

Introduction

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Business name or organisation (if applicable):

Coromandel Watchdog of Hauraki

Position title (if applicable):

Chairperson

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

Privacy of natural persons

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.

Non-governmental Organisation

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

Vision

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

Strongly disagree

Why?

This vision is contradictory, with rapidly escalating effects from fossil fuel emissions the industries need to recognise their contributions to greenhouse gases and their energy use. Our organisation is focused on minerals but we reject a vision based in the assumption that petroleum based products are the fuels of the future, Just Transition to clean energy sources should be core to the vision. We also need to see a Crown strategy recognise its responsibilities to Te Tiriti o Waitangi and make a commitment to honouring Article 2 which affirms tangata whenua rangatiratanga over all natural resources.

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

Our vision is that minerals extraction from the environment is drastically reduced and mining of waste, particularly e waste becomes the major focus . Our vision is the end to gold mining in our region and across the country and a thriving “urban mining” industry that extracts minerals from waste products. .

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

Aotearoa cannot “sustainably” derive value from petroleum, its causing climate chaos. We need to develop urban waste mining instead of minerals extraction

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”.

Strongly disagree

Why?

Petroleum cannot “ responsibly” deliver value, it can only continue to build risk from emissions, its a huge challenge to shift away from an oil dependent economy and society but we must do this and Government should be leading with strategic thinking. Minerals are also extracted at a huge price to the environment and although many are useful they can be endlessly reused, hence the need for leadership on mining of waste for minerals.

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

Disagree

Why?

If the objective means “ productive and innovative” within the current framework we cannot support this objective, if it means within a Just Transition framework to uran waste mining and clean energy, we can support it

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

Strongly agree

Why?

To be effectively regulated the CMA purpose needs to change as well as the implementation of the CMA Act. In addition the monitoring under the RMA needs to be properly resourced and regulations should be based on the precautionary principle not an industry that monitors itself, e.g, dats from Oceana Gold on effects of underground blasting is based on the company monitoring and records from Waihi.

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

Yes, we would like to see the following : a. A commitment to a phase out of fossil fuels with Just Transition plan and timeframes, b. A commitment to no new mines on DOC land as announced in the Speech from the Throne 2017, an objective to commit the Crown to directly negotiate all mineral extraction consents with tangata whenua hapū, an objective to phase out minerals extraction and phase in urban waste mining, an objective that ends the rubber stamping of application for minerals consents by MBIE minerals division,

Guiding principles

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

Strongly agree

Why?

Respecting the environment, ecosystems, and biodiversity is fundamental to all activities we undertake. This would eliminate a toxic extractive industry which creates waste dumos,

Principle: Māori cultural interests are understood and respected.

Strongly agree

Why?

We agree however, the term “ cultural interests” is not a clear commitment to Te Tiriti rights of tangata whenua, of course understanding and respecting these kaupapa is vital but its not cleaf what this means or how the Crown will “ understand and respect” cultural interests given the fact that the Crown has taken

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

Disagree

Why?

We support the concept but the date should be brought forward to 2030

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

Strongly agree

Why?

After 40 years of engagement in this issue in the Hauraki Coromandel we have even less ability to negotiate impacts than 10 years ago. The RMA non notification provisions and the CMA purpose to promote mining has reduce our input and excluded our participation in the democratic processes alleged to give us a say. The presumption that minerals development is beneficial to our communities has been subject to no proper cost benefit analysis, especially in terms of long term costs of externalities e.g water contamination, tailings dump maintenance or clean up. The Tui Mine is a tiny example of real costs to the community with no industry responsibility. The bonds and arrangements for post mining at Waihi are also highly problematic in terms of industry responsibility and risk to communities. There has been no justice in the 40 years of struggle for a fair participation of tangata whenua and local communities over the costs and risks of mining at the expense of other more positive activities - we benefit clearly from the low impact recreation activities in our forests but not from gold mining.

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

Strongly agree

Why?

The “ Circular economy” needs proper definition, we fully support reuse of minerals from waste dumps and e waste, but not while continuing to extract resources via dinosaur industries reliant on fossil fuels and mining that leaves a toxic legacy. You cannot have it both ways.

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

Strongly agree

Why?

The Government says climate change is our nuclear free moment so logically petroleum must be phased out and replaced by renewables. The Government has said that mining will be banned on conservation land. The Minerals Strategy needs to reflect these high level commitments and not continue to facilitate industries that exacerbate environmental risks and costs.

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?

But - the principles of Te Tiriti were invented by 1980s lawyers, we want to see a commitment to the articles of Te Tiriti o Waitangi written in Te Reo and signed at Waitangi in 1840 . The settlement commitments are the least of Te Tiriti responsibilities. This strategy needs to commit to permanent negotiation to uphold Te Tiriti relationships in all aspects of minerals policy.

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

Neither agree nor disagree

Why?

This statement is based on a presumption that the Crown owns mineral and petroleum and that these extractive activities will continue into the future. We do not accept these premises and we also do not accept the low level of royalties and taxes the industries have paid to the Crown. We do not wish the Crown to rely on this revenue given that these are sunset industries but they should pay a fair price and the tax and royalties should be paid to the tangata whenua to honour Te Tiriti

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

Agree

Why?

Every one will agree with this but what does it mean. We support fairness to future generations, the environment and meeting our Te Tiriti obligations. The concept of “reasonable” is also highly debatable and undefined. It has not been “reasonable” to regulate in favour of mineral extraction without recognising tangata whenua rights, community concerns and the long term health of the natural world so we are uncomfortable with this undefined terminology

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

Disagree

Why?

Obviously there is a natural justice issue to consider but we also need to consider the impacts of current operation from a climate change impact perspective, because knowledge of these effects has advanced since many permits were issued. So permits and consent conditions need to be reviewed in view of the current climate and

biodiversity crises.. Existing and consents may need modification in the current context e.g. continued drilling in rare frog habitat should be stopped either via review of permit or DOC agreements..

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.

Strongly disagree

Why?

This principle assumes that petroleum and minerals mining are part of our future in a positive sense. We need a clear and absolute commitment to Just Transition for these industries . The best scientific evidence is that we have to move away from this dependency on oil and minerals extraction to urban waste mining and renewables,

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

Strongly agree

Why?

Again however, this is highly rhetorical and given past history we need to see what the Crown thinks it means by these commitments. Honouring Te o Waitangi article in terms of negotiating with hapū would be a start., as they are not “ stakeholders”. Also the history of engagement has been a history of failure to listen and a reduction in public participation whether its block offers, permit processes and consents under the RMA, communities and NGOs have not been included in any of the decision making - how will this change?

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

Principle: Pursue continuous improvements in health and safety.

Strongly agree

Why?

The mining industry has a tragic history in terms of workers health and safety. Everyone should be safe at work and this is a top priority.

Principle: Strive to implement industry best practice in operations.

Disagree

Why?

We are not convinced by “ industry best practice” , as industry best practice is developed within a framework of resource exploitation and dumping of toxic externalities that we do not accept,

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

Disagree

Why?

This is a “ business as usual” principle, as we have stated these are sunset industries .
If we want to reduce impacts we need to start mining waste not mountains.

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

Disagree

Why?

This is pretty meaningless, how might this occur? and if stakeholders are powerless to veto mining activity and just allowed to talk about “ managing impacts” of tailings dumps , we are not better off. Also we have no redress unless its written into permits and consents and supported by strong independent monitoring. The history has not been good and we do not trust these statements as useful, practical or in line with our vision for a sustainable future.

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

The Strategy principles need to be based on the changes we must face society in climate crisis so the first principle should be - lead the transition from petroleum and energy intensive extractive mining activity.

Action areas intro

Action Area: Modernising the Crown Minerals Act

Strongly agree

Why?

The purpose of the Act is hugely problematic, it is not the Government ‘s job to facilitate mining but to regulate it. There are numerous flow on effects from the inappropriate purpose. This is not s submission on the CMA bit we consider it needs a total re write with particular attention to extending Schedule 4 over all Doc Land, changing the

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

Modernisation must mean in the light of climate change threats and the biodiversity crisis. The Act must be re drafted for genuine Te Tiriti based power sharing and public participation as well as changes to the permit system which is currently reflecting the Act’s totally inappropriate purpose.

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

Disagree

Why?

This is not a good action area, we need to be securing alternatives to petroleum and mining waste not the environment for our future.

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

None

Action Area: Improving Treaty partnership

Strongly agree

Why?

This needs unpacking. Te Tiriti relationships with hapū are not a “ partnership” and how does this Strategy intend to improve relationships.? Tangata whenua should be asked to define this principle.

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

Support Te Tiriti based constitutional change, reconsider the ownership of petroleum and minerals issues,, ensure hapū veto over proposed minerals developments

Action Area: Improving stakeholder and community engagement

Strongly agree

Why?

Yes but for what purpose? Just Transition or business as usual with the consultation box ticked?

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

Change your vision, explain the the minerals industry that the Crown cannot continue facilitating their activities except via urban mining, take Te Tiriti issues and environmental concerns to heart and listen to people with a long term view of the environment and biodiversity, not a vested interest in extraction for profit.

Action Area: Improving industry compliance

Strongly agree

Why?

This is a given in any industry.

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

As I said earlier, change structures to ensure independent monitoring and change the CMA to ensure a different purpose, the compliance flows from precautionary approach by Government.

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

Strongly disagree

Why?

If this means to continue extraction from the environment we reiterate a need for a Just Transition plan , and a timeframe for implementationi

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

We want a new mining model, based on reuse of minerals, job creation from extraction from waste sources with e waste as a top priority. This is well underway in other countries and the Government should be learning from others and fostering this approach immediately.

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

Change focus, lead in the context on the twin crises, be brave enough to act for genuine Just Transition by 2030

Other

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

Its disappointing to see such contradictory language in this document. Its starts with the rhetoric of sustainability and then implies business as usual which is not sustainable. The petroleum and minerals industries need help from Government to clean energy development and urban mining. This strategy tries to imply we can continue these damaging activities and be sustainable and that change is not urgent, Our organisation, with 40 years experience with mining companies, the law and mining effects rejects these assumptions and calls for a clear strategy which recognises the centrality of climate risks and biodiversity collapse, not tokenism. This document fails its Te Tiriti obligations and shows a lack of understanding of what is required in negotiation with hapū and iwi. Coromandel Watchdog of Hauraki calls for a vision reflective of our actual ecological circumstances and a sense of urgency on Just Transition issues. We know that the CMA must be changed to reflect the twin crises in climate and environment and that communities connected to oil and mining need a Just Transition to sustainable work for a healthy future. We are ready to support that kind of strategy, but not this weak attempt to placate a range of interests while continuing to support these industries. We, and many others are leading in the defence of our natural resources from unnecessary exploitation and we would welcome a Strategy that supported our efforts for future generations.

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

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Can we include your business name or organisation?

Yes

Can we include your position title?

Yes

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

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