

Proposals to modernise the conservation system

Department of Conservation

Climate Justice Taranaki submission, 28 February 2025

1. Founded in 2010 and incorporated in 2015, Climate Justice Taranaki (CJT) ¹ is dedicated to environmental sustainability, social justice and inter-generational equity - our collective ethical responsibility to current and future generations, human and non-human. Our vision is founded on, and underpinned by, Te Tiriti o Waitangi, Aotearoa New Zealand's constitutional document.
2. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions. CJT has submitted on many consultation papers, policies and Bills over the past decade².
3. CJT is very concerned about the government's push for an increasingly utilitarian approach to managing Aotearoa's public conservation land, as demonstrated by Department of Conservation (DOC)'s two discussion documents: *Modernising conservation land management* ³ and *Exploring charging for access to some public conservation land*⁴ under consultation.

Modernising conservation land management

4. "*The Government wants to streamline conservation management planning...*" The repeated use of the word 'streamline' rings all the alarm bells associated with the highly controversial Fast Track Approvals process opposed by numerous experts, Māori organisations, local councils and environmental groups⁵.
5. The proposal would result in huge concentration of power, as the Minister of Conservation would both initiate and approve National Conservation Policy Statement. The advisory role of the NZ Conservation Authority would be removed, along with independent oversight essential for evidence-based planning and management. There is a heavy focus on 'speeding up' concession processing and 'unlocking' amenities areas, without clear conservation principles and priorities. As such, conservation policies would be politicised and prone to corporate lobbying, further eroding DOC's purpose and ability to protect and restore indigenous biodiversity and ecosystems.
6. It is clear from the discussion document that the intrinsic value of conservation land is being undervalued. The proposal would make it easier to exchange / dispose of conservation land, by reversing the Ruataniwha Supreme Court decision (2017)⁶ which would have devastating implications. The idea of 'surplus' conservation land is disturbing, given the declining state of Aotearoa's biodiversity and perilous situation of many indigenous species and ecosystems. The idea of 'net conservation benefit' is absurd when the lost values are not being considered.
7. Critically, stewardship land, although not allocated an official status, includes many areas of high conservation values. There is a real danger that some of these high value conservation lands would be lost to mining and other commercial development, under the current neo-liberal driven regime of the government.
8. In 2022 at the 15th Conference of Parties to the UN Convention on Biological Diversity, Aotearoa NZ along with others, signed onto the Kunming-Montreal Global Biodiversity Framework (GBF)⁷. The GBF encompassed 4 goals and 23 targets by 2030; including conservation of 30 percent of land, sea and inland waters, restoration of 30 % of degraded ecosystems, halting species extinction, halving the

introduction of invasive species, and enhancing biodiversity and sustainability in agriculture, fisheries and forestry. DOC's proposal goes against these, and despite the intrinsic, ecosystem services and economic values of our conservation land⁸ and nature more broadly⁹.

Exploring charging for access to some public conservation land

9. We support some form of access charging to some public conservation land. But it must be done without exposing such land to overuse with adverse impacts on biodiversity and the environment or displacing existing government funding which is already grossly inadequate. The lure of income must not compromise conservation principles. In some cases, a cap on daily visitors may be necessary to retain or restore the conservation values of the sites, as long as Māori access is prioritised.
10. Recent work by DOC concluded it would need \$2.3 billion each year for threatened species and ecosystem protection, yet the government provides DOC with only around \$650 million each¹⁰. Observing how this coalition government has brutally cut funding for environmental¹¹, science¹² and conservation^{13, 14} work, it is difficult to see any genuine motive for improving conservation outcomes.
11. We agree with the proposed objective to ensure equity in any charging schemes, and to support Māori's ability to exercise kaitiakitanga, tikanga and other cultural practices and responsibilities.
12. Of the three options of charging, we support only charging international visitors, including visitors from Australia, say \$30 to each site and raise \$52m p.a. This would be the most equitable way in our opinion.
13. It may be useful to consider increasing tour operator levies or other kinds of contributors. For all other visitors, encourage and provide easy ways of voluntary donation and/or in-kind contributions. Lots of tramping clubs and other groups already do volunteer work like hut maintenance, trap lines, and do so willingly. Some kind of recognition for contribution such as issuing 'Honourable parks passes' or badges for regular contributors maybe encourage new volunteer to partake.
14. On access-charging revenue, we prefer that it be invested in evidence-based priority conservation projects, regardless of where it is collected. In particular, resources will be needed to deal with increasing risks and impacts from the changing climate on biodiversity and extreme weather events on infrastructure.

¹ <https://climatejusticetaranaki.info/>

² <https://climatejusticetaranaki.info/submissions/>

³ <https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2024/modernising-conservation-management/modernising-conservation-land-management-discussion-document.pdf>

⁴ <https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2024/access-charging/exploring-charging-for-access-to-some-public-conservation-land-discussion-document.pdf>

⁵ <https://www.rnz.co.nz/news/in-depth/536978/how-the-fast-track-approvals-bill-became-law>

⁶ <https://www.sciencemediacentre.co.nz/2017/07/06/supreme-court-denies-ruataniwha-dam-appeal-news/>

⁷ <https://www.unep.org/resources/kunming-montreal-global-biodiversity-framework>

⁸ <https://www.thepress.co.nz/nz-news/360507694/conservation-budget-would-need-dramatic-increase-save-all-species>

⁹ <https://wwwf.org.nz/sites/default/files/2024-11/A%20Nature%20Positive%20Aotearoa.pdf>

¹⁰ Forest and Bird slides for 'The Future of Conservation Land Webinar', 12 Feb 2025.

¹¹ <https://www.1news.co.nz/2024/04/08/job-cuts-environment-ministry-seeks-voluntary-redundancies/>

¹² <https://www.rnz.co.nz/national/programmes/middayreport/audio/2018946212/warnings-over-job-cuts-to-science-sector>

¹³ <https://www.rnz.co.nz/news/national/513924/departments-of-conservation-proposes-130-job-cuts>

¹⁴ <https://www.doc.govt.nz/news/issues/budget-2024-overview/>