

Submission on the Conservation Amendment Bill

July 2026

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 48 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

Key points of our submission

- We support the objectives of the Conservation Amendment Bill (the Bill) to streamline national level policies, planning documents, and statutory timeframes.
- The criteria used in an allocation process for concessions needs to take account of situations where concessions are required for only a part of an operation e.g. access to the site.
- Land reclassification considerations must provide certainty that concessions or similar arrangements will continue regardless of reclassification or disposal of land.

We make the following submission in relation to the Conservation Amendment Bill.

National Conservation Policy Statement

We support the development of a single National Conservation Policy Statement (NCPS) together with Area Plans to recognise the economic opportunities that arise from the use and development of land and other natural resources and historic resources managed by the Department of Conservation (DOC). This will reduce complexity within the system by providing more clarity and certainty for concession applicants and support faster concession decision making.

Concessions

The statutory time frames proposed in Clause 14 will speed up consideration of concession applications. It is important however that there are mechanisms to ensure timeframes are achieved.

While we generally support the allocation process proposed in Clause 14 subpart 3, concessions are needed by quarrying companies so that associated activities not covered by an access arrangement can be undertaken. For example, a concession to build an access road to a quarry may be required for a quarrying operation on adjoining

private land. If that quarry operator were to be unsuccessful in obtaining a concession through an allocation process to build an access road to the quarry, the overall project could be jeopardised. The criteria used for determining the use of an allocation process should take such circumstances into account.

We support Section 14ZV, Variations to conditions imposed on concessions. Such variations will allow the concession holder to address consequences on the environment that were not anticipated during the application process quickly, rather than relying on a protracted process for the review of consent conditions.

Land exchanges and disposal

We agree that the loosening of existing constraints on exchanging and disposing of crown-owned conservation land supports more effective land management by allowing greater optimisation of the portfolio of land managed by DOC.

Currently extraction of aggregates on DOC land is essential for flood mitigation, river restoration, and the construction and maintenance of tracks, car parks and structures in national parks and on other DOC land.

Quarries successfully operate under concessions on numerous parcels of DOC land and therefore it is critical that the ongoing status of concessions is not disrupted if eligible areas of land are exchanged or disposed. Any reclassification considerations must provide certainty that concessions or similar arrangements will continue regardless of reclassification or disposal.

General comments

We agree that the processing of concession and access arrangement applications has been a lengthy and burdensome process which this Bill is trying to address. We have had examples in our sector of relatively simple five-year concessions taking three years to process, meaning most of the duration of the concession is taken up with applying for the next one.

The rules that govern the system need to be clear, consistent and able to be updated to reflect changes in how people interact with places and how those places can be protected. The rules should provide for faster and simpler approval of quarries and aggregate extraction activities on DOC land necessary for the delivery of aggregates (including sand) for DOCs own use and to supply nationally and regionally significant projects.

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