



Submission on the Conservation Amendment Bill

The Opportunity Party (Opportunity) welcomes the opportunity to submit on the Conservation Amendment Bill.

Opportunity is a political party committed to evidence-based policy, practical solutions, and long-term thinking. We believe Aotearoa New Zealand's biggest challenges require moving beyond short-term politics and focusing on what the evidence tells us will deliver better outcomes for people, communities, and the environment. We support transparent, accountable decision-making and policies that protect and restore nature and advance the long-term interests of New Zealanders.

We believe our public conservation lands are among our country's greatest assets - protecting irreplaceable biodiversity, safeguarding ecosystem services, supporting recreation and tourism, strengthening climate resilience, and providing places of deep cultural significance for present and future generations.

Healthy ecosystems are not simply an environmental aspiration; they are fundamental to New Zealand's long-term prosperity and wellbeing. Nature underpins our economy through the clean water, fertile soils, pollination, carbon storage and resilience it provides, yet these values are too often overlooked in public policy and economic decision-making. Opportunity's [Healthy Land](#) policy recognises that restoring New Zealand's natural capital is essential to securing both environmental and economic outcomes for future generations.

The Conservation Amendment Bill misses an opportunity to embed this principle. Instead of strengthening the role of natural capital in conservation decision-making, it places greater emphasis on facilitating development while simultaneously weakening some of the institutional safeguards that have historically protected public conservation land.

Against that backdrop, Opportunity supports modernising New Zealand's conservation system. The legislative framework governing the Department of Conservation has become increasingly complex, concession processes are often slow and inconsistent, and management planning can be unnecessarily inflexible.

However, reform should be measured by whether it strengthens conservation outcomes. Improving administrative efficiency is worthwhile, but it must not come at the expense of biodiversity protection, good governance or public confidence in the stewardship of our shared conservation estate.

Opportunity supports many of the Bill's administrative improvements, including measures to streamline concession processing and modernise conservation planning. These reforms have the potential to improve the effectiveness of the conservation system if accompanied by robust environmental safeguards.

However, we oppose several of the Bill's more significant changes. In particular, we are concerned that it:

- changes the statutory functions of the Department of Conservation in a way that weakens its conservation-first mandate;
- places greater emphasis on enabling development without adequately strengthening environmental safeguards;
- concentrates decision-making authority in the Minister while reducing independent oversight and opportunities for public participation;
- unduly narrows the Crown's undertakings to Māori in the context of conservation management; and
- fails to recognise the full value of New Zealand's natural capital and the ecosystem services it provides.

Taken together, these provisions represent more than administrative reform. They alter the direction of New Zealand's conservation system without demonstrating how they will improve biodiversity outcomes or help reverse the ongoing decline of nature in Aotearoa.

Opportunity supports a conservation system that is efficient, transparent and science-led, but above all one that remains firmly focused on protecting and restoring New Zealand's unique natural heritage. This submission outlines where we support the Bill, where we believe amendments are necessary, and how the legislation can better achieve those objectives.



This submission is based on the Government's announcement that it will remove provisions in the Bill relating to the exchange or disposal of public conservation land; it does not comment on these.

We support sensible streamlining

The Opportunity Party supports efforts to modernise New Zealand's conservation system. The current concessions process is frequently slow, inconsistent and unnecessarily resource-intensive for both applicants and the Department of Conservation. Likewise, aspects of conservation management planning have become overly rigid and inefficient.

Replacing an overlapping, multi-layered planning hierarchy with a single National Conservation Policy Statement and a consistent set of area plans is a reasonable administrative improvement, as is standardising and speeding up the concessions process. Reducing unnecessary duplication and delay should reduce compliance costs, allow Department of Conservation staff to focus on higher-risk activities, and provide greater certainty for tangata whenua, community organisations, tourism operators and businesses seeking to undertake appropriate activities on conservation land.

We support many of the Bill's administrative reforms, including measures to simplify concession processes, clarify decision-making pathways, provide greater flexibility in conservation planning, and improve cost recovery where appropriate.

However, regulatory efficiency must never come at the expense of environmental integrity.

The Opportunity Party supports risk-based regulation, but only where robust environmental bottom lines remain in place. The objective should be a conservation system that is both faster and better: one that delivers timely decisions while maintaining public confidence that biodiversity protection remains paramount.

Opportunity recommends:

- Retaining the Bill's administrative reforms that improve efficiency and reduce unnecessary regulatory burden;



- Strengthening environmental safeguards for exempt and pre-approved activities by requiring that conservation values are maintained or enhanced; and,
- Requiring ecological assessment and monitoring where streamlined approval pathways may result in cumulative environmental effects.

We oppose the Bill changing the functions of the Department of Conservation

Opportunity supports a modern, efficient conservation system that enables New Zealanders to enjoy and benefit from our natural environment. However, we do not support changes that fundamentally alter the statutory purpose of the Department of Conservation.

The proposed amendment to section 6 would require the Department to "recognise the economic opportunities" arising from public conservation land and to enable their use and development to the greatest extent practicable. While economic activity has an appropriate place within the conservation estate, this proposal shifts the Department's role from that of steward to facilitator of development. This is a significant change, and - notably - a shift that the Government expressly ruled out during the public consultation phase.

The Conservation Act has, since 1987, treated the protection of biodiversity, landscapes, ecosystems, public access and cultural values as a distinct form of stewardship. Native ecosystems provide clean water, carbon storage, climate resilience, cultural identity, recreation opportunities and habitats for threatened species. These are public assets that underpin New Zealand's long-term prosperity, even where their value is not reflected in conventional markets.

Commercial use of conservation land is already possible through the concessions framework where it is compatible with conservation outcomes. We see little evidence that changing the Department's statutory functions is necessary to improve decision-making or reduce unnecessary regulatory burden. Instead, it risks creating ambiguity about the Department's primary purpose and encouraging decisions that prioritise short-term economic returns over long-term environmental outcomes.

Read alongside similar language proposed for the National Conservation Policy Statement, area plans and concessions, the proposed changes to section 6 risk turning economic

development into a co-equal (and in practice an overriding) purpose of conservation management, rather than a consideration that must remain subordinate to it. This lessens the protection of conservation land and erodes good public stewardship, potentially leaving treasured conservation land vulnerable to the whim of the government of the day.

Conservation legislation should clearly establish that protecting and restoring biodiversity and ecological integrity remains the Department's overriding objective. Conservation legislation exists precisely because Parliament has previously judged that some values are not well served through a commercial lens. Economic activity should be enabled where it demonstrably supports, or at minimum does not undermine, those outcomes—not become a co-equal purpose of the Department itself. We recommend that the Department of Conservation's statutory functions should remain centred on protecting and restoring New Zealand's natural heritage, while continuing to provide for appropriate public use and commercial activity through a robust concessions framework, and that all proposed changes to clause 6 are removed.

Properly valuing nature

A recurring problem underlying this debate is that New Zealand has no robust, consistent way of weighing the economic value of an intact ecosystem, its cultural significance, or importance of public access against the economic value of developing it. Conservation land delivers water regulation, soil stability, carbon storage, biodiversity resilience, recreation and cultural value - benefits that are real but rarely priced, and therefore easily discounted next to a dollar figure for development.

The Opportunity Party's environmental policies seek to correct this market failure by recognising nature as a form of national capital that underpins both environmental wellbeing and long-term economic prosperity.

The Conservation Amendment Bill misses an opportunity to embed this principle. Instead of strengthening the role of natural capital in conservation decision-making, it places greater emphasis on facilitating development while simultaneously weakening some of the institutional safeguards that have historically protected public conservation land.



We recommend the Bill or its associated National Conservation Policy Statement require an explicit natural capital assessment (covering ecological, recreational and cultural value) alongside any economic assessment, for proposals involving disposal, exchange, or significant development of conservation land. This is the only way to ensure "economic opportunity" is judged against a true and comparable measure of what would be lost, rather than against nothing at all.

Preserve the public voice in conservation decision-making

The Bill significantly changes decision-making arrangements across conservation management, including decisions on concessions, land exchanges and disposals, policy settings, and planning approvals. At the same time, it reduces the role of the New Zealand Conservation Authority and Conservation Boards, moving these bodies away from meaningful oversight and towards largely advisory functions.

Opportunity believes this weakens an important system of checks and balances. Public conservation lands and waters belong to all New Zealanders, and decisions about their future should not rest solely with the Minister of the day. Increasing Ministerial discretion creates a risk that decisions become driven by short-term political priorities rather than long-term stewardship of nature. It also reduces transparency and accountability in how decisions about public conservation land are made.

The Bill also significantly limits opportunities for public participation. Public conservation land is a shared national taonga held in trust for future generations, and New Zealanders should have a meaningful say in how it is managed. However, these changes narrow the circumstances where concession applications must be publicly notified. Mandatory notification would largely be limited to leases and longer-term licences, with many other proposals left to Ministerial discretion. This creates a real risk that activities with potentially significant environmental effects could proceed without public awareness or scrutiny.

The proposed exemptions from notification - including renewals and extensions of existing concessions, grazing licences, or applications the Minister considers "unlikely to grant" - are particularly concerning. Environmental impacts often build over time, and existing activities

can become more intensive or damaging. Removing opportunities for public input risks allowing cumulative harm to occur without proper oversight.

Opportunity recommends:

- Retaining meaningful roles for the New Zealand Conservation Authority and Conservation Boards;
- Requiring public notification for all proposals that may have more than minor impacts; and
- Restoring the right for submitters to be heard, particularly for significant or contested proposals.

Treaty obligations should be strengthened, not narrowed

New Zealand's conservation system should give practical effect to Te Tiriti o Waitangi and recognise the essential role that iwi and hapū play as kaitiaki of our natural environment. Many of New Zealand's most successful conservation initiatives have been built on enduring partnerships between the Crown, tangata whenua, local communities and the wider conservation sector.

Opportunity supports efforts to improve clarity around how Treaty obligations are implemented in conservation legislation. Greater certainty can improve consistency, transparency and accountability for both the Department of Conservation and Treaty partners.

However, clarification must not weaken the substantive obligation contained in section 4 of the Conservation Act. The Bill's attempt to "clarify" the Crown's obligations to iwi may, in practice, codify a narrower standard than that established through Treaty settlements and case law. Any change in this area must enhance (and certainly not diminish) the Crown's duties in regards to existing settlement commitments and Te Tiriti jurisprudence, and must be developed in genuine partnership with affected iwi and hapū.



We are also concerned that the Bill gives the Minister broad discretion over whether and when to engage with iwi and hapū on concession applications. Effective partnership requires engagement that is early, meaningful and adequately resourced.

Strengthening Māori participation is not simply a matter of meeting constitutional obligations. It is also good conservation policy. Māori leadership, local knowledge and long-term stewardship contribute to healthier ecosystems, more resilient landscapes and better environmental decision-making.

Opportunity recommends:

- Ensuring amendments to section 4 maintain or strengthen the practical effect of the Crown's Treaty obligations rather than narrowing them;
- Requiring early, meaningful and appropriately resourced engagement with affected iwi and hapū on concession applications and other significant conservation decisions; and,
- Supporting greater opportunities for collaborative conservation management where these improve long-term environmental outcomes.

Conclusion

The Opportunity Party supports a Conservation Act that is efficient to administer and open to sensible development. What we cannot support is a Bill that quietly repositions economic development as equal to conservation in the Act's purpose, while leaving the safeguards against misuse of that power advisory rather than statutory.

We do not support this Bill in its current form, and recommend substantive amendments are made to:

- Retain the primacy of conservation purposes in the Act, and remove the requirement to enable economic development "to the greatest extent practicable."
- Require that economic opportunity be considered only as subordinate to, and consistent with, conservation outcomes - not as a co-equal purpose.



- Require a natural capital assessment, on equal footing with any economic assessment, for proposals involving disposal, exchange or significant development of conservation land.
- Retain support for the streamlining of the management planning and concessions framework, where this improves efficiency without weakening the protections above.
- Ensure any change to how the Act gives effect to Treaty principles strengthens rather than narrows existing obligations, in genuine partnership with iwi and hapū.
- Require public participation and impact assessment to remain meaningful, not merely procedural, for significant decisions affecting conservation land.