National Council of Women of New Zealand
Te Kaunihera Wahine o Aotearoa

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MAKING EQUALITY REALITY

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S24.11

Submission to Ministry of Business, Innovation and Employment on the Proposed Minerals Strategy to 2040

Introduction

1. The National Council of Women of New Zealand, Te Kaunihera Wāhine o Aotearoa (NCWNZ) is an umbrella group representing around 60 affiliated organisations and 300 individual members. Collectively our reach is over 200,000, with many of our membership organisations representing all genders. NCWNZ has 13 branches across the country.

2. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership (meeting United Nations (UN) Sustainable Development Goals (SDGs) [1] Goal 17), with others, seeks to realise its vision of gender equality because it is a basic human right[2].

3. This submission has been prepared by the NCWNZ Climate Change and Environmental Sustainability Action Hub and the Parliamentary Watch Committee after consultation with the membership of NCWNZ. It draws on the knowledge, research and expertise covering 126 years of NCWNZ policy[3] and submissions[4] on issues endorsed by the membership, including the impacts of climate change.

Executive Summary

4. NCWNZ supports that Aotearoa New Zealand Government signed the UN General Assembly Resolution 70/1 (2015) - **Transforming our world: the 2030 Agenda for**

[1] https://sdgs.un.org/goals
[2] https://www.ncwnz.org.nz/resolutions
[3] https://www.ncwnz.org.nz/submissions
[4] Written (and Oral) Submissions including and referenced in this document:
S21.17, S21.17 Inquiry on the Natural and Built Environment
S23.17, S23.17 Inquiry into Climate Adaptation
S23.19 Developing a Regulatory Framework for Offshore Renewable Energy
S24.08, S24.08 Fast Track Approvals Bill 31-1

Sustainable Development[5] and the **Political declaration of the high-level political forum on sustainable development convened under the auspices of the General Assembly** September 2023[6] to the United Nations Sustainable Development Goals (SDGs).

5. NCWNZ acknowledges the progress against the observations and recommendations of the Committee on the Elimination of Discrimination against Women (CEDAW)[7], and in identifying the commitments under the updated Nationally Determined Contribution (NDC), 4 November 2021[8] and the recent Universal Periodic Review (UPR) 2024.

6. NCWNZ members strongly believe the proposed Minerals Strategy (the Strategy) creates challenges to the law, democracy and the environment. The proposed strategic pillars lack balance with the emphasis on the economic proposition and little consideration for environmental protection and sustainability.

7. As reported by SGU Geological Survey of Sweden it requires specialist knowledge and experience to understand the full ramifications of the work associated to opening and closing a mine, from the exploration through to reclamation of land.

8. The PDP Report of 2015[9], noted the ecological damage around the area and the streams that were impacted by the Tui Mine, Te Aroha and 75 years on, the natural ecological and native species have not reestablished as a direct result of the high levels of contamination following the mine closure.

9. New Zealand commitment to international agreements in respect to the Paris Agreement, climate change, the Sustainable Development Goals and CEDAW, plus its own Acts on Climate Change (Zero Carbon) and Emissions Trading Act have not been addressed in this proposed Minerals Strategy.

10. Consideration is needed on the impact on/considerations for women, both through employment (the construction and mining sectors are least represented with women employees) and the high levels of bullying and harassment in Aotearoa New Zealand (reported second in the world for this statistic). The impact on wāhine Māori, their loss of voice, and access to natural food resources in their areas must be considered.

11. The socio-economic, environmental and financial impact in the long-term, for the exploration, development of areas for mining, through to their 'short-term operation' to their closure and reclamation of land all impact on women and girls.

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[5] https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_RES_70_1_E.pdf

[6] https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_RES_70_1_E.pdf

[7] https://www.ohchr.org/en/treaty-bodies/cedaw

[8] https://unfccc.int/sites/default/files/NDC/2022-06/New%20Zealand%20NDC%20November%202021.pdf

[9] Tui Mine: Post Remediation Ecological Monitoring 2015 (waikatoregion.govt.nz)

Strategic pillars and key actions

Pillar: Enhancing prosperity for New Zealanders

12. NCWNZ members recognise the importance of pursuing economic gains for the nation, regions and communities. However, they question the true economic benefits for the vast majority of New Zealanders from implementing the strategy as proposed.

13. Economic prosperity is through some government royalties (2%) and a small taxation income imposed on foreign mining companies working in New Zealand. There is limited prosperity for New Zealanders with shares in these overseas mining company (like Oceana and Bathurst).

14. The forecast for an increase in mining jobs needs to be carefully considered in light of the nation-wide skills that are available or can be developed, rather than importing the skills from elsewhere.

15. As has been reported, the construction industry still has a skills shortage, and the mining (and energy) industry has the lowest representation of women across all areas of this sector.

16. As an advocate of equal opportunity, NCWNZ sees minimal advantages arising from the strategy for women and for Māori whānau /hapu. There is little direction on how these communities might be safeguarded and included in decision making and decent jobs.

17. Members are concerned about the any negative effect of mining on tourism, hospitality and service workers many of whom are women.

Pillar: Demonstrating the sector' value

18. NCWNZ members feel there that the sector's value has not been clearly demonstrated or is of less economic value than stated. The strategy is business-oriented in particular towards international investors. We recognise the challenges that can occur where mineral operations are owned and funded by international companies and industry giants.

19. Members shared examples of the damage and costs in their regions as a result of mining such as the Waihi sink holes:

    - 13/12/2001, under an occupied family home a 50m wide and 15 metres deep sink hole formed, over an old underground mine[10], results a whole subdivision was evacuated, houses removed and area now a paddock.[11]

[10] https://www.nzherald.co.nz/nz/family-unhurt-as-house-falls-into-a-hole/J4EDQSKZZUDOVU3KMVOCEOXIOM/

[11] https://www.sunlive.co.nz/news/161459-waihi-sinkhole-being-filled.html

- 30/08/2017 a 20 diameter sink hole that appeared near the Waihi Rugby Club and the Martha open pit, was above historic underground mining works. The area had been considered a hazard zone in 2002 and had been previously cordoned off.[7]
- October 2008, Waihi subsidence assessment, GNS Science Consultancy Report 2006/235 had reported on the 'low hazard, long-term creep movements associated with underground and open pit mining'.[12]
- Tui Mine, Te Aroha, (1967-1975) extracting copper, lead and zinc, since its closure there was the release of heavy metal and mining waste (tailing) equating to 135,000 tonnes discharging into natural waterways, creating environmental and risk to local communities. The March 2010 Assessment of Environments Effects put an estimated cost to taxpayers to clean up the contamination to $17.5million. In 2013, at a cost of $22.5 million[13]:

  > Left behind were waste rock and ore dumps, tailings and the ruins of the mine workings. These leached heavy metals and acid into the Tui and Tunakohoia Streams. In addition, there was a risk the tailings mass would liquefy in an earthquake or fail in an extreme weather event and flow down the mountain.
  >
  > Since the clean-up began, the tailings dam has been stabilised and 110,000 cubic metres of old mine tailings have been treated and stabilised. The water quality of the Tunakohoia stream has improved and there is no longer a threat to human health.

- The environmental impact from the tailings assessed at the Tui Mine had destroyed the environmental fauna, flora and unique native wildlife including native frogs and fish … it was noted in the PDP Report of 2015[14]:

  > Although improvements in aquatic health have been observed, abundance and taxonomic richness are still significantly lower in the impacted sites when compared to the un-impacted control sites. This indicates that the community has not yet returned to its pre mine discharge state.

20. Members seek reassurance that government will put in place the necessary preventative measures to ensure New Zealanders are the primary beneficiaries from the excavation of their lands, and that profits are invested back into the country's economy to improve critical public sector interests.

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[12] https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Mining/Waihi-Subsidence/GNSreport.pdf

[13] https://www.beehive.govt.nz/release/225-million-tui-mine-clean-complete

[14] https://www.waikatoregion.govt.nz/assets/PageFiles/13588/Tui_Mine_Remediation_-_Ecological_Monitoring_Report_2015_(3747598).pdf

21. Another suggestion from a group of members is that revenue raised from mining rights and other profits be ringfenced to stay within the sector to mitigate any issues that develop in the future, and to assist in the transition to clean energy.

Pillar: Delivering minerals for a clean energy transition

22. This pillar is seen as more complex as New Zealand does need specific rare-earth minerals like lithium and antinomy (found in gold reserves) for renewable energy expansion (e.g., batteries, IT), and vanadium for reinforcing steel. However, this is at huge cost to our tourism and environmental futures. At the moment tourism obtains 10 times the profits that mining provides.

23. One group of members suggested the need for clarification of and criteria for 'clean energy' as there appears to be a contradiction in terms with a 'clean process' of mining activity. There are soil, rock and waters disturbance, and noise and other disturbances impacting on wildlife and sea creatures, some of which are endangered species.

24. Members question the cost-effectiveness of increasing mining for fossil fuels when this is dramatically more expensive than wind, solar, and geothermal energy production. Instead, fossil fuel mining needs to be phased out and economic resources spent on expanding renewable energy.

Additional pillar: Environmental protection

25. NCWNZ members overwhelmingly support the addition of an environmental protection pillar to ensure the sustainability of the environment – that we are not degrading, exploiting or spoiling it.

26. The current pillars do not allow for the maintenance of New Zealand's clean green environment. There needs to be much deeper thought and planning to ensure that the environment is not irreparably damaged in the haste to access and sell these minerals. Money cannot replace thousands of years of environmental maturity.

27. The impact on how a number of mineral extractions use harmful substances, including arsenic.

    > Arsenic within its natural environment can be found in rocks, soils, including biological materials and impurity in metallic ores and other local mineral deposits. The challenge for the mining industry is to obtain enough production of arsenic to meet economic demands and provide a safe environment with zero arsenic emissions[15].

28. NCWNZ members noted there are no regulations around restoring the natural footprints for overseas companies once they have debased the sea or land. There needs to be cast

[15] https://www.smenet.org/What-We-Do/Technical-Briefings/The-Role-of-Arsenic-in-the-Mining-Industry

iron guarantees that there will be rigid controls in place to avoid leakages into aquifers, ground water, and soil.

29. This pillar would therefore be pro-safety to underscore all measures agreed on if extraction takes place and how any Bonds are held in perpetuity until the natural eco-system has been reestablished.

30. It is acknowledged the technological advancements, are changing the need for the consumerism demand for minerals for electronics and other products, for example

> a single lithium-ion electric vehicle battery pack (a type known as NMC111) uses around 16kg of lithium, 46kg of nickel, 46kg of cobalt and 43kg of manganese ...[16]

It has to be acknowledged the process of mining is intense, invasive and the impact of environmental disasters and change to the ecological and social environments are significant.

31. Where Aotearoa New Zealand is working to achieve the Net Zero Emissions by 2050, which is the pathway to achieve net zero carbon dioxide (CO_2) by 2050 as per the Emissions Reduction Plan[17] and the Climate change Response (Zero Carbon) Amendment Act[18] how will increasing mining across the country achieve these goals when:

- Clearing of natural existing CO_2 sinks in areas highlighted for future mining will result in deforestation, vegetation and organic soils which will release carbon dioxide and greenhouse gases.
- Infrastructure, access, plant equipment and site establishment all create higher CO_2 through its long-term operations, these will have a long-term impact on the local environment and will impact on achieving the obligations to meet net-zero carbon by 2050.

32. An example of one of these key minerals identified on the New Zealand map is lithium. Below are some of the environmental impacts, even with new technologies, this mining process has an impact on:

- Contamination of soil, air, resulting in biodiversity loss and damage to ecosystems
- Carbon emissions, approximately 15 tonnes of CO2 are emitted for every tonne of lithium extracted. This high carbon footprint is…. due to the energy-intensive nature of extract and processing.[19]

[16] https://earth.org/environmental-problems-caused-by-mining/
[17] https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/low-emissions-economy/emissions-reduction-plan
[18] https://environment.govt.nz/acts-and-regulations/acts/climate-change-response-amendment-act-2019/
[19] https://www.greenmatch.co.uk/blog/is-lithium-mining-bad-for-the-environment

33. OceanaGold reported they had produced 0.53 tonnes of CO2e per ounce of gold (2019)[20]. In 2023, OceanaGold[21] reported they had extracted 477,313 ounces of gold (253,976 tonnes of carbon dioxide (tCO_2e)) and 14,172 ounces of copper (which is twice as carbon intensive as steel (4.6 tCO_2e), therefore they had produced 1.89 tCO_2e).

Other considerations

Commitment to Te Tiriti o Waitangi

34. Members noted that there is minimal consideration given to the obligation owed to Māori under the provisions of Te Tiriti o Waitangi, asking for greater clarity on how the principles and practice will be enacted and the extent to which Māori will be involved.

Requirement for specialist expertise

35. As reported by SGU Geological Survey of Sweden there is a requirement for expertise and knowledge specific in this field, with a clear understanding of the phases of mineral mining, from; prospecting and exploration; development; extraction, closure and reclamation[22]

    Mining will change the local environment, it will change the natural landscape, alter water quality, change the visual aesthetics of an environment and the local ecology, sensitive biotopes; biodiversity and land use.

    The **people and society** at the mine, before mining, during mining and after mining, will be impacted by environmental changes directly and indirectly. The impact on people will differ due to economic, cultural and socio-economic dynamics.

36. The Strategy does not identify that for any permit for mining the preparation of an Environmental Impact Assessment (EIA) which has specialist experts who would clearly define the process, and to illustrate the 'magnitude and extent of environmental impact' of any proposed mining project.

37. Commitment is needed for Te Tiriti o Waitangi representatives, women, conversation specialists and environmental scientists be included in all decision making on any mineral's strategy and approvals.

Women, the Mining Industry and its Impacts

[20] https://oceanagold.com/2020/11/27/oceanagold-commits-to-net-zero-emissions-by-2050/

[21] https://investors.oceanagold.com/2024-02-21-OceanaGold-Reports-Fourth-Quarter-and-Full-Year-2023-Operating-and-Financial-Results

[22] https://www.sgu.se/en/itp308/knowledge-platform/3-mining-environment/#:~:text=Extracting%20minerals%20from%20the%20ground,ecology%2C%20and%20change%20land%20use

38. With the Strategy, it discusses the opportunity for employment, but as the current statistics show in Aotearoa New Zealand[23]:

> the construction sector ranks second to last (the last being the mining industry) in terms of women representation, with only 15.8% of women being employed in the construction sector.

39. As the Policy Briefing 8/2020 by The University of Auckland, Mind the Gender Gap: Energy Employment Trends in Aotearoa New Zealand[24]:

- the energy industries are gender segregated, with the most resistant to change
- large differences in job tenure between men and women across the power generation, petroleum and coal manufacturing, exploration and mining

40. Stats NZ report[25] reported the industries with a low representation of women are:

- Mining – 8.71%
- Construction – 13.5%

41. The Intergovernmental Forum on Mining Minerals, Metals and Sustainable Development report on 'Women and the Mine of the Future'[26] which addresses gender-disaggregated employment in the mining sector:

- Mining industry globally employs 75-91% men, 9-25% women
- Women's representation in the industry, is predominantly administrative and supportive roles and little or no representation in leadership, managerial or decision-making positions
- Working conditions not conducive to women's employment, sexist attitudes, harassment and gender-based violence
- Barriers impede women obtaining mining-specific skills and experience
- Gender pays gap is at almost 34%, this was reported in the StatsNZ and Auckland University reports, with the highest drop-off of women employees as a result of the environment and pay disparity.

42. The lack of women and girls in Science, Technology, Engineering and Mathematics (STEM), they make up only 34% of the workforce. The gender gaps are more prevalent in some of the fastest-growing and highest-paid jobs like architecture/engineering (16.5%) and computer science (25.2%)[27].

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[23] https://www.mbie.govt.nz/building-and-energy/building/building-system-insights-programme/sector-trends-reporting/building-and-construction-sector-trends-annual-report/2023/2023-3

[24] https://www.auckland.ac.nz/assets/arts/our-research/research-institutes-centres-groups/ppi/policy-briefings/ppi-briefing-gender-energy.pdf

[25] https://www.stats.govt.nz/infographics/women-in-aotearoa/

[26] https://www.igfmining.org/resource/women-and-the-mine-of-the-future-global-report/

[27] https://www.aauw.org/resources/research/the-stem-gap/

43. Gender impact on women when new mines are opened create additional issues, including loss of cultural rights, transient male work force can result in alcohol and drug abuse, immigration of sex workers and increased violence to women and girls.

International obligations

44. There is no reference to the Paris Climate Accord targets or emission reduction targets or reference to the New Zealand's first Submission under the Paris Agreement of its Nationally Determined Contribution (NDC), 4 November 2021[28]:

- **The Nationally Determined Contribution of New Zealand is**: To reduce net greenhouse gas emissions to 50 per cent below gross 2005 levels by 2030.
- The 2021-2023 NDC target is a responsibility target.

  The 2021-2030 NDC target is economy-wide covering all sectors: energy, industrial processes and product use, agriculture, land use, land-use change and forestry, waste, and all greenhouse gases: CO2, CH4, N2O, SF6, HFCs, PFCs, NF

- Party's implementation plans, including public participation and engagement with local communities and indigenous peoples, in a gender-responsive manner:

  The Climate Change Response Act (CCRA) recognises the Government's responsibility to give effect to the principles of the Treaty of Waitangi. The CCRA requires emissions reduction plans to include a strategy to recognise and mitigate the impacts on Māori, and that Māori are adequately consulted on these plans

- Assumptions and methodological approaches used for accounting for anthropogenic greenhouse gas emissions and removals corresponding to the Party's NDC, consistent with decision 1/CP.21, paragraph 31, and accounting guidance adopted by the CMA:

  New Zealand's accounting for Land use, land-use change and forestry (LULUCF) will be based on a combination of the 2006 IPCC Guidelines for National Greenhouse Gas Inventories and the 2013 IPCC Kyoto Protocol Supplement. New Zealand looks forward to giving future consideration to methodologies introduced by the 2013 IPCC Wetlands Supplement and the 2019 Refinement to the 2006 IPCC Guidelines. ……. Any information on country specific methodologies applied, will be consistent with Article 13, paragraph 7(a) of the Paris Agreement and paragraph 1 (b) of Annex II of Decision 4/CMA.1.

[28] https://unfccc.int/sites/default/files/NDC/2022-06/New%20Zealand%20NDC%20November%202021.pdf

45. New Zealand signed the United Nations Sustainable Development Goals (SDGs) in September 2015 and ratified the resolution A/RES/78/1 on the 29 September 2023[29]:

    1. We, the Heads of State and Government and high representatives, have met at United Nations Headquarters in New York on 18 and 19 September 2023, at the Sustainable Development Goals Summit,[1] [(30)]to review progress and accelerate the implementation of the 2030 Agenda for Sustainable Development

    2. We reaffirm our commitment to effectively implement the 2030 Agenda and its SDGs and uphold all principles enshrined in it. The 2030 Agenda remains our overarching roadmap for achieving sustainable development and overcoming the multiple crises we face. We will act with urgency to realize its vision as a plan of action for people, planet, prosperity, peace and partnership, leaving no one behind. We will endeavour to reach the furthest behind first.

    3. We commit to achieving a world in which humanity lives in harmony with nature, to conserving and sustainably using our planet's marine and terrestrial resources, including through sustainable lifestyles, and sustainable consumption and production, to reversing the trends of environmental degradation, to promoting resilience, to reducing disaster risk, and to halting ecosystem degradation and biodiversity loss. We will conserve and sustainably use oceans and seas, freshwater resources, as well as forests, mountains and drylands and protect biodiversity, ecosystems and wildlife.

46. There is no reference to the International Organization for Standardization (ISO) Certifications, these include as a minimum[31]:

    - ISO 14001 Environmental Management System (EMS)
    - ISO 9000 Quality Management
    - ISO 45001 Occupational Health and Safety
    - ISO 26000 Social Responsibility
    - ISO 31000 Risk Management
    - The Net Zero Guidelines (IWA42:2022)

    The above certifications are required to be reviewed annually by an independent authorised party with these reported back to all stakeholders.

47. The IPCC Special Report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems[32]

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[29] https://documents.un.org/doc/undoc/gen/n23/306/65/pdf/n2330665.pdf?token=iPKdvawKvlxxlzYs5E&fe=true

[30] [1] High-level political forum on sustainable development convened under the auspices of the General Assembly (Sustainable Development Goals Summit).

[31] https://www.iso.org/standards.html

[32] https://www.ipcc.ch/srccl/

A gender-inclusive approach offers opportunities to enhance the sustainable management of land (*medium confidence*). Women play a significant role in agriculture and rural economies globally. In many world regions, laws, cultural restrictions, patriarchy and social structures such as discriminatory customary laws and norms reduce women's capacity in supporting the sustainable use of land resources (*medium confidence*). Therefore, acknowledging women's land rights and bringing women's land management knowledge into land-related decision-making would support the alleviation of land degradation, and facilitate the take-up of integrated adaptation and mitigation measures (*medium confidence*). {1.4.1, 1.4.2}

Maintain the democratic process

48. NCWNZ does not support the Strategy and Plan as they currently stand given our concern on the unprecedented powers of government ministers to approve applications which in the past would have been considered under environmental laws. NCWNZ were one of over 25,000 respondents to the public consultation on the Fast Track Approvals Bill. In our submission[33], we looked critically at the consequences of the Fast Track Approvals Bill which hopes to speed up the 'efficiency' of mining applications.

49. As an organisation NCWNZ supports Aotearoa's good record of public consultation and of not being corrupt. We will continue to challenge any lack of transparency and undermining of the democratic process.

50. Members are disappointed that future decisions on mining operations will be made in spite of past court cases that have been fought and won, often at great expense and hard work of many people, and especially those involving conservation land. Reopening sites where mining applications where quashed by the Supreme Court will compromise the integrity of the Supreme Court and the power of the law.

51. The recently Fast-track resource consent approved for the Australian mine in the Golden Bay, Tasman has not provided an irrefutable protective plan to ensure the precious fresh mineral waters will not have any impact on its long-term sustainability. How will the operation of extracting minerals ensure the protection of the native fauna and flora or the unique natural springs in the area?

Impact on the Oceania-Pacific Region

52. Some members questioned whether the impact on our nearby island nations has been considered in the research and if so whether there is stated intentionally to protect these people, their way of life, their land and natural resources.

53. In April 2024, the government had contributed $41m to support clean energy in South-East Asia, how will this translate to the impact of mining, its production of carbon

[33]NCWNZ Submission on the Fast Track Approvals Bill S24.08 Fast-track Approvals Bill (nationbuilder.com)

dioxide and greenhouse gases, which in turn will impact on our neighbouring Pacific Islands?

Conclusion

54. NCWNZ believes that the proposed Minerals Strategy does not promise a fair and conscientious solution to New Zealand's economic prosperity. While it may attract international investment and the offer of employment for possibly 25% of women, the strategy will not assist Aotearoa New Zealand women and their communities.
55. It does not illustrate how it will deliver on its sustainable development goals or the commitments on meeting net-zero 2050, minimising impact as a result of climate change or the protection of the existing natural environment their biological residents and protection of the natural waterways.
56. It is noted that there is no reference that in areas that suffer from droughts during extreme summer seasons, where mining would be approved, what protection to existing natural water resources and to ensure no loss to the residents in the area.
57. Mining affects women, through being excluded in employment, male domination in this industry and following closures to mines women are affected through loss of employment by their partners and the socio-economic impact in their communities.
58. The government has stated more employment opportunities, financial gains, but at no stage how protection of Māori cultural rights, the protection of women and where are women's voices at the decision-making table.
59. The latest fast-track panel has only 20% of women representation, where our country has over 51% women. How is there to be fair balance of representation on any panel being developed, with the necessary experience to review any application that impacts on our natural environments.
60. If the government wishes to exploit the economic value of the land, then it cannot afford to pay lip service to its environment obligations. It must instead ensure that adequate protections and regulations are in place to avoid species migration and extinction, and irreversible damage to the ecological wellbeing which will occur from mineral exploration across New Zealand.

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