

# Consultation submission form

## A Draft Minerals Strategy for New Zealand to 2040

MAY 2024

### How to submit using this form

This form is used to provide feedback on the draft Minerals Strategy for New Zealand to 2040.

When completing this submission form, please provide comments and reasons explaining your choices. Your feedback provides valuable information and informs decisions about the design of the strategy.

You can submit this form by 5pm, Wednesday, 31 July 2024 by:

- Email to [resourcesfeedback@mbie.govt.nz](mailto:resourcesfeedback@mbie.govt.nz) with subject line '**Minerals Strategy Consultation 2024**' and BCC [climateclubnz@substack.com](mailto:climateclubnz@substack.com) OR

- Mailing to:

**Minerals Strategy Consultation 2024**

Resource Markets Policy

Ministry of Business, Innovation and Employment

PO Box 1473

Wellington 6140

Your feedback will contribute to further development of a Minerals Strategy for New Zealand. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

## 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: Christopher Hawkins

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:

N/A

### D. The best way to describe your role is:

- |  |  |
|--|--|
| <input type="checkbox"/> Academic/researcher                         | <input type="checkbox"/> Independent expert (please specify below) |
| <input type="checkbox"/> Consultant (please specify below)           | <input type="checkbox"/> Business owner (please specify below)     |
| <input type="checkbox"/> Tradesperson (please specify below)         | <input type="checkbox"/> Student (please specify below)            |
| <input type="checkbox"/> Industry group (please specify below)       | <input type="checkbox"/> Other (please specify below)              |
| <input type="checkbox"/> Industry participant (please specify below) | <input type="checkbox"/> Prefer not to say                         |

Please specify here:

Student (Law)

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](http://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?

It's not acceptable that success in the pillar "Demonstrating the sector's value" merely compromised 'improved reporting' on net benefits. I seriously question whether it is possible to evaluate the 'net benefit' of destroying a unique and irreplaceable ecosystem on conservation land in order to mine it. These are things we cannot put a dollar value on.

Managing risks should be its own strategic pillar, and have the same priority as evaluating potential benefits.

Any minerals that we allow should be strictly directed towards enabling a zero carbon future. If we are to have any hope not to exceed planetary tipping points, the coal in the ground needs to stay there. Coal should absolutely not be part of any long term minerals strategy.

Minerals that could help facilitate the energy transition should still not receive automatic approval without careful due diligence that involves thorough scientific evaluation of the known negative impacts of mining in each given case.

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  
 Not sure/no preference

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

The answer options to this question are leading-answers that predicate that one might only disagree because they want this strategy to be “more ambitious” where that means supporting more extensive mining.

I disagree that the Fast-Track Approvals bill is necessary to demonstrate the sectors’s value, enhance the prosperity of New Zealanders or deliver a clean energy transition. We already have consenting processes in place and allowing just three MPs to make key decisions increases the chance that important information will be lost or ignored. I believe an environmentally sound, high-value minerals sector can be achieved without the Bill.

I am strongly opposed to the continuation or expansion of coal mining for climate reasons. There is no world in which new coal mines support a clean energy transition. That coal needs to stay in the ground if the world is to avoid the real risk of runaway climate change.

I don’t agree with seabed mining within NZ territorial waters or even outside. The NZ government has supported the moratorium on deep sea mining in areas beyond national jurisdiction since 2022. The impacts of seabed mining are still unclear but it could disrupt marine ecosystems and hinder the ocean’s ability to sequester carbon, making climate change substantially worse. It would be embarrassing to do a U-turn on this and it would damage our reputation internationally.

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?

The minerals sector could aim to become the first mineral sector to be carbon-neutral or even carbon negative in the world, and therefore provide an overall benefit for the climate. We could be a global leader in conscious mining, recycling of metals, and just transition from coal mining to a renewable future. This will not be possible if coal remains in the strategy.

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?

Climate, environmental, human health, 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.

We should not commit our economy into being reliant on mining, and especially not new coal mines. Some minerals may be necessary for the renewables transition, but we still need to carefully evaluate the impact of their extraction.

Conservation lands should be totally protected from all mining.

# 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:

Any mining on conservation land should be scrapped and the fast track approval bill should be dropped. The strategy should be focused on how the mineral industry can transition and help the rest of the world transition to a low-carbon future with minimal environmental and social damage.