

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: [KD McGraw](#)

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:

[River Pathways Consulting](#)

D. The best way to describe your role is:

Academic/researcher/research institute

Independent expert (please specify below)

Community group (please specify below)

Business owner (please specify below)

Consultant (please specify below)

Environmental NGO (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:

[Consultancy focused on working with Regional Councils in identifying river run gravel extraction opportunities and coordinating applications for resource consents and other approvals required to undertake extractive activities by commercial gravel operators.](#)

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 Draft Critical Minerals List for New Zealand

MBIE is developing a critical minerals list for New Zealand to identify the minerals that are:

- essential to New Zealand’s economy, national security, and technology needs, including renewable energy technologies and components to support our transition to a low emissions future; and/or
- in demand by New Zealand’s international partners to enable us to benefit from international economic opportunities, contribute to the diversification of global mineral supply chains and improve the pipeline of the end-use products for which these minerals are essential; and
- susceptible to supply disruptions domestically and internationally. In some instances, we rely on domestic sources of minerals, but the supply of these minerals can be constrained, for example by regulatory factors and social licence. Internationally, supply chain disruptions could arise due to geopolitical risks and external market forces.

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 are also essential to modern economies as they are needed to manufacture advanced technologies such as semi-conductors, defence applications and medical equipment. Minerals are also critical for a clean energy transition as low emission technologies requires more mineral inputs than those fuelled by fossil fuels.

The extraction and processing of the minerals essential to New Zealand and our international partners are concentrated in a few countries. Any disruption that interrupts operations at a large facility or group of facilities can have a major impact on supply availability, and therefore on prices. The greater the concentration of production the larger the affect a disruption can have.

In addition, New Zealand does not manufacture a wide range of technologies, we are generally an end consumer of many products produced internationally and rely on the functioning of international supply chains and their access to resilient supplies of minerals.

The development of a critical minerals list is one of the key actions identified in the draft Minerals Strategy that was publicly consulted on from 23 May – 31 July 2024. Due to the technical nature of the list, MBIE engaged a consultancy with specialist expertise, Wood Mackenzie, to support the development of the list.

We are seeking feedback on the content of the draft list that has been developed by Wood Mackenzie for New Zealand. It identifies the minerals that are critical to New Zealand and summarises the reason for their inclusion in the list. Once the list is finalised, actions could be identified to help us reduce the ‘criticality’ of those minerals, i.e., secure better access to them.

Please see the draft Critical Minerals List attached below for more information.

Questions for the consultation

1. Have we missed the inclusion of any mineral(s) on the draft Critical Minerals List?

Yes, (please provide more details below) No, the list is okay. Not sure/no preference
Is there anything you would like to tell us about the reason(s) for your choice?

2. Have we included any mineral(s) that you think should not be on the list?

Yes, (please provide more details below) No, the list is okay. Not sure/no preference
Is there anything you would like to tell us about the reason(s) for your choice?

3. Do you have any further feedback on the list, or the methodology under which it was developed?

Yes, (please provide more details below) No, the list is okay. Not sure/no preference
Is there anything you would like to tell us about the reason(s) for your choice?

Concerned to the low consideration on the supply risk assessment to the importance of sand and gravel to not only economic importance to NZ but future access to this raw material as the vital component required to meet continuance of virtually all industry types critical to NZ GDP. Principally sand and gravel are the gold standard required for all types of construction from basic residential to major structures including activities associated with decarbonizing NZ in line with both national and international climate change obligations. Sand and gravel being primary components for production of concrete used in construction of life lines and critical infrastructure across NZ especially when considering without this raw material the infrastructure required to extract the high value of minerals would not be able to occur without assured continued supply.

The main risk to future supply relates to the significant level of difficulty in gaining Resource Consents, Permits, Authority to access and extract identified sources whether it be land based pits or from river-based supply.

Albeit the underlying principals and aims of the Resource Management Act 1991 are to make sure that natural and physical resources are managed sustainability the role of Regional and local Councils apply a such very high layer of bureaucracy in terms of applying the requirement to apply assessment of applications for consent to extract sand and gravel against a significant number of National legislation and local government plans and rules make sustainable extraction of commercially sustainable volumes sand and gravel extremely difficult to achieve.

Understanding and in recognition of the real and significant need for sand and gravel as minerals vital to the continuance of New Zealand's economy, technology needs and construction of renewable energy technologies the risk to future supply of sand and gravel required to support those current and future industries I believe needs a higher-level score in terms of the Supply Risk Assessment Outcomes assessment process.

Thank you

Thanks for your feedback, we really appreciate your insight on the development of New Zealand's Critical Minerals List.