

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:

Privacy of natural persons

Email address:

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:

Low Carbon Kāpiti Inc.

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:

Low Carbon Kāpiti is a grassroots community organisation, an advocacy group and an incorporated society (#2674431).

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?

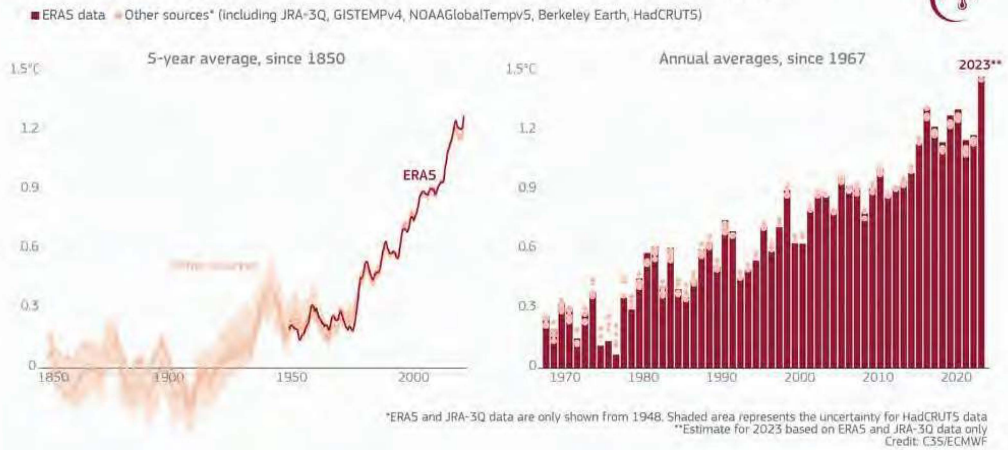
Yes, they are suitable No, they are not suitable Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice? Or is there more we need to consider?

The strategy isolates itself from the wider impacts of climate change.

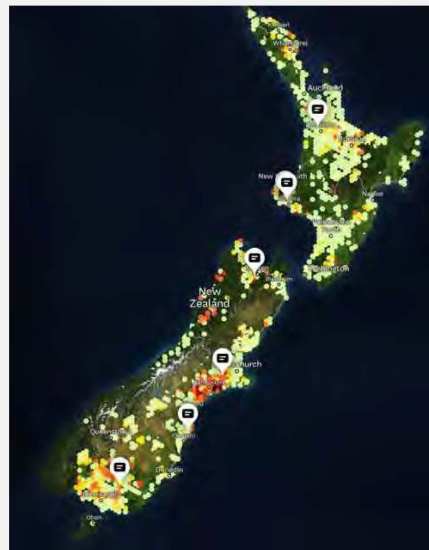
- **Climate change is HERE and NOW. Aotearoa New Zealand is already paying for the impacts of our emissions (Cyclone Gabrielle and subsequent flooding in Auckland, Wairoa and elsewhere) and the storms, tidal surges and heavy rainfall are all modelled to be more frequent and worse. The world has just experienced its hottest year on record and global warming has officially passed 1.5°C. Without massive effort and change, things are going to get worse. We cannot afford to mine more coal!**

GLOBAL SURFACE TEMPERATURE: INCREASE ABOVE PRE-INDUSTRIAL LEVEL (1850-1900)



See also: <https://www.washingtonpost.com/weather/2024/06/05/global-temperatures-1-5-celsius-record-year/>

- It is vital that the impacts of carbon and methane emissions and other degradation of the environment are considered in any new strategy. Two important aims should underly all minerals policy or strategy: 'Reducing greenhouse gas emissions in the mining sector as part of our climate strategy', and 'Protecting Aotearoa New Zealand's unique biodiversity and environment'. Climate and environmental protection need to be pillars of and key criteria in all policies of primary sector development.
- Low Carbon Kāpiti thinks there should be absolutely no more mining of coal or other fossil fuels in our country. As an aside, we do not support prospecting for or extracting further gas and oil deposits as the planet cannot afford to burn them.
- Low Carbon Kāpiti does not support gold mining in the conservation estate or near human habitation. Gold mining involves seriously toxic tailings and problems with water way pollution. Even underground mining poses problems with tailing and water pollution.
- Low Carbon Kāpiti does not support mining for agricultural rock phosphate on the Chatham Rise or on the islands. It has been well established that our use of rock phosphate fertiliser has caused massive problems in New Zealand's waterways. Our farmers seem far too dependent on it and its use is not sustainable. In addition, seabed mining has irreversible effects on our marine life and, once again, involves a significant increase in emissions from mining equipment.





<https://maps.greenpeace.org/maps/aotearoa/know-your-nitrate>

- Similarly, Low Carbon Kāpiti is opposed to any offshore seabed mining for sand or mineral nodules. Successful court rulings protecting the sea beds of Taranaki, Pakiri and Mangawhai and widespread public opposition have made such mining unwanted and illegal.
- Mining by private companies on private land should be well regulated and monitored to prevent environmental risk or damage. The onus of proof of safety to the environment should be on the mining company, not the government or local objectors.
- *'Enhancing prosperity for New Zealanders'* can only be considered in relation to climate and environmental protection. There will be no prosperity when the economy is wiped out by storms, floods, fires and rising sea levels taking out our homes and coastal town centres. That will be the outcome of mining and burning more coal.
- Crown royalties should be much more than 2% to pay for downstream environmental effects. When mining companies send profits offshore, no New Zealanders' benefit.
- *"Demonstrating the sector's value'*. Why is this the government's business? This is a strategy document, not propaganda. The mining of minerals is a private sector profit-making business, dominated by overseas ownership. It is not the government's business (as our elected representatives) to promote it, demonstrate its profitability or distort government policies in its favour – as this draft document does.
- *'Delivering minerals for a clean energy transition'*: As stated, minerals like coal and phosphate do NOT feature in a clean energy transition. Rarer minerals like antimony may be more useful in battery production, but Christie & Braithwaite suggest antimony is being used less in batteries, not more (Christie & Braithwaite, Mineral Commodity Report-2, Institute of Geological and Nuclear Sciences Limited, www.nzpam.govt.nz/assets/Uploads/doing-business/mineral-potential/antimony.pdf). However it is clear that antimony can be used in other aspects of modern technology and the Reefion deposit may be worth extracting. However Low Carbon Kāpiti would not like to see open cast mining for antimony and other minerals in the Marlborough Sounds, for example.
- The case for lithium extraction is more nuanced. Drive Electric says *"The [United States Geological Survey](https://driveelectric.org.nz/will-the-world-run-out-of-lithium/) revealed that the world's identified lithium resources are estimated to be around 79 million metric tons, with the largest reserves in Chile, Argentina, and Australia. The estimated amount of lithium needed to meet current demand is only between 0.5 – 1.3 million tons. However, this figure is expected to increase significantly in the coming years as the demand for lithium continues to rise."* (<https://driveelectric.org.nz/will-the-world-run-out-of-lithium/>?) The Spinoff reported in November 2020 that *"New Zealand has lithium deposits in the clays around Taupō and in hard rock along the West Coast of the South Island (as shown by a GNS survey in 2018), but mining these deposits would risk great environmental damage."* (<https://thespinoff.co.nz/business/04-11-2020/could-nzs-geothermal-resources-solve-the-worlds-lithium-mining-woes/>) Extracting lithium from geothermal brines may be far more sustainable and less invasive. Low Carbon Kāpiti supports the research of Geo40 to extract lithium sustainably from geothermal fluids and other brines (<https://geo40.com/geothermallithium/>).
- As pointed out in the submission by Linda Hill, 'clean transition' means developing training programmes and assistance for people to move away from jobs in coal, oil and gas industries. New Zealand needs to build a more circular minerals economy, recycling and reusing metals and batteries, cleaning up our water delivery and waste systems and moving to renewable energy systems. Aotearoa New Zealand needs jobs for the future, not the 19th century.
- To this end, Low Carbon Kāpiti supports the aim of accelerating a circular economy of critical minerals in New Zealand by recovery, reuse and recycling technologies and the development of funding opportunities to support research in this field.

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?

Low Carbon Kāpiti has no comment here.

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?

Low Carbon Kāpiti has no comment here, although note the comments on antimony and lithium above.

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?

- Yes, most definitely.
- The Strategy has omitted to consider the challenges of climate change and environmental pollution. These challenges will dominate our future to at least 2100.

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 effects of mining on emissions**
- **The effects of mining on biodiversity loss**
- **The effects of rock phosphate fertilizer on ground water nitrate levels.**

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:

