

Submission on: Department of Conservation (DOC) Discussion Document Modernising conservation land management

Submitted by:

Nature and Climate Group of the Nelson Tasman Climate Forum

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Introduction

The Nelson Tasman Climate Forum (NTCF) is a community led initiative that aims to weave the Nelson Tasman communities together around urgent, strategic action on climate change. The Nature and Climate Group has a particular focus on the impacts of climate change on biodiversity and ecosystems.

Executive Summary

The NTCF agrees there is a need to modernise and streamline the conservation management planning system. However, the proposals in the discussion document lack sufficient detail, checks and balances to ensure that conservation values are protected. In particular, there needs to be integration of climate change considerations into all decision-making as well as statutory recognition of DOC's Climate Change Adaptation Action Plan.

Issues

Creating Clarity and Guidance

The conservation estate is a taonga to be protected for future New Zealand (NZ) generations. The discussion document attempts to provide a balance of conservation, recreation and economic benefits. However, there is insufficient detail in the document to provide confidence that conservation benefits would be maintained. It is important that there are enough checks and balances to address the risks associated with streamlining and simplifying the management system.

We support the recommendations of the Environment Defence Society (EDS) to:

- Set clearer purposes and priorities in the conservation system to support planning and decision-making. This would provide greater transparency and understanding of how this new management system would work.

Climate Change

As noted in the Ministry of Environment's report *Our Atmosphere and Climate 2023*, climate change is causing a shift in the habitat range of some species and a change in the time of some biological events. This alters ecosystem structures and exacerbates the impacts of invasive species and land-use changes. Without careful consideration of climate change impacts, the conservation value of Protected Conservation Land (PCL) is likely to be undervalued.

We support the EDS recommendations to:

- Use a strong evidence-based approach and strengthen advisory and oversight mechanisms, including the role of the NZ Conservation Authority.

- Integrate climate change considerations into all decision-making and provide statutory recognition for DOC's Climate Change Adaptation Action Plan.

A changing climate also requires rapid knowledge adaptation and a flexibility to be able to respond quickly to new challenges. For this reason, we recommend:

- Long-term concessions are not included in the exempt class as conditions may change in the future.

Land Exchange

The goal of land exchanges is to improve *conservation* outcomes by permanent protection of areas that meet the statutory requirement. It is hard to understand that there could be any land "surplus to conservation needs" given the vulnerable nature of much of the country's biodiversity.

- If changes to existing land exchange mechanisms are progressed, clear criteria and a robust public consultation process would need to be put in place.
- Criteria would need to include climate change impacts on the value of the PCL and protection of vulnerable biodiversity and ecosystems.
- As noted by the EDS, any significant land exchanges need to deliver a *significant*, rather than a net conservation benefit. Otherwise, there is a risk that commercial values would take precedence over conservation values.
- All conservation values must be included in any consideration of land exchanges, for example a hectare of mature vegetation provides far greater conservation value than a hectare of newly planted vegetation of equivalent species.
- In addition, the carbon stocks and sequestration (actual and potential) of land needs to be evaluated in any consideration of land exchanges.
- Changes to the land exchanges regime must continue to give effect to iwi rights of first refusal and take into account potential future settlements.

Engagement

Engagement processes with iwi and hapū must remain flexible to the needs and capacity of individual rūpu and should not be altered without engagement with those affected.

Setting timeframes for Treaty partners to provide their views on concessions could lock many iwi and hapū out of engagement. It is not clear how this proposal would enable DOC to meet its Treaty obligations under section 4 of the Conservation Act.

The public also has a right to be kept informed of significant processes. We recommend that:

- Any establishment of amenities areas, land exchange or land disposal needs to be undertaken in an open, transparent process.

Concluding Remarks

We are the kaitiaki of our environment and any decisions undertaken about public conservation land need to ensure that it is well-protected into the future. We appreciate the opportunity to provide feedback, and hope future policies will improve the mechanisms to protect the conservation benefits of PCL.