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A. About you

Name:

Tasman District Council

Email address:

Privacy of natural persons

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:

Academic/researcher
below)

Independent expert (please specify

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:

Unitary Authority (local government)

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.

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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?

There is more to consider regarding the identified strategic pillars specifically their description and the need to include other pillars.

Description of pillars

Tasman District Council (Tasman) suggests each of the strategic pillars require clear descriptions. Collectively they should demonstrate how prosperity and a clean energy transition, will be met by careful consideration of the sector's risks and upholding environmental, cultural, social values and priorities at a regional, national, and international level.

International trends and experience need to be followed more closely by New Zealand Tasman asserts, a mineral strategy for New Zealand would better support New Zealand's prosperity by following international trends and associated strategic direction identified for the mineral sector. This includes building circular economies, improving environmental practices, advancing research and technological innovations and honouring partnerships with Indigenous Peoples. The New Zealand Government has an opportunity to benefit from international experience and span our aspirations for our nation's prosperity over a 50-to-100-year period. At the very least this would require having a pillar with a primary focus on the protection of the environment.

The pillars of the Draft Strategy would be best informed by a comprehensive understanding and analysis of how New Zealand's mineral resources, including associated value chains, mining practices and the international setting we are planning to be a part of, will truly benefit prosperity without detrimentally compromising the environment. Mining is heavily dependent on fossil fuel consumption. The effects of these carbon emissions could be recognised within a dedicated environmental pillar.

Evaluation of our current and future consumption and priority technological needs

To ensure New Zealanders benefit from the country's mineral resources, we would need to evaluate and question our current and future consumption and priority technological needs. Do we need to extract virgin resources, or do we need to recycle, reduce, repurpose, reuse, recover what resources are already in circulation or in landfills? Studies to understand the impacts of mining and the supply chains of critical minerals and metals like lithium, nickel, gold etc are revealing, and urge the Government to deep dive into a careful consideration on the essential pillars for a responsible and forward-thinking mineral sector. At the very least New Zealand's strategy should signal costs associated with any environmental damage will not be externalised, with taxpayers or local ratepayers left to hold the bill.

Prioritising an environmental consciousness within the mineral sector should be paramount in the Strategy as this is what local communities, investors and development funds increasingly demand. Having a dedicated pillar to the environment will strengthen our viability and integrity as a player in this sector. This will demonstrate New Zealand's commitment to achieving Sustainability Development Goals and accelerating a circular economy. We need to assess, plan, and prioritise before we act, we have the time to get this right!

Recommendation One:

Government must take a comprehensive approach expanding capabilities across the entire mineral supply chain by:

- 1.1 Including a pillar with a primary focus on the protection of the environment and responsible mineral resource use.**
- 1.2 Including in the description of the pillars, key aspirations to demonstrate how prosperity, the sector's value and a clean energy transition will address the sector's risks and be met by upholding environmental, cultural, social values and priorities at a regional, national, and international level.**
- 1.3 Requiring within the description of the pillars wording like the following that - *All New Zealanders and regional economies will receive equitable benefits from the mineral sector. The sector will add environmental value by adopting environmental***

standards and emerging best practices, led by Environmental Social Governance (ESG) performance commitments with particular attention given to those local communities and Te Tiriti partners most affected by the extension of existing sites or development of new mining sites.

1.4 Requiring within the description of the pillars wording similar to the following that

- New Zealand's mineral resource extraction and use will support benchmark targets, meet the Paris Agreement, achieve the Sustainable Development Goals

(SDGs) and facilitate a clean energy transition. Investments will focus on priority minerals essential for technological advancements in the country. The combined focus on ESG, performance commitments, Paris Agreement, SDGs, and targeted priorities will guide government agencies and New Zealand mineral sector in selecting international partners and countries for collaboration.

1.5 Requiring within the description of the pillars wording similar to the following –

Today's mineral supply and investment plans fall short of what is needed to transform the energy sector, raising the risk of delayed or more expensive energy transitions. A strong focus on recycling, supply chain resilience and sustainability will be essential. We must balance energy-intensive mineral extraction with net-zero 2050 goals, ensuring a sustainable, competitive industry without undue costs or inefficiencies.

Addition of other pillars

Consideration of key challenges and issues identified within the sector worldwide would support better alignment to other international and more advanced mineral strategic direction and priority actions.

Guidance these international trends and standards provide for New Zealand's Strategy

Key challenges: The World Economic Forum (2024)¹ asserts the mineral sector has three key challenge areas which require specific attention: carbon emissions from mining, social and biodiversity impacts, and gaps in circularity. The World Bank² also recognises the serious environmental consequences caused by the extraction of critical minerals and highlights the same issues raised by the World Economic Forum. The World Bank notes that many of the same companies that mine critical minerals also mine environmentally damaging fossil fuels like coal.

The World Bank argues that minimising the environmental impact of the industry, such as the tens of thousands of dams holding mining waste around the world, should be a top priority going forward.

According to Dominic Barton (2024), chair of Australian mining giant Rio Tinto, a major barrier to capital and support is the industry's association with disasters and ecological damage. "To all of a sudden be seen as a critical resource or a saviour is a bit of a stretch".³

¹ [Critical minerals are key to the energy transition. What's needed now | World Economic Forum \(weforum.org\)](https://www.weforum.org)

² [Critical mineral mining crucial for green transition; reputational risks remain \(cnbc.com\)](https://www.cnbc.com)

³ Ibid

Tasman’s research discovered that many international mineral strategies, legislation, and policy frameworks, (e.g. Australia, Ontario, Sweden, Japan, Norway, EU, USA, Chile, Columbia, UK, Korea) reviewed and updated in recent years, include, and elevate as either a standalone pillar, main objective, or key focus area, the following:

- Environmental protection and responsible mineral use.
- Comprehensive management approach to climate change.
- Environmental Social Governance (ESG) leadership.
- Effective indigenous engagement and benefit sharing.
- Circular economy and sustainable development goals (SDGs).
- Prioritising the development of strategic projects.
- Growing a skilled workforce.
- Human rights.
- Recognising gender and differentiated impacts on women.

Tasman believes that the pillars listed above are necessary assurance that New Zealand’s strategy will steer the sector towards contributing to thriving and resilient natural and built environments for present and future generations.

Environmental protection and responsible mineral use pillar

Quality objectives: More mature mineral nations have identified that an increase in production of minerals and metals must be balanced against greater protection of and care for the natural environment. Having environmental protection and responsible production as a key focus addresses matters like land use and values conflicts, waste management, hazardous chemicals, polluter pays principle. Sweden’s Strategy⁴, for example, ties its environmental pillar to quality objectives, such as good quality groundwater (extraction of natural gravel in particular), a non-toxic environment, limited climate impact and a good built environment.

Managing conflicting values: Sweden’s Strategy acknowledges up front that the majority of new mines are planned in areas where there are environments of high natural and cultural value, an active outdoor life and where the Sami have a long tradition of reindeer husbandry. Respecting other values and maintaining a region’s overall attractiveness, where a new mine or infrastructure or expansion of a site or infrastructure is proposed is key to Sweden’s approach and could also be considered a driver of New Zealand’s Strategy. Sweden’s Strategy, for example, requires the mineral sector to seek consensus with other industries and land users.

From a public interest point of view, production should not jeopardise fulfilment of kaitiakitanga, and environmental stewardship strongly advocated for by many New Zealanders. Within areas of local, regional, and national conservation or ecological restoration interest, the mineral sector should be encouraged to add value to an area’s identified value rather than harm it. In Tasman’s experience, it is important to engage in early and enduring dialogue to try and address upfront any conflicts of interest or competing land use. Considering this in New Zealand’s Strategy will potentially aid consensus amongst those promoting and affected by proposed mineral sector’s activities. New Zealand’s Strategy by adding an *Environmental protection and responsible mineral use pillar* would support for example, the consideration of extending or allowing gas extraction, gold or coal mining etc, against a comprehensive consideration of any risks to freshwater, biodiversity or land use values. To ensure long-

⁴ [National Minerals Strategy – Policies - IEA](#)

term local prosperity the Strategy needs to signal the importance of requiring a balance between economic, cultural, and environmental values.

Ecological priorities: Similar to Sweden, New Zealand’s Strategy could establish a framework where soils, land, indigenous vegetation, and water are to be used and protected for the purposes for which they are best suited, this may mean in some areas for ecological purposes only.

Well-designed built environment: Sweden’s Strategy appreciates that the district where mineral extraction occurs, must be able to offer attractive living environments with good access to services, affordable and available housing, and recreational opportunities. Strategic efforts which take a holistic approach to the needs of mineral sector employees and their families increase the likelihood of residency avoiding “fly in/fly out” scenarios. Like Sweden, New Zealand’s Strategy should demonstrate how it supports comprehensive land use and social planning to help the mineral sector work with affected communities, supporting aspirations for local and regional resilience and diversified growth. Coupling environmental protection with responsible production would better signal how comprehensive planning by the mineral sector could lead to development in other sectors and industries in a region.

Royalties: The current financial models are not fit for today’s purpose. The 2% received does not support equitable regional needs. The current models are being driven by a set of general assumptions (for example, exchange rates and discount rates) and a set of mineral- and mine-specific assumptions (for example, commodity prices, capital and operating expenses, tax rules, and freight and decommissioning costs) that need evaluation as part of the strategic direction of New Zealand’s Strategy. It is also important the Strategy signals the purpose of royalties being paid to region are not to manage environmental and social health issues caused by the mineral sector but rather are there to provide for added local prosperity and environmental and social gains.

Waste management: Many of the international mineral strategies have a core focus on waste management for both mineral production and for recycling, reusing those minerals already extracted and being used. Key waste management priority actions are informed by these international strategic mineral frameworks that prioritise collection, reduction, recycling, and treatment of waste, including of waste streams containing critical raw materials. Many introduce more specific requirements to improve the recyclability of permanent magnets in vehicles, to make their waste treatment and recycling easier.

Prioritising waste management in an environmental protection and responsible production pillar signals to the mineral sector that the necessary efforts must be made to improve, for example, New Zealand’s domestic battery supply chain and recycling capabilities, landfill extraction opportunities, management of tailings and chemical waste. Funding opportunities like the above would certainly help New Zealand to address critical battery needs potentially reducing the need in the first instance to extract new sources of critical minerals.

World leadership in ESG performance pillar

A pillar that promotes New Zealand as a world leader in ESG performance, would help to consolidate and communicate both within New Zealand and amongst the mineral sector’s international players a commitment by New Zealand to hold high ESG credentials to maintain social license. To build confidence in the sector, bonds of surety which enshrine the polluter pays principle are essential. The Strategy needs to continue to signal support for regulation that ensures the costs of abandonment, failed ventures

and environmental damage does not fall on a local community and their local authorities. Tasman has had this negative experience in the past with the Fruitgrowers' Chemical Company site in Māpua, once New Zealand's most contaminated site⁵. The pillars must signal the need for strong regulation in alignment with the Strategy to avoid such legacies.

Increased scrutiny of the mineral sector: According to EY (2023)⁶ although top miners are making progress on a range of ESG performance measures, they are under pressure to do more. ESG is attracting more scrutiny from investors and communities. Capital increases are seeing companies grappling to fund expansions and cybersecurity risks are increasing. Miners are more conscious of minimising waste and are investing to meet 2050 net zero goals. ESG performance, however, is becoming more complex and interlinked, which requires an approach that thinks beyond regulation and controlling costs. Investors are requiring assurance that investing in one area adds genuine value rather than causing problems elsewhere.

Net positive impact: Better use of data and a focus on net positive impact are now core requirements for investors and communities. Biodiversity is attracting investor scrutiny, with this attention driving progress toward positive biodiversity. Generative ecosystems are acknowledged as the ultimate goal, with miners taking a range of actions, including partnering with researchers, making greater use of data, and actively conserving and protecting ecosystems.⁷

Transparent decision-making: Measuring ESG performance would involve assessing public participation mechanisms, and accessibility to information. This would support addressing opportunities and challenges through early dialogue, knowledge exchange, and collaboration. ESG leadership would likely improve our access to financial investors and international markets. New Zealand's Strategy could help contribute to and shape global ESG standards to ensure the clean energy transition is socially and environmentally responsible in New Zealand and across the globe.

Polluter pays principle: Integrating the polluter pays principle into New Zealand's Strategy would assure New Zealanders that the costs for the remediation of any damage or detriment caused by the minerals sector will fall on the polluter. This will send a clear message to all those who pursue an activity, or intend to do so, to take the precautionary measures that are necessary to prevent damage or detriment to human health or the environment. It would also potentially add support to the social licence to operate.

Effective Te Tiriti o Waitangi partnerships and benefit sharing pillar

Partnerships: Recognising as a pillar the need for effective and genuine iwi and hapū participation in the minerals sector, would not only honour Te Tiriti settlement agreements, but would also value genuine partnerships to be essential to New Zealand's social and economic success and prosperity. Across the country, many Māori leaders and organisations have voiced their aspirations to hold decision-making roles on large projects. The benefits (joint ownership, directorships, employment, training, royalties etc) gained from the growth of the minerals sector, now and into the future, if equitably shared, would support Māori communities and their representative organisations to be

⁵ MfE, 2011. [cleaning-up-mapua-fcc-story.pdf \(environment.govt.nz\)](#)

⁶ [Risks and opportunities for mining and metals in 2024 | EY - Global](#)

⁷ [ey-top-10-business-risks-and-opportunities-for-mining-and-metals-in-2024-final.pdf](#)

active players in this sector. An estimated 54% of critical materials lie near indigenous people's land.⁸

Sustainable development goals and a circular economy pillar

Sustainable Development Goals: New Zealand has signed up to the United Nations Sustainable Development Goals (SDGs). From 2015 they have been a benchmark for all business activities and requirements for mineral activities. The United Nations Report 'Mapping Mining to the Sustainable Development Goals: An Atlas, United Nations Development Programme' (2016), states that the mining industry has the opportunity and potential to positively contribute to all 17 SDGs.⁹ The UN asserts, for the minerals sector to be sustainable, considerations of human rights, the environment, waste management, climate footprint and local communities must be sufficiently addressed.

The United Nations (UN) report shows that in recent decades, there have been positive developments globally, but that much work remains to be done. The mining industry as a whole and individual projects must meet requirements in several areas to contribute to the SDGs. The UN report (p. 4) highlights the following goals as particularly relevant for mineral activities:

- Clean water and sanitation SDG 6
- Affordable and clean energy, SDG 7
- Combatting climate change and its impacts, SDG 13
- Life on Land, SDG 15
- No poverty SDG 1
- Gender equality, SDG 5
- Reduced inequality, SDG 10
- Peace, justice, and strong institutions (including to reduce corruption) SDG 16
- Catalysing economic growth and decent employment SDG 8
- Industry, innovation and infrastructure SDG 9
- Responsible consumption and production SDG 12
- Partnership for the goals SDG 17

Climate change issues: The pillars of New Zealand's Strategy need to take a three-pronged approach to climate change. Firstly, by prioritising the mineral sector's actions to help New Zealanders transition to a low carbon industry. Secondly, by outlining how the mining sector itself needs to play a role in self-decarbonising. Thirdly, by outlining that the mineral sector itself needs to consider how it adapts to climate change impacts e.g water shortages and flooding. While the first approach is fairly obvious in the Draft Strategy, the Strategy ignores the importance of the latter two.

New designs and additional monitoring requirements (Global Tailings Review et al., 2020) highlight the need for new skills to handle such new environments.¹⁰ The Draft Strategy needs to signal that any new mines or expansion of sites in New Zealand should consider both the actual site of the mine and surrounding river channels and floodplains as increased flooding events are going to potentially mobilise contaminants that reside in soil sediment. Flood-related contamination in catchments affected by historical mining is a global emerging issue.¹¹ A stocktake on what legacy issues need resolving

⁸ [Energy transition minerals and their intersection with land-connected peoples](#)

⁹ [Mapping Mining SDGs An Atlas Executive Summary FINAL.pdf \(undp.org\)](#)

¹⁰ [The Impacts of Climate Change on the Mining Sector \(iisd.org\)](#)

¹¹ Macklin, Mark, (2024) University of Lincoln.

must inform new opportunities. Having appropriate skills and tools like sediment guidelines for local soils to understand these types of issues is essential.

New Zealand's responsible consumption of minerals: The Draft Strategy's pillars are silent on how New Zealand should control its own consumption of raw materials without adversely affecting other countries. Overall impact may be negative in terms of achieving the SDGs, but will vary depending on the raw materials, the specific countries, or companies New Zealand partners with and the supply chains of individual projects. Currently there are significant variations in the mineral sector between individual countries and projects.

The Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development asserts that the best approach to limiting the impacts of climate change is to change consumption patterns. Responsible consumption and energy-saving policies should be employed to limit the industry's overall footprint. This will encourage end-users, industries that use raw materials, and the mineral sector to use less energy and less water throughout the entire life cycle of minerals and metals.¹² The Tasman Climate Response and Resilience Strategy and Action Plan 2024-2035 acknowledges the Te Tauihu Intergenerational Strategy which includes climate change and regenerative outcomes. Partners to the Intergenerational Strategy aim to be good ancestors, reflecting the fact that the primary impacts of climate change will be faced by our descendants.

New Zealand's Strategy could signal under a SDG and circular economy pillar the commitment to having better information on how, for example, extraction projects will impact the SDGs. If this pillar, is all about making better use of what we have, our Strategy would steer the minerals sector towards a more holistic approach to prosperity and a clean energy transition, that has an intergeneration approach.

Circular economy: Through advanced material recovery, materials and especially metals from discarded products, buildings, vehicles, and other waste can become secondary raw materials for new products. Advanced material recovery is more environmentally friendly than mining and will be an important addition to the raw material supply from mining. Discarded electronics, batteries, and electric motors, for example, contain valuable and critical metals that can be reused. UK places a primary focus on investigating critical mineral dependencies and vulnerabilities across UK industry sectors.¹³

Norway approaches a circular economy by honing attention on waste disposal and management priorities, specifically by recognising expertise is needed on disposal methods for mining waste, by requiring new mineral projects to present a circular business plan and plan for the annual reduction of extractive waste, and by mapping and characterising tailing dams and landfills for future exploitation.

The EU's Green Deal and the Circular Economy Action Plan¹⁴ are increasingly setting important premises for the development of business and industry in Europe in a more circular and sustainable direction. UK, and Norway, also highlight the importance of the mineral sector accelerating a circular economy alongside making commitments to sustainability. Three of Norway's Mineral Strategy six pillars are:

- The Norwegian mineral industry must contribute to the circular economy.

¹² Supra n.20

¹³ [2022 UK Critical Minerals Strategy](#)

¹⁴ eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52023PC0160

- The Norwegian mineral industry must become more sustainable.
- Norway will be a stable supplier of raw materials for green value chain.¹⁵

Financing and reporting climate change and sustainability risk: There is an extensive focus on sustainability in the global mineral industry. Mining projects and companies that do not sufficiently safeguard environment, safety and human rights will, in the vast majority of countries, have greater difficulties in obtaining funding and general acceptance than sustainable projects. The consultancy firm EY ranked the ten most important risk factors for the minerals and metals sector in 2023, with environmental, social, and commercial conditions showing the highest risks.¹⁶ In countries where the local population and landowners have had a say in decisions on the establishment of extraction operations, impacts on local communities, water stewardship, tailings and waste management and climate have been the most predominant issues raised.

If New Zealand's Strategy aims to encourage financial institutions and investors to channel capital into companies operating throughout the country, they should be well equipped to manage climate and sustainability risks. Companies' disclosure of relevant and comparable information is crucial. To be able to assess and compare companies, financial market participants and other stakeholders need both information about how the company is affected by and deals with climate and sustainability-related circumstances and how the company's operations affect society and the environment around them. It is common for investors, banks, and financial institutions to impose sustainability requirements over and above the minimum requirements imposed by each country's national legislation. Such requirements are routinely adopted as part of a strategy to reduce the long-term risk of unforeseen consequences from mining operations and to safeguard the reputation of financial institutions and investors.

In the EU, a new Corporate Sustainability Reporting Directive (CSRD)¹⁷ has been adopted to facilitate the transition to a sustainable economy. The goal is to ensure that sufficient public information is available about the sustainability risks companies are exposed to, and the company's impact on people and the environment. Norway is considering embedding the CSRD into legislation.

The trade union that organises most of the biggest operators in Norway, has adopted the Canadian system Towards Sustainable Mining (TSM). The system aims to encourage its members to work systematically on developing the sustainability of the individual extraction sites. This is done by the individual sites reporting on their own development in a number of areas that include health, safety and the environment, biodiversity, climate, relations with local communities and indigenous people, and the disposal of tailings. The companies' self-reporting is reviewed by an external auditor, and the system has a reference group that comprises representatives of different stakeholder groups affected by the mineral activity. The reference group provides advice on how TSM should be implemented, followed up and developed. The Ministry of Trade, Industry and Fisheries has granted funding to the implementation of TSM.

To be defined as sustainable, draft criteria for the mineral sector would need to be established. The EU is considering criteria which may become the global standards for mining and metal production required to qualify for green financing. It is common for banks, stock exchanges, funds, and other sources of monies to have dedicated

¹⁵ [Norwegian Mineral Strategy \(regjeringen.no\)](https://www.regjeringen.no/en/dokumenter/norwegian-mineral-strategy-2023)

¹⁶ [ey-top-10-business-risks-and-opportunities-for-mining-and-metals-in-2024-final.pdf](#)

¹⁷ [Policy paper of the Federal Ministry of Economics and Climate Action: Ways to a sustainable and resilient supply of raw materials – Policies - IEA](#)

requirements for mineral activities. This may be materialised in the form of separate criteria that must be met or through the fulfilment of certain international standards. For mineral extraction, specific certification systems or standards such as Towards Sustainable Mining (TSM), the International Council on Mining and Metals (ICMM), the Responsible Minerals Initiative (RMI), the Responsible Mining Index (RMI) and the Initiative for Responsible Mining Assurance (IRMA) are often used. The systems can either be based on self-reporting or third-party assessments and can be based on voluntary affiliation at country, project/ site, company, group, or industry level.

Developing strategically important projects pillar

Priority technologies: Many countries have developed their own critical minerals list. While all these listed minerals may represent potential economic opportunities, commonly only some of them are inputs into priority technologies that support national interest. Australia has created a Critical Technology Statement¹⁸ and a list of critical technologies in the national interest¹⁹, which includes advanced manufacturing and materials, and clean energy generation and storage. This prioritisation ensures strategic alignment with the Australian Government's security, energy, industrial and employment priorities, as well as securing benefits for communities and consumers.

As part of their strategic approach, the Australian Government analyses the value chain for each priority technology to identify where Australia is best positioned to capture market share. This analysis will also identify the critical mineral products and types of projects needed for these technologies. The Australian Government prioritises support for strategic mineral projects that underpin priority technologies and clearly contribute to the vision and objectives of their Critical Minerals Strategy. Australia identifies priority technologies by their:

- overall contribution to emissions reduction, or security, energy, and industrial priorities.
- technology readiness.
- contribution to Australia's long-term comparative advantage and national interest.
- capacity to underpin strategic partnerships.

The EU has developed criteria for the selection of strategic projects to strengthen the EU's critical minerals value chain, as well as encourage new production and reduce administrative burdens. In the EU these identified strategic projects may benefit from facilitated access to finance and expedited permitting processes: 24 months for extraction permits and 12 months for processing and recycling permits.

New Zealand could also consider a list of critical technologies and strategic projects in our national interest.

Partnering with producing countries: Japan focuses its strategic approach to not only minerals but also producing countries. Japan's *Resource Green Transformation (GX) Diplomacy Guideline*²⁰ outlines the country's priority targets for Lithium Batteries and permanent magnets as well as priority countries to partner with e.g. Australia and Canada because of their stable investment environment. Japan is also considering the

¹⁸ [Critical Technology Statement](#)

¹⁹ [List of Critical Technologies in the National Interest](#)

²⁰ [Japan's Resource Diplomacy Guideline – Policies - IEA](#)

strategic opportunity of establishing a recycling network utilising e-scrap collection and domestic smelting facilities in developing countries in Southeast Asia and other regions.

Being able to identify nationally significant projects as proposed under the Fast Track Consenting Bill will require alignment of the Bill if enacted to the pillars of New Zealand's Strategy. Developing an integrated approach in the Draft Strategy like the EU, Australia or Japan is likely to benefit an emerging New Zealand mineral sector.

Tasman asserts that crucial to identifying nationally significant priority technologies and strategic international partners is the role of regional land planning, to identify issues pertaining to land and soil use and types, freshwater management, and hazards such as geological risks. Regional land-planning could help New Zealand to identify strategic mineral resources and projects.

Growing a skilled workforce: If New Zealand is to compete in an increasingly challenging and competitive labour market, we need to pay heed to what is happening in Australia, EU, USA, and other more advanced and mature international mineral industries.

In 2022, OECD reported that labour markets globally have tightened across countries and sectors.²¹ Europe reported 1.2 million open job roles across all sectors. According to one estimate, the US *Inflation Reduction Act* will create demand for 5.9 million new jobs in US clean energy and manufacturing over the next decade (Pollin et al, 2022). The American Jobs Plan, announced in March 2021, aims to invest USD 2 trillion in infrastructure, transportation, innovation, and in-home care over a period until 2030. This national plan has a significant focus on clean energy and climate technology.²²

In Australia, there are nearly 440,000 vacant positions, including more than 10,000 in the mining sector and more than 25,000 in the manufacturing sector (ABS 2023).²³ According to Jobs and Skills Australia, Australia has a national shortage of key professions such as:

- mining engineers
- geological, geotechnical, and processing engineers
- geologists
- hydrogeologists
- metallurgists.

These skills shortages in tandem with the reluctance of young people and recent graduates to join the mining sector present a real risk for the minerals sector. Only 15 per cent of respondents to a global survey said they would be interested in working in mining and only 54 per cent believed that the mining sector is an essential part of the global climate solution (BDO, 2022).²⁴

To address the needs of workforce in the sector, New Zealand's Strategy needs to consider all stages of the industrial value chains, especially those which are key to ensure a fair green transition and to ensure security and supply of critical raw materials.

²¹ [1bb305a6-en.pdf \(oecd.org\)](#)

²² [Biden-Harris Administration Announces \\$192 Million to Advance Battery Recycling Technology | Department of Energy](#)

²³ [6. Growing a skilled workforce | Critical Minerals Strategy 2023–2030 | Department of Industry Science and Resources](#)

²⁴ Supra n.35

EU countries, in line with objectives of the RE-Power EU plan and European Green Deal, aim to ensure a fair transition towards climate-neutrality by providing comprehensive policy guidance to ensure policies are formulated to ensure appropriate working conditions and wages, as well as to support quality job creation across industrial ecosystems and value chains, through up- and re-skilling of the workforce.

Recommendation Two

Include the below listed matters in New Zealand's Strategy's as strategic pillars.

- 2.1 Environmental protection and responsible mineral use including comprehensive management approach to climate change.**
- 2.2 Environmental Social Governance (ESG) leadership.**
- 2.3 Effective Te Tiriti o Waitangi partnerships and benefit sharing.**
- 2.4 Circular economy and sustainable development goals (SDGs).**
- 2.5 Prioritising the development of strategic projects and growing a skilled workforce.**
- 2.6 Human rights - including recognising gender and differentiated impacts on women.**

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?

More ambitious priority actions to support a framework balancing economic growth with environmental and social responsibilities:

Overall, the Strategy's priority actions should be more ambitious and support a framework balancing economic growth with environmental and social responsibilities. There are not enough clearly defined and dedicated actions to address environmental values and SDG commitments. Although some of the actions show clear synergies with international trends and key priority actions, there should be a more thorough analysis on the co-dependences between identified actions e.g. Actions 4c and 4d do not properly consider skill shortages nationally and across the globe. Equally important is an assessment of what skills will be required, what we currently have and where the shortfalls are, including gaps in training facilities and expertise. This should be done in the first year.

1. Improve data on New Zealand's mineral resources

Within the first year

a. We will engage Geological and Nuclear Sciences Limited to complete a detailed stocktake of New Zealand's known mineral potential including minerals currently in circulation (EVs, magnets etc) and buried in tailing storage facilities and landfills.

Within the first three years

b. We will improve the collection of Crown and private mineral data to better understand our mineral production statistics.

c. We will investigate growth pathway modelling to inform the potential of the sector into the future.

This action needs to consider the priority of accelerating a circular economy and how to approach risks identified and emerging by EY in 2023.

~~d. We will find out more about deep seabed minerals and assess the challenges and opportunities of extracting them.~~

Time and effort are better spent assessing challenges and opportunities related to a circular economy especially as it appears there is no social licence for deep sea mining in New Zealand.

2. Ensure secure, affordable, and responsible access to the minerals we need

Within the first year

a. We will develop a list of critical minerals that are key to our economic needs and strategic interests.

It is important New Zealand defines what we understand as "secure, affordable, responsible access" e.g ESG performance, SDG commitments. We need to know clearly where we sit on the world stage and what projects as well as minerals are in our strategic interest. See Australia's approach.

b. We will identify when and where supply risk for critical minerals exists, so that we can take action to reduce vulnerability.

Within the first three years

- c. We will explore how minerals listed as critical could be provided with preferential pathways for development.
- d. Support the development of coherent ESG standards for the import and export of raw materials and their processed products.
- e. Join efforts with international partners for consistent ESG standards (e.g., IGF, OECD)
- f. Expand advice and support to Small Medium Enterprises on sustainable and resilient raw material supply.

3. Develop a more enduring, efficient, and responsible regulatory framework

Quality versus fast track: The focus should be on quality applications not the speed at which they are processed to ensure we have a fit for purpose regulatory framework. This means including ESG performance measures and SDG Reporting. Many of the below actions rely on the Fast Track Consenting Bill and other RMA amendment Bills being passed and enacted. Tasman has raised many issues with these Bills, which if not addressed will undermine many of the Draft Strategy's actions.

Manaaki Whenua has designed a framework to assist with planning of future mine developments on the West Coast and in Southland as part of a collaborative research programme. This framework draws together research on rock geochemistry, aquatic chemistry, freshwater ecology, aquatic toxicity, and management and remediation techniques for mining. It was developed in conjunction with stakeholders/end-users including Department of Conservation, West Coast Regional Council, Environment Southland, Solid Energy NZ Ltd, Oceania Gold, Francis Mining and consultants. This framework is intended to enable informed decision making for proposed mining operations, specifically around minimising impacts on streams.²⁵ Resourcing these types of guides would be beneficial as a key action.

Within the first year - As per the comment above, focus should be on the quality of development applications and the integrity of the developer or mining company, not the speed at which they can be processed.

- a. We will develop a one-stop shop fast-track approvals regime to accelerate the development of regional and national projects of significance, including mining projects.
- b. We will progress amendments to the Resource Management Act 1991 and its national direction to improve consenting processes and ensure it provides an enabling and enduring framework for responsible development.
- c. We will progress regulatory changes that grow our minerals sector in a way that protects Treaty settlements through constructive engagement with local communities, Māori, and industry stakeholders in decision-making processes.
- d. We will maintain current permitting and access arrangement settings in relation to public conservation land.
- e. We will improve the efficiency of New Zealand Petroleum and Minerals permitting functions to enhance the speed of Crown Minerals Act permitting processes and to remove the minerals permitting queue.
- f. We will set targets for processing Crown Minerals permits and report on these publicly every quarter.

Within the first three years

²⁵ [Minimising environmental impacts of mining » Manaaki Whenua \(landcareresearch.co.nz\)](https://landcareresearch.co.nz)

- g. We will investigate the efficiency of the Crown Minerals Act system as it relates to the allocation and management of emerging minerals such as natural hydrogen.
- h. Require the amount of extractive waste to be kept at a minimum in all processes where feasible, based on the best available technologies and best available business models and operating and disposal methods.
- i. Require new mineral projects to present a circular business plan to reduce the amount of disposed material and contribute to better resource utilisation and less impact on natural environment.
- j. Require the project proponent to prepare plans for the annual reduction of extractive waste, use of chemicals and other environmental impacts.
- k. Avoid disposal of tailings if it is technically and economically feasible to use them as side streams in their own or another stakeholder's industry. If no such alternative use of tailings is believed to exist, it is necessary to report why, and what has been done to investigate the potential before permission for disposal can be granted.
- l. Ensure that, before new projects are approved, the project proponent documents the need to extract virgin resources rather than reuse previously extracted resources and how the resources extracted can be included in circular value chains and business models.

4. Foster sector innovation, value add and commercialisation, and workforce development

Within the first year

- a. We will identify suitable funding mechanisms to assist science, innovation, and technology to boost economic opportunities and returns from the minerals sector.

Within the first three years

- b. We will collaborate with the sector to identify and connect key research, and innovation opportunities to inform future investment, and explore the potential of establishing a minerals leadership research hub or group.
- c. We will encourage the sector to increase local workforce input in mining projects through employment, training, and contracts for services.

Need a stocktake of what skills and experience needed in first year and recognise there is a worldwide shortage of skills.

- d. We will encourage skills and training programmes that aim to grow and retain a skilled workforce. Need a stocktake of what skills and experience needed in first year.

e. We will encourage require industry to process, refine, and uptake other downstream capabilities to add value to our extracted minerals.

Could do this in the first year to support circular economy opportunities.

- f. Appoint an expert committee tasked with assessing the advantages and disadvantages of different types of mine waste disposal considering the development of new technologies, new methods and new international nature and environmental initiatives.

The expert committee to propose new environmental requirements for different types of disposal and consider the future use of submarine extractive waste disposal. Ensure that more consideration is given to hybrid disposal methods for finer and coarser materials.

The expert committee to submit its recommendation in the form of a report.

- g. Regional skills platforms are to draw up plans for how to meet the long-term skills supply needs.

Within 10 years

- f. We will support innovations that progress the development of products used in or in connection with mining, such as exploration and drilling technology, safety solutions and transport, including prospects for technology exports.

This should be supported in first three years.

5. Accelerate a circular economy of critical minerals in New Zealand

Higher priority needed for this. Should be a pillar.

Within the first year

- a. Harmonise circular economy and mineral strategies and leverage synergies in the development of a New Zealand Circular Economy Strategy
- b. Conduct individual material flow analysis and identification of measures to reduce barriers to recycling
- c. Establish economic incentives, regulatory minimum requirements, and financing instruments to stimulate innovation in resource efficiency and recycling

Within the first three years

- a. We will promote the investigation, innovation and establishment of minerals recovery, re-use and recycling technologies.
- b. We will identify funding mechanisms for research and innovation to occur within a circular resource development, use, and re-use framework.

6. Increase public knowledge and confidence in the sector

Within the first year

- a. We will provide the public with accurate data on New Zealand's demand and supply of minerals.
- b. We explore how to increase the visibility of decision-making on mineral activities. Increase public engagement mechanisms and decrease ministerial discretion.
- c. We will encourage require the sector to increase the amount of, and share with the public, contributions it makes to communities and the environment. e.g ESG performance, SDG commitments.
- d. Facilitate early dialogue in mineral projects.
- e. Consult Te Tiriti partners on proposals with the aim of reaching agreement.
- f. Consider Te Tiriti and regional royalties' schemes for mineral extraction in Settlement and regional areas.
- g. Consider Maanaki Whenua research and work and whether a dedicated guide on mineral activities in specific areas should be prepared. [Minimising environmental impacts of mining » Manaaki Whenua \(landcareresearch.co.nz\)](#) Mana Whenua, local authorities and community groups and the industry should be included in this work. It must also be considered whether the best solution to achieve this is through dialogue or the preparation of a joint guide.
- h. Consider the need for up-to-date knowledge about the impact of mineral activities on taonga species.

Within the first three years

- d. We will monitor and report on the social, environmental and community effects of mining on our regional communities. This should be regular, ongoing and before three years.
- e. We will encourage require the sector to work with relevant authorities to improve social outcomes related to new mining projects in regional New Zealand, including issues such as housing demand, health, and education services.
- f. Consider whether certification schemes or national or international standards for extractive waste can help develop public confidence and develop marketplaces and new business areas with public benefits.
- g. Consider a zero-chemical vision for use of chemicals that are not environmentally certified.
- h. Commission research institutes to obtain knowledge, identify research needs and identify challenges and opportunities relating to resource utilisation and use/disposal of waste from mineral extraction, including impacts on nature, wildlife, and ecosystem

health, as well as completion of mineral activities and restoration of extraction areas for other purposes, including for agricultural purposes. This with a view to identifying barriers and opportunities for developing the mineral industry in a more sustainable and circular direction. The work must take place in dialogue with the mineral industry and relevant expert communities.

i. Consider for all new major projects to use zero-emission machinery and vehicles by 2030 and for the entire industry to include zero-emission solutions for new investments when technology so permits.

j. Ensure that new mineral projects entail as efficient land use and as little encroachment as possible, generate the least possible impact on nature and impose requirements on project promoters to restore the area as soon as possible.

k. Ensure that potential subsequent use is planned from the start of mineral projects, so that previous mineral extraction sites can be used for other purposes, thereby reducing pressure on nature in other areas.

l. Require project proponents to document that the solution that entails the least encroachment has been chosen within the scope of a feasible sustainable business model and that the project contains clear goals and measures for natural capital accounting and restoration.

7. Attract investment and build international partnerships

Assessing New Zealand's strategic projects: New Zealand needs to assess like Japan, the priority countries, and companies we will both partner with and who we allow access to our own mineral sources before opening the doors for all thee come hither! Strategic projects receiving support should be implemented sustainably. Sustainable implementation means that the projects must be not only environmentally sustainable but also that they will respect the human rights set out in international instruments, guidelines, and principles.

Within the first year

a. We will promote investment opportunities in New Zealand to increase the scale and pace of development. This promotion must be aligned with an ethical approach that embraces e.g ESG performance and SDG measures.

Within the first three years

b. We will engage with countries to identify opportunities for collaboration and joint initiatives for the international trade of minerals. Need to ensure these countries have a social licence to operate.

c. We will support New Zealand companies to participate overseas in diversified, responsible, and transparent supply chains. Need to ensure these companies have a social licence to operate and adopt best practice and international standards.

d. We will work with and support international partners to diversify global mineral supply to build secure, resilient, and sustainable supply chains. Need to ensure these partners have a social licence to operate.

Recommendation Three

3.1 Include the suggested listed additional actions in red type above.

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?

Recommendation Four:

Consider the following opportunities:

4.1 Sustainable Development: Leveraging New Zealand’s mineral resources to foster sustainable economic growth while preserving environmental and cultural values.

4.2 Innovation and Technology: Promoting innovation in mining practices, such as through knowledge exchange programs and development of new technologies for environmental stewardship and efficiency.

4.3 Regional Development: Supporting regional development through regional royalties.

4.4 Knowledge Exchange and Collaboration: Establishing forums for dialogue, knowledge exchange, and collaboration among Te Tiriti partners and stakeholders to improve industry practices and address challenges effectively.

4.5 Strategic Market Capture: Identifying minerals crucial to priority technologies and which align with New Zealand’s national interests.

4.6 Economic Diversification: Developing critical minerals projects to support economic diversification, particularly in regional and Māori communities.

4.7 ESG Leadership: Reinforcing high Environmental, Social, and Governance (ESG) standards to enhance market access and to support sustainable development, crucial for maintaining New Zealand’s social license to operate.

4.8 A Vision to prevent the use of chemicals that are not environmentally certified.

4.9 Alignment of Strategy to a strong regulatory framework informed by the polluter pays principle and bond surety.

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?

- Minerals are critical to our economic functions, and we need to understand our needs and ensure reliable access to them – lack of complete understanding of our minerals ecosystem and strategic risks such as supply disruptions domestically and internationally. A lack of quality data hinders good decision-making. We are in a vulnerable position when it comes to supply. We need to understand demand and shore up supply of the minerals that keep our economy moving, such as sand and aggregates. **Ensuring effective consultation and dialogue with Te Tiriti partners, stakeholders, local communities, and other affected parties, to address concerns and gain support for a responsible mineral sector.**
- We need to get the regulatory framework right – There are **safeguards and** barriers within our regulatory system. **Poor applications with incomplete information are increasing long term environmental and investment risk.** The length of time it takes to deliver mining projects is costing us. We need to get the enabling policy and regulatory settings for the resources sector right, **to protect environmental, cultural, and social values and priorities** whilst unlocking and balancing economic opportunities for the benefit of New Zealanders. **The cost of getting it wrong could fall on the environment, future generations and the public purse.**
- Mineral activities need to happen in a responsible and environmentally sustainable manner – Our mineral production needs to be done in a responsible way. This involves ensuring we balance environmental protection and long-term environmental sustainability with the need for resource development. We need to take measures to **avoid and** minimise environmental impacts, ensure best practice rehabilitation plans, and mitigate environmental risks associated with mining. This also includes ensuring ongoing protection of areas of high value (recognised as Schedule 4 conservation land in the Crown Minerals Act 1991), while also considering proposals to responsibly explore mining potential in other conservation areas. There have been times when the sector hasn't got it right. If environmental risks associated to increased mineral activities are not properly managed, they could mean fiscal risks to the Crown and New Zealanders. New Zealand has reputation for high environmental standards. We want to leverage this reputation and establish a regulatory system that is consistent with global standards but also position ourselves as a worthy example of where responsible mining happens. **To resolve the insufficiency in mining-environmental land-use planning by creating exclusion zones and management plans in protected areas.**
- Technological innovation and responsible recycling of materials need to be part of a responsible minerals regime – Embracing technology and innovation can enhance productivity and reduce financial, social, environmental, and governance costs associated with minerals development. We also need to be proactive in how we recover minerals for their re-use and recycling. This could help us avoid or significantly minimise the environmental impacts associated with scrapped or decommissioned components made from minerals and could ease the scarcity of critical minerals. For example, projections by the International Energy Agency suggest that recycled amounts of lithium, nickel, copper, and cobalt could reduce the global primary supply requirements of these minerals by 10 per cent by 2040. **To improve the traceability and fair marketing of gold and other critical minerals we need to implement due diligence and establish chain of custody protocols.**
- We need to attract the right investment for our economic growth and access international markets – There are significant economic opportunities which our minerals sector offers. But capital investment is also required to tap into the economic opportunities. We need to explore measures to attract and retain

international investment in the minerals sector. As we think about our national minerals sector, we also need to create channels to access international markets through **ESG performance measures, reporting achievement of SDGs**, leveraging existing trade agreements and export promotion initiatives. **Building reliable, competitive, and diverse supply chains and strategic partnerships to attract investment cannot be viewed in isolation from our climate commitments, the global net zero transition and the role New Zealand can play in helping international partners achieve their emissions reduction targets.**

- Avoiding unintended consequences – While we know that some of our regions have grown on the back of the minerals sector, we also want to avoid any unintended social and environmental consequences that could occur due to increased minerals activities. There will be a need to work with other agencies to design measures to plan for any increased demands across our regions.
- ~~We will find out more about deep-seabed minerals and assess the challenges and opportunities of extracting them.~~ **Put the energy into finding out more about a circular economy for New Zealand.**
- **Coordinating activities such as mining with other land uses like farming poses challenges, requiring careful consideration and dialogue to prevent conflicts. To address the lack of effective social participation in mining development activity we need to strengthen the participation mechanisms in the granting of mining titles and environmental permits. We also need to address climate change and promote resilience and adaptation.**

Recommendation Five

5.1 Consider the challenges and their suggested rewording identified in red type above.

5.2 Remove reference to deep seabed mineral extraction.

- 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.

There are other things that have been missed that require consideration for the Draft Strategy.

Recommendation Six:

Include the following matters in actions or opportunities:

6.1 Mapping the geographic distribution of environmental, social and governance risks in New Zealand.

6.2 Mapping and analysing the footprint of energy transition minerals and metals (ETMs) including both current and future possible mines using indicators for land ownership and use, human modification of land, food production, water risk, conflict, as well as national capacity measures for protecting Te Tiriti rights.

- 6.3 Developing a battery circular economy too, something similar to e.g. [Battery Circular Economy Initiative Dashboard - RMI](#)
- 6.4 Outlining how the mining sector itself needs to play a role in self-decarbonising.
- 6.5 Outlining how the mineral sector itself needs to consider climate change adaptation priorities.

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:

Consider the invaluable role the local government sector can play to develop a Minerals Strategy that supports regional and local economies. This includes consulting with Local Community Boards where mineral extraction, recycling and infrastructure projects will have an impact.