

SRDG Submission on the Conservation Amendments Bill

Submitter Details

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This submission is made on behalf of Politics of Tomorrow as part of SRDG Incorporated and it thus reflects the views of the submission team working within Politics of Tomorrow, not any individual member or any other department associated with SRDG. It has been approved by the chairperson of the General Committee, Yichen (Leo) Qin, and the Director for the Politics of Tomorrow Initiative, Maya Fletcher.

About SRDG

SRDG Incorporated is a student-led organisation with the mission to first empower young people to lead change across a variety of issues and secondly raise awareness and ensure the relevance of the humanities in today's society. We represent over 120 members and 50 staff with partner organisations across the country and internationally.

Our purposes relevant to this Bill are our emphasis on civic participation and public discourse whereby we encourage people to actively participate in democracy. This proposal is developed by our Politics of Tomorrow initiative, our primary initiative dedicated to the development of youth leadership in policy and advocacy and civics education.

Oral Submission

We wish to appear before the Committee to speak on this submission.

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Introduction

We strongly oppose the Conservation Amendment Bill 2026 in its current form and recommend that the select committee decline to report back for a second reading. We believe it would be not only detrimental to the ethos and effectiveness of conservation in New Zealand and leave potential for irreversible damage to the natural environment, it would also fall short in achieving long term sustainable economic development for New Zealand.

We have identified and detailed out four major components which the bill proposes which we oppose: the fundamental reorientation of the mission of the Department of Conservation, the potential avenues the bill leaves to further exploitation of conservation land in conjunction with an unnecessary consolidation of authority with the Minister of Conservation, a noted absence of consideration for the Kunming-Montreal Global Biodiversity Framework, and finally an assumption laid there within the bill which is precipitated upon an overestimation of the sustainability and economic viability of the tourism industry in New Zealand.

We acknowledge and welcome the Government's decision, announced on the 25th of June 2026, to remove the land exchange and disposal provisions from the Bill. Nevertheless, we hold firm to the belief that the decision does not go far enough and our concerns which will follow remain unaddressed. Therefore we ask the committee to read this document with this acknowledgement in mind.

Section 1: Changing the purpose of the Department of Conservation

Our single greatest concern with this bill is that it amends section 6(e) and others so that the Department of Conservation (DOC) must “recognise economic opportunities that arise from the use and development of land and other natural resources and historic resources managed by the Department, and to enable this use and development to the greatest extent practicable.”

The Department of Conservation has, in its current form under the Conservation Act 1987, proved to be remarkably effective at fulfilling its stated goals, especially given its limited resources. Particularly in the conservation of biodiversity, DOC has developed a program globally recognised for its efficacy and scale and has been the benchmark by which other countries have developed their conservation efforts upon. We would point the committee to the following:

- The cost-effectiveness of our pest control process which utilises aerial 1080 instead of fenced sanctuary land. According to the New Zealand Journal of Ecology, this approach works out to being in the order of 200 times cheaper^[1]. This is sustained over 1.8 million hectares of conservation land^[2], indicating the cost-effectiveness and proven reliability of pest control methods currently used by DOC in preserving biodiversity. We believe this is indicative of their current effectiveness, which would be compromised by the bill.
- DOC also maintains a sizeable and sustainable tourism and recreational section. Notably, the success of the Great Walks programme, with close to 100,000 people booking a great walk annually, 35% being international visitors^[3], has proven to be extremely beneficial to not only revenue but also the public perception of New Zealand. To us, this illustrates that DOC already successfully balances the competing needs of conservation and economic use.

In our view, including economic development in DOC’s portfolio as an objective of equal importance as conservation distracts from DOC’s core mission. In addition to potentially undermining environmental protection, having to satisfy two contradictory requirements would likely make it more difficult for DOC to efficiently use its already limited budget. As such, we are concerned that this change would make the Department a less effective organisation on the whole.

We ask the Committee to note that the new section 6 (ea) places a maximisation instruction (“To the greatest extent practicable”) alongside a conservation purpose which notably carries no equivalent superlative. For a Department whose fundamental goal is conservation, this represents a major shift in direction, and allows for considerable interpretation.

We hence ask that, if the Bill does progress to a second reading, the ‘greatest extent practicable’ maximising clause be removed in its entirety or that equivalent modifiers be applied to the conservation purpose.

Section 2: Concentration of Ministerial Authority and Exploitation Risk

Under the Amendment Bill as proposed currently, Section 3D permits the Minister of Conservation to designate Visitor Amenity Areas (VAAs) within conservation parks, stewardship areas, and national parks, enabling accommodation, cafes, restaurants, car parks, and other commercial services. There are several sections of this mechanism that concern us:

- VAAs can be established “on the Minister’s own initiative” (16. 2a)
- The definition of ‘visitor amenities’ is very broad. Notably, it includes “any other infrastructure that supports visitors and recreational activities” (16A), which is highly subject to interpretation. It could be read, for instance, as permitting the construction of access roads through protected areas, or of large scale deforestation. While abuse is not guaranteed, the looseness of the wording undermines protections elsewhere in the Conservation Act.
- A submitter on VAA proposals “has no right to be heard to their submission” except at the Minister’s discretion. (Section 16D)
- The minister can set apart a VAA on land that is “predicted” to be of high visitor use 16E(2)(b)(i). Given the variable nature of long-term predictions of visitor numbers and the lack of clarification of “high visitor use”, this gives the Minister a great deal of leeway in deciding whether areas qualify for VAA designation.
- The Minister may proceed with a proposal “regardless of whether the Minister’s decisions on the location of the VAA or content of the VAA chapter will be inconsistent with...the purposes for, or principles under which, the conservation park, stewardship area, national park, or reserve is held.” (16E, 3)

In effect, these and other clauses, give the Minister of Conservation, a political appointee, the power to unilaterally overrule existing conservation policy under very broad and permissive conditions, and to push them through with limited opportunities for feedback. Strong protections on conservation land exist because errors are essentially irreversible. Once an area is developed, the impacts on local ecology can remain for centuries, even if the original development is reversed, which is economically unlikely. As such, this bill opens up centuries-old taonga, the common heritage of all New Zealanders past, present, and future, to the potential risk of abuse by a single person in the span of a three-year term.

We believe that the practical effect is that section 3D would still be able to achieve much of what the disposal provisions would have achieved, that being permanent,

commercially-operated development displacing the character of conservation land. Given the bill also separately permits concessions of up to 60 years for activities tied to ‘critical infrastructure’, a VAA-linked concession of that duration is effectively and functionally indistinguishable from disposal for a lifetime.

Furthermore, the proposed section 6B reduces the role the New Zealand Conservation Authority (NZCA) plays in conservation by removing its function of approving conservation management strategies and plans. Instead, it retains only the power to comment on the National Conservation Policy Statement (NCPS) and draft area plans. Similarly, Conservation Boards are also reduced in authority. We particularly oppose this because in relation to VAAs, the body most able to assess whether a proposed VAA is consistent with the conservation values of the land which it sits upon will no longer have the power to withhold approval; only to register an opinion which the Minister remains free to disregard. We therefore ask the Committee to consider this as reason to reject the bill, or at the very least, to retain section 6B(1)(a)-(c) in its current form.

We would also like to note that the removal of the disposal and exchange provisions from the Bill as introduced does not prevent their reintroduction at a later stage in legislation. Either through Amendment Papers during the Committee of the Whole House stage of this Bill, or through related legislation. Despite statements from the minister currently, there are no legal safeguards that bound this or any future governments from reintroducing said provisions. Therefore we strongly recommend that the committee recommend against the reintroduction of disposal or exchange provisions for the affected land classes whether in this bill or in parallel legislation.

Ultimately the 25 June announcement, despite being a welcome change, does not fully dispel our concerns with this Bill. There remains a new purpose clause instructing maximal economic enablement, a new land-use category permitting substantive commercial development on a speculative basis with no right to being heard; disempowered independent bodies that can no longer assess conservation consistency and there remains no binding guarantee against the reintroduction of the provisions previously removed.

Section 3: Kunming-Montreal Global Biodiversity Framework

Given the concerns raised above, we would like to remind the Committee of Aotearoa New Zealand’s existing commitments under the Kunming-Montreal Global Biodiversity Framework. Not only are we party to it, but as one of the strongest initial supporters of the Framework, we have additional responsibility to uphold it to the best of our ability. It sets ambitious targets to “halt and reverse biodiversity loss”, and requires concrete plans of action from parties to it. As such, we ask the select committee to formally consider whether the proposed Bill is in line with our pre-existing obligations under international law.

Section 4: Overemphasis on tourism as a source of income

We also note that, in the long term, there is a risk that short-term decision making could defeat the very goals this bill seeks to achieve. Ultimately, Aotearoa New Zealand's reputation for pristine, beautiful natural landscapes is the primary attraction for tourism. To risk compromising this to gain greater amenities for tourism strikes us as counterproductive.

We further wish to call into question this bill's underlying assumption that expanding the tourism industry via increased development on conservation land would benefit New Zealanders. While we acknowledge tourism to be an important part of our economy, it is a structural outlier where among other more economically developed countries (MEDC), Aotearoa New Zealand would be pursuing an unique growth strategy.

We make this argument as the cumulative result from the following points.

The adult minimum wage in New Zealand is \$23.95 from April 2026^[4], equivalent to approximately \$48880 gross per year for a 40 hour week. This sits well below the median NZ full-time employee income of around \$70000-\$73000^[5] per year. Hospitality and retail roles, the roles which are most directly related to and created by visitor amenity development such as restaurants and accommodation, are concentrated at or near minimum wage. We note that Hospitality NZ's own 2025 benchmarking data, which captures average salaries of \$83415, is inflated by management and specialist roles. This is important because we do not believe that the type of development this bill encourages will create durable careers with advancement opportunities. Specifically, we believe the largest portion of employment type which VAAs will generate will be seasonal, limited in hours, and casual in nature. As such, we are concerned that the Bill risks irreversibly damaging conservation for minimal economic benefit.

We also would like to note the instability inherent to the tourism industry, where it is structurally bound and exposed to political and travel disruptions. This very prominently was demonstrated by the recent pandemic. Hence where the bill authorises land-use commitments of effectively life-time permanence: Visitor Amenity Area designations carry no statutory time limit as introduced, and associated concessions may run for up to 60 years. We suggest that by committing to near-permanent changes in land use and irreversible changes in character, reliant on a demand signal that is inherently volatile over a much shorter timeframe, represents a mismatch between legislation and economic demand.

We clarify that we are not opposed to tourism, however we believe that if Aotearoa New Zealand wishes to deliver sustainable and long-term economic growth for its people, further efforts are better directed elsewhere; especially not at the cost of conservation.

Summary of Recommendations

1. We ask the committee to decline to return the Bill for a second reading, or at the very least make substantial amendments to the new section 6(e) so that the conservation purpose carries equivalent maximising language, or the economic enablement purpose be struck.

The following recommendations are if the bill should be returned to a second reading.

2. Require a formal assessment of the Bill's consistency with New Zealand's commitments to the Kunming-Montreal Global Biodiversity Framework and national targets should the bill be reported back.
3. Narrow the scope of the new Part 3D (VAA) by capping the scale, number, and total area of VAAs; exclude permanent commercial accommodation and require VAA designations to be consistent with the conservation purpose of the land
4. Restore a right for submitters to be heard on notified VAA proposals under new section 16D, consistent with the standard applied elsewhere in the 1987 Act.
5. Amend section 16E(2)(b)(i) so that VAA designation requires demonstrated visitor use over predicted visitor use.
6. Retain Section 6B(1)(a)-(c) in its current form so that the New Zealand Conservation Authority's and Conservation Board's approval functions and authorities are preserved and not reduced to merely commentary roles.
7. Record a formal recommendation against the reintroduction of the land exchange or disposal provisions for the affected land classes, either by Amendment Papers or through related legislation.
8. Require a formal assessment of the employment quality likely to result from the development enabled under the Bill before further provisions are enacted upon.

Bibliography

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