



# Minerals West Coast submission to the Ministry of Business, Innovation and Employment on “A draft minerals strategy for New Zealand to 2040”

July 2024

## Introduction

[1] Minerals West Coast is an industry organisation representing the shared and collective interests of people and businesses operating in the minerals sector of the West Coast region and elsewhere in New Zealand.

[2] Our membership is diverse, spanning individuals engaged in part-time or fulltime mining operations and associated services, through to small and medium-sized, family-owned enterprises, all the way through to large companies with international shareholdings.

[3] Miners on the West Coast and throughout New Zealand produce a [variety of minerals](#) via a [range of methods](#). This includes gold from alluvial and hard rock deposits, sub-bituminous coal as a source of energy for food production and space heating, bituminous coal for steelmaking, aggregates and gravels for roading and construction, limestone for fertiliser, pounamu (often as a by-product of gold mining), and mineral sands producing industrial minerals and rare earth elements.

[4] In 2023 the GDP of the West Coast region was about \$2.6 billion NZD. When breaking this down by sector (using the [ANZSIC](#) system) mining was the third largest source of GDP in the region (see Appendix 1), accounting for \$217,900,000, or 8.4% of the total.

[5] Mining is among the highest-paid sectors in the New Zealand economy. In most of the past 15 years it has ranked as the highest paying sector in the country. In 2023 the annualised average earnings for the sector were **\$94,276**, third after finance and insurance services (**\$117,260** per annum) and information, media, and telecommunications (**\$100,204** per annum). See Appendix 2 for further information.

[6] In 2023 Māori working in mining earned higher incomes than Māori working in any other sector in New Zealand, with annualised average earnings of **\$102,856** (see Appendix 3). This was one of several sectors in which average Māori earnings were higher than the workforce in the sector overall. Of all sectors in New Zealand, the workforce in mining has the highest proportion of people identifying as Māori (see Appendix 4), recorded at 32% in 2023.

## This submission

Minerals West Coast welcomes the opportunity to submit on “[A draft minerals strategy for New Zealand to 2040](#)” (strategy).

This is the most significant initiative for the minerals sector in New Zealand since the amendments to the Crown Minerals Act in 2013. It is important that this is a well-considered and enduring document.

Minerals West Coast's submission is structured as follows:

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## KEY POINTS FOR THIS SUBMISSION

- Minerals are fundamental to human existence and prosperity – it is therefore fitting for New Zealand to have a minerals strategy, and an action plan
- Development of exploration and mining projects hinges on access to land, access to labour, and access to capital. If access to any one of these three factors of production is compromised, the other two factors cannot be put to use
- Miners and explorers require fit-for-purpose regulation to enable the above. New Zealand's existing regulatory settings are not fit-for-purpose
- Miners and explorers also need access to geological data and other information, and good infrastructure, especially in regions with mineral prospectivity. Here, New Zealand is advancing
- Miners and explorers need streamlined access to international financial markets, and skilled labour



- The value chain starts with academia and research institutions, education and training, flowing through to the wide range of careers in the industry – New Zealand needs a plan for resilient labour capability and capacity
- Also to support the above, New Zealand needs a minerals research strategy
- Recognition of minerals exploration, mining and processing as responsible activities, and providing jobs and economic activity, which can have a significant benefit in mining regions of New Zealand
- New Zealand enjoys the rule of law, strong human rights, low corruption, a generally favourable business environment, and offers a good lifestyle
- The above story can be told with a high-quality, and well-presented minerals strategy

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### Over-arching commentary

Minerals are fundamental to every aspect of human existence. This proposition is almost so obvious it may seem ridiculous to take any pains to prove it.

In producing a *Minerals Strategy*, Minerals West Coast asks this government to consider the purpose of such a strategy. Who is the audience for this strategy, and what will that audience gain from reading this strategy versus if they did not read it?

Minerals West Coast submits that this document needs to provide existing and potential miners and explorers with an outline of New Zealand's known mineral opportunities. The strategy, therefore, should meet the standard expected of a prospectus for investment. It should provide existing operators in New Zealand with the confidence to continue investing.

Government is a further audience. The strategy needs to have enough substance to drive government's commitment to promoting and enhancing a responsible industry, and one that is important to New Zealanders' prosperity and wellbeing.

Twisting the dials on existing policy and regulation will not cut it. There is a call for major reform and original thinking, if New Zealand is serious about playing its part in the global minerals economy, and in leveraging opportunities for prosperity in New Zealand.

Consider in addition the merits of New Zealand as a country: they include but are not limited to an educated workforce, infrastructure, low levels of corruption, and the transparent rule of law.

More jobs and exports are certainly part of what a strategy and action plan should achieve. More importantly, the strategy should ensure that New Zealand is open for business in minerals exploration and mining, in every sense.

## WHAT IS A STRATEGY?

A strategy is more than an action plan. A strategy contains the following elements:

- **Vision** – eg a thriving minerals industry in New Zealand that contributes to New Zealanders' wellbeing. The strategic pillars flow from the vision, and we need to add a fourth – one that relates to a responsible industry.
- **Problem definition** – previous governments implemented negative policies borne of ignorance and ideological conviction, that ignored the fundamental importance of a minerals industry, and the result was heightened sovereign risk for investment in New Zealand.
- **Gap analysis** – New Zealand would have to be one of the most challenging jurisdictions in which to invest in minerals activities, given our overseas investment, mineral rights, environmental, and nature conservation legislation, none of which is fit for purpose.
- **Objectives / desired outcomes** – eg an industry that has access to land, skilled labour and capital, as well as to fit-for-purpose regulation, research and infrastructure, and wide recognition of the industry as important to New Zealand, and also as sustainable and responsible
- **Action plan** – this flows from the above

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## ACTION PLAN: RECOMMENDATIONS

Missing from the strategy are the following actions that should be listed (refer also to detailed comments below):

- Restructure NZP&M into an effective and efficient regulator; it's not enough to speed up permitting; there is also fairness of process to consider
- Review the Crown royalties regime to ensure that New Zealand is a competitive destination for investment in minerals activities, as the key criterion
- Makes explicit reference to the wider economic benefits to New Zealand of exploration, mining and quarrying, beyond Crown royalty payments
- Review the Department of Conservation's performance as a minerals regulator, for effectiveness and efficiency
- Repeal the Wildlife Act 1953 because: the Act is archaic, superseded by the Conservation Act 1987, and any relevant matters can be addressed under other legislation, eg the Resource Management Act 1991
- Insert definitions of minerals and mining and other minerals activities from s2, Crown Minerals Act 1991 into s2, Conservation Act, to eliminate the need for minerals explorers or miners to apply for a concession to operate on



conservation land, because minerals proponents are already subject to land access arrangement provisions under the Crown Minerals Act 1991

- Review and reform the Resource Management Act 1991, as per the government's policy direction, to provide for all minerals proponents, in addition to the developing fast-track approvals legislation
- As part of the above, amend national policy statements and other national direction in relation to freshwater management, and indigenous biodiversity, for workability – which is underway
- Classify minerals exploration as a permitted activity, subject to standard conditions, to incentivise drilling
- Remove climate change considerations from the RMA, and focus action on this issue under existing, bespoke legislation and secondary instruments
- Amend the Exclusive Economic Zone and Continental Shelf (Environmental effects) Act 2012 for workability, and to be fit for purpose, in light of the failure of the Act to grant marine consents for seabed mining in the EEZ
- Review the Overseas Investment Act 2005 against similar legislation in like-minded overseas jurisdictions, to allow mining projects in New Zealand the access to the capital required for projects to be developed
- Amend the access arrangement provisions and s76 on compensation in the CMA to modernise language, and for fitness for purpose
- Amend the CMA generally for fitness for purpose, and to be effective and efficient
- Legislate to prevent banks and insurance companies refusing to provide services to mining companies, in particular, coal mining companies, to ensure adequate competition in these services in New Zealand
- Review the remit and objectives of Crown research institutes, as regards research into economic minerals
- Review the government funding system for research and development into minerals activities
- On the above, list mechanisms for achieving improvements, eg a minerals research strategy, a labour market strategy
- Take a holistic approach to environmental protection, nature conservation, and minerals activities, taking into account the following:
  - Mining is a temporary use of land, and during and after mining, land can be rehabilitated into a former, enhanced or a new use, in consultation with iwi and others in the broader community
  - In relation to indigenous biodiversity, develop a new effects management hierarchy for use in consenting – avoid, reduce, remedy, mitigate, and offset / compensate for residual effects – including by engaging with industry



- Encourage minerals organisations to undertake sustainability reporting, and / or to develop ESG policies (to be then implemented), and / or product stewardship (eg aggregate and other industrial minerals)
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## A SCENE SETTER – EXAMPLE TEXT

The strategy needs a block of text to set the scene, example text below:

Minerals have been fundamental to human existence for millions of years. It is believed *Homo sapiens'* ancestor *Homo habilis* began using basic stone tools as long as 2.6 million years ago. This relationship with minerals has strengthened and deepened ever since, as we, *Homo sapiens*, have evolved from other ancestors.

In modern times, archaeologists have divided human history based on the increasing level of command over minerals: the Stone Age, the Bronze Age, and the Iron Age.

The ancients knew of nine metals or metalloids – copper, silver, gold, tin, lead, mercury, iron and nickel (from meteorites), and sulphur.

Human endeavour has since coaxed dozens of useful metals and metalloids out of the rocks and waters in which they lay hidden.

Without these, the Industrial Revolution could never have happened, and nor could modern society have developed, including in New Zealand.

Indeed the first peoples of Aotearoa, the Polynesian ancestors of modern Māori, saw fit to name the South Island *Te Wahi Pounamu* (the place of greenstone), now *Te Wai Pounamu* (the waters of greenstone), due to the economic, cultural, and spiritual significance of the mineral within historic and modern Māori culture.

Minerals are now used in a vast array of applications that no one at the time of their individual discovery could have imagined. For example, gold was sought after for its beauty; today it is also a routine component of information and communications technologies (ICT), including GPS satellites.

Any nation lacking the minerals its people need or desire will therefore import what cannot be domestically sourced. This will render the people of that nation reliant on related supply chains. New Zealand is among countries that imports most of its mineral requirements, either as raw materials, or intermediate or finished products.

New Zealand produces domestically for our own requirements:

- Aggregate – for construction and infrastructure
- Limestone – for cement manufacture, as a soil conditioner, aggregate, and to make lime products, having many uses
- Zeolite – livestock health (hoof-friendly farm races)
- Ironsands – iron and steel manufacture



- Sub-bituminous coal – iron and steel manufacture, heat energy for diverse industrial processes, hothouse horticulture, and to heat commercial buildings

New Zealand could develop for domestic consumption:

- Natural pozzolans, which are high-silica volcanic ash deposits to produce low-carbon partial substitutes for cement in concrete
- Kaolinite clay deposits for the above purpose
- Rock phosphate for fertiliser

To continue to produce the above minerals responsibly, the industry needs:

- access to land, labour, and capital
- fit-for-purpose regulation to enable the above, and to ensure responsible exploration, mining and minerals processing
- systems for related education, training, and research and development

New Zealand also exports minerals, including gold, silver, coking coal for steelmaking and advanced materials manufacture, ironsands for steelmaking, and halloysite clay for making porcelain. The first shipments of West Coast heavy mineral sands concentrate are underway, based on ilmenite, which contains titanium, eg for use as a white pigment.

Our country could be an exporter of the following minerals, provided the industry is able to explore for, and / or develop them for export into global supply chains and markets:

- Vanadium (in ironsands concentrate) – New Zealand could become one of the world's largest producers of this critical mineral for high-strength steel, and large-scale battery storage
- Copper – a seabed resource in the Kermadec volcanic arc, many uses, and vital to the low-emissions transition
- Tungsten – a tough and heat-resistant metal having many uses
- The list goes on and the strategy mentions some of them, eg lithium, zirconium, rare earth elements, industrial garnet, some more plausible than others, eg a suggestion of adding bismuth, chromium and nickel

To realise these opportunities, New Zealand needs the same key factors for success as identified above. This strategy and action plan are essential for achieving that success.

Note that economic mineral deposits are fixed in their location and are dependent on the underlying geology. In many cases, they are scarce in their distribution. Before they can be mined, they must first be discovered.

Prospecting and exploration add value to the minerals economy by creating information (besides employment, purchases from suppliers, taxation and other regulatory obligations, which mining also provides). A minerals explorer desiring to sell their permit or interest to another is primarily selling information/intellectual property, which has a value. If this information is encouraging, then it also has value in raising capital for more investment. Attached to this activity is financial



risk, against potential financial reward. Regulation needs to recognise and provide for the foregoing, e.g. permitted activity status for exploration, recognising that exploration is fundamental to the long-term viability and expansion of the mining industry.

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## STATEMENT ON THE REGULATORY ENVIRONMENT

Missing from the strategy is a brief explanation of the regulatory environment governing minerals activities. Its inclusion is necessary to provide context for the reader and users of the strategy, and to highlight the unnecessary regulatory duplication the industry faces, and the need for sweeping regulatory reform. This is part of the problem definition that the strategy should seek to address.

**Crown Minerals Act 1991** – *Permits* for the right to prospect for, explore or mine Crown-owned minerals, ie the “statutory minerals” which include all gold and silver, and minerals on Crown land or alienated from the Crown under certain statutes. The regulator is New Zealand Petroleum & Minerals, a business unit of the Ministry of Business, Innovation and Employment.

*Access arrangements* to Crown land to provide access for a private purpose to land owned by all New Zealanders, whereby consideration is also given to relevant governing legislation for that land, eg the Conservation Act 1987. The regulator is NZP&M, and the relevant landowning government department, eg DOC, or Land Information NZ.

*Royalty payments to the Crown* are required for the mining of certain minerals. Note that the bulk of the direct economic benefit to New Zealand comes through jobs, procurement from local suppliers, the use of the product where relevant, as well as taxes, fees and other charges.

**Resource Management Act 1991** – *Resource consents* for managing actual or potential environmental effects of minerals activities. The regulator is the relevant regional council and district council, or unitary authority, unless a project is referred directly to the Environment Court or called in by the Minister for the Environment to a Board of Inquiry, administered by the Environmental Protection Authority.

**Conservation Act 1987** – *Concessions* for ancillary minerals activities on public conservation land, eg helicopter movements to support exploration, haul roads to support mining, or accessing marginal strips. The regulator is the Department of Conservation.

**Wildlife Act 1953** – *Authorities* for live capture and moving of “wildlife”, eg kiwi, weka, species of lizard or land snail, for later return into suitable habitat. (In certain cases, such may require additional approval under the Animal Welfare Act 1999.) The regulator is DOC.

**Heritage New Zealand Pouhere Taonga Act 2014** – *Archaeological authorities* for modifying or destroying heritage, which in the case of minerals activities is often the leavings of historic mining. The regulator is Heritage NZ Pouhere Taonga (formerly the NZ Historic Places Trust).





**Overseas Investment Act 2005** – *Approvals* for foreign investment in New Zealand subject to criteria including the bona fides and track record of the investor, and that the investment will deliver significant benefit to New Zealand. The regulator is the Overseas Investment Office, a business unit of LINZ.

**Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012** – *Marine consents* for seabed minerals activities in New Zealand's EEZ and continental shelf jurisdiction (analogous to the RMA system on land and out to the 22-kilometre limit of the territorial sea). The regulator is the EPA.

**Marine Mammals Protection Act 1978** – Requirements to observe and document sightings of, and to not disturb marine mammals within New Zealand's marine jurisdiction. As well, to observe restrictions on minerals activities within marine mammal sanctuaries. The regulator is DOC.

As for other land-using businesses, there are also requirements under the Building Act 2004, Health and Safety at Work Act 2015, as well as business and commerce-specific legislation.

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## A NOTE ON CRITICAL MINERALS

Every mineral, at one time or another, has met a definition of “critical”, measured in terms of pivotal economic benefit, and heightened supply chain risk. What is today not critical may become so in the future.

In New Zealand, the notion of critical minerals would apply equally to the following spheres of activity:

- Imports for domestic use, as raw materials, or as intermediate and finished products
- Imports for domestic processing and export, eg aircraft-grade aluminium
- Domestic prospectivity and production for domestic use
- Recycling of mineral products into useable minerals, and new products, eg rolled steel and steel roofing
- Exports, into markets from which we may buy intermediate or finished products
- Exports, to like-minded nations which face geopolitical risk

Some minerals could be termed “sub-critical”, eg silver. Of this metal and certain other mineral, the US Department of the Interior has said, “They are similar to critical minerals in that they are indispensable to a modern society for the purposes of national security, technology, infrastructure, and energy production (both fossil fuels and renewables)”.

Note that the two previous governments classified domestically mined coal for industrial process heat as an “essential service” and as a “key utility” during successive Covid lockdowns. Such coal would meet the definition of a critical mineral.



Taking the above together, a minerals strategy should provide the same rationales, encouragements and actions for all minerals, and not discriminate between one type of mineral, deemed critical at a point in time, and another mineral.

It is also worth noting that through the simple mechanism of market prices, when demand outstrips current supply, prices will rise for any given mineral, signalling to producers to increase production where it is profitable to do so, and for consumers to reduce consumption or find cheaper substitutes, where it is profitable to do so.

Having said that, Minerals West Coast recognises that the concept of “critical” is at least symbolically important, and worth capturing in a reviewable list. It is a reminder to all New Zealanders that life without minerals would be scarcely possible, or at least much more difficult.

A further point is that while many minerals are recyclable, the supply from this source, the economics and future demand combine to ensure an ongoing role for primary mining, and, therefore, the need to ensure provision for it.

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#### **A NOTE ON CONSERVATION LAND**

Around one-third of New Zealand, or 8.8 million hectares, is classified as public conservation lands and waters administered by the Department of Conservation, on behalf of *all New Zealanders*.

This land varies in legal protection from stewardship areas, which are managed for their natural and historic resources, to national parks, which are managed under the National Parks Act 1980, and which are all but off-limits to minerals activities (under Schedule 4 of the CMA). National parks occupy close to half the total area of conservation land.

For more information on stewardship land, refer to a 2015 report of former Parliamentary Commissioner for the Environment, Dr Jan Wright, carrying the short title, [The case of stewardship land](#)

This report reminds New Zealanders that stewardship land contains a wide variety of conservation values from place to place, including areas of very high such values. This is true of conservation land generally, and is not a recent revelation.

For this and other reasons, the government in 2005 published two General Policies under the Conservation Act, one for conservation, and one for national parks.

The key concept the General Policies introduced was “place-based” management, ie managing each area of conservation land on the basis of the values in that land. This approach supersedes land classifications (except for conservation land covered under the National Parks Act, or the Reserves Act 1977).

Therefore, it does not matter whether a piece of land is stewardship land or conservation park; what matters are the values in that land when considering human activities, such as provision of huts and tracks, or of biodiversity conservation, or heritage protection, or private use of public land (eg hydro schemes, skifields, hotels, roads, mining and quarrying).



Of relevance to this strategy is that conservation land is over-represented in terms of minerals “prospectivity” and mineral resources. Why is this so?

New Zealand’s geology is often mountainous, and the geological processes that formed the mountains are related to the processes that formed the economic mineral deposits, eg by bringing mineralisation closer to the earth’s surface for discovery and development. The term “ore” is derived from the Greek word for mountain, *oros*.

Mountains often coincide with conservation land, because in all countries, human settlement tends to occur in the areas which are flat and fertile. Land set aside for conservation is (largely) that which is steep and less suitable for human settlements and agriculture. As a result, there is a strong positive correlation between the location of conservation land, and the location of minerals prospectivity and resources.

That being the case, and outside of Schedule 4 land, a minerals strategy must provide for both access to minerals for minerals proponents on conservation land, and managing that same land for its conservation values, eg biodiversity.

In this, it is important to move beyond the language of trade-offs. Mining today occupies **0.04%** of the area of conservation land, analogous to ***1 millimetres of a 87 ? metre tape measure***. The footprint and impact of mining on conservation land, seen as a whole, is minuscule. As well, during and after mining, land is rehabilitated as best as practicable, with time doing the rest. New Zealand has many case studies of successful environmental management at former and existing mines and quarries, including on conservation land, or where conservation values are concerned. Further commentary on the issue of mining on conservation land can be found in a 2010 report by Parliamentary Commissioner for the Environment titled [\*Making difficult decisions} mining the conservation estate\*](#).

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## THE SOCIAL CONTRACT

Government has the role of providing enabling settings for minerals activities, and for ensuring these activities are carried out responsibly.

For their part, minerals organisations comply with the law, and are environmentally and socially responsible, as is the case for any other regulated economic land use.

One way of being responsible is to be open and transparent about commitments to sustainability. This can take various forms. The quarry sector developed a sustainability road map, and a set of environmental, social and governance (ESG) policies that industry association members can use. It is developing a third-party verified life cycle assessment for New Zealand aggregate and sand products. Individual companies do sustainability reporting, or have ESG policies to which they are committed.

An industry that is demonstrably responsible makes it much easier for a government to enable that same industry.

## DETAILED COMMENTS

The strategy is built on 3 key pillars, which should be listed near the top of the strategy instead of buried in the text: “enhancing prosperity for New Zealanders, demonstrating the sector’s value, and delivering minerals for a clean energy transition”.

We propose an extra pillar: “enhancing responsible minerals exploration and mining, in recognition of competing values in the land and how they are managed”.

### Page 3

The export-led growth pathway is fine; however, we suggest also taking some account of the reality of minerals exploration, mining, minerals processing, and use in finished products. Refer to the scene-setter above.

For its part, the industry would wish to see enhanced minerals prospectivity in New Zealand, and being enabled to add value to that prospectivity, by improving data and other information, and by developing economic mineral deposits.

### Page 4

Referring to the diagram of current minerals production: zeolite near Rotorua is missing; so is silver from Waihi gold mining.

### Page 5

Referring to the diagram on new minerals opportunities, we ask if hydrogen is a mineral.

With reference to potash in Marlborough and Canterbury, we ask if these are bentonite clay deposits. It would be useful to know, because bentonite has a range of uses.

Vanadium from seabed mining should be a separate case study, because of New Zealand’s potential to enter global supply chains as a major producer. It could accompany the one for antimony.

We note the absence of tungsten, and of natural pozzolans in the Central North Island (low-carbon cement replacement).

We suggest adding reference to the Kermadec volcanic arc, and to include copper.

### Page 6

Why do we need a minerals strategy? See above for our suggestions of what a strategy is.





The challenges need to flow from a scene-setting introduction outlining the case for minerals – see above.

A good list of challenges. Missing are: research & development, education and training, and funding for that, to build and retain a critical mass of skilled people.

Also, to note the lifestyle benefits of working in New Zealand in the mining industry, compared with many jurisdictions overseas. This may be part of content related to attracting investment into New Zealand.

## **Page 7**

The section on informed choices should include aggregate.

We suggest strengthening the section on iwi and hapū by highlighting career opportunities for Māori, and to note that Māori are already strongly represented in the industry (see Appendix 4 of this submission).

We suggest mentioning the potential for some coastal iwi and hapū to gain customary marine title under the Marine and Coastal Areas Takutai Moana Act 2014.

## **Page 8**

### **Action 2**

Refer to the note on critical minerals, above. All minerals need a preferential pathway, whether they are critical or not.

### **Action 3**

Remove regulatory duplication, eg repeal the Wildlife Act, and eliminate the need for concessions for minerals activities on conservation land under the Conservation Act. Refer to the note above on the current regulatory context, and to the list of recommended actions, above.

### **Action 4**

Add to the content under this heading material on the need for people in academia and research, a flow through of students, education and training staff.

### **Action 6**

Explore the potential for minerals companies to undertake life cycle assessments, green certification and supply chain verification (where this makes sense), as part of gaining public confidence, along with developing ESG policies, and sustainability reporting.

Telling the story of how minerals impact every part of our lives is important – refer to our suggested scene-setting in the strategy.

### **Action 7**

Amend the Overseas Investment Act to enable responsible minerals investment.



Ensuring attractiveness for investment includes appropriate royalty settings. It is not sufficient to make a comparison of the rates for jurisdictions such as Canada and Australia. Other factors need consideration to incentivise the international minerals investment dollar to come to New Zealand.

## Page 10

The measuring success section is good, however, needs more thought.

For example, we can track levels of overseas minerals investment in New Zealand, over time.

We suggest adding more granularity around desired outcomes, and developing KPIs for review and evaluation of progress on strategy implementation, including on topics such as:

- Better access to minerals
- More publicly available data based on research
- More investment
- More New Zealanders in training and in work – critical mass of labour
- Resilience in the education and research sector
- Better regulation
- More evidence of the sustainability credentials of minerals companies
- More public confidence in the sector's social and environmental responsibility
- More recognition of mining's role in regional development

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## SPECIFIC QUESTIONS AND ANSWERS

MBIE's questions	Minerals West Coast comment
Question 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?	Add a pillar on responsible minerals activities, and to enable the management of competing sets of values in the land – refer to the content on “what is a strategy”, above.
Question 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?	Refer to the main text for additional actions for MBIE to consider.
Question 3: Are there opportunities for our minerals sector we haven't considered?	Note our comments above on the Kermadec volcanic arc, and in respect of vanadium, tungsten, copper, and natural pozzolans.
Question 4: Are there challenges for our minerals sector we haven't considered?	A significant omission is the value chain of people in the industry, and the role that academia and research institutions play in that, and the need for this to be adequately scoped and funded.



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

- A scene setter to provide context
- A summary of existing regulation
- Specific content on critical minerals, conservation land, and the social contract
- Ensure the strategy has high production values, and is well presented

## Appendix 1: West Coast GDP by sector 2023

Industry	Level	Share of total
Electricity, Gas, Water and Waste Services	\$364m	14.00%
Agriculture, Forestry and Fishing	\$358.3m	13.80%
<b>Mining</b>	<b>\$217.9m</b>	<b>8.40%</b>
Construction	\$188.8m	7.30%
Manufacturing	\$158.5m	6.10%
Health Care and Social Assistance	\$155.3m	6.00%
Accommodation and Food Services	\$105.3m	4.10%
Retail Trade	\$104.4m	4.00%
Transport, Postal and Warehousing	\$85.2m	3.30%
Rental, Hiring and Real Estate Services	\$79.3m	3.10%
Professional, Scientific and Technical Services	\$68.2m	2.60%
Public Administration and Safety	\$62.1m	2.40%
Education and Training	\$48.6m	1.90%
Arts and Recreation Services	\$45.6m	1.80%
Wholesale Trade	\$41.8m	1.60%
Administrative and Support Services	\$40.6m	1.60%
Other Services	\$29.3m	1.10%
Financial and Insurance Services	\$28.4m	1.10%
Information Media and Telecommunications	\$24.1m	0.90%
Owner-Occupied Property Operation	\$190.2m	7.30%
Unallocated	\$198.3m	7.60%
<b>Total</b>	<b>\$2,594.10m</b>	<b>100%</b>



## Appendix 2: Annualised mean earnings by sector (New Zealand) in 2023

Sector	Mean earnings per annum 2023 in NZD
Financial and Insurance Services	\$117,260.00
Information, Media and Telecommunications	\$100,204.00
<b>Mining</b>	<b>\$94,276.00</b>
Electricity, Gas, Water and Waste Services	\$91,988.00
Professional and Administrative Services	\$89,908.00
Public Administration and Safety	\$89,908.00
Wholesale Trade	\$83,980.00
Rental, Hiring and Real Estate Services	\$83,044.00
Transport, Postal and Warehousing	\$79,300.00
Construction	\$76,180.00
Manufacturing	\$75,660.00
Total All Industry Groups	\$74,204.00
Health	\$68,380.00
Not Specified	\$66,040.00
Education and Training	\$65,104.00
Art, Recreation and Other Services	\$65,000.00
Agriculture, Forestry and Fishing	\$64,116.00
Retail Trade and Accommodation	\$46,436.00

### Appendix 3: Annualised mean Māori earnings by sector (New Zealand) in 2023

Sector	Mean earnings per annum 2023 in NZD
Mining	\$102,856.00
Financial and Insurance Services	\$97,344.00
Public Administration and Safety	\$89,596.00
Rental, Hiring and Real Estate Services	\$86,320.00
Professional and Administrative Services	\$77,532.00
Electricity, Gas, Water and Waste Services	\$76,024.00
Wholesale Trade	\$76,024.00
Information, Media and Telecommunications	\$73,996.00
Not Specified	\$73,008.00
Construction	\$72,852.00
Transport, Postal and Warehousing	\$70,304.00
Manufacturing	\$69,940.00
Total All Industry Groups	\$67,496.00
Education and Training	\$64,168.00
Health	\$64,168.00
Art, Recreation and Other Services	\$59,956.00
Agriculture, Forestry and Fishing	\$56,628.00
Retail Trade and Accommodation	\$39,884.00

## Appendix 4: Percentage of workforce identifying as Māori by sector 2023

Sector	Percentage of workforce identifying as Māori 2023
Mining	32%
Electricity, Gas, Water and Waste Services	21%
Agriculture, Forestry and Fishing	20%
Construction	19%
Manufacturing	18%
Public Administration and Safety	17%
Transport, Postal and Warehousing	17%
Not Specified	17%
Art, Recreation and Other Services	16%
Retail Trade and Accommodation	15%
Health	15%
Education and Training	15%
Total All Industry Groups	15%
Wholesale Trade	11%
Rental, Hiring and Real Estate Services	11%
Information, Media and Telecommunications	11%
Professional and Administrative Services	10%
Financial and Insurance Services	10%