

Conservation House
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Wellington, 6011
doc.govt.nz

Ref: OIAD-6201

22 April 2026

Tēnā koe [REDACTED]

Thank you for your request to the Department of Conservation, received on 23 March 2026, in which you asked for:

1. *Any internal guidelines, policies, manuals, or standard operating procedures used by the Department of Conservation when assessing concession applications, including ecological or environmental assessments.*
2. *The criteria, benchmarks, or standards used to determine whether information is considered “sufficient” or “adequate” for the purposes of Section 17U(2)(a) of the Conservation Act 1987.*
3. *Any guidance documents or methodologies used for site assessments, including:*
 - a. *Ecological survey methods*
 - b. *Biomass or vegetation assessment methods*
 - c. *Assessment of fuel load and fire risk*
 - d. *Evaluation of wilding conifer presence or risk*
4. *Any documents outlining how adverse and beneficial effects are identified, measured, and weighed in concession assessments.*
5. *Any templates, checklists, or assessment frameworks used by DOC staff or contractors when undertaking or reviewing site assessments.*
6. *Any guidance provided to DOC staff or contractors regarding the use of external research, including national or international studies, in informing assessments.*
7. *Any information that outlines how uncertainty or inconclusive survey results are treated within the decision-making process.*

We are seeking this information to better understand the framework within which concession applications are assessed, and to ensure that any information we provide aligns with DOC’s requirements.”

We have considered your request under the Official Information Act 1982.

Your questions and our responses are listed below:

1. *Any internal guidelines, policies, manuals, or standard operating procedures used by the Department of Conservation when assessing concession applications, including ecological or environmental assessments.*

We have interpreted part one of your request as including all guidance (including templates, policies, and procedure guidelines) for the processing of concessions held by DOC.

Applications DOC receives for concession activity on public conservation land can vary greatly in scale, environmental impact, and ecological land value. As such, DOC has a Regulatory Operating Manual page on its intranet which contains many webpages of guidance for staff to review in relation to DOC’s permissions system. Additionally, searches of DOC’s central database show a large amount of additional documentation which may be utilised during assessment of individual concession applications depending on the activity applied for.

I regret that I am not able to provide you with the entirety of the information you seek without substantial collation and research and so must refuse part one of your request under section 18(f) of the OIA. I have borne in mind section 18B of the Official Information Act but concluded that use of this provision would not assist in this case.

However, the guidance mentioned above stems from the following primary legislation and policies which inform all concession application assessments:

Item	Document	Link
1	Conservation Act 1987 New Zealand Legislation	www.legislation.govt.nz/act/public/1987/65/en/latest/
2	Statutory Planning Documents	www.doc.govt.nz/about-us/our-policies-and-plans/statutory-plans/
3	National Policy Statement for Indigenous Biodiversity 2023 Ministry for the Environment*	https://environment.govt.nz/publications/national-policy-statement-for-indigenous-biodiversity-2/
4	Conservation General Policy	https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/conservation-general-policy.pdf
5	Department of Conservation guidelines for assessing significant ecological values	www.doc.govt.nz/documents/science-and-technical/sfc327entire.pdf

***Please note:** This document is not currently considered by technical advisors during ecological assessments but was used as guidance for assessment criteria by DOC in recent history and is included for completeness.

2. The criteria, benchmarks, or standards used to determine whether information is considered “sufficient” or “adequate” for the purposes of Section 17U(2)(a) of the Conservation Act 1987.

As you will be aware, Section 17U(2)(a) of the Conservation Act 1987 provides for the Minister to decline any application if he or she considers there is insufficient or inadequate information for him or her to assess the effects of it (including the effects of any proposed methods to avoid, remedy, or mitigate the adverse effects).

As mentioned above, applications DOC receives for concession activity on public conservation land can vary greatly in scale, environmental impact, and ecological land value. As such every application must be considered on a case-by-case basis, taking into account the policies referenced earlier.

For example, in relation to your current concession application [123086-GRA refers], I understand you were advised on 5 March 2026 a site visit would be required for DOC to sufficiently assess the proposed activity and its potential effects. I understand you were also advised that without this site assessment, your application was likely to be declined under Section 17U(2)(a) of the Conservation Act 1987.

As further advised to you on 13 March 2026, the site assessment is needed to assess the indigenous vegetation, and ecosystems present on site, their vulnerability, and their current condition as previous site assessment information held regarding this site is considerably out of date.

Through this assessment, DOC would be able to accurately consider any added pressure the increased level of grazing proposed in your application could have on these ecological values. Other environmental drivers, such as weeds, drought, and the impact of wild animals with and without additional grazing pressure, would also be able to be considered.

3. *Any guidance documents or methodologies used for site assessments, including:*
 - a. *Ecological survey methods*
 - b. *Biomass or vegetation assessment methods*
 - c. *Assessment of fuel load and fire risk*
 - d. *Evaluation of wilding conifer presence or risk*

As advised above, DOC undertakes each site assessment on a case-by-case basis, ensuring the appropriate ecological advice is obtained for the specific area and activity being applied for.

As previously advised, including on 13 March 2026, DOC needs to assess ecological significance and any potential adverse effects of a proposed activity at a specific site. This is done by applying the NPSIB criteria, as reflected in DOC's guidelines and referenced above in response to part one of your request as items 3 and 5.

4. *Any documents outlining how adverse and beneficial effects are identified, measured, and weighed in concession assessments.*

Guidance used by DOC staff in the processing of concession applications, and in particular site assessments for the consideration of significant ecological values within concession applications, is linked above as item 5 (see response to part one of your request).

Please be advised that adverse and beneficial ecological effects of the activity applied for within a concession application form only a part of the assessment a Minister must consider under Part 3B of the Conservation Act 1987.

For your convenience, I note that criteria applied when considering grazing concessions specifically, such as your concession application 123086-GRA, can be found in the above item 4, on page 43. Site assessment criteria for assessing significant ecological values can also be found within item 5 of the above table, on page 18.

5. *Any templates, checklists, or assessment frameworks used by DOC staff or contractors when undertaking or reviewing site assessments.*
6. *Any guidance provided to DOC staff or contractors regarding the use of external research, including national or international studies, in informing assessments.*
7. *Any information that outlines how uncertainty or inconclusive survey results are treated within the decision-making process.*

The framework for site assessment of ecological values and consideration of survey results is held within the above linked document '*Department of Conservation guidelines for assessing significant ecological values*' (item 5).

DOC does not hold any additional templates or checklist guidance for site assessments. This is because the case-by-case nature of site assessments means any checklist or template would be either overly prescriptive or too general to be of practical value. The same applies to any overarching guidance provided to DOC staff or contractors on the use of external research to inform assessments.

You are entitled to seek an investigation and review of my decision by writing to an Ombudsman as provided by section 28(3) of the Official Information Act.

Please note that this letter (with your personal details removed) may be published on the Department's website.

[REDACTED]

Nāku noa, nā



Anita Murrell
Principal Advisor Regulatory Authorisations
Department of Conservation
Te Papa Atawhai