

# Summary of Submissions on Draft Minerals Strategy to 2040

SEPTEMBER 2024



## **Ministry of Business, Innovation and Employment (MBIE) Hīkina Whakatutuki – Lifting to make successful**

MBIE develops and delivers policy, services, advice and regulation to support economic growth and the prosperity and wellbeing of New Zealanders.

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**ONLINE: ISBN 978-1-991316-21-9**

**SEPTEMBER 2024**

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## Summary

This document provides a summary of submissions on the draft Minerals Strategy to 2040 (the strategy). Consultation on the strategy started on 23 May and closed on 31 July 2024. Thank you to those who took the time to provide a submission. Your insights and input will help us establish a long-term strategic approach to ensure that resource development for our economic prosperity happens in a responsible manner.

For this report, we have used the following quantifiers to indicate the strength of themes:

Table 1: Methodology for indicating strength of themes

Quantifier	Approximate number of submitters
Few	Fewer than 5% of submitters on this topic
Some	5 to 25% of submitters on this topic
Many	25 to 50% of submitters on this topic
Most	50% - 90%
Almost all	90% or more
All	100%

There were 102 submissions from a range of submitters. The majority of the submissions came from individuals, consultants, and business owners (28% of submissions), minerals industry participants or groups/bodies (21%), and environmental and community groups (16%). 96% of submitters are broadly supportive of developing a plan to manage the future of mining in New Zealand with various forms of suggested changes, while 4% did not support the strategy in its entirety.

Six central themes were distilled from the submissions:

- environmental concerns/protection and stewardship (26%)
- honouring Te Tiriti o Waitangi/The Treaty of Waitangi and Māori Partnership (25%)
- economic considerations/development and social responsibility (20%)
- building social license and improving public perception on mining (11%)
- regulatory and procedural improvements/strategic framework (10%)
- innovation, research, circular economy, and recycling (8%)

We are currently using the insights from submissions to revise the strategy. Once revised, the strategy will be presented to Cabinet and will be finalised before the end of the year.

## Methodology for submission analysis

The consultation document posed five key questions to help submitters focus their response to specific points of interest. These questions were:

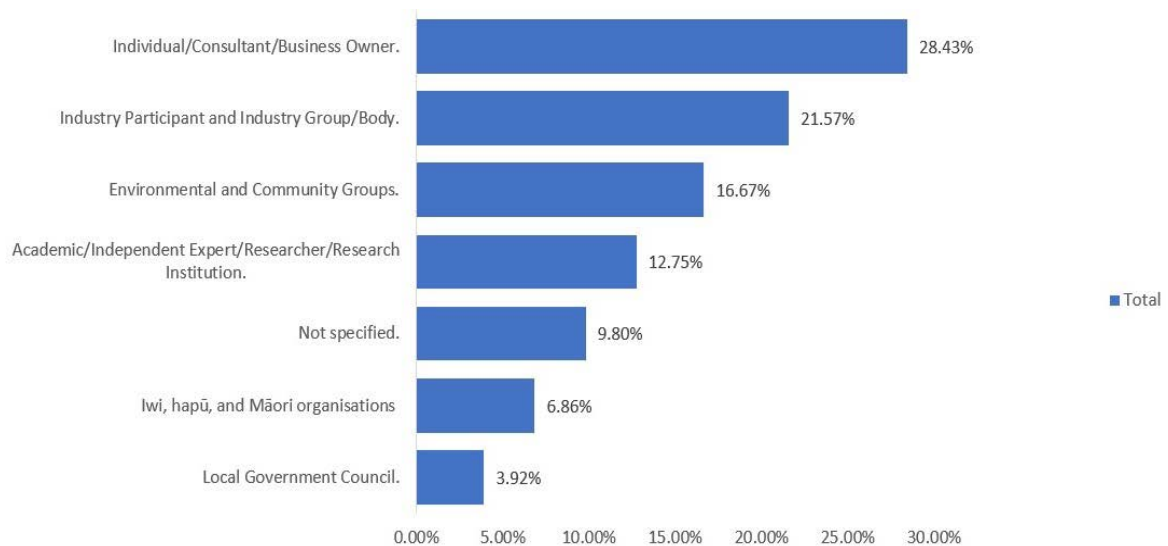
1. Are the strategic pillars of the Draft Strategy (Enhancing prosperity for New Zealanders, Demonstrating the sector's value, and Delivering minerals for a clean energy transition) suitable or is there more we need to consider?
2. Are the key actions the right ones to deliver on our strategic pillars, and are they ambitious enough?
3. Are there opportunities for our minerals sector we haven't considered?
4. Are there challenges for our minerals sector we haven't considered?
5. Are there any other things we have missed that we should include, or things we should not include?

The project team reviewed all submissions to identify and collate themes using a mix of qualitative and quantitative approaches. The qualitative approach involved reading all submissions to identify the broad, most recurring, and less recurring themes from submissions. The quantitative approach involved data curation to make the submissions data easily accessible and quantifiable according to themes and spread of submitters. This process enabled the project team to understand the overall level of support from submitters and group themes into a number of categories. Internal reviews ensured consistency and accuracy of the submissions analysis and summary.

### Who we heard from

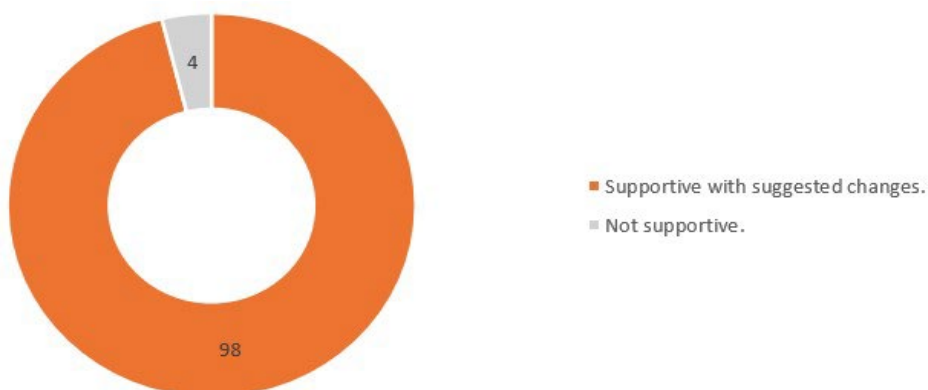
We received a total of 102 submissions from a range of submitters. The categories of submitters are summarised in **Figure 1**. 9.8% of submitters did not specify their roles or preferred not to say.

**Figure 1: Spread of submitters**



### What we heard from submitters

**Figure 2: Overall support for the strategy**



#### Individuals, consultants, and business owners

Individuals, consultants, and business owners supported the strategy but with various levels of suggested changes. Most submitters in this category suggested the exclusion of coal,

seabed mining and the Fast Track Approvals Bill due to environmental factors. They suggested greater emphasis on environmental protection and managing the trade-offs of mining, improving the evidence base for the economic projections and targets in the strategy, and greater involvement of the public and iwi and hapū to honour the Crown's obligations under Te Tiriti o Waitangi/The Treaty of Waitangi. A number of submitters also argued for more ambitious export target and increased revenue to the Crown through a suitable tax per centage, and ensuring direct economic benefits from minerals get to New Zealanders instead of offshoring profits through overseas owned mining companies.

### Industry participants and industry groups/bodies

Industry participants largely supported the strategy, including actions around environmental protection and responsible mining and building social licence for mining, and also suggested a more ambitious export target. A number of industry participants also suggested the strategy should emphasise Māori interests in mining and the contribution of Māori to the industry.

Mining industry body Straterra called for cross-party support for the strategy. Some of the key points of their submission included clarifying the goal of the strategy for easy measurement of success, including what modern mining in New Zealand entails, and acknowledging the efforts of the industry to reduce environmental impacts. They supported the existing prohibitions on Schedule 4 land. Straterra also supported the Fast Track Approvals Bill to accelerate the development of regional and national significant projects, including mining projects, and suggested increased allocation of government science funding into research and development towards minerals opportunities, extraction, and processing. Additional points by Straterra included enhancing regulatory certainty to attract international mineral investors to New Zealand, and the development of a workforce strategy for the minerals sector to retain and attract skilled labour force.

Industry participants supported the points raised by Straterra and emphasised the need for government efforts to build social license through information sharing to correct misconceptions and negative perceptions about mining.

The Aggregate and Quarry Association (AQA) broadly supported the strategy but echoed points of other industry bodies and submitters around delivering value in an environmentally and socially responsible way. The AQA also suggested simplifying and streamlining planning processes to ensure the supply of aggregates and ensuring environmental remediation after quarrying.

Business New Zealand Energy Council (BEC) called for improved data quality and data collation on minerals as data is currently fragmented, clarity of targets around jobs and doubling export value, and the evidence base for the targets. BEC also echoed the point about being more ambitious on doubling export value and having a dedicated strategic pillar on building social license. They emphasised government-industry collaboration to demonstrate New Zealand's robust safeguards and strengthen the social license of mining.

Fishing industry bodies – the New Zealand Rock Lobster Industry Council and the Pāua Industry Council – broadly supported the strategy but recommended a good balance of the trade-offs between economic benefits and environmental impacts, ensuring the sustainability of natural resources, and respecting existing property rights. They suggested including onshore fisheries rights holders in the Fast Track Approvals Bill process, and effectively managing the impacts of mining on fisheries and the marine ecosystem generally.

## Environmental and community groups

The overarching themes of environmental and community groups included adopting a holistic view of prosperity which considers both the economic and environmental angles, ensuring New Zealand's self-sufficiency and resilience against supply risks, and ensuring robust measures for decommissioning and environmental remediation to avoid another Tui oil field scenario where the Crown assumed liability for decommissioning costing taxpayers \$343 million. They also suggested the exclusion of coal, seabed mining and the Fast Track Approvals Bill due to environmental factors and the need for proper democratic process and public participation in the decision making around these matters. These views were consistent with submissions from academics, independent experts, researchers, and research institutions.

The Parliamentary Commissioner for the Environment (PCE) broadly supported the strategy but suggested having a dedicated pillar on minimising environmental impacts and translating the high-level environmental aspirations in the strategy into specific actions. Other key themes of the PCE's submission included undertaking full life cycle assessment of mining impacts, reviewing the existing royalty regime to ensure fair share of economic value of mining, and ensuring decommissioning and environmental remediation of contaminated sites to avoid externalising costs to New Zealand taxpayers and the Crown. Regarding the inclusion of the Fast Track Approvals Bill, the PCE suggested considering how pro-mining initiatives interact with the watering down of environmental protections through the Bill and the Resource Management (Freshwater and Other Matters) Amendment Bill.

The Environmental Defence Society (EDDS) supported actions to improve minerals data and use of technology and innovation, including re-use and recycling technologies. However, it said coal mining conflicts with the environmental outcomes stated in the strategy and New Zealand's climate change commitments. The EDS said the strategy needs to consider environmental protection, indigenous biodiversity, freshwater, and landscape, and that mining needs to occur at the right scale and right place. Another key point in their submission is to undertake annual benchmarking of mining against environmental degradation and benchmarking against environmental net benefits to communities where mining occurs.

## Iwi, hapū, and Māori organisations

Submissions by iwi, hapu, and Māori organisations are largely consistent and centre around Te Tiriti o Waitangi/The Treaty of Waitangi and Māori partnership, environmental protection and stewardship, economic development and social responsibility, and regulatory and procedural improvements. These themes have been discussed in a dedicated section below.

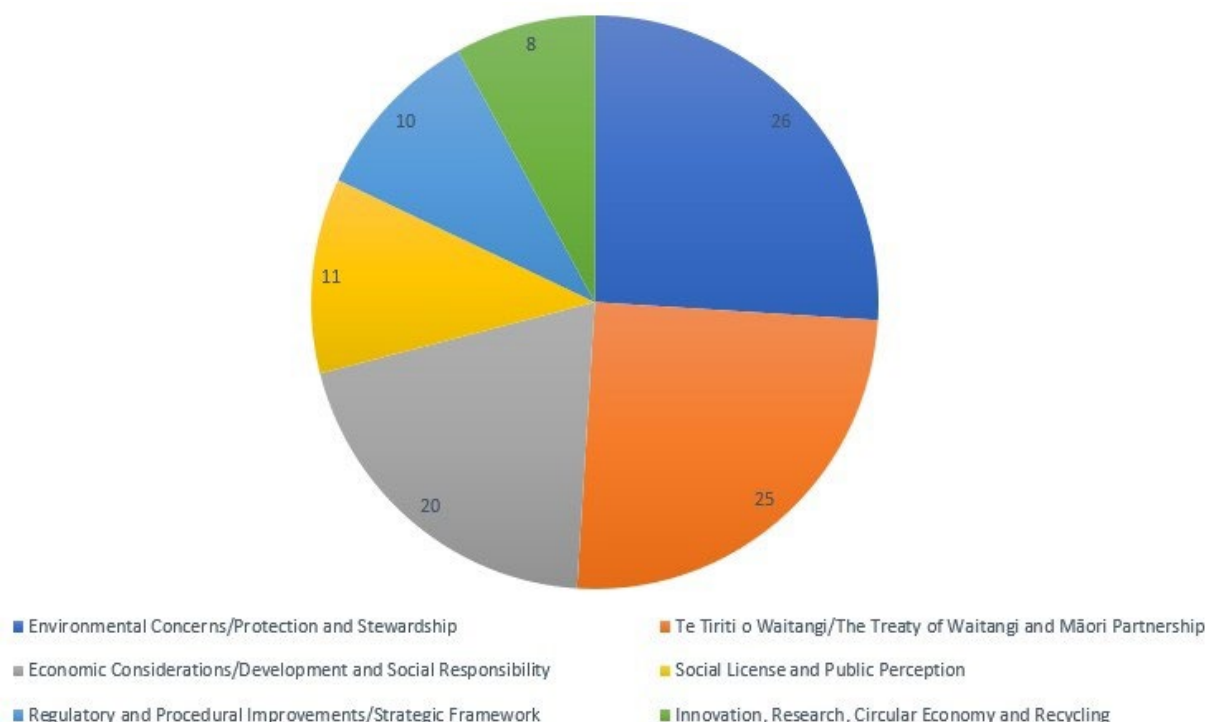
## Local Government Councils

Submission from local government came from four councils – Tasman District Council, Western Bay of Plenty District Council, West Coast Regional Council, and Dunedin City Council. These councils broadly supported the strategy with suggested changes, including having a dedicated strategic pillar for environmental protection and responsible mineral production covering a comprehensive management approach to climate change, commitment to Te Tiriti o Waitangi/The Treaty of Waitangi obligations and Māori involvement, and building social licence. Other suggestions were about ensuring clarity of the strategic pillars and strengthening the actions, including a strong emphasis on circular economy of minerals with improved data collection and analysis of current waste stream to identify opportunities to recover precious metals for re-use, and ongoing monitoring to track progress.

## Six central themes emerged from submissions

Submitters who supported the strategy with suggested changes provided constructive feedback and insights which, overall, advocate for a strategic approach that balances economic growth with a commitment to environmental sustainability, social responsibility, long-term resilience, honouring Te Tiriti o Waitangi/The Treaty of Waitangi obligations and respecting the wishes of Māori with respect to minerals. The insights were categorised into the following six central themes with sub-themes.

Figure 3: Final distribution of key themes by per centage



### *Environmental concerns/protection and stewardship*

Many submitters supported the need to ensure environmental protection and long-term environmental sustainability. The overarching message around this theme is to include a dedicated strategic pillar in the strategy to manage environmental risks. Sub-themes include:

- Emphasis on assessing and mitigating environmental risks.
- Opposition of mining on conservation land, seabed mining, new coal extraction, the Fast Track Approvals Bill, and current Resource Management Act reforms due to environmental concerns.
- Consideration of the full lifecycle impacts of mining, including waste management and site remediation.
- Focus on minerals supporting a low-carbon future while avoiding fossil fuels.

### *Honouring Te Tiriti o Waitangi/The Treaty of Waitangi and Māori Partnership*

Many submitters observed there was lack of proper engagement and involvement of Māori in the development of the strategy and emphasised the need to uphold Te Tiriti o Waitangi/The Treaty of Waitangi obligations and give it prominence in the strategy. They also suggested

meaningful engagement and involvement of Māori in the implementation of the strategy while building a robust Māori-Crown relationship as Treaty Partners. A number of submitters also suggested for the strategy to have a dedicated strategic pillar on working with Māori and respecting Te Tiriti o Waitangi/The Treaty of Waitangi principles. A less dominant theme under this category is the ethical issue of not contributing to the global supply of minerals but benefiting from products with mineral inputs. Sub-themes include:

- Honouring Te Tiriti o Waitangi/The Treaty of Waitangi obligations and meaningful engagement of Māori.
- Respecting treaty settlements and Māori views on land use and seabed mining.
- Greater involvement of Māori.
- Addressing the ethical dilemma of opposing domestic mining while relying on products that include minerals which could be sourced domestically.

#### *Economic considerations/development and social responsibility*

Submitters were unified in their feedback on the need to balance the trade-offs between economic development/prosperity and managing the social impacts associated with mining, especially in the regions where mining occurs. A number of submitters who advocated for responsible economic development also suggested setting more ambitious targets for the Crown and New Zealanders to derive optimal economic benefits from minerals while also enabling and attracting investments. Sub-themes include:

- Balancing economic benefits with social impacts.
- More ambitious economic targets.
- Enhancing tax and royalty regimes to ensure fair value for New Zealand.
- Attracting foreign investment and promoting domestic processing and value addition.
- Value addition, including minerals processing and product manufacturing.

#### *Building social license and improving public perception on mining*

Many submitters discussed social license, public perception on mining, and workforce development. They recommended more direct involvement of the Government to build social licence and providing relevant material to educate New Zealanders to have an informed perception about mining. Submitters also emphasised the need to develop a skilled workforce with relevant technical capabilities to support the mining sector. Ideas included collaboration with universities and research institutes to establish and maintain relevant programmes, including attracting international skilled migrants. Key themes include:

- Addressing misconceptions and negative public perceptions about mining.
- Ensuring transparent, informed debate on the role of the minerals sector in New Zealand.
- Active participation of Government and industry to build social license for mining.
- Mining companies environmental responsibility and practices key to building social license.



- Incentives and programmes for mining workforce development.

### *Regulatory and procedural improvements/strategic framework*

Many submitters proposed improvements to the regulatory and governance arrangements for mining to ensure certainty and efficiency, and to attract and retain investments in the New Zealand mining sector. A number of submitters suggested a coherent policy statement and realignment of the strategic pillars with other strategies and policies of the Government, such as the Emissions Reduction Plan, and broader strategic issues such as sustainable development, environmental risk management, and socio-economic. Sub themes include:

- Ensuring regulatory certainty and efficiency improvements in the existing framework.
- Avoiding prioritization of critical minerals at the expense of broader environmental and social values.
- Integrating the minerals strategy with other strategies and plans such as the Emissions Reduction Plan.

### *Innovation, Research, and Circular Economy*

The majority of submitters supported the deployment of technological innovation across the entire chain of minerals extraction, processing, value addition and distribution. Almost all submitters who advocated for technological innovation also emphasised a stronger focus on scientific research, circular economy, re-use, and recycling of extracted minerals, including recovery of minerals from e-waste. Sub-themes include:

- Emphasizing research and development in sustainable mining practices and technologies.
- Promoting recycling, reuse, and recovery of minerals to support a circular economy.
- Working closely with the science community, universities, and research institutes.
- Establishing a hub for independent research and advice on minerals.

## **What we heard specifically from iwi, hapū and Māori organisations**

We heard from seven iwi, hapu, and Māori organisations. Five supported the strategy with suggested changes, and two opposed the strategy due to concerns around not honouring Te Tiriti o Waitangi/The Treaty of Waitangi principles and lack of meaningful engagement and involvement of Māori in the development of the strategy. Submissions by iwi, hapu, and Māori organisations are largely consistent with many other submissions and have been summarised into four broad themes:

### ***Te Tiriti o Waitangi/The Treaty of Waitangi and Māori Partnership***

- Including direct reference and reflecting genuine partnership to upholding Te Tiriti o Waitangi/The Treaty of Waitangi in the strategic pillars and actions.
- Giving appropriate weight to the interest of Māori as Treaty partners.
- Acknowledging Māori ownership or statutory acknowledgment over land where minerals are located.
- Granting Māori decision-making authority and veto rights over mining activities.

- Meaningful engagement and partnership with Māori needed.
- Inclusion and participation of Māori in any development or infrastructure opportunities.

### ***Environmental Protection and Stewardship***

- Committing to responsible environmental management at all times, including balancing mineral opportunities with the health and vitality of the environment.
- Including an additional strategic pillar on environmental protection.
- Articulating acceptable level of environmental interruption and mitigation mechanisms.
- Including robust environmental rehabilitation plans into regulatory frameworks.
- Dropping the Fast Track Approvals Bill as it is not compliant with Te Tiriti o Waitangi.
- Dropping the RMA Amendments as it undermines crucial environmental safeguards.
- Prioritize environmental protection, including providing stringent environmental regulation, monitoring, and accountability for developers.
- Protecting minerals of cultural importance such as pounamu, matā, pākohe, and pūrangi.
- Dropping seabed mining.
- Dropping coal expansion and promotion as it undermines climate science and climate commitments.

### ***Economic Development and Social Responsibility***

- Ensuring sustainable investment and long-term economic resilience.
- Investing and redistributing Crown Royalties directly back into the regions.
- Considering just transition plan for the workforce and linking with regional partnership.
- Long-term investment in social license.
- Supports circular economy and the approach of mineral recovery, re-use, and recycling technologies.
- Encouraging the increase in local workforces through employment, training, and contract for services.
- Considering a growing a productive, sustainable, and inclusive economy.
- Considering social responsibility and socially responsible mining.
- The Critical Minerals List should identify and prioritize minerals which will contribute to the wellbeing of all New Zealanders.
- Measuring contribution of minerals to our collective wellbeing using the Treasury's Living Standards Framework.

### ***Regulatory and Procedural Improvements***

- Providing more clarity, details, and evidence base in the strategy.
- Improving consenting processes.
- Properly defining the strategic pillars and actions.
- Ensuring regulatory efficiency and improvements.
- Responsible and democratic regulatory reform.
- Undertaking minerals stocktake.

### **Next steps**

The Ministry of Business, Innovation and Employment are currently using the submissions to help inform revisions to the strategy. Once revised, the strategy will be presented to Cabinet and will be finalised before the end of the year.



**Te Kāwanatanga o Aotearoa**  
New Zealand Government

MBIE 11376