

Conservation Amendment Bill 2026

Submitted by:

Nature and Climate Group of the Nelson Tasman Climate Forum

2nd July 2026

We wish to speak to our submission, at place.

Introduction

Thank you for the opportunity to provide a submission on the Conservation Amendment Bill for your consideration. Details of those preparing this submission can be found at the end of this document.

Our Concerns

We strongly oppose the Conservation Amendment Bill (the Bill). In particular, we have grave concerns with three aspects of the Bill:

1. the significant paradigm shift in the purpose of the Bill from conservation to conservation **and** economic development, thereby changing the fundamental function of the Department of Conservation (DOC);
2. the transfer of power from the New Zealand Conservation Authority (NZCA) and Conservation Boards to the Director General of DOC and the Minister of Conservation;
3. the erosion of the democratic right for the public to have input into key aspects of DOC activities, such as granting concessions and the development of policies, strategies and plans.

Show Me the Money

One of the most concerning aspects of the proposed changes in the Bill relates to the paradigm shift from a single focus on **conservation** as priority, to balancing conservation and economic outcomes.

As defined in the 1987 Conservation Act “**conservation** means the **preservation and protection** of natural and historic **resources for the purpose of maintaining their intrinsic values**, providing for their appreciation and recreational **enjoyment by the public**, and **safeguarding the options of future generations**”. Conservation does **not** mean developing resources for short-term economic gain.

One Minister of the Crown recently stated that “It is ridiculous to assert that on 33% of the land there should be no economic activity - we cannot afford this luddite thinking.” Such flawed reasoning assumes that the conservation estate contributes nothing to the economy, and that economic development is the only metric by which economic return can be demonstrated.

It assumes that our PCL does not already do a ton of heavy lifting for the economy. Au contraire:

- without our PCL, our tourism industry would falter.
- without our PCL, our ability to generate electricity from hydroelectric power stations would decline dramatically, leaving our energy supply in disarray.
- without our PCL, our hydrological systems, embodied in lakes, rivers, and wetlands, would collapse, endangering our water supplies for human use, agriculture and industry; and our land would be at much greater risk of catastrophic floods and droughts.
- without our PCL, our ability to sequester carbon would be significantly lower, exacerbating the climate crisis.
- without our PCL, our opportunities for a myriad of recreational activities would be greatly diminished, impacting the overall resilience, physical and mental health of the community.

These are just some of the ecosystem services that healthy conservation land provides to the New Zealand economy.

As described in Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy (2020) “nature is at the heart of our economy... Protecting and restoring nature will have direct benefits for our economic wellbeing and prosperity. Our international brand and domestic tourism, our resilience to climate change, the health of our fisheries, forests and productive soils – these are all dependent on the ecosystem services provided by healthy nature. There are also cultural, social and human health benefits that need to be recognised and considered as part of the value of nature.”

The fiscal tools used to measure the value of ecosystem services can provide estimates only. Despite this, attempts have been made to quantify the economic value of both the services that relate to “use”: provisioning (e.g., food, fibre, water), regulating (e.g., climate regulation, flood mitigation), cultural (e.g., physical and mental health) and supporting (e.g., nutrient cycling and soil formation); and passive values that relate not to actual use but to the intrinsic value of the ecosystem itself.

A 2013 paper by Patterson and Cole¹ estimated the value of a range of ecosystems in New Zealand, ranging from horticulture and agriculture ecosystems to national parks, rivers, lakes and wetlands. Their analyses found (in 2012 dollars):

- ~ 6 million ha of **PCL** (~70% of the total) provided more than **\$9 bn** in passive values;
- rivers, lakes and wetlands provided \$2 bn in passive values;
- forest ecosystems provided up to \$7 bn of “use” ecosystem services;
- rivers, lakes and wetlands provided ~\$17 bn of “use” ecosystem services.

A 2024 review (NZIER³) estimated the value of “use” ecosystem services on **PCL**, finding these services provide **\$11 bn** (net) of value to the economy, per annum. The total value of the natural and built asset stocks on PCL is worth \$134 bn, with built assets contributing less than 0.1% of that value.

We acknowledge that not all this economic value is generated on PCL, but without healthy PCL, much of the economic value would not be generated by these ecosystems. For example, the headwaters of many of the rivers that provide economic value through electricity generation, irrigation and water supply for public and industrial use, arise on our PCL. The health of these rivers is critical to our economy, to our primary industries, and to our overall health and wellbeing. The health of these rivers is dependent on healthy landscapes, provided to no small extent by PCL.

In terms of carbon sequestration, a 2025 study by Bukosa *et al.*² found that across Aotearoa New Zealand, land-based ecosystems are sequestering about 171 m tonnes of CO₂ per annum. Taking a very conservative approach and assuming PCL contributes about 33% of that **carbon sequestration**, then PCL is potentially sequestering ~57 m tonnes of CO₂ per annum. At \$50 per tonne CO₂, that equates to **~\$3 bn per annum**. And with effective herbivore control, our PCL could sequester even more carbon!

Taking these estimates in account, it is obvious that our **PCL** already contributes **tens of billions of dollars to our economy every year**. It needs to be recognised that PCL is inextricably entwined with our economic system already, as integral to the health of our economy as it is to our own health.

Healthy PCL is critical to maintaining the integrity of all of our ecosystems, both on PCL and elsewhere, on which we rely for our economy, our health and well-being.

And unless our PCL is healthy, it cannot provide these ecosystem services. We should be focusing our efforts on improving ecosystem health in our PCL, for example by reducing invasive species, reducing fragmentation and increasing landscape connectivity, protecting and restoring ecosystems.

It is a fallacy to think, as stated on page 1 of the Explanatory Note of the Bill, that “development is an acceptable activity on conservation land”. It is not. Our PCL is inevitably degraded by development.

It is impossible to undertake development on any PCL without having a negative impact on flora, fauna, soil and ecosystems, however minor and localised the impacts may be. With a primary focus on conservation, our management of PCL must **limit any development** to that which is **essential** for undertaking conservation management and visitor management.

In a country where humans are a very recent addition to the biota, ecosystems function best in the complete absence of human development.

PCL is set aside from remaining land for the purpose of **conservation** – it’s in the name! Not for the purpose of development or economic exploitation. “A fresh wave of concessions – like tourism, agriculture, and infrastructure” to “unleash economic growth on conservation land” (Government press release, 2/7/25) is completely at odds with the **fundamental principles of conservation** – conserving the natural environment in its natural state.

Conserving the natural flow of our rivers so whio can flourish, as they are now doing again in and around Kahurangi National Park, thanks to the conservation mahi of land-holders and volunteers in association with DOC. Conserving our forests and wetlands so the brilliant scarlet of rata flowers and the delicate pink of makomako flowers and architectural heads of toetoe flowers can delight us and feed the tui and the korimako, whose songs refresh our souls. It is the towering tōtara and kauri, the call of the ruru and kiwi, the delicacy of the tiniest fern and moss that we value, that we need in order to be healthy and whole. Not another hotel or paddock grazed by sheep or helicopter pad – there are enough of those elsewhere.

Public not Political

PCL is **Public** conservation land, vested in perpetuity in DOC to be managed for the overall good of the public, through the conservation of ecosystems and species.

It is not land that has been set aside to be managed at the whim of political processes, driven by the short-term vacillations of the political cycle. By its very nature, management of PCL must take a long-term approach. It is critical to the health of our PCL that its management is **not** subjected to three yearly election cycles, but managed completely independently of them.

The current Act recognises that PCL can potentially be at risk from political interference. In recognition of this, the Act vests powers in politically independent bodies – the New Zealand Conservation Authority and the Conservation Boards. These bodies are made up of experts in various disciplines from across the country, and local community and iwi stakeholders. They provide expert advice and guidance to DOC and the Minister, local guidance on PCL management, and approving authority for conservation management strategies and plans. In doing so, they currently provide important checks and balances on the over-reach of political power by the Minister.

The current Bill seeks to diminish the powers of these bodies and transfer those powers, including approving authority, to the Minister. This is a dangerous precedent, risking significant political interference into the management of our PCL. Given the lessons of history, it is highly unlikely that

increasing Ministerial power over management of PCL will result in better outcomes for the ecosystems and species found within our PCL.

We do not support the proposed changes to the functions of the NZCA and Conservation Boards as currently proposed by the Bill.

Democracy in Action

As noted above, PCL is **public** land. We value this 33% of land that is vested in public ownership. We are owners, custodians, guardians, kaitiaki of this land. This land belongs to all of us, with much of it gifted to us or bought using public funds. It is our land. It does not belong to politicians or ministers.

Many of us contribute significant time and resources to assisting DOC with conservation management on PCL. The local example of “Friends of Flora” volunteer group who have achieved huge gains in predator control in Kahurangi National Park, resulting in significant improvements in biodiversity outcomes, is an inspiration to all.

We care about our local areas of PCL and contribute to their management through involvement with Conservation Boards and responding to public consultation processes for the granting of concessions and the development of policies, strategies and plans. The ability to make these contributions is our democratic right as owners of PCL.

In its current form, the Bill will erode these rights:

- the Bill removes the right of submitters to be heard on their submission on publicly notified concession applications, instead giving the Minister the discretion to hear from some submitters but not others: inequitable and undemocratic;
- the Bill removes the requirement to hold public hearings before making conservation policies, strategies and plans, instead giving the Minister the discretion to hear from some submitters but not others: inequitable and undemocratic;
- the Bill includes provision for new visitor amenity areas and includes the requirement for public consultation of such areas, however there would be no requirement to hold a hearing on proposed areas, instead giving the Minister the discretion to hear from some submitters but not others: inequitable and undemocratic.

The gravity of our concern about these proposed limitations on our democratic right to contribute to the management of PCL has been deepened by the erosion of our trust in the government’s approach to managing PCL and the wider environment. Bill after Bill has sought to loosen environmental constraints on the management of our natural resources and instead prioritised short-term economic gain over the long-term wealth generated by a healthy environment.

This trust has been lost at a time when we need to pull together as a nation to protect, restore and conserve our natural resources to address the twin crises of climate change and biodiversity loss. Crises which threaten our economy and our way of life. We cannot afford to prioritise short-term economic gain when it threatens the long-term health and well-being of Papatūānuku, on which we are wholly dependent for our own health and well-being.

Healthy, flourishing, undeveloped PCL underpins our health and our wealth. Hands off!

NB:

- 1) Although the Minister of Conservation has announced that the component of the current Bill relating to the transfer and disposal of PCL will be removed from the Bill, we wish to note that we are firmly opposed to the changes that had been proposed relating to the transfer and disposal of PCL as completely inappropriate, with the potential to set a dangerous precedent for future governments.
- 2) As of this morning (2nd July 2026), we have been advised that the deadline for submitting on the Bill has been extended from today to 13th July 2026, in response to public concerns about the Bill. While we appreciate the revision of the submission deadline, we view it as another indication that the government does not understand the value of PCL to the people of Aotearoa New Zealand, who have no interest in opening up our precious conservation estate to miners, farmers or hoteliers and the like. The government appears to be developing new legislation without adequate forethought and understanding, rushing the process, which results in back-tracks (see note 1 above) and changes in timelines. Such sloppy governance does not bode well our democratic processes, nor for our environment.

Conclusion

Our PCL is fundamental to our health and well-being, at all levels. We must ensure that management of PCL is adequately resourced, is undertaken to the highest ecological standards, is free of political interference to maximise long-term outcomes, and prioritises the health of ecosystems and species.

The current Bill does none of these things, instead it imperils the long-term conservation of the ecosystems and species found within our PCL.

We cannot support this Bill and require that it be withdrawn immediately.

References

¹Patterson M.G., Cole A.O. 2013. "Total economic value" of New Zealand's land-based ecosystems and their services. *In* Dymond JR ed. Ecosystem services in New Zealand – conditions and trends. Manaaki Whenua Press, Lincoln, New Zealand. Pp: 496 – 510.

²Bukosa, B., Mikaloff-Fletcher, S., Brailsford, G., Smale, D., Keller, E. D., Baisden, W. T., Kirschbaum, M. U. F., Giltrap, D. L., Liang, L., Moore, S., Moss, R., Nichol, S., Turnbull, J., Geddes, A., Kennett, D., Hidy, D., Barcza, Z., Schipper, L. A., Wall, A. M., Nakaoka, S.-I., Mukai, H., and Brandon, A. 2025. Inverse modelling of New Zealand's carbon dioxide balance estimates a larger than expected carbon sink. *Atmos. Chem. Phys.*, 25, 6445–6473, <https://doi.org/10.5194/acp-25-6445-2025>, 2025.

³NZIER. 2024. The value of public conservation land. A report to the Department of Conservation. 58 pp.

Nature and Climate Group, Nelson Tasman Climate Forum

This submission has been prepared by members of the Nature and Climate Group of the Nelson Tasman Climate Forum. Our diverse group of experts and practitioners work to promote the conservation of our precious indigenous species and ecosystems across our rohe.

With a deep understanding of the twin, interlinked crises of climate change and biodiversity loss that result from past and ongoing degradation of the natural environment, we seek to educate, empower and encourage local communities, Councils and the wider populace to address these crises for the long-term benefit of all.