

Submission to the Environment Committee

On the Conservation Amendment Bill

Submitter	Spada (Screen Producers NZ)
Submission on	Conservation Amendment Bill
Date	30/06/2026
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Wish to be heard?	No

Note: contact details (email, phone, postal address) should be provided separately to the Committee and not included in the body of this submission, as submissions are published.

1. Introduction

1.1 Spada (Screen Producers NZ) welcomes the opportunity to submit on the Conservation Amendment Bill (the Bill). Spada is the industry association representing independent screen producers across film, television, and digital content in New Zealand. Spada's members regularly produce content that involves filming on public conservation land (PCL) administered by the Department of Conservation (DOC), and many rely on the concessions system to obtain authorisation to do so.

1.2 Spada's interest in the Bill is focused and practical. We do not take a position on the wider debates concerning land disposal, exchange provisions, or the balance between conservation and economic development that have featured in public commentary on the Bill. Our submission instead addresses the parts of the Bill most relevant to our members: the reform of the concessions system, and the framework for the new National Conservation Policy Statement (NCPS) under which filming activity will be classified and managed.

1.3 New Zealand's natural landscapes are a significant asset to the screen sector, supporting both domestic productions and international productions choosing to film here. A concessions system that is efficient, predictable, and proportionate directly affects the competitiveness and viability of screen production in New Zealand, particularly for smaller, independent productions that operate on tight budgets.

2. Overall position

2.1 Spada supports the general intent of the Bill to simplify and modernise the concessions framework. The current system of overlapping conservation management strategies, plans, and general policies is widely recognised as complex, inconsistent between regions, and slow to administer. A single National Conservation Policy Statement, supported by streamlined area plans, has the potential to give producers and location managers far greater certainty when planning a shoot on conservation land.

2.2 However, Spada's support is conditional on the detail of how filming is treated within the new framework — most importantly, whether and how filming activities are classified as

exempt, pre-approved, or standard concessions, and whether fee settings remain proportionate for small and independent productions. These details will largely be set through the NCPS rather than the Bill itself, and we have therefore submitted on the NCPS, as well as address this further in Section 5.

Summary position

Support in principle, subject to amendment: Spada supports the streamlining of the concessions system but seeks specific amendments to ensure filming fees and processing requirements remain proportionate to production scale and seeks assurance that screen sector interests will be reflected in the development of the National Conservation Policy Statement.

3. Loss of iconic filming locations

3.1 Beyond the concessions and NCPS issues addressed in this submission, Spada shares the concerns raised by conservation groups about the Bill's proposed loosening of the rules governing the exchange and disposal (sale) of public conservation land.

3.2 New Zealand's distinctive, often dramatic landscapes are a core part of the value proposition for the screen sector. They draw international productions to film here, and they are integral to the creative identity of domestic film and television. Locations that read on screen as remote, untouched, or iconic are precisely the kind of land this Bill would expose to a significantly weakened disposal and exchange test - moving away from the current requirement that disposed land have 'no or very low' conservation value, towards a lower bar focused on whether land is important for threatened species or among the best examples of its type.

3.3 If iconic or visually distinctive conservation land is sold into private ownership, the consequence for the screen sector is not temporary. Unlike a concession, which can be renewed, varied, or declined for a future production, the sale of land removes that location from the public conservation estate permanently. A landscape that has featured in New Zealand productions for decades, or that a producer is scouting for a future production, could become permanently inaccessible to the New Zealand film industry, regardless of how the concessions and NCPS settings discussed elsewhere in this submission are ultimately designed.

3.4 The financial value of public conservation land to New Zealand is not adequately captured by concession fees alone. The global audiences who watch screen stories featuring Aotearoa New Zealand's landscapes are themselves a significant driver of international tourism, separate from and additional to any revenue DOC collects directly from a production.

Recent survey data shows New Zealand's scenery is the leading factor drawing international tourists, with films such as *The Hobbit* and *The Lord of the Rings* cited as a key incentive to visit by more than 13 percent of international visitors surveyed, a return of many millions of dollars in the 20+ years these films have been finding audiences across the world. On-the-ground concession fees and visitor levies should be weighed against this much

larger, ongoing economic return — a return that depends on these landscapes remaining accessible for future productions to film, not on a one-off payment for a single shoot.

3.5 We note that the Minister of Conservation has signalled an intention to remove the disposal and exchange provisions from the Bill following public concern. Spada welcomes this signal but observes that the Bill before the Committee has not yet been amended to reflect it, and that the Committee, not the Minister, is responsible for recommending any such change through the select committee process. We urge the Committee to treat the removal, or at minimum substantial strengthening, of the disposal and exchange provisions as a priority recommendation arising from this round of submissions, rather than relying on assurances given outside the Bill's text.

Recommendation 1

That the Committee recommend removing, or substantially narrowing and strengthening the safeguards around, the Bill's proposed exchange and disposal provisions, so that iconic and visually distinctive conservation land cannot be permanently lost to the screen sector and the wider public through sale or exchange.

4. Concessions reform — proportionality for small productions

4.1 The problem with the current settings

4.1 Screen producers report that the cost of DOC filming concessions is disproportionate to the scale and impact of many independent productions. A small crew shooting a short documentary sequence, a low-budget drama, or a single establishing shot can face fee structures and administrative requirements similar to those applied to large commercial productions with substantially greater crew numbers, equipment footprint, and potential impact on the land.

4.2 This disproportionality creates a barrier to New Zealand stories being told on New Zealand landscapes. Independent producers without the budget of a major international studio production may avoid conservation land altogether or absorb costs that put pressure on already tight production budgets, simply because the concession fee does not scale with the actual footprint or impact of the activity.

4.2 What the Bill could do

4.3 The Bill's introduction of exempt activities, pre-approved concessions, and a more standardised national approach is a welcome opportunity to address this. Spada recommends that the Committee ensure the legislative framework supports fee structures and concession tiers that scale with the actual scale and impact of an activity (for example, by crew size, equipment, duration, and location sensitivity) rather than applying a flat or activity-type-based fee regardless of scale.

4.4 Spada also recommends that low-impact filming activities - such as small crews using non-intrusive equipment, for short durations, in areas where public access is not restricted - be considered for inclusion among the exempt or pre-approved activity categories the Bill

enables, consistent with the treatment proposed for similar low-impact activities such as observational research.

Recommendation 2

Spada recommends that filming concession fees under the new framework be scaled to the size and impact of each production (including crew size, equipment, duration and location sensitivity), with proportionate settings for small and independent productions. The framework should explicitly recognise that domestic New Zealand productions typically operate on substantially smaller budgets than international productions and should not be assessed against the same fee benchmarks.

Fee levels should also reflect the broader tourism, cultural and economic value generated by showcasing New Zealand's conservation land, rather than being determined solely by on-the-ground revenue.

Recommendation 3

Provide that low-impact filming activities (small crew, minimal equipment, short duration, public access areas) be classified as exempt or pre-approved activities under the National Conservation Policy Statement, consistent with the treatment proposed for other low-impact activities.

5. The National Conservation Policy Statement

5.1 Spada notes that the detailed classification of filming as exempt, pre-approved, or requiring standard concession assessment will be determined through the first National Conservation Policy Statement (NCPS), which is the subject of a separate consultation currently being run by DOC, open until 10 August 2026, rather than through the Bill itself.

5.2 This means the outcomes that matter most to Spada members and the wider domestic screen industry - the practical rules and fee settings that will apply to screen production on conservation land - will not be settled through this select committee process. Spada is also submitting detailed feedback on DOC's NCPS consultation, addressing fee structures, processing timeframes, and classification of filming activities in full.

5.3 Spada raises this issue with the Committee so that the connection between the Bill and the NCPS consultation is on the record, and to seek assurance that the screen sector — as an established, economically significant user of conservation land under the current concessions system — will be recognised as a relevant stakeholder in the development of the NCPS, alongside the tourism, recreation, and research interests more commonly referenced in public discussion of the Bill.

Recommendation 4

That the Committee note the screen production sector as an existing and economically significant concession-holder group and recommend that DOC ensure screen sector

representatives are engaged in developing the content of the first National Conservation Policy Statement.

6. Processing efficiency and certainty

6.1 Production scheduling is typically fixed well in advance and dependent on weather, cast and crew availability, and funding windows. Delays or unpredictability in concession processing can jeopardise an entire shoot. Spada supports the Bill's stated aim of enabling faster, more predictable concession decisions through a single national policy statement, and encourages the Committee to ensure statutory timeframes for processing standard applications are retained or strengthened through the legislative process, not left solely to administrative practice.

6.2 Spada also supports the Bill's intent to reduce inconsistency between regions and conservation land types. Producers currently report that the same type of filming activity can be treated differently depending on which DOC office or conservation board area is involved. A single NCPS, consistently applied, should reduce this inconsistency, provided implementation guidance for staff is developed alongside it.

Summary position

Support in principle, seeking specific changes: Spada supports the exempt/pre-approved framework and increased consistency across regions, but seeks a broader, scaled approach to filming that does not limit its practical benefit to news media and short-form commercial shoots, leaving most independent productions to rely on the slower standard application process the NCPS is designed to relieve.

7. Conclusion

7.1 While Spada supports the overarching goal of simplifying and modernising the conservation concessions system, that support is conditional on two things:

- (a) that the disposal and exchange provisions discussed in Section 3 are removed or substantially strengthened so that iconic filming locations are not permanently lost; and
- (b) that the detail of implementation — particularly fee proportionality for small and independent productions — is addressed, whether through amendments to the Bill or through clear direction to the forthcoming National Conservation Policy Statement.

7.2 Spada thanks the Committee for the opportunity to submit and would welcome the opportunity to speak to this submission if required.

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