

A Draft Minerals Strategy for New Zealand to 2040

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Privacy of
natural persons

email

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I have no privacy issues with my submission.

I am an independent researcher, and a member of West Coast Forest and Bird, and the Green Party. I have deep concerns that the global existential crisis we are all facing is not being recognised by those with the power to change national strategies and policies to reflect these crisis concerns and act on that knowledge for good rather than exploitation. I live on the West Coast and although we are richly endowed here with the bounties of the natural world it is recognised that this is an anomaly rather than the normal, an anomaly that must be protected for the very important values held by its remnant intactness. There is also the fallacy that the phenomenal flora growth rates on the West Coast mean that any natural area destroyed for whatever means has the ability to bounce back quickly. However the serene evolution of a forest takes around 1000 years, due to its slow-growing canopy species; sub-canopy species can spring up, but the grand forest giants, the crowning glories with their aerial ecosystems, take their time.

Strategy at a Glance:

Indicators of aim achievement:

'Our economy has access to the minerals it needs at the right time'

We may need minerals but if they are in the wrong place (serious environmental constraints such as endangered biodiversity) or the concentration is so low that extensive ecological damage will occur in order to secure them, then those minerals will not sustain our economy in the long term due to the positive feedback from the environmental damage involved.

- Historic mining damage on Stockton (Buller) is requiring \$100 million to rehabilitate;
- Roger's Rocky Mine in Upper Millerton was closed due to serious consent breaches in relation to mine waste treatment. The regional council took over to rehabilitate, but a decade later that closed mine is still leaching acid mine drainage into 2 specific waterways high above and overlooking the ocean. The outlets of those creeks into the ocean is a reddish tawny colour due to precipitation of the acid metals with the seawater. There will be little to no aquatic life for the length of those creeks.
- 17.5 million to clean up Tui Mine in the Coromandel, after the miner went bankrupt.

Do our taxpayers really want more frequent occurrences of such as these three examples?

'The sector has doubled its mineral exports to \$2 billion by 2035 through an export-led growth pathway'

We can't go squandering nature in order to adhere to such sweeping statements. We cannot allow ambitions of profit to supersede healthy environmental and conservation stewardship.

Production growth will not come at the expense of environmental outcomes or workers' health and safety.'

That sounds good but what exactly is 'environmental outcomes'. As it stands it says nothing, its just a euphemism. Environmental outcomes can be good, bad, or otherwise.

'Transparent and efficient decision-making under our regulatory framework'

This proposed strategy is already out of date if it is not including the Fast Track legislation, which legislation will allow its own purpose to override the purpose of other related Acts and Regulations. There is little to no transparency in the Fast Track Bill.

Efficient decision-making should not come at the expense of the natural environment nor amenities.

Why do we need a minerals strategy?

The length of time it takes to deliver mining projects is costing us. We need to get the enabling policy and regulatory settings for the resources sector right

Fristly, what is meant by, 'right'? Reading this strategy, in combination with the Fast Track Bill, tells me that, 'right', means undermining the resource management process.

Then, there are varied reasons for delays; a very important reason being to ensure that nature is given a fair chance in the face of 'development'. Another is to ensure that our laws are adhered to: the Environment Court appeals over Stevensons Te Kuha mining proposal have been nothing more nor less than prudent, exposing failures of authorities to address all aspects of the proposal which should have been under consideration at the time of application by the mining company.

Creating more enabling policies for the mining sector is a colonial outlook. It was less than 200 years ago that Aotearoa was an unspolied and unexploited paradise, with our Gondwana heritage in ecological balance going back 80 million years. It didn't take long for the saws to get to work and decimate those immense, towering forests, reducing much of that fabulous biodiversity to charred, smoking mud. It didn't take long for mines to be dug and spew acid mine drainage, indiscriminately poisoning waterways so that no life wanted to make those waterways home. We have come to a point - the breaking point - where we have a global biodiveristy crisis and a global pollution crisis; but still our

governing bodies see fit to resurrect that outdated, outmoded colonial outlook, which can only bring disaster and catastrophe in a world where no more harm should now be done to it. It is imperative the human species now atones for the gross, thoughtless, callous harm it has done to the balance of nature, and species other than ourselves that we apparently have no profitable need for. A paradigm shift in outlook is urgently required. Creating a more enabling policy for mining is not that paradigm shift but its polar opposite.

Mineral activities need to happen in a responsible and environmentally sustainable manner

'If environmental risks associated to increased mineral activities are not properly managed, they could mean fiscal risks to the Crown and New Zealanders'

Agree. a very important consideration. However the purpose of the Fast Track Bill does not acknowledge this. For this strategy's statement here to have any meaning it would need to require that the Fast Track Bill change its purpose to acknowledge the environmental harm associated with mining.

Technological innovation and responsible recycling of materials need to be part of a responsible minerals regime

Agree

We need to attract the right investment for our economic growth and access international markets

We need to be very careful of any arrangements backfiring, such as future investor litigation in conjunction with free-trade agreements.

Avoiding unintended consequences

.....we also want to avoid any unintended social and environmental consequences that could occur due to increased minerals activities.

Agree, but how does this mesh with the strategy's statement,

'The length of time it takes to deliver mining projects is costing us. We need to get the

enabling policy and regulatory settings for the resources sector right'

We need to make informed choices about how we wish to develop our minerals

.....allow an all-of-government approach to anticipate, prepare and act on complex challenges and potential opportunities

Yes, it is important to get an across-the-board agreement on such issues, bringing in minor political parties also.

However, has this strategy received cross-party support? if not then that is probably the largest failing with this proposed strategy. With our 3-year political cycle the opposing government may just scrap this strategy on entry to governance.

It's a plan for all-of-government and other participants to coalesce around and sets measurable and achievable actions to drive progress

Agree with the first part.

Driving progress?

Shouldn't the latter part of the statment above be:

'achievable actions that can be measured in order to drive progress in an environmentally sustainable manner'?

How we'll get there

The following strategy actions will drive progress

1a We will engage Geological and Nuclear Sciences Limited to complete a detailed stocktake of New Zealand's known mineral potential.

I'm not sure GNS is a private, limited company, I believe it may be a government department. This embarrassing mistake is a reflection of the quality of thinking behind this strategy. Whenever profit is put before protection of, or considerations of sustainability of, the natural world, a chaotic mess ensues that just gets worse with time no matter how strategies and outlooks are altered to suppress the chaos; and often this chaos is manifested outwardly as debt.

I thought the stocktake had already been completed with the aerial radar grid exercises a few years ago? Or was that only the West Coast?

2b *We will identify when and where supply risk for critical minerals exists, so that we can take action to reduce vulnerability*

So long as it is environmentally sound to do so, please.

3 Develop a more enduring, efficient and responsible regulatory framework

3a *We will develop a one-stop shop fast-track approvals regime to accelerate the development of regional and national projects of significance, including mining projects.*

A Fast-Track approvals regime will negate any of the nice, caring stuff that has been already said in this strategy. The purpose of the Bill is to *'provide a fast-track decision-making process that facilitates the delivery of infrastructure and development projects with significant regional or national benefits'*. This purpose's intention is to override any other legislation concerning resource management and conservation. The Bill is very noticeably scant on ensuring protection of values other than digging up minerals.

Amending other legislation to make it easier to dig up minerals is highly irresponsible, short-sighted, and will ensure very expensive taxpayer-funded remediation in the future, the same as has always been except for when the RMA was implemented, finally ensuring proposals would be looked at from a sustainable viewpoint. There are too many mining legacies requiring taxpayer funding to remediate, and this strategy will ensure this taxpayer-funded process will endure into the far future.

The RMA process as it stands ensures to some extent, sustainable development, but amending the RMA to suit mining needs will NOT ensure *'responsible development'*

4c *We will encourage the sector to increase local workforce input in mining projects through employment, training, and contracts for services.*

4d *We will encourage skills and training programmes that aim to grow and retain a skilled workforce.*

Surely mining companies and training institutes are already working to capacity in this

respect? I did hear that Tai Poutini polytech on the West Coast had closed down mining training due to lack of support.

Within the first three years

6d. We will monitor and report on the social, environmental and community effects of mining on our regional communities.

Long-term mining communities are well aware of mining effects on our regional communities. The Ngakawau River draining Stockton coalmine tells it all, with its rust-coated estuarine rocks, rusted galvanised bridge handrails and concrete lampposts, and water that is a kaleidoscope of mining colours.

Long-term mining communities are divisive in an 'us and them' way, where miners tend not to associate socially with others but consider themselves an elite group. They often have large, powerful vehicles, driven often, disturbing otherwise quiet communities. Then there's the mining recreational drug of choice, methamphetamine, bringing its hideous scourge to highway towns and remote end-of-road communities leading into mining country.

We already know the myriad community effects of mining. Although there can be benefits like spin-off industry and retail, and mining companies' contributions to community amenities, overall the social effects can be very negative to healthy social cohesion.

1. Are the strategic pillars of the 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?

FAIL! We cannot dig up minerals without an in-depth consideration of the environmental issues involved, and this requires a proper resource management look no less than what the Resource Management Act requires.

2. Are the key actions the right ones to deliver on our strategic pillars, and are they ambitious enough? What else might we need to consider?

Please see question 1 answer.

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

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

Please see Question 1 answer.

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

Please see Question 1 answer.

Summary:

It appears to me the intention of this strategy is to create a mineral extraction sector by cobbling together disparate pieces of the mining jigsaw from sources that don't exist; often not existing due to their dire environmental outcomes if such activity goes ahead.

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