



TE ĀTIAWA
O TE WAKA-A-MĀUI

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31 July 2024

To: The Ministry of Business, Innovation and Employment
Parliament Buildings
Wellington

Tēnā koe,

RE: Response to New Zealand's Future Minerals Strategy 2040

This letter details our concerns regarding the 'Draft Minerals Strategy for New Zealand to 2040'. Our opposition stems from several issues that we believe warrant urgent attention and reconsideration.

Lack of engagement: We observe that the Crown's lack of engagement and consultation with Iwi in developing this Strategy undermines the Treaty principles of partnership and active protection. Meaningful consultation must be characterised by proactive engagement with Iwi, supporting decision-makers in working from a place of mutual understanding to grasp the actual and potential effects.

Fast Track and RMA Amendments: We firmly oppose fast track changes and the proposed RMA amendments that seek to make mining activities more permissive. The prioritisation of expedited development over crucial environmental safeguards and community engagement is concerning. The focus on the one-stop-shop for fast-tracking mining projects, combined with regulatory changes aimed at simplifying consenting processes, threatens environmental safeguards and overlooks long-term effects on ecosystems and local communities. We believe that a responsible regulatory framework must ensure adequate environmental scrutiny and genuine consultation with Iwi and other affected parties rather than merely streamlining approvals.

The limited scope for Iwi involvement, constrained to Deeds of Settlement or reduced to mere consultation without veto power, disregards the principles of partnership and self-determination enshrined in Te Tiriti o Waitangi. Meaningful participation in decisions about mining permits in our rohe is not only a matter of respecting our tino rangatiratanga but also crucial for protecting our whenua, wai, and wāhi tapu. The messaging in the draft strategy undermines these values and the need for Iwi to have

a substantive say in matters that profoundly impact our whenua and taonga. To uphold Te Tiriti o Waitangi and ensure that the strategy reflects genuine partnership, it is essential that iwi are granted decision-making authority and veto rights over mining activities within their rohe.

The Strategic Pillars: We believe that the use of the proposed strategic pillars misses the crucial need for responsible management of te taiao. We recommend inserting 'Environmental Stewardship' as the initial strategic pillar, focusing on protection and sustainability of the natural world. The Strategy narrowly describes minerals as 'economic assets' and overlooks the vital role of indigenous flora and fauna. Expanding the minerals sector as proposed is irresponsible and poses significant risks to te taiao, including habitat destruction and pollution, which threaten local ecosystems and biodiversity.

Local Impact: Tangible health risks that result from mining include degraded water quality and mahinga kai and exposure to dust, noise, and chemicals, including through the consumption of bioaccumulate in animal tissues¹. For these reasons, mining is a threat to our taonga tuku iho (valued flora and fauna) and associated customary practices which are core to our health and identity. Recently, we were informed of an application under the proposed Fast Track process that poses a serious threat to Te Waikoropupū Springs, a significant taonga and wāhi tapu. A mining company with a concerning history of environmental neglect plans to mine Sams Creek, which risks severe contamination of local water sources and irreversible damage to the crystal-clear waters of Te Waikoropupū Springs due to the creation of large quantities of arsenic-laden waste. This application must be denied, and the protections afforded by the Water Protection Order must be upheld to safeguard the pristine waters of Te Waikoropupū.

Economic Sustainability: We believe it is unwise to place heavy emphasis on mineral extraction, risking resource depletion and economic instability typical of boom-and-bust cycles in the mining industry. This strategy may divert investments from potentially more sustainable sectors like technology and renewable energy, impacting long-term economic resilience.

Climate Change: Continuing to promote coal mining as the 'backbone' of the mining industry in Aotearoa poses significant dangers to our collective efforts to combat climate change. Our future is at risk when coal mining remains a central focus,

¹ Chemical contamination from mining. NIWA. Accessed July 22, 2024.
<https://niwa.co.nz/freshwater/kaitiaki-tools/what-impacts-interest-you/chemical-contamination/causes-chemical-contamination/chemical-contamination-and-mining>

highlighting the urgent need for a shift towards cleaner, renewable energy sources to safeguard the planet and contribute to the clean, green reputation of Aotearoa.

Nāku noa, nā,

A handwritten signature in black ink, appearing to read 'Justin Carter', written in a cursive style.

Justin Carter

Pouwhakahaere | Chief Executive
Te Ātiawa o Te Waka a Māui Trust