

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

Name:

Privacy of natural persons

Email address:

Privacy of natural persons

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:

D. The best way to describe your role is:

Academic/researcher

Independent expert (please specify below)

Consultant (please specify below)

Business owner (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:

Parent of a child who will have to live with the destructive consequences of this Draft Minerals Strategy

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 Minerals Strategy for New Zealand to 2040

MBIE is developing a *Minerals Strategy for New Zealand to 2040* to enable us to take a long-term, strategic approach to how we develop our mineral resources. This does not include petroleum which already has an advanced regulatory regime.

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 will continue to play a major role in New Zealand's export-led economic growth and contribute to our economic functions, but the minerals sector faces some risks and challenges. These include lack of complete understanding about our minerals ecosystem, supply risks, social license, and a regulatory system that needs to be improved to enable investments.

These challenges require a long-term strategic approach to ensure that resource development for our economic prosperity happens in a responsible manner. Developing a minerals strategy is a fundamental first step in ensuring that we have a strategic framework for resource production.

The Minerals Strategy Discussion Document seeks feedback on the context and design of the strategy. It discusses key strategic issues, challenges and opportunities facing the minerals sector in New Zealand, and how we could address them.

The strategy is built on three key pillars, **Enhancing prosperity for New Zealanders**, **Demonstrating the sector's value**, and **Delivering minerals for a clean energy transition**, and identifies specific actions the Government could take to position the minerals sector to deliver value in an environmentally responsible manner.

Please see the Minerals Strategy Discussion Document for more information.

Questions for the consultation

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?

Yes, they are suitable No, they are not suitable Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice? Or is there more we need to consider?

The mineral extraction industry does not need cheerleading; it needs regulation. The pillars should reflect this.

Demonstrating the sector's value

The proposed pillars prioritise short-term profit over the severe and wide-ranging social and environmental risks of increasing mining in Aotearoa New Zealand. These include:

- Toxic tailings
- Polluted waterways
- Habitat destruction
- Biodiversity loss

- Greenhouse gas emissions associated both with mining itself and with the burning of any coal that is dug up
- Health and safety risks to both workers and communities
- The social cost of locking communities into dying industries like coal
- The opportunity cost of not providing realistic options for a just transition away from dependence on coal

These negative impacts must be weighed when determining “the sector’s value”. I suggest replacing the pillar about demonstrating value with a pillar that is specifically about managing risks. Decisions must use an evidence-based framework for ensuring that the economic benefits truly outweigh the risks before a project is permitted to go ahead. This pillar should focus on evaluating risk to various stakeholders before taking on a project, giving it the same priority as assessing the economic value of a project. This would create a more balanced strategy that at least mitigates the negative impacts.

Delivering minerals for a clean energy transition

The pillar “Delivering minerals for a clean energy transition” sounds good in theory, but rings rather hollow when one discovers that a large proportion of the “minerals” referred to in the strategy are coal. I agree that the minerals that we allow should be those that help us towards a clean energy transition, and more specifically, toward a zero carbon future. Coal is absolutely not one of these minerals. Coal is a dying industry that we must transition away, not towards. As well as being an unacceptable source of climate-destroying greenhouse gases, coal is not even a good economic prospect anymore, as renewables are now cheaper. Allowing coal extraction now is deeply irresponsible, both environmentally and economically. I urge you to amend the minerals strategy to categorically rule out any coal mining.

As for minerals which may actually assist in the energy transition, this alone should not give them an automatic ‘green light’ without careful due diligence that provides conclusive scientific evidence of their necessity and that their value outweighs the known negative impacts of mining.

2. Are the key actions the right ones to deliver on our strategic pillars, and are they ambitious enough?

- Yes, the actions are the right ones and are ambitious enough
 No, the actions are not the right ones ~~and not ambitious enough~~
 Not sure/no preference

If **No**, what else might we need to consider?

First, I wish to object to the answer options provided for this question, which are biased and leading. I do not think the actions are the right ones, but not because they are not “ambitious” enough. I think the actions do not achieve the strategic pillars of enhancing the prosperity of New Zealanders or supporting a clean energy transition.

I am strongly opposed to the Fast-track Approvals Bill, which undermines democracy while overriding environmental protections that are necessary for our survival and the future of our children. By concentrating decision-making power in the hands of just three ministers, it opens our country up to corruption and environmental destruction. The Fast-track Approvals Bill is in no way necessary for a safe, productive, high-value minerals sector.

I am strongly opposed to the continuation or expansion of coal mining, which is a major cause of the climate crisis. The overwhelming scientific consensus is clear: there is no place for coal in the clean energy transition. We need to stop all existing coal mining, and we absolutely must not open any new coal mines.

I also oppose seabed mining within New Zealand territorial waters and beyond. Since 2022, the New Zealand Government has supported the moratorium on deep sea mining in areas beyond national jurisdiction, recognising the need for adequate knowledge and understanding of the impacts involved. This is commendable, and the moratorium must continue. We rely on the ocean for our continued survival. The ocean is our world’s largest carbon sink, absorbing a quarter of all CO2 emissions and 90% of the excess heat generated by those emissions. However, our oceans are at breaking point. Marine biodiversity loss, plastic pollution, warming waters, ocean acidification (due to excess CO2 absorption), cruise ships, and shipping are all wrecking the ocean and its ability to protect us from the worst impacts of climate change. Seabed mining is known to massively damage marine ecosystems; it will further devastate the ocean and interfere with its ability to sequester carbon. Aotearoa New Zealand must start working to restore ocean health, not further damage it with destructive practices like seabed mining.

3. Are there opportunities for our minerals sector we haven’t considered?

- Yes, there are No, there are none Not sure/no preference

If **Yes**, what are the opportunities for our minerals sectors we should consider?

- Commit to no new coal mines.
- Implement strong, evidence-based frameworks for assessing whether to extract new materials based on (a) how they provide value to a modern, decarbonised world economy and (b) whether these benefits outweigh the many social and environmental risks involved.
- Be a global leader in environmentally and socially conscious mining practices, recycling of metals and minerals, and just transition away from coal mining to a clean energy future.

4. Are there challenges for our minerals sector we haven't considered?

- Yes, there are other challenges not considered
- No, all challenges have been considered
- Not sure/no preference

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

- Environmental challenges including (but not limited to) toxic tailings, polluted waterways, habitat destruction, biodiversity loss, and greenhouse gas emissions.
- Human health and safety risks to both workers and communities (including due to the polluted waterways, etc. mentioned above).
- Legal challenges
- Land ownership challenges

5. Are there any other things we have missed that we should include, or things we should not include?

These things could be economic/financial, environmental, health and safety related, or other areas.

The land and ocean are not merely resources to be exploited; they are what sustains all life on this planet. We must stop trying to extract short-term profit at the expense of our children's future. We must not lock our economy into reliance on mining, and especially not fossil fuel expansion in the form of new coal mines. Instead of exploiting finite natural resources to the detriment of our land, our ocean, our climate, and our people, we should seek income through high-value economies such as value-added products and IT. While some minerals will be necessary for the transition to renewables, these are far more limited than the proposed strategy suggests.

Aotearoa New Zealand has many opportunities to thrive economically that do not rely on our population being exposed to dangerous substances or our environment being polluted and destroyed. While there may be some cases in which it makes sense to mine minerals, again, these are far more limited than the proposed strategy suggests.

Finally, I urge you in the strongest possible terms to protect conservation lands from all mining. These lands have been legally recognised for their biodiversity values and ecosystem services; to mine them would be the grossest of irresponsible acts.

Thank you

Thanks for your feedback, we really appreciate your insight. It helps us establish a long-term strategic approach to ensure that resource development for our economic prosperity happens in a responsible manner.

To help us continue to develop a Minerals Strategy for New Zealand to 2040, we would appreciate any additional suggestions or comments you may have.

Please leave your feedback here:

Above all, I urge you to:

- Stop all existing coal mining and ban any future coal mining in Aotearoa New Zealand, while progressing a just transition for those currently reliant on this industry.
- Ban seabed mining.
- Ban any and all resource extraction on conservation land.
- Stop the Fast-track Approvals Bill, which is an attack on our democracy and our environment, and a threat to all sectors, including mining, because it opens up our workers and regions to be exploited by overseas corporations with no recourse for local communities.

A lasting and robust mineral strategy should not rely on anti-democratic legislation like the Fast-track Approvals Bill, nor the destruction of our climate, ocean, or conservation land.