Submission for Draft Minerals Strategy for NZ

from Jenny Easton retired Resource Scientist

Q1 "is there more we need to consider"?

Yes!!

A. You have not considered the Carbon Emissions from this energy intensive industry, or respected our Emission Reduction Plan that requires a reduction in GHG. The ERP includes industry, and it is alarming that this strategy doesn't even mention it.

Mining thermal and coking coal are dirty, polluting industries, for products that climate scientists insist should stay in the ground if we want a viable stable climate.

Gold particularly is a luxury item and the extraction is very energy intensive, and heavy metals associated with it also require energy intensive refining.

B. The lack of bipartisan agreement to give the industry certainty. By avoiding having this discussion in a logical process i.e. "What do we need and how can we obtain it", this strategy instead says we have minerals that overseas companies can exploit in return for a few local jobs. With the prospect of stranded assets there is unlikely to be bipartisan support..

C. Environmental damage.

The EPA DMC has ruled against seabed mining and if those decisions are overruled by the proposed Fast track legislation NZ will lose its environmental credibility. The mining industry wants to use NZs reputation but doesn't appear to be willing to respect the environmental considerations and restraints made by experts.

The public will suspect that mining, which is a short term extractive industry that does not lead to sustainable communities, will trash the environment to make a short term profit for overseas owners and a small amount of royalties for the government. The West Coast has had over 150 years of boom and bust ventures and many of the long term downsides and destructiveness of these mining projects wont become visible for a number of years and will be a burden for the future generations.

There are also transport costs associated with mining because the access roads need to be suitable for heavy trucks and add to the consequent environmental damage on top of the actual mine, and the need for upgrading the port facilities.

We should be following the polluter pays principle both for carbon emissions, environmental damage and toxic waste. There is a suspicion that the "deal" being discussed for offshore drilling to reduce the bond for remediation and closure of wells will be applied to mining and the taxpayer will be subsidising these industries.

D. The need to wait until stewardship land is reclassified. The assumption that everything outside schedule 4 has no significant environmental value is incorrect, and there are opportunity costs permitting mining on that land.

E. Ignoring the fact that seabed rock phosphate has radioactive Polonium with it and that Antimony is extremely toxic to mine and refine.

F. The possibility of "mining" precious minerals from the recycled ewaste and landfills has not been properly scoped. The % of gold is higher than most gold bearing rock.

Q4 Are there challenges we haven't considered?

YES!!

The industry doesn't have a social licence to mine in NZ for five reasons:

- The proposed FTA and RM Amendment #2 stop the public and environmental interest groups from having any input in the decisions. With no say or legal redress the public wont support this industry. Its particularly important that real community consultation occurs on local mining initiatives given their huge environmental impacts. The mining industries know this and yet this strategy says the FTA and RM#2 are set to pave the way!
- The history of mining leaving badly constructed tailing dams for the taxpayer to remediate eg Tui Mine above Te Aroha township, acid drainage still affecting streams on the West Coast, threats to use wetlands in the mining process, and the financial bonds for remediation are not strong enough. The poor workplace standards plus greedy and ignorant management caused the Pike River tragedy, and there is no guarantee that has changed.
- Another requirement for a social licence is strong independent regulations. However there is no indication this will be the case with FTA and RM#2. It is very likely to be "learn as we go" and the overseas companies, and Bathurst will be more concerned about profit and wanting to cut corners. With the current government favouring reduced oversight it is not clear how, and if, there will be resourcing for the experts required to monitor these industrial processes.
- The Minister of Mines doesn't appear to have any respect for our environment, and yet 80 % of NewZealanders voted for Parties that respected and valued the environment. He has discussed the possibility of the taxpayer helping fund or subsidise this short term extractive industry both in locating minerals and remediation and this is sidestepping our highly valued democratic processes.
- Geo politics. If this strategy turns out to be a way to provide pro American countries
 with rare minerals that can be used by the military, the public will be even more
 suspicious and less trusting of the mining industries and our Government.

Yours sincerely, Jenny Easton 25/7/24