

Submission to the Department of Conservation

On the Proposed Content of the First National Conservation Policy Statement

Submitter	Spada (Screen Producers NZ)
Submission on	Content of the first National Conservation Policy Statement (NCPS)
Date	30/06/2026
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Note: this submission responds to the Department of Conservation's consultation on the proposed content of the first National Conservation Policy Statement (NCPS), which is separate from the Conservation Amendment Bill select committee process. Spada has made a separate submission to the Environment Committee on the Bill itself.

1. Introduction

1.1 Spada (Screen Producers NZ) welcomes the opportunity to submit on the Department of Conservation's (DOC) proposal document setting out the content of the first National Conservation Policy Statement (NCPS). Spada is the industry association representing independent screen producers across film, television, and digital content in New Zealand.

1.2 The Bill sets out the legal mechanism for exempt activities, pre-approved activities, and standardised pre-assessment; whereas the NCPS is where the Government has decided **how** those mechanisms will actually apply to filming – which has a direct impact on the sector and on Spada members.

This submission therefore focuses specifically on the policies, criteria, and conditions proposed for filming and photography in the NCPS proposal document, and is filed separately from Spada's submission to the Environment Committee on the Bill.

1.3 We have structured this submission around the relevant proposed policies, and the consultation questions DOC has posed, so that our feedback can be directly incorporated into the final NCPS.

2. Overall position

2.1 Spada supports the principle of exempt and pre-approved activities and welcomes DOC's effort to bring more certainty and consistency to a concessions system that has, for years, been slow and inconsistently applied to filming applications.

2.2 However, the current proposal treats filming and photography narrowly and, in places, in a way that does not reflect how independent New Zealand productions actually operate. Our principal concerns are that the proposed exemption for filming is restricted to news media

and excludes nearly all of Spada's membership, and that the proposed pre-approved filming category, while a welcome step, imposes duration, group size, and location conditions that will exclude many independent documentary, drama, and factual productions from its benefit.

Summary position

Support in principle, seeking specific changes: Spada supports the exempt/pre-approved framework 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.

3. Exempt activities — filming and photography (Policies 21–22)

3.1 Proposal: the NCPS proposes exempting four activities from requiring a concession, including 'news of the day filming or photography', subject to conditions including that the activity is undertaken by a news media organisation that is a member of the New Zealand Media Council, uses standard media tools excluding drones, and involves no temporary or permanent structures.

3.2 As drafted, this exemption is too narrow. It does not extend to documentary, factual, drama, or commercial screen productions, which make up the great majority of screen practitioners. A small independent crew capturing a single establishing shot or a short observational sequence for a documentary faces the same concession requirement as a large commercial production, even though the activity may be no more intensive than the news filming the NCPS proposes to exempt outright.

3.3 We accept that a documentary or drama shoot is a different activity to news gathering, however, we recommend that the exemption criteria be re-examined so that genuinely low-impact screen production activity — a small crew, standard equipment, short duration, no structures, on already-public tracks or areas — can be included in the exempted activities.

Recommendation 1

That DOC consider extending the proposed filming exemption (or creating a comparable exemption) to cover low-impact, small-crew, short-duration documentary, factual, and educational filming, using equivalent conditions to those proposed for news of the day filming (standard equipment, no drones, no structures), rather than restricting the exemption to news media organisations.

4. Pre-approved activities — commercial filming and photography (Policy 23–24, Appendix 3)

4.1 What is proposed

4.1 The NCPS proposes pre-approving 'small to medium scale commercial filming or photography on formed tracks or in established visitor areas'. Under this proposal, a

concession would be pre-approved provided filming takes place on existing tracks or in established visitor areas, all on-site filming is completed within 7 consecutive days (small scale) or 21 consecutive days (medium scale), and crew and talent combined do not exceed 15 people in a High or Medium Visitor Zone (30 for medium scale in a High Visitor Zone) or 8 people in a Low Visitor Zone.

DOC's own assessment indicates this pre-approved category would apply across approximately 94.4% of public conservation land by area, which Spada considers a genuinely useful starting point.

4.2 Where the proposed settings fall short

4.2 Many 'typical' productions would not fit within these settings, for reasons that have little to do with the actual impact of the activity on conservation values:

- Duration: feature films, high-end television drama, and longer-form documentary productions routinely require location access spread across more than 21 consecutive days, often with gaps between shoot days for weather, scheduling, or post-production needs between sequences. A strict consecutive-day window does not reflect how many productions are actually scheduled.
- Crew size: drama and high-end television productions, even modest-budget New Zealand productions, frequently exceed 15 or 30 people once camera, sound, art department, safety, and production crew are included alongside on-screen talent. A 15-person cap in a Medium Visitor Zone, in particular, will exclude most professional drama shoots.
- Off-track and off-site activity: 'formed tracks or established visitor areas' excludes many of the remote, untouched-looking locations that make conservation land valuable to productions in the first place. A location chosen precisely because it looks unspoiled by infrastructure is, by definition, less likely to be on a formed track.
- Drones: drone use is excluded from the filming pre-approval and requires a separate concession even for an otherwise-qualifying small or medium shoot, adding a parallel approval process for what is now a standard part of most professional productions' camera package.

4.3 The practical effect is that the majority of productions carried out by our independent New Zealand producers working to professional standards but without major studio budgets are likely to fall outside the pre-approved category. But for all of the simplest shoots they will default back into the standard application process – the very process the NCPS is intended to relieve pressure from.

Recommendation 2

DOC reconsider the consecutive-day requirement for pre-approved filming to allow non-consecutive shoot days within a longer total window (for example, a defined number of filming days within a 60 or 90-day period), reflecting how drama and documentary productions are typically scheduled.

Recommendation 3

DOC review the proposed crew/talent caps for pre-approved filming, particularly in Medium and Low Visitor Zones, against the realistic crew composition of professional New Zealand drama and documentary productions, with a view to increasing the caps or introducing an additional tier for productions that exceed them but remain modest in scale and impact.

Recommendation 4

DOC consider a pathway for pre-approval (or standardised pre-assessment, see Section 5) of off-track filming in defined circumstances — for example, small crews on foot, no vehicles, no structures — rather than confining the pre-approved filming category entirely to formed tracks and established visitor areas.

Recommendation 5

DOC consider including limited, low-impact drone use (for example, a single drone, line-of-sight operation, away from wildlife, consistent with the conditions already proposed for the separate drone pre-approval) within the pre-approved filming category itself, rather than requiring a wholly separate concession process for productions that otherwise qualify for pre-approval.

5. Standardised pre-assessment and visitor zones (Policy 26, Appendix 4)

5.1 The NCPS proposes a list of 26 ‘economically significant activities’ that would receive standardised pre-assessment against land classification and visitor zones, intended to give applicants more transparency about where an activity is likely to be approved even though a standard application is still required.

5.2 It is unclear in the consultation document whether larger-scale film and television production (productions exceeding the pre-approved filming thresholds discussed in Section 4) is included among the 26 activities proposed for standardised pre-assessment.

With the proposed settings, larger productions will fall outside pre-approval entirely and into the standard process – again - the very process this reform is meant to make faster and more predictable.

If larger-scale filming was included within the standardised pre-assessment list it would not remove DOC's case-by-case discretion - but it would give producers earlier visibility into whether a location and production scale is likely to be supported, which is incredibly important when you're working on productions that are time-sensitive both from a scheduling and financing perspective.

Recommendation 6

DOC clarify whether larger-scale film and television productions are included among the 26 activities proposed for standardised pre-assessment.

If not, Spada recommends adding them to the list so that productions falling outside the pre-approved filming thresholds still receive earlier guidance on likely consistency with visitor zones and land classification.

6. Fees and proportionality

6.1 The consultation document does not set out proposed fee levels, which Spada understands will be addressed separately. We raise the issue here because it is central to whether the reformed system genuinely benefits domestic screen productions.

6.2 Screen producers report that current concession fees and administrative requirements are disproportionate to the scale and impact of many independent productions. A small crew shooting a short sequence can face costs and processes similar to those applied to a large commercial production with a substantially greater footprint.

Spada proposes that, as fee settings for pre-approved and standard filming concessions are developed, DOC ensures they scale with the actual impact of the activity - crew size, equipment, duration, and location sensitivity - rather than being set as a flat rate by activity type.

6.3 This is particularly important given the gap between domestic and international production budgets. International productions filming in New Zealand frequently operate with substantially larger budgets than domestic productions telling New Zealand stories and can absorb a flat concession fee far more easily. A fee set with a major international production in mind, even one framed as moderate or reasonable in that context, can be a significant and sometimes prohibitive cost for a domestically funded documentary, drama, or factual production. If fee settings do not distinguish between these two markedly different cost bases, the practical effect will be to price domestic productions out of conservation land while leaving access largely unaffected for better-funded international productions - the opposite of what a proportionate, scaled fee structure should achieve.

6.4 More broadly, Spada urges DOC to consider that the financial benefit of conservation land and locations to New Zealand cannot be measured by on-the-ground concession fees alone. The global audiences who watch screen stories featuring Aotearoa New Zealand's scenery are themselves a major and ongoing driver of international tourism, separate from and considerably larger than any fee revenue collected 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 tourist dollars spent in the 20+ years since the films released. A fee-setting approach that treats the concession fee as the primary or sole return to New Zealand from screen production risks undervaluing this much larger downstream benefit, which depends on conservation land remaining accessible and affordable for future productions to film, not on maximising revenue from any single shoot.

Recommendation 7

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.

7. Areas of disapplication

7.1 Spada does not have site-specific information to offer in response to this question and defers to conservation groups, iwi, and local DOC offices with direct knowledge of sensitive sites.

8. Conclusion

8.1 Spada supports the direction of the NCPS reforms and the goal of a simpler, faster, more consistent concessions system.

8.2 Spada supports the proposed exempt and pre-approved activity categories and sees this approach as a genuine opportunity to reduce the cost and delay currently experienced when filming on public conservation land.

8.3 As outlined in our recommendations, Spada's key concern is that the proposed reforms benefit only a narrow segment of screen production - news media through the exemption, and short, small-crew shoots through the pre-approval pathway - while leaving the majority of independent New Zealand drama, documentary and factual productions subject to the existing standard concessions process. This significantly limits the effectiveness of the reforms and undermines their objective of streamlining access to conservation

8.4 Spada thanks the Department for the opportunity to submit on this important consultation, and would welcome the opportunity to discuss them further with the Department if required.

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