back in what I consider to be the right direction with other observations like :

P79 - Wildlands finds a net reduction in wetland extent in the DOC-Get land

P80 - Wildlands finds the exchange is not expected to result in a net enhancement of aquatic and wetland conservation values

P137 - a repeat of P80

P140 - further information [is needed] on effects to wahi tape, pa sites, urupa and other taongo tuku iho

P142 - Mr Head finds the proposed land exchange would result in a net loss of landscape value

Then come the summary recommendations from DOC (a real mixed "bag") :

P292 - the proposal would provide enhancement in terrestrial biodiversity , cultural and heritage and recreational values - apparently accepting Mr Head and Mr Nester's opinions over countless others of the opposite opinions

Further on in P292 , ... but [the proposal] would not provide a net enhancement for freshwater values or landscape values

P294 - the exchange is not expected to result in a net enhancement of aquatic or wetland conservation values

P299 - The practical consequences of the exchange include ongoing management responsibilities without appropriately resourced management actions parts of the DOC-Get land could become an ongoing liability for the Department

SUMMARY

As is obvious from my previous submissions and from this email , I am opposed to this application (to destroy the Makaroro River , create a massive industrial reservoir , and enable the further degradation of our waterways) .

I also disagree with the applicant's claim in Paragraph 19 that the proposed improvements to the DOC-Get land will in any way, mitigate the destruction they plan to unleash.

In P20 , they talk of long term pest and plant control but then propose to pass the responsibility on to DOC as fast as they can

In P66 , the SLR report (on behalf of the applicant) states shortfin and longfin [eelings] will be regularly trapped and transferred across the dam . Will it be TWSP or DOC who pay for this stupidity on a long-term basis - the trout who survive the drastically high

rise and fall of the water level will grow big and fat on those eelings. And elsewhere in the Draft (around there) , it stated the mature eels would not be able to migrate downstream so what would be the point of the proposed trap and transfer ?

I trust the Panel will agree with me that there is no way this proposed land exchange should proceed.

Thanks for the opportunity for me to comment on the Draft Report.

Gerard Pain , CHB