



Nelson Tasman Climate Forum

Submission on National Conservation Policy Statement 2026

Prepared by NTCF Nature and Climate Group

24 August 2026



Summary and Recommendations

1. We consider it imperative that the National Conservation Policy Statement (NCPS) focuses on **CONSERVATION** and not, as the current consultation document proposes, on management planning and concessions and enabling economic development. Accordingly, our submission substantively addresses conservation and related matters.
2. We cautiously welcome the Minister of Conservation's stated intention to clarify proposed new Section 6(ea) of the Conservation Amendment Bill (and by implication, the purpose of the NCPS and of area plans) to ensure 'strong and enduring conservation outcomes while ... enabling tourism and other economic activities...'.
3. We describe conservation matters that critically need to be addressed in the NCPS. This coverage is intended to convey gravity and scope but is not exhaustive.
4. Specific **recommendations** include that:
 - (a) the definition of 'natural resource' in the NCPS should embrace a broader characterisation of natural resources, including Nature having intrinsic value independent of any utility, and recognising Te Taiao in te ao Māori, the natural world that contains and surrounds us, and Papatūānuku who embraces and sustains us
 - (b) the NCPS include a protocol to manage carrying capacity limits and cumulative effects
 - (c) the meaning of 'significant' be explicitly defined in the NCPS
 - (d) the NCPS provide that DOC publicly engage when determining area plan boundaries
 - (e) DOC compile and publish detailed descriptions of the indigenous species habitats, ecosystems, values, threats and pressures etc. of an area, as the basis for summaries in area plans, with transparent referencing to the detailed data so it can be easily accessed
 - (f) if drone use is to remain pre-approved, the proposed conditions be subject to expert review
 - (g) large tourism facilities, hydroelectric development and cropping be deleted as activities with standardised pre-assessment as they are inappropriate activities on public conservation lands and waters.
5. We wish to record our view that the Treaty should be central to our conservation system, and the government needs to ensure that it upholds its obligations as a Treaty partner.
6. We consider an NCPS based on the current consultation document needs major amendments for it to be fit for purpose, and to be consistent with foreshadowed amendments to the Conservation Amendment Bill when enacted (exchange and disposal provisions, economic use in relation to conservation). We do not see opportunity for further public input. We further **strongly recommend** a draft NCPS be offered for further public consultation once the Bill is enacted.

1. Introduction

1. Thank you for the opportunity to provide a submission on the National Conservation Policy Statement (NCPS) for your consideration, and for granting us an extension on the submission deadline.
2. The Nature and Climate Group of the Nelson Tasman Climate Forum¹ is comprised of a diverse group of experts and practitioners who 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, government and the wider populace to address these crises for the long-term benefit of all.

2. Scope of our Submission

3. The consultation document notes (p. 3) that it ‘has been prepared for consultation to support the Conservation Amendment Bill ... [and it] describes the policy decisions taken by the Government in relation to the content of the first National Conservation Policy Statement (NCPS). It should be considered alongside the Bill and associated materials.’ It further notes: ‘we are specifically **not** seeking feedback on matters relating to the wider Bill’.
4. The Minister of Conservation subsequently advised² the Environment Select Committee considering the Bill that the Government is making two major changes: i. deletion of the Bill’s provisions that relate to land exchange and disposals, and ii. ensuring that new Section 6(ea) and its surrounding provisions support strong and enduring conservation outcomes while at the same time enabling tourism and other economic activities, and access charging. We cautiously welcome these shifts.
5. The NCPS consultation document currently has a major focus on economic aspects (12 out of 16 questions), consistent with the policy directions of the Bill as introduced. We consider it imperative that this NCPS focus be shifted to recognise that conservation is the overarching purpose. Accordingly, our submission substantively addresses conservation and related matters.
6. We express our gratitude to Associate Professor Valentina Dinica, on whose work we have drawn. We commend her wide-ranging input into the Bill for further study in relation to the NCPS.³

¹ [The Nelson Tasman Climate Forum: about us.](#)

² Environment Select Committee 2026. [Submissions extended for the Conservation Amendment Bill.](#)

³ E.g. Valentina Dinica, V. 2026. [Submission to the Environment Committee: Conservation Amendment Bill 2026.](#)

3. Scope and Architecture of Proposed NCPS

7. We welcome, in principle, an updated and streamlined conservation planning and concessions management framework. A national framework can improve consistency and efficiency. The goal here must be to invest more time and resources into preserving and protecting our Te Taiao, rather than promoting commercial use.
8. We have grave concern, however, over the extremely superficial treatment of biodiversity, ecosystems, climate change and conservation principles; more so because new section 13D of the Bill states the first purpose of the NCPS is to ‘set policy relating to the Acts listed in new section 13A(2)’
9. The proposed NCPS is completely lacking in national policies on applying best practice conservation. And on best practice management of invasive species. And on managing both indigenous and invasive biodiversity in a rapidly changing climate. Marine parks, areas of freshwater and wetlands, alpine ecosystems, and other key ecosystems that require urgent and appropriate conservation are not mentioned. The word ‘biodiversity’ is used just three times, climate not once. Indeed, it is silent on anything significant relating to actual **CONSERVATION!**
10. A fit-for-purpose NCPS must have its primary focus on the conservation of Aotearoa’s unique biodiversity and ecosystems in the context of a rapidly changing climate, to ensure that indigenous ecosystems and species are thriving. The NCPS needs to have a **Conservation Strategy**; an overarching strategy to guide **conservation**. How can DOC do conservation without a strategy to develop objectives and guide actions?
11. The perceived need for speed (Overview, p.5) should not override the fundamental requirement of any modernising to ensure that the greatest possible conservation outcomes are front and centre of the process.
12. The NCPS needs to recognise the conservation principles in Aotearoa New Zealand’s commitment - as a Party to the United Nations Convention on Biological Diversity (CBD) - to give effect to targets under the 2022 Kunming–Montreal Global Biodiversity Framework⁴. Target 3 calls on Parties to contribute by 2030 to the protection and effective conservation and management of at least 30% of terrestrial, inland-water, coastal and marine areas, **especially areas of particular importance for biodiversity and ecosystem functions and services**. This must be achieved through **ecologically representative, well-connected and effectively governed protected-area systems** and other effective area-based conservation measures. Given the great under-representation of lowland ecosystems, including wetlands, in public conservation land (PCL), and the critical need for connectivity to enable biodiversity to adapt to climate change, these properties for protected areas must be central to the NCPS.

⁴ Convention on Biological Diversity 2022. [Decision adopted by the Conference of the Parties to the Convention on Biological Diversity](#).

13. The NCPS needs to recognise the value of PCL and waters for carbon storage and sequestration. A recent study⁵ found a persistent carbon sink in New Zealand's terrestrial biosphere (~171 million tonnes of CO₂ per year), which is more than five times Aotearoa's gross CO₂ emissions in 2024 (31.5 million tonnes⁶). This sink is concentrated in the South Island, in regions dominated by mature indigenous forests and certain grazed pasture regions. It likely is occurring largely on PCL. When achieving the Paris Agreement's CO₂ emission reduction goals heavily relies on enhancing carbon storage and sequestration in forests globally⁷, not to recognise and protect this degree of nature-based solutions would be utter folly.
14. The NCPS needs to recognise that the overall value generated annually by PCL to the economy likely runs into tens of **billions** of dollars^{8,9} — not the mere millions generated by concessions (consultation document, p.4). This wealth is generated by the goods and services provided by PCL including clean air and water, soil health and stability, flood mitigation and drought resilience, recreation opportunities and a myriad of other critical services.
15. Given the long-term nature of the NCPS, the premise that ecosystems (and species) are static and can be defined by location is not realistic, particularly in a rapidly changing climate. The location-based nature of the 'values' around which the NCPS would be based (e.g. contents of area plans, policy 10) is a fundamentally flawed concept. The reality is that ecosystems and species are dynamic, moving over time in response to changing environmental and biotic conditions. This natural process is being dramatically accelerated by climate change. As temperatures relentlessly increase, sea levels rise and extreme events exponentially increase, species and ecosystems are on the move: inland, southwards, and up in altitude (if they can). This places major stresses across and beyond the PCL estate, but especially on coastal and alpine areas. This issue goes well beyond the need to include climate change as one of many threats (Q1); rather it must be considered as an overarching management concern across all policies.
16. Policy 1 provides that the proposed NCPS applies to 'land and other natural resources ... administered by the Department'. 'Natural resource' is defined, after the Conservation Act 1987, to include: plants and animals of all kinds; and the air, water, and soil in or on which any plant or animal lives or may live; and landscape and landform; and geological features; and systems of interacting living organisms, and their environment. However, 'natural resource' is a value based on utility to humans. This approach has dangers. While changing the definition in the Conservation Act is beyond the scope of the NCPS,

⁵ Bukosa, B., S. Mikaloff-Fletcher, G. Brailsford, et al. 2025. Inverse modelling of New Zealand's carbon dioxide balance estimates a larger than expected carbon sink. *Atmospheric Chemistry and Physics* 25(12): 6445-6473.

⁶ Ministry for the Environment 2026. [New Zealand's greenhouse gas inventory 1990–2024](#).

⁷ Windisch, M.G., F. Humpenöder, L. Merfort et al. 2025. Hedging our bet on forest permanence for the economic viability of climate targets. *Nature Communications* 16(1): 2460.

⁸ Patterson M.G., Cole A.O. 2013. [Total economic value of New Zealand's land-based ecosystems and their services](#).

⁹ NZIER. 2024. [The value of public conservation land. A report to the Department of Conservation](#).

we **recommend** it embrace a broader characterisation of natural resources, including Nature having intrinsic value independent of any utility, and recognising Te Taiao in te ao Māori, the natural world that contains and surrounds us, and Papatūānuku who embraces and sustains us.

17. Concessions and tourists/visitors should be assessed based on their impacts - positive or negative - on all these core ecological attributes and services on which we (and our national economy) depend.
18. A particular concern is the general absence (except in visitor amenities areas or where otherwise provided for in Treaty settlement legislation) of a clear carrying capacity and cumulative effects framework. The sustainable management of PCL, particularly national parks, needs to ensure that tourism and visitor activities in their totality have extremely limited or no impact on biodiversity and ecosystems. The consultation document argues that limits and conditions are important tools for protecting conservation but are more effectively enforced through other tools such as bylaws or regulations, while also mentioning the possibility of access charging and booking systems. However, it does not provide evidence to support this assertion, and our perusal of regulations and bylaws that DOC enforces¹⁰ does not indicate how they would be effective. A substantial level of new bylaws and regulations appears to be envisaged. Without a clear carrying capacity and cumulative effects framework, it is likely that over-visitation and other concessionaire activities will negatively affect conservation outcomes and likely diminish the visitor experience.¹¹ We **recommend** that the NCPS include a protocol to manage carrying capacity limits and cumulative effects. It should be explicitly considered in competitive allocation processes. (See also Q6).
19. The NCPS needs to recognise and support contributions of the Department's partners in conservation—iwi, community groups, and the public—in achieving conservation. People, professionals or volunteers who work for years in an area removing pests, caring for plant life etc. come to appreciate the multiple layers of species that make up habitat and their knowledge should carry weight.
20. The word significant and its derivatives (e.g. significantly) are frequently used in the consultation document. It is not defined in the Glossary. The meaning of 'significant' needs to be established. It is a relative term. It likely will vary in space and time. We **recommend** that the meaning of 'significant' be explicitly defined in the NCPS.
21. The consultation document would leave entirely to the discretion of the Director-General their function under new Section 13I to determine the boundaries for area plans. These need to be matched to public relationships with conservation land and waters and

¹⁰ E.g. Department of Conservation 2026. [Acts, regulations and bylaws we enforce. Nelson Lakes National Park Bylaws 2006.](#)

¹¹ Regarding cumulative effects, see Roper-Lindsay, J., S.A. Fuller, S. Hooson, et al. 2018. [Ecological impact assessment. EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems](#) (p. 86).

conservation values and ecological functions. We consider this is a function for which public input is vital, and the best way to do so would have been through the public consultation phase of this first NCPS. We **recommend** that the Department publicly engage when determining area plan boundaries.

22. The level of zoning of national parks in new area plans should be comparable to the existing zoning.

4. Detailed Comments - Responses to Questions

Directing content of area plans

1. Is there additional content you believe should be included or removed within area plans?

We are gravely concerned at the underlying premise of Area Plans to facilitate economic activity on PCL, rather than conservation. The summary box between Policies 15-16 (p. 12) states that descriptions of values are there to guide development of concessions, resource management and mapping of visitor zones. There is no mention of these descriptions guiding the conservation, protection and restoration of the natural values in the Area, which surely should be the highest priority of the outworking of Area Plans?

We are also concerned that Area Plans will contain no information on limits or conditions, but that this information will be contained elsewhere, impeding access to the information by both those concerned with actual conservation and those seeking concessions.

Values, threats and pressures

In Policies 10 & 17, 'known' is redundant. Much of Nature is unknown and descriptions can only be based on what is known. Our knowledge of the complex myriads of species, processes and interactions that ensure ecosystems remain healthy is at best limited, and often woefully inadequate. It is critical that we implement the precautionary principle where knowledge gaps exist.

Policies 10, 11 and 12 must include details of all values, not just summaries. It is critical that all the physical, biological and cultural values of an area are documented in the one place, along with details of their conservation and management. Without detailed information in area plans, it is likely that data will be lost. Referencing of information sources would help conciseness.

All indigenous species, whether considered significant or not (significant decided by whom, by what criteria?) must be protected and conserved. Species rely on all other species in their ecosystem, whether we know about them and consider them significant or not. Microbial species, soil dwellers, invertebrates – all are critical to our ecosystems and overall biodiversity. We may not know they exist but without them our ecosystems degrade or collapse.

Policies 10 & 14: Professional guidance is that detailed description always precedes summary.¹² We **recommend** DOC compile detailed descriptions of the indigenous species habitats, ecosystems, values, threats and pressures etc. of an area; have this peer reviewed; publish it; and then bring the summaries into area plans, with transparent referencing to the detailed data so it can be easily accessed.

Policy 15: replace “may” with “must”. How can areas be managed if the threats to values are not well documented and understood? Threats considered should include recreational and tourism use.

Additional Policies

- Area plans must include details of specific services provided by the natural environment (land/soil, water, air, ecosystems) and applicable conservation principles (representativeness, connectivity, threatened and at risk species).
- Area plans must detail anticipated direct and indirect impacts of climate change - drought, fire, flood, increases in temperature (minimum, average and maximum), sea level rise, increased frequency of extreme events, etc - on these ecosystem services; and how these impacts may be mitigated or services enhanced (e.g. carbon sequestration, flood protection).
- Area plans must identify likely pathways for migration of ecosystems and key fauna and flora (including invasive pests/diseases), to ensure these future-oriented conservation priorities and locations are considered in decisions on concessions etc.
- Area plans must include threats from human interventions on PCL (e.g. risks of visitors inadvertently introducing novel pests/diseases, starting fires etc.).
- Area plans must describe conservation activities on PCL intended to protect, support and restore species and ecosystems, and to arrest decline.
- Area plans must consider DOC’s Climate change adaptation action plan.

Objectives

Policy 17 (amendment and addition):

- Area plans must set objectives to provide for the protection and preservation of [~~delete known-significant~~] indigenous species, habitats and ecosystems (**and the ecosystem services they provide**), **while taking climate change impacts into account**.
- Area plans must specify the management activities that will be undertaken to achieve the objectives that have been identified.

Additional Policy

- The NCPS must ensure that there will be regular, adaptive and iterative reassessment of area plans, and government must resource DOC adequately to ensure this occurs in a timely manner.

¹² For example, Roper-Lindsay, J., S.A. Fuller, S. Hooson, et al. 2018. [Ecological impact assessment. EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems](#) (p. 48).

2. Do you have views on any transitional policies for area plans that should be considered?

No

Visitor zones

3. Do you have any feedback on the proposed approach to developing visitor zones?

- The purpose of visitor zones, i.e. what these zones will mean in practice, is unclear. Because the criteria for visitor zones (e.g. easy access) are not aligned with the land classifications, there is potential for visitor zones to conflict with the purposes for which land is held under the Conservation Act.
- The division of the PCL into visitor zones privileges humans over Nature – this is contrary to the purpose and ethos of conservation.
- A preferable method for determining the scope and potential of concessions for visitor use would be to divide PCL into areas of current and future conservation value, including having regard to the importance of the ecological services provided (based on ecological and other information, not broad PCL category). An overlay of appropriate visitor zones that are consistent with the conservation of ecological value/services (rather than PCL category) should then be derived.

Exempt activities

4. Do you have feedback on any of the activities proposed for exemption from requiring a permit, and should we consider any others?

- News media: this exemption applies only to members of the NZ Media Council (MSM). How are new media such as TikTok, Instagram and YouTube (and the influencers etc. who post there) to be regulated? Do they count as individual visitors with no need to seek prior approval (even if they have millions of followers) or will they need to apply for a concession (clogging the system)?
- We support the proposed exemptions for research relating to air collection and water collection only.
- However, we do not support the exemption for observational research (e.g. observing wildlife) as the cumulative effects of multiple people observing wildlife could potentially become problematic for wildlife. For example, if a bird colony became “Instagrammable” then hordes could descend on the colony, all purporting to be doing “research” and DOC would have no way of managing the problem. Requiring a permit would enable DOC to police problem areas and check that those observing wildlife are doing it appropriately and with permission. Given that other data collection for research requires a permit, it is more sensible to require a permit for observational research.

5. Are there other conditions you think should be included or removed for these exempt activities?

The public access condition should also apply to collection of air for research purposes.

Pre-approved activities

6. Do you have feedback on any of the activities proposed for pre-approval, and should we consider any others?

a. The overarching problem with the pre-approved activities, applications for which DOC will not be able to turn down, is cumulative effects. There do not appear to be any safeguards to prevent multiple concessionaires from setting up guided walks, rides, boating, rock-climbing, drives, horse treks, undertaking filming, research collections or using drones, all in the same area. If each concessionaire meets the terms and conditions, then DOC cannot stop them from operating. Our PCL could become a mess of drone use and filming and horse trekking and 4wd vehicles, all competing in the same physical space, all potentially creating noise, disturbance and damage to the ecosystems and biodiversity for which our PCL actually exists. Small impacts accumulated over time have big consequences. This is not acceptable.

DOC needs to retain the ability to assess each application on its merits **and** in the context of existing activities within the area.

Even research activities, with theoretically limited collection of samples, can have a cumulative impact when multiple researchers access the same area. This needs to be controllable, with DOC retaining the ability to issue permits that acknowledges all research activities within the area, as well as other considerations. Budgetary constraints should not be used as an excuse to reduce oversight and control over concessions.

As at paragraph 15 (above): We **recommend** that the NCPS include a protocol to manage carrying capacity limits and cumulative effects.

b. Appendices 2 & 4

In all places where the wording occurs (in relation to disturbance of wildlife), remove the word ‘unnecessarily’:

You must take all reasonable care to ensure wildlife are not disturbed ~~unnecessarily~~.

Wildlife should not be disturbed for the sake of these activities.

There should be a standard condition across all consents requiring concessionaires to take steps to be aware of the wildlife values of areas they are operating, supported by DOC information services.

c. Tables 2 & 4: Horse trekking

Horses may propagate invasive weed seeds on PCL through their excreta. Because conditions to limit effects are likely not to prevent weed introduction and spread, there should not be a general authorisation of horses on PCL. Specifying permitted suitable areas would greatly reduce risks and be much simpler to enforce.

In Tables 2 & 4, amend the first specification in the description to: ‘where the activity is ~~not prohibited~~ **permitted** by bylaws or regulations’.

In Table 4, delete ‘and where horse-riding is not prohibited by bylaws’.

d. Table 4: Biosecurity is critical for all pre-approved and other classes of activities. The biosecurity condition must be enforced rigorously – fines and withdrawal of concessions must

be built into these conditions. Previous offences must be taken into account when considering new concession applications (by individuals as well as business entities).

e. Table 4: Drone use

Drones should not be included in this pre-approved category. Drone use is likely to impact negatively on birdlife, especially sea, shore and river birds, including disturbing colonies during the breeding season. Pre-approval is inconsistent with conservation in this case. The conditions detailed (pp. 51-53) attempt to manage this, but as risks are very site specific and seasonal it would be far preferable to avoid pre-approval entirely. Drone use also impacts on site tranquillity and is a major nuisance for other PCL users.

If drone use is to remain pre-approved, the conditions covering interaction with wildlife and marine mammals need to be much strengthened. These conditions rely on wildlife and marine mammals being visible but that frequently is not the case e.g. nesting birds generally, threatened species nesting, feeding and loafing on riverbeds or their banks (wrybill/ngutu pare, banded dotterel/pohowera, whio). We would **recommend** the proposed conditions be subject to expert review.

f. Table 4: Limited collection of rocks, soil, non-protected wildlife and flora for research purposes.

A cumulative effects protocol is needed in all cases.

The schedules referred to under non-protected wildlife and non-threatened flora need to be identified.¹³

In relation to non-protected wildlife, we do not understand: Does not include use of fumigants or coring to collect samples.

7. Are there other terms and conditions you think should be included or removed for these pre-approved activities?

Areas where pre-approved and exempt activities do not apply

8. Are there areas where you believe exempt and pre-approved activities should not apply? Please describe the area(s) in detail and the significant adverse effects on natural, cultural, or historic values, and why adverse effects cannot be avoided or mitigated.

- Farewell Spit Nature Reserve, an internationally important Ramsar site, where there is already no public access, should be such an area. Similarly for the Cape Farewell Ecosanctuary where public access is strictly controlled due to new breeding colonies of fluttering shearwaters etc.
- As a land classification class, all Nature Reserves and Scientific Reserves, Wildlife Sanctuary areas, Wildlife Refuges, National Park specially protected areas (e.g. Honeycomb Hill caves, Westland Petrel), Wilderness areas; also any other PCL with restricted public access (by foot or by helicopter).
- Tōpuni and Nohoanga should be subject to consultation with iwi.

¹³ Note: that they are not identified in the consultation document has hindered our ability to critique this matter.

9. What costs and benefits do you see in not applying exempt and pre-approved activities in specified locations?

For the Farewell Spit Nature Reserve and Cape Farewell Ecosanctuary:

- Benefits: to the natural environment and for specific taonga species in these limited areas
- Costs: none, as a concession for tour groups already exists at Farewell Spit Nature Reserve for one company with a history of exemplary conduct.
- Note: we consider the Farewell Spit tours concession is an excellent model for considering carrying capacity and cumulative effects.

Activities with standardised pre-assessment

10. Do you have feedback on any of the activities proposed for standardised pre-assessment?

- The overarching problem here is that current land classification is not necessarily congruent with conservation value, or the nature and importance of the ecosystem services that a given area provides. The basis for Tables 6 & 7 is flawed and their application will provide poor guidance for the stated aim of standardised pre-assessment. National Parks, for example, cover a wide range of ecologies and landscapes with different threats and conservation objectives. These, and their locations, are dynamic, with climate change providing an extra level of uncertainty and risk. Reducing this to a single tick-box for each activity is simplistic and inherently dangerous.
- Large tourism facilities (hotels/motels/lodges, eateries, staff quarters are completely inappropriate on PCL (Tables 6 & 7).
- Hydroelectric development is a completely inappropriate activity in Conservation Parks and Stewardship Areas (Tables 6 & 7). The infrastructure required and impacts of freshwater ecosystems are completely incompatible with conservation.
- Likewise, it is unclear as to when Cropping is likely to be an appropriate activity in Conservation Parks and Stewardship Areas. Again, it is incompatible with conservation.
- We **recommend** large tourism facilities, hydroelectric development and cropping be deleted as activities with standardised pre-assessment as they are inappropriate activities on public conservation lands and waters.
- Exotic harvest must only be an appropriate activity on PCL where the intention is to permanently remove exotic species from indigenous ecosystems. Otherwise it is completely inappropriate.
- Table 6 lumps Amenity Areas and Natural character areas. The latter are specially protected areas under the Conservation Act, to be renamed natural character areas under the Bill (as noted). Showing large tourism facilities as consistent with natural character areas appears to be a mistake.
- Wilderness areas should be specifically shown in Table 6, not subsumed into Other. They should have similar settings as sanctuaries.

11. Do you know of any other commonly undertaken activities on PCL which should be included in the list of activities?

Policies for the management of specific activities

12. Are there other management matters we should consider for one (or more) of these activities?

- Policies 32–34 Grazing and farming
Productive livestock farming is incompatible with New Zealand’s natural environment, producing pollution on a massive scale, including water nitrification and methane gas. The default position of the NCPS should be to deny these activities. Limited livestock grazing may be permitted as a management tool (e.g. to control fire risk or wilding pines in grasslands) but should be deployed judiciously and only as a temporary measure for which income generation is not the objective. In particular, grazing and/or farming in National Parks should be denied in all circumstances, as it should on areas purchased by the Crown for conservation purposes or transferred to conservation land status through the tenure review process. We do recognise however that rights to graze some South Westland river valleys were preserved when the Mt Aspiring National Park was created in 1964, and there be other such situations. For these, the policy should be to negotiate phasing out of the grazing.

The condition in Policy 32 for possibly granting a grazing or farming concession when the ‘land ... has previously been in pasture of farming use since 2000’ needs to be qualified by adding: ‘and does not have actual or potential conservation value’.

- Policy 45 Commercial fishing in national park waters
The Policy should specifically apply to exotic species only. Whitebait, tuna and lamprey should not be harvested in national parks; this should be clarified. Reference to ‘exceptional circumstances’ creates wriggle room and negates the apparent intention of 45a, b & c to define exceptions; this should be deleted. The apparent intention that all of circumstances 45a, b & c should be met requires that 45a be followed by ‘and’. ‘Limited term’ is vague and should specify a time period e.g. ten years.
- Policies 41 & 47
New introductions of exotic fish or aquatic life into waters within national parks and other PCL should be banned by default, as these species have no place in a natural indigenous environment, even if they may be already present in the proposed area, for the reasons that:
 - introducing new breeds/genes to an existing population may increase its ecologically destructive potential
 - introduced trout and salmon exert severe predatory pressure on New Zealand’s indigenous freshwater fish
 - and in the case of Policy 41, national parks shall be preserved as far as possible in their natural state.

13. Is there any additional feedback relating to these activities you wish to provide?

14. Should any other activities be managed by the NCPS?

While invasive pest and weed species are referred to policies and conditions in the consultation document, there is no mention of management of invasive species on PCL. This includes pest plants, invertebrates, pathogens, fish, reptiles, amphibians, herbivores and predators. Indeed, any species not native to Aotearoa.

These invasive species are having significant impacts on our native biodiversity, and these impacts will only escalate with climate change. It is imperative that DOC is funded sufficiently to enable the control of all invasive species, with eradication programmes undertaken where feasible. No exotic species should be tolerated on PCL and no exotic species should be managed to maintain their populations on PCL. PCL is for our native species, to enable them to flourish and thrive. Exotic plants, fish, grazers, herbivores, predators can only have negative impacts on native biodiversity and ecosystems, and these impacts must be reduced to the lowest possible level. Removal of all ungulate species from our forests for example, will enhance forest health (through protection of soils, litter and natural regeneration processes) and rates of carbon sequestration. There are a myriad of other examples whereby removing invasive species from our PCL will have multiple benefits for both PCL and for our wider ecosystems.

We are particularly concerned that managing exotic species on PCL for recreational hunting subverts the very purpose of PCL – areas set aside to ensure the conservation of the unique and precious biodiversity and ecosystems of Aotearoa.

The NCPS should require DOC to provide relevant information on invasive species for concessionaires, so they are aware and cannot use not knowing as a defence in any breach of concession conditions.

Exemption from district land use consents

15. Are there other activities you think should be included in the non-exhaustive list (noting the activities must meet the requirements of the RMA section 4(3) exemption)?

Policies for land reclassification

16. Is there any feedback you wish to provide regarding these reclassification policies?

The heading preceding Policy 57 (Reclassification of national parks) appears to refer not to reclassification but the process for new national parks or national park additions.