

25 June 2026

Submit via [Conservation Amendment Bill Submission - New Zealand Parliament](#)

## SUBMISSION TO THE ENVIRONMENT SELECT COMMITTEE ON THE CONSERVATION AMENDMENT BILL

Thank you for the opportunity to present this submission on the Conservation Amendment Bill (the Bill).

The Queenstown Lakes District Council (QLDC) is broadly supportive of changes to the conservation management system that will make it more responsive, efficient and easier to engage with. QLDC also considers it appropriate to enable more funding to be directed towards conservation through mechanisms such as charging international visitors to access popular conservation sites. However, QLDC has concerns over the following parts of the Bill:

- Proposed changes to the purpose of the Act (Section 6(ea)) which gives primacy to the economic use and development of natural and historic resources, rather than their conservation and preservation for the benefit of present and future generations.
- Proposed reduction in the functions of New Zealand Conservation Authority and Conservation Boards to advisory only (Sections 6B and 6M), transferring powers to the Minister, thereby reducing independent oversight and public accountability.
- Proposed changes to Subpart 6 – Part 3B to allow for the exchange or disposal of Public Conservation Land (PCL). There should remain a very high threshold for exchange of conservation land since no two pieces of land will have commensurate values. In principle, QLDC is opposed to the disposal of PCL.

Specific recommendations made in the submission are:

- Any amendments to the Act should retain the primary purpose of conservation and preservation of natural and historic resources for current and future generations. Any reference to economic use and development should be subordinate to conservation outcomes.
- Sections 6B (functions of the NZCA) and 6M (functions of Conservation Boards) are amended to retain independent oversight and public accountability whilst enabling an effective and efficient conservation management planning framework.
- Ensure ongoing restrictions on the disposal of PCL (as in the current Act).
- Ensure robust checks and balances are implemented on any land exchanges under the Bill to ensure conservation benefits are significant and measurable.
- When setting the international visitor access levy for conservation areas, careful consideration must be given to balance the value of these areas with other fees and charges international visitors may incur to ensure this does not adversely affect conservation outcomes, or Aotearoa New Zealand as a visitor destination.

QLDC would not like to be heard at any hearings that result from this consultation process.

Thank you again for the opportunity to comment.

Yours sincerely,



Pennie Pearce  
Strategy & Policy General Manager

## SUBMISSION TO THE ENVIRONMENT SELECT COMMITTEE ON THE CONSERVATION AMENDMENT BILL

### 1.0 Context of the Conservation Amendment Bill in relation to QLDC

- 1.1 People are drawn to Aotearoa New Zealand and to the Queenstown Lakes District (QLD) to live, visit and recreate because of its spectacular wilderness and alpine environments. The district has an average daily population of 81,660 (visitors and residents) and a peak daily population of 122,490. By 2055 this is forecast to increase to 147,518 and 221,276 respectively<sup>1</sup>.
- 1.2 Public Conservation Land (PCL) provides protection for, and connections between indigenous ecosystems which in turn provide habitats for indigenous flora and fauna, help regulate water flows, filter pollutants, stabilise erosion-prone areas, and sequester carbon. The importance of protecting and enhancing the natural environment is central to QLDC's Climate and Biodiversity Plan<sup>2</sup>.
- 1.3 PCL is also central to the district's identity, cultural values and local economy. PCL makes up over 50% of the QLD land area, excluding National Parks and Wilderness Areas. The visitor economy, as the largest contributor to the local economy, relies heavily on the protection of wild and open spaces and conservation of indigenous flora, fauna and ecosystems. In 2025, tourism accounted for 32.4% of GDP and 36.3% of all employment in the district<sup>3</sup>.
- 1.4 PCL in the district is highly valued by the community for both conservation and recreation. This is reflected in the many community conservation initiatives on PCL such as weed control, restoration planting and pest predator trapping. There are over 70 community groups undertaking more than 175 projects across the district, a lot of which is on PCL. Much of the district's extensive trail network also traverses PCL.
- 1.5 Increasing visitor numbers, growth of the tourism economy and high residential growth creates demand pressure on the PCL which must be carefully managed. Many areas of PCL in the district are easily accessible providing opportunities for community conservation volunteering, recreation and wellbeing. Examples of well-known locations that are PCL (stewardship land, conservation park or scenic reserve) that adjoin urban areas or are easily accessible include The Remarkables Conservation Area, Ben Lomond Scenic Reserve, parts of Lake Whakatipu and Lake Wanaka foreshores, Tuckers Beach Wildlife Management Reserve, Glenorchy Lagoon Conservation Area, and Slope Hill Recreation Reserve at Lake Hayes.
- 1.6 QLDC, Lake Wānaka Tourism and Destination Queenstown developed a Regenerative Tourism Plan<sup>4</sup> for the district with input from Kāi Tahu and the Department of Conservation, as key actors in the tourism system. The Regenerative Tourism Plan aims to improve local and visitor wellbeing and experience, forging connections between people and places, and enabling healthy ecosystems, so that the district becomes known as a leading example of how travel creates a thriving future. Conservation of indigenous flora, fauna and ecosystems and the careful stewardship of PCL is vital to the district's and Aotearoa New Zealand's economy.
- 1.7 QLDC also has an Economic Diversification Plan,<sup>5</sup> which identifies industries that are integral to diversifying our local economy. Industries such as film, the outdoor economy and environmental enterprise also rely on the protection of wild and open spaces. QLDC's in-house film office estimates that over a third of the filming activity in the district takes place on PCL.

---

<sup>1</sup> <https://www.qldc.govt.nz/community/population-and-demand>

<sup>2</sup> Climate & Biodiversity Plan 2025-2028: [https://climateaction.qldc.govt.nz/media/2lidsbpx/qldc\\_climate-and-biodiversity-plan.pdf](https://climateaction.qldc.govt.nz/media/2lidsbpx/qldc_climate-and-biodiversity-plan.pdf)

<sup>3</sup> Infometrics Regional Economic Profile Queenstown-Lakes District (2025)

<sup>4</sup> Travel to a Thriving Future: <https://www.regenerativetourism.co.nz/>

<sup>5</sup> New pathways to a thriving future: [queenstown-lakes-economic-diversification-plan\\_final.pdf](https://www.qldc.govt.nz/media/2lidsbpx/queenstown-lakes-economic-diversification-plan_final.pdf)

## 2.0 The Conservation Act should retain the primary purpose of conservation and preservation of natural and historic resources for current and future generations

- 2.1 In reforming the conservation management planning system, it is important that the overriding priority is protecting and enhancing conservation and biodiversity. The proposed replacement of Section 6(e) with Section 6(ea) will require the Department of Conservation (DOC) to enable development of conservation land “to the greatest extent practicable”. This will change the key purpose of the Act giving primacy to the economic use and development of natural and historic resources, rather than their conservation and preservation for the benefit of “present and future generations”. It also requires DOC to balance conservation and economic outcomes, based on what is “most practicable”.
- 2.2 Similarly, the purpose of the new National Conservation Policy Statement (s13D) is to “recognise the 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 under those Acts.”
- 2.3 With many indigenous terrestrial species and ecosystems under threat<sup>6</sup>, these amendments weaken rather than strengthen New Zealand’s conservation system and remove the intergenerational commitment to protect these taonga.
- 2.4 QLDC therefore supports retaining the Act’s primary purpose of conservation and preservation of natural and historic resources for current and future generations, which are of significance to the district’s identity, cultural values, wellbeing and economy. Any weakening of this primary purpose is likely to have significant implications for the local economy which relies on the protection of these resources, and consequently for the national economy.

### **Recommendation:**

R.1. Any amendments to the Act should retain the primary purpose of conservation and preservation of natural and historic resources for current and future generations. Any reference to economic use and development should be subordinate to conservation outcomes.

## 3.0 Streamlining of the management planning framework should retain independent oversight and public accountability

- 3.1 QLDC is broadly supportive of streamlining and modernising the conservation management planning framework to make it more responsive, efficient and easier to engage with. The development of a National Conservation Policy Statement and a single layer of area plans will create consistency and simplify the system, however, there should continue to be a strong role for the New Zealand Conservation Authority (NZCA) and Iwi.
- 3.2 The proposed removal of some functions of the NZCA and Conservation Boards is of concern. Proposed amendment of Section 6B (functions of the New Zealand Conservation Authority) and Section 6M (functions of Conservation Boards) reduce these agencies’ role to advisory only. Whilst the Minister is required to consider the advice, they are not required to follow the advice.
- 3.3 These amendments remove oversight, technical expertise and rigour in the process. They also remove genuine engagement opportunities with these bodies, and the entities that their members represent. QLDC supports an effective and efficient conservation management planning framework that retains or strengthens independent oversight and public accountability.

---

<sup>6</sup> Ministry for the Environment & Stats NZ (2025). New Zealand’s Environmental Reporting Series: Our environment 2025 | Tō tātou taiao: <https://environment.govt.nz/assets/publications/our-environment-2025.pdf>

**Recommendation:**

R.2. Amend Sections 6B (functions of the NZCA) and 6M (functions of Conservation Boards) to retain independent oversight and public accountability whilst enabling an effective and efficient conservation management planning framework.

**4.0 Existing PCL should be protected, and there should be a very high threshold for exchange of conservation land**

- 4.1 The Bill seeks to remove some of the existing constraints on exchanging and disposing of Crown-owned conservation land. Whilst there is a list of exempted categories in the Bill (new Schedule 5), including places like Wilderness Areas and National Parks, there remain large areas of PCL, some with very high conservation values, that could be subject to disposal.
- 4.2 Under replacement of Subpart 6—Part 3B (Section 15K) the Minister would be permitted to dispose of land, if it is not important for the conservation of threatened species or threatened ecosystems or if it is not the best example of indigenous vegetation or habitat for indigenous species. This means that indigenous species or ecosystems that are 'At Risk', or 'Data Deficient' could lose the protection of PCL. Overall, a reduction of conservation estate is likely to also result in worsening conservation outcomes over time.
- 4.3 For these reasons, QLDC does not consider that the conservation system, or Aotearoa, New Zealand as a whole will benefit from enabling disposal of a wider range of PCL. QLDC considers that even land with no or low conservation value, still has value as public land.
- 4.4 Under replacement of Subpart 6—Part 3B the Bill also proposes to enable more permissive exchange of PCL. Conservation land could be exchanged for other land if the Minister decides that the land provides "net conservation benefit". This is defined as "the natural resources and historic resources of the incoming land are assessed as being greater than those of the outgoing land." However, no two pieces of land are the same, and the assessment of net conservation benefit is potentially subjective without the checks and balances of the current system.
- 4.5 The Bill does not take recreation values into account when enabling exchange or disposal of PCL. This could affect existing and future public access to PCL which will be detrimental to the QLD community.
- 4.6 Greater clarification is needed on how land would be determined to be suitable for exchange, with a rigorous test to demonstrate significant net conservation benefit, and public consultation before exchange of PCL is approved.

**Recommendation:**

R.3.1 Retain the restrictions on the disposal of PCL in the current Act.

R 3.2 Ensure robust checks and balances are implemented on any land exchanges under the Bill to ensure significant conservation benefits.

**5.0 Support for more funding to be directed towards conservation**

- 5.1 With the shift to regenerative tourism, QLDC considers it appropriate to ask international visitors to contribute to the conservation sites they visit through user charges (new Section 11). QLDC views that the majority of revenue generated from user charges should be allocated to the region in which revenue is raised, with the remainder for high priority conservation work that requires funding.
- 5.2 However, in setting the international visitor access levy there must be a careful consideration of international visitors' ability to pay considering other expenses and charges they may incur to visit New Zealand or for conservation experiences. It is equally important to not undersell or underestimate how much visitors will spend to access conservation sites.

**Recommendation:**

R.4. The majority of revenue generated from user charges should be allocated to the region in which revenue is raised, with the remainder for high priority conservation work that requires funding.

R.5 In setting the international visitor access levy for conservation areas, careful consideration must be given to balance the value of these areas with other fees and charges international visitors may incur, to ensure this does not adversely affect conservation outcomes, or Aotearoa New Zealand as a visitor destination.