

# 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:
- 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:

## D. The best way to describe your role is:

- |  |  |
|--|--|
| <input type="checkbox"/> Academic/researcher                         | <input type="checkbox"/> Independent expert (please specify below) |
| <input type="checkbox"/> Consultant (please specify below)           | <input type="checkbox"/> Business owner (please specify below)     |
| <input type="checkbox"/> Tradesperson (please specify below)         | <input type="checkbox"/> Student (please specify below)            |
| <input type="checkbox"/> Industry group (please specify below)       | <input checked="" type="checkbox"/> Other (please specify below)   |
| <input type="checkbox"/> Industry participant (please specify below) | <input type="checkbox"/> Prefer not to say                         |

Please specify here:

Parent of a child who will be growing up in a world ravaged by climate change and ecosystem destruction.

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:

[Redacted area for explanation]

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.

[Redacted area for confidential information]

# 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?

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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?

I don't see any mention of minimising the social & environmental impact of the strategy. "Demonstrating the sector's value" is prioritising economic value over the massive risks and damage of ramping up mining.

It is critical to consider the social and environmental costs of downstream climate emissions, polluted waterways, habitat loss, biodiversity loss, toxic tailings, health of locals, and the social costs of tying communities to dying industries (e.g. coal).

Risk management is also a crucial part of the minerals industry, including damage from the above costs, and to other stakeholders. Risk should be considered alongside any economic value of a project.

Fundamentally, we should not be allowing any new coal exploration or mining. Peak coal has long passed, and the environmental destruction will stay with us long after there is no more coal being used. With the right will and incentives, we can electrify process heat and de-carbonise our power

grid to rapidly avoid coal. I would like to see future coal mining completely excluded from the strategy.

The third pillar: “Delivering minerals for a clean energy transition” is important, but we must not just blindly accept mining projects for these minerals without care and consideration of the negative impacts of mining.

## 2. Are the key actions the right ones to deliver on our strategic pillars, and are they ambitious enough?

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- 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?

To start, I disagree with the wording on this question. Bundling together ambition and correctness will lead to incorrect conclusions being drawn.

To clarify: I do not think the actions are the right ones; they do not resemble actions necessary in a climate emergency. They should be managed in an environmentally responsible way, rather than blindly going for economic impact.

I strongly oppose the Fast-Track Approvals Bill. It is a dangerous and short-sighted attempt to undermine our environmental protections, our democracy, and our founding national document. It also places economic benefit and corporate interests above all other considerations, overriding four decades of glacially slow improvement to environmental protections. The Fast-Track Approvals Bill is in no way necessary for a safe, productive, high-value minerals sector.

Related to my earlier comments on coal, I also strongly oppose any continuation or expansion of coal mining. We are in a climate emergency and every 0.1° rise in temperatures matters – we must rapidly transition away from this obsolete and damaging sector.

The science is clear: there is no way coal supports a clean energy transition – it just prolongs dirty energy. Imagine how quickly process heat would get converted to cleaner sources if there was an end date set on coal mining and imports?

I also do not support seabed mining anywhere, including within Aotearoa NZ's waters. I have been proud that NZ has supported the moratorium on deep sea mining, we should not go back on that.

A government that honours Te Tiriti would respect and honour the views of hapū and iwi, and not even consider seabed mining.

We cannot afford to limit/impair the critical carbon sink of the ocean. We rely on it to keep warming under control (90% of excess heat is absorbed by the ocean). Through things such as plastic pollution, warming waters, ocean acidification, shipping and cruise ships, the ocean is being seriously inhibited and damaged.

Aotearoa NZ must be part of the solution to restoring ocean health, please don't let us contribute to the problem.

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

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- Yes, there are                       No, there are none                       Not sure/no preference

### If Yes, what are the opportunities for our minerals sectors we should consider?

1. Commit to no new coal mines.

2. Implement strong, evidence-based frameworks for assessing whether to extract new materials based on (a) how they provide value to a modern, decarbonised world economy and (b) whether these benefits outweigh the many social and environmental risks involved.

3. Be a global leader in environmentally and socially conscious mining practices, recycling of metals and minerals, and just transition away from coal mining to a clean energy future.

#### 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?

1. Environmental challenges including (but not limited to) toxic tailings, polluted waterways, habitat destruction, biodiversity loss, and greenhouse gas emissions.
2. Human health and safety risks to both workers and communities (including due to the polluted waterways, etc. mentioned above).
3. Legal challenges
4. Land ownership challenges

#### 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.

We must not lock our economy into reliance on mining, and especially not fossil fuel expansion in the form of new coal mines. Our children and grandchildren are relying on us to give them a liveable planet.

Instead of exploiting finite natural resources to the detriment of our land, our ocean, our climate, and our people, we should seek income through high-value economies such as value-added products and IT.

Some minerals will be necessary for the transition to renewables, but our land and ecosystems are critical to our health and survival – we must not jeopardise them.

Finally, conservation land should be protected from all forms of mining – the biodiversity and carbon-sink value is too high.

# 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:

In summary, I urge you to:

1. Ban new coal exploration and mines, and progress a rapid just transition for this industry.
2. Ban seabed mining.
3. Exclude conservation land from mining and other forms of resource extraction.
4. Drop the Fast-Track Approvals Bill – it should not be usable to progress the minerals strategy.