

Submission on the Draft Critical Minerals List.

The Critical Minerals list includes 34 elements/compounds (plus aggregate), and if you expand the Platinum Group (6) and the REEs (17) it comes to 55, which is over half of the naturally occurring elements in the periodic table. 'Criticality' is estimated with regard to a number of domestic and international factors, not just scarcity alone.

Given that so many minerals are deemed essential for modern industry and manufacturing, and given that only some of the minerals incorporated in manufactured products are affordably recoverable – once they're mined, they're gone - the implication is surely that simply "promoting mining" per se and "attracting permit applications" is in some cases irrational. If we have unexploited reserves of critical minerals that are currently available via overseas supply chains, is there not a case for keeping what we have in the ground until it is absolutely needed, rather than exhausting it now?

Also irrational is down-sizing GNS at a time when it's strategically important to know the location and extent of our 'critical mineral' reserves. And to fulfil its stated outcome, that "[v]alue is sustainably derived from the natural environment", MBIE should be promoting research into mineral recycling processes, and also identifying a list of critical minerals that are squandered in junk products, or substitutable.

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Privacy of natural persons

