

In Confidence

Office of the Minister of Conservation

Cabinet Environment Committee

Public consultation on options to improve conservation management processes

Proposal

- 1 This paper seeks agreement to initiate public consultation on options for targeted amendments to improve conservation management processes.

Relation to Government priorities

- 2 Targeted improvements to conservation management processes will ensure that public conservation land and waters are appropriately managed to protect and restore conservation values. Proposals would enable improved processes for updating statutory planning documents and managing concessions within the conservation management system. This supports the:
 - 2.1 **Manifesto commitment** to protect, preserve, and restore our natural heritage and biodiversity, and promote the recovery of threatened species;
 - 2.2 **Co-operation agreement** to work with the Green Party to achieve the outcomes of *Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020*. In particular, the strategic priority, “Tūāpapa – Getting the system right” and goal 1.3, “Current natural resource legislation has been reviewed to ensure it is effective and comprehensive...and ensures ongoing biodiversity protection”.

Executive Summary

- 3 In October 2021 Cabinet agreed in principle to preparatory work toward future reform of conservation legislation, including initiating a review of the Wildlife Act 1953. It also agreed to progress targeted amendments to conservation management planning and concessions legislation.¹
- 4 This paper seeks approval to initiate public consultation and release a public discussion document outlining possible targeted legislative amendments to improve conservation management processes.
- 5 I will report back to Cabinet with recommended amendments following public consultation.

¹ CAB-21-MIN-0402 refers.

Background

- 6 *Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020* identifies that conservation legislation is complicated and often inconsistent. It is a web of 24 Acts, developed over nearly 70 years, that hasn't kept pace with conservation pressures like climate change and biodiversity loss, or our evolving understanding of Treaty principles. The Department of Conservation (**DOC**) is doing work internally to prepare for future reform of conservation legislation.
- 7 On 4 October 2021, Cabinet noted that while early preparatory policy analysis is underway to identify options for possible reform pathways, there are other opportunities to deliver direct, incremental improvements to address Government priorities. Cabinet agreed to progress targeted amendments to conservation management planning and concessions legislation. Initiating a review of the Wildlife Act 1953 was also agreed.²
- 8 This paper reports back with options for targeted improvements to conservation management planning, concessions, and other minor and technical amendments to conservation management legislation. I am seeking Cabinet approval to canvass these options through public consultation and the release of a public discussion document.
- 9 A Conservation (Management and Processes) Amendment Bill is on the legislative programme for 2022 as Category 4 (to be referred to select committee within the year).
- 10 In December 2016, a previous Government agreed to policy directions for some conservation management planning and concessions amendments.³ However, these were not progressed due to more pressing work being prioritised. Some of the suggested 2016 policy changes have been taken forward in the proposals for targeted amendments outlined in this paper.

Conservation management planning and concessions systems

- 11 The purpose of statutory conservation management planning documents is to guide the management of, and decisions on the use of, public conservation lands and waters (**PCL&W**). They include objectives and policies for places, and criteria for making decisions about DOC management activities or those requiring authorisation (e.g. concessions). They may also give effect to Treaty settlement obligations. DOC is accountable for delivering the outcomes described.
- 12 The Conservation Act 1987 sets out the statutory processes for developing and reviewing Conservation Management Strategies (**CMS**) and Conservation Management Plans (**CMP**). The National Parks Act 1980 sets out the statutory processes for developing and reviewing National Park Management Plans (**NPMP**).

² CAB-21-MIN-0402 refers.

³ EGI-16-MIN-0334 refers.

- 13 A concession is an authorisation to undertake an activity on PCL&W. Concessions come in the form of a permit, licence, lease, or easement. A broad range of activities require a concession, from commercial tourism to collecting samples for research. DOC manages over 4,600 active concessions and receives around 1,000 concession applications each year.
- 14 The Conservation Act 1987 provides a process for decision-making, while the relevant statutory conservation management planning documents determine whether an activity is appropriate for a specific place.

Rationale for targeted improvements to conservation management planning and concessions legislation

- 15 Conservation management planning and concessions are the primary mechanisms through which people interact with the conservation system. The decisions through these systems have environmental, social, and economic implications for tangata whenua, industry, environmental groups, communities, and individuals. However, complicated and dated legislation means that there are a host of issues within the legislation that have created systemic challenges to effectively managing public conservation land and waters.
- 16 Targeted amendments to improve conservation management planning and concessions processes and decision-making would better enable the current system to deliver conservation outcomes. Changes would provide benefits to tangata whenua, stakeholders, local government, and central government in the near-term, while work to prepare for possible conservation legislation reform is underway.
- 17 Additional improvements to the management planning and concessions systems will be progressed through partial reviews of conservation general policy, the review of the Wildlife Act 1953, and continuous improvements to DOC's operational delivery.⁴

Public consultation will focus primarily on improvements to management planning reviews and processes for managing concessions

- 18 I seek Cabinet approval to initiate public consultation and release a public discussion document to support legislative changes to improve conservation management processes. The proposed discussion document is attached at Appendix 1 (subject to minor edits and design changes). The discussion document asks for feedback on policy changes across three areas:
 - 18.1 Changes to improve the legislative process for developing and reviewing conservation management planning documents
 - 18.2 Changes to concessions legislation to improve efficiency and enable more proactive approaches to concessions management

⁴ The Conservation General Policy and General Policy for National Parks provide statutory guidance on the administration and management of places and resources, including concessions and conservation planning documents.

18.3 Minor and technical changes for the purposes of regulatory stewardship.

- 19 The discussion document provides options under each of these areas (including maintaining the status quo) and asks for public input on the best option to address them. The specific policy areas and options are outlined below.

Management planning policy changes

- 20 There is a significant backlog of conservation management planning documents overdue to be reviewed or developed. The pipeline of work is increasing as documents reach the end of the ten-year statutory timeframe and become due for review, and Treaty settlements require new documents or reviews to current documents. This backlog is not meeting statutory requirements and undermines public confidence in DOC.

- 21 This backlog is in part driven by the slow and resource intensive process for developing and reviewing planning documents. Frustrations with onerous process requirements are felt by tangata whenua, recreational users, businesses, and conservationists alike.

The requirement that CMSs, CMPs, and NPMPs are fully reviewed every ten years is contributing to the growing backlog of documents in need of full review or development

- 22 In addition to the status quo, I propose to canvass two options to improve the requirements for regularly reviewing planning documents.

22.1 Option 1: Remove the requirement that planning documents must be reviewed in full every ten years. Replace with a statutory check-in process at ten years to assess the need for a review and the scale of review required

22.2 Option 2: Extend the timeframe for full review of planning documents to twenty years.

Once a planning document is approved, it cannot be easily updated to reflect changing needs, new technology and evolving pressures

- 23 Conservation management planning documents are unable to quickly respond to changing circumstances, such as technological advancements, new pressures, or changing recreational preferences.

- 24 In addition to the status quo, I propose to canvass an additional option to introduce a streamlined process for updating existing planning documents.

24.1 Option 1: Introduce a new streamlined process for partially reviewing planning documents where public interest is limited.

The current statutory requirements for engaging the public in developing and reviewing planning documents is outdated and inflexible

- 25 In addition to the status quo, I propose to canvass three options to improve the public engagement process.
- 25.1 Option 1: Remove the unnecessary process step to publicly notify the intent to prepare or review a national park management plan
- 25.2 Option 2: Modernise and simplify the requirements for public notification and public engagement on a notified draft planning document, including:
- 25.2.1 removing the mandatory requirement to hold hearings; or
- 25.2.2 retaining a modified prescriptive requirement for engagement hearings process
- 25.3 Option 3: Modernise publication requirements for draft and approved planning documents.

Concessions policy changes

- 26 Concession applications affect a range of people, from tourism operators, to researchers, to farmers. Processing applications under the current statutory framework can be slow and costly. This creates a growing backlog of work and impedes prompt decision-making, which results in delayed or missed access to concession opportunities.
- 27 There is an opportunity to make targeted amendments to the part of the Conservation Act 1987 that deals with concessions, Part 3B, to enable more proactive and efficient concessions management without removing DOC's statutory ability to protect conservation values.

Processing concession applications can be a timely and costly process for all parties

- 28 The Conservation Act 1987 currently requires an individual concession application for concession activities, even where the effects are minimal and well managed.
- 29 I am considering a new mechanism that would authorise activities within specific locations or regions, rather than each concession for that activity being applied for individually. General authorisations would be more user-friendly and would reduce the incoming application numbers – allowing DOC's resources to be better focussed on processing complex or 'high-risk' applications where detailed assessments are required. In addition to the status quo, I propose to canvass an additional option to enable general authorisation of specific concession activities:
- 29.1 Option 1: Providing DOC the ability to make regulations that generally authorise activities.
- 30 In addition, I am canvassing a proposal which would enable concessions to be pre-approved for specific activities (i.e. applications could be made, and instantly approved, online). Current legislation is unclear on whether the Minister of Conservation can assess a specific activity in advance of an application being

received and then consistently apply that assessment to any future applications which meet the existing assessment parameters.

Improving DOCs ability to allocate and manage concession opportunities

31 The reactive nature of Part 3B encourages concession applications to be considered sequentially, resulting in a 'first come, first served' method. This impedes DOC's ability to identify and offer concession opportunities to the most suitable concessionaire. It is unclear if the Minister of Conservation can return an application in favour of running a competitive application process. In addition to the status quo, I propose to canvass two options to better enable competitive allocation of opportunities.

31.1 Option 1: Provide the Minister with the ability to return a concession application if initiating a tender process would be more appropriate

31.2 Option 2: Same as option 1, but with a requirement that a tender must be initiated within a specified timeframe (the discussion document seeks feedback on what an appropriate timeframe would be).

32 In addition, I am canvassing a proposal that would allow for tender candidates be offered a concession directly, should their tender application succeed. Current legislation only allows the Minister of Conservation to tender the opportunity to apply for a concession, not grant the successful candidate a concession outright.

Providing clarity on statutory requirements

33 I am proposing to provide a statutory timeframe in which reconsideration requests may be sought on concession applications. This would clarify the statutory requirements for applicants and enable more effective administration.

Other technical amendments to conservation management legislation

34 Due to the age and complexity of conservation legislation, some provisions are hindered by minor and technical errors, inconsistencies and/or outdated references. Correcting or updating these provisions will make the legislation more usable.

35 I am proposing to make the following minor and technical amendments:

35.1 Removing the personal liability of New Zealand Conservation Authority members and Conservation Board members acting in good faith when undertaking their statutory duties

35.2 Require the financial statements of reserve boards and reserve administering bodies only be audited when their annual revenue or expenditure is over the threshold of \$1 million

35.3 Removing the requirement that all powers delegated to Director-General under the Public Service Act 2020 be authorised in writing by the Public Service Commission

- 35.4 Allowing for a specific job title or position to be designated the role of Commissioner under the Reserves Act 1977
- 35.5 Streamlining the process for the creation of nature reserves and scientific reserves under the Reserves Act 1977
- 35.6 Allow for electronic options for public notification alongside notification through newspapers under the Reserves Act 1977
- 35.7 Clarifying that a concession is required for aircraft to land on all types of public conservation land
- 35.8 Clarifying that a concession is required for both recreational and commercial aircraft to land on public conservation land
- 35.9 Clarifying the definition of a conservation management plan by explicitly including plans created under the National Parks Act 1980.
- 35.10 Providing the New Zealand Police the ability to retain items seized under the Wild Animal Control Act 1977
- 35.11 Updating the definition of 'disability assist dog'
- 35.12 Updating references to Westland National Park/Tai Poutini National Park in the National Parks Act 1980.

Next steps

- 36 Subject to Cabinet approval of this paper, I will instruct DOC to commence public consultation and release the attached public discussion document. I propose an eight-week consultation period (coordinated with initial engagement on the review of the Wildlife Act 1953) with appropriately tailored approaches for three separate groups:
 - 36.1 Tangata whenua – virtual hui / regional hui at place as required. Direct communication with Post Settlement Governance Entities.
 - 36.2 Key stakeholders –virtual meetings and direct communication.
 - 36.3 The wider public – publication of the discussion document on the DOC website alongside an invitation to provide feedback on the proposals.
- 37 I also propose that DOC and the Parliamentary Counsel Office begin preparatory work on drafting instructions for the more minor and technical amendments and those which were previously consulted on to ensure the timeframes for drafting and introduction of the Bill can be met.
- 38 Following analysis of the feedback received during consultation, I propose to report back to Cabinet with recommended amendments.

Financial Implications

- 39 There are no immediate financial implications as a result of this paper. There may be financial implications resulting from amendments proposed in the discussion document.
- 40 The proposal to exempt specific activities requiring a concession would remove DOC's ability to recover the costs of regulating those activities through processing fees. DOC's ability to recover costs for processing applications where required would not be limited by the proposed change. The rationale for this is set out in the Stage 1 Cost Recovery Impact Statement to be attached to the public discussion document.
- 41 There may be some cost savings for Audit New Zealand if they are no longer required to audit reserve bodies and reserve administering bodies below the threshold.

Legislative Implications

- 42 There are no direct legislative implications resulting from the proposals in this paper. I will report back to Cabinet with proposed amendments to the legislation listed in this paper following public consultation.
- 43 The proposed Amendment Bill is currently on the legislative programme as Category 4 (refer to Select Committee within the year). I am looking to introduce an Amendment Bill in late 2022, with legislation passed in mid-2023.

44 s9(2)(f)(iv)

Impact Analysis

Regulatory Impact Assessment

- 45 The discussion document substitutes for a Regulatory Impact Assessment. Representatives from the Department of Conservation have reviewed the discussion document "Conservation Management and Processes" and confirm that it is likely to lead to effective consultation and support the delivery of Regulatory Impact Analysis to support subsequent decisions.

Climate Implications of Policy Assessment

- 46 The Climate Implications of Policy Assessment (CIPA) team has been consulted and confirms that the CIPA requirements do not apply to this proposal as the threshold for significance is not met.

Population Implications

- 47 There are no immediate population implications from this paper. The options canvassed in the paper would have implications for specific groups.

- 48 Proposals to allow DOC to return concession applications to run a competitive process would also better enable the economic aspirations of tangata whenua to be considered in allocating opportunities.
- 49 Changes to management planning and concessions processes would need to allow for existing requirements under Treaty settlement legislation. Where Treaty settlements are currently being negotiated, the proposed changes will need to be effectively communicated for the purpose of informed decision making. The same applies to obligations in concessions processes under the Marine and Coastal Area (Takutai Moana) Act 2011.
- 50 Concessionaires would benefit from amendments that result in more user friendly and transparent concessions and management planning processes. Examples include tourism businesses, farmers, beekeepers, and researchers.

Human Rights

- 51 The proposals in this paper are not inconsistent with the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993.

Consultation

- 52 The Treasury, the Ministry for the Environment, the Ministry of Justice, the Ministry for Foreign Affairs and Trade, Te Arawhiti, the Ministry for Primary Industries, the Department of Internal Affairs, the Ministry of Culture and Heritage, the Ministry for Business, Innovation and Employment, Te Puni Kōkiri, Land Information New Zealand, the Office of the Auditor General, the Ministry of Housing and Urban Development, and the Ministry of Transport were consulted on this Cabinet paper. The Department of the Prime Minister and Cabinet has been informed.

Communications

- 53 I propose to instruct DOC to publish the public discussion document on their website. I will publicly announce its release and publicise the key information via a press release. DOC will also publicise its release on its social media platforms and other key communications channels. DOC will directly communicate with tangata whenua and with key stakeholders informing them of consultation and requesting their participation.

Proactive Release

- 54 I intend to proactively release this Cabinet paper within 30 days of Cabinet making a final decision.

Recommendations

The Minister of Conservation recommends that the Committee:

- 1 **note** that in October 2021 Cabinet agreed to progress targeted amendments to conservation management planning and concessions legislation [CAB-21-MIN-0402 refers]
- 2 **note** that a Conservation (Management and Processes) Amendment Bill is expected to be introduced in late-2022, with legislation passed in mid-2023
- 3 **note** that the Minister of Conservation intends to initiate public consultation and release a discussion document to support legislative change to improve processes for conservation management planning and concessions management, including:
 - 3.1 Changes to improve the process for developing and reviewing conservation management planning documents
 - 3.2 Changes to improve efficiency and enable more proactive approaches to concessions management
 - 3.3 Minor and technical changes for the purposes of regulatory stewardship
- 4 **approve** public consultation and the release of the discussion document (subject to finalisation by the Minister of Conservation) to support improving conservation management processes;
- 5 **note** that the Minister of Conservation will report back to Cabinet with recommended amendments to legislation following public consultation.

Authorised for lodgement

Hon Kiri Allan

Minister of Conservation

Appendices

Appendix 1: Draft discussion document – Conservation Management and Processes

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Appendix 2: Summary of proposals

Management Planning amendments

<i>Issue 1A: The ten-yearly review cycle limits plans taking a long-term perspective</i>	
<p>Option 1: Remove the requirement that planning documents are reviewed in full every ten years. Replace with a statutory check-in process at ten years to assess if a full, partial, or no review is needed</p>	<p>Rationale:</p> <ul style="list-style-type: none"> • Reduces the requirement for lengthy and resource-intensive full reviews to occur so frequently. This will free up resource to undertake more regular partial reviews, helping to keep documents up-to-date in between full reviews. • The ten-year statutory check-in provides a safeguard to ensure regular assessment of the efficacy of documents in achieving their purpose. • Some Treaty settlement legislation has requirements related to the existing 10-year review requirement. Any changes need to allow for those requirements. The 10-year statutory check-in provides an avenue for relevant requirements to be assessed and provided for.
<p>AND/OR - Option 2: Extend the timeframe for full review of planning documents to twenty years</p>	<p>Rationale:</p> <ul style="list-style-type: none"> • Extending the existing timeframe provides more time for full reviews to occur. This will reduce pressure on the system by reducing the requirement for lengthy and resource-intensive full reviews to occur so frequently. • This will free up resource to undertake more regular partial reviews, helping to keep documents up-to-date in between full reviews.
<i>Issue 1B: DOC cannot easily respond to emerging issues, leaving planning documents out of date</i>	
<p>Proposal: Introduce a new streamlined process for partially reviewing planning documents</p>	<p>Rationale:</p> <ul style="list-style-type: none"> • Partial reviews have the same process requirements as full reviews, making them prohibitively resource intensive if the issues are small scale or of limited public interest. • Enable a pathway to address small-scale or low public interest issues that contribute to plans becoming out-of-date, providing improved statutory guidance to DOC. • A streamlined process would remove the process steps for public notification, public submissions, and hearings for small-scale or low public interest changes to planning documents. • Enable more frequent partial reviews.

Issue 1C: The current legislative process for public engagement in reviewing planning documents is outdated and inflexible	
<p>Option 1: Modernise and simplify the requirements for public notification and public engagement on a notified draft planning document</p>	<ul style="list-style-type: none"> Remove barriers that make it challenging for DOC to run high quality public engagement that is tailored to issues and community needs Enable a flexible, less costly, more user-friendly engagement process for DOC and the public Would remove prescriptive requirements around providing written submissions, holdings hearings, timeframes. Would enable planning documents to be shared electronically
<p>OR - Option 1a: same as Option 1, but retain the specific requirement for public hearings</p>	<ul style="list-style-type: none"> As above but retain the specific requirement that a hearings process forms part of the public engagement process. Requirements for hearings would be modified to ensure that the hearings process adds value
<p>AND/OR - Option 2: Remove the requirement to publicly notify the intent to prepare or review a national park management plan</p>	<ul style="list-style-type: none"> Makes the process more consistent with the process for developing conservation management strategies and plans. Removes an unnecessary process step Simplifies process for engagement in the drafting of national park management plans.
<p>AND/OR - Option 3: Enable electronic public notification and access to approved planning documents</p>	<ul style="list-style-type: none"> Current requirements for notifying planning documents and making them publicly available do not enable online publication. This means that hard copies must be available at specified times and places. This is outdated, inefficient and limits accessibility of documents.

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Concessions process amendments

<i>Issue 2A: Individual applications are required for all activities</i>	
<p>Option 1: Provide the Minister the power to authorise an activity through regulations (via. Order in Council)</p> <p><i>Discussion document states this as the preferred option</i></p>	<p>Rationale:</p> <ul style="list-style-type: none"> • Would enable DOC to assess what activities are acceptable in advance, and no longer require individual assessments • Would enable more efficient management of straightforward low-impact concession activities, reducing pressure on the system and allowing resources to focus on more substantive and complex issues • Makes rules around where users can and cannot conduct an activity clear to users • Makes conditions on an activity clear for users, removing back and forward dialogue with DOC
<p>OR - Option 2: Provide that planning documents can generally authorise an activity, removing the need for an individual concession for the activity in that area</p>	<p>Rationale:</p> <ul style="list-style-type: none"> • Enables the same power as above but makes use of the management planning system for the process of establishing generally authorised activities
<i>Issue 2B: DOC cannot make a concession for pre-approved activities available on demand</i>	
<p>Proposal: Clarify that DOC can assess the impacts of an activity in advance and put in place an automated process to grant some low-risk concessions online</p>	<p>Rationale:</p> <ul style="list-style-type: none"> • DOC Legal have provided advice that a decision-maker is legally required to assess relevant information for all individual concession applications, preventing this process from being automated. • Being able to automate some concessions decisions would free up resource and remove processing times for applicants. • Compliance may improve as it becomes easier to 'do the right thing' and get a permit
<i>Issue 2C: Limits on when concessions can be tendered</i>	
<p>Option 1: Provide the Minister the ability to return an application if running a tender process would be more appropriate</p>	<p>Rationale:</p> <ul style="list-style-type: none"> • Enables a mechanism to address the 'first in, first served' issue where allocation of a concession opportunity may not go to the best concessionaire • Improve DOC's ability to give effect to the active protection Treaty principle

<p>Option 2: Same power to return as in Option 1, but a tender process must be initiated within 6 months</p>	<p>Rationale: As with above, plus a timeframe would provide certainty to applicants– especially the initial applicant who has had their application returned</p>
<p>Issue 2D: <i>The tender process does not allow a successful tender candidate to be outright offered a concession</i></p>	
<p>Proposal: Enable granting a successful tender candidate a concession</p>	<p>Rationale: Removes administrative burden and costs for DOC and applicant to prepare and assess a tender application and then subsequently prepare and assess a concession application if successful.</p>
<p>Issue 2E: <i>There is no statutory timeframe to seek a reconsideration on a concession decision</i></p>	
<p>Proposal: Provide statutory timeframe in which reconsiderations may be sought</p>	<p>Rationale: Brings clarity for applicants and decision-makers on the timing of reconsideration requests and brings statutory consistency with other Acts regarding reconsideration and appeals of Crown decisions.</p>

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Minor and technical amendments

<p>Issue 3A: New Zealand Conservation Authority (NZCA) members and Conservation Board members could be personally liable for their decisions when exercising their statutory powers in role</p>	<p>Proposal: Remove personal liability of NZCA and Conservation Board members acting in good faith when undertaking their statutory duties.</p>
<p>Issue 3B: All reserve boards and reserve administering bodies under the Reserves Act 1977 must be audited, regardless of annual revenue and expenditure</p>	<p>Proposal: Amend the Reserves Act 1977 and the Public Finance Act 1989 to require reserve boards and reserve administering bodies only be audited when their annual revenue and expenditure exceeds \$1 million dollars</p>
<p>Issue 3C: The Public Service Act 2020 introduced an unintended effect requiring written consent from the Public Service Commission in relation to the delegation of any power to the Director-General under the Public Service Act 2020, instead of only powers delegated from the Commissioner</p>	<p>Proposal: Amend the Conservation Act 1987 to require the Public Service Commission only give written consent for the Director-General to delegate powers to a DOC officer or employee where the specific delegated powers are authorised under Schedule 3 Clause 6 of the Public Service Act 2020</p>
<p>Issue 3D: The role of 'Commissioner' under the Reserves Act 1977 can only be delegated to a specified individual and their job title</p>	<p>Proposal: Update legislation to allow for role of 'Commissioner' to be delegated to a specific job title (regardless of which individual holds that title)</p>
<p>Issue 3E: The two-step process to establish a 'conservation area' as a nature reserve or scientific reserve is cumbersome</p>	<p>Proposal: Amend legislation to allow a 'conservation area' to be established as a nature reserve or scientific reserve without first needing to be established as a 'reserve'</p>
<p>Issue 3F: Reserves Act 1977 only allows public notification via newspapers</p>	<p>Proposal: Allow for electronic options for public notification alongside notification through newspapers under the Reserves Act 1977</p>
<p>Issue 3G: Conservation Act 1987 does not explicitly state that an aircraft concession is required for landing or taking off on all public conservation land, not just a 'conservation area'</p>	<p>Proposal: Update legislation to explicitly state aircraft concessions are required for landing or taking off on all public conservation land, not just 'conservation areas'</p>

<p>Issue 3H: Conservation Act 1987 does not explicitly state that an aircraft concession is required for recreational aircraft activities</p>	<p>Proposal: Update legislation to explicitly that all aircraft activities (whether recreational or not) require a concession for landing or taking off on public conservation land</p>
<p>Issue 3I: Conservation Act 1987 definition of 'conservation management plan' does not include management plans under the National Parks Act 1980</p>	<p>Proposal: Update legislation to explicitly state any management plan approved under the National Parks Act 1980 is a 'conservation management plan'</p>
<p>Issue 3J: New Zealand Police require DOC authorisation to retain item(s) seized under the Wild Animal Control Act 1977</p>	<p>Proposal: Update legislation to remove requirement that New Zealand Police must have DOC authorisation to hold seized item(s)</p>
<p>Issue 3K: Conservation Act 1987 definition of disability assist dogs outdated and impractical</p>	<p>Proposal: Update definition of 'disability assist dog' in legislation</p>
<p>Issue 3L: Update references to Westland / Tai Poutini National Park in National Parks Act</p>	<p>Proposal: Update the National Parks Act where references are made to Westland National Park/Tai Poutini National Park</p>

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