



NZDA

New Zealand Deerstalkers Association

NZDA Written Submission to Environment Select Committee

on

Conservation Amendment Bill

1 July 2026

To: Committee Secretariat
Environment Committee
Parliament Buildings
Wellington

Submitted by the online portal

Date: 1 July 2026

Prepared by: Gwyn Thurlow, Chief Executive and General Counsel, Richard Wells, Access Committee Chair, Demelza Drake, Access Committee Member

Contact information:

E: info@deerstalkers.org.nz

P:(04)499 6163

3 Collina Terrace, Thorndon, 6011, Wellington

INTRODUCTION

The New Zealand Deerstalkers Association (NZDA), representing 13,500 members, 35,000 supporters, and approximately 85,000 recreational big-game hunters, submits this written submission on the Conservation Amendment Bill (Government Bill 309–1).

Background to NZDA

Since 1937, NZDA has safeguarded the traditions of ethical hunting, championed unfettered public access to New Zealand's backcountry, and bolstered conservation through game management, pest control and trapping, and volunteer work on our huts and tracks. NZDA is a strong advocate for the recreational value and use of our public land.

Our fundamental purpose is twofold: to ensure the traditions and rights of recreational hunters are protected, advanced, and advocated for in the best interests of sportsmen and sportswomen, and to serve as the national body representing and advocating on behalf of recreational hunters.

Our objectives include preserving and advancing recreational hunting, bushcraft, and shooting; fostering native flora and fauna conservation; supporting public access to mountains, bush, and wild country; and opposing commercial exploitation of New Zealand's wildlife, public lands, and natural resources where it jeopardises public usage or sound conservation practice (NZDA Core Policy).

Below, we outline our key policy positions, which shape our submission:

- We oppose the commercial exploitation of New Zealand's wildlife, public lands, and natural resources wherever and whenever such activity is deemed to jeopardise, exclude, restrict, or conflict with public usage of, or access to New Zealand's wildlife, public lands or natural resources, or where commercial exploitation is contrary to sound conservation practice or the interests of the sport or recreational hunters' interests.
- We support equitable access to recreational Public Conservation Land (PCL) and big game animal herds, including via ballots, to manage safety and user enjoyment and resist Crown land freeholding or privatisation (including, for example, forestry or other new use "partnerships") without retaining recreational access and big game management.
- We oppose the freeholding of Crown lands, including those held under pastoral lease or licence, unless all recreational land and wetlands, together with satisfactory hunting access, has been retained in Crown ownership.
- We maintain the principle of recreational use as of right for all outdoor sports men/women of all unoccupied land held by the Crown and other public bodies.

SUBMISSION POSITION

1. NZDA wishes to appear before the Committee to speak to this submission.
2. On balance, NZDA supports modernising conservation management where reform improves efficiency, clarity, conservation outcomes, public access, and the ability of New Zealanders to enjoy the public conservation estate.
3. NZDA supports practical improvements to DOC administration. We support faster and more consistent decision-making. We support appropriate visitor infrastructure in the right places. We do not oppose international visitors contributing fairly to the cost of high-use conservation infrastructure. We support better systems for managing concessions where those systems do not undermine conservation, public access, recreational hunting, or public participation.
4. However, NZDA does not support the Bill in its current form.
5. NZDA's concern is not with modernisation itself. Our concern is with the direction and cumulative effect of the Bill as drafted.
6. The Bill risks shifting the legal and policy balance of public conservation land away from conservation, public access, local participation and public recreation, and toward commercialisation, economic utilisation, centralised decision-making and reduced public oversight.
7. Public conservation land is not simply a departmental asset. It is not a land bank. It is not a revenue stream. It is not a commercial platform. It is a public estate held in trust for all New Zealanders.
8. Public conservation land exists for conservation, public access, public recreation, hunting, fishing, tramping, camping, climbing, caving, paddling, mountain biking, flying, food gathering, heritage, cultural connection, and future generations.
9. Commercial activity may be appropriate in some places and in some circumstances. NZDA is not opposed to tourism, visitor infrastructure, concessions, or commercial activity where they are carefully managed and clearly consistent with conservation and public recreation.
10. However, commercial use and development must remain subordinate to conservation, public access, public recreation, and the purposes for which the land is held. NZDA is deeply concerned that the Bill does not make that hierarchy sufficiently clear.

11. NZDA's principal concerns are:

- a. proposed new section 6(ea), which risks elevating economic use and development as a statutory function without adequate subordination to conservation, public access and public recreation:
- b. the land exchange and disposal provisions, which as introduced would expand the pool of conservation land potentially available for alienation from the public estate:
- c. visitor amenities areas, which may enable commercial precincts or semi-private enclaves within conservation land, including areas used for hunting and other public recreation:
- d. concession reforms, including longer leases, pre-approved activities, exempt activities and standardised conditions, which may make commercial activity easier without equivalent safeguards for existing recreational users:
- e. reduced public notification and hearing rights in important parts of the conservation planning and concessions framework:
- f. replacement of existing conservation management strategies and plans with a National Conservation Policy Statement and area plans, with the risk that hard-won local hunting, access, dog, vehicle, firearm, aircraft, hut and track provisions may be lost or diluted:
- g. hunting permit amendments, including the risk that hunting access may become dependent on future NCPS and area plan settings, and the risk of future fees for ordinary recreational hunting permits:
- h. lack of express recognition of recreational hunting as a legitimate public recreational use and conservation tool:
- i. lack of recognition of valued introduced species and the role of recreational hunters in game animal management: and
- j. the cumulative effect of this Bill alongside wider public land reforms.

12. NZDA also notes that it is likely to be one of the only national hunter organisations submitting on this Bill. It is therefore important that the Committee hear clearly from recreational hunters. Hunters are not merely users of public conservation land. Hunters are active participants in conservation. Hunters contribute to game animal management, goat control, pest control, wild animal population management, hut and track maintenance, conservation volunteering, public access advocacy, and hunter education.

13. Recreational hunters are also often among the public users most exposed to the cumulative loss of access. Hunting depends on large, connected, relatively undeveloped landscapes. Access can be lost not only by express prohibition, but also by land disposal, commercial concessions, visitor infrastructure, safety exclusion zones, aircraft or vehicle restrictions, dog restrictions, plan changes, or practical displacement by commercial activity.
14. The Bill does not directly remove New Zealanders' general right to access conservation land free of charge. However, NZDA submits that the Bill creates multiple pathways by which practical public access, recreational hunting and the non-commercial character of the conservation estate may be eroded over time.
15. If Parliament does not intend public conservation land to be treated as a commercial asset, land bank, or departmental revenue source, then the Act should say so. NZDA stands with other outdoor recreation organisations who have raised concerns about the Bill. Public conservation land is shared land. It is where New Zealanders hunt, tramp, fish, paddle, climb, cave, ride, fly, camp and connect with nature. The outdoor recreation sector's concern is not that conservation legislation should never change. The concern is that the Bill, as drafted, risks changing what public conservation land is for. NZDA submits that public conservation land is for conservation and public recreation first. Economic activity may occur only where it is compatible with those purposes. NZDA therefore asks the Committee to recommend substantial amendment to the Bill.
16. In particular, NZDA asks the Committee to:
 - a. remove the land exchange and disposal provisions:
 - b. redraft proposed section 6(ea):
 - c. expressly protect public access and public recreation:
 - d. expressly recognise recreational hunting as a legitimate public recreational use of conservation land:
 - e. protect ordinary recreational hunting permits from fees and unnecessary barriers:
 - f. preserve existing local hunting and access provisions during the transition to the NCPS and area plan system:
 - g. ensure visitor amenities areas cannot override the fundamental conservation and public recreation purposes of the land:

- h. ensure commercial concessions do not displace or exclude lawful recreational hunters:
 - i. retain meaningful public notification, submission and hearing rights: and
 - j. require decision-makers to consider recreational hunting, public access and practical access values in all relevant decisions:
17. NZDA supports reform, but not reform that weakens the public conservation estate. Public conservation land is a legacy inherited from previous generations. It should be managed so that future generations of New Zealanders continue to enjoy the same freedoms and opportunities that exist today.
18. NZDA states: Our public land is not for sale. It is not for commercialisation. It exists for conservation, public access, public recreation, hunting, food gathering, heritage and future generations.

Detailed Recommendations Made

NZDA asks the Committee to recommend the amendments set out below.

Land Exchange And Disposal

1. Minister's 29 June 2026 letter: NZDA welcomes the Minister of Conservation's 29 June 2026 advice to the Environment Committee that the Government no longer supports the land exchange and disposal provisions as currently drafted and prefers to retain the status quo legislative settings. NZDA also welcomes the Minister's acknowledgement that concerns about land exchange, disposal, and proposed new section 6(ea) have created public concern that the Bill could create an impetus for DOC to dispose of or exchange land in pursuit of financial gains. That acknowledgement is significant.
2. NZDA supports the Minister's position above, but NZDA wishes to note its position on this matter, that being: NZDA submits that the Committee should seek full removal of the land exchange and disposal provisions from the Bill.
3. NZDA further submits that Conservation land is a public asset held in trust for all New Zealanders. It should not be viewed as a land bank available for disposal or commercial exploitation whenever economic opportunities arise. The conservation estate provides irreplaceable opportunities for hunting, tramping, fishing, camping,

climbing, caving, paddling, flying, mountain biking, and other forms of outdoor recreation. Once public land is alienated from the conservation estate, public recreational opportunities may be permanently lost. NZDA's position is that public conservation land exists primarily for:

- conservation:
 - public access:
 - public recreation:
 - hunting, fishing, tramping and other lawful outdoor pursuits:
 - committee use and volunteering; and
 - heritage, cultural connection and intergenerational public benefit.
4. NZDA further submits that public conservation land does not exist primarily for sale, privatisation, commercialisation, or departmental revenue generation. Commercial activity may be appropriate in some places, but it must remain clearly subordinate to conservation, public access, and public recreation.

Proposed Section 6(ea): Economic Use and Development

1. NZDA is particularly concerned by the proposed new Departmental function to recognise economic opportunities arising from the use and development of land and other resources managed by the Department and to enable that use and development to the greatest extent practicable. NZDA accepts that some economic activity occurs on conservation land and can be appropriate where it supports conservation, public access, visitor safety, or public enjoyment. However, the proposed wording is too broad. It risks creating a statutory direction to enable commercial development without an adequate counterweight protecting conservation, recreation, public access, and the traditional non-commercial use of public conservation land. The phrase "to the greatest extent practicable" is particularly concerning. It creates a strong enabling direction. Unless qualified, it risks shifting the purpose of conservation land from public stewardship to economic utilisation. NZDA submits that the Bill must make clear that economic use and development may occur only where it is not inconsistent with conservation, public

access, recreational hunting, public recreation, and the purposes for which the land is held.

2. NZDA recommends that section 6(ea) be amended to provide:

“to recognise appropriate opportunities that arise from the use and development of land and other natural resources and historic resources managed by the Department, and to enable such use and development only where it is not inconsistent with conservation, public access, public recreation, and the purposes for which the land is held.”

3. NZDA further recommends that section 6 be amended to expressly recognise the Department's role in fostering public recreation, including recreational hunting, as a legitimate use of public conservation land.
4. Redraft proposed section 6(ea) so that economic use and development of land and resources managed by DOC is expressly subordinate to conservation, public access, public recreation, recreational hunting, and the purposes for which the land is held.
5. Remove or qualify the phrase “to the greatest extent practicable”.
6. Ensure that commercial use and development cannot become a competing or superior purpose of public conservation land.

Hunting Permits

NZDA wishes to specifically address the amendments to section 38 of the Conservation Act.

The Bill replaces section 38(1) and (2) and reallocates the power to issue hunting permits from the Director-General to the Minister. It also provides that a hunting permit may be issued where it is consistent with the NCPS, in accordance with the relevant area plan, and where the Minister has considered the safety of members of the public likely to be on that land or nearby land.

The Bill further provides that a permit may be issued on application or otherwise, and unconditionally or subject to any conditions the Minister thinks fit. If issued on application, the permit is deemed to be issued once the applicant completes the application, accepts the conditions, pays any prescribed fee, and the final requirement is fulfilled.

NZDA supports clarification that hunting permits may be issued online and efficiently.

DOC's current online hunting permit system is an important practical access mechanism for recreational hunters. It enables lawful, accessible, and low-cost public hunting across conservation land. NZDA supports retaining and improving that system.

However, NZDA has significant concerns about the broader implications of the amendment.

First, tying hunting permits to consistency with the NCPS and area plans means that any future weakening, omission, or removal of hunting access in those documents could directly affect the ability of hunters to obtain permits.

This reinforces the need for recreational hunting to be expressly recognised in the NCPS and area plans.

Second, allowing a prescribed fee creates a pathway for hunting permit charges.

NZDA opposes any fee for ordinary recreational hunting permits. Recreational hunters already contribute to conservation through game animal control, goat control, wild animal management, conservation volunteering, hut and track work, trapping, training, and licence and equipment costs.

A hunting permit fee would be a direct access charge on a public activity that supports conservation outcomes.

Third, the power to issue permits subject to any conditions the Minister thinks fit must be constrained by reasonableness, necessity, conservation, and for genuine public safety reasons.

Permit conditions should not be used to prefer commercial operators, displace ordinary hunters, impose unnecessary administrative barriers, or restrict lawful recreational hunting without evidence.

Fourth, the requirement to consider the safety of members of the public likely to be on nearby land must be applied carefully. Public safety is important. NZDA supports safe hunting. However, public safety must not become a vague justification for broad closures around commercial infrastructure, visitor amenities areas, accommodation, transport hubs, or concession activities.

Fifth, the transfer of power from the Director-General to the Minister centralises control. NZDA does not object to ministerial accountability in principle, but hunting permit decisions must remain practical, accessible, nationally consistent, and administratively simple.

NZDA recommends that:

1. online hunting permits remain free, accessible, and simple for recreational hunters;
2. the Bill should include a clear statement that nothing in section 38 authorises charging New Zealanders for ordinary recreational access to public conservation land.
3. recreational hunting permits not be subject to a prescribed fee;
4. if a fee power remains, the Act expressly provide that recreational hunting permits for New Zealand citizens and ordinarily resident New Zealanders may be prescribed at nil;
5. recreational hunting be expressly recognised in section 38 as a legitimate public recreational use of conservation land;
6. hunting permits must not be refused merely because commercial activity is occurring in the same general area;
7. permit conditions must be reasonable, proportionate, evidence-based, and necessary for conservation, public safety, biosecurity, access management, or lawful game animal management;
8. NZDA and the Game Animal Council be consulted before any regulations prescribing hunting permit fees or materially changing permit conditions;
9. the NCPS and area plans be required to identify and protect recreational hunting opportunities;
10. existing hunting access must be preserved during the transition to the new planning framework;

Visitor Amenities Areas

NZDA is concerned about the proposed new visitor amenities areas.

The Bill would allow the Minister to set apart areas within conservation land, including certain national park and reserve land, for recreational and public amenities and related services.

NZDA accepts that appropriate visitor infrastructure may be necessary in some high-use places. Toilets, carparks, visitor centres, huts, safety infrastructure and carefully managed accommodation can support public use and reduce environmental impact.

However, the visitor amenities area model goes much further.

Visitor amenities areas could enable accommodation, restaurants, cafés, carparks, visitor centres, transport services, guiding, equipment rental, merchandising, catering and other commercial operations.

NZDA is concerned that, if not tightly constrained, visitor amenities areas will create commercial precincts within public conservation land.

This is especially concerning where a visitor amenities area chapter can prevail over wider area plan provisions, and where the purposes or principles under which the land is held apply only so far as they are compatible with that authorisation.

That risks reversing the proper hierarchy. Commercial visitor development should fit within conservation purposes. Conservation purposes should not be watered down to fit commercial visitor development.

NZDA is also concerned that visitor amenities areas could create practical exclusion zones for hunting.

Accommodation, cafés, transport hubs, commercial guiding bases and other fixed assets may create new safety buffers, increased foot traffic, staff accommodation, vehicle activity, aircraft activity, and pressure to restrict firearm use or hunting in surrounding areas.

Over time, that could displace hunters from hunting areas even where there is no formal legislative ban on hunting.

NZDA recommends that:

1. visitor amenities areas be limited to genuinely high-use visitor sites:
2. visitor amenities areas not be used to commercialise open hunting areas:
3. visitor amenities areas be subject to full public notification and hearing rights:

4. recreational hunting, public access, and existing recreational use be mandatory considerations before an area is designated:
5. a visitor amenities area must not reduce existing hunting access unless necessary for demonstrable safety or conservation reasons:
6. public access must be maintained through and around visitor amenities areas:
7. commercial activity within visitor amenities areas must demonstrate a clear net public benefit:
8. visitor amenities area provisions must not override the core conservation purpose of the land:
9. there must be no private or semi-private enclaves on public conservation land: and
10. NZDA and affected recreational user groups must be consulted before any visitor amenities area is approved in an area used for hunting.

Concessions, leases, exempt activities and pre-approved activities

With regard to concessions, we submit that they should require and ensure that:

1. commercial concessions to be assessed for their impact on recreational hunting, public access, public recreation and the non-commercial character of conservation land.
2. major concessions and long-term leases to demonstrate a clear net public benefit.
3. public notification and hearing rights for significant concessions, long-term leases, visitor infrastructure, aircraft operations, commercial guiding operations, and activities affecting hunting areas.
4. pre-approved and exempt activity classes do not include activities that may materially affect recreational hunting, public access, firearm use, game animal behaviour, safety, or the recreational character of an area.
5. concessions do not confer exclusive or preferential use of public hunting areas unless expressly justified by a compelling public-interest reason.
6. concession conditions preserve public access unless restrictions are necessary, proportionate, evidence-based and publicly justified.

Public participation and independent oversight

NZDA is concerned that the Bill reduces meaningful public participation, including by removing Conservation Boards.

NZDA notes that hunters currently have no mandated seat on the Conservation Authority. This is a major defect. Other key stakeholders, such as Forest & Bird and Federated Mountain Clubs, have statutory seats. NZDA submits that it be provided with a Statutory Seat on the authority, reflecting that NZDA is the leading body representing recreational hunters in New Zealand.

Public consultation is not simply a procedural exercise. It is how local knowledge, recreational use, conservation concerns, and practical access issues are brought into decision-making. Hunters and other outdoor users often know places in a practical way that officials, concession applicants, and planners may not. The users know access points, informal routes, safety concerns, pressure points, and how proposed commercial activity will affect ordinary users.

NZDA is concerned by provisions that remove automatic hearing rights or reduce public notification requirements.

Written submissions alone are not enough for significant decisions affecting public conservation land. A hearing allows submitters to explain local context, answer questions, test assumptions, and ensure decision-makers understand practical effects.

NZDA recommends that:

1. NZDA is provided a statutory seat on the Conservation Authority, to give recreational hunters a representative voice:
2. public notification be required for significant concession applications, visitor amenities areas, land exchange or disposal proposals, significant area plan amendments, and proposals affecting hunting access:
3. submitters retain a right to be heard on significant proposals:
4. recreational user groups be expressly recognised as affected stakeholders:
5. decision-makers be required to respond to substantive public submissions:

6. public consultation periods be long enough for national and local organisations to consult members:
7. significant proposals affecting public access be notified nationally and locally; and
8. the submission period for the Bill be extended, given the Minister's change of position and the level of public interest.

International visitor access levy

NZDA supports, in principle, charging international visitors to access specific high-use, high-cost conservation areas, provided New Zealanders remain exempt.

NZDA has previously submitted that New Zealanders, including hunters, already contribute through taxation, volunteer work, game animal management, hut and track work, trapping, conservation projects, and community stewardship.

Recreational hunters should not be charged for general access to the backcountry or for ordinary hunting access.

NZDA supports international visitor charging only where:

1. it applies to high-use visitor sites:
2. it does not affect New Zealand citizens or ordinarily resident New Zealanders:
3. it does not apply to ordinary backcountry access by New Zealand hunters:
4. revenue is transparently reported:
5. revenue is used for conservation, visitor infrastructure, huts, tracks, access, safety, biodiversity and heritage work:
6. revenue is not used to justify future charging of New Zealanders:
7. implementation does not create barriers to lawful hunting; and
8. the system avoids costly, intrusive or impractical gatekeeping of public land.

NZDA recommends that the Bill expressly protect free access for New Zealanders and ensure that recreational hunters holding valid hunting permits are exempt from any access levy.