



10 August 2026

S26.13

Submission to the Department of Conservation on the National Conservation Policy Statement

Introduction

1. The National Council of Women of New Zealand, Te Kaunihera Wāhine o Aotearoa (NCWNZ) is an umbrella group representing around 50 affiliated organisations and 300 individual members. Collectively our reach is over 200,000 with many of our membership organisations representing all genders. NCWNZ has 12 branches across the country.
2. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
3. This submission has been prepared by the NCWNZ Climate Change & Environmental Sustainability Action Hub and the Submissions Coordination Committee. It draws on longstanding NCWNZ policy¹, and our recent submissions on the Conservation Amendment Bill and on Modernising Conservation Land Management Proposal².

Summary

4. NCWNZ sees access to safe, public natural spaces as paramount to support women's health, independence, and cultural continuity across generations.

¹ National Council of Women of New Zealand, Resolutions 1896-2020: [Resolutions - National Council of Women of New Zealand](#).

² National Council of Women of New Zealand, Submissions: [Submissions - National Council of Women of New Zealand](#)
S26.11 Conservation Amendment Bill; S25.07 Modernising Conservation Land Management Proposal.

5. NCWNZ acknowledges that the National Conservation Policy Statement (NCPS) Consultation Document³ asked that feedback not include comments on the Conservation Amendment Bill (the Bill). However, given that the NCPS gives effect to the Bill, the overarching concern for NCWNZ remains the same. As they stand, the Bill and the NCPS create an unacceptable level of trade-off between economic development and conservation protection.
6. NCWNZ believes that the NCPS focuses on the operational objectives of efficiency, consistency, concession management, and enabling appropriate economic activity on conservation land while ignoring the strategic framing provided by explicit long-term environmental, social, intergenerational, and wellbeing outcomes. These outcomes should be used to assess future decisions.

Major concerns

7. NCWNZ has chosen to focus on two fundamental concerns with the NCPS: Clear strategic foundation objectives and transparent decision-making.

Clear strategic foundation objectives

8. NCWNZ understands that the proposed NCPS will update the same functions of the current general policies that guide national conservation management, the Conservation General Policy (CGP), and General Policy for National Parks. However, we note that the proposed NCPS is much more than an update to the current CGP. It represents a fundamental shift in how conservation land is planned, managed, and authorised.
9. Moreover, the proposed NCPS is an administrative and regulatory framework to enable more economic activity on conservation land, whereas the CGP is primarily a conservation-led framework.
10. NCWNZ further notes that there is no mention of biodiversity or of climate change commitments in the NCPS. Instead, our international obligations⁴ - which clearly state that Aotearoa New Zealand needs to take urgent action on global targets to safeguard and sustainably use biodiversity, and to combat climate change and its impact - are put in jeopardy by the NCPS's objectives of streamlining planning processes and unlocking economic activity.

³ Department of Conservation. 2026. National Conservation Policy Statement Consultation Document. <https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2026/ncps/ncps-consultation-document.pdf>

⁴ United Nations Environment Programme. 2022. Kunming-Montreal Global Diversity Framework. <https://www.unep.org/resources/kunming-montreal-global-biodiversity-framework> United Nations. UNFCCC and Climate, Peace and Security. [United Nations Framework Convention on Climate Change \(UNFCCC\) and Climate, Peace and Security | Climate Security Mechanism](#) ; United Nations. 1979. Convention on the Elimination of All Forms of Discrimination against Women New York, 18 December 1979. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>; United Nations. Department of Economic and Social Affairs. Sustainable Development Goal 13. [Goal 13 | Department of Economic and Social Affairs](#)

11. NCWNZ would expect to see clear strategic foundation objectives for operational policies, such as:
- a) a vision for the protection and preservation of conservation land over the next 20-50 years;
 - b) commitment to Te Tiriti o Waitangi partnership;
 - c) a plan for biodiversity recovery;
 - d) clearly outlined mechanisms for climate change adaptation and resilience;
 - e) inclusion of issues around cultural and intergenerational wellbeing.

Transparent decision-making

12. There are two strands to transparent decision-making: firstly, regarding the public consultation process for the NCPS, and secondly, the decision-making processes within the NCPS.
13. NCWNZ believes that the public consultation process for the Bill and NCPS presents as a fait accompli; as such, it weakens public trust in participatory decision-making. The NCPS has been written to support the Conservation Amendment Bill before public consultation on the Bill has been given due consideration.
14. We remain deeply concerned about the removal of layers of independent oversight in the Bill and the NCPS, with a concentration of decision-making power in the Minister and Director-General. We are also concerned about the reduced role of the NZ Conservation Authority and Conservation Board.
15. NCWNZ believes that the rights and obligations articulated in Te Tiriti o Waitangi/ Treaty of Waitangi as the founding document of Aotearoa must be made explicit. The NCPS should recognise that enduring conservation outcomes depend on decision-making arrangements - including consultation - that enable Māori to exercise meaningful influence as Treaty partners.
16. Ensuring transparent, participatory decision-making processes is critical. Women's voices are more likely to be excluded when consultation is reduced, particularly those voices from the community level where much environmental stewardship occurs.

Conclusions

17. NCWNZ believes that the process of consultation for the NCPS is flawed and written in advance of considering and including public response to the Conservation Amendment Bill.
18. We also believe that the proposed content of the NCPS is focused on operational objectives to enable economic activity on conservation land but is silent on the long-term environmental outcomes against which decisions can be assessed.

19. We are deeply concerned that the focus on efficient decision-making processes is at the expense of involvement and recognition of Māori as Treaty partners, of independent oversight, and the sharing of decision-making power beyond the Minister.

20. NCWNZ recommends that the NCPS:

- i. establish clear long-term conservation and environmental outcomes;
- ii. strengthen recognition of Te Tiriti o Waitangi and Māori partnership in decision-making;
- iii. retain robust independent oversight and accountability mechanisms;
- iv. ensure meaningful public participation and transparency in decision-making processes;
- v. adopt a precautionary approach where conservation values may be adversely affected;
- vi. recognise and protect the health, wellbeing, recreation, cultural, and community benefits of public conservation land; and
- vii. prioritise the interests of future generations in the management of conservation land and waters.

21. Public conservation land is a national inheritance and taonga held in trust for future generations. The NCPS should therefore provide a clear and enduring vision and prioritise the use of transparent decision-making that safeguards the environmental, social, cultural, and wellbeing benefits that women, children, families, and communities derive from nature.



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