

Submission on the Conservation Amendment Bill

To: The Environment Select Committee

From: Stet Limited

15 June 2026

1. Introduction

Stet Limited thanks the Environment Select Committee for the opportunity to submit on the Conservation Amendment Bill. Stet Limited actively supports restoration, conservation, and ecological protection projects across Aotearoa New Zealand. While we support sensible, practical modernisations of administrative processes that improve the operational efficiency of the conservation system, we strongly oppose the Bill in its current form. Our overriding concern is that this legislation represents a fundamental, highly damaging paradigm shift. By legally elevating commercial imperatives over ecological preservation, the Bill treats public conservation land—which covers 33% of our country—as an economic resource to be exploited rather than a sacred living network held in trust for future generations.



Mt Heal on Aotea / Great Barrier Island. Photo by Shaun Lee.



Kauri dieback. Photo by Shaun Lee.

2. The Core Threat: Clause 6 and the Overturning of Conservation Primacy

The most alarming aspect of this Bill is the amendment to Section 6 of the Conservation Act. The introduction of the new function under Clause 6(ea) tasks the Department of Conservation (DOC) with a mandate to:

"...recognise the economic opportunities that arise from the use and development of land and other natural resources... and to enable this use and development to the greatest extent practicable..."

This function is not qualified by a requirement to be *"consistent with conservation"*. Because the Conservation Act lacks an overarching, separate purpose provision, inserting an economic exploitation mandate into DOC's core functions completely alters the intent of the Act.

With our unique native species already facing an unprecedented extinction crisis, emerging threats like climate change will only make survival harder for them. Forcing nature to absorb expanded commercial development during this climate and biodiversity crisis makes this Bill a dangerous step in the wrong direction.

Currently, environmental protection relies on maintaining ecosystems *"so far as is practicable"* in their natural state. Introducing a directive to enable development *"to the greatest extent practicable"* forces a legal balancing act where none should exist. Nature cannot defend its own boundaries when the state's primary conservation guardian is statutorily ordered to maximize commercial potential.

This is a direct violation of the Rights of Nature. A forest, a wetland, or a river possesses an inherent right to exist, persist, and regenerate. Legally forcing a conservation agency to hunt for *"economic opportunities"* within a protected ecosystem treats that ecosystem as property to be consumed, rather than a living entity with its own intrinsic value.

The Fix: Amend Clause 6(ea) to explicitly subordinate all economic opportunities to ecological survival, or delete the clause entirely to maintain the absolute primacy of conservation.

3. Devaluing the Living Whole: Secondary Legislation and Concessions

The economic bias introduced in the core functions severely distorts the proposed secondary planning instruments and concession frameworks:

- National Conservation Policy Statement (NCPS) & Area Plans: Clauses 15 (proposed sections 13D(2)(b) and 13H(2)(b)) replicate the economic development language as an exclusive purpose for these new planning tools. By listing commercial advancement explicitly while omitting direct conservation mandates within the purpose clause, the Bill effectively prevents these regional plans from establishing absolute environmental guardrails.
- The Concessions Loophole: Clause 23 (proposed section 14) structures the new concessions framework around giving the Minister one-sided discretion to enable commercial use to its maximum "practicable" limit. Without rigid ecological limits, nature is stripped of its voice, leaving unique habitats vulnerable to cumulative degradation from commercial operations.
- The Fix: Delete proposed sections 13D(2)(b), 13H(2)(b), and 14(1) from the Bill. Economic activities on public conservation land must only ever be treated as exceptional, highly regulated concessions, never as a foundational purpose of conservation planning.



Clear-felling and heavy earthworks from logging operations on land adjacent to the public estate. Photo by Shaun Lee.



Tititipounamu / Rifleman. Photo by Shaun Lee.

4. The Commodification of Land: Disposal and Land Swaps

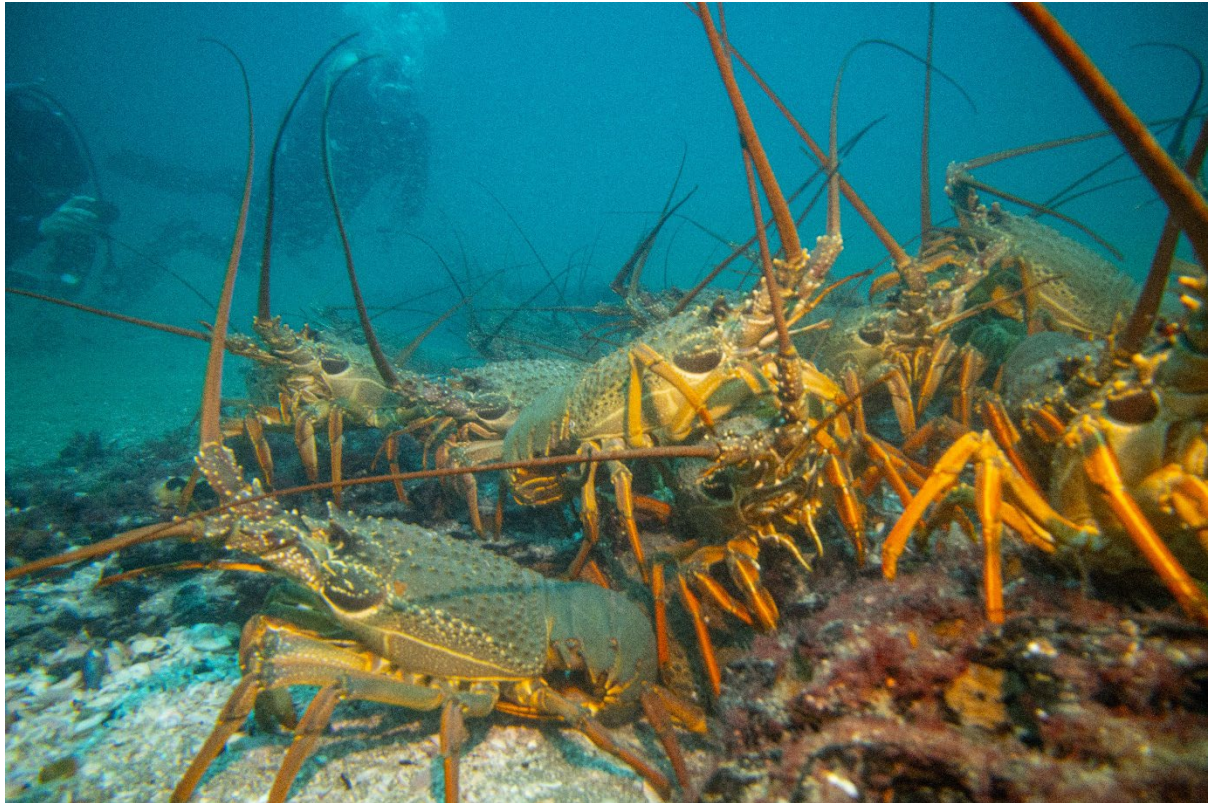
The Bill severely weakens the legal thresholds required to sell ("*dispose of*") or swap ("*exchange*") public conservation land, putting roughly 60% of the entire conservation estate at risk.

Currently, conservation land can only be sold if it possesses little to no conservation value. The Bill introduces a far weaker test, protecting only specific "threatened" species or rare habitat types, while opening up highly valued ecosystems—such as West Coast podocarp forests and high-country tussock—to commercial acquisition.

Furthermore, the new concept of allowing land exchanges based on a "*net conservation benefit*" is deeply flawed. This framework assumes that ecosystems are modular and tradable—that a corporate entity can destroy an ancient, irreplaceable ecosystem in one area if they purchase and logistically "*offset*" it with an easily accessible, distinct piece of land elsewhere.

An ecosystem is an interconnected, living whole; its right to life cannot be traded away like stock on a balance sheet.

The Fix: Retain the current strict restrictions on land disposal and remove the "*net conservation benefit*" exchange framework. Safeguards must prevent the permanent, irreversible loss of public conservation assets to private interests.



Packhorse rock lobster in the sand mine proposed for Bream Bay under a Fast-Track application. Photo by Shaun Lee.

5. Part of a Wider Erosion of Nature's Safeguards

This Select Committee must view this Bill not in isolation, but as part of a highly coordinated, systemic rollback of environmental safeguards across New Zealand. When combined with the *Fast-Track Approvals Amendment Act 2025*, the *Natural Environment Bill*, and the dismantling of dedicated environmental oversight bodies, this represents a severe regression in our national stewardship.

By centralising sweeping powers within executive Ministers and simultaneously cutting out independent bodies (like the New Zealand Conservation Authority) and public participation, the Bill silences the human guardians (*kaitiaki*) who speak on behalf of the natural world.



Forest gecko. Photo by Shaun Lee.

6. Summary of Requested Changes

To protect our natural capital, honour our collective stewardship obligations, and respect the inherent rights of Aotearoa's ecosystems to exist free from structural exploitation, Stet Limited requests the following amendments:

- Remove or heavily amend Clause 6 to delete the mandate requiring DOC to enable economic development "to the greatest extent practicable".
- Delete proposed sections 13D(2)(b), 13H(2)(b), and 14(1) to strip the commercial development mandates from the National Conservation Policy Statement, Area Plans, and the Concessions Framework.
- Reject the weakened "net conservation benefit" land swap model and maintain ironclad restrictions against the disposal or privatization of high-value ecosystems.
- Reinstate and defend independent statutory oversight and broad public submission rights to ensure local communities and environmental defenders can advocate effectively for the land.

We urge the Committee to defend the core principle of our conservation estate: nature is a living, vulnerable stakeholder that holds the right to remain wild, intact, and protected in perpetuity.

Stet Limited does not wish to speak to the Select Committee regarding this submission. We decline to appear because we have no confidence that the Committee is genuinely listening to public or scientific feedback, given that the democratic process on these environmental rollbacks appears entirely captured by short-term corporate interests.

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