

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:

Email address:

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:

Yes, Ngā Motu Marine Reserve Society. We are a community group focused on the health of the marine environment. We are concerned about threats to the viability of marine ecosystems. We also monitor a local population of kororā, little blue penguins. We have submitted to government and the EPA on various matters connected with our concerns, including the Fast-Track Approvals Bill, and Trans-Tasman Resources Ltd's multiple applications to mine the seabed in the South Taranaki Bight.

D. The best way to describe your role is:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Academic/researcher | <input type="checkbox"/> Independent expert (please specify below) |
| <input type="checkbox"/> Consultant (please specify below) | <input type="checkbox"/> Business owner (please specify below) |
| <input type="checkbox"/> Tradesperson (please specify below) | <input type="checkbox"/> Student (please specify below) |
| <input type="checkbox"/> Industry group (please specify below) | <input type="checkbox"/> Other (please specify below) |
| <input type="checkbox"/> Industry participant (please specify below) | <input type="checkbox"/> Prefer not to say |

Please specify here:

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?

Mining is an extractive industry with environmental impacts which this strategy does not address. With particular regard to seabed mining, there is no evidence that this can be done without serious harm to marine ecosystems, particularly from the sediment plumes created from the mining and subsequent release of unwanted materials, some of which are toxic, into the water column. These sediments not only smother seabed organisms when they eventually settle, but they reduce available light for phytoplankton and benthic algae which are the base of the marine foodweb, reduce visibility for visual feeders like kororā, and will have as yet undetermined consequences for marine mammals like the resident population of pygmy blue whales.

Kororā for example, already face serious survival issues from reduced prey availability due to marine heatwaves caused by human induced climate change. We are very concerned about seabed mining adding in yet more environmental stress: will we see even more dead chicks in our

monitored nests because their parents are unable to find enough food for them because of the sediment plume effects?

We think there are other sources of minerals needed for a clean energy transition, and indeed, that Aotearoa might not be well placed to be looking to extract such minerals due to our small scale: environmentally responsible extraction and processing are likely to require much larger scale for this to be economic.

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?

We, along with thousands of others, strongly opposed the Fast-Track Approvals Bill on sound environmental grounds. This cannot be a key action of the Strategy.

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?

eWaste 'mining', based on some kind of advance disposal levy scheme to enable the reuse or recycling of electronic equipment instead of a one-way trip to landfill, needs to be seriously investigated. The eDay Trust, MfE and other groups have done much work on this in the past. The strategy action of accelerating a circular economy of critical minerals needs to be given priority. This should include legislating the right-to-repair for electronic goods such as cell phones, to interrupt the current planned obsolescence model which means products are unable to be repaired or upgraded beyond a certain point, in order that we are forced to buy the next model.

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?

How will the government and its agencies ensure there will be robust, unbiased, scientifically sound environmental impact assessments for mining projects? This includes monitoring during operation, and safe decommissioning, including if the operator abandons their project before completion.

Has any consideration been given to Investor State Dispute Settlement processes? What is the risk that the NZ government will be sued by overseas mining companies if we refuse to grant or extend mining permits and consents?

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.

Seabed mining should not be included in the strategy. The marine environment is already under stress from climate change. The undersea environment is extremely difficult to monitor for environmental impacts from extractive industries; adaptive management has been proposed in the past but by the time deleterious changes have been detected it may well be too late to stop or reverse the impact of such changes. There are other sources of the minerals needed for the clean energy transition that are much less environmentally destructive to access, including, as previously mentioned, 'mining' of ewaste.

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:

