

# 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: Tim Jones

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:

Coal Action Network Aotearoa

## 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 Network Aotearoa is the national organisation 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.

**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?

### Enhancing Prosperity for all New Zealanders

The Strategy makes a number of unsupported claims regarding the contribution of mining to economic prosperity for all New Zealanders. It acknowledges that there is a lack of a complete understanding of 'our minerals ecosystem and strategic risks'. It also states that there will need to be an inventory of the minerals that exist in New Zealand. This casts doubt on the accuracy of the predicted benefit and seems to rely on increasing coal and gold production.

The projected financial benefit to New Zealand (according to the draft document) will require a 100% increase in exports from \$1 billion to \$2 billion by 2035. This will be achieved by aiming to accelerate growth (as an example) through the establishment of 10 significant mining operations, each having the potential to generate \$100 million per year. Although what these significant mining operations will be (or where) in New Zealand is not stated it is likely to be as a result of upscaling coal and gold mining. It is also highly likely that all or many of these significant operations will be on Public Conservation Land.

The draft strategy's claim that production growth will not come at the expense of environmental outcomes and that mineral extraction will be environmentally sustainable. This claim is completely contrary to the legacy of environmental despoilation that the mining industry has caused in New Zealand. History tells us that full remediation is impossible, that mining companies will fail to perform even partial remediation adequately, and that it is highly likely companies will avoid their responsibility for remediation – for example, by going bankrupt – and leave this burden for the taxpayer.

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 irrevocably destroyed the rare sandstone platforms and boulder fields and can never be recreated. These rare and fragile ecosystems are home to many threatened plants and animal species, some endemic to the site. 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.

Despite Coal Action Network Aotearoa's and Forest & Bird's significant wins in working to protect Te Kuha, including at the Supreme Court, the mining company has stated that it still intends to mine there, and it appears that the company plans to circumvent its legal defeats by applying for the project to be 'fast tracked' as an outcome of the proposed legislative change. Coal Action Network Aotearoa, and many other submitters have been clear in their submissions around the Fast-track Approvals bill that proposed projects that have been through a robust legal process of consideration and found wanting should be not be enabled through the back-door, grossly inadequate fast-track process.

The projection (as a result of these changes) is an increase of 2,000 jobs regionally over the next decade. This is minimal and in no way could offset the long-term damage to these special places that will occur as a result, nor of the economic losses caused by despoiling biodiverse, beautiful ecosystems with mining. It takes

no account of the highly fluctuating market for minerals such as coal and gold. No analysis is provided around the economic damage that these activities could inflict. It is likely to have a negative impact on New Zealand's brand as a place of outstanding natural landscapes. Even a cursory look at how our country is promoted internationally shows it is heavily reliant on the outstanding landscapes on our conservation land. The value of this brand to New Zealand's exports and tourism markets, vastly exceeds the limited economic benefits claimed in the Strategy.

### **Demonstrating the Sector's Value**

It is difficult to understand how the sector's value could be demonstrated to New Zealanders given the lack of evidence provided about the sector's actual value and the failure to carefully consider the real cost to our economy. The Strategy and associated key actions will not provide for any transparency as to how decisions are made, it misleads the public by overstating the economic contribution it will make to the overall economy. It is entirely unclear as to how the New Zealand public could have any confidence at all in the long-term outcome of the Strategy. The likely outcome of the exaggerations, unsupported assumptions and flimsy rationales presented in this strategy is that New Zealanders' legitimate suspicions of the mining sector, and of the unhealthy close relationship between the sector and certain Ministers, will be further hardened, and that the sector's social licence to operate will face increasingly implacable opposition.

Furthermore, confidence in the sector's value is likely to be undermined given stated Ministerial indifference to the impact mining will have on our most threatened plants and animals by the Resource Minister. New Zealanders care deeply about our natural landscapes and have a great deal of pride in our Public Conservation Land. This is demonstrated by the large number of submissions on the proposed Fast Track legislation and tens of thousands of New Zealanders' willingness to publicly demonstrate their opposition to it.

### **Delivering minerals for a clean energy transition**

Any proposal to mine should be subject to careful, detailed scrutiny, and all other options – for example, using less or promoting resource recovery – should be explored before any mining is approved. Furthermore, there must be no further mining of coal, oil or gas in Aotearoa. Making it easier to mine fossil fuels is the complete opposite of transitioning to clean energy.

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 [ambition is not the problems – environmental degradation and climate irresponsibility is]
- Not sure/no preference

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

Firstly, the answer options to this question are biased and leading. The actions are not the right ones, but not because they are insufficiently ambitious! Choosing such wording for the questions clearly shows that this consultation is biased from the start.

These actions are wrong because they do not achieve the strategic pillars of enhancing the prosperity of New Zealanders, or supporting a clean energy transition.

We are strongly opposed to the Fast-track Approvals Bill. This sells out NZ's precious natural resources to large overseas corporations. The undemocratic, absolute control that this bill gives to three Ministers makes us vulnerable to corruption, in this current government but also for future governments to come. The Fast-track Approvals Bill is in no way necessary for a safe, productive, high-value minerals sector.

We are 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. This is backed by an overwhelming scientific consensus.

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 also 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?

The Strategy should not be simply a grab bag of potential mining opportunities. It should set out first steps that will properly assess mineral availability, a cost benefit analysis of the extraction of particular minerals including the environmental cost over time and explicitly exclude further mining on public conservation land.

**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?

Not only is the Strategy based on unsupported claims regarding economic benefit, but it fails to consider, or to adequately consider, matters including the environmental and human health harms caused by mining – especially the mining of coal and other fossil fuels; the Te Tiriti implications of the aggressive expansion of mining; the likelihood that fast-tracked resource consents for mining will be revoked by a future Government, thereby putting into question the sustainability of the strategy; and public opposition and legal challenges to the expropriation of private, public and Māori land to enable mining.

**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 Strategy should explicitly exclude any new mining on Public Conservation Land. It is simply unacceptable to 'balance' the loss of our unique, and in many instances endemic, plants, animals, and the ecosystems they rely on against plans to increase mining. Once these species and ecosystems are destroyed, their loss is irredeemable. The fact that some Ministers are actively advocating for the extinction of native species, while the Minister of Conservation subverts his statutory responsibilities by claiming that protecting at-risk species is too expensive, is utterly indefensible.

The Strategy attempts to gaslight New Zealanders by claiming that mining can have a light footprint by mining 'responsibly' and effectively putting things back to their original state. Evidence from New Zealand and internationally shows that this is not the case. As noted, the strategy fails to set out what 'responsibly' means or how this would be assessed.

International best practice for sustainable mining has as one of its pillars engagement with communities. This is the polar opposite to what is proposed in the Strategy and the proposed fast track legislation.

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.



# 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:

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.