

# Consultation submission form

## A Draft Minerals Strategy for New Zealand to 2040

MAY 2024

### How to submit using this form

This form is used to provide feedback on the draft Minerals Strategy for New Zealand to 2040.

When completing this submission form, please provide comments and reasons explaining your choices. Your feedback provides valuable information and informs decisions about the design of the strategy.

You can submit this form by 5pm, Wednesday, 31 July 2024 by:

- Email to [resourcesfeedback@mbie.govt.nz](mailto:resourcesfeedback@mbie.govt.nz) with subject line **'Minerals Strategy Consultation 2024'** or
- Mailing to:

**Minerals Strategy Consultation 2024**

Resource Markets Policy

Ministry of Business, Innovation and Employment

PO Box 1473

Wellington 6140

Your feedback will contribute to further development of a Minerals Strategy for New Zealand. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

## 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: Sue Cardwell

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  Independent expert (please specify below)  
 Consultant (please specify below)  Business owner (please specify below)  
 Tradesperson (please specify below)  Student (please specify below)  
 Industry group (please specify below)  Other (please specify below)  
 Industry participant (please specify below)  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](http://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  
preference

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 focus on economic value over social and environmental impacts in the mining sector in New Zealand raises concerns. Evaluating the net benefits of mining involves subjective measures and challenges in quantifying costs like pollution, habitat loss, and social impacts. A strategic pillar prioritizing risk

management for all stakeholders is recommended to address these concerns effectively. Emphasizing minerals that support a zero-carbon future and conducting thorough due diligence before mining new minerals are crucial for sustainable practices.

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?

The answer options for this question are biased and leading. My concern is not that the actions lack ambition but that they do not align with the strategic goals of enhancing the well-being of New Zealanders or facilitating a transition to clean energy.

I strongly oppose the Fast-track Approvals Bill as it compromises New Zealand's natural resources to large foreign corporations. The excessive control granted to 3 MPs by this bill raises concerns about corruption in the current government and in future administrations. This bill is unnecessary for a safe, productive minerals sector with high value.

Expanding or continuing coal mining is unacceptable due to its negative impact on the climate. New coal mines do not support a shift towards clean energy, a fact supported by scientific consensus.

I do not endorse seabed mining within New Zealand's territorial waters or beyond. Since 2022, the New Zealand government has backed a moratorium on deep-sea mining in international waters, acknowledging the need for a thorough understanding of its environmental consequences.

Local hapū and iwi near the Taranaki coast strongly oppose seabed mining. A government honoring Te Tiriti should respect the views of these guardians as seabed mining jeopardizes marine ecosystems and fisheries.

The ocean acts as a significant carbon sink, absorbing a quarter of global carbon dioxide emissions and most of the excess heat produced by these emissions. However, factors like plastic pollution, warming waters, ocean acidification, shipping, and cruise activities are diminishing the ocean's capacity to mitigate climate change. Seabed mining, known to harm marine environments, will further impair the ocean's ability to sequester carbon, exacerbating global warming. New Zealand should focus on being part of the solution to restore ocean health rather than contributing to 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 focusing on assessing extracted minerals for value in a decarbonised economy can lead to global leadership in conscious mining, metal recycling, and transitioning from coal to clean energy.

**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.

The economy should not solely depend on mining, especially fossil fuel expansion like new coal mines. There are alternative options for decentralized regional income such as value-added products and IT. Some minerals are harmful to human health, like Antimony, and can pose risks to workers. Protecting conservation lands from mining is crucial for biodiversity 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:

The Fast-track Approvals Bill should be abandoned as it poses risks to various sectors, including mining, by allowing overseas corporations to exploit workers and regions without local input or consideration of environmental and social impacts. A sustainable mineral strategy should not depend on undemocratic laws like this bill.