



# The Conservation Amendment Bill - A submission by the Hutt Valley Tramping Club

30 June 2026

## Who we are

The Hutt Valley Tramping Club (HVTC) is based in Lower Hutt and has approximately 270 members. Established in 1923, its primary purpose is to foster tramping and other outdoor pursuits for its members.

The members of the HVTC recognise that conservation of all our ecosystems, fauna, flora and natural areas is essential to ensure that our natural environment can survive for present and future generations. In this respect two related objectives are included in our Constitution. These are:

1. To support the setting aside for recreational use places of scenic beauty and interest as national parks, forest parks, and reserves of all descriptions.
2. To protect native flora and fauna and the natural features of the country and to foster an awareness of and advocate for environmental issues affecting outdoor recreation.

## Preamble

HVTC is fully aligned with stated purpose of the Conservation Act 1987 in its present form: **“An Act to promote the conservation of New Zealand’s natural and historic resources, and for that purpose to establish a Department of Conservation.”**

We have noted with concern that a number of changes are proposed in the Conservation Amendment Bill (the Bill) that directly conflict with this stated purpose. These are:

1. The inclusion of an economic opportunities requirement which
  - a. has been introduced into the Bill after the public consultation period in 2025 thus preventing public input,
  - b. is in direct conflict with the conservation objective, and
  - c. is weighted at a higher level of importance to conservation
2. All decision-making power is highly centralised with the Minister. The proposal to downgrade the functions of the Conservation Authority to advisory only and to mostly remove public consultation opportunities may indeed seem a way to streamline the planning process. However, it also removes independent oversight and could increase public perception of political interference.
3. There are proposals to expand the amount and simplify the process of disposal of conservation land. The measures to determine the suitability of disposal of this land are sufficiently wide to include a large percentage of what clearly was previously considered prime conservation land. It is hopeful that recent media reports quoting the Minister in which he states that these clauses will be amended are accurate.

## Comments

The following table isolates some of the issues mentioned in the points above:

#	Bill Amendment	HVTC Position	HVTC Comment	HVTC Recommendation
1	New section 6(ea) Functions of the Department	Strongly Oppose	<ul style="list-style-type: none"> <li>It is concerning that the inclusion of “economic opportunities” was never mentioned in the public consultation documents last year. The public therefore never had an opportunity to consult until this late stage.</li> <li>Section 6(ea) is a dangerous shift away from the stated purpose of the Act (*see preamble (1) ). It seemingly conflates the purpose of conservation, which is to preserve the natural environment, with economic opportunities, which typically exploit the natural environment.</li> <li>The “economic opportunities” proposed (section 6(ea)) encompass a wide array of possible human-derived mechanisms, many of which could seriously and permanently damage the environment.</li> <li>In the Bill these economic opportunities are not required to be consistent with conservation values and are, in fact, given higher priority (“to the greatest extent practicable”) than recreation (section 6(e)) which is required to be only consistent with conservation values.</li> <li>It is therefore difficult to conceive how the Department of Conservation (DOC) can possibly interpret their function when dealing with such conflicting requirements.</li> </ul>	<p>Remove section 6(ea)</p> <p>Less acceptable option: Prioritise recreation and significantly narrow down the array of economic opportunities to only those specific commercial activities that are consistent with the conservation values.</p>
2	Amended Section 6B(1)(a)(b) Functions of Authority	Oppose	<ul style="list-style-type: none"> <li>The role of the Authority ensures an independent assessment of public conservation land and conservation matters.</li> <li>The need to consolidate and streamline conservation planning and policy processes is understandable.</li> <li>By reducing the Authority’s powers to advisory only and centralising all decision-making in the hands of the Minister risks a perception by the public of political overreach.</li> <li>The Minister needs to demonstrate accountability and demonstrate the reasons for decisions.</li> </ul>	Add a clause to the effect that the Minister and DG are required to have particular regard to the NZCA advice on the NCPS and on area plans
3	New section 13H Area plans	Approve	<ul style="list-style-type: none"> <li>HVTC supports the concept of consolidation and simplification of management strategies and management plans into area plans. We would expect that this should improve the process of managing New Zealand conservation estate more</li> </ul>	N/A

			<p>efficiently.</p> <ul style="list-style-type: none"> <li>We do have serious reservations regarding some of the stated requirements to achieve this goal (items #4 - #7 below)</li> </ul>	
4	New section 13H Area plans	Oppose	<ul style="list-style-type: none"> <li>In drawing up area plans, none of the 13H subsections indicate a requirement to consult the users of that area or persons with local knowledge.</li> <li>Given the depth of knowledge, often built up over many years, it would seem sensible for the DG to be required to consult the public on this type of planning.</li> </ul>	Add a new section requiring draft plans and public consultation
5	New section 13D (2)(b) NCPS	Strongly oppose	<ul style="list-style-type: none"> <li>Inserting an economic opportunities imperative into a NCPS policy while using the term “to the greatest extent practicable” is both prescriptive and wide open to differing interpretation.</li> <li>It will effectively dilute the prime purpose of the Act (*see preamble) and, of more concern, it will result in ambiguity in policy direction.</li> </ul>	Remove section 13D(2)(b)  Less acceptable option: Clearly define limits and narrow down the range of economic opportunities to those that are clearly consistent with conservation values
6	New section 13E (2) NCPS classification exempt or pre-approved activities	Strongly Oppose	<ul style="list-style-type: none"> <li>This clause 13E(2) allows the Minister to ignore, and essentially negates, the purpose of the stipulations set out in 13E(1)(a)(b)(c).</li> <li>It makes no sense to set up two contradictory requirements.</li> <li>In the case of an unanticipated concessionary activity arising where the effects cannot be determined, a precautionary approach should always be taken and the concession refused.</li> <li>The Minister should always be fully satisfied that every exempt or pre-approved activity is consistent with 13E (1)(a)(b)(c)</li> <li>This clause is unnecessary.</li> </ul>	Remove the section 13E(2)
7	New section 13H (2)(b) Area plans	Strongly Oppose	<ul style="list-style-type: none"> <li>As per comments in #5, inserting an economic opportunities imperative into the area planning while using the term “to the greatest extent practicable” is inconsistent with conservation imperatives and wide open to differing interpretations.</li> <li>It will effectively dilute the prime purpose of the Act (*see preamble) and, of more concern, it will result in ambiguity in appropriate planning decisions.</li> </ul>	Remove section 13H (2)(b)  Less acceptable option: Clearly define limits and narrow down the range of economic opportunities to those that are clearly consistent with conservation values
8	New section 14R (1)(2)(3)(4) Public notifications of applications	Oppose	<ul style="list-style-type: none"> <li>It is illogical to have contradictory requirements: (subsections 1 &amp; 2) which state: “The Minister <u>must</u> publicly notify..” and then immediately undo it (subsections 3 &amp; 4) with the requirement “...The Minister <u>may</u> publicly notify..”.</li> <li>To avoid any public perception of political interference in the granting of concessions, it is essential that public notification is always mandatory.</li> </ul>	Remove subsections (3) & (4) from section 14R

9	New section 15A(1) Land Exchanges	Oppose	Comments removed after media reports by the Minister	
10	New section 15K (1)(a) (1)(b) Minister may dispose of land	Oppose	Comments removed after media reports by the Minister	

Marina Skinner

President