

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: cindy baxter

Email address: Privacy of natural

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:

Kiwis Against Seabed Mining

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:

Community group

(Why do you never list NGO's on these consultation forms? Does it not occur to you there are organisations that represent communities and civil society?)

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. 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?

What happened to the last strategy? Have we abandoned the three pillars adopted in 2021? If so, why? (no explanation is given)

They were:

1. a low carbon economy, 2. growing a productive, sustainable, and inclusive economy, and 3. social responsibility

If we want to make a clean energy transition, why is the first step to look at what minerals we have and how we can best exploit them? Why are we not first looking at how Aotearoa can make a clean energy transition, what we need to get there, and the cleanest way of doing so and the alternatives to the more damaging of them (like lithium, for example)?

"Delivering minerals for a clean energy transition" sounds great, but we have no idea what our

clean energy transition should look like; there's been no national conversation.

This whole strategy looks like MBIE has taken Straterra's list of minerals (it has very similar lists of minerals) that we have in Aotearoa and developing a strategy as to how best to exploit them to make (some) cash, but dressing it in "clean energy transition" greenwash - just as Straterra has done.

This is not how it's done. **We call on MBIE to do better and to ditch this whole strategy.**

Two examples:

* ***why dig up vanadium from the seabed to make grid-scale batteries when China is now making sodium-ion grid-scale batteries?*** Vastly less expensive, and much less dirty.

Nobody knows how to extract vanadium out of the ironsands, which does appear (according to the single masters paper the company has posted on its website) to be an extremely dirty process. And there's absolutely no way that the company would undertake this process itself, let alone create jobs, and certainly not in Aotearoa. 100% Australian-owned company Trans Tasman Resources (TTR) has already said it would transship the ironsands to another ship at sea and send it straight to Asia

We'd be left with a wrecked South Taranaki Bight, a rich Australian holding company and no local jobs. *This is not what "enhancing prosperity for New Zealanders" looks like.*

* **Equally, Chatham Rock Phosphate**, a company that has registered itself on a lowly stock exchange in Toronto, and which has a terrible financial reputation, is trying to sell the idea that it can dig up a "sustainable phosphate" resource on the Chatham Rise. The EPA roundly rejected the application, because of the clear environmental problems that would arise from the activity. The Chatham Rise Phosphate might be low in cadmium, one of the chemicals that is causing so much havoc in our waterways, but ***it contains radioactive polonium.***

There has been no investigation as to the impact of putting polonium-rich phosphate on New Zealand farms - on our health, animal health, soil health or the health of our already-stressed waterways. We have ZERO expertise in monitoring for polonium pollution in Aotearoa. And exporting polonium-rich phosphate to the world doesn't appear to us to be a very sensible thing to do for our "clean green" reputation.

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 ~~and not ambitious enough~~
 Not sure/no preference

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

Key action: "We will find out more about deep-seabed minerals and assess the challenges and opportunities of extracting them."

We have been through a 12-year process of finding out about the deep seabed minerals and the challenges of extracting them. Suggest you start with reading the thousands of pages of evidence delivered under the EPA process, then read the Supreme Court decision which states that anyone wanting to mine the seabed should prove they would cause "no material harm" (and if they did, prove the harm could be remediated). The EPA set 109 conditions for the company, which still hasn't even done any baseline data monitoring.

I spoke with one of the offshore wind farm companies who are gathering that precise data before applying for a consent. Yet TTR still hasn't done this basic work. You cannot prove you're causing no harm if you don't even know what lives there.

Yet your strategy doesn't even mention the EPA as a consulting partner. Why not? The EPA has a lot of experience with considering three seabed mining applications, turning down the first two and giving the third a dodgy consent (evidenced by 109 conditions) that was quashed by three courts. Why not consult the EPA and the communities who have fought these applications?

One of the goals of the Minerals strategy is that

"There is public confidence in responsible minerals production - Responsible regulatory settings and the behaviours of sector participants will have built public trust that the sector is operating in line with how New Zealanders believe mining should be done. Production growth will not come at the expense of environmental outcomes or workers' health and safety."

This makes no sense in light of the fast-track process, through which unpopular projects already rejected by the public and the courts are likely to be rammed through a system that shuts down any public input. This is going to achieve the polar opposite of "public confidence in responsible minerals production" and it's difficult to see how it could be argued otherwise. **This strategy is designed to put mining interests ahead of public concern, any environmental concern. Production growth is absolutely going to come at the expense of environmental outcomes. To claim otherwise is absurd.**

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?

How about leaving them in the ground?

Look at the alternatives to the minerals we have in Aotearoa. Push those instead.

Find opportunities to talk with other government departments about the conservation and environment priorities. With the EPA about its experience with some of the companies you're deciding are worth supporting.

A minerals strategy that doesn't put climate change and sustainability at its heart is barely worth reading.

The opportunity of a net zero emissions strategy means leaving the coal in the ground.

That you have used the "coal keeps the lights on" language is astounding. Read the IEA's NZE. Ditching the strategy to get out of coal was very short-sighted.

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?

The strategy rides roughshod over the main challenges for the minerals sector, ie the prioritisation of mining over public and environmental concerns. We have environment court and EPA processes for a reason. Mining ventures that have been refused have considered all aspects and found the mining ventures wanting should not be allowed to go ahead.

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 economics of giving away our minerals to overseas companies, or companies registered overseas doesn't appear to have been addressed at all. Seabed mining is the perfect example: TTR has said it will transship the ironsands at sea and they'll be sent to Asia. None of the profits would come back to Aotearoa, as TTR is 100% owned by an Australian company.

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:

