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Enquiries to: Judy van Rossem



Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240, NZ

[waikatoregion.govt.nz](http://waikatoregion.govt.nz)  
0800 800 401

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Committee Secretariat  
Environment Committee  
Parliament Buildings  
Wellington

Email: [en.legislation@parliament.govt.nz](mailto:en.legislation@parliament.govt.nz)

Dear Sir/Madam

### **Waikato Regional Council Submission to Conservation Amendment Bill**

Thank you for the opportunity to submit on the proposed Conservation Amendment Bill. Please find attached the Waikato Regional Council's (the Council's) submission regarding this Bill. The submission was formally endorsed by the Council's Strategy and Policy Committee on **18 June 2026**.

Should you have any queries regarding the content of this document please contact Judy van Rossem, Specialist Policy Advisor, Policy Implementation directly on (07) 859 0893 or by email [judy.vanrossem@waikatoregion.govt.nz](mailto:judy.vanrossem@waikatoregion.govt.nz)

Regards,

A handwritten signature in black ink, appearing to read "Tracey May".

Tracey May  
**Director Science, Policy and Information**

## Submission from Waikato Regional Council on the Conservation Amendment Bill

### Introduction

1. We appreciate the opportunity to make a submission on the Conservation Amendment Bill.
2. Waikato Regional Council (WRC) recognises that this is the most significant reform of conservation legislation in nearly 40 years and that the aim of the Bill is to provide a more streamlined and flexible conservation system.
3. WRC supports the overall intent to modernise and simplify the Conservation Act while protecting what matters to us as a region. We have an interest in this Bill in terms of:
  - (a) how it interacts with our environmental management, biosecurity and regional planning functions under the Resource Management Act 1991 (RMA) and the future planning framework under the Planning and Natural Environment Bills; and
  - (b) considering potential impacts on WRC's activities on conservation land. WRC relies on DOC concessions and permissions to undertake non-commercial statutory functions such as natural hazard management, emergency response, flood protection, land drainage, river management as well as providing high-quality, independent and timely environmental data for decision-making on natural resources, biodiversity and biosecurity matters. These activities are undertaken to ensure WRC is meeting its functions and obligations under the RMA and other legislation.
4. In addition, both WRC and DOC share functions under section 30(d) of the RMA with respect to the coastal marine area (CMA). This includes controlling land and associated natural and physical resources, as well as potential effects of the use, development, or protection of land, including the avoidance or mitigation of hazards.
5. WRC is providing feedback to the Select Committee on the Conservation Amendment Bill and also to DOC on the proposals for the first National Conservation Policy Statement (NCPS) through two separate submissions. This input supports alignment with WRC's functions under the RMA, particularly in managing environmental effects and ensuring integrated, effects-based decision-making.
6. Key submission themes are:
  - Changes to purpose-related provisions of the Conservation Act
  - Consistency in giving effect to the Treaty of Waitangi and upholding Treaty settlements
  - Modernising and streamlining the conservation management planning framework
  - Management of concessions
  - Land exchanges and disposals
  - Introducing visitor amenity areas
  - Charging an international visitor levy for access to some areas of conservation land
  - Clarity around Takutai Moana rights.

### Summary

7. In summary, our submission:
  - (a) Supports the Bill's objective of a more efficient and flexible conservation system, while seeking clarity that the proposed new economic function for DOC in new section 6(ea) will maintain conservation outcomes. We also seek that the system is aligned with the RMA, or its successor, to ensure integrated management of natural and physical resources.
  - (b) Recommends that Treaty settlement proposals allow for consistency with our current relevant settlement provisions to reduce the risk of undermining council-iwi relationships.
  - (c) Supports clear and transparent decision-making processes and seeks complementarity with the RMA. This includes ensuring that the Council's inputs into conservation processes are

transparently considered and able to influence decisions, to support integrated environmental management across public entities.

- (d) Supports the Bill's intent to simplify and consolidate the conservation management planning system through the introduction of an overarching National Conservation Policy Statement and area plans that provide more detail for local areas.
- (e) Supports stronger alignment between the NCPS, RMA national direction, and future resource management frameworks, as well as integration with local spatial planning, to enable better collaboration, data sharing, and evidence-based environmental outcomes.
- (f) Recommends expanding consultation requirements to ensure regional councils are engaged throughout the development and amendment of the NCPS and area plans, reflecting the full scope of regional council responsibilities beyond marine matters.
- (g) Supports efficient decision-making and clearer national direction, but recommends that the Bill retains appropriate independent oversight through the New Zealand Conservation Authority and local Conservation Boards, as well as early collaboration between DOC, iwi, councils and other public agencies so that local knowledge, community voices, and mana whenua perspectives continue to shape decisions.
- (h) Recommends that the Bill require the National Conservation Policy Statement (NCPS) to include a risk-based approach to natural hazards. This should, at a minimum:
  - avoid activities and development in areas of high or intolerable natural hazard risk, with explicit recognition of public safety considerations;
  - be informed by and apply relevant hazard risk assessments, including consideration of high-impact, low-probability events, and alignment with civil defence and emergency management planning frameworks; and
  - provide for mechanisms that support the transition of high-risk land away from development, including the use of designations, reserve status or other tools to prevent reoccupation or redevelopment where land has become unsafe.
- (i) Supports the Bill's move to streamline concession processes and the introduction of exempt and pre-approved activities through the NCPS.
- (j) Strongly recommends that the Bill or the subsequent NCPS explicitly exempts regional councils from needing to obtain concessions when undertaking statutory functions (such as state of the environment monitoring, biosecurity, and natural hazard management) on public conservation land, as these activities are for public benefit and do not result in commercial gain. Alternatively, where a full exemption is not appropriate, WRC recommends these statutory functions be classified as 'pre-approved activities' to provide a streamlined permitting pathway, or be explicitly included in the list of activities subject to 'standardised pre-assessment' to ensure they can proceed efficiently.
- (k) Seeks acknowledgement of the importance of regional council activities and the need for continuity of these in the long term.
- (l) Recommends strengthening the provisions for exempt and pre-approved activities to require consideration of local site values, clear limits on scale and intensity, and transparent criteria for suspending activities, to ensure conservation outcomes are not compromised.
- (m) Recommends requiring concession applications to include a clear description of site ecological values, including ecosystems, species present, and habitat connectivity, to ensure environmental effects are properly understood and conservation outcomes are protected.
- (n) Supports Ministerial flexibility to not publicly notify simple, low-risk grazing licence applications where clear criteria are met, while recommending notification or targeted consultation, including regional council input, where sensitive environments or regional plan matters may be affected.
- (o) Supports the Bill's proposal to allow concession terms of up to 60 years as this better aligns with the expected life of regional council drainage and flood protection assets, while ensuring that if

these durations are to occur that there are longer appropriate review provisions that take account of long-term risk assessment and review safeguards.

- (p) Recommends that stronger safeguards are needed for land exchange and disposal to:
- require assessment of future ecological, climate, natural hazard and connectivity values prior to disposal or exchange;
  - require a clear, robust “no net loss” (or net gain) test that accounts for local ecological values, habitat connectivity, landscape value and future conservation potential, rather than relying solely on non-equivalent “higher value” comparisons determined at a national scale.
  - consider downstream effects under the RMA, including risks of poorly located development and natural hazards; and
  - maintain transparency and independent oversight in decision-making.
- (q) Recommends amending section 16G(2)(b) to ensure that the primary conservation purposes and protection values of the underlying land prevail over Visitor Amenity Area provisions, so that tourism and development activities cannot override the fundamental intent of conservation land.
- (r) Recommends requiring that revenue from international visitor access levies be reinvested in the locations where it is collected, to support the ongoing maintenance, protection, and sustainability of highly visited conservation sites.
- (s) Recommends that DOC recognises the legislative functions of regional councils and allow an exemption of access charges for regional councils when undertaking activities on conservation land.
- (t) Recommends that implementation and role changes should occur in direct consultation with affected post-settlement governance entities and any governance entity named in legislation.
- (u) Recommends clearer terminology and explicit implementation steps for councils where Māori rights, customary marine title rights, or Treaty settlement redress may be affected.

8. We look forward to future consultation processes in relation to conservation law reform and would welcome the opportunity to comment further on any issues explored during the Select Committee process.

9. The Council wishes to make an oral submission and present its views to the Committee.

#### **Submitter details**

Waikato Regional Council  
Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240

Contact person:

Judy van Rossem  
Specialist Policy Advisor, Policy Implementation  
Email: [judy.vanrossem@waikatoregion.govt.nz](mailto:judy.vanrossem@waikatoregion.govt.nz)  
Phone: (07) 859 0893

## Changes to the purpose-related provisions of the Conservation Act

**We support** the Bill's objective of a more efficient and flexible conservation system, while seeking clarity that the proposed new economic function for DOC in new section 6(ea) will maintain conservation outcomes as the primary purpose and is aligned with the RMA, or successor, to ensure integrated management of natural and physical resources.

1. We support the Bill's objective of creating a more efficient and flexible conservation system. At the same time, we seek clarity that section 6(ea) will operate consistently with the Council's statutory responsibilities under the RMA to protect natural and physical resources, maintain water quality, manage natural hazards, and safeguard indigenous biodiversity. Public conservation land plays a critical role in supporting ecosystem resilience, climate change response and regional environmental outcomes. Introducing a statutory obligation to promote economic development should be implemented in a complementary way that maintains conservation values and supports integrated management under the RMA.

## Consistency in giving effect to the Treaty of Waitangi and upholding Treaty settlements

**We recommend** that new section 4A stay consistent with current RMA obligations safeguarding Treaty – council relationships and that conservation decision-making processes uphold the importance of our iwi management plan obligations, to reduce the risk of undermining council-iwi relationships.

2. We support the Bill's stated intention to uphold Treaty settlements. Any process agreed on by the government must clarify how existing Treaty Settlement legislation will continue to be upheld. Clear guidance on this matter is required. Regional councils are presently a named partner to several Treaty Settlement obligations, named by the Crown to deliver on aspects of the Crown's agreements and obligations with Treaty Settlement Iwi. If this partnership is to change then it is important that the Crown has provided absolute clarity for local government and settlement iwi what this changed relationship should be.

## Streamlining the conservation management planning framework

**We support** the Bill's intent to simplify and consolidate the conservation management planning system through the introduction of an overarching National Conservation Policy Statement and area plans that provide more detail for local areas.

**We support** stronger alignment between the NCPS, RMA national direction, and future resource management frameworks, as well as integration with local spatial planning, to enable better collaboration, data sharing, and evidence-based environmental outcomes.

**We recommend** expanding consultation requirements to ensure regional councils are engaged throughout the development and amendment of the NCPS and area plans, reflecting the full scope of regional council responsibilities beyond marine matters.

**We support** efficient decision-making and clearer national direction, but **we recommend** that the Bill retains appropriate independent oversight through the New Zealand Conservation Authority and Conservation Boards as well as early collaboration between DOC, iwi, councils and other public agencies so that local knowledge, community voices, and mana whenua perspectives continue to shape decisions.

**We recommend** that the Bill require the National Conservation Policy Statement (NCPS) to include a risk-based approach to natural hazards. This should, at a minimum:

- avoid activities and development in areas of high or intolerable natural hazard risk, with explicit recognition of public safety considerations;
- be informed by and apply relevant hazard risk assessments, including consideration of high-impact, low-probability events, and alignment with civil defence and emergency management planning frameworks; and
- provide for mechanisms that support the transition of high-risk land away from development, including the use of designations, reserve status or other tools to prevent reoccupation or redevelopment where land has become unsafe.

3. We support the new conservation management planning system including:

- (a) the creation of a new **National Conservation Policy Statement** (NCPS) that sits at the top of the conservation planning hierarchy and provides binding national direction, and
- (b) consolidating the various lower order management plans (conservation management strategies, conservation management plans and national park management plans) into a single layer of non-overlapping **area plans** covering all land, coastal and marine areas managed by DOC.

#### *Integration with regional council functions*

4. We consider that this system can result in a more streamlined planning process that better aligns with the current RMA framework and future planning framework under the Planning and Natural Environment Bills. However, we note that the requirement for area plans to cover the marine environment could also create a potential overlap with regional council functions in the coastal marine area under section 30 of the RMA. Area plans will need to align with the Waikato Regional Policy Statement and the Regional Coastal Plan, particularly around coastal water quality and ecosystem protection, to avoid conflicting direction.
5. DOC and local authorities share responsibilities under the RMA and both seek positive environmental outcomes. Alignment between the NCPS, RMA national direction, and future resource management frameworks is therefore important, along with integration between area plans and local spatial planning. Improved alignment would support more effective collaboration between DOC and local authorities, including better data sharing and more robust, evidence-based decision-making to strengthen outcomes for biodiversity, ecosystem connectivity, and pest management.
6. There are significant opportunities to improve collaboration and alignment across statutory plans and strategies, including for biodiversity, land management, and pest control. However, the Bill currently limits regional council involvement in the development of the NCPS and area plans to situations only where these plans contain provisions relating to the Marine Reserves Act 1971 or Marine Mammals Protection Act 1978. This does not reflect the breadth of regional council responsibilities under the RMA, as many functions we manage—such as freshwater, soil conservation, and natural hazards—interact directly with conservation land. Restricting consultation to a “marine-only” trigger risks missing important cross-domain interactions.
7. The Bill (through Clause 127) amends section 4(3)(a) of the RMA so that Crown land-use activities are exempt from section 9 controls where they are consistent with the NCPS or area plans. This amendment applies only to land-use controls. Regional council functions relating to water takes, discharges, and riverbed disturbances under the WRP remain in place, and DOC activities will continue to require resource consent in these areas. This maintains the regional council role in managing environmental

effects.

### *Ministerial decision-making*

8. We support efficient decision-making and recognise the value of clearer national direction. However, we are concerned at the Minister having unilateral decision-making powers, particularly for technical matters. We recommend retaining appropriate independent oversight as this would ensure that local knowledge, community perspectives and technical evidence continue to inform conservation decision-making. DOC, iwi, councils and other public agencies should work together early and openly where decisions affect shared responsibilities. This would help to avoid duplication or conflicting decisions, and support better outcomes for public conservation land and nearby catchments. We seek clearer definition of 'minor or technical amendments' where consultation may be bypassed. Maintaining a meaningful role for the New Zealand Conservation Authority and local Conservation Boards for appropriate independent oversight would support the successful alignment between national conservation planning and regional spatial planning.

### *Natural hazards*

9. We recommend ensuring there is clear alignment between the conservation planning system and wider risk management frameworks, particularly in relation to natural hazards, climate change and public safety. While regional policy statements and national direction under the RMA (including the proposed Natural Hazards National Policy Statement) embed risk-based approaches to land use planning, these are not directly reflected in the conservation planning framework.
10. While the proposal enables greater flexibility for granting concessions and activities on public conservation land, it would be strengthened by a clear requirement for a risk-based approach to natural hazards. The absence of such a requirement creates a material risk that development could occur in areas of elevated or increasing hazard exposure, without sufficient consideration of long-term risk, public safety or civil defence implications. This creates a potential gap in how natural hazard risk is considered across systems and does not reflect the expectations of Policy HAZ P3 in the Waikato Regional Policy Statement (WRPS), which requires consideration of high-impact, low-probability events and their implications for public safety, essential services and community response and recovery.
11. Over time, the proposal may unintentionally increase exposure to natural hazards and shift the downstream risk, cost, and emergency management burden to local government if safeguards are not included. The proposal may also limit our ability to proactively manage high-risk land after hazard events, particularly where land should transition away from development (e.g. where coastal erosion or instability has made it unsafe). We need to retain mechanisms to restrict or extinguish development rights in these areas as without them or alignment with designation or rezoning tools (such as reserve status or incorporation into the coastal marine area), landowners may continue to use or redevelop unsafe land, undermining long-term risk reduction and public safety.

### **Modernising and streamlining the concessions system**

**We support** the Bill's move to streamline concession processes and the introduction of exempt and pre-approved activities through the NCPS.

**We strongly recommend** that the Bill or the subsequent NCPS explicitly exempts regional councils from needing to obtain concessions when undertaking statutory functions (such as state of the environment monitoring, biosecurity, and natural hazard management) on public conservation land, as these activities are for public benefit and do not result in commercial gain.

**We seek acknowledgement** of the importance of regional council activities and the need for continuity of these in the long term.

**We recommend** strengthening the provisions for exempt and pre-approved activities to require consideration of local site values, clear limits on scale and intensity, and transparent criteria for suspending activities, to ensure conservation outcomes are not compromised.

**We recommend** requiring concession applications to include a clear description of site ecological values, including ecosystems, species present, and habitat connectivity, to ensure environmental effects are properly understood and conservation outcomes are protected.

**We support** Ministerial flexibility to not publicly notify simple, low-risk grazing licence applications where clear criteria are met, while recommending notification or targeted consultation, including regional council input, where sensitive environments or regional plan matters may be affected.

**We support** the Bill's proposal to allow concession terms of up to 60 years as this better aligns with the expected life of regional council drainage and flood protection assets, while retaining long-term risk assessment and review safeguards.

12. We support the move to modernise and streamline concession processes provided for in *new section 13E* (inserted by *Clause 15*), including the introduction of exempt and pre-approved activities managed through the NCPS.
13. WRC relies on concessions from DOC to carry out its statutory functions on public conservation land such as river management, land drainage, natural hazard management and environmental monitoring. Activities undertaken to fulfil these functions include:
  - Installing and managing a network of monitoring stations e.g. weather stations, river or lake level recording sites, groundwater monitoring wells, and continuous water quality monitoring. These monitoring stations provide data for hazard management and emergency response, and resource management.
  - Maintaining the network of flood protection and land drainage infrastructure such as stopbanks, floodgates, and pump stations.
  - Bankside erosion protection which may include vegetation layering, vegetation or rock groynes, vegetation training lines, obstruction removal, rock revetment, riparian planting and set-back fencing.
14. As such WRC activities are non-commercial and undertaken for public benefit, including protecting people, property, and the environment, we consider that in many cases they should be exempt, or at least pre-approved, from concession requirements under the Conservation Act, particularly where resource consent is not required under the RMA. In the past, we have experienced issues such as commercial fees for public-good activities, inconsistent advice on concession requirements, delays, and conditions where our functions are difficult to implement. These create unnecessary barriers to delivering core functions. Therefore, we seek acknowledgment of the importance of the activities undertaken by council and the need for the continuity of these in the long-term. We seek confirmation that council activities such as operating weather monitoring stations will not need a concession or are able to be pre-approved when meeting the conditions listed above.
15. We support making the concessions process more efficient and recognise the value of nationally determined conditions for low risk activities. We recommend, however, that the discretion afforded to the Minister in setting and applying conditions to exempt and pre-approved activities is supported by clear criteria. Nationally determined conditions may not adequately reflect local site values or the actual effects of activities in specific locations. The Minister is not required to confirm that each and every activity will avoid adverse effects (*new section 13E(2)* inserted by *Clause 15*), which creates a risk that activities may occur in inappropriate locations or at unsuitable intensities. This creates a risk that activities may be permitted subject to conditions that are difficult to interpret or implement, and which may be inconsistent with RMA decisions made by WRC. WRC strongly advocates for a consistency of

approach between government agencies that have environmental stewardship responsibilities, to ensure regulatory alignment and prevent conflicting directives on public conservation land.

16. We consider that the provisions allowing activities to be suspended would benefit from clearer criteria (*new section 13F* inserted by *Clause 15*). Activities may be allowed to occur before issues are identified, and there is potential for repeated suspensions without clear explanation. We recommend that decisions to suspend activities include reasons for the suspension and identify the risks or effects the activity is having, to support transparency and consistent implementation.
17. We consider that concession application requirements as detailed in *new section 14G* (inserted by *Clause 23*) are insufficient to support robust assessment of the effect of activities. While applicants must describe potential effects, there is no requirement to identify key ecological values such as ecosystems, species present, habitat connectivity, or ecological integrity. Without this information, impacts cannot be properly understood. The Council considers applicants should be required to describe site values to support informed, effects-based decision-making and protect environmental outcomes.
18. We support retaining flexibility for the Minister to make decisions about public notification especially for simpler or straightforward grazing licence applications under *new section 14R* (inserted by *Clause 23*), where the activity is low risk and clear criteria are met. Those criteria should identify when non-notification is appropriate, including where there are no sensitive environments, no likely adverse effects on wetlands/riparian margins/water quality, and no likely inconsistency with regional plan provisions. We consider that grazing licences affecting sensitive environments should be publicly notified or require focused and/or limited consultation, including input from regional councils where relevant.
19. We note that the Bill provides broad discretion for the Minister to impose conditions on concessions, including through standardised conditions under *new section 14ZS* (inserted by *Clause 23*). We are concerned that standardised concession conditions may not reflect site-specific values and risks. Conservation areas vary widely, and some environments, such as geothermal areas, cannot be restored once disturbed. The Council considers conditions should be tailored to each site, with standardised conditions limited to broad matters only.
20. We support the Bill's proposal in *new section 14ZY* (inserted by *Clause 23*) to allow concession terms of up to 60 years (beyond the standard 30 years) for long-life infrastructure. This is important for regional councils because much of the infrastructure and equipment used in land drainage and flood protection areas have an expected life of more than 60 years. WRC therefore needs DOC permissions that can align with the expected life of the assets already in place. Longer concession terms would provide greater certainty for the ongoing operation, maintenance, renewal, and investment needed to support these public-good assets. We recommend that the ability to grant longer terms is retained, with appropriate safeguards such as upfront consideration of long-term climate change and natural hazard risks, together with clear mechanisms for periodic review and adaptive management to ensure concessions remain suitable over time.

## Land exchanges and disposals

**We recommend** that stronger safeguards are needed for land exchange and disposal to:

- require assessment of future ecological, climate, natural hazard and connectivity values prior to disposal or exchange;
- require a clear, robust “no net loss” (or “net gain”) test that accounts for local ecological values, habitat connectivity, landscape value and future conservation potential, rather than relying solely on non-equivalent “higher value” comparisons determined at a national scale.
- consider downstream effects under the RMA, including risks of poorly located development and natural hazards that councils are then required to manage; and
- maintain transparency and independent oversight in decision-making.

21. We have concerns about the combined effect of the offsetting and compensation provisions under Section 15 of both the Planning Bill and the Natural Environment Bill, and the expanded land exchange and disposal provisions under *new Part 3C (new sections 15 to 15ZB)* of the Conservation Amendment Bill, as these create a real risk of an overall net loss of conservation value. While the legislation includes a goal to ‘achieve no net loss in indigenous biodiversity’ and requires that land acquired through exchange has higher conservation value, neither framework mandates a strict ‘like-for-like’ assessment. Without this safeguard, locally important values may be lost. For example, highly specific wetland habitat supporting endangered species in the Waikato could be offset, compensated, or exchanged for entirely different ecosystems elsewhere, resulting in the permanent loss of important regional biodiversity connections and ecological functions.
22. The concept of “net conservation benefit” (*new section 15C*) applies only to Crown ownership and does not account for the loss of protection once land leaves the conservation estate. This is particularly relevant to our council’s functions under the Resource Management Act, including biodiversity protection, water quality management, natural hazard mitigation, and maintaining ecosystem connectivity. Land with low current ecological value may still play an important role as a buffer, corridor, or future climate mitigation asset (e.g. carbon storage or habitat restoration). Once disposed of, these opportunities are permanently lost and may enable development outcomes that create downstream environmental and hazard risks that must be managed through the RMA framework.
23. We recommend broadening the criteria for land disposal under *new section 15K*. Land that is not the “best example” of its type may still provide critical habitat, ecological connectivity, or future conservation value, including for at-risk species or as corridors for species movement. These values are not adequately captured in the Bill, and there is limited clarity on how such assessments will be undertaken or what information will be relied upon.
24. Given the permanent nature of these decisions and the reliance on Ministerial discretion, the Council considers that stronger safeguards are required. Decisions on land exchange and disposal should take a long-term, public interest view, and should be based on a robust, site-specific assessment of ecological values, connectivity, future potential, and natural hazard risk, with a clear requirement to avoid net loss of conservation outcomes. Changes in land use must also consider downstream impacts on Council functions, including flood protection and hazard management. For example, in the Thames area of the Waikato Region, vegetation loss can worsen erosion and debris flows, increasing risk. Landscape values to protect outstanding natural landscapes should also be protected through the assessment process.

## Introducing visitor amenity areas

**We recommend** amending section 16G(2)(b) to ensure that the primary conservation purposes and protection values of the underlying land remain the primary purpose within which Visitor Amenity Areas operate, so that tourism and development activities cannot override the fundamental intent of conservation land.

25. We support the intent of the Visitor Amenity Areas (VAAs) to improve recreational and public amenities on conservation land. We recommend, however, that *new section 16G(2)(b)* is clarified so that protection principles continue to guide decisions where VAA authorisations are proposed. As currently drafted, tourism and development provisions may override the core conservation purpose of the land where there is a conflict. This risks prioritising visitor use over protecting natural, cultural, and landscape values, especially in sensitive areas. We consider that protection of site values should remain the primary consideration, and any development should be required to avoid or minimise harm and be consistent with the conservation purpose of the land.

## Charging international visitors a levy for access to some areas of conservation land

**We recommend** requiring that revenue from international visitor access levies be reinvested in the locations where it is collected, to support the ongoing maintenance, protection, and sustainability of highly visited conservation sites.

**We recommend** that DOC recognises the legislative functions of regional councils and allows an exemption of access charges for regional councils when undertaking activities on conservation land.

26. We support the general intention of the new international visitor access levy at a small number of highly visited conservation sites, with revenue intended to fund maintaining and enhancing visitor experiences on conservation land (*new section 48D*). The Waikato region has places that fit the criteria for potential places to be charged for access such as Mautohe/Cathedral Cove, Wairēinga/Bridal Veils Falls near Raglan and part of the Tongariro National Park. To maximise local benefits, we recommend that the revenue from international visitor access charges is reinvested back into the area where it is collected to ensure long term sustainability of those sites.
27. WRC has legislative functions under the RMA and other legislation that sometimes result in carrying out activities on conservation land. These activities include natural hazard management and emergency response, flood protection, land drainage and river management, as well as providing high quality, independent and timely environmental data for decision making on natural resources, biodiversity and biosecurity matters. WRC activities are primarily undertaken to prevent harm to people, property or the environment, are for the benefit of the public, and do not result in profit or commercial gain. We recommend DOC recognises the legislative functions of regional councils and allow an exemption of access charges for regional councils when undertaking their activities on conservation land. This would ensure the continuity of our activities without further burdens.

## Clarity around upholding Takutai Moana rights

**We recommend** that implementation and role changes should occur in direct consultation with affected post-settlement governance entities and any governance entity named in legislation.

**We recommend** clearer terminology and explicit implementation steps for councils where Māori rights, customary marine title rights, or Treaty settlement redress may be affected and therefore affect council functions.

28. The Council supports the intent of the Bill to uphold customary marine title (CMT) rights, including recognising CMT planning documents in area plans and applying conservation permission requirements to pre-approved and exempt activities within CMT areas. Strengthening the Bill with clear referral and engagement steps for CMT groups would provide more certainty for regional councils when working in the coastal marine area. This would support councils' functions under the RMA by ensuring that iwi interests are clearly identified early, integrated into decision-making, and aligned across conservation and regional coastal planning processes, reducing the risk of conflicting requirements and improving coordinated management of coastal environments.