

Submitter information

The Ministry of Business, Innovation and Employment (MBIE) would appreciate if you would provide some information about yourself. If you choose to provide information in the “About you” section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

A. About you

Name: Tim Gummer

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

Independent expert (please specify below)

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:

Concerned citizen

E. Privacy information

- The Privacy Act 2020 applies to submissions. Please check the box if you do not wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions, or a summary of submissions, received to MBIE's website at www.mbie.govt.nz. If you do not want your submission or a summary of your submission to be placed on our website, please check the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

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?

The strategic pillars of the draft strategy need significant strengthening to address social and environmental impacts comprehensively. The current focus on economic value can lead to dire consequences such as polluted waterways, habitat destruction, and public health concerns. It is imperative to introduce a stand-alone pillar dedicated to risk management that assesses stakeholder risks holistically. Only those minerals that contribute directly to a just energy transition should be mined; coal mining must be excluded.

Offshoring our mining responsibilities is ethically problematic. Aotearoa should strive for a balance between economic benefits and our social and environmental duties, adhering to the ethic of reciprocity.

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?

The proposed actions lack ambition and they fail to prioritise citizen welfare and the clean energy transition adequately. Fast-tracking approvals primarily empowers large corporations at the expense of public interest. This concentration of decision-making power heightens the risk of corruption and undermines democratic processes. More to the point, continuing coal and seabed mining activities is inconsistent with climate objectives and detrimental to marine ecosystems.

Stringent safety measures and robust environmental regulations are essential when mining high-value minerals necessary for decarbonisation. Ethically sourcing these minerals ensures we do not perpetuate global exploitation or unrest.

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?

Aotearoa has an opportunity to lead in conscious mining practices by developing frameworks that assess new minerals' contributions towards decarbonising our economy. Such initiatives would position us as pioneers in achieving a just transition while maintaining ethical standards.

Learning from successful tailings management practices globally can help us sustainably share the environmental burden, aligning with principles of balance and reciprocity.

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?

The draft overlooks critical challenges including environmental degradation, public health risks, legal complications, and land rights issues.

Addressing all these challenges is vital for creating a sustainable mineral sector that respects both people and nature.

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.

Relying heavily on mining - particularly fossil fuel - is clearly and brazenly unsustainable and unethical. We should explore alternative regional income sources through high-value economies that do not compromise our environment or communities' well-being.

While some minerals are indeed essential for transitioning to renewable energy systems, their extraction scope should remain limited.

Adopting practices rooted in balance, reciprocity, and symbiosis will foster more ethical relationships with natural resources—a necessity if we are committed to a genuinely sustainable future for New Zealand.

If supporting conflict-zone extraction is a consequence of our demand for high energy or exotic materials - then a national conversation about moderating demand should come before indulging in high-risk mining in our own back yard. Protecting conservation lands is crucial for preserving biodiversity and ecosystem services which provide long-term ecological stability.

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:

Shane Jone's proposed new Minerals 'Strategy' purports to support a clean transition, but its purpose is clear given the bulk of our available mineral stock is coal. And stripping the seabed would be a terrible own goal.

The callous disregard for environment and safety shown by key cabinet members already is good evidence why the Fast Track provisions particularly, should not be enabled. Far more scrutiny and real, independent ethical oversight is required in this space.