

Introduction

Name:

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Email:

Privacy of natural persons

Business name or organisation (if applicable):

Coal Action Network Aotearoa

Position title (if applicable):

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?

There needs to be a clear and explicit plan to phase out fossil fuels. They need to be differentiated from other minerals, and it should be acknowledged that they will be phased out, within a just transition. As it stands the bill implies coal will carry on being mined for the foreseeable future; which is not compatible with the climate crisis or other legislation such as the Zero Carbon Bill, nor international agreements.

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

We need to begin preparing for a decarbonized future. Fossil fuels should be used only as a precious and finite natural resource, used to set up the infrastructure required in order to live without them. It is absolutely clear we cannot continue frivolously using them the way we are currently. This bill needs to recognise that phaseout. There also needs to be recognition of a just transition, as seen in many successful overseas examples (notably Bottrop, Germany).

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

This is a completely irresponsible question in the current context of the climate crisis. In the shift to a wellbeing economy, it must be recognized that the environmental, social, cultural (and long term economic) damage from mining fossil fuels is far greater than any economic value.

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”.

Disagree

Why?

(b) should be the first, primary objective; not 'responsibly delivers value.' We need to move beyond worshipping economics. 'Supporting New Zealand's transition to a carbon neutral economy' is a good objective but is not evident in the rest of the Strategy.hroughout the

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

Disagree

Why?

A productive sector, in relation to coal, is again absolutely irresponsible. We can (and must) be innovative beyond continuing a reliance on fossil fuels.

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

Disagree

Why?

This could mean anything. The document states that: “The regulatory system balances impacts across the four capitals to ensure that mining activity contributes to wellbeing.” It is difficult to understand this concept; again a long term view would indicate that mining activity (at least in terms of fossil fuels) will be extremely detrimental to wellbeing.

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

A Just Transition, and a carefully managed phaseout of fossil fuels.

Guiding principles

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

Strongly agree

Why?

If we don't, we are a suicidal species. This should go beyond "respected," which is too ambiguous, and instead be changed to "protected."

Principle: Māori cultural interests are understood and respected.

Strongly agree

Why?

To respect Te Tiriti, to have a healthy co-operative society, and to take guidance from Tikanga.

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

Strongly agree

Why?

We would prefer 2040 for carbon neutrality. Still, the important thing is that we simply begin rapidly moving in that direction. The next decade will define the conditions we live in for hundreds of years.

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

Strongly agree

Why?

Because that is your role as government.

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

Strongly agree

Why?

We know the take, use, throw away model is nonsensical and very damaging environmentally. A circular economy is clearly necessary for a sustainable future.

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?

As it currently stands, the CMA conflicts with the proposed ZCB and the Paris Agreement. This will need to be rectified to avoid mass confusion in decision-making.

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.

Strongly agree

Why?

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

Neither agree nor disagree

Why?

The important point is that coal and petroleum are phased out.

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

Strongly agree

Why?

We need much greater transparency on coal use in NZ. It currently takes expensive and lengthy OIA requests to find out this information, whereas it should be accessible to anyone interested- after all, some of these activities have huge repercussions for communities in terms of both local air quality and climate breakdown.

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

Agree

Why?

Agree, although coal and oil permits should not be renewed, and the Crown should work with the permit holders to manage a just transition.

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.

Neither agree nor disagree

Why?

There is a conflict within the question: The best evidence speaks strongly of a climate and ecological emergency; that we are dangerously living beyond planetary boundaries, with absolutely enormous repercussions. This is not conducive to a "foreseeable need for minerals and petroleum." It is more complicated than that, with some minerals being necessary to build renewable infrastructure, some that could be limited through a (as previously mentioned) circular economy, and fossil fuels needing to be phased out. The "evidence" and the "needs" must be carefully weighed up – simply agreeing or disagreeing is too simplistic. At the end of the day, our energy systems need to change. This will not be easy or straightforward. However, looking at the bigger picture, climate breakdown due to not transitioning will be far, far more disruptive.

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

Agree

Why?

The Crown must engage with stakeholders and communicate transparently, but at the same time, there is a lot dependant on who the Crown deems relevant, and who is listened to the most. There might be liaising with mining companies- but these activities also affect people on disappearing Pacific Islands, farmers who suffer climate-change induced droughts and floods, children who will never see critically endangered species endemic to mining-consented areas such as the Avatar moth and Archey's frog. Obviously, you cannot engage with everyone, but ethical responsibilities must be considered, as decision makers with global and far-reaching impacts. Further, it must be factored into account that the relevant businesses have the time and resources to present polished arguments, whereas others who are affected are engaging on a voluntary and time-limited basis- if they are engaged at all.

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

Principle: Pursue continuous improvements in health and safety.

Strongly agree

Why?

Principle: Strive to implement industry best practice in operations.

Strongly agree

Why?

Although in terms of fossil fuels, best practise is not an adequate substitute for phase out.

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

Agree

Why?

Yes, but needs to be combined with a phase out of fossil fuels.

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

Agree

Why?

Yes, but needs to be combined with a phase out of fossil fuels.

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

A just transition away form fossil fuels.

Action areas intro

Action Area: Modernising the Crown Minerals Act

Agree

Why?

The old CMA is very outdated, and the proposed one is a little better but should be 'modernized' more adequately to reflect the climate crisis.

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

More acknowledgement of the climate crisis and the need for fast decarbonization.

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

Disagree

Why?

The point "Better understanding our gas supply for energy security" should be acknowledged within the context of the 'carbon bubble' - <https://www.carbontracker.org/terms/carbon-bubble/>

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

The reality of the carbon bubble

Action Area: Improving Treaty partnership

Strongly agree

Why?

Beucause it is the decent thing to do!

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

Action Area: Improving stakeholder and community engagement

Agree

Why?

As I said above, efforts must be made in terms of who is engaged with and who is listened to, for a fair outcome.

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

Action Area: Improving industry compliance

Strongly agree

Why?

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

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

Agree

Why?

It must be considered that there is an absolute trove of research into the implications of burning fossil fuels, yet there is no real plan in this CMA to phase them out- there is no point investing in research if it is subsequently ignored. The specified current action is "plan for a circular economy"- this is great but would be good to see more detail on how this will work in practise.

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

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”?

1. We have been engaging in this process for months, putting time into feedback on previous drafts. It is disappointing that the Strategy does not appear to reflect any of our point of view (which is similarly shared by the overwhelming majority of New Zealanders very concerned about climate change). It is very, very alarming that the Strategy has no real plan to phase out fossil fuels- indeed not even differentiating between petroleum and minerals. A forward thinking, rational approach would be to begin immediately planning a phase out and a just transition for miners. To advocate for the continued extraction of coal, in the current climate crisis, is completely inadequate and ignores your duty as public servants protecting the interests of New Zealanders. We strongly advise for changes to at the very least acknowledge the phase out of coal before the Strategy is finalized.

2. Gas is not a suitable transition fuel- investing more in gas will lock in more fossil fuel infrastructure that will last decades. Gas also leaks significant amounts of methane. NZ is a mecca of renewable energy and we should be pushing these projects; not locking in more fossil fuel infrastructure.

3. There should be no new coal mines or oil and gas wells. The remaining petroleum resources should be used carefully, for building necessary infrastructure.

4. Hon. Megan Woods states in the introduction that we need to use “significantly less

fossil fuels such as coal and petroleum.” However, throughout the rest of the Strategy the only mentions of coal are descriptive, or state that we need it. (e.g. p. 20 states that “fossil fuels (coal, petroleum, and gas) will continue to play a role in providing secure, affordable energy to New Zealand over the medium term. Fossil fuels will be phased out carefully over time.” This is completely misaligned with physics, international agreements, and the incoming Zero Carbon Bill. The IPCC’s 1.5 report, from the world’s top climate scientists, said that we have twelve years (now eleven) to be significantly on the way to decarbonisation, or there will be catastrophic impacts. Phasing out coal is not a long term goal- it needs to begin immediately; and it needs to be a primary goal of this Strategy.

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

Use and release of information

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Yes

Can we include your name?

Yes

Can we include your email address?

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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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