

Consultation submission form:

A Draft Critical Minerals List for New Zealand

October 10, 2024

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

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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:

Coromandel Watchdog of Hauraki

D. The best way to describe your role is:

- Academic/researcher/research institute Independent expert (please specify below)
 Community group (please specify below) Business owner (please specify below)
 Consultant (please specify below) Environmental NGO (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:

<p>We are a grass roots environmental advocacy group that has been working to protect our environment for more than 40 years.</p> <p>I am the coordinator.</p>
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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 Draft Critical Minerals List for New Zealand

MBIE is developing a critical minerals list for New Zealand to identify the minerals that are:

- essential to New Zealand's economy, national security, and technology needs, including renewable energy technologies and components to support our transition to a low emissions future; and/or
- in demand by New Zealand's international partners to enable us to benefit from international economic opportunities, contribute to the diversification of global mineral supply chains and improve the pipeline of the end-use products for which these minerals are essential; and
- susceptible to supply disruptions domestically and internationally. In some instances, we rely on domestic sources of minerals, but the supply of these minerals can be constrained, for example by regulatory factors and social licence. Internationally, supply chain disruptions could arise due to geopolitical risks and external market forces.

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 are also essential to modern economies as they are needed to manufacture advanced technologies such as semi-conductors, defence applications and medical equipment. Minerals are also critical for a clean energy transition as low emission technologies requires more mineral inputs than those fuelled by fossil fuels.

The extraction and processing of the minerals essential to New Zealand and our international partners are concentrated in a few countries. Any disruption that interrupts operations at a large facility or group of facilities can have a major impact on supply availability, and therefore on prices. The greater the concentration of production the larger the affect a disruption can have.

In addition, New Zealand does not manufacture a wide range of technologies, we are generally an end consumer of many products produced internationally and rely on the functioning of international supply chains and their access to resilient supplies of minerals.

The development of a critical minerals list is one of the key actions identified in the draft Minerals Strategy that was publicly consulted on from 23 May – 31 July 2024. Due to the technical nature of the list, MBIE engaged a consultancy with specialist expertise, Wood Mackenzie, to support the development of the list.

We are seeking feedback on the content of the draft list that has been developed by Wood Mackenzie for New Zealand. It identifies the minerals that are critical to New Zealand and summarises the reason for their inclusion in the list. Once the list is finalised, actions could be identified to help us reduce the 'criticality' of those minerals, i.e., secure better access to them.

Please see the draft Critical Minerals List attached below for more information.

Questions for the consultation:

1. Have we missed the inclusion of any mineral(s) on the draft Critical Minerals List?

Yes, (please provide more details below) No, the list is okay. Not sure/no preference

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

2. Have we included any mineral(s) that you think should not be on the list?

Yes, (please provide more details below) No, the list is okay. Not sure/no preference

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

1. The selection of minerals should be informed by kiwis - both general public and specific interest groups- beyond the minerals industry and it's adjacents.
2. 'Mineral use, and what is tangibly 'critical' to kiwis, is an important conversation that the Government should have with the public; ensuring that people get a good understanding of how minerals are used both what is mined here, and what is imported.
3. Considering minerals such as Arsenic, which is increasingly on the decline as a wood treatment, both internationally and in Aotearoa, is not appropriate for the list. Aotearoa already has had, and continues to have, serious problems with Arsenic creating serious threats to public health from mining wastes left in tunnels and pockets around historic mining areas such as Hauraki.

3. Do you have any further feedback on the list, or the methodology under which it was developed?

Yes, (please provide more details below) No, the list is okay. Not sure/no preference

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

1. This Critical Minerals List (CML) seems premature, in the sense that there has been no wider discussion around what minerals kiwis think are 'critical', what understanding kiwis have around what minerals we actually use, and what we actually need: what is actually 'critical' to our society.
2. It is unclear if any consideration has been given to opportunities for Aotearoa, or developments in other nations, in and around circular mineral use - the need to advance our capability to reuse 'critical' minerals where possible.
3. It is not clear what actual 'critical' needs have been identified, and whole has been involved in this work beyond the minerals industry.
4. CML can be informed and influenced by a number of factors, and it is vital the the Government overseeing the development of such a List should facilitate the ability of the public to participate in these processes. This participation increases the robustness of the decisions made.
5. We were surprised to see the entire List was formulated by a consulting firm, rather than their report being one of many that inform a list that the Ministry produces. It appears that the only 'stakeholders' consulted were minerals industry or adjacent, which seems to be an unnecessarily narrow scope of knowledge to draw on to inform such a list.
6. Many Critical Minerals Lists, (CML) are formulated in response for the need for energy transition, and or with significant consideration of military considerations. We need to be clear what emphasis is informing our list preparation - and indeed even the need for us to have one.
7. Including the 'role we can play' in supplying our partner countries is laughable; Aotearoa has a tiny amount of minerals compared to countries like Ai=ustralia, Canada, the US and others. We must not aim, with our tiny land mass, to be a 'player' in the extractive industry, and we do not agree that this be a factor in weighting mineral criticality.
8. In summary, we do not believe that the proposed critical minerals list will be helpful in informing Aotearoa's direction moving forward, given that it has been prepared in a vague way, with little scope beyond the industry that directly benefits from the extraction of these same minerals to inform it.
9. This list, with it's lack of informed and considered contribution, is not meaningful, and we would recommend that rather than pursue this, Government engage with the UN and other best practice guidelines on considering the need, and if there is one, the scope, for the development of such a list.

Thank you

Thanks for considering our submission.