Submitter information

The Ministry of Business, Innovation and Employment (MBIE) would appreciate if you would provide some information about yourself. If you choose to provide information in the "About you" section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

A. About you

Name: Privacy of natural

Email address: Privacy of natural persons

B. Are you happy for MBIE to contact you if we have questions about your submission?

☐ Yes ☒ No

C. Are you making this submission on behalf of a business or organisation?

☐ Yes ☐ **No**

If yes, please tell us the title of your company/organisation:

D. The best way to describe your role is:

☐ Academic/researcher
☒ Consultant (please specify below)
☐ Tradesperson (please specify below)
☐ Industry group (please specify below)
☐ Industry participant (please specify below)
☐ Independent expert (please specify below)
☐ Business owner (please specify below)
☐ Student (please specify below)
☐ Other (please specify below)
☐ Prefer not to say

Please specify here:

Environmental scientist

E. Privacy information

☒ The Privacy Act 2020 applies to submissions. Please check the box if you do not wish your name or other personal information to be included in any information about submissions that MBIE may publish.

☐ MBIE may upload submissions, or a summary of submissions, received to MBIE's website at www.mbie.govt.nz. If you do not want your submission or a summary of your submission to be placed on our website, please check the box and type an explanation below:

I do not want my submission placed on MBIE's website because… [insert reasoning here]

F. Confidential information

☐ I would like my submission (or identifiable parts of my submission) to be kept confidential and have stated my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

If you have checked this box, please tell us what parts of your submission are to be kept confidential.

A Minerals Strategy for New Zealand to 2040

MBIE is developing a *Minerals Strategy for New Zealand to 2040* to enable us to take a long-term, strategic approach to how we develop our mineral resources. This does not include petroleum which already has an advanced regulatory regime.

Minerals play an essential role in New Zealand's economic growth through high-paying jobs, Crown royalties, direct positive impact in the regions where mining takes place, and through export revenues. Minerals are also critical inputs into products that are necessary for other sectors to thrive, including the use of aggregates in construction and infrastructure.

Minerals will continue to play a major role in New Zealand's export-led economic growth and contribute to our economic functions, but the minerals sector faces some risks and challenges. These include lack of complete understanding about our minerals ecosystem, supply risks, social license, and a regulatory system that needs to be improved to enable investments.

These challenges require a long-term strategic approach to ensure that resource development for our economic prosperity happens in a responsible manner. Developing a minerals strategy is a fundamental first step in ensuring that we have a strategic framework for resource production.

The Minerals Strategy Discussion Document seeks feedback on the context and design of the strategy. It discusses key strategic issues, challenges and opportunities facing the minerals sector in New Zealand, and how we could address them.

The strategy is built on three key pillars, **Enhancing prosperity for New Zealanders**, **Demonstrating the sector's value**, and **Delivering minerals for a clean energy transition**, and identifies specific actions the Government could take to position the minerals sector to deliver value in an environmentally responsible manner.

Please see the Minerals Strategy Discussion Document for more information.

Questions for the consultation

1. Are the strategic pillars of the Draft Strategy (**Enhancing prosperity for New Zealanders**, **Demonstrating the sector's value**, and **Delivering minerals for a clean energy transition**) suitable or is there more we need to consider?

☐ Yes, they are suitable ☒ No, they are not suitable ☐ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice? Or is there more we need to consider?

The burying of the social & environmental impact within the pillar "Demonstrating the sector's value" prioritises economic value over major, wide-ranging risks of ramping up mining in NZ.

Evaluating the net social & environmental benefits of mining is fraught with subjective measures. How does one balance the cost of toxic tailings, polluted waterways, habitat loss, biodiversity loss, health & safety, and the social cost of locking in communities into dying industries like coal (plus the opportunity cost of not providing realistic options for a just transition away) with the benefits from the extraction? These are difficult things to quantify, and certainly not in dollar amounts. Without a clear evidence-based framework for how one would measure these costs

and benefits and weigh them up against each other, this pillar is toothless in its ability to mitigate the significant risks of mining.

I would suggest a strategic pillar that is specifically about managing risks. In particular, it should focus on evaluating risk to various stakeholders before taking on a project, giving it the same priority as assessing the economic value of a project. This would create a more balanced strategy, that at least mitigates the negative impacts.

The choice of minerals that we allow should be those that help us towards a zero carbon future. Coal is absolutely not one of these. New Zealand is in a lucky position to be able to go 100% renewable in the near future, if we choose it. Also, looking at the new minerals that are looking to be mined, while many of these may be important for the energy transition, this should not give them an automatic greenlight without careful due diligence that scientifically proves their necessity and value over the known negative impacts of mining.

2. Are the key actions the right ones to deliver on our strategic pillars, and are they ambitious enough?

☐ Yes, the actions are the right ones and are ambitious enough
☒ No, the actions are not the right ones and not ambitious enough
☐ Not sure/no preference

If **No**, what else might we need to consider?

Firstly, the answer options to this question are biased and leading. I do not think the actions are the right ones, but not because I don't think they are ambitious enough. I think the actions do not achieve the strategic pillars of enhancing the prosperity of NZers, or supporting a clean energy transition.

I am strongly opposed to the Fast-track Approvals Bill. This sells out NZ's precious natural resources to large overseas corporations. The undemocratic, absolute control that this bill gives to 3 MPs makes us vulnerable to corruption, in this current government but also for future governments to come. The Fast-track Approvals Bill is in no way necessary for a safe, productive, high-value minerals sector.

I am strongly opposed to the continuation or expansion of coal mining for climate reasons. There is no world in which new coal mines support a clean energy transition. This is backed by an overwhelming scientific consensus.

I do not support seabed mining within NZ territorial waters or beyond. Since 2022, the NZ government has supported the moratorium on deep sea mining in areas beyond national jurisdiction, recognising the need for adequate knowledge and understanding of the impacts involved. https://www.beehive.govt.nz/release/nz-backs-conditional-moratorium-seabed-mining-international-waters

Off the Taranaki coast, hapū and iwi are strongly against seabed mining. A government that honours Te Tiriti would respect the views of these custodians. Seabed mining threatens the ability of the marine environments to provide kaimoana and support fisheries.

The ocean is also our world's largest carbon sink, absorbing 25 percent of all carbon dioxide emissions and absoring 90 percent of the excess heat generated by these emissions. However, due to marine biodiversity loss from plastic pollution, warming waters, ocean acidification (due to excess CO2 absorption), shipping, and cruise ships, the ocean is losing its ability to do most of the work of climate action for us. Seabed mining, which we know will massively damage the marine ecosystems, will further devastate the ocean's ability to sequester carbon, with extremely negative impacts on global warming. New Zealand must become the solution to restoring ocean health, not the problem.

3. Are there opportunities for our minerals sector we haven't considered?

☒ Yes, there are ☐ No, there are none ☐ Not sure/no preference

If **Yes**, what are the opportunities for our minerals sectors we should consider?

Committing to no new mines, and having strong frameworks for assessing the new minerals we extract based on how they provide value to the modern decarbonised world economy. We could sell this knowledge and be a global leader in conscious mining, recycling of metals, and just transition from coal mining to a clean energy future.

4. Are there challenges for our minerals sector we haven't considered?

☒ Yes, there are other challenges not considered
☐ No, all challenges have been considered
☐ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

Environmental, human health, legal challenges, land ownership challenges.

5. Are there any other things we have missed that we should include, or things we should not include?

These things could be economic/financial, environmental, health and safety related, or other areas.

We should not be locking our economy into being reliant on mining, and especially not fossil fuel expansion in the form of new coal mines. There are always other options for decentralised regional income through high-value economies such as value-added products and IT. While some minerals will be necessary for the renewables transition, these are far more niche than the proposed strategy suggests.

Many minerals are very harmful to human health, posing an unnecessary risk to our population. For example, Antimony is harmful to the eyes and skin, and can also cause problems with the lungs, heart and stomach. Workers may be harmed from exposure to antimony. There are many industries and economies which do not rely on our population being exposed to dangerous elements. Further, as we are not currently mining these minerals, we will be unlikely to be world class in this area, and it would cost a lot of money to build up these industries. Importing the skills / knowledge to do this safely is both an economic and safety risk.

Conservation lands should be protected from all mining for their biodiversity values and ecosystem services.

Thank you

Thanks for your feedback, we really appreciate your insight. It helps us establish a long-term strategic approach to ensure that resource development for our economic prosperity happens in a responsible manner.

To help us continue to develop a Minerals Strategy for New Zealand to 2040, we would appreciate any additional suggestions or comments you may have.

Please leave your feedback here:

Above all, the Fast-track Approvals Bill must be dropped. This bill is actively harmful for all sectors, mining included. This is because it opens up workers and mining regions to exploitation from overseas corporations, with no opportunity for input from local communities, let alone the environmental, social, and public health impacts of some of the proposed projects. An effective, long-lasting, sustainable, and robust mineral strategy should not rely on anti-democratic legislation like the Fast-track Approvals Bill.