

# Consultation submission form

A Draft Minerals Strategy for New Zealand to 2040  
MAY 2024



# How to submit using this form

This form is used to provide feedback on the draft Minerals Strategy for New Zealand to 2040.

When completing this submission form, please provide comments and reasons explaining your choices. Your feedback provides valuable information and informs decisions about the design of the strategy.

You can submit this form by 5pm, Wednesday, 31 July 2024 by:

- Emailing to [resourcesfeedback@mbie.govt.nz](mailto:resourcesfeedback@mbie.govt.nz) with subject line '**Minerals Strategy Consultation 2024**' or
- Posting to:  
**Minerals Strategy Consultation 2024**  
Resource Markets Policy  
Ministry of Business, Innovation and Employment  
PO Box 1473  
Wellington 6140

Your feedback will contribute to further development of a Minerals Strategy for New Zealand. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

# 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: Dr Ivan M. Johnstone

Email address: scan@seniorsclimateactionnetwork.org

## 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:

Seniors Climate Action Network (SCAN)

## 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:

Ivan M. Johnstone BSc(Physics), BArch(Hons), PhD

Researcher and website developer for Seniors Climate Action Network (SCAN)

<https://seniorsclimateactionnetwork.org>

Our SCAN submission is a team effort by both Ivan Johnstone and Sue Novell.

**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](http://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 proposed strategic pillars are not suitable because they put economic growth first and foremost and do not take into account the costs to the health of the natural environment and all its communities, on which our economy depends.

Prosperity in the Draft minerals strategy for New Zealand means economic growth – “Our economy has access to the minerals it needs at the right time and in the right quantities to grow” and “Growth will be underpinned by scaling up our existing exports and by realizing new mineral opportunities” and “We need to attract the right investment for our economic growth” and “We will investigate growth pathway modelling to inform the potential of the sector into the future”.

**The primary purpose of mining should be to provide long term resilience and self-sufficiency for all New Zealanders, including future generation. Continued economic growth will only but lead to higher levels of consumption, the primary cause of exceeding planetary boundaries.**

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 key actions are not the right ones because they will not deliver what they set out to do. The proposed Fast Track Approvals Bill will enable Ministers to ignore expert advice on protecting the environment and the will and wishes of New Zealanders. This causes harm to the environment and society. The kinds of projects that should be eligible for fast tracking are the ones that benefit the health of an ecosystem, which in turn benefits the health of biodiversity, our communities and economies.**

**SCAN strongly agrees with items 2 to 5 included but strongly disagrees with Item 1 – “Implementing the Fast-track Approvals Bill” and Item 6 – “Promoting investment opportunities to increase the scale and pace of development” if the primary purpose of doing so is to increase economic growth.**

**NZ needs to shrink sectors of economic activity that are ecologically destructive and grow those that satisfy basic needs and wellbeing of all (agro-ecological food networks, renovation of buildings, low-impact transportation and recreational activities, etc.). We need to develop a strategic plan to tackle overconsumption and set a material footprint reduction target.**

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?

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?

**Ecological health, health of communities, legal and ownership challenges have not been considered.**

**Protection of the environment is inadequately addressed in the Draft minerals strategy for New Zealand. New Zealand might have a “reputation for high environmental standards” but in practice does not. An example is the pollution of our waterways which current legislation allows.**

**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.

**A Draft minerals strategy for New Zealand should include explicit statements that any mining of minerals in New Zealand is followed by mandatory full remediation of a mining site with funds withheld in escrow to do so should any mining company default on its legal obligations.**

**The Draft Minerals Strategy should require that the mining industry**

- **uses cleaner production methods - reduces environmental impacts**
- **accepts limits, uses the precautionary principle (where there are high risks and unknowns of environmental damage, do not proceed), gets community consent**
- **embraces recycling because consumption has to, and will, decrease**
- **admits fault and trade-offs, becomes fully transparent, discusses failures in public**
- **polices itself, builds and shares ethical standards, systematic monitoring**
- **accepts and respects external regulation, ensures compliance with relevant regulations**
- **pays its way - fair taxes on all production.**

# 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:

**The current Minerals Strategy already provides guidelines for extraction in NZ in an environmentally conscious way.**

**Due to physical planetary limits, depletion of resources, increasing effects of pollution, climate change and geopolitics, we recommend that the NZ Government plans for and facilitates ways of living that enable its citizens to thrive using less energy, minerals, and material supplies.**