

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:

Ceridwyn Roberts

Email address:

Privacy of natural persons

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

Yes

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

No

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

D. The best way to describe your role is:

Academic/researcher

Please specify here:

Science communications expert

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.



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?

No, they are not suitable

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

Burying social & environmental impact within "Demonstrating the sector's value" prioritises economic value over the considerable long-term financial implications and wide-ranging risks of ramping up mining, particularly coal mining in Aotearoa New Zealand.

The strategy provided does not give a clear evidence-based framework for measuring the long-term, downstream effects of mining alongside current costs and short-term economic benefits.

Without discussion of the environmental costs of toxic tailings, polluted waterways, habitat loss, biodiversity loss, health & safety this pillar does not encompass the true costs of mining.

Without discussion of the social cost of locking in communities and industry into the dying coal industry and the ongoing damage to Aotearoa's reputation in continuing to extract and use coal as fossil fuel this pillar does not encompass the true costs of mining.

I would suggest a strategic pillar that is specifically about managing risks. This should focus on evaluating social, environmental and reputational 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.

Coal should not be a viable choice for extraction as it goes against our need to move towards a zero-carbon future. Aotearoa New Zealand can easily continue our journey to go 100% renewable in the near future.

Examining 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?

No, the actions are not the right ones and not ambitious enough

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

The answer options for 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. Instead, I believe the actions achieve neither of the strategic pillars:

- 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 absorbing 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.

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

Yes, there are

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

Not pouring money into uncertain businesses without full consideration of the risks – i.e. not opening up land to new or expanded mining industry.

Installing strong frameworks for assessment of any new minerals we chose to 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

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

Environmental, human health, legal challenges, land ownership challenges, requirements to decarbonise.

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.

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

We should not lock our economy into reliance on mining, 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.

In regards to mining of minerals of which Aotearoa has no experience of commercial extraction. It is unlikely that a newcomer to the game is likely to become world-class enough to offset the risks. Building these industries and skills is not cost-neutral and for minerals that pose health risks (such as antimony) it exposes our population to unnecessary risk, 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.

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. It exposes workers and mining regions to exploitation from overseas corporations, with no opportunity for input from local communities. It also fails to give adequate consideration to 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.