

Introduction

Name:

Privacy of natural persons

Email:

Privacy of natural persons

Business name or organisation (if applicable):

RSC Mining & Mineral exploration Limited

Position title (if applicable):

Privacy of natural persons

Is this an individual submission or on behalf of a group or organisation?

Behalf of group or organisation

Please indicate which group you most identify with or are involved in?

Please specify the group that you most identify with

Please indicate which type of group your submission represents.

On behalf of "other" group/organisation

Please specify the group or organisation that your submission is on behalf of.

RSC Mining & Mineral Exploration Ltd - Consulting Group

Vision

Do you agree or disagree with the overall vision for the minerals and petroleum sector in New Zealand?

Neither agree nor disagree

Why?

As a vision, the draft proposed is appropriate but not unique to New Zealand. This type of vision is the aspiration for the sector globally and for individual companies. However, to be world leading industry needs to have a framework of investment certainty as they continually modernise equipment, operations, systems and management tools. This is closely linked to access to potential resources, or at least the permissible geology initially, and excessive limitations on this (such as via a proposed No-New Mines policy or access to conservation estate) inhibit in part being able to deliver on the proposed vision.

What is your vision for the minerals and petroleum sector in New Zealand?

Our vision for the minerals and petroleum sectors is one that continues to build on the modern industry and environmental management systems that we currently have. Promotion of mineral exploration to enable the discovery and development of economic deposits, which can also be utilised for value-add products. The continuing goal is to maximise the contribution of the mining sector to the economy, with due regard to its social and environmental impact. Additionally, the vision should include recognition of the contribution of mining/mineral to our society and standard of living and that mining and protecting the environment are not mutually exclusive.

How can New Zealand sustainably derive value from its petroleum and minerals resources?

For New Zealand to definitively understand how it might derive sustainable value from its petroleum and mineral resources it must first understand with a greater level of detail, for minerals in particular, where the permissible geology is to host the varied mineral systems that contain metals of economic value. Without having this knowledge, whether it be on Conservation land or not, a long-term strategy regarding sustainability of the sector will remain un-informed and successive governments ill-informed. Not understanding the potential becomes a limiting factor in attracting investment to not only exploration and mining but also research and investment into value-add products. New Zealand needs to progress itself along the knowledge value chain in regard to its mineral estate through increased government funding for research and making the investment environment more attractive to exploration and mining companies so that they utilise their funding to provide new information and data on the mineral estate. Through these avenues, New Zealand will be in a better position to understand what is possible in relation to minerals associated industries (such as carbon foam, carbon fibre, battery chemicals, nanotechnology etc).

Objectives for the minerals and petroleum sector

Objective for a sector that: “Responsibly delivers value for New Zealand (a) Supporting a productive, sustainable and inclusive economy (b) Supporting New Zealand's transition to a carbon neutral economy”.

Agree

Why?

We agree with the objective that mining responsibly delivers value for NZ through: Supporting a productive, sustainable and inclusive economy (b) Supporting New Zealand's transition to a carbon neutral economy. We support this as the mining sector is already a key contributor to society, our current standard of living and regional economic development. The transition to a carbon neutral economy is a worthy aspiration and the minerals and petroleum sector will be critical to achieving this in a manner that is not detrimental to our standard of living, economic well-being, and potentially supplying the critical minerals necessary for a low carbon economy (metals and materials for renewable energy options for example).

Objective for a sector that: “Is productive and innovative”.

Agree

Why?

We agree with the objective for the sector of being ‘productive and innovative’, as one directly links to another. A productive and vibrant sector attracts investment into the systems processes and adoption of new technologies related to exploration and mining operations. Innovation is necessitated out of several influencing factors including the type of mineral and mineral system, geographical location, environmental management and health and safety for example. The minerals and petroleum sectors have always been early adopters of new technologies such as automation, artificial intelligence and machine learning for example. Product innovation is driven by the needs and demands of society but require the requisite minerals or materials to enable innovative value-add products to be produced.

Objective for a sector that: “Is effectively regulated”.

Agree

Why?

We agree that an effectively regulated industry is a sound objective. This creates an environment where appropriate standards of behaviour are outlined, and repercussions are adopted that can influence behaviours. Regulation however should be enabling, rather than preventative or obstructive. This is necessary to ensure the earlier stated objectives of seeking a ‘productive and innovative industry’ and ‘Responsibly delivers value for New Zealand (a) Supporting a productive, sustainable and inclusive economy (b) Supporting New Zealand's transition to a carbon neutral economy’. It should be noted that many individuals and companies hold membership with global institutes such as the Australasian Institute of Mining and Metallurgy, which set a charter, guidelines and standards by which its members should abide by as industry professionals.

Are there any other objectives for the minerals and petroleum sector that you would like us to consider in the strategy?

We consider that two additional objectives should be included: • Working more closely with the regions to support their understanding of their mineral potential, the regional economic development potential and the potential positive influence the minerals or petroleum sector could have on environmental protection or community development aspirations. • Work to provide simple-to-understand information for the general public on the process and contribution to society of exploration and mining. In particular highlighting the fact that modern mining in New Zealand is conducted responsibly and its track record is very good. Effort needs to be made to counter the often-disappointing ill-informed critical statements about environmental impact of the sector, when many of those making these statements appear to be comfortable utilising minerals and materials from other countries whose environmental and social records are inferior to New Zealand's (e.g. cobalt from the Democratic Republic of Congo where the cobalt is used in clean-tech equipment such as batteries). Associated with this proposed objective is assisting the New Zealand public to understand what trade-offs might be necessary if mining and petroleum extraction is limited. Examples include less royalties generated for government from these industries to allocated towards hospitals, schools, infrastructure etc; additional cost and expense for products/services (fuel, electricity, commodities for clean-tech products).

Guiding principles

Principle: The environment, ecosystems, and biodiversity are respected now and in the long term.

Agree

Why?

We agree that environment, ecosystems, and biodiversity are respected now and in the long term. These areas are important to New Zealander's quality of life that we enjoy. It is however noted that, the occurrence of economic concentrations of minerals, sources of aggregate and existence of oil and gas are dictated by certain geological conditions. Without permissible geology, these resources cannot exist and often that intersects with areas that also have varying levels of conservation value. We have robust environmental management legislation and practices to manage the effects of

mining and exploration and as such projects should be assessed on a case by case basis. The overall footprint of mining on the Conservation estate is miniscule, and even if activity was double would still be less than 1% of the Conservation estate. Mining and protecting the environment are not mutually exclusive and in fact, direct contributions by mining companies is/has been used for conservation and environmental management efforts (e.g. OceanaGold's contribution to willow tree eradication on West Coast lake edges). A more robust industry could provide additional financial and technical contribution to conservation management.

Principle: Māori cultural interests are understood and respected.

Agree

Why?

We agree that Maori cultural interests are understood and respected, but Maori economic objectives should also be considered. This is particularly relevant in relation to Pounamu, most of which is recovered in association with other minerals - particularly alluvial gold, and which much of this type of mining is within conservation estate. In addition, Maori have business or employment interests in the sector or related service providers.

Principle: Support the transition to a carbon neutral economy by 2050.

Neither agree nor disagree

Why?

In general, we support this aspiration and the minerals and petroleum sector will be critical to achieving this in a manner that is not detrimental to our standard of living, economic well-being, and potentially supplying the critical minerals necessary for a low carbon economy (metals and materials for renewable energy options for example). We are however concerned that in order for the sector to be able to contribute to this the investment climate must be positive, access to the areas where permissible geology for hosting clean-tech minerals (including aluminium, copper, nickel, REE, gold and silver – as these all contribute to clean technologies) must be available and the general public require education on the pathway to the desired carbon neutral economy needs the contribution of mining.

Principle: The impact on people, communities and regions are managed in a just and inclusive way.

Agree

Why?

We of course agree with this principle, as any negative impact on a sector of any regional economy has broader reaching impacts on the community or region as a whole (e.g. unemployment, reduction of wages going into local economy from those directly employed in the sector or as an associated service provider, population decline). Those potentially impacted negatively also need to understand how their skills may be transferable to another part of the industry (associated with clean technology's, value add products, research etc).

Principle: Support a circular economy by meeting resource needs through resource efficiency, recycling and reuse.

Neither agree nor disagree

Why?

The importance of a circular economy is acknowledged and maximising the use and re-use of metals and materials where possible would be advantageous. However, the process of doing so must be economic and energy efficient – many current processes are energy intensive. Unless there is a public policy case for this to occur, and incentives are put in place to ensure the business case makes economic sense then the uptake may be limited.

Principle: Actions taken within the mineral and petroleum sector should align with the strategic direction of other related sectors and Government strategies.

Neither agree nor disagree

Why?

We are ambivalent regarding this principle. An aligned government is positive if it creates a level playing field for the extractives industry and the benefits to the economy are articulated and considered in a fair and transparent manner. For example, we would be concerned if it was used by the current or future government as a rationale to put in place unnecessary and unfair environmental constraints on the mineral exploration and extractive industry. The proposed Biodiversity policy statement is an example. It is important in our view that the strategic direction of other related sectors and government strategies also aligns with the resources strategy and that MBIE does not acquiesce to matters that may negatively impact the industry.

Do you agree or disagree with each of the following principles for the Crown?

Principle: The Crown honours its duty towards Māori as a Treaty partner, adheres to the Principles of the Treaty of Waitangi and its duty to meet settlement commitments.

Agree

Why?

We agree with the principle that the Crown honours its duty towards Māori as a Treaty partner, adheres to the Principles of the Treaty of Waitangi and its duty to meet settlement commitments in relation to the minerals sector as the co-operation and information exchange between parties is an important aspect of all parties understanding possible concerns or opportunities. The Crown's interaction with iwi, while separate to industry's interaction with iwi, adds another level of communication between all parties.

Principle: The Crown receives a fair financial return for its minerals and petroleum.

Strongly agree

Why?

We strongly agree that the Crown receives a fair financial return. The revenues generated by fees and royalties in particular contribute to funding other areas of society such as healthcare, education and infrastructure and are a positive influence on our quality of life. This impact needs to be articulated more forcefully to the general public coupled with highlighting what the contribution is in real terms (i.e. more teachers, nurses, school class rooms etc) and counter to this what society would miss out on without the industry's contribution. The Crown needs to remain conscious not

to set terms for royalties that would detract from further investment or make existing operations uneconomic.

Principle: The Crown regulates in a way that is fair, transparent, reasonable and proportionate.

Agree

Why?

We agree with this principle, as this is what is expected of a modern transparent government. However, in relation to the minerals sector, the mining industry is often pilloried as destructive, dirty and criticised for its environmental impact. It is often singled out from other perhaps more destructive industries to the environment such as forestry or even tourism. If the Crown is going to regulate environmental management in a fair, transparent, reasonable and proportionate manner then it must not be industry specific or biased against exploration and mining

Principle: The Crown honours the rights of current permit holders to continue production or exploration activities under existing permits.

Strongly agree

Why?

We strongly agree with this principle, the significant investments made into exploration and mining projects is reason in itself. Additionally, lack of certainty around this would have a domino effect due to reduced regional economic development in regional New Zealand.

Principle: The Crown makes policy decisions based on the best evidence, and accounting for the foreseeable need for minerals and petroleum, both now and for future generations.

Agree

Why?

We agree with this principle, and would encourage the Crown to ensure that they have the best available information, or commission research or studies into collecting this information prior to putting in place any policies that would detrimentally affect access to minerals, materials or resources that could be extracted to support a transition to a low carbon economy, support regional economic development and potentially limit desired value add, innovative products from our minerals and materials.

Principle: The Crown proactively engages and consults with relevant stakeholders and decisions are communicated in a clear and transparent way.

Agree

Why?

We agree with this principle as we consider that Government has a role in informing the public of the importance and contribution of minerals and resources including for the low carbon economy. Adopting a balanced Resource Strategy can and should go some way to do that. It is unfortunate that the mining industry's reputation among some sectors of the community, most of which have had little or no exposure to the

industry (although continue to be ignorant to their use of its products in day to day life) is seen in a poor light. It is unfortunate that minerals' significant contribution to society is often not well appreciated by the public at large and the Crown should play a role in ensuring the general public are well informed as to the importance of minerals to modern living standards and the need for new minerals for the proposed low carbon economy.

Do you agree or disagree with each of the following principles for Industry?

Principle: Pursue continuous improvements in health and safety.

Agree

Why?

We agree with this principle. Health and safety management and systems are a key tenet of any modern business. Opportunities for improvement that protects the welfare of staff is a vital component for engendering a business being an employer of choice, creating a productive working environment and receiving support from the general public or investors.

Principle: Strive to implement industry best practice in operations.

Agree

Why?

We agree with this principle. A modern, world-class industry already exists in New Zealand. Companies who consciously seek to make ongoing improvements by adopting best practice (operationally, technically, environmentally and socially) do so in the knowledge that it leads to improved revenue/profit, attraction of investment, selection as a materials/mineral's provider of choice and as a desired employer.

Principle: Seek innovative ways to improve the resource efficiency of extraction operations, and minimise the negative impacts of these operations.

Agree

Why?

Agree with this principle. The mineral and petroleum sectors have long been early adopters of new technology. As with implementing best practice Companies who consciously seek to make ongoing improvements by adopting best practice (operationally, technically, environmentally and socially) do so in the knowledge that it leads to improved revenue/profit, attraction of investment, selection as a materials/mineral's provider of choice and as a desired employer.

Principle: Engage with stakeholders and implement management systems to understand and manage impacts, and realise opportunities for redress where needed.

Neither agree nor disagree

Why?

It is difficult not to agree with this principle as obtaining the social licence to operate is key. However, it also requires stakeholders to engage in a balanced manner in an attempt to find middle ground on contentious items or plans. To be in a position to do this there must be a willingness to listen. The Crown has a role in this regard through ensuring that the general public understands the industry, the benefits it has to our

society and standard of living and how it can contribute to the desired low-carbon/clean-tech economy.

Are there any other principles you would like us to consider in the strategy?

New Zealand should be strongly promoted as an investment destination, particularly if we want to compete internationally in regard to supply of minerals and materials for a low-carbon/clean-tech global economy. In order to identify the opportunities, exploration investment is needed and if this is not funded by government then it needs to be source via private options. New Zealand has a competitive advantage in that we could be regarded as a supplier of choice (if economic quantities of the required materials are located) given our highly regarded status on business transparency, robust environmental legislation and appropriate labour laws. This may also encourage downstream high value product development/manufacturing investment if sustainable supply of minerals or materials can be located and economically extracted.

Action areas intro

Action Area: Modernising the Crown Minerals Act

Agree

Why?

We agree that there are some aspects of the CMA that need to be modernised to be fit-for-purpose for a continually changing and cyclical industry.

What future actions would you like us to consider under this Action Area?

Any actions made need to be enabling to the industry to ensure a long-term, vibrant and sustainable industry that can continue to progress and add value to New Zealand's economic well-being and growth. Any changes need to ensure alignment with priorities around affordable energy, housing, urban development, roading infrastructure and regional economic development. They also need to support the aspirations to utilise our own resources when transitioning to a low-carbon economy, clean technologies and sustainable agricultural practices (organic fertilisers). We would like to see the retention of the CMA's current emphasis on the promotion of prospecting, exploration and mining of Crown owned minerals for the benefit of New Zealand and are opposed to any significant changes to the fundamental role of the CMA. The minerals sector fully acknowledges the importance of environmental considerations, but we think they are best addressed in specialist legislation and so do not need to be brought into the Purpose Statement of the CMA as is one of the proposals likely to be considered as part of the review. As such we do not support the government 'no new mines' on conservation land objective and do not think it needs to be reflected in the CMA.

Action Area: Securing affordable resources to meet our minerals and energy needs

Agree

Why?

We agree that securing affordable resources to meet our minerals and energy demands is important. An important start would be to understand what these needs are or are projected to be and then where they are going to be sourced from. In doing so, we could begin to understand what surplus may exist to be sold on a global market.

What future actions would you like us to consider under this Action Area?

It is imperative the government undertakes a strategic stocktake of known resources and areas of permissible geology which have the potential to host necessary mineral deposits. This stocktake should be undertaken irrespective of existing land use and then triaged to those areas where there is an acceptable balance between economic development, environmental management and social acceptance. In conjunction with this the alternatives should be presented (i.e. sourcing internationally and associated cost/benefit analysis). It is important that this knowledge base is built as it informs many of the choices New Zealand will confront in future.

Action Area: Improving Treaty partnership

Agree

Why?

We agree that the Crown improving Treaty partnership is a positive not only to the minerals sector but also to society.

What future actions would you like us to consider under this Action Area?

We would like the Crown to be highlighting the business opportunities from the sector and providing case studies of successful iwi associated businesses in the minerals sector (e.g. West Coast Pounamu), and the influence that they can have in ensuring that any operation proceeds with their concerns understood and participation in potential solutions.

Action Area: Improving stakeholder and community engagement

Neither agree nor disagree

Why?

While we some-what agree with the sentiment of the statement that ‘Effective and genuine engagement with stakeholders and our wider communities by the minerals and petroleum industry is key to building trust and generating social licence to operate’, this currently reads as though the industry is not doing this. It is a two-way street and all parties, including opponents to the sector, need to be presented with all relevant information and seek clarification where aspects are not understood, to ensure a sensible dialogue happens.

What future actions would you like us to consider under this Action Area?

It is unfortunate that some parts of society fail to acknowledge the contribution of the minerals and petroleum sector to their standard and comfort of living (while benefiting from it on a daily basis), the impact that it has on regional economic development (even though they may not be directly employed in the sector), and the necessity of it to support NZ’s aspirations of a low-carbon economy. We believe the Crown has a vital role in articulating minerals’ significant contribution to society and a balance resources strategy can aid in achieving this.

Action Area: Improving industry compliance

Agree

Why?

We support ongoing industry compliance that is fit for purpose, enables business to prosper and polices those that choose to operate outside good industry practice.

What future actions would you like us to consider under this Action Area?

We would like to see the Crown have rated its systems and compliance approach against international best practice (international jurisdictions – Australia, Canada, Ireland for example) with a view to understanding if they are on par or identify changes for improvement, particular if they provide opportunities for investment encouragement with damaging reputation.

Action Area: Research and investment in better mining and resource use

Agree

Why?

We are in support of the objectives associated with research and investment in better mining and resource use as this has the potential to open up a broad range of commercial opportunities for the country.

What future actions would you like us to consider under this Action Area?

We would like to see that some emphasis is placed on utilising better understood resources such as coal for use such as carbon foam, gold for Nano-technology and silver for anti-bacterial properties.

Are there any other action areas you would like us to consider as part of advancing this Strategy?

Other

Are there any other comments you would like to make about the “Minerals and Petroleum Strategy for Aotearoa New Zealand: 2019-2029”?

The document also seems to imply that mining for minerals used for green tech is better than current mining activity. The not to subtle push for Lithium exploration in the North Island seems odd. The main minerals required to build green infrastructure (windfarms, hydro dams, tunnels, sea walls, new foundations, commuter trains) are iron ore (so push ironsands), aluminium (so push the smelter); concrete (push limestone); rock and aggregate (support quarries close to infrastructure). Our country should also try be self-sufficient in regard to commodities. We should not be importing commodities we use locally, i.e. coal, iron ore, phosphate, oil and gas. There is a subtle undertone in the document that seems to reflect that the minerals and petroleum sector is not socially and environmentally responsible which is unfair. Additionally, there is a strong thrust that the sectors don't engage well with many stakeholders. Again, this is often unfair and particularly opponents of the industry have a default position to say 'no' to a project proposal either through not informing themselves appropriately or choosing to philosophically oppose mining and exploration rather than engaging in a balanced debate. Engagement in this sense is always going to be difficult if one party chooses not to engage. Uncertainty around the proposed 'no-new mines' on conservation land and the biodiversity strategy creates investment uncertainty be it in relation to investment into exploration or into modernising equipment, management systems, existing operations or research.

If you wish to, attach a document to this submission.

Use and release of information

We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?

Yes

Can we include your name?

No

Can we include your email address?

No

Can we include your business name or organisation?

Yes

Can we include your position title?

No

**Can we include the group you most identify with (if submitting as an individual)?
Can we include the group your submission represents (if submitting on behalf of a group or organisation)?**

Yes

If there are any other parts to your submission that you do not want public on the website please note them below:

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