

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: Jenny Campbell

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

If yes, please tell us the title of your company/organisation:

Coal Action Murihiku

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:

Coal Action Murihiku is the sub-branch of the national organisation Coal Action Network Aotearoa campaigning for an end to coal mining and use in Aotearoa, due to the climate change impacts of burning coal and the environmental impacts of mining it. Our particular emphasis is on stopping the impact of coal mining in Murihiku, Southland

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.

- 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?

Enhancing Prosperity for all New Zealanders

The Strategy makes unsupported claims regarding the possible mining economic prosperity for all of us, especially our lack of a full comprehension of 'our minerals ecosystem and strategic risks'. An inventory of the minerals that exist in New Zealand needing to be set up shows there has not been accurate information already at hand, so undermining the predicted benefits, with a reliance on increasing coal and gold production probably.

The draft document outlines the financial benefit to Aotearoa will require a 100% increase in exports from \$1 billion to \$2 billion by 2035. This means establishing 10 significant mining operations, each having the potential to generate \$100 million per year, probably through scaling up coal and gold mining. Our concern is that most will probably be on Public Conservation Land.

Production growth will come at the expense of environmental outcomes and that mineral extraction will not be environmentally sustainable. The environmental wrecking of our environment through the mining industry in Aotearoa is well known. Full remediation is impossible. Mining companies are well known for their lack of adequate remediation. Their impact on our endemic biodiversity, our clean waterways, air quality and the communities close to them is always negative and those companies servicing the mines do not leave prosperity behind them.

Denniston and the Stockton Plateau have already been extensively mined, with further mining proposed. These plateaus were formed around 40 million years ago. Open cast mining has destroyed those rare sandstone platforms and boulder fields, which can never be recreated. These rare and fragile ecosystems are home to many threatened plants and animal species, most endemic to the site. It is imperative that what remains must be protected from further mining.

Coal Action Network Aotearoa, working with Forest & Bird, has actively opposed the proposed open cast mine by Stevenson Mining at Te Kuha in Buller on the West Coast. The proposal would remove a forest covered mountain top clearly visible from the iconic Buller Gorge and Westport and permanently damage about 150 ha of rare and pristine landscape. Te Kuha is home to threatened species including the great spotted kiwi, West Coast green gecko and 17 threatened plant species. This is mostly on publicly owned land.

Coal Action Network Aotearoa and Forest & Bird had significant wins in working to protect Te Kuha, including at the Supreme Court. However the mining company appears to think it can still mine there, using the proposed 'fast track' legislation. We as Coal Action Murihiku, along with 1000s of other submitters are opposed to this company thinking it can use this totally inadequate fast-track process.

Dreams of many jobs being created in the area does not offset the long-term damage to these unique environments done through mining. Coal and gold are part of very volatile markets and the whole world now knows we need to get out of coal as quickly as possible because of its impact on climate change. We are losing our social licence in the international field if we continue to cause this destruction through mining coal. No analysis is provided in this Strategy around the economic damage that these activities could inflict. New Zealand's brand as a place of outstanding natural landscapes will be lost if this philosophy continues, totally destroying our tourism industry business.

Demonstrating the Sector's Value

There is little factual evidence provided about the sector's actual value and the failure to carefully consider the real cost to our economy. Transparency about making decisions can mislead us by exaggerating the economic benefits to our economy. People will continue to be suspicious of the mining industry, especially given the obvious close relationships they appear to have with this Government and certain Ministers. We no longer trust them and they are losing their social licence to operate.

Ministers are showing a total disregard for our endangered species & native biodiversity through these proposed mining operations which horrifies us, the people of Aotearoa who are spending their precious time & money protecting them from just such devastation.

Delivering minerals for a clean energy transition

Any proposal to mine should be subject to careful, detailed scrutiny. Using resource recovery from our many landfill sites should be explored before any mining is approved. There is an imperative for no further mining of coal, oil or gas in Aotearoa, because of impacts on climate change. Our emphasis must be on transitioning to clean energy & reducing pollution and health impacts from fossil fuels.

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?

Ambition is not the problem- environmental degradation and irresponsibility is!

Our ambitions should be to reduce mining- not increase it- for all of the above reasons.

These strategies do not enhance the well-being, health and the broader recognition of a good life in Aotearoa. This can only be done by supporting a clean energy transition.

We are totally opposed to the Fast-track Approvals Bill as it enables precious natural resources to be sold offshore with little gain to people in Aotearoa . The proposed Bill gives total power to 3 MPs which makes us vulnerable to corruption now & in to the future. It does not ensure a safe, productive, high-value minerals sector.

We strongly oppose the continuation or expansion of coal mining for climate reasons. New or expanding current coal mines does not support a clean energy transition, as identified by science.

We do not support seabed mining within NZ territorial waters or beyond. Since 2022, the NZ 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.

<https://www.beehive.govt.nz/release/nz-backs-conditional-moratorium-seabed-mining-international-waters>

Off the Taranaki coast, hapū and iwi are strongly against seabed mining. A government that honours Te Tiriti would respect the views of these custodians. Seabed mining threatens the ability of the marine environments to provide kaimoana and support fisheries.

The ocean is our world's largest carbon sink, absorbing 25 percent of all carbon dioxide emissions and absorbing 90 percent of the excess heat generated by these emissions. However, due to marine biodiversity loss from plastic pollution, warming waters, ocean acidification (due to excess CO2 absorption), shipping, and cruise ships, the ocean is losing its ability to do most of the work of climate action for us. Seabed mining, which we know will massively damage the marine

ecosystems, will further devastate the ocean's ability to sequester carbon, with extremely negative impacts on global warming. New Zealand must become the solution to restoring ocean health, not the problem.

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?

4. The Strategy should not be promoting potential mining opportunities, willy-nilly. It should set out first steps that will properly assess mineral availability, together with a cost benefit analysis of the extraction of particular minerals. This must include the environmental cost over time and explicitly exclude further mining on public conservation land.

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re 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?

5. This Strategy is based on unsupported claims regarding economic benefit. It fails to adequately consider such matters as the environmental and human health harms caused by mining, especially the mining of coal and other fossil fuels. Te Tiriti of Waitangi has had little consideration in this proposed Strategy, especially regarding the implications of the aggressive expansion of mining. It is very likely that fast-tracked resource consents for mining will be revoked by a future Government. This puts the sustainability of the strategy under question. Public opposition and legal challenges to the taking of private, public and Māori land to enable mining will impact dramatically on trying to develop this proposed strategy further.

re 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 Strategy should explicitly exclude any new mining on Public Conservation Land. It is absolutely unacceptable to 'balance' the loss of our unique, endemic, plants, animals, and the ecosystems they rely on **against plans to increase mining**. Once these species and ecosystems are destroyed, their loss is total to our future ecosystems, leading to imbalance. It seems Ministers are actively advocating for the extinction of native species, while the Minister of Conservation is disregarding their statutory responsibilities by claiming that protecting at-risk species is too expensive, is totally unacceptable

Evidence from New Zealand's past record with mining and internationally shows that they cannot be trusted to restore the landscape to its original state. In fact mining processes by definition cannot do that! The strategy does not cover this aspect of what is needed to be done before the mining company even starts their devastating processes!

International best practice for sustainable mining requires engagement with communities. The Strategy and the proposed fast track legislation, totally ignores that imperative!.

The Strategy should properly consider a cost benefit analysis of the intention to expand mining. This should consider the environmental and economic impact, the risk to New Zealand's 100% pure brand, the cost to the taxpayer of any clean-up of any potential abandoned operations.

It should also consider the responsibility New Zealand has as a global citizen and the effect mining activities contribute to biodiversity loss and climate change. It should consider the way in which New Zealanders see themselves as people who value our natural landscapes and wish to see them protected.

We should not be locking our economy into being reliant on mining, and especially not fossil fuel expansion in the form of new coal mines. There are always other options for decentralised regional income through high-value economies such as value-added products and IT. While some minerals will be necessary for the renewables transition, this need is far more limited than the proposed strategy suggests.

Coal Action Murihiku believes that there should be much more consultation with Iwi & Hapu, especially relating to Te Tiriti Principles and Kaupapa. Their wisdom is invaluable when considering Strategies of this nature, so closely connected with the environment of waterways, our coastal waterways, native biodiversity and endemic species.

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:

Coal Action Murihiku agrees with this summary from Coal Action Network Aotearoa.

Firstly and most importantly, the Fast-track Approvals Bill must be dropped. This Bill is actively harmful for all sectors, mining included. This is because it opens up workers and mining regions to exploitation from overseas corporations, with no opportunity for input from local communities, let alone the environmental, social, and public health impacts of some of the proposed projects. An effective, long-lasting, sustainable, and robust mineral strategy should not rely on anti-democratic legislation like the Fast-track Approvals Bill.

The Strategy should rule out any future coal mining and the expansion of mining and any new mining operations on public conservation land. It should include provisions for a just transition away from coal mining and fossil fuel production.

We do support proposals to move towards a circular economy. Reducing resource use, and reusing existing materials, should always be considered in preference to mining.

Whakataukī: Titiro whakamuri, tītiro whakamua.

Look back & reflect, so you can move forward.

Submitted by Jenny Campbell for Coal Action Murihiku

QSM for the Environment

Ko Takitimu tōku maunga.

Ko Oreti tōku awa.

Ko Takitimu tōku waka.

Ko Ngāitahu ahau.

Ko Te Rau Aroha tōku marae.

No Mossburn tōku kainga.

Ko Jenny Campbell ahau.

He iti, he pounamu. It may be small but it is very precious.