

Stewardship land in Aotearoa New Zealand

Options to streamline processes
for reclassification and disposal

Summary of submissions
September 2022



Department of
Conservation
Te Papa Atawhai



**Te Kāwanatanga
o Aotearoa**
New Zealand Government

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Purpose

1. This report presents a summary of submitters' feedback on the options for legislative change in *Stewardship land in Aotearoa New Zealand: options to streamline processes for reclassification and disposal*, November 2021 (the discussion document).
2. The scope of this report is descriptive. Repetition from the discussion document has been kept to a minimum to keep the report concise and accessible. The full discussion document can be accessed online at www.doc.govt.nz/stewardship-land-consultation.

Acknowledgements

3. The Department of Conservation (DOC) is grateful to everyone who made submissions and otherwise participated in the engagement process by joining discussions and meetings, raising questions and providing feedback.
4. The submissions and engagement have been constructive and valuable, with contributors collectively bringing lifetimes of experience and many different perspectives, including tangata whenua perspectives and perspectives from commercial, recreation, conservation, local government and other statutory organisations.

Next steps

5. The submissions will continue to be considered as DOC and the Minister of Conservation determine options for legislative change. The Minister of Conservation is due to report back to Cabinet in mid-2022. Subject to Cabinet agreement of options, the submissions will also inform further analysis for the drafting of legislation.

Background

Context

6. The discussion document provides detailed information about stewardship land and the context of the work. A few key points are noted here.
7. Stewardship land includes the land that came into DOC's management by transfer of land from other Crown agencies when DOC was established in

1987. It makes up about 30% of the land administered by DOC. The status of stewardship land was intended to offer interim protection until conservation and other values were fully assessed, and the land was reclassified accordingly. However, since 1987 only a small number of stewardship land parcels have been reclassified.

8. The Government has committed to accelerating the review and reclassification of stewardship land, and a two-part stewardship land reclassification project was announced by the Minister of Conservation in May 2021. More information about this project can be found accessed online at www.doc.govt.nz/stewardship-land.
9. The project comprises two workstreams.
 - The establishment of National Panels to provide recommendations to the Minister of Conservation for the reclassification of stewardship land.
 - Legislative change to support the panel processes and streamline the reclassification process to better enable reclassification to take place in the future.

National Panels workstream

10. The National Panels have been appointed and are taking a region-by-region approach to assessing stewardship land. Work began in late 2021 and the first region being considered is the West Coast of the South Island. In this region, a Ngāi Tahu-appointed Mana Whenua Panel has been established to work alongside the national panel to provide information on mahika kai, mātauranga Māori, and Ngāi Tahu interests in relation to stewardship land within their rohe/takiwā (tribal district).
11. DOC staff will speak with tangata whenua in other regions to understand how they wish to participate in the stewardship land reclassification process when it takes place within their rohe/takiwā.
12. Information about the national panel process is available at www.doc.govt.nz/reclassification-national-panels.

Legislative workstream

13. The discussion document and this report are about the legislative workstream.
14. At present, once the National Panels have assessed stewardship land and made recommendations to the Minister of Conservation, steps will be required under the Conservation Act 1987 and other policy instruments to implement a reclassification.

15. The legislative part of the project is to review the statutory processes and identify improvements to facilitate reclassification through legislative change.
16. Following announcement of the project, legislative change options were developed by DOC and presented in the discussion document.

Consultation process

17. The discussion document was published on 19 November 2021, and consultation was open from 19 November 2021 to 18 March 2022. This offered a 4-month consultation period and took into account the summer holidays.
18. The engagement approach identified three key groups: tangata whenua (whānau, hapū and iwi), key stakeholders and the wider public. The approach for each group was different, with targeted engagement aimed at tangata whenua and key stakeholders, and an online portal established for the wider public.
19. Information about the consultation was sent directly to tangata whenua and key stakeholders, and the stewardship land policy team were available for meetings by request during the consultation period. Various groups, including tangata whenua, the New Zealand Conservation Authority (NZCA),¹ conservation boards,² councils, non-governmental organisations and industry bodies, took up the offer to meet, and DOC was able to present on the options, discuss questions and hear preliminary feedback.
20. There were also four regional online hui with whānau, hapū and iwi groups.
21. The stewardship land policy team and operational teams (from the national panel process) attended meetings and hui together to ensure that information could be provided in response to a wide range of questions. The consultation was also discussed in routine meetings with key stakeholders (eg quarterly relationship meetings).
22. An email message was also sent to everyone listed in the concessions database 1 month before the closing of the consultation.

¹ The NZCA is an independent statutory body that advises the Minister of Conservation and the Director-General of DOC on conservation priorities at a national level.

² Conservation boards are independent bodies that empower local communities and iwi to contribute to the management of conservation areas. Board members are appointed by the Minister of Conservation.

Submissions

23. A total of 166 submissions were received. All submitters are listed in *Appendix A: List of submitters*. The following submissions have been grouped for reporting purposes.
- Tangata whenua – 7 submissions, including whānau, hapū and iwi, and organisations
 - Environmental non-governmental organisations (ENGOS) – 8 submissions from 6 national and 2 regional ENGOS
 - Recreational non-government organisations (recreational NGOs) – 15 submissions from 8 national bodies and 7 from regional groups (including 6 regional four-wheel-drive clubs)
 - Businesses and business organisations – 24 submissions representing the energy, communications, tourism, farming (grazing licences), recreation and mining sectors
 - Statutory bodies – 18 submissions from conservation boards, regional and district councils, Fish and Game New Zealand, the Walking Access Commission, and the Nature Heritage Fund
 - Individuals – 94 submissions, about 50 of these are unique, and the remainder are form submissions (eg 23 copies of the same submission, 12 of another, and a few where two or three of the same submission were received); many of the individual submissions were from people with extensive experience in land use and with deep institutional and historic knowledge
24. Physical addresses were not sought in the submission process, but several submitters did provide a town, region or other address, and these indicated that submissions were received from around the country.

Structure of this document

25. The discussion document sought comments on (in this order):
- the objectives of legislative change
 - the problem definition
 - six change areas (with seven change options) – the seven change options are numbered 1.1, 1.2, 2, 3, 4, 5 and 6, with public consultation processes having two change options (1.1 and 1.2) and the remaining five areas only having one change option each compared with the status quo. The full title of each change option is used as the section heading. Shorter descriptive versions are:
 - option 1.1: 20-day consultation

- option 1.2: ability to decline a hearing
 - option 2: enable National Panels to conduct consultation
 - option 3: enable National Panels to make national park recommendations
 - option 4: amend legislation for land to be held for conservation purposes
 - option 5: enable return of any sale funds to DOC
 - option 6: amend legislation to enable concessions to continue
- non-regulatory work and implementation.
26. Responses ‘in support’ or ‘not in support’ of change options are reported by option (as above) and by submitter group alongside description of the main reasons submitters gave for their responses and any risks, impacts and other considerations they raised.
 27. Quotes are used to maintain the voice of the submitters and to illustrate a view that several submitters expressed. The views expressed in the document are submitter views which have been paraphrased, unless an identified quote.
 28. Tables and charts are used to illustrate the number of submitters supporting or not supporting the change options, and additional quantitative information is provided in *Appendix B: Summary of preferences*. Proportions within submitter groups are not shown because the groups were small, so proportions could shift significantly for one or two organisations and be misleading.

Tangata whenua (whānau, hapū and iwi) submissions

29. There were seven submissions from organisations identifying as tangata whenua. Preferences and key themes from these submissions are indicated here, as well as alongside other submissions. This approach of having an overview here and inclusion in the general discussion was taken because:
 - it is important to clearly identify and consider tangata whenua views in any context
 - many general submissions included commentary on Treaty of Waitangi considerations and/or also reflected tangata whenua voices.
30. Of note, some whānau, hapū and iwi noted that their feedback was provided as a Treaty partner, rather than as a public submission. It should be noted that we refer to ‘submissions’ and ‘submitters’ in this document as a shorthand for all feedback, including from Treaty partners.

31. Tangata whenua expressed strong interest in participating in the national panel reclassification process in their rohe and about their land interests. This was also commonly stated in meetings and other engagement, although not all these discussions led to a submission.
32. Regarding national panel and reclassification work in general, the tangata whenua submissions have been referred to DOC operational teams to inform current and future work with tangata whenua in each region.
33. Table 1 provides some indicative views expressed by tangata whenua on the legislative options. The sample size is too small for quantitative analysis and responses should be considered representative for only these submitters rather than as an overall tangata whenua view.

Table 1: Overview of tangata whenua views on change options.

Change option	Key comment	Support	Do not support	Not stated
Option 1.1: 20-day consultation	Support is subject to tangata whenua partnership in assessments	3	2	2
Option 1.2: ability to decline a hearing	Preference to enable kano ki te kano (face to face) if not at decision-making table	0	3	4
Option 2: enable National Panels to conduct consultation	Noted poor experiences of DOC concession hearings	4	1	2
Option 3: enable National Panels to make national park recommendations	Support is subject to tangata whenua involvement in decision making	2	2	3
Option 4: amend legislation for land to be held for conservation purposes	Consider right of first refusal and other Treaty settlement rights and return of land	1	3	3
Option 5: enable return of any sale funds to DOC to cover costs of reclassification	Support is subject to funds remaining for use in the local area	4	2	1
Option 6: amend legislation to enable concessions to continue	There must be consultation with mana whenua about concessions in their rohe	2	2	3

34. The following quotes illustrate some of the views raised by tangata whenua.

Eighty percent of public conservation land and the great majority of stewardship land sits within the Ngāi Tahu Takiwā. Accordingly, Te Rūnanga expects the Crown to recognise the status and weight of Ngāi Tahu whānui and the extent of the Ngāi Tahu Takiwā in all matters affecting conservation land

(Te Rūnanga o Ngāi Tahu)

The ability to practice kaitiakitanga and contribute tikanga, kawa and mātauranga to decision-making and management processes is important to the people of Maniapoto. The rangatiratanga status of Maniapoto as confirmed in Te Tiriti o Waitangi is integral to the mana of Maniapoto and the exercise of kaitiakitanga. The people of Maniapoto expect to exercise a degree of autonomy, authority, and influence within the Maniapoto rohe to uphold kaitiaki responsibilities.

(Maniapoto Māori Trust Board)

Decisions on the best future use of our stewardship land should be made using a process that is bespoke to each rohe, not something that is ‘tweaked’ from a ‘one-size-fits-all’ approach that has already started on the South Island.

(Te Hiku Conservation Board)

Summary of submissions

35. This section summarises all submissions on the topics and change options outlined in the discussion document in the order presented in that document.

Objectives

36. The discussion document set out five objectives for legislative change.
- Enabling a more efficient process for reclassifying stewardship land.
 - Delivering clarity for everyone on the status of the land and the appropriate level of protection/use of the reclassification process.
 - Ensuring DOC meets its wider obligations under conservation legislation and the Conservation General Policy (such as section 4 of the Conservation Act 1987).
 - Ensuring conservation values are adequately protected.
 - Enabling the National Panels to carry out their work efficiently and effectively.
37. The discussion document asked if people agreed with the objectives and thought any other objectives should be included.
38. Views were nuanced because support or lack of support was generally related to one or two of the objectives, qualified, or provided with proposed additions. Indicators of ‘support’ and ‘concern’ about the objectives are provided in Table 2. These should be considered alongside the points and themes noted below the table.

Table 2: Views of support and concern about the objectives.

Submitter type/preference	Total	Support objectives	Express concern	Not directly stated
Tangata whenua	7	1	4	2
ENGOS	8	1	4	3
Recreational NGOs	15	6	1	8
Business and business organisations	24	6	4	14
Statutory bodies	18	7	8	3
Individual	94	6	30	58
Total	166	27	51	88

39. Submitters who supported the objectives considered that making the reclassification process more efficient would be helpful for reclassification.
40. There were several proposals to add to and amend the objectives to:
- provide a more transparent view, or an overarching objective, about section 4 of the Conservation Act³
 - note recreational values
 - note climate change, biodiversity goals and the potential role of stewardship land.
41. There were many general comments about the conservation values of stewardship land and the classifications it should receive, such as:
- opposition to disposal of any stewardship land because nearly all of it would have conservation value
 - land that does not have high conservation value may have recreational value and enable access
 - Nature Heritage Fund purchases should be kept and reclassified as a priority
 - high-value areas could be prioritised and reclassified first, especially areas already identified for reclassification by conservation boards and the NZCA
 - there are alternatives for protecting stewardship land – for example, land swaps and leases, Queen Elizabeth II Trust (QEII) covenant protections.

³ Section 4, Conservation Act 1987, 'This Act shall so be interpreted and administered as to give effect to the principles of the Treaty of Waitangi'.

42. Other points made about the objectives were:
- using the land for non-conservation purposes does not necessarily mean that conservation values are not protected (eg pastoral farming and weed control)
 - it takes resources and on the ground effort to protect conservation values, which reclassification alone will not achieve.
43. Submitters who did not support the objectives, especially the objectives related to National Panels, argued that:
- higher classification will make other uses of the land impossible or harder, so should not be rushed
 - the approach of using National Panels for reclassification should not have been progressed without the participation of tangata whenua in deciding the approach
 - the objectives and reclassification will have little effect – for example, they will not address cost or section 4 of the Conservation Act 1987

The submitters had the following concerns:

- rushing reclassification because it is a once in a generation opportunity and more important to get it right; related to this was disagreement with an accelerated national panel reclassification process
 - undertaking reclassification when the Conservation Act needs reform and prior to more information on the Options Development Group⁴ recommendations being available
 - the outcomes for communities if reclassification is rushed and relies only on conservation values and not wider social, economic, environmental and cultural values
 - progressing legislative change before there is the opportunity to learn from the reclassification experience in the western South Island
 - potential conflict of interest with the Ngāi Tahu panel commercial interests.
44. The following quotes reflect commonly expressed views about the objectives.

⁴ The Options Development Group (ODG) is an independent body established in September 2020 to assist DOC in the partial reviews of the Conservation General Policy and General Policy for National Parks (the general policies). The ODG was asked to develop proposed changes to the general policies to better reflect Treaty partnership. Further information can be at www.doc.govt.nz/our-work/partial-reviews-of-conservation-general-policy-and-general-policy-for-national-parks/options-development-groups/.

[add to the objectives] ensuring the Crown is meeting its wider obligations to iwi/Māori including its obligations as Treaty partner.

(Tasman District Council)

[add to the objectives] ensuring the Crown meets its wider obligation in relation to climate change, including recognising the importance of stewardship land in providing mitigation options.

(Tasman District Council)

[amend the objectives] ensuring land classified as stewardship land which has been assessed as having medium or high conservation values is reclassified to protect these values.

(Bay of Plenty Conservation Board)

The objectives fail to provide adequate consideration for the role of DOC in giving effect to the Treaty of Waitangi (section 4 Conservation Act), and the general consideration of Te Ao Māori. ... we support the submissions from Te Rūnunga o Ngāi Tahu and Te Rūnanga o Makaawhio.

(Future Farming South Westland)

How the Department meets its section 4 obligations under the Conservation Act 1987. This is consistently mentioned as an aside or wider obligation throughout the document. It is not. It is central to what the Department does and why it does it. It should be up front in any discussion and clarify the role and responsibility of the Department.

(Te Korowai o Ngāruahine Trust)

45. The following quotes express common views about the objectives as they relate to National Panels.

Overall we are generally supportive of the legislative process ... However, we have concerns regarding the 5-year^[5] timeline for the reclassification and the 'one size fits all' approach. As the reclassification of stewardship land has been stalled for such a long time due to its inherent complexity, we believe that all interested parties want to see this process done correctly, or not at all.

(Federated Farmers)

The fast-tracked five-year time frame for classifying 3,000 parcels of stewardship land will not allow enough time for proper scrutiny - for detailed field assessments to be done, and due consideration to be undertaken. This could lead to poor decision-making.

(Individual Group IV)

⁵ DOC do not have a specific timeframe and is unsure where the perception of 5-years comes from; it may be from an earlier project, or an assumption based on the number of regions.

Problem definition

46. The discussion document provided a problem definition section entitled ‘Why we are reviewing the legislation for reclassifying stewardship land?’, with background information on stewardship land and the reasons for delays to reclassification since 1987. The section covered the complexity and expense of reclassification and tensions arising from the lack of progress.
47. The discussion document asked submitters if they:
- agreed with the description of the problem, and to provide reasons
 - had views on any additional factors contributing to the problem
 - considered there were any other issues or impacts caused by the delay in reclassifying stewardship land on a large scale.
48. Feedback was nuanced rather than directly stated. The numbers in Table 3 show support for or concern about the problem definition.

Table 3: Views of support and concern about the problem definition.

Submitter type/preference	Total	Support problem definition	Express concern	Not directly stated
Tangata whenua	7	1	1	5
ENGOS	8	1	2	5
Recreational NGOs	15	2	6	7
Business and business organisations	24	1	7	15
Statutory bodies	18	7	3	5
Individual	94	3	10	81
Total	166	15	29	119

49. Themes and points raised by submitters about the problem definition included that:
- other barriers to reclassification are:
 - a lack of funding to do the work [this was most cited]
 - a lack of political priority
 - too much complexity
 - funding has been directed to other projects that have required more urgent attention

- there is the potential for DOC to deprioritise other work, which is a concern
 - mining interests could influence the reclassification process, which is a concern
 - a lack of reclassification options, such as co-governance options, could also have been a barrier, which could have contributed to the delay – elaborating on this, the Ngāi Tahu response spoke to a need for new classifications that may provide for access, protection and use of land in line with Ngāi Tahu values and interests
 - work should have been undertaken from the start.
50. A couple of submitters considered that the remoteness and size of stewardship land should not be such a barrier now there is technology with potential to speed up surveying – for example, light detection and ranging surveying (LiDAR).
51. Another submitter said there has not been a full evaluation of the problem, so it is difficult to know if the proposed objectives and change options will be justified.
52. Submissions from the farming sector noted that the lack of reclassification and the current process have created anxiety over the ability to maintain farming ventures in the future.
53. Others noted a possible problem that land people may have wished to purchase could now be unsuitable for purchase (eg subject to weed and pest problems).
54. The following comment reflects a few common themes.
- The current process is not broken. It appears the main reasons that it has not been successful is the lack of funding for DOC for this function, and lack of clear Political direction.

(Christchurch 4WD Club, Individual Group I)

Option 1.1: Shorten the period that the panels must allow for public submissions to 20 working days

55. The discussion document asked submitters:
- to indicate a preferred option between a 20-working-day time period and the status quo of 40 working days, with any analysis or comments to support the choice; and
 - if 20 days were adequate or what other timeframe would be adequate.

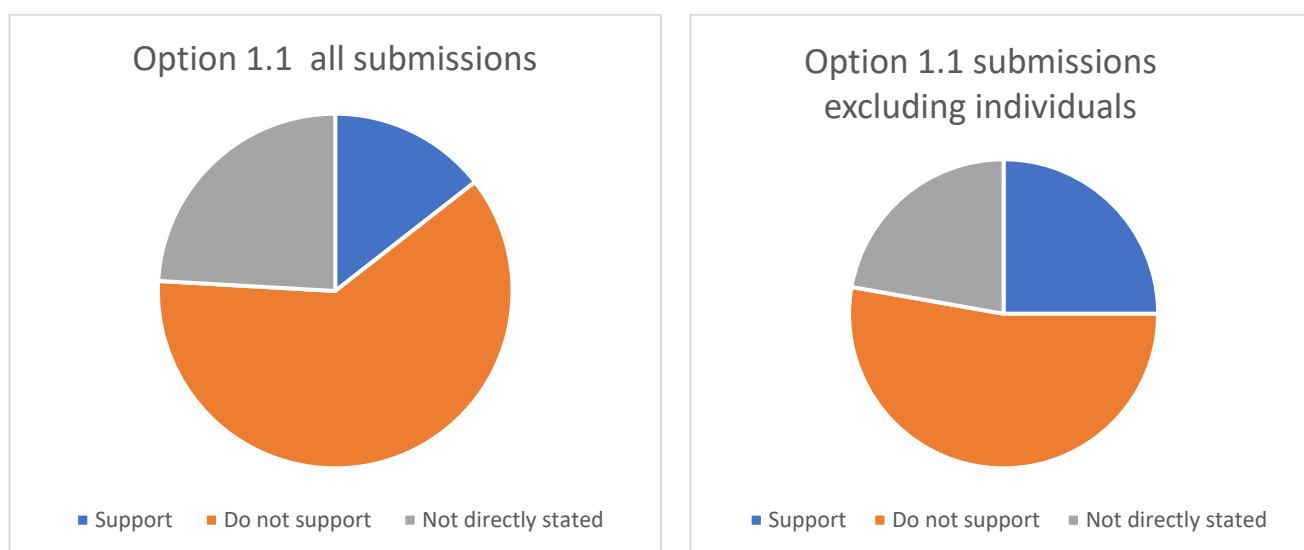
56. Views ‘in support’ and ‘not in support’ for this change option are set out in Table 4. There was relatively little support for this change option, with most submitters preferring the status quo.

Table 4: Views on option 1.1 20-day consultation.

Submitter type/preference	Total	Support change option	Do not support/ prefer status quo	Not directly stated
Tangata whenua	7	3	2	2
ENGOS	8	1	6	1
Recreational NGOs	15	1	11	3
Business and business organisations	24	5	10	9
Statutory bodies	18	8	9	1
Individual	94	6	64	24
Total	166	24	102	40

57. Preference illustrations are provided for ‘all submissions’ and for ‘submissions excluding individuals’ because the individual submissions were a much larger group and so skewed the total. This applies to all the preference illustrations.

Figure 1: Preference illustrations for option 1.1 20-day consultation



58. Submitters who supported the 20-day option said their support was subject to:
- good notice of the consultation in any area and prompt communication with key stakeholders
 - early engagement with tangata whenua and/or tangata whenua views being considered earlier in the assessment process
 - early engagement with concession holders
 - extended time periods for more complex areas.
59. A couple of submitters noted the potential for increased use of technology to canvas views within a shorter submission time.
60. Submitters who were not in support were satisfied with the status quo of 40 days, whereas a couple of submitters suggested a longer time-period or an interim period like 30 days. One submitter noted that tangata whenua may need 3 to 6 months.
61. Submitters who did not support the 20-day option said that:
- it is not enough time to prepare submissions and for DOC to have meaningful engagement
 - large entities have resources and professionals to participate, whereas voluntary groups and individuals are more likely to miss out
 - public participation will be reduced
 - shortcuts can increase costs in the long run, and limited time for engagement will open legal risks for DOC
 - monthly board meetings make responding in short periods challenging
 - administrative barriers should be addressed before reducing public time
 - the minimum can become the default
 - complexity has been the problem, not the consultation time.
62. The following quotes show common views about the 20-day option.
- The problem definition does not identify the public consultation phases as a key contributor to the lack of reviews to date.

(Forest and Bird)

... do not support the notion that just because it may add time and cost to what is already a long consideration outside the public eye, a government agency should be enabled to shorten the time required for a reasonable consideration.

(New Zealand Institute of Forestry)

... should be widely notified for some weeks to be exposed to the scrutiny of local knowledge of not just what values may be on the ground but also what values may be required by future generations.

(Basil Graeme)

Option 1.2: Allow the ability to decline a hearing where holding the hearing would cause substantial delay to the process or cause substantial burden on the resources of the panel

63. The discussion document asked submitters:
- to identify a preferred option between the status quo (hearings) and panels being able to decline a hearing
 - what role or function hearings currently play
64. There was limited support for the option to decline a hearing (10 of 91 who submitted on this topic) and no majority in any type of organisation. There is no illustration for this topic as the relatively low support is clear.
65. Submitters noted the value of hearings (refer below) and said that to save time is not a valid reason to decline a hearing and then panels are not representative, so others need to be heard.

Table 5: Views on option 1.2 ability to decline a hearing.

Submitter type/preference	Total	Support change option	Do not support/ prefer status quo	Not directly stated
Tangata whenua	7	0	3	4
ENGOS	8	0	5	3
Recreational NGOs	15	1	5	9
Business and business organisations	24	4	7	13
Statutory bodies	18	3	12	3
Individual	94	2	49	43
Total	166	10	81	75

66. Submitters who supported the change option (to be able to decline a hearing) said support was subject to:
 - cases where there are no opposing submissions, all submissions support a proposal or no submissions being lodged
 - only one or two parcels of land that are unlikely to be controversial being involved
 - criteria being publicly available and an objection process being in place
 - elevation to a higher conservation status being almost beyond debate.
67. Other submissions suggested the ability to limit the number of hearings for each parcel of land or deciding jointly with the NZCA and local conservation board if hearings are necessary and/or holding them jointly.
68. Several submitters, including local government and conservation boards, noted that online hearings are now being used successfully, and this saves submitter and hearing body time and resource.
69. One submitter noted mixed feelings about hearings because experts are paid to participate while volunteers may struggle to find time to participate.
70. Related to the function of hearings, submitters argued that hearings provide the opportunity:
 - for questions and answers and clarifications
 - for both submitters and those conducting the hearing to gain more knowledge and insight
 - to meet *kanohi ki te kanohi* which Māori may prefer if they are in the submission process instead of at the decision-making table
 - to have a say about land and values that are often very precious to those submitting
 - for those who are less strong at writing
 - to convey different and helpful insights through multiple lenses
 - for a fundamental democratic right that supports public participation
 - to provide local knowledge and insights into the process
 - for complex submissions to be heard and discussed
 - for those affected to be heard and be visible.
71. The importance of *tangata whenua* involvement in all aspects of decision making was also noted, irrespective of hearings.
72. The following quotes show some common views about the option to decline a hearing.

The right to be heard by the panel in support of one's submission and scrutinise evidence presented is fundamental in most forms of government and when dealing with public estate in NZ. We consider that this right should be maintained and protected.

(NZ Energy)

If the regulatory tweaking process continues as per the current consultation process we ask that the criteria used by the review panel to decide on whether or not a public hearing occurs, be developed and shared with the public. This will improve transparency and allow the public to better understand the risk of this proposed regulatory change.

(Te Hiku Conservation Board)

The function of a hearing is clearly set out in S49 of the Conservation Act. A hearing focuses on 'objections' ... hearings should be about objections to government proposals.

(Environmental Law Initiative)

73. The following two quotes from one submitter bring together several themes and points raised by many submitters about options 1.1 and 1.2 and consultation and reclassification in general.

Public interest in the DOC estate is growing and being fuelled by Climate Change, with the need for forestry as a carbon sink, the protection of erodible land, flood protection through reduced runoff, outdoor tourism, and the public desire for the significant regeneration of native bush. With that level of interest, the potential for public backlash is significantly greater than for previous years.

(John Wilson Harris)

If reclassifications are carried out without formal hearings, there is a high potential for challenges to the findings which will have severe consequences in terms of both time and costs.

(John Wilson Harris)

Option 2: Amend the Conservation Act to enable the National Panels to carry out the public notification and submission/hearing process

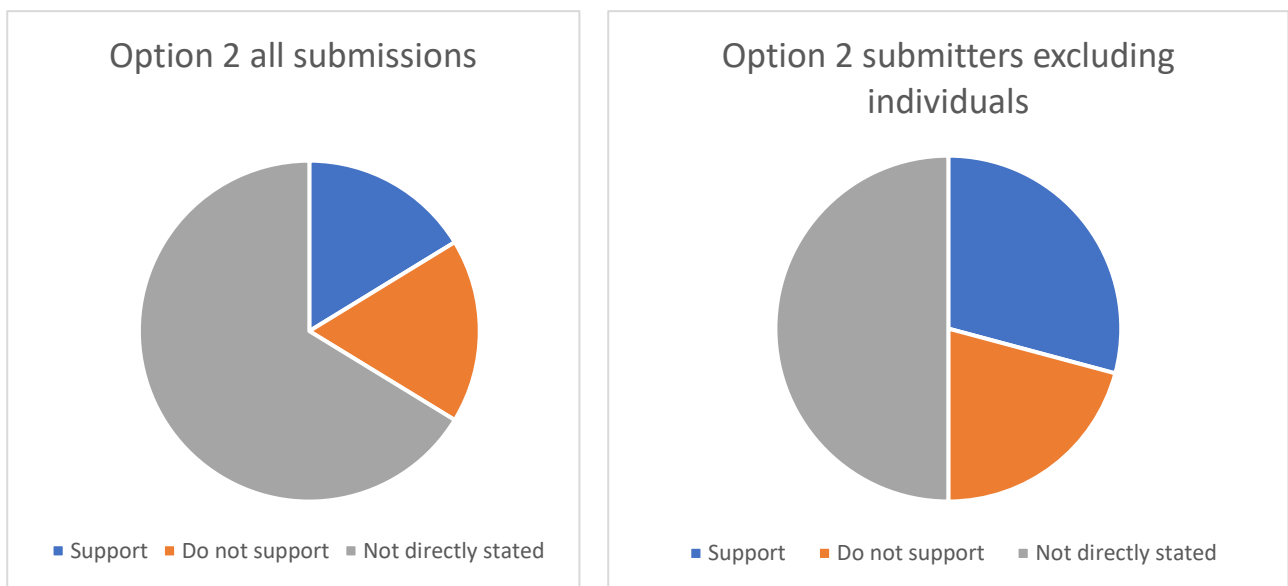
74. The discussion document asked submitters:
- to identify a preferred option (between panels and the status quo where DOC carries out the public notification and submissions process)
 - about the impact the change option could have on reclassification and disposal
 - to identify any other options that would meet the objectives.

75. There were 56 responses to this option, and nearly half of which were in support, with relatively more support from business organisations. Some submitters said they did not express a preference as they felt there was not enough information about how the process would work under either option.

Table 6: Views on option 2 enable National Panels to conduct consultation

Submitter type/preference	Total	Support change option	Do not support / prefer status quo	Not directly stated
Tangata whenua	7	4	1	2
ENGOS	8	1	2	5
Recreational NGOs	15	4	5	6
Business and business organisations	24	8	1	15
Statutory bodies	18	4	6	8
Individual	94	6	14	74
Total	166	27	29	110

Figure 2: Preference illustrations option 2 enable National Panels to conduct consultation



76. Submitters who preferred the change option (National Panels) said it could:
- reduce double handling and speed up decision making
 - enable more direct contact between submitters and the panel, improving good faith discussion and reducing opportunity for institutional bias
 - enable more independence and any conflict of interest for DOC
 - enable costs to be better identified.
77. Several submitters noted that the change option would need the panels to be well resourced to be successful and noted the considerable work involved in collating, summarising and analysing submissions.
78. Others considered that any new powers should be in legislation, with concern about delegating any powers to the National Panels with fewer accountabilities than DOC, the NZCA and conservation boards. There needs to be transparency about the work and responsibilities of the National Panels in the status quo and under change options, including who they must consult with.
79. Submitters who did not support the change option (National Panels) noted concerns about or considered that:
- time and costs will be the same whether a panel or DOC does the work
 - DOC will need to provide a lot of the information anyway, and is well known and is better suited to oversee a national process
 - the potential for panel membership changes and loss of institutional expertise is a risk over time
 - it is important to ensure transparent record-keeping responsibilities under the Official Information Act and the Privacy Act and meeting other statutory requirements for transparency
 - it will duplicate an already inefficient process
 - there is a risk of confusion if the respective roles of the panels, NZCA, DOC and the Minister of Conservation are not extremely clearly demarcated
 - panels will get bogged down in process rather than applying expertise
 - it is important to keep decision making local
 - the composition of the panels may lead to bias towards conservation values at the cost of economic values.
80. The following are quotes showing common views about the consultation process.

The present statutory provisions, whose checks and balances are well-tested in Parliament and in practice, and whose outcomes have largely stood the test of time, are preferable.

(Federated Mountain Clubs)

The Environmental Defence Society considers that there is a greater risk of a perceived lack of independence if the National Panels are responsible for public notification and submission processes. For example, a national panel's decision to not extend a public submission period, or to decline a reclassification hearing, could be seen as self-serving. A high number of reclassification recommendations undertaken in a short timeframe may be used to demonstrate the National Panels' success. Given that reclassifying land in the past has been fraught with challenges and delays there will be a lot of attention and pressure on the National Panels to provide results in a timely fashion.

(Environmental Defence Society)

The Runanga recently participated in a DOC hearing on the granting of a concession and found the process longwinded, drawn out, arduous, inefficient and under resourced. If the stewardship reclassification process was handed to a group who are specifically focused and resourced on the Kaupapa, it must improve efficiency of the process

(Ngati Tahu-Ngati Whaoa Runanga Trust)

Option 3: National Panels assume primary responsibility for the reclassification of stewardship land into national parks in consultation with tangata whenua, the NZCA and relevant conservation boards

81. The discussion document asked:
- what expertise/experience submitters consider the National Panels bring to the process (making national park recommendations)
 - risks associated with this option
 - any further options that DOC should consider.
82. There were a lot of comments about expertise/experience that submitters thought the panel could and should bring and a level of agreement with the required expertise of the panels as described in the discussion document (ecology, landscape, earth sciences, recreation, heritage, mātauranga Māori). Submitters mentioned recreation as being very important, with other aspects raised including 'balance between conservation experts, landowners and users', climate change expertise, fire risk knowledge, cultural expertise, knowledge of international experience and approaches, river use knowledge, and World Heritage criteria understanding.

83. Submitters also mentioned that the panels should work in consultation and be able to bring in experts and local knowledge. It was also proposed that concession holders have representation on the panels.
84. There was not a direct question about support for the change option for National Panels to make national park recommendations instead of the NZCA; however, some 45 submitters expressed a preference, 8 of these in support of the change option and 37 against (Table 7).
85. An illustration is not provided due to the alignment between individuals and other groups and the clarity of the preferences.

Table 7: Views on option 3 enable National Panels to make national park recommendations

Submitter type/preference	Total	Support change option	Do not support / prefer status quo	Not directly stated
Tangata whenua	7	2	2	3
ENGOS	8	1	1	6
Recreational NGOs	15	1	6	8
Business and business organisations	24	2	3	19
Statutory bodies	18	1	8	9
Individual	94	1	17	76
Total	166	8	37	121

86. Those in support of the change option noted that:
- the world has changed since legislation was passed and there is likely to be an alignment of views between panels and boards, so it is logical to streamline the process
 - they [panels] have relevant expertise and there is no more risk than with other statutory bodies making recommendations
 - their support was subject to iwi being fully included in the making of recommendations.
87. Submitters who did not support the change option were concerned about or noted the risk that:

- the option represents a major change that has not been fully analysed or the subject of any consultation – there needs to be a review of current process and problem identification before an alternative is put forward, and the full implications of change should be explored
 - analysis is needed on how section 4 directives will be met, noting, for example, that in the status quo, Ngāi Tahu has a seat on the NZCA
 - there is the potential for:
 - bias and capture by business interests and lobby groups
 - the loss of public access if the panels reclassify significant land as national park
 - varied consistency around the country.
 - reclassification to national park should remain a rigorous and public process and should not be delegated
 - a nohoanga entitlement under the Ngāi Tahu Claims Settlement Act 1998 cannot be created in a national park – this affects the ability of tangata whenua to maintain the ancestral relationship with place and customary practices
 - there is no guarantee of better performance relative to the NZCA
 - there may be public perception that national parks give ultimate protection, but conservation boards understand the wider implications
 - this would result in loss of considerable work in progress with NZCA and conservation boards already tasked with this and progressing advice.
88. Risks noted independently of preferences included that:
- this option would undermine the advice of the NZCA and DOC and the risk of friction between the very experienced NZCA and new panels
 - national parks should be reserved for areas of national importance with iconic values and administering them comes at a cost
 - this would remove the statutory role and expertise of the NZCA in conservation, as well as community views and independent checks on DOC process and proposals
 - there would be a lack of transparency about how the panels would assess for national parks.
89. Submitters noted that national parks must be administered and maintained so that they are preserved as far as possible in their natural state. Designation as a national park would mean a greater range of existing rights would either be impaired or confiscated. Related to this, submitter concerns included that a shift away from the status quo could lead to national park recommendations that do not require the current levels of

rigorous analysis or incorporate wider social, economic, cultural and environmental considerations [under the policies the NZCA must consider].

90. Government announcements about ‘no new mines’ on conservation land were also mentioned, with concern about the status and development of policy, and the potential for national park designations to be used in lieu of clear policy about new mining.
91. In areas like South Westland, every aspect of life is intrinsically and strongly linked to land use, so community and economic activity should be considered as communities could be destroyed depending on reclassification. This view came through from Federated Farmers, concession holders (regarding historic grazing runs dating to the 1800s), mining companies and councils on the West Coast of the South Island.
92. It was also proposed that options other than national parks be considered when conservation values are high (eg QEII protection).
93. The following quotes reflect commonly expressed views about the national park option.

The composition of the Panels is fundamentally flawed by not providing for members with expertise or experience to enable proper assessment of the social or economic value of stewardship land to users and the wider community. This should include the assessment of such matters as biosecurity from managed grazing areas, appropriate net conservation or biodiversity gain from alternative uses of parcels of land, community sustainability and resilience, and wider cultural and social values.

(West Coast Regional Council, Buller District Council, Grey District Council and Westland District Council – from joint submission)

... the existing ‘Conservation Boards’ and the New Zealand Conservation Authority (NZCA) can undertake this work and have the necessary statutory mandate to take on this review. Especially given that the Conservation Boards have the requisite local knowledge and iwi representation to undertake the work and in the last ten years they have been tasked by the Minister to make recommendations regarding the most significant stewardship land in their jurisdictions ... many conservation boards have already done considerable leg work in this space and this work should be built on rather than reinventing the wheel.

(Realnz Limited)

This question [if National Panels were to make recommendations on national parks] presupposes that stewardship land will, to a limited or great extent, be reclassified as national parks. Minerals West Coast is deeply concerned at this prospect given that it would immediately mean such land would be effectively off-limits for mining, and would, in practice, mean the stewardship land review could in effect deliver ‘no new mines’ on conservation land by another name for potentially large areas of the conservation estate, without adequate public consultation or consideration of broader policy issues surrounding mining, for example, the proposed critical minerals list, and broader conservation law reform ...

If that is not the government’s intention, then every effort should be made to mitigate this risk.

(Minerals West Coast)

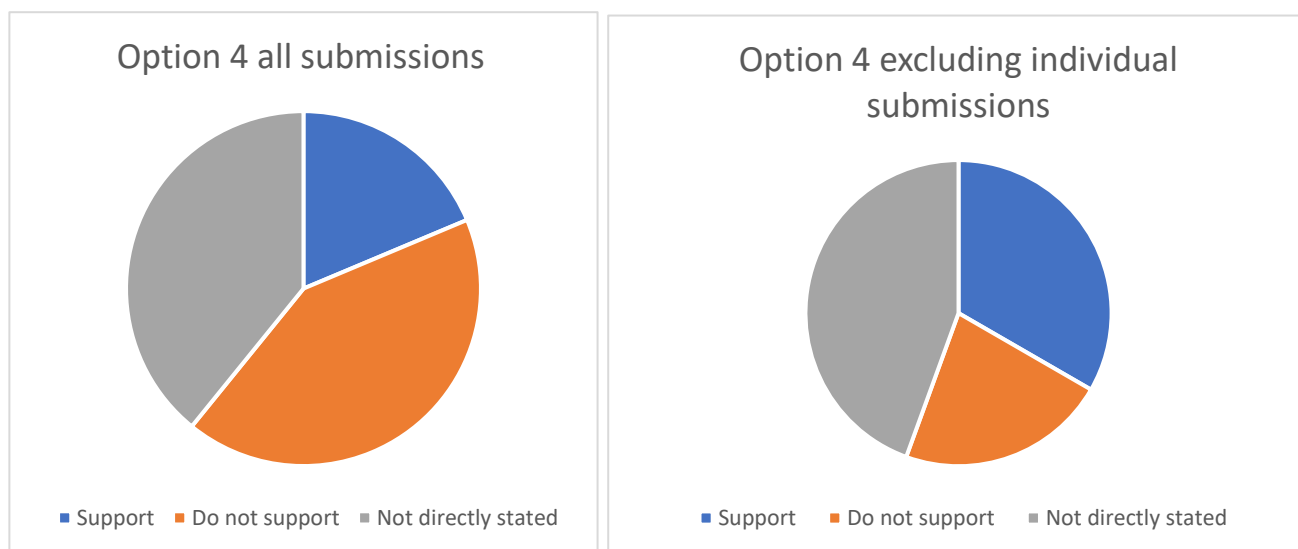
Option 4: Declare all stewardship land under section 62 of the Conservation Act to be held for conservation purposes via a legislative change

94. Questions in the discussion document asked submitters to identify:
- a preferred option (the 4.1 change option relative to the status quo that land needs to be declared by Gazette notice to be held for Conservation purposes under section 7 of the Conservation Act before it can be reclassified or considered for disposal)
 - identify possible alternatives and risks associated with the change option.
95. Statutory bodies and business organisations were relatively supportive of the change option, whereas other groups were not. Opposition from individual submitters was based on a perception that the proposed change option would lead to the disposal of conservation land and reduced public access.

Table 8: Views on option 4 amend legislation for land to be held for conservation purposes

Submitter type/preference	Total	Support change option	Do not support / prefer status quo	Not directly stated
Tangata whenua	7	1	3	3
ENGOS	8	3	2	3
Recreational NGOs	15	3	7	5
Business and business organisations	24	7	3	14
Statutory bodies	18	10	1	7
Individual	94	7	54	33
Total	166	31	70	65

Figure 3: Preference illustrations option 4 amend legislation for land to be held for conservation purposes



96. Individual submitters who supported the change option noted that the support was conditional on being certain that land could not be disposed of without public consultation under section 49 of the Conservation Act.
97. As noted above, those not in support were mostly concerned about the perceived potential for easier sale of land and loss of access – especially for land that may have low conservation values but high recreational values.
98. Some submitters noted that the Gazette process was a check, but that they were unsure whether the public routinely saw Gazette notices anyway.
99. The West Coast councils supported the option but noted concern about the loss of context for how the land came to DOC in 1987, and failure at that time to take account of grazing runs and the historic use of grazing runs.
100. Several submitters mentioned a risk that some land could become classified as conservation land indefinitely when other uses may be more appropriate and a conservation classification may not have been intended or be appropriate. In 1987, the category of stewardship land was in good faith understood to be a temporary holding with protections, while a full process was undertaken at a later date – so a one-size-fits-all approach now negates the previous understanding. At minimum it would be reasonable to check land held under grazing licence.
101. Another set of views noted that the value of land has changed, with new discoveries and new potential with regard to climate change, biodiversity and new scientific understanding.
102. The following are some of the alternative approaches proposed by submitters.

- Declare land to be reinstated to tangata whenua by legislative change, or held for tangata whenua and communities as kaitiaki (Te Rūnanga o Whangaroa).
 - Repeal section 62 of the Conservation Act so land does not need to be held for a conservation purpose before it is reclassified or disposed of (Straterra, Bathurst Resources and BT Mining Ltd).
 - Prioritise and bundle selected high conservation areas (David King)
 - Take an incremental approach by starting to bundle Gazette notices when they are ready rather than waiting for all the parcels of land in an area (Tasman District Council).
103. Other submitters considered that it could be an incorrect interpretation of the law if land needs to go through the section 7 declaration before it may be reclassified or considered for disposal (Forest and Bird, Environmental Law Initiative, Environmental Defence Society). An alternative is that only land to be considered for disposal would need to go through the declaration process.

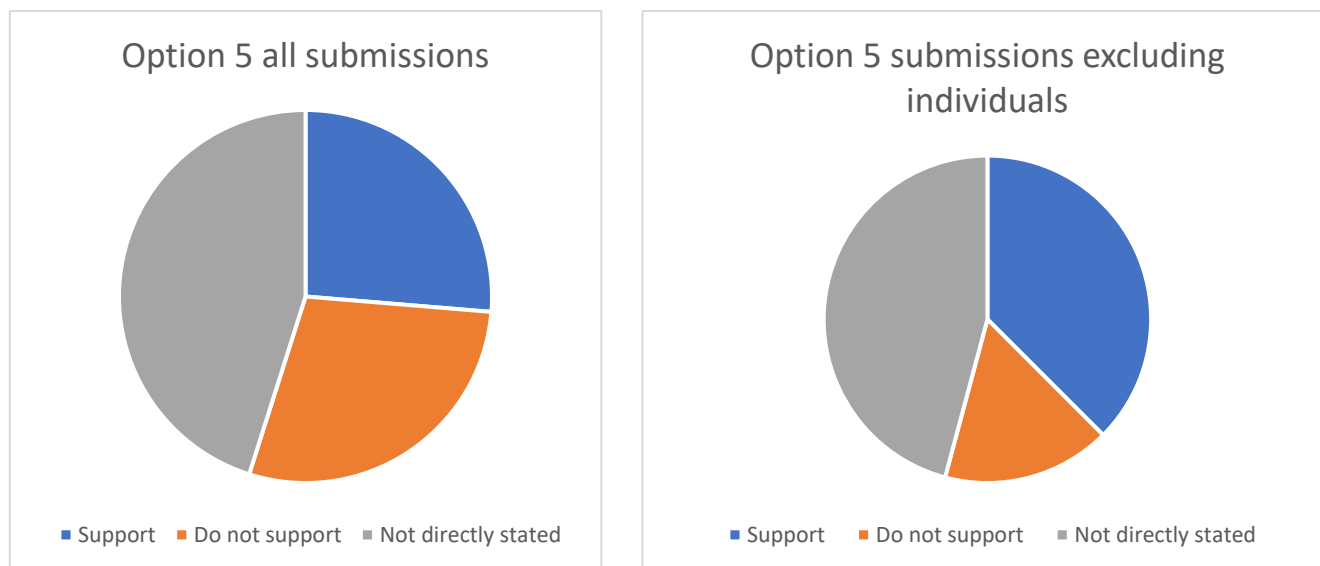
Option 5: Amend the Conservation Act to allow the Minister of Conservation to direct the proceeds of sale of stewardship land to DOC for further reclassification and management activities

104. The discussion document asked submitters to identify:
- preferred options (the change option relevant to the status quo of proceeds being directed to the Crown trust account)
 - analysis and comment supporting preferences, including risks.
105. Business organisations, ENGOs and statutory bodies that expressed a preference were more in support than not. Recreation organisations and individuals were less supportive of the change option.

Table 9: Views on option 5 enable return of any sale funds to DOC

Submitter type/preference	Total	Support change option	Do not support / prefer status quo	Not directly stated
Tangata whenua	7	4	2	1
ENGOS	8	4	1	3
Recreational NGOs	15	3	7	5
Business and business organisations	24	7	2	15
Statutory bodies	18	9	0	9
Individual	94	8	26	60
Total	166	35	38	93

Figure: Preference illustrations option 5 enable return of funds to DOC



106. Regardless of preference, many submitters were concerned that DOC could be expected to raise revenue from sale of land and said this should never be a substitute for adequate funding. They considered that the work should be clearly funded for DOC to be able to plan and progress the work.

107. Those in support of the option said:

- It is a good option as it will prevent the so the reclassification work from taking resources away from other priorities
 - there are suitable checks and balances, with the Minister of Conservation being held to account by Cabinet and Parliament
 - the independence of Panels would mitigate any perverse incentive for sales.
108. Tangata whenua in support noted that this was subject to proceeds remaining in the rohe, and mana whenua participation in decision making.
109. Those not in support of the option saw a perception risk for DOC and that, regardless of checks and balances, DOC could be perceived to be undertaking sales to fund other work. The system of returning funds to the Crown (eg New Zealand Police and speeding fine revenue) is more typical and transparent.
110. Submitters also mentioned that:
- other Crown uses could have priority (eg health, education)
 - there could be outliers, where land has exceptional value (eg in the case of mineral deposits), and such cases may need a division of funds.
111. Submitters also proposed that the costs of survey and preparing land for sale be met by the purchaser.
112. There were several suggestions for alternative uses of any proceeds of sale – for example, directing funds to the Nature Heritage Fund, the Conservation Partnership Fund or another independent body, or to wider conservation work.

Option 6 (status quo): Concessions on stewardship land decided on a case-by-case basis and can continue unless parties agree otherwise, or (change) amend legislation to clarify that concessions can continue regardless of classification

113. The discussion document asked submitters to:
- identify a preferred option between the status quo and legislative change
 - consider what should happen if a concession on stewardship land is inconsistent with a new classification – mainly, if inconsistent concessions should be reviewed or allowed to continue
 - identify any risks and further options.
114. Some submitters purposefully did not to state a preference, wanting to include flexibility either way or proposing other options. A couple of

submitters said they did not support either option, as both options favoured concessionaires. Several submitters provided detailed comments independently of preference. These comments are noted by theme below.

115. There were only a few comments about the risks of allowing inconsistent concessions to continue with one submitter mentioning biodiversity, and a few others saying there were risks to conservation values, but not providing specific details
116. Relatively more business and statutory bodies preferred the legislative change option, with a handful of supporting submissions in other groups.

Table 10: Views on option 6 amend legislation to enable concessions to continue

Submitter type/preference	Total	Support change option	Do not support / prefer status quo	Not directly stated
Tangata whenua	7	2	2	3
ENGOS	8	1	1	6
Recreational NGOs	15	2	7	6
Business and business organisations	24	8	2	14
Statutory bodies	18	5	6	7
Individual	94	4	22	68
Total	166	22	40	104

117. Submitters expressed separate views about whether inconsistent concessions should be able to continue in case of reclassification or be reviewed. Businesses and some statutory bodies considered that inconsistent concessions should be able to continue on existing terms and conditions (without necessarily being reviewed).

Table 11: Preferences about continuing concessions if they become inconsistent with a reclassification

Submitter type/preference	Total	Support review	Support continuing	Not directly stated
Tangata whenua	7	2	1	4
ENGOS	8	4	0	4
Recreational NGOs	15	6	0	9
Business and business organisations	24	0	8 (plus 7 ⁶)	9
Statutory bodies	18	5	5	8
Individual	94	23	1	70
Total	166	40	22	104

118. The main views in support of legislative change were that it would provide certainty for concession holders and the ability to plan. Submitters who supported the status quo also supported degrees of concession review when land is reclassified, either through a matrix approach or a careful approach to both meet legal requirements and amend or phase out concessions.

119. The following themes and points were raised about concessions.

Treaty of Waitangi / tangata whenua

- There must be consultation with mana whenua about concessions on land in their rohe and in line with any Treaty settlement, portfolio accord and/or conservation relationship agreements.
- Tangata whenua should be making decisions and/or tangata whenua needs should be considered first.

Context - history and importance to communities/grazing concessions

- Consider the history of concessions - farms in South Westland are reliant on grazing concessions dating back more than 100 years - strong history of co-existence of commercial and conservation values due to low stocking rate farming, public and recreation access, and good management.

⁶ Seven submitters noted the importance of concessions to their livelihoods and communities, without expressing a direct preference. These are noted here as likely to be aligned with support for allowing concessions to continue.

- Small, remote communities are reliant on farming, and these communities and facilities are also relied on by those accessing conservation areas.
- There is a history of land being set aside for grazing, and some of this is now in stewardship land.
- Consider the sale of grazing land to farmers and funds used to purchase land with conservation value.
- Consider establishing a pastoral land classification.
- Uncertainty is stressful for those who depend on concessions as part of their livelihood.

Context - high-value assets on public conservation land

- Submitters from the energy and telecommunications sectors noted that there are high-value assets vital to the National Grid and communications.
- The mining sector noted that the minority of conservation land is affected by mining (0.04%).
- Local government noted vital water concessions.

Concession conditions

- Concessions tend to have stringent conditions already for the management of conservation outcomes alongside the activity and should still be suitable after reclassification.
- In many cases the effect will have already taken place (eg the building of a road), as well as any mitigations.
- It is important that contractual agreements are upheld.
- A moratorium should be proposed on new concessions and the renewal of concessions on stewardship land once a reclassification recommendation has been publicly notified.

On the ground effort is important, not the classification or concession

- It is on the ground effort that protects conservation values, not necessarily the classification.
- Recreational and commercial activities can work successfully alongside conservation values and enhance these values (eg restoration work by recreational users, concession conditions for mining, land access for hunting, grazing suppression of weeds).

Other environmental/conservation outcomes

- Concessions may have other environmental outcomes (eg quarrying on conservation land for use in nearby DOC flood mitigation work, river restoration and tracks to support conservation outcomes with minimal transport emissions).

Alternatives and operational approaches

- Concessions should include clause that covers what will happen in the event of reclassification.
- There should be a matrix approach for different types of classification and concession activity to provide a consistent approach for deciding concessions and managing changes in classification.
- If inconsistent, concessions should be stopped in a legal way, with reasonable time periods for change; periods of 3-5 years were suggested.
- The panel assessments should propose possible changes to concessions.
- The panel assessments should consider all available information on ecological, historical and recreational values.
- There should be a distinction between recreation access and other commercial access.

Crown Minerals Act 1991

- Concessions under the Crown Minerals Act should also be reconsidered if land is reclassified and in scope of the review of stewardship land (ENGO view, including FMC, Forest and Bird).

120. The following quotes express views stated by several submitters.

It is not possible to be categorical about whether and to what extent concessions can continue following reclassification or decisions to dispose of land. Some flexibility needs to be built into the system to meet particular circumstances and the public interest. Rights may be affected and the effects of abrupt change may be complex and have unintended consequences.

(Harper Pass Limited)

In short, a failure to address concession damages the integrity of the reclassification process and treats stewardship land like private land.

(Environmental Law Initiative)

The risks associated with allowing inconsistent concessions to continue are outweighed by the benefits of getting on with classification.

(Realnz Limited)

[allow at least 3 years to develop alternatives] ... for example, an existing concession may allow some form of tourist or recreation activity that may not be appropriate after reclassifications as a reserve or national park. Such activity may provide the only means of practical access. It would be neither appropriate to allow

it to continue following reclassification nor cancel it without a reasonable notice period to allow alternatives to be sought and approved.

(Walking Access Commission)

[Application of a] legal status and names does not necessarily relate to successful conservation outcomes. Tenure review saw much land returned for conservation purposes but with the removal of any grazing management, the perverse outcome of accelerated wilding spread resulted in some areas, creating a substantive ongoing public liability. Repetition of such mistakes must be avoided and transparent monitoring and reporting inclusive of funds allocated for the conservation purposes on these lands should be being monitored and reported.

(New Zealand Institute of Forestry)

Non-regulatory options

121. The discussion document outlined non-regulatory work about land survey requirements, a memorandum of understanding between DOC and the Ministry of Business Innovation and Employment (MBIE) about mining, and the potential to bundle Orders in Council. The document also asked submitters to identify any other non-regulatory options to help streamline the process for reclassifying stewardship land.
122. In response to this question, individual, business and local government groups shared mixed opinions regarding mining on stewardship land. Some were concerned that the operational agreement between DOC and MBIE would result in the mining sector receiving special consideration during the reclassification process, while another suggested that MBIE should inform the National Panels of mineral value on stewardship parcels.
123. Tangata whenua suggested the addition of a disposal matrix and the inclusion of Waitangi Tribunal advice during the reclassification of each parcel.

Implementation and other matters

124. The discussion document described operational work and planned evaluation and monitoring of change and asked submitters to note any additional evaluation or monitoring measures.
125. Most of the matters raised in this section had already been mentioned alongside the change options. Other comments and suggestions included the following.
 - Submitters from the individual, business and ENGO groups suggested that a method to evaluate the reclassification process and the legislative amendments should be implemented.

- Business groups submitted that a transitional land classification should be established to allow for private activities to either expire or continue.
 - Individuals suggested investing in the reduction of survey costs and raised concern over the lack of clear policy intent related to mining interests.
 - Tangata whenua highlighted the importance of incorporating local knowledge in the reclassification process.
126. It was also mentioned in this section and alongside other topics that the reclassification process needs to be adequately resourced. This should also extend to resourcing participants, including Treaty partners, to participate in the reclassification process.

END

Appendix A: List of submitters

Tangata whenua – whānau, hapū and iwi, and organisations	<ul style="list-style-type: none"> • Maniapoto Māori Trust Board • Ngati Tahu Ngati Whaoa Runanga Trust • Te Korowai o Ngāruahine Trust • Te Rūnanga o Ngāi Tahu • Te Rūnanga o Whaingaroa • Te Runanga o Ngāti Whare • Tūhourangi Tribal Authority: affiliate entity to Te Pumatanga o Te Arawa
Environmental non-government organisations (ENGOS)	<ul style="list-style-type: none"> • Coromandel Watchdog of Hauraki • Environmental Defence Society • Forest and Bird • Rewild Aotearoa • Takaka Hill Biodiversity Group Trust • Wellington Botanical Society • Central Otago – Lakes Branch of Forest and Bird • Environmental Defence Society • Environmental Law Initiative
Recreational non-government organisations (recreational NGOs)	<ul style="list-style-type: none"> • Aotearoa Climbing Access Trust (ACAP) • Canterbury White Water Club • Central Otago Deerstalkers Association • Central Otago Recreational Users Forum • Federated Mountain Clubs (FMC) • New Zealand Alpine Club (NZAC) • New Zealand Deerstalkers Association • Whitewater New Zealand • <i>Four-wheel-drive (4WD) clubs</i> • Canterbury Jeep Club • Christchurch 4WD Club • Combined 4WD Club Inc • Mid-Canterbury 4WD • New Zealand 4WD Association • NZ4WD Southern Zone Pro
Business and business organisation	<ul style="list-style-type: none"> • Aggregate and Quarry Association • Bathurst Resources Ltd and BT Mining Ltd • Development West Coast • Federated Farmers • Minerals West Coast • New Zealand Institute of Forestry • NZ Energy • OceanaGold Corporation

	<ul style="list-style-type: none"> • RealNZ Limited • Rockies Mining Ltd • Straterra • Transpower • Trustpower • Vodafone
Business organisations – farm and bach concessions	<ul style="list-style-type: none"> • Courtney Landreth • David and Bernadette Friend • Future Farming South Westland (group of 29) • Harper Pass Limited • Landreth Farming Ltd • Lower Selwyn Hut Owners Association • Mathew Nolan (group of 6) • NM Williams, WP Williams, MH Sullivan, PH Halford • Thomas Condon and Catherine Montague • Waita Bach Owners
Statutory bodies – conservation boards	<ul style="list-style-type: none"> • Auckland • Bay of Plenty • Canterbury Aoraki • Nelson Marlborough • Northland • Southland • Te Hiku
Statutory bodies – local government	<ul style="list-style-type: none"> • Buller District Council • Grey District Council • Ruapehu District Council • Tasman District Council • Waikato Regional Council • West Coast Regional Council • Westland District Council
Statutory bodies – other	<ul style="list-style-type: none"> • Fish and Game • Nature Heritage Fund • Walking Access Commission
Individuals	<p>Alan Mackie, Andy O Loan, Angela Ashley Wilson, Anna Nathan, Annette and Michael Hamblett, Barry McDowell, Barry Meade, Basil Graeme, Bruce Stuart and family, Chris Ginders, Clare Backes, Clive Anstey, David Hodder, David King, DC Webster, Derek Stubbs, Diana Shand, Dr Gerry McSweeney CNZM, Dr Paul Blaschke, Fiona Jenkins, Fred Carter, Frida Inta, Gina Manson, Glenn Bishop, Graham Malaghan, Greg Nichols, Janet Dickson, Jeff Williams, John Wilson Harris, Karen Manson, Kathryn Bayliss, Kay</p>

	<p>Milton, Keith Morfett, Lee Short, Lesley Anderson, Linda Conning, Michael Hogg, Michael Peters, N. Hancox, Paul Elwell-Sutton, Paul McGahan, Paul Van Houtte, Peter Morrison, Rosalie Snoyink, Rosalind Goulding, Ryan Carr, Susan Hall, Susan Short, Suzanne Hills, Wayne Williams.</p> <p><i>These submitters sent in similar or form submissions, and are listed in groups depending on the submission:</i></p> <ul style="list-style-type: none"> • Group I: Jordan Brizzell, Constantine Harris, Corey Parker, Glenn Clark, Hugh Burnett, Patrick Branje, Andy Trestrail, Alex Musalov, Pete Paton, Matthew R Duffy, Hamish Purcell • Group II: Alan Geeves, Roger Unwin, Aaron • Group III: Peter-Ray Moroney, Jacques Olivier • Group IV: Lesley White, Nigel Thompson, Geoff Dunne, Gary Kilgour, Phil Davis, Lance Davis, Mark Franken, Arthur Moore, Cherie Luxton, Robin Lieffering, Fiona Mackenzie, M. Cahill, Jodi Coulston, Barry Tucker, Keith Woollerton, Glenn Bishop, Lesley Munro, Linda Cholmondeley Smith, David Peray, Helen and Graham Vivian, Frances and Patrick Murphy, Alison and David Lloyd, Robyn and Hugh Campbell
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Appendix B: Summary of preferences

This Appendix brings together information from Tables 4–10 and presents the numbers that the illustrations in the main document are based on. Preferences are provided for the total number of submissions and responses ($n = 166$) and then the number excluding the individual submissions ($n = 166 \text{ total} - 94 \text{ individual} = 72$). Tables in the body text show different submitter types and variation in more detail.

Option 1.1: 20-day consultation

All submitters $n = 166$

Support	24	14%
Do not support	102	61%
Not stated	40	24%

Excluding individuals $n = 72$

Support	18	25%
Do not support	38	52%
Not stated	16	22%

Option 1.2: Ability to decline a hearing

All submitters $n = 166$

Support	10	6%
Do not support	81	49%
Not stated	75	45%

Excluding individuals $n = 72$

Support	8	11%
Do not support	32	44%
Not stated	32	44%

Option 2: Enable National Panels to conduct consultation

All submitters $n = 166$

Support	27	16%
Do not support	29	17%
Not stated	110	66%

Excluding individuals $n = 72$

Support	21	29%
Do not support	15	21%
Not stated	36	50%

Option 3: Enable National Panels to make national park recommendations

All submitters n = 166

Support	8	5%
Do not support	37	22%
Not stated	121	73%

Excluding individuals n = 72

Support	7	10%
Do not support	20	28%
Not stated	45	63%

Option 4.1: Amend legislation for land to be held for conservation purposes

All submitters n = 166

Support	31	19%
Do not support	70	42%
Not stated	65	39%

Excluding individuals n = 72

Support	24	33%
Do not support	16	22%
Not stated	32	44%

Option 5: Enable return of any sale funds to DOC to cover costs of reclassification

All submitters n = 166

Support	35	21%
Do not support	38	23%
Not stated	93	56%

Excluding individuals n = 72

Support	27	38%
Do not support	12	17%
Not stated	33	46%

Option 6: Amend legislation to enable concessions to continue

All submitters n = 166

Support	22	13%
Do not support	40	24%
Not stated	104	63%

Excluding individuals n = 72

Support	18	25%
Do not support	18	25%
Not stated	36	50%

END