



SUBMISSION OF TE RŪNANGA O NGĀTI RUANUI TRUST

to

Ministry of Business, Innovation & Employment

on the

Draft Minerals Strategy for New Zealand to 2040

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Ngāti Ruanui

1. Te Rūnanga o Ngāti Ruanui Trust is the mandated voice of the 16 hapū of the Iwi, with more than 9,000 registered descendants. The takiwā of Ngāti Ruanui is bounded by the Whenuakura River in the south, the Waingongoro River in the north, the moana (including the coastal marine area) between the two rivers to the west, and the Matemateonga Ranges to the east.
2. As tangata whenua, Ngāti Ruanui is intimately related to the taiao – whenua, wai māori, moana, takutai moana – in a manner that is expressed through a range of cultural, social, economic and historical associations. We regard land, soil and water as taonga which provide unity and identity to us. These taonga are also a source of sustenance and enjoyment as well as economic development and employment.
3. Ngāti Ruanui is the kaitiaki of these taonga and is acknowledged as having mana whenua in its takiwā through te Tiriti o Waitangi, the Ngāti Ruanui Deed of Settlement 2003 (the Deed) and the Ngāti Ruanui Claims Settlement Act 2003 (the Ruanui Settlement Act).

Introduction

4. Ngāti Ruanui welcomes the opportunity to make a submission on the Draft Minerals Strategy for New Zealand 2040.
5. Ngāti Ruanui has been a significant party to oil and mineral development within South Taranaki over the last 20 years. We have been involved in both onshore and offshore developments. We have been the only iwi to have an active partnership with New Zealand's only deep-sea oil well production platform operated by OMV.
6. Further, Ngāti Ruanui has been a significant player opposing the proposed Trans-Tasman Resources Limited application to mine for iron sands off the South Taranaki Bight.
7. Ngāti Ruanui has been actively involved in both gas and oil prospecting, exploration and production at one time involved in 32 oilwell onshore consents.
8. Our expertise was acknowledged in the commissioned publication “Best Practice Guidelines for Engagement with Maori”.

The Strategy

9. The Draft Minerals Strategy released provides a very simple and wide look at mineral development over the next 20 years. Overall, the strategy has very little detail and provides only a brief expression of policy to underpin the document “How we'll get there”.
10. Overall, we consider the strategy would benefit from more discussion, substance of intent and partnership development with mana whenua. We consider aspects of the strategy that relate to a clean energy transition would benefit from a specific and detailed look at key partnerships with Iwi.
11. Ngāti Ruanui considers that there is a significant role for oil and minerals in a “just transition” process, over the next ten years, especially in the area of gas production. Without a careful and somewhat conservative plan for gas supply, energy poverty could

a be real issue facing our people. Ngāti Ruanui does not wish to be constrained to an ideological goal for renewable energy where all of community cannot participate in the benefits. We do not consider a careful and collaborative partnership with the Crown would slow down the shift to renewable energy sources, but rather position us for a more dedicated planned approach. The strategy has failed to grasp the concept (other than a brief note on rights and interests) of working in partnership with Iwi to achieve a more positive outcome. **Ngāti Ruanui wishes to explore this type of option with the Government in the draft Strategy.**

The Need for Regional Approaches

12. Further, Ngāti Ruanui advocates for a more deliberate and bespoke view of mining opportunities in a three-way collaborative approach with the government, iwi and industry. This would work on a regional basis where mining/mineral extraction was defined with the delivery of a “Minerals Development Plan” identifying resource, location and extraction methodologies. Taking this even further, such planning would also link to rights and interests for mana whenua, and linkage of Crown Royalties being directly invested back into the regions.

Seabed Mining

13. Ngāti Ruanui is concerned about the identification of vanadium and titanium to be extracted through seabed mining. **Ngāti Ruanui opposes all seabed mining activities on the grounds that material harm to the environment cannot be mitigated.** Ngāti Ruanui’s position has been validated over the last 15 years through every layer of the judicial system through to the Supreme Court. This is not just a view of ours but also our community, fishing groups as well as the South Taranaki District Council. It would appear that the strategy is being used as “trojan horse” to allow for the current Trans-Tasman Resources application along with other seabed mining opportunities. The statement, “we will find out more about deep-seabed minerals and access ...” is an affront and insult to Ngāti Ruanui, and 15 years of environmental evidence which proves deep sea mining would be an environmental disaster.
14. **Ngāti Ruanui believes that deep sea mining should be banned until independent verified evidence can be produced that environmental material harm can in fact be mitigated. This needs to be role of the Crown rather than industry given the wide-ranging impact.**
15. **Ngāti Ruanui seeks direct discussion with the government on seabed mining as a matter of urgency in the context of this strategy.**

Preferential Pathways

16. The concept of preferential pathways for development needs further understanding and its linkage to any change in regulatory reform. Ngāti Ruanui does not support an undefined concept as expressed in the strategy. The brevity and weakness of the strategy is revealed with such ideas/concepts having no supporting detailed policy intent.

Regulatory Reform

17. Ngāti Ruanui does not oppose changes and review of the consenting and permitting regimes under the Crown Minerals and RMA legislation. These pieces of legislation have not served mana whenua well and often resulted in confusion between the two to create complexity of process. However, the reliance of the draft strategy on recent fast track consenting legislation is not supported.
18. All mining has impact, much of which is high impact. The effects on the environment are often significant, including:
 - a. Habitat destruction
 - b. Pollution of waterways and soils, harming local communities, wildlife, and ecosystems.
 - c. Carbon emissions especially those involving coal, could increase carbon emissions, conflicting with global efforts to combat climate change.
19. If the intention is to achieve a high standard and not allow mining to come at the expense of environmental outcomes, a robust and inclusive consenting regime must be established. Maintaining our position of having world class consenting systems must be preserved. **We recommend that reliance on the fast-track legislation is removed from the strategy and replaced with a more sophisticated review of the permitting and consenting regime.** Consenting could be linked to a more regional bespoke approach, as described above, and specific national direction could be provided to achieve this. Ngāti Ruanui supports a faster more efficient National Direction approach.
20. Ngāti Ruanui also considers that the EEZ consenting regime should be excluded from any review or inclusion in fast-track consenting. We consider the approach set out in the EEZ legislation has proven itself as being fit for purpose beyond the 12 nautical mile zone.
21. Overall, any preferred pathways for development needs to be developed within a Te Tiriti partnership setting including community collaboration.

Treaty Rights and Interests

22. The statements concerning the recognition of Treaty Partners is acknowledged. However, the statement is broad and without any specific detail. Our suggestions above are more likely to open up better discussion about recognition of rights and interests and a meaningful partnership model. A regional partnership model is likely, in the long term, to provide a much higher level of security to industry and international investment. Long term investment will need a clear social licence to operate. **Ngāti Ruanui wishes to explore an approach where this could be modelled and reflected in the strategy.** Such a model is growing with recent offshore wind energy companies, and we see parallels in approaches being taken here with a transitioning minerals sector. This approach would be a more robust way forward and reflect a new way of working together.

Support

23. Ngāti Ruanui supports the concepts of the circular economy and the approach of mineral recovery, re-use and recycling technologies. Links back to national and regional waste strategies should also occur.
24. Increasing public knowledge and confidence in the sector is generally supported. Including the monitoring of the impacts of mining activities within a regional context. We do however recommend that specific reference is made to mana whenua impact in the context of environmental, social and cultural outcomes.
25. Encouraging the increase in local workforces through employment, training and contract for services is supported. Ngāti Ruanui believes these concepts have worked well in the past and should be part of the overall transitioning workforce plan for a region such as Taranaki. Linkages back to positive outcomes for iwi and mana whenua is important here; building upon the concepts of local/regional partnership.

Conclusion

26. The draft Minerals Strategy is brief and without any real supporting policy position. This makes it hard to provide any specific and meaningful feedback.
27. Ngāti Ruanui supports strategy that has clear and aligned connections. This strategy fails to provide adequate linkage to the transitioning renewable energy sector, and fails to provide a clear pathway where renewable and mineral extraction can sit side by side.
28. Mana whenua need to be a clear and positive collaborative partner with government, industry and the community going forward. We believe the strategy has missed this opportunity. We consider regional mineral development plans, bespoke to a location, would enable that partnership to flourish and provide firm social licence to operate.
29. Ngāti Ruanui would welcome further discussion on the strategy.

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