



Submission of SAFE: Conservation Amendment Bill

To: The Environment Committee
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1. About SAFE

SAFE (Save Animals from Exploitation) is New Zealand's leading animal rights organisation. Our goal is to inspire institutional, political, and societal shifts that reduce animals' suffering, improve their lives, and ultimately, end their exploitation. SAFE represents the views of tens of thousands of New Zealanders who support stronger protections for animals.

2. Implications of Public Conservation Land Sales

The proposed Conservation Amendment Bill would make 60% of Public Conservation Land available for exchange or disposal, enabling land currently protected for conservation purposes to be sold.¹ As Public Conservation Land makes up over 30% of New Zealand's land area (more than 8 million hectares)², this proposal could significantly reduce protections for important ecosystems and wildlife habitat.

It is stated that the intent of the Bill is to “streamline processes by explicitly acknowledging that development is an acceptable activity on conservation land”, and under Section 6(ea) – prioritises recognising “the economic opportunities that arise from the use and development of land and other natural resources and historic resources” (which would apply to all conservation land).³

These sentiments are contradictory to the concept of conservation which by definition is to preserve, protect and restore the natural environment and wildlife, specifically protecting them from the damaging effects of human activity.⁴

Allowing conservation land to be sold or developed for economic purposes undermines the protections that conservation status is intended to provide. Conservation land exists to safeguard ecosystems, wildlife, and natural heritage for present and future generations. By prioritising development and economic opportunities on protected land, the Bill risks weakening the very purpose of conservation and reducing the long-term protection afforded to these areas.

¹ New Zealand Legislation. “Conservation Amendment Bill”. (Last accessed 12 June 2026).

<https://www.legislation.govt.nz/bill/government/2026/309/en/latest/#LMS1601551>

² Forest & Bird. (2026). “Conservation Land”. <https://www.forestandbird.org.nz/sites/default/files/2026-06/PCL%20%2B%20Bill%20explainer.pdf>

³ New Zealand Legislation. “Conservation Amendment Bill”. (Last accessed 12 June 2026).

⁴ Cambridge Dictionary. “Conservation”. (Last accessed 12 June 2026).

<https://dictionary.cambridge.org/dictionary/english/conservation>

2.1 Destruction to Natural Wildlife Habitats

The sale of Public Conservation Land for development projects is likely to result in the displacement of native and local animals who call these areas home. Once ecosystems are degraded, they can be difficult to restore, despite their importance to ecological balance and biodiversity.⁵ It is not an acceptable trade-off to damage ecosystems and displace wildlife to facilitate development, especially considering real estate has been identified as one of the main contributors to environmental destruction.⁶

New Zealand already has approximately 7,500 species of plants and animals at risk of extinction.⁷ Although the Bill has specified that land areas with endangered species would still be protected, the sale can extend to land areas that are home to animals who are 'at risk'. According to the Department of Conservation, 'at risk' species can quickly become threatened if the management of conservation is reduced or if a new threat arrives in the area.⁸ This may affect species who are declining in population, are recovering from a significant prior decline, and species who have only ever existed in small population groups.⁹

Data published in 2023 by Stats NZ shows that many of New Zealand's native species groups are in serious decline, with more than half of the species in several groups either threatened with extinction, or at risk of becoming threatened.¹⁰ In particular, 84% of reptiles, 82% of birds, 80% of bats, and 76% of frogs are either threatened with extinction or are at risk of becoming threatened.¹¹ Habitat loss is a well-established driver of these declines. The clearing of forest land has been linked to population decline in frogs¹²; reptiles such as tuatara are vulnerable to habitat change¹³; bats whose tree habitats have

⁵ Li, J. (2024). "What Are The Consequences of Biodiversity Loss?". Last accessed 12 June 2026.

<https://earth.org/what-are-the-consequence-of-biodiversity-loss/>

⁶ Biodiversity & Infrastructure. (2023). "1.3.1 Direct loss of habitat". Last accessed 12 June 2026.

<https://www.biodiversityinfrastructure.org/handbook/1-infrastructure-effects/1-3-primary-effects/1-3-1-direct-loss-of-habitat/> 46 Simkin, R. S

⁷ Endangered Species Foundation. "Top 10 Endangered Species". Last accessed 12 June 2026.

<https://www.endangeredspecies.org.nz/top-10-endangered-species>

⁸ Department of Conservation. "Conservation status of plants and animals". Last accessed 12 June 2026.

<https://www.doc.govt.nz/nature/conservation-status/>

⁹ Department of Conservation. "Conservation status of plants and animals". Last accessed 12 June 2026.

¹⁰ Stats NZ. (2023). "Extinction threat to indigenous species". Last accessed 12 June 2026.

<https://www.stats.govt.nz/indicators/extinction-threat-to-indigenous-species/>

¹¹ Stats NZ. (2023). "Extinction threat to indigenous species". Last accessed 12 June 2026.

¹² Department of Conservation. "Frogs/pepeketua". Last accessed 12 June 2026.

<https://www.doc.govt.nz/nature/native-animals/reptiles-and-frogs/frogs-pepeketua/>

¹³ Department of Conservation. "Tuatara". Last accessed 12 June 2026.

<https://www.doc.govt.nz/nature/native-animals/reptiles-and-frogs/tuatara/>

been cleared for urban expansion, agricultural intensification, and logging¹⁴; and birds¹⁵. Alongside these statistics, the Department of Conservation also reports that 97 species of native New Zealand birds are already classified as ‘at risk’.¹⁶

At a time when many of New Zealand’s native species are already facing significant population decline, it is inappropriate to weaken protections for the habitats on which they depend. These vulnerable species require strong and ongoing protections to support biodiversity and maintain healthy ecosystems, which this Bill fails to provide.

2.2 Detrimental Impacts of Grazing Land

The potential sale of Public Conservation Land to farm owners who border these areas could pose a significant risk to animal welfare. Removing forestry and shrubbery in protected areas to increase grazing land may potentially increase the number of pasture-raised animals in the farming industry. In 2025, New Zealand farmed 3.84 million cows for beef¹⁷, 5.9 million cows for dairy¹⁸, and 23.36 million sheep¹⁹. Together, these figures represent millions of animals whose lives are shaped by the demands of the meat and dairy industries. New Zealand should be focused on reducing the number of animals subjected to farming systems, not expanding opportunities for further agricultural development.

Additionally, expanding grazing land may increase environmental pressures on freshwater ecosystems. Pasture-based farming can contribute to the runoff of sediments, nitrates, and phosphorus into waterways, degrading water quality and harming aquatic ecosystems.²⁰ Excess nutrient pollution can fuel algal blooms, which have been linked to declining water quality in New Zealand lakes²¹, and made an estimated 45% of New

¹⁴ Department of Conservation. “Bats/pekapeka”. Last accessed 12 June 2026.

<https://www.doc.govt.nz/nature/native-animals/bats-pekapeka/long-tailed-bat/>

¹⁵ Department of Conservation. “Australian crested grebe/kāmana/pūteketēke”. Last accessed 12 June 2026.

<https://www.doc.govt.nz/nature/native-animals/birds/birds-a-z/australasian-crested-grebe-kamana/>

¹⁶ Department of Conservation. “Threatened Birds”. Last accessed 12 June 2026.

<https://www.doc.govt.nz/nature/conservation-status/threatened-birds/>

¹⁷ Beef & Lamb. (2025). “Stock Number Survey”. Last accessed 12 June 2026.

<https://beeflambnz.com/knowledge-hub/PDF/stock-number-survey-report-30-june-2025.pdf>

¹⁸ StatsNZ. (2024). “Livestock numbers: Data to 2023”. Last accessed 12 June 2026.

<https://www.stats.govt.nz/indicators/livestock-numbers-data-to-2023/>

¹⁹ Beef & Lamb. (2025). “Stock Number Survey”. Last accessed 12 June 2026.

²⁰ Ministry for the Environment. (2023). “Paru mauti Pugging”. Last accessed 12 June 2026.

<https://environment.govt.nz/assets/publications/Pugging-Guidance-for-intensive-winter-grazing.pdf>

²¹ StatsNZ. (2023). “New report highlights pressures on Aotearoa New Zealand’s freshwater”. Last accessed 12 June 2026. <https://www.stats.govt.nz/news/new-report-highlights-pressure-on-aotearoa-new-zealand-s-freshwater>

Zealand's waterways unsuitable for swimming due to infection risk between 2016 and 2020.²²

SAFE believes conservation land should be managed in accordance with its primary purpose: protecting native wildlife, biodiversity, and natural ecosystems from activities that may degrade or destroy them. The long-term protection of these values should remain the priority for conservation land, rather than facilitating development or economic use.

3. Reduced Independent Oversight

The Conservation Amendment Bill proposes the development of secondary legislation known as the National Conservation Policy Statement. While this process is being consulted on separately, SAFE is concerned about the governance changes proposed under the Bill. In particular, the move to a single-layer area planning framework would reduce the role of the New Zealand Conservation Authority and Conservation Boards while concentrating decision-making power with the Minister of Conservation.

Although these changes are presented as a way to streamline decision-making, they risk reducing the independent oversight, expert input, and public participation that help ensure conservation decisions are robust and well informed. Existing processes provide important opportunities for scrutiny and accountability when decisions are made about the management and use of conservation land.

SAFE is also concerned that these changes reflect a broader trend towards prioritising efficiency over scrutiny in environmental decision-making. Recent legislative changes, including the Crown Minerals Amendment Act 2025, the suspension of Significant Natural Areas requirements, and the repeal of the Clean Car Discount, demonstrate a willingness

²² StatsNZ. (2023). "New report highlights pressures on Aotearoa New Zealand's freshwater". Last accessed 12 June 2026.

to weaken environmental protections and reduce opportunities for public and expert input.^{23 24 25 26}

Multi-stage decision-making processes exist to ensure proposals are properly assessed and that the interests of both the environment and future generations are adequately protected. SAFE does not support reforms that reduce these safeguards.

4. Recommendations

SAFE recommends the Environment Committee:

1. Reject the proposed Conservation Amendment Bill.
2. Reaffirm that conservation land provides critical habitat for wildlife and should remain protected from disposal and inappropriate development.
3. Ensure that conservation policy prioritises environmental protection and biodiversity over short-term economic gain.

5. Conclusion

The proposed Conservation Amendment Bill would weaken protections for conservation land, biodiversity, and wildlife habitat at a time when many native species are already under significant pressure. The Bill also reduces independent oversight of conservation decisions, increasing the risk that environmental protections will be compromised in favour of competing interests.

SAFE believes conservation land exists to protect the natural environment and the animals who depend on it. These protections should be strengthened, not weakened. For these reasons, SAFE recommends that the Environment Committee reject the proposed Conservation Amendment Bill.

²³ New Zealand Parliament. (2026). "Thursday, 19 February 2026". Hansard. Last accessed 12 June 2026. <https://hansard.parliament.nz/hansard-transcript/2026-02-19/bills-english-languagebill?slid=4810426869b34a919fe66f993c0c6a51>

²⁴ Ministry for Business, Innovation and Employment. (2025). "Crown Minerals Amendment Act 2025". <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/minerals-andpetroleum/consultations-and-reviews/crown-minerals-amendment-act-2025>

²⁵ Beehive. (2024). "Significant Natural Areas requirement to be suspended". <https://www.beehive.govt.nz/release/significant-natural-areas-requirement-be-suspended>

²⁶ Beehive. (2023). "Bill to repeal 'Ute Tax' passed". <https://www.beehive.govt.nz/release/bill-repeal-%E2%80%98ute-tax%E2%80%99-passed>

