



MINISTRY OF BUSINESS,
INNOVATION & EMPLOYMENT
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Summary of submissions

A Minerals and Petroleum Resource Strategy
for Aotearoa New Zealand: 2019–2029

November 2019



NZPM 5013

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Purpose of this document

1. This document summarises and provides a record of views from the submissions received on the draft “Responsibly Delivering Value – A *Minerals and Petroleum Resource Strategy for Aotearoa New Zealand: 2019-2029*’ (the Strategy). This document sets out:
 - 1.1. the number of submissions received and from which groups
 - 1.2. a summary of the key themes across the groups, and Government responses to those themes
 - 1.3. a high level summary of submissions by submitter group
 - 1.4. a high-level summary of responses to targeted questions
 - 1.5. other matters that were raised as part of consultation.
2. The questions provided on the online submissions form are attached in full at Annex one for reference.

Introduction to the Strategy

3. The minerals and petroleum sector contributes significantly to the wellbeing of New Zealand. It provides jobs, income, and the resources we need to power and build our economy. Given the sectors’ importance to the economy, the Government is working to provide the sector with stability and certainty. As part of this, the Government committed to the development of a Minerals and Petroleum Resource Strategy.
4. The Strategy is a 10-year strategy that articulates the Government’s long term vision and objectives for the minerals and petroleum sector in New Zealand. The Strategy supports the transition to a low emissions future and a productive, sustainable and inclusive economy.
5. The Strategy also articulates a set of principles to assist Government, iwi/ hapū, industry and any other groups making decisions that affect the sector. It aims to help guide the development of the sector and inform the direction of future government policy. The Strategy also contains action areas and specific actions on which the Government will focus in the coming years.
6. The Strategy sets the direction for the sector – there are no policy commitments.
7. It is intended that the Strategy will:
 - 7.1. provide a shared vision and principles that can help all groups think through minerals and petroleum resource issues
 - 7.2. communicate the vision the Government has for the sector thereby giving certainty to industry and the wider public

- 7.3. inform future Government policy affecting the sector.

What we did – consultation process

Early Engagement

8. Throughout the development of the Strategy, the Ministry of Business, Innovation and Employment (MBIE) engaged closely with a number of Treaty partners and other key stakeholders. Between March and June 2019, MBIE sought views from Treaty partners and key stakeholders on the following:
 - 8.1. thoughts on what they would like to see in a petroleum and minerals resource strategy
 - 8.2. perspectives on the future of petroleum and minerals in New Zealand
 - 8.3. perspective on the current regulatory regime for petroleum and minerals in New Zealand
 - 8.4. thoughts on any issues they have with the Crown Minerals Act 1991 (CMA) that they want explored in the CMA review
 - 8.5. thoughts on how New Zealand can sustainably derive value from its petroleum and mineral resources.
9. Feedback was received through written responses, face to face meetings, phone calls and workshops. This feedback informed an early draft version of the Strategy which was circulated to Treaty partners and key environmental groups, industry groups, research institutes, regional and local councils and academics in June 2019.
10. Submitters were supportive of the Government developing a resource strategy for minerals and petroleum in New Zealand. However, some submitters wanted the strategy to be positioned further along the environmental protection spectrum while others wanted the strategy to be positioned further along the economic spectrum. Submitters views helped inform the drafting of the consultation version of the Strategy.

Public Consultation Period - 27 August 2019 to 20 September 2019

11. MBIE consulted publicly on a draft Strategy entitled 'Responsibly Delivering Value - A Minerals and Petroleum Resource Strategy for Aotearoa New Zealand: 2019-2029' between 27 August 2019 to 20 September 2019. The draft Strategy articulated:
 - 11.1. why New Zealand needs a Strategy
 - 11.2. an overview of the minerals and petroleum sector in New Zealand
 - 11.3. the regulatory regime for the minerals and petroleum sector in New Zealand

- 11.4. the Government's vision for minerals and petroleum in New Zealand
 - 11.5. objectives that build towards the vision
 - 11.6. guiding principles
 - 11.7. six action areas where the Government can make a significant contribution towards the vision and objectives of the Strategy.
12. MBIE provided web forms for submitters to respond to targeted questions, which allowed submitters to focus in on key areas of the draft Strategy. There were 32 targeted questions regarding views on the draft Strategy (these questions are reproduced in full in Annex one), the remaining 16 were standard questions about the submitters and the use and release of information. The targeted questions sought views on:
- 12.1. the overall vision for the minerals and petroleum sector in New Zealand
 - 12.2. the objectives for the minerals and petroleum sector
 - 12.3. the guiding principles
 - 12.4. the action areas
 - 12.5. suggested future actions.
13. We also allowed emailed or written submissions to enable submitters to provide more in-depth responses.
14. Information about the consultation process was communicated through social media, information on our website, and emails to our Treaty partners and groups of key stakeholders (environmental groups, industry, local and regional councils and research institutes).

Submissions received

15. A total of 546 submissions on the draft Strategy were received. See figure 1 for breakdown of submissions by submitter group.

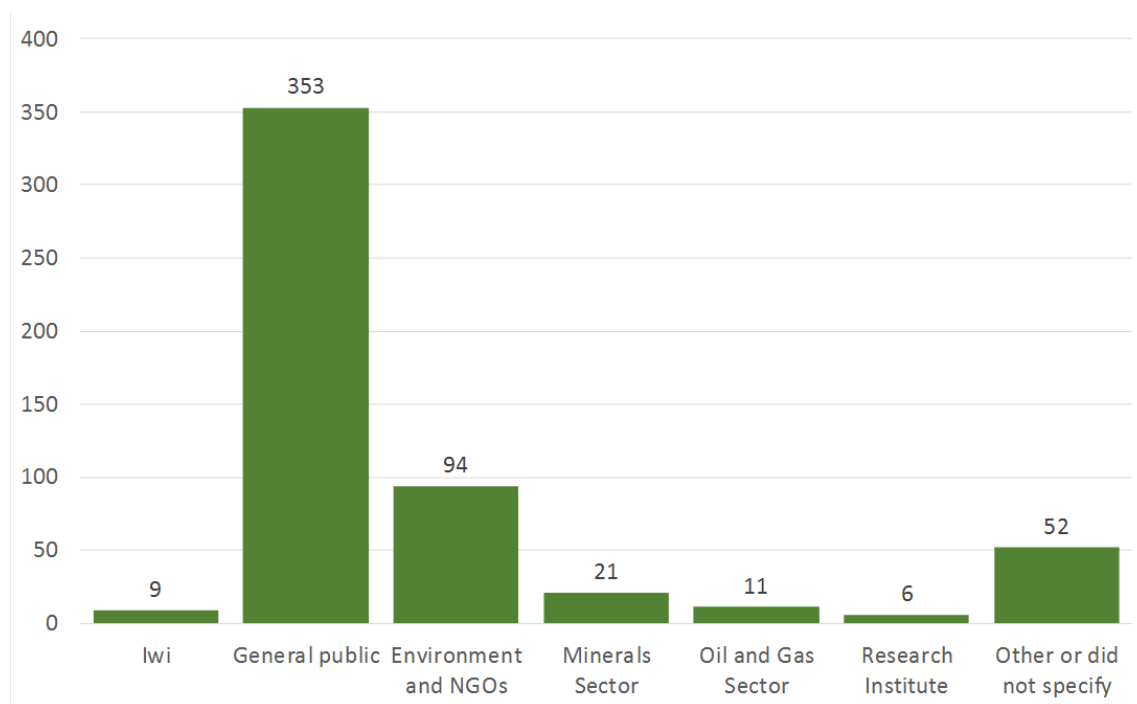


Figure 1: number of submissions by group

16. The Environment and NGOs category represents both non-governmental organisations (NGOs) and individuals who identified themselves with environmental groups.
17. The Minerals Sector category represents both submitters who identified with the minerals sector as well as submitters who identified with the quarrying sector.
18. Only 12 per cent of submissions were made on behalf of a group or organisation. The remainder came from individuals. 65 per cent of submissions received were from individuals from the general public.
19. The majority of submitters (511) provided their views through the online survey on MBIE's website.
20. Twenty one of the submitters, who used the online survey, also provided attachments with their submissions; a majority of the attachments provided a more detailed response than those who did not submit an attachment. Some attachments included images.
21. Thirty five submitters emailed their submission directly to MBIE, these submissions tended to be more detailed than the submissions provided through the online survey. A majority of these submissions were on behalf of a group or organisation.

Summary

22. Each submitter who completed the online submission form was asked whether they agreed or disagreed with each key component of the Strategy (vision, objectives, principles and action areas). Submitters could score an element either a 2 for strongly agree, 1 for agree, 0 for neither agree nor disagree, -1 for disagree and -2 for strongly disagree. Overall, the Strategy was positively received (see figures 2 and 3) with 24 out of the 26 components of the Strategy scoring positively, and only two components scoring negatively. The two components which scored negatively were the vision and the principle of the Crown honouring the rights of current permit holders to continue production or exploration activities under existing permits.

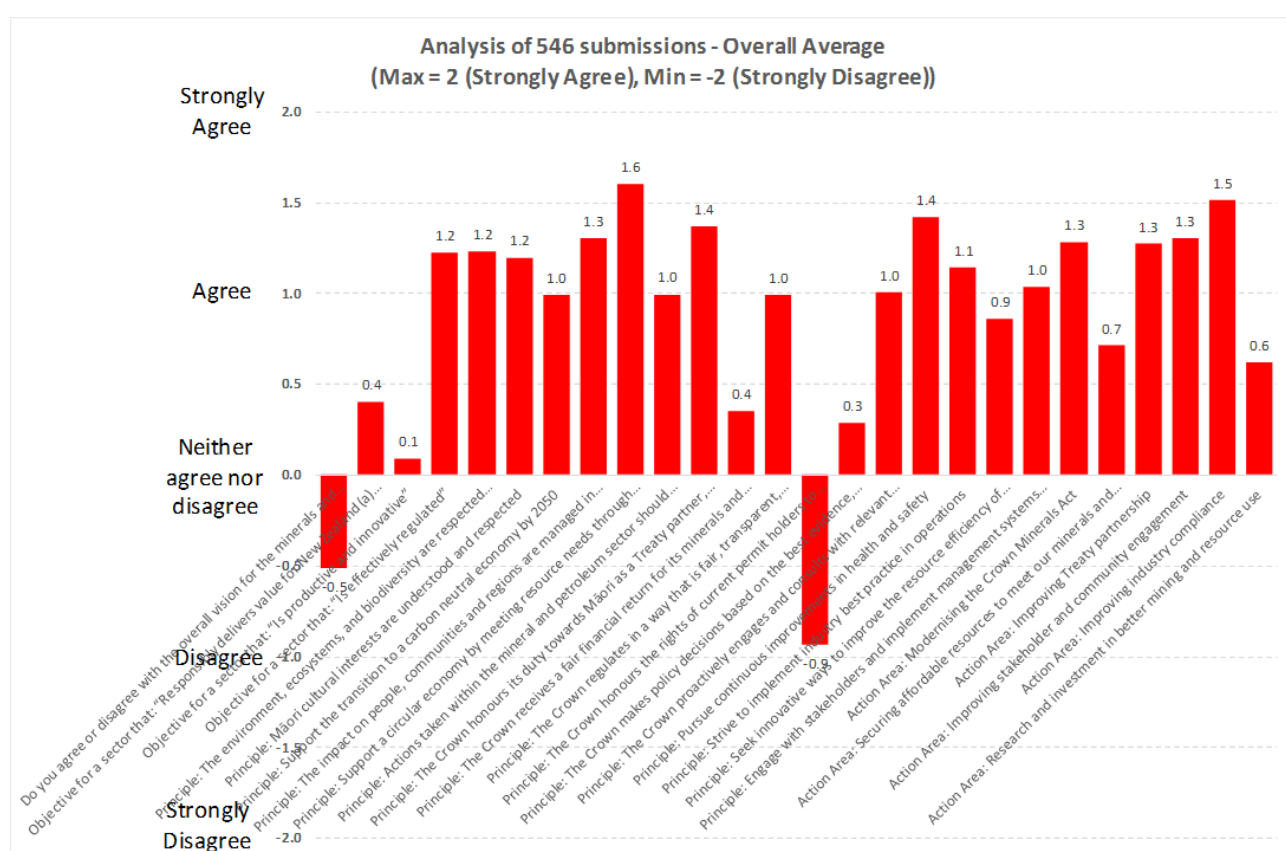


Figure 2: How submitters responded to each question posed by the online survey

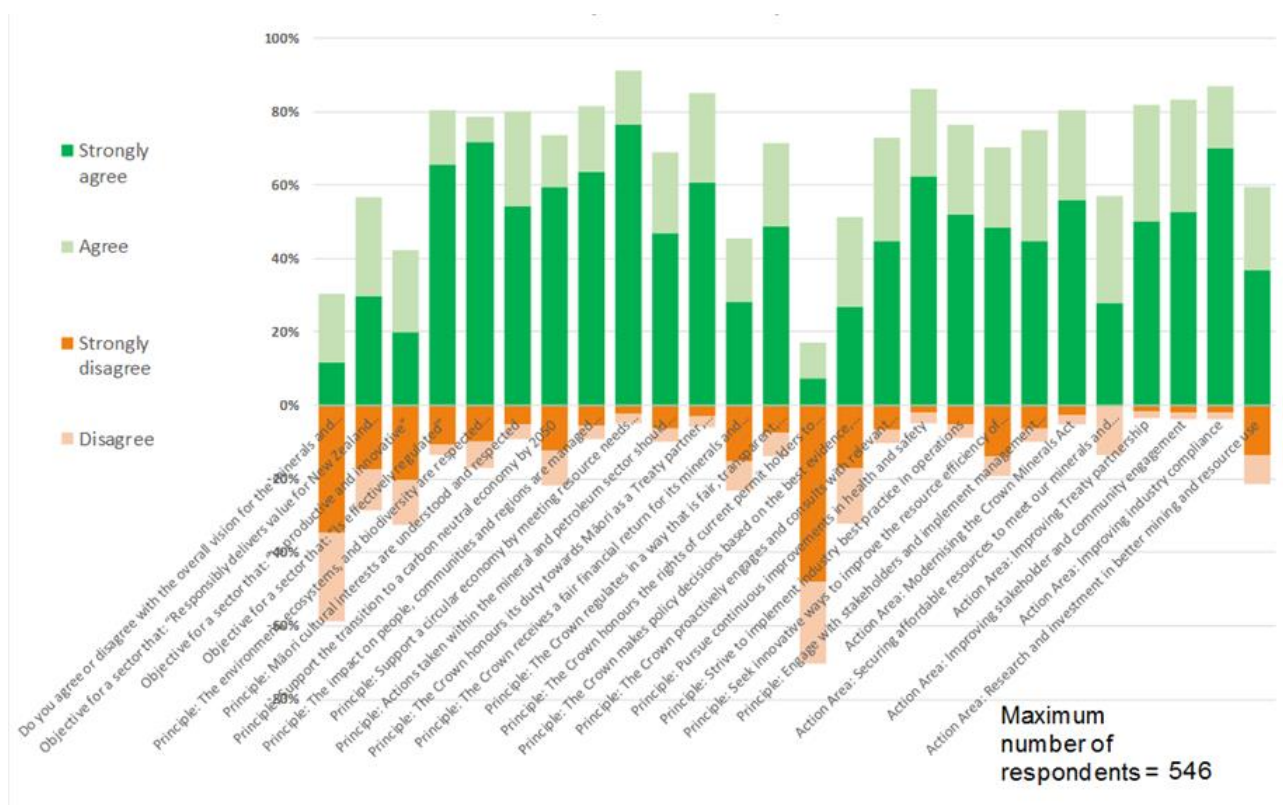


Figure 3: A summary distribution graph of how each submitter responded to each key question posed by the online survey

Key themes and Government response

23. A number of key themes emerged from the submissions we received. We discuss these themes below and include the Government's response. We have noted which submitter groups these themes are mostly attributed to.

Summary of themes	Government response
More focus on moving to renewable energy sources and the recycling and re-use of minerals. (Environmental groups and the general public).	The inclusion in the Strategy of <i>Principle 5: Support a circular economy by meeting resource needs through resource efficiency, recycling and reuse</i> is a step towards greater recycling and re-use of minerals. The Government will continue to explore opportunities to advance the circular economy and encourage renewable energy.
The Strategy should be framed within the context of climate change. (Iwi, environmental groups and the general public)	Responding to climate change is a key factor we considered throughout the drafting of this Strategy. It is reflected in many places, including in Objective 1 which aims for a sector that responsibly delivers value for New Zealand which includes <i>supporting New Zealand's transition to a carbon neutral economy</i> .
The Vision Statement should emphasise socially and environmentally responsible extraction (Iwi, environmental	The Vision Statement now reads "A world-leading <i>environmentally and socially responsible</i> minerals and petroleum sector that delivers affordable and secure resources, for the benefit of current and future New

groups and the general public).	Zealanders”.
The energy trilemma (sustainability, affordability, and security) should be adopted within the Strategy. (Industry groups).	We have now made explicit in the Vision Statement our concern about all dimensions of the energy trilemma through our references to: environmental responsibility, and affordable and secure resources.
The terms used within the Vision Statement are ambiguous and further definition is required, particularly ‘value’ ‘world leading’ and ‘environmentally and socially responsible’ (all submitter groups).	These key terms are now defined in commentary that immediately follows the Vision Statement within the Strategy.
The minerals and petroleum sectors have an important role to play in the provision of essential minerals and in enabling a successful transition to a carbon neutral economy (Industry and research institutes).	The Government recognises the important role that these sectors have to play in the transition to a carbon neutral economy. We have recognised this in several places of the Strategy including Objective 1, b) which aims to build a sector that will support New Zealand’s transition to a carbon neutral economy.
Māori knowledge and experience needs to be utilised (Iwi, environmental groups and research institutes).	The Government agrees with this sentiment, and through Action Area 3: Improving Treaty Partnerships, we will explore ways to incorporate Mātauranga Māori into decision making.
The importance of community engagement on matters related to the extraction of minerals and petroleum (Environmental groups and research institutes).	The Strategy recognises the importance of engaging with the communities that are impacted by minerals and petroleum operations. Through Action Area 4: Improving Community and Stakeholder Engagement we will explore ways to continue improving how the Government engages with communities.
Royalties should be returned to the regions from which the minerals and petroleum are extracted (Environmental groups, iwi and councils).	The Government is not considering this proposal at this time.
Disagreement with the inclusion of oil and gas in the Strategy (Environmental groups and general public).	Oil and gas has a role to play in providing New Zealanders with affordable and secure energy. As we transition to a carbon neutral economy, our reliance on oil and gas will decrease, but until then, we need to manage these resources responsibly.
Disagreement with the inclusion of the mining of minerals in the Strategy (Environmental groups and general public).	While we aim to reduce our reliance on mined material through efficiency and recycling, this reliance cannot be reduced completely. For example, aggregate for roads cannot be fully replaced by recycled material. Accordingly, if we are to deliver affordable and secure resources for New Zealanders, we cannot do away with

	mining.
Disagreement with the inclusion of the No New Mines on Conservation Land policy in the Strategy (Industry groups).	The public will have an opportunity to submit their views on this policy through a separate discussion document which is due to be released in the coming months.
Concern regarding the sequencing of the Strategy and review of the CMA (Industry groups).	The Strategy has been informing, and will continue to inform the review of the CMA. The CMA discussion document is being progressed currently, and insights from the Strategy will inform this document and any future policy recommendations that come out of that process.
Concern around the cumulative impact of simultaneous Government changes on the minerals and petroleum sector (Industry groups).	The Government will continue to look across the range of initiatives that are being progressed and ensure that they are consistent with the vision, objectives and principles of the Strategy.

Figure 4: Table of summary of themes and Government's response

Overview of submissions by submitter group

General public

24. Members of the general public provided 353 submissions. These submissions indicated overall support for a majority of the elements of the draft Strategy (see figure 5). There was an overall desire in submissions for the phase out of fossil fuels. One individual submitter stated that “we need to rapidly phase out the extraction of fossil fuels in order to meet our targets under the Paris agreement and keep the planet habitable for our children and grandchildren”.¹ Another commented, “we need to phase out fossil fuel extraction as soon as possible. There should be no more permits for drilling or extraction as it needs to stay in the ground”.²

¹ Submitter 211

² Submitter 313

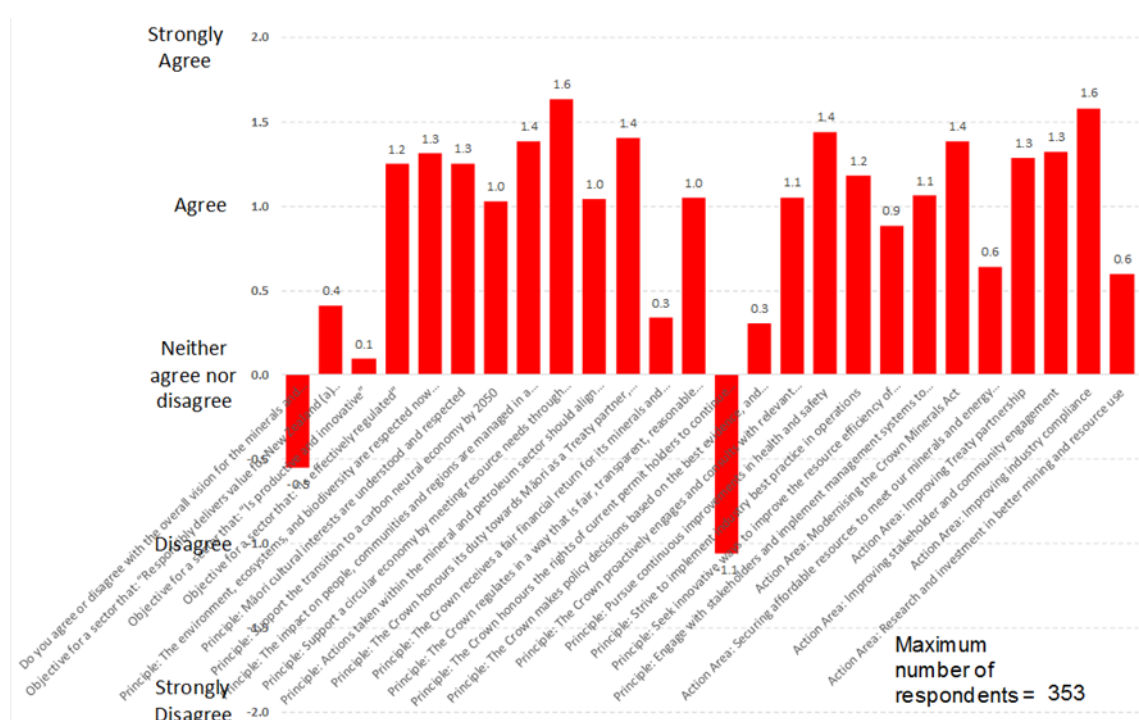


Figure 5: How the general public responded to each question posed by the online survey

25. A number of submitters commented on the need to transition to a circular economy and meeting our mineral needs through re-use and recycling. For example, one submitter commented, "we need to build a circular economy that focuses on recycling and utilising waste resources before new mining for materials for a clean-tech economy".³
26. Many submitters mentioned the importance of the extraction of minerals and petroleum occurring in an environmentally and socially sustainable way. One submitter commented that "unfortunately we still need minerals and petroleum but it is essential that they are extracted and used in an environmentally and socially responsible way until we can replace them entirely".⁴
27. Other submitters commented that it wasn't possible to extract minerals and petroleum in an environmentally and socially responsible way. Another stated that "...there is no such thing as an environmentally and socially responsible minerals and petroleum sector. The only environmentally and socially responsible thing for these people to do is to cease operating".⁵

Iwi

28. We received five submissions from iwi groups and four submissions from individuals who identified as iwi. Overall, iwi submissions were supportive of the draft Strategy (see figure 6). Submissions noted that it is a shift in the right direction and appreciated

³ Submitter 83

⁴ Submitter 207

⁵ Submitter 181

the framing of the Strategy around the threat of climate change, the ‘just transition’ and acknowledging the role the sector plays in the transition.

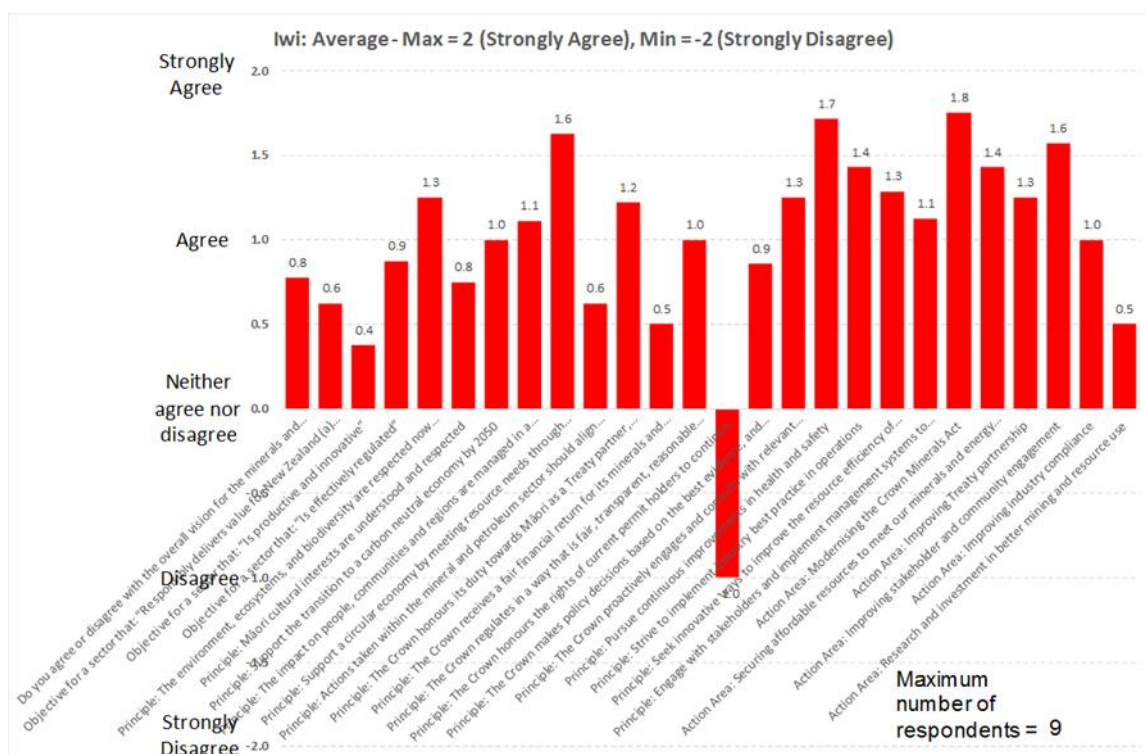


Figure 6: How iwi responded to each question posed by the online survey

29. Many iwi submissions supported the emphasis in the draft Strategy on the Crown honouring its duty to Māori as a Treaty partner and its duty to meet its settlement commitments, improving the ability of Māori to effectively engage and influence the future of mining, and adhering to the principles of the Treaty of Waitangi.
30. Te Korowai o Ngāruahine Trust (Te Korowai) submitted “one area of disappointment for Te Korowai is the Strategy’s lack of attention to the findings and recommendations of Wai 796. Within this Strategy the Crown has the ability to re-consider some of the recommendations with a purpose of redressing some of the resource inequity that has arisen from Māori loss of land”.
31. Many of these submissions also supported a shift to a low emissions future where we lessen our reliance on the minerals and petroleum industries and reduce the effects on our environment.

Minerals Sector

32. Minerals sector organisations and individuals provided 18 submissions on the draft Strategy. The minerals sector indicated broad support for the Strategy (see figure 7⁶), particularly the Strategy’s recognition of the minerals sectors contribution to the wellbeing of New Zealand.

⁶ Note in figure 7 the 18 minerals sector submissions and the 3 quarrying sector responses have been combined as the minerals sector.

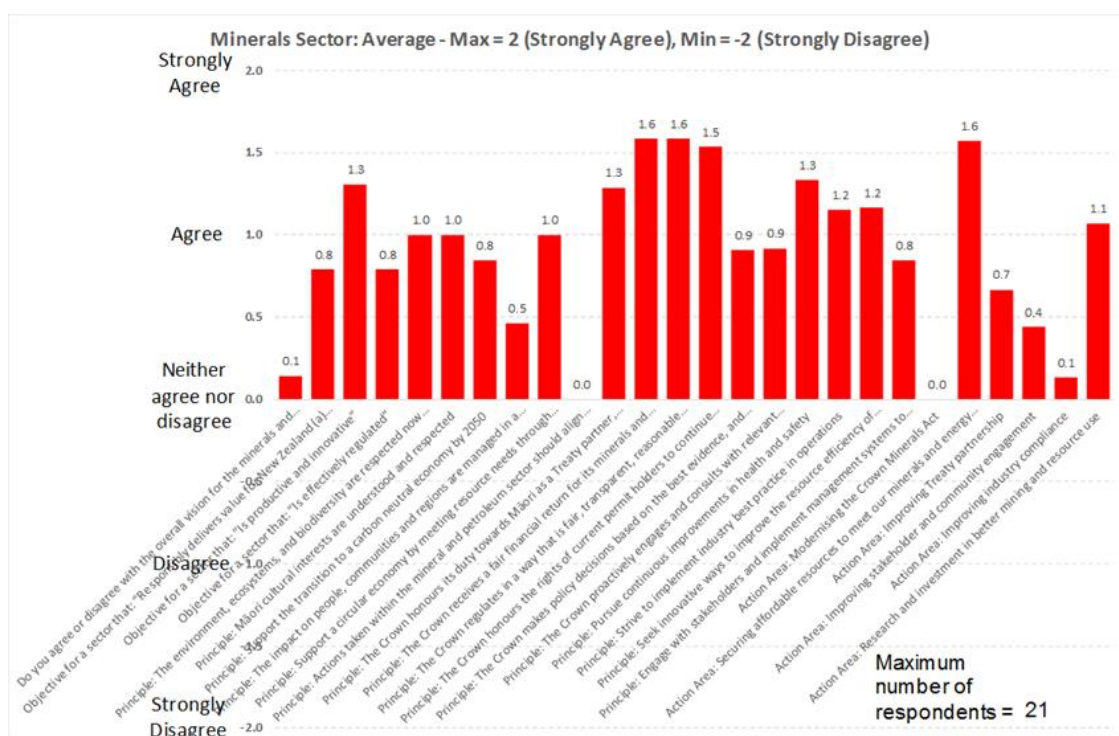


Figure 7: How the minerals and quarrying sector responded to each question posed by the online survey

33. Mineral sector submissions expressed that the Strategy should more strongly emphasise that; the products of mining are essential for modern society, mining contributes significantly to the economy, and mining and protecting the environment are not mutually exclusive. Straterra commented that, "the government could play a role in ensuring that the public is well informed as to the importance of minerals to modern living standards and the need for new minerals for the proposed low carbon economy".
34. Many submissions from the minerals sector expressed opposition to the No New Mines on Conservation Land policy being included in the Strategy, as the policy is still unclear and consultation has not yet been undertaken and is unlikely to occur before the final Strategy is published. New Zealand Coal and Carbon submitted in regards to No New Mines on Conservation Land "we do not believe that this is the correct mechanism to decide what should occur and where, rather this should be on a case by case basis through processes such as land access and resource consents". Reefton Gold Limited commented that "New Zealand has the environmental legislation framework already to ensure that the mining industry can participate and contribute to the economy and country without causing long term damage".
35. OceanaGold believed that more discussion is needed around the role that minerals play in trade and export growth. They also submitted that the export potential of NZ's minerals should be wider than a focus purely on clean-tech mineral opportunities. OceanaGold said "we would expect the strategy to have regard to the benefits of NZ's well respected "clean, green" brand, related environmental initiatives and NZ's capabilities across the wider supply chain".

36. Comments were also made around the desire for 'Principle 10' to include protecting subsequent rights, and all other rights afforded to existing permit holders under the CMA including existing rights.
37. A number of submissions raised concerns about the number of workstreams currently taking place at the moment that could affect the mining sector in New Zealand, with one example being the proposed National Policy Statement on Indigenous Biodiversity. Bathurst Resources Limited/BT Mining Limited commented that "taken together these initiatives (unless significantly modified in their passage through to binding legislation and regulation) will act to prevent almost all productive economic activity outside of urban areas and except perhaps on already heavily modified rural areas". Bathurst go further and say "There is no point to have a Strategy that acknowledges the need for fossil fuels over the medium term if other workstreams act to ensure that those fuels cannot be sourced in New Zealand during the medium term".
38. Trans-Tasman Resources would like to see "investment support for upstream activities because recent government decisions in respect of overseas investment and permits consenting issues faced in NZ are deterring investment from all sources".

Quarrying sector

39. We received three submissions from organisations operating in the quarrying sector. In general, submissions were supportive of the draft Resource Strategy (see figure 4). Overall submissions expressed the importance of aggregate to New Zealand's growth and infrastructure development. For example, the Aggregate and Quarrying Association submitted that "As stated in the strategy, aggregates are critical to growth and infrastructure development and maintenance. Demand is almost totally domestic and currently the only alternative to local extraction and supply of aggregates is to import aggregates to meet demand".
40. One of the major themes coming through was the importance of identifying, understanding and effectively managing local aggregate resources. Fulton Hogan commented "the Government, in consultation with the aggregates sector, needs to confirm the available sources of aggregate and sand throughout the country, including aggregate quality, accessibility, and proximity to markets so that those sources identified as critical for the country's future growth are protected and remain accessible to meet future demand".
41. J Swap Contractors sought to highlight the need to promote a wider understanding across all relevant agencies of the need to accommodate the minerals extraction industry and ensure the overall ambition of the Strategy is achieved. J Swap drew attention to "the impact on the minerals industry of pending development of policies and strategies which seek to discourage and control activities seen to impact adversely on the natural environment, natural land and water features, biodiversity and the historical and cultural landscape".

42. All three submissions acknowledged the importance of a circular economy, and striving to meet more of our resource needs through recycling and re-use of materials. However each reinforced that the technology is nowhere near ready to completely replace the need for extraction of natural aggregates.

Non-governmental organisations

43. We received a total of 19 submissions from non-governmental organisations (NGOs) and 75 submissions from individuals who identified themselves with environmental groups. Figure 8 demonstrates the overall response to each question posed in the online survey. In general, submitters supported the framing of the Strategy around the need to address climate change but felt that it failed to grasp the scale of economic transformation required to meet the climate challenge. Greenpeace commented that “it has long been understood that we cannot afford to burn most of the fossil fuels currently held in reserves, let alone search for more, if we’re to avoid catastrophic climate change”.

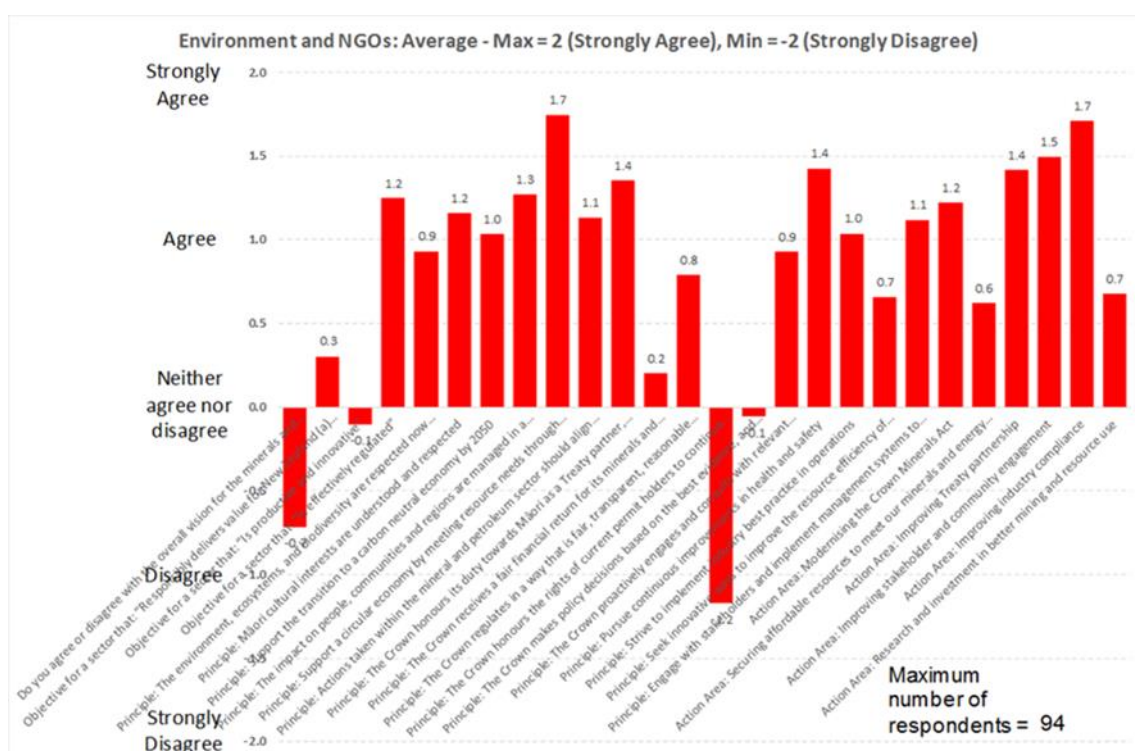


Figure 8: How the non-governmental organisations and individuals who identified themselves with environmental groups responded to each question posed by the online survey

44. Carbon Neutral New Zealand Trust submitted “at minimum the draft strategy must be consistent with Government’s policy on climate change namely to achieve zero carbon by 2050”. Several other submissions echoed this sentiment.
45. Many submitters opposed the fact that the draft Strategy allowed for the continued extraction of fossil fuels. Some felt that the Strategy should include revoking all existing petroleum and coal prospecting, exploration and mining permits and making it

clear that existing permits will not be extended or changed to allow further time for permit operators to meet permit conditions.

46. A number of submissions noted that gas should not be treated as a transition fuel. Greenpeace, for example, stated that “the latest research shows that expanding fossil gas will negatively affect our ability to meet climate targets and transition towards a clean energy system”.
47. There was general emphasis on transitioning to renewable energy sources and meeting our mineral needs through re-use and recycling. Forest and Bird submitted “mining is an inherently environmentally destructive activity, so any responsible future strategy must prioritise a circular economy through reduction of need, reuse and recycling of all minerals”.

Oil and gas sector

48. We received 11 submissions from individuals and groups who identified themselves with the oil and gas sector. In general, submitters supported the development of a Resource Strategy and taking a strategic approach to the management of petroleum and minerals in New Zealand. However, submitters did not think the current Strategy gave appropriate certainty to industry to support investment decisions or sufficiently communicate the importance of oil and natural gas to New Zealand. Figure 9 demonstrates the overall response to each question posed in the online survey.



Figure 9: How the oil and gas sector responded to each question posed by the online survey

49. The Petroleum Exploration and Production Association of NZ (PEPANZ) commented that, “The Resources Strategy should acknowledge that oil and natural gas have a long term role in the global energy mix as well as through their petrochemical uses. Natural

gas in particular is expected to see significant growth in coming decades due to its role in reducing emissions compared to coal and liquid hydrocarbon sources". Todd Energy recommended that the Strategy be amended to include more thorough information about the long-term importance of natural gas, especially as it relates to security of supply. OMV New Zealand submitted "the Strategy does not recognise that petroleum currently provides over half of New Zealand's total energy needs and is predicted to account for more than half of all global energy consumption in 2040".

50. The Major Gas Users Group commented that "the strategy would be better informed if it examined how gas contributes to the economy - who are the users, what do they use gas for, their role and significance to the New Zealand economy, including in the facilitation of lower emissions energies and technologies".
51. Many submitters wanted to see the energy trilemma adopted within the Strategy. Methanex commented that they "see this as a way to reduce disruption to New Zealand's energy security and will ensure we continue to consider all sources of available energy on their differing merits".
52. Submitters expressed support for Action Area 2: 'Securing affordable resources to meet our mineral and energy needs', however, considered that existing Government policies and commitments, such as the limiting of exploration permits to onshore Taranaki, do not support this critical objective.
53. A few submissions mentioned that domestic production should be preferred to imports. For example OMV New Zealand submitted "there is clear evidence that New Zealand's future requires and relies heavily on minerals and petroleum resources and we should look to produce these domestically where it is economically efficient to do so".
54. First Gas submitted that the 10 year horizon proposed in the draft Strategy doesn't usefully support infrastructure planning and investment decisions, suggesting "three time horizons for the Resources Strategy – 10 years, 20 years and 50 years. This approach would help First Gas with its own transitional plans, that is, to plan for an environment where natural gas is progressively blended and replaced by alternatives such as hydrogen and biogas".
55. Several submissions commented that legislation should be enabling of technology such as carbon capture and storage. PEPANZ in particular stated, "the Strategy should promote the development of a regulatory framework to regulate and enable carbon capture and storage in New Zealand".
56. PEPANZ did not support the scope of the Strategy precluding the Crown Minerals (Petroleum) Amendment Act 2018. "The proposed vision of a sector that 'delivers value for New Zealanders' is unlikely to be achieved with about 99.99 per cent of the New Zealand jurisdiction (including the exclusive economic zone) unavailable for permitting". They also considered that the No New Mines on Conservation Land policy should be abandoned.

Research institutes

57. Six submissions were received from research institutes. Figure 10 demonstrates the overall response to each question posed in the online survey. GNS Science submitted that the vision and objectives of the Strategy “align with those of GNS Science, whose core purpose as a Crown Research Institute includes undertaking research that drives innovation and sustainable economic growth in New Zealand’s geologically-based energy and minerals industries”. GNS Science also commented that “New Zealand’s future prosperity depends upon a healthy and dynamic minerals and petroleum sector, both to enable the transition to a carbon neutral economy and to provide the country with the raw materials required to sustain a carbon neutral economy into the far future”.

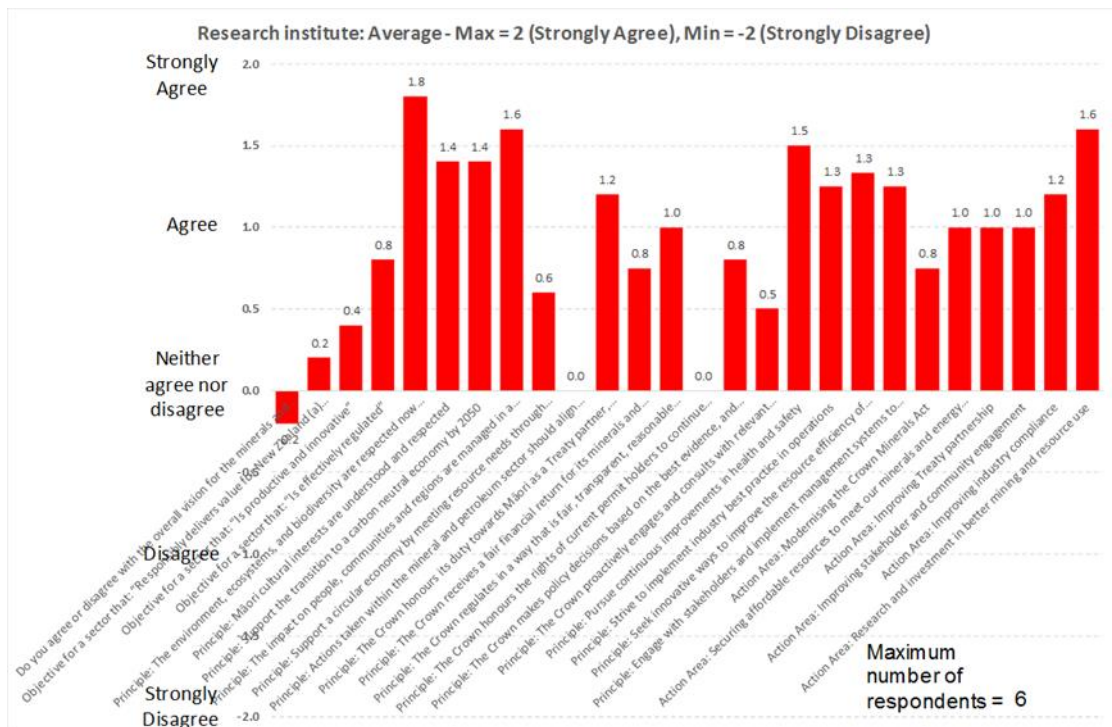


Figure 10: How research institutes responded to each question posed by the online survey

58. CRL Energy submitted that “nuanced and scientifically validated policy decisions are required to deliver the strongest possible minerals sector in New Zealand”. Blanket bans and policy based on perception is quite likely to deliver outcomes that are counter-productive to improved environmental performance or decreasing global carbon dioxide emissions”.
59. Core Conservation raised in their submission that “the only way in which the minerals and petroleum sector could be remotely environmentally and socially responsible would be for the extraction of fuel coal and oil to be reduced rapidly. Other fuel components, such as natural gas and LPG may continue to be extracted at a reducing rate as important transitional fuels. Some minerals may become important in a renewables based economy - such as the so-called rare earths and lithium. And we will continue to need concrete, glass, etc”.

Overview of submissions by section of the draft Strategy

Vision

“A world-leading minerals and petroleum sector that delivers value for New Zealanders, both now and in the future, in an environmentally and socially responsible way”.

Question 8: *Do you agree or disagree with the overall vision for the minerals and petroleum sector in New Zealand?*

60. Responses to the vision statement were mixed, with 35 per cent of submitters strongly disagreeing with the vision statement and 24 per cent disagreeing. Eleven per cent neither agreed nor disagreed. Only 31 per cent of submitters expressed support for the vision statement (see figure 11).

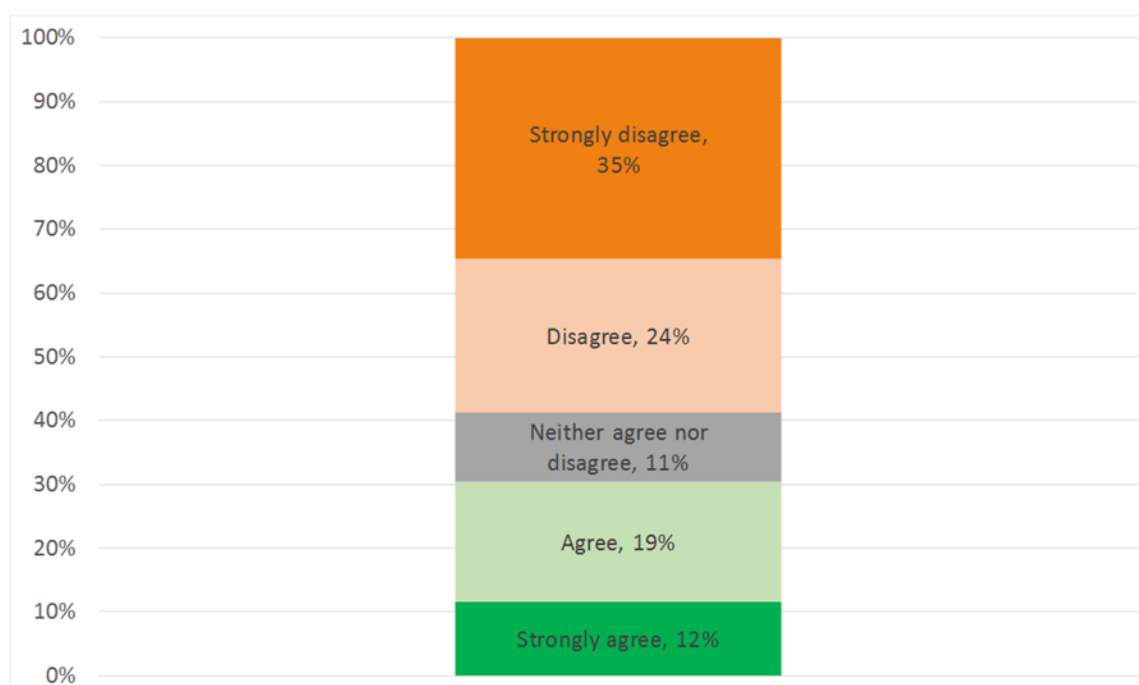


Figure 11: Do you agree or disagree with the overall vision for the minerals and petroleum sector in New Zealand? Overall submitter response

Opposition to the vision statement

61. Overall, individuals from the general public and NGOs were the least supportive of the vision statement (see figure 12). The key reason submitters either disagreed with the vision statement, or neither agreed nor disagreed, was because they considered that continuing to extract oil and gas was not environmentally or socially responsible. For example Fossil Fuels Aotearoa Research Network submitted that “the draft vision statement is based on the untenable proposition that it is possible to explore for and mine fossil fuels in an era of escalating climate crisis in an environmentally and socially responsible way”.

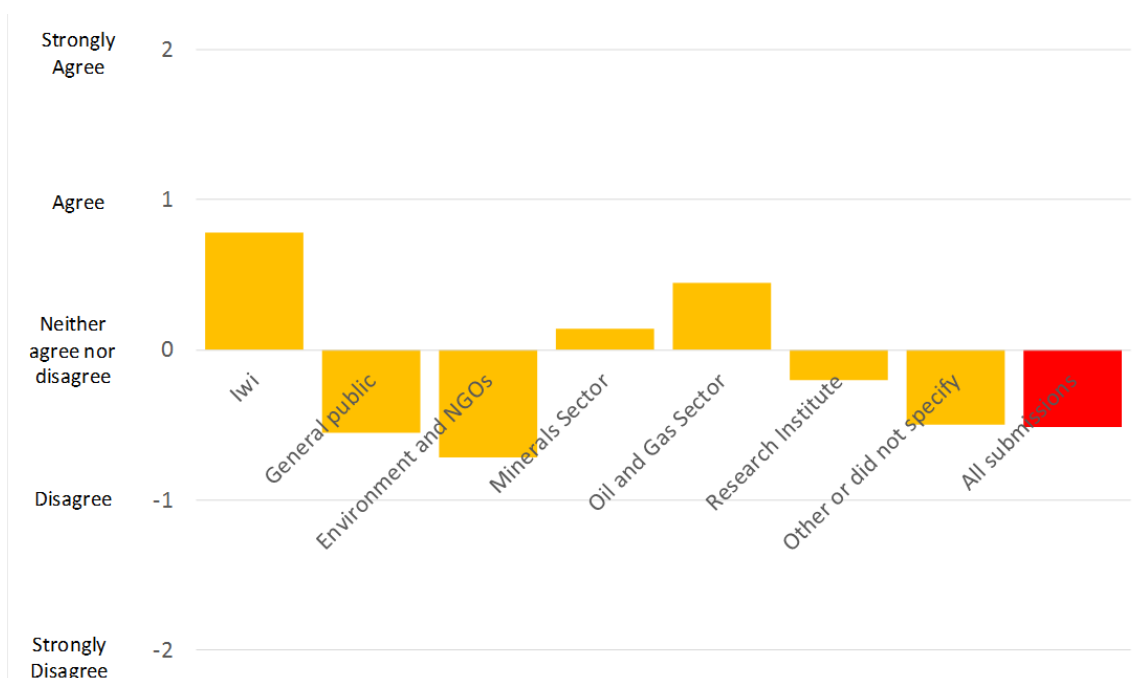


Figure 12: Do you agree or disagree with the overall vision for the minerals and petroleum sector in New Zealand? Positions by submitter group

62. Many submitters referenced climate change or the climate emergency the world is facing. Some mentioned that the emphasis should be on moving to renewables and the recycling and re-use of minerals. The Environment and Conservation Organisation submitted “the focus should be to maximise renewables with low environmental impacts, and maximise the reuse, recycling, recovery of minerals, sand and aggregates, and of plastics etc”.
63. A number of the submitters that opposed the vision statement stated that there should be a separate vision for petroleum and minerals, while others specifically mentioned that they would support the vision if it was for minerals only.
64. A number of submitters who disagreed with the vision statement considered that we should be transitioning away from both the extraction of oil and gas, and minerals because it was unsustainable and neither sector could be environmentally or socially responsible.
65. Some submitters also opposed, or ‘neither disagreed nor agreed’ with the vision statement on the basis that the vision was ambiguous and further definition of the terms used was required. In particular, submitters felt that word ‘value’ needed to be defined. For example, one individual stated in their submission “the statement is meaningless without further definition”.⁷
66. The term ‘world-leading’ was also objected to by some because they considered we should not be world-leading in the extraction of petroleum or minerals, but should be

⁷ Submitter 77

transitioning away from them. Others, such as PEPANZ, objected to this term because they considered it to be unrealistic.

Support for the vision statement

67. Overall, iwi were the most supportive of the vision statement followed by the minerals and oil and gas sectors. Of those who supported the vision statement, the majority emphasised that the most important element of the vision statement was “in an environmentally and socially responsible way”. Although some of these submitters felt more clarity was needed around what “environmentally and socially responsible” actually meant.
68. Te Korowai o Ngāruahine Trust, for example, commented that “the vision is an acceptable statement, but clarity about what ‘socially and environmentally responsible’ means will be important to be able to measure achievement towards and delivery of the vision”.
69. A majority of industry participants and research institutes who commented on the vision broadly supported it, but some, as with those who opposed, felt that ‘delivers value’ was too vague and should be clearly articulated in the document. Some suggested incorporating the energy trilemma in the vision statement, or emphasising the importance of security and affordability of resources. Methanex, for example, recommended “adopting the energy trilemma as a function of the vision. We see this as a way to reduce disruption to New Zealand’s energy security and will ensure we continue to consider all sources of available energy on their different merits”.
70. Some submitters emphasised the important contribution the minerals and petroleum sectors make to the overall wellbeing of New Zealanders, and the important role the sectors have to play in the provision of essential minerals and in enabling a successful transition to a carbon neutral economy. GNS Science submitted that “New Zealand’s future prosperity depends upon a healthy and dynamic minerals and petroleum sector, both to enable the transition to a carbon neutral economy and to provide the country with the raw materials required to sustain a carbon neutral economy into the far future”.

Question 9: *What is your vision for the minerals and petroleum sector in New Zealand?*

71. Responses to this question primarily centred around phasing out fossil fuels, shifting to renewable sources of energy, protecting the environment, minimising the mining of new minerals by increasing the re-use and recycling of minerals, and producing the minerals necessary to support a transition to a low emissions economy. Some specific examples of visions for the minerals and petroleum sector are provided below:
 - Forest and Bird - “A world-leading minerals sector which prioritises a carbon-neutral economy and assists with the future wellbeing of New Zealanders in an environmentally and socially responsible way”.

- The New Zealand branch of the Australasian Institute of Mining and Metallurgy (AusIMM New Zealand) - “the goal needs to be to maximise the contribution of the mining sector to the economy, with due regard to social and environmental impacts”.
- Ngāti Kea / Ngāti Tuarā - “a sector which supports a just transition to a low carbon economy and upholds Crown Treaty of Waitangi obligations”.
- Coromandel Watchdog - “that minerals extraction from the environment is drastically reduced and mining of waste, particularly e-waste become the major focus. Our vision is the end to gold mining in our region and across the country and a thriving ‘urban mining’ industry that extracts minerals from waste products”.
- Condamine Resources - “mineral and petroleum deposits are systematically explored and extracted in an environmentally responsive way to benefit New Zealand”.

Question 10: *How can New Zealand sustainably derive value from its petroleum and minerals resources?*

72. The general themes that emerged included understanding the important role that minerals had to play in a transition to a low emissions economy, emphasising the recycling and re-use of minerals over mining new minerals, the view that New Zealand cannot sustainably derive value from its petroleum resources, phasing out fossil fuels, transitioning the skills and workforce of the petroleum sector into clean energy and technology, minimising the use of minerals and petroleum and investing more in renewables. A few specific examples of responses provided during consultation are set out below:

- GNS Science - “...ensuring there is sufficient and effective exploration to discover new economic deposits, the Crown taking a more proactive ‘Asset Management’ approach to the Petroleum and Minerals estate, greater investment by the government and industry in high-tech critical minerals – both onshore and offshore and greater investment in Data and Geoscience Knowledge and supporting ICT infrastructure”.
- Ngati Tahu-Ngati Whaoa Runanga Trust - “...investigating lithium and other rare minerals provides great opportunities for New Zealand but must be mined in an environmentally sustainable way so further research is required to ensure this is possible when the opportunity arises”.
- Coal Action Network Aotearoa - “...this is a completely irresponsible question in the current context of the climate crisis. In the shift to a wellbeing economy, it must be recognised that the environmental, social and cultural (and long term economic) damage from mining fossil fuels is far greater than any economic value”.

- An individual from the general public - “the best we can do is lead into new energy sources, recycling and reusing minerals that have already been mined, instead of mining for new ones and transitioning as quickly as possible into a circular economy that produces no waste and as little harm as possible to our planet”.⁸

Objectives

Do you agree or disagree with each of the following objectives for the minerals and petroleum sector?

73. Questions 11 through to 14 asked for submitters’ views on each objective of the Strategy and whether there were any other objectives they would like to be considered for inclusion in the Strategy. As figure 13 below highlights, there were varying levels of support for the objectives, with strongest consensus on agreeing with the sector being effectively regulated.

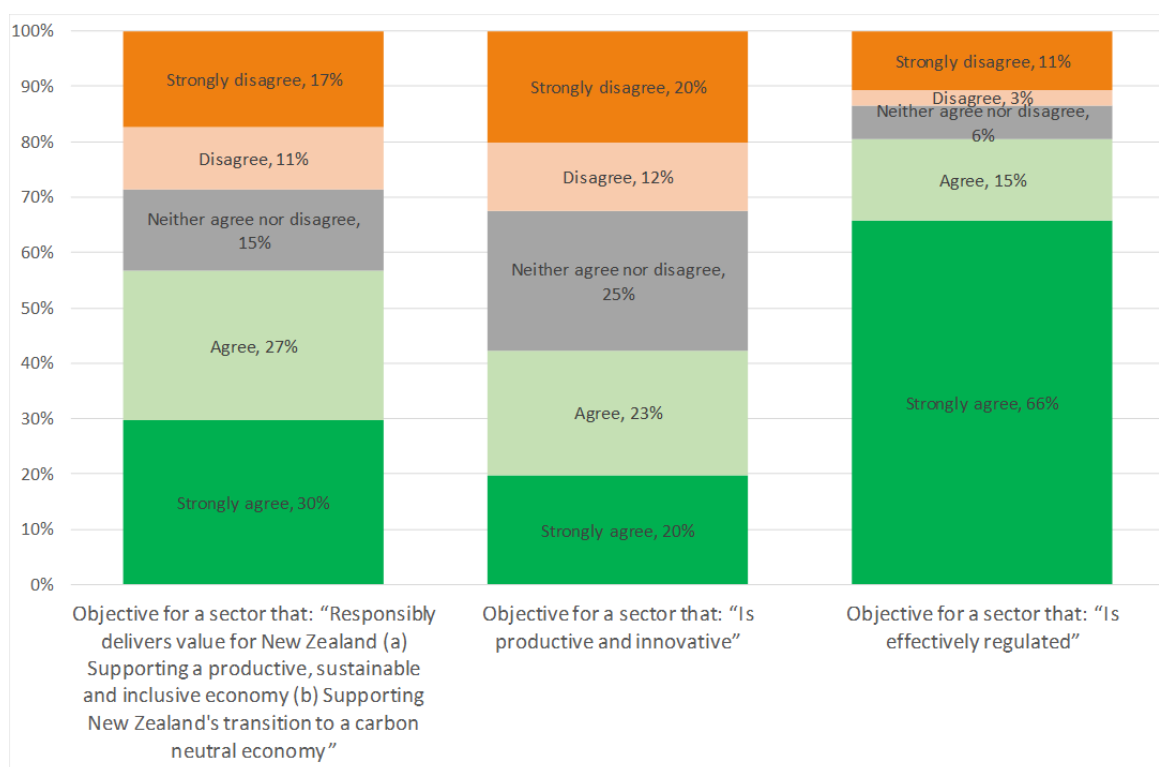


Figure 13: Overall submitter response to each objective of the Strategy

Question 11: Do you agree with an objective for a sector that: *Responsibly delivers value for New Zealand (a) Supporting a productive, sustainable and inclusive economy (b) Supporting New Zealand’s transition to a carbon neutral economy*?

74. This objective generated support from 57 per cent of submitters, in particular industry groups as figure 14 shows, with 15 per cent neither agreeing nor disagreeing. The majority of submitters whom supported this objective did so because they consider it to be important that we transition to a low emissions economy. A number of

⁸ Submitter 2

submitters mentioned climate change and the need to transition away from oil and gas.

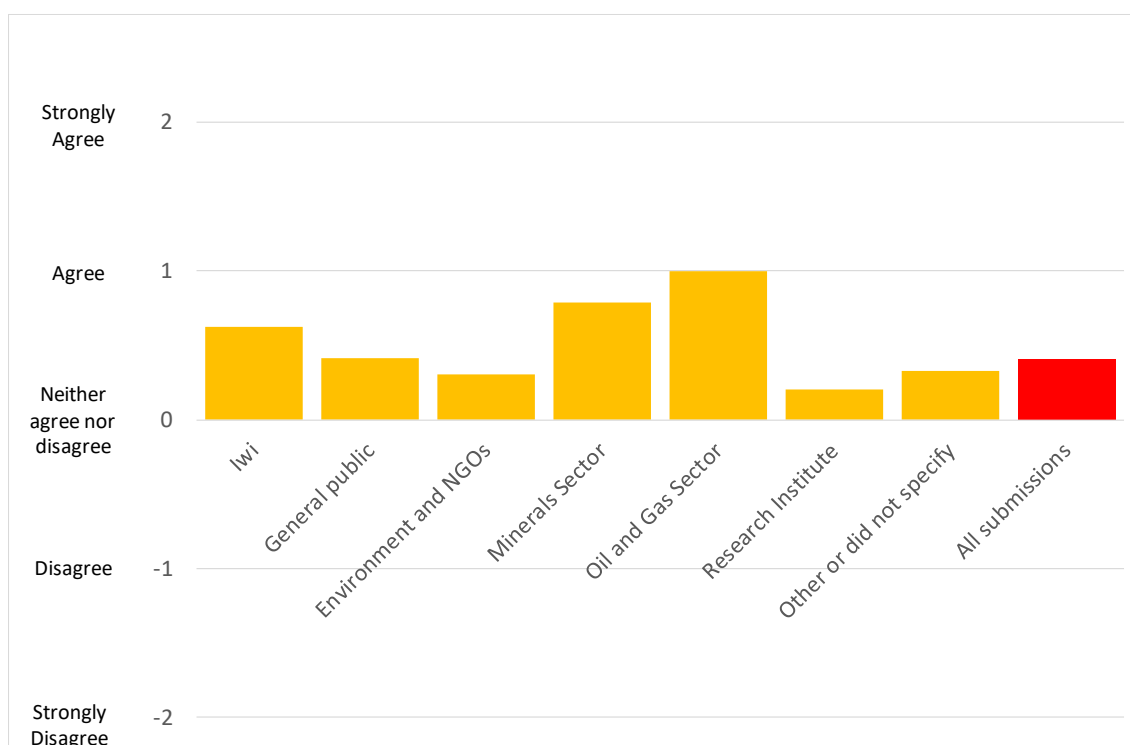


Figure 14: Do you agree with an objective for a sector that: Responsibly delivers value for New Zealand (a) Supporting a productive, sustainable and inclusive economy (b) Supporting New Zealand's transition to a carbon neutral economy? Positions by submitter group

75. Some submitters stated specifically that supporting a transition to a low emissions economy was more important than supporting a productive, sustainable and inclusive economy. For example, one individual submitter stated “I agree with the move to a carbon neutral economy but there is still too much focus on short term economic factors. We need a bolder, more aggressive action to decarbonise our economy and show leadership to Australia and other slow moving countries”.⁹
76. A number of submitters mentioned that a successful transition to a low emissions economy depends on the minerals and petroleum sector. For example, Straterra submitted that “what is often overlooked by many is that the minerals sector has a role to play in the successful transition to a low carbon future. Some of the enablers of a global, lower emissions future – windmills, solar panels, electric vehicles and batteries – all require large quantities of minerals”.
77. A majority of the submitters who disagreed with this objective emphasised that we should be transitioning away from the extraction of oil and gas. Coromandel Watchdog of Hauraki submitted that “petroleum cannot responsibly deliver value, it can only continue to build risk from emissions, it’s a huge challenge to shift away from an oil

⁹ Submitter 213

dependent economy and society but we must do this and Government should be leading with strategic thinking”.

78. Several submitters commented that the aim of being carbon neutral was insufficient and we should be aiming to be carbon negative. Others, alongside the majority of those who neither agreed nor disagreed with the objective, supported part B of the objective but were opposed to part A, primarily because fossil fuels are not sustainable or we should be transitioning away from them.

Question 12: Do you agree with an objective for a sector that: *“Is productive and innovative”*?

79. This objective received the weakest support with 43 per cent either strongly agreeing or agreeing, while 25 per cent neither agreed nor disagreed. Figure 15 demonstrates support by each submitter group. A majority of those who supported this objective emphasised that innovation was essential in order to be able to successfully transition to a carbon neutral economy. An example of this is from an individual submitter who stated it “primarily has to be innovative. We desperately need investment and research and development to move away from fossil fuel dependence to a carbon neutral economy”.¹⁰

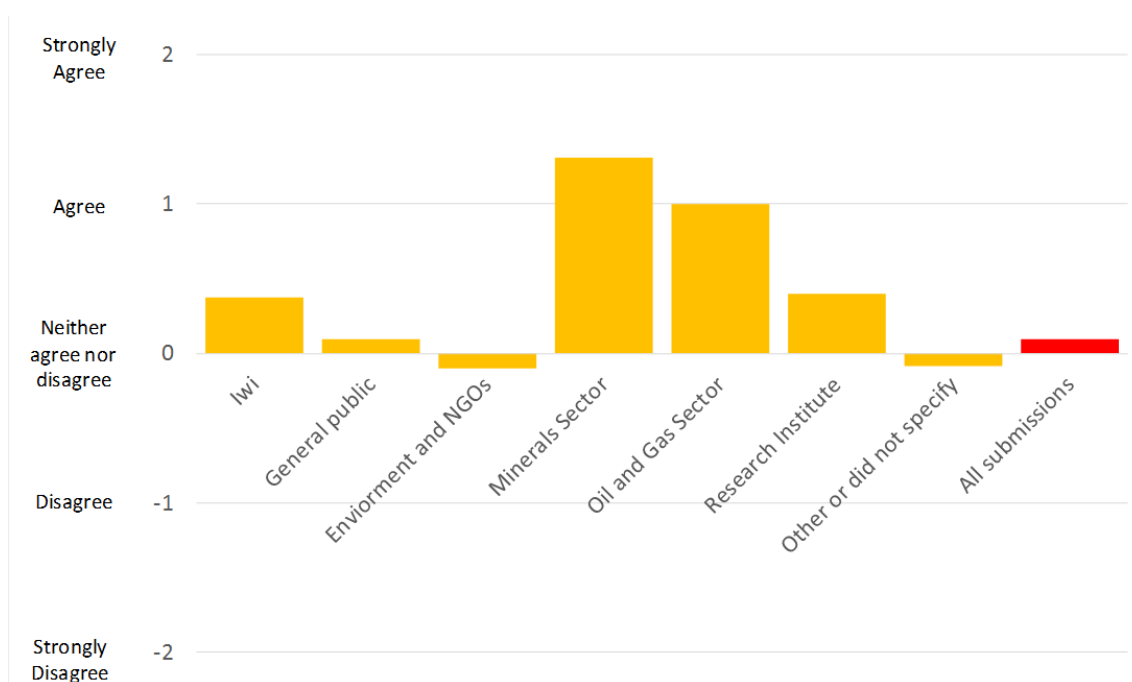


Figure 15: Do you agree with an objective for a sector that: “Is productive and innovative”? Positions by submitter group

80. A majority of those who supported this objective emphasised that innovation was essential in order to be able to successfully transition to a carbon neutral economy. One example of this is from an individual submitter who stated it “primarily has to be

¹⁰Submitter number 229

innovative. We desperately need investment and research and development to move away from fossil fuel dependence to a carbon neutral economy”.¹¹

81. Methanex submitted that “a productive and innovative petroleum sector is key to getting the most value out of our resources whilst reducing emissions. However, a strategy that targets the sector being phased out over time does not create a setting for this to occur”.
82. Submitters that neither agreed nor disagreed with the objective did so largely because they opposed the productive element of the objective, or wanted to see oil and gas extraction phased out. Again, submitters commented that they wanted to see innovation towards alternatives to oil and gas.
83. Comments from those who disagreed with the objective were predominantly concerned with phasing out oil, gas and coal, emphasising that we should be transitioning away from it, or not making the sector more productive. Coal Action Network Aotearoa, for example, stated “a productive sector, in relation to coal, is again absolutely irresponsible. We can (and must) be innovative beyond continuing a reliance on fossil fuels”. Others wanted the focus to be on renewable resources in addition to reusing and recycling waste products.

Question 13: Do you agree with an objective for a sector that: “Is effectively regulated”?

84. This objective was strongly supported by submitters with 66 per cent strongly agreeing and 15 per cent agreeing. Figure 16 demonstrates that this objective was well supported across each submitter group. Submitters made a range of comments around the importance of having a well-regulated minerals and petroleum sector. The Aggregate and Quarrying Association stated that “...regulation must balance the demand for resources, the location and availability of resources with environmental and socially acceptable standards”. Some considered that effective regulation was essential to a successful transition to a carbon neutral economy. Others wanted the petroleum sector and/or minerals sector regulated out of existence.

¹¹Submitter number 229

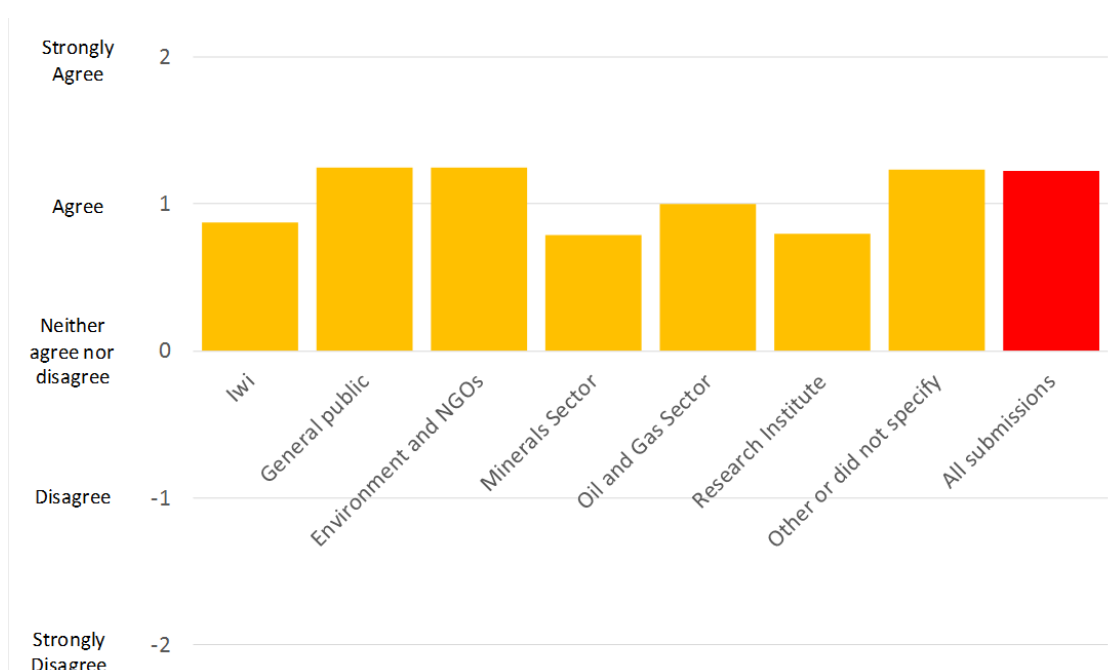


Figure 16: Do you agree with an objective for a sector that is: “effectively regulated”? Positions by submitter group

85. A number of submitters considered that the petroleum and minerals sector was currently not effectively regulated and stronger regulation was required. Forest and Bird commented that “The current regulatory system does an extremely poor job of considering mining’s environmental impacts, which compared with other land uses, are severe and long term”.
86. A number of submitters disagreed with this objective. Comments ranged from considering the petroleum industry to be largely self-regulated, stating that effective regulation of the petroleum industry is impossible, that regulators are captured by industry, and others questioning who would actually do the regulation.

Question 14: *Are there any other objectives for the minerals and petroleum sector that you would like us to consider in the Strategy?*

87. Proposed objectives primarily centred around phasing out fossil fuels, shifting to renewables, encouraging recycling so that less raw materials are used, or ending the extraction of petroleum and minerals in New Zealand altogether. Some specific examples of suggested objectives are included below:
- Te Korowai o Ngāruahine Trust proposed an additional objective of “A sector that is: culturally competent and responsible”.
 - AusIMM New Zealand suggested two additional objectives be included, the first being “recognition of the increased role of the minerals that support the new low emissions energy production technologies” and the second “to seriously investigate CO2 sequestration technology and solutions in NZ to support on-going utilisation of possible fuels, including lignites, during and beyond the transition to zero-carbon economy”.

- ECO suggested several additional objectives including “the end to fossil fuel exploration and mining” and “to shift to promoting resource recovery, reuse, recycling and substitution of low environmental impact product and processes”.
- RSC Mining & Mineral Exploration Limited suggested two additional objectives including “working more closely with the regions to support their understanding of their mineral potential, the regional economic development potential and the potential positive influence the minerals or petroleum sector could have on environmental protection or community development aspirations”.

Guiding Principles

Principles to guide everyone

Do you agree or disagree with each of the following principles to guide everyone (including the Crown and industry)?

88. Questions 15 through to 20 asked for submitters’ views on each of the principles to guide everyone in the Strategy. Figure 17 presents an overall breakdown of the support expressed for each of these principles.

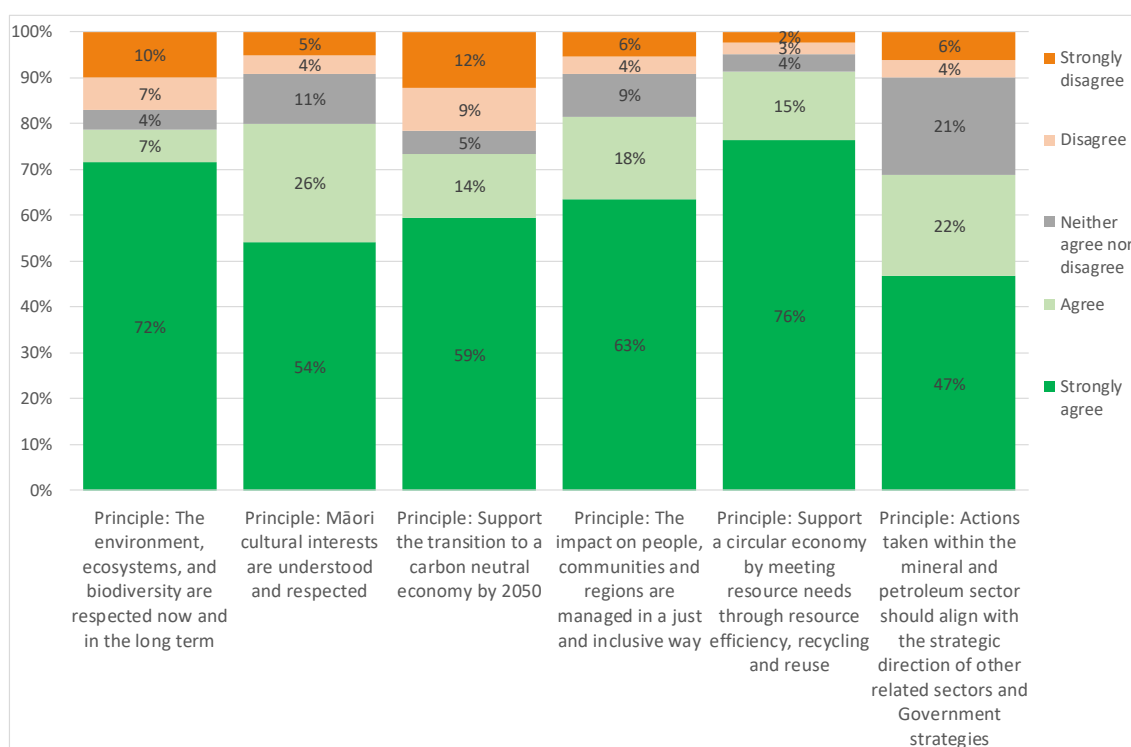


Figure 17: Overall submitter response for each of the principles to guide everyone

Question 15: *Do you agree with this principle: The environment, ecosystems, and biodiversity are respected now and in the long term?*

89. As figure 18 shows, this principle was widely supported with 79 per cent of submitters strongly agreeing or agreeing. These supporters emphasised the importance of

safeguarding the environment and ensuring sustainability. A number of comments also referred to upholding the wellbeing of all species.

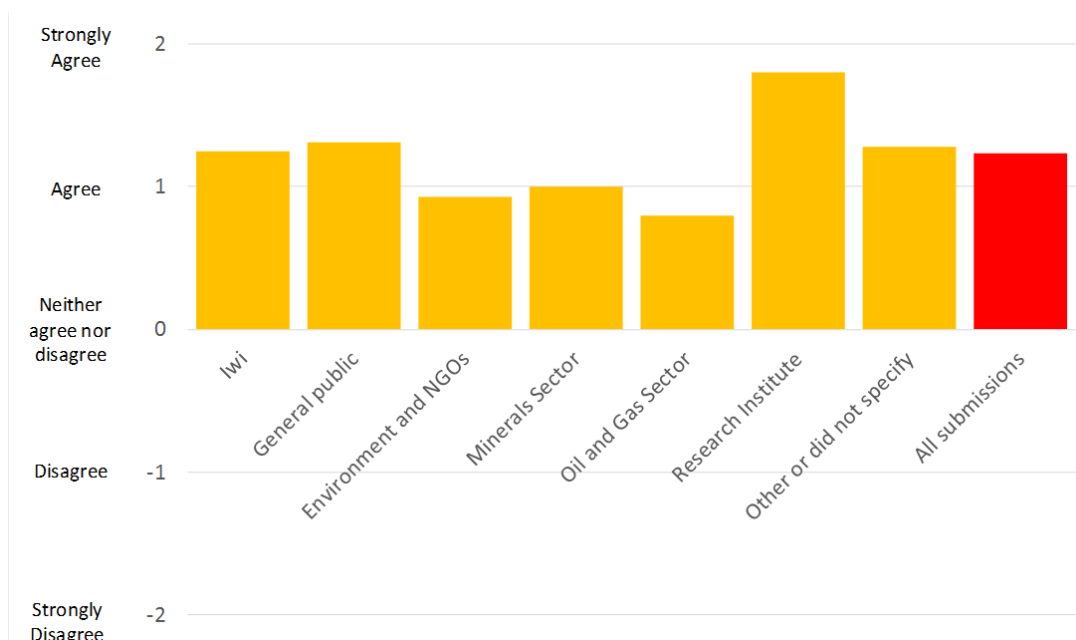


Figure 18: Do you agree with this principle: The environment, ecosystems, and biodiversity are respected now and in the long term? Positions by submitter group

90. Many submissions requested that the wording of this principle be strengthened, in particular, ensuring the environment, ecosystems, and biodiversity are *protected*, rather than just respected.
91. Some submitters raised issues of poor past practice in this area. For example, one submitter believed that “The land, water and sea within and surrounding NZ is continually being degraded by over-exploitation”.¹² Those that disagreed with this principle generally did so on these grounds.

Question 16: *Do you agree with this principle: Māori cultural interests are understood and respected?*

92. This principle was widely supported with 80 per cent of submitters strongly agreeing or agreeing. Figure 19 represents support by submitter group. Many comments cited the Treaty of Waitangi, the partnership role with Māori, and the importance of Māori knowledge and culture for sustainability and managing environmental impacts.

¹² Submitter 32

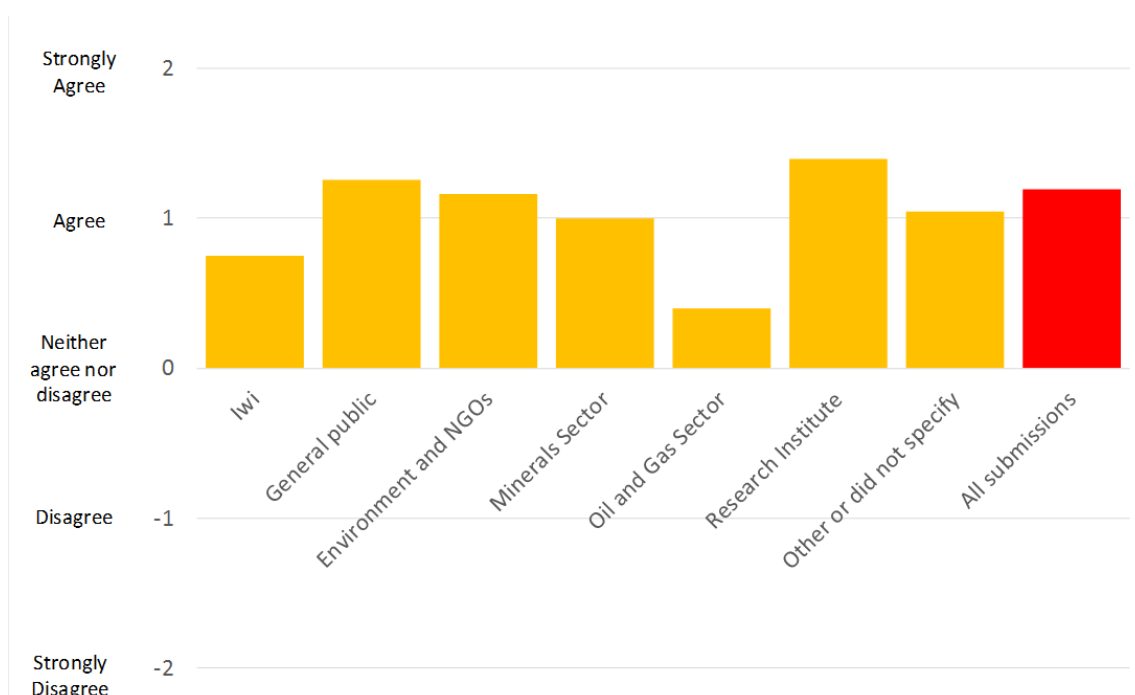


Figure 19: Do you agree with this principle: Māori cultural interests are understood and respected? Positions by submitter group

93. Some submitters, in particular those who disagreed with this principle, argued that Māori interests are not currently understood and respected and there has been poor past practices or injustices on behalf of the Crown. A number of submissions related to the comment made that “Tangata Whenua are not being respected when their land is being mismanaged and polluted”.¹³
94. The issue of Crown ownership of minerals was also raised by a number of individual submitters. Related to this were some comments that centred on Māori desires to support sector activities for economic benefit. For example, RSC Mining and Mineral Exploration noted that “Maori economic objectives should also be considered”.

Question 17: Do you agree with this principle: Support the transition to a carbon neutral economy by 2050?

95. There was a very strong key theme among submissions on this principle, see figure 20, with many individual submissions requesting that the transition target be earlier, many suggesting specific dates of 2030 or 2040. This was irrespective of whether they stated that they were in agreement or not (although 74 per cent strongly agreed or agreed). Many submitters referenced research and reports by the Intergovernmental Panel for Climate Change to emphasise the need for faster action.

¹³ Submitter 11

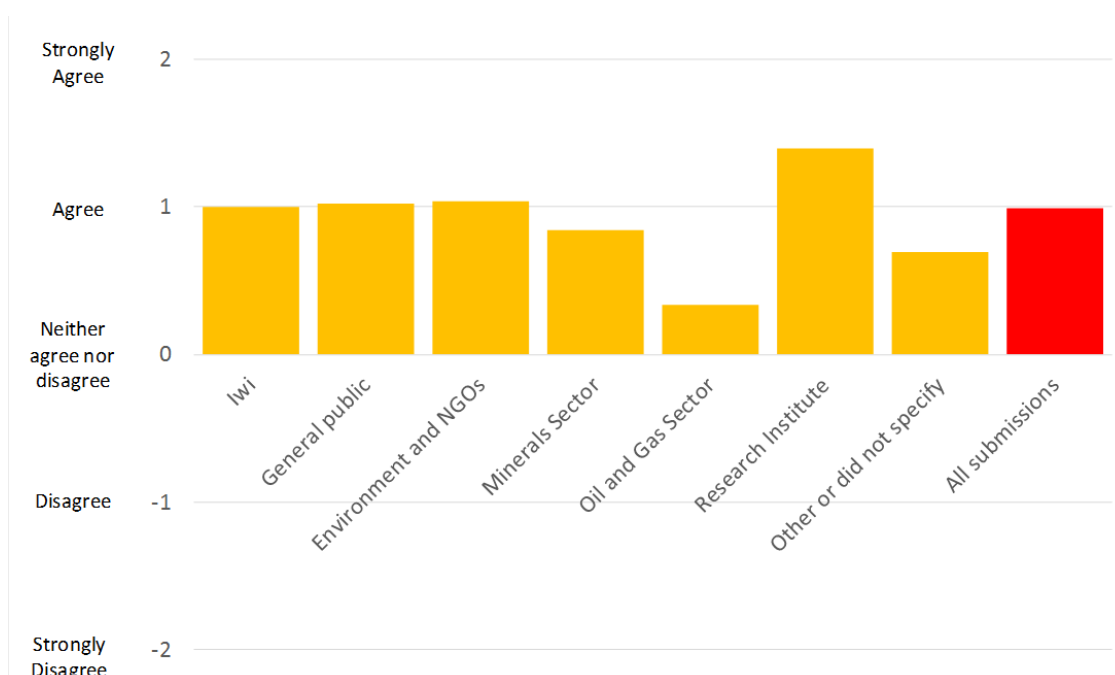


Figure 20: Do you agree with this principle: Support the transition to a carbon neutral economy by 2050? Positions by submitter group

96. Some submitters who expressed support emphasised the need for a smooth, just transition considering “the lower economic members of society” and “future generations”.¹⁴ E tū proposed that a “Just Transition for the current workforce must be at the forefront of the strategy...”
97. A number of comments referenced renewables as a viable means of transitioning to a low emissions economy. Contrastingly, a number of industry participants argued in favour of extracted resources to help with the transition. A handful of individual submissions also expressed support for this view, one stating that New Zealand should “Let the market decide”.¹⁵
98. Those who disagreed with this principle, again primarily on the basis of seeking a faster transition, often made strong statements in favour of more drastic action to transition the economy. One submitter argued that New Zealand is “not doing enough and needs to push for immediate action”.¹⁶ Other submitters also pushed for the faster phasing out of fossil fuels and extractive activities.

Question 18: *Do you agree with this Principle: The impact on people, communities and regions are managed in a just and inclusive way?*

99. This principle was widely supported by 81 per cent of submitters, across all submitter groups (see figure 21). Submissions tended to cite issues of inequality, with concerns that climate change and the transition will disproportionately affect those in lower socioeconomic positions. One submission summed up a number of comments well

¹⁴ Submitter 261

¹⁵ Submitter 16

¹⁶ Submitter 11

saying, “processes must be just – inclusive – transparent – well managed and with impeccable communication”.

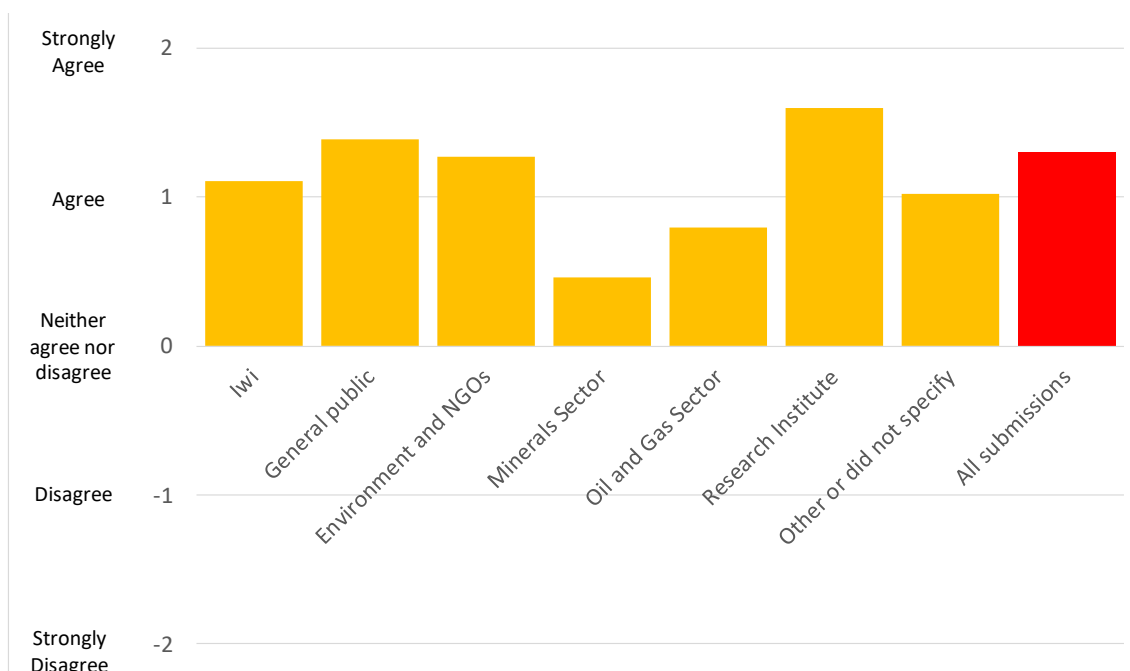


Figure 21: Do you agree with this Principle: The impact on people, communities and regions are managed in a just and inclusive way? Positions by submitter group

100. Supporters also emphasised the need for royalties to reach communities so citizens can reap the benefits. One submitter stated this is “necessary for local communities to buy into any sort of development”.¹⁷ There were also calls for consultation at every level with the inclusion of communities in decision making processes. Contrastingly, some industry participants believed sufficient consultation is occurring. OceanaGold stated that “There is consultation at every level from government through to local government required by our industry”.¹⁸
101. Many who disagreed with this principle discussed poor past practice, with views that economic considerations are being placed before people. Coromandel Watchdog of Hauraki commented that after 40 years of engagement in the Hauraki Coromandel, they “have even less ability to negotiate impacts than 10 years ago”. A number of critics argued that royalties and benefits have not been shared with local communities.

Question 19: *Do you agree with this principle: Support a circular economy by meeting resource needs through resource efficiency, recycling and re-use?*

102. This principle was widely supported across all submitter groups, with 91 per cent of submitters strongly agreeing or agreeing (see figure 22). Key themes arose regarding the importance of recycling and reducing our waste in pursuit of a circular economy. One statement reflecting this is “recycling reduces the need for extracting minerals from the ground and the associated adverse effects on the environment”. Some

¹⁷ Submitter 17

¹⁸ Submitter 7

submitters suggested that there should be a standalone strategy to achieve a circular economy.

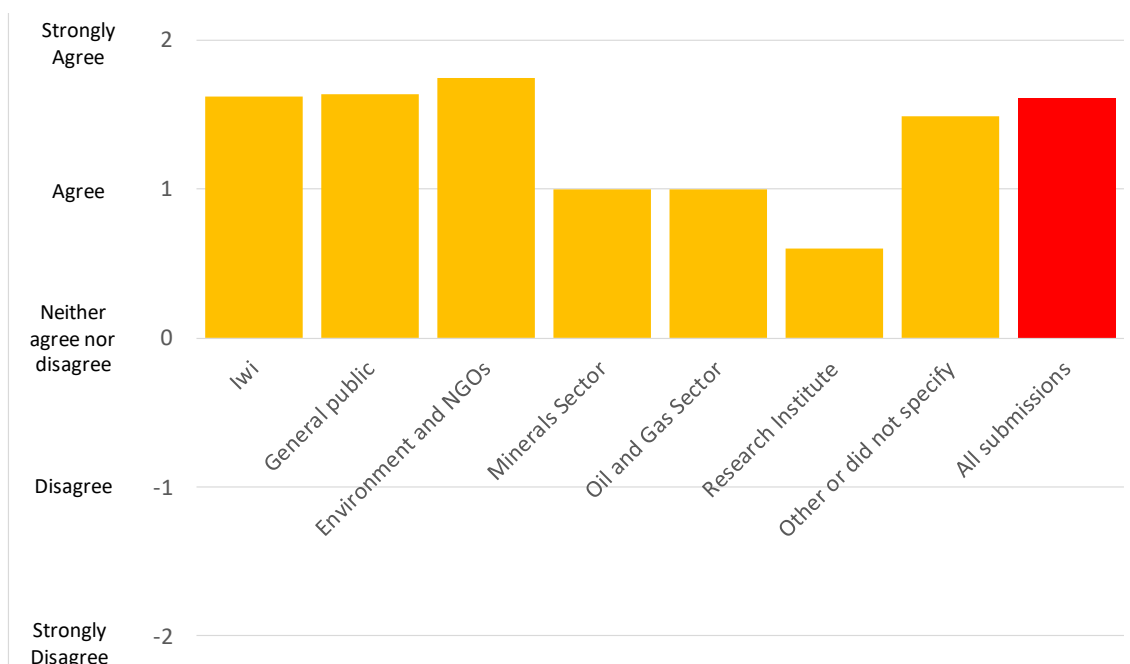


Figure 22: Do you agree with this Principle: Support a circular economy by meeting resource needs through resource efficiency, recycling and re-use? Positions by submitter group

103. Some submitters who supported this principle also wanted the Strategy to acknowledge that there were limits to recycling and re-use. E tū, for example, commented that it is not feasible to only use recycled minerals in the production of steel as it puts at risk the integrity of the steel. AQA stated that “technology is nowhere near ready to fully replace the need for extraction of natural aggregates”.¹⁹
104. Those who disagreed with this principle did so with the view that it is not possible to achieve a circular economy if we continue to extract and depend on fossil fuels. Many argued that reusing and recycling are “curative measures” and we must first reduce and prevent impact by the extractive industries. The Core Conversations group held this view saying it is “Hard to see this as a valid principle for what is, essentially, a purely extractive sector”.

Question 20: *Do you agree with the Principle: Actions taken within the mineral and petroleum sector should align with the strategic direction of other related sectors and Government strategies?*

105. This principle was supported by 69 per cent of submitters. Many who agreed provided that sustainability, climate change and environmental considerations should take primacy in all actions made by Government and industry. Submitters from the minerals sector, oil and gas sector and research institutes did not provide a specific response either way in regards to the principle (see figure 23).

¹⁹ Submitter 517

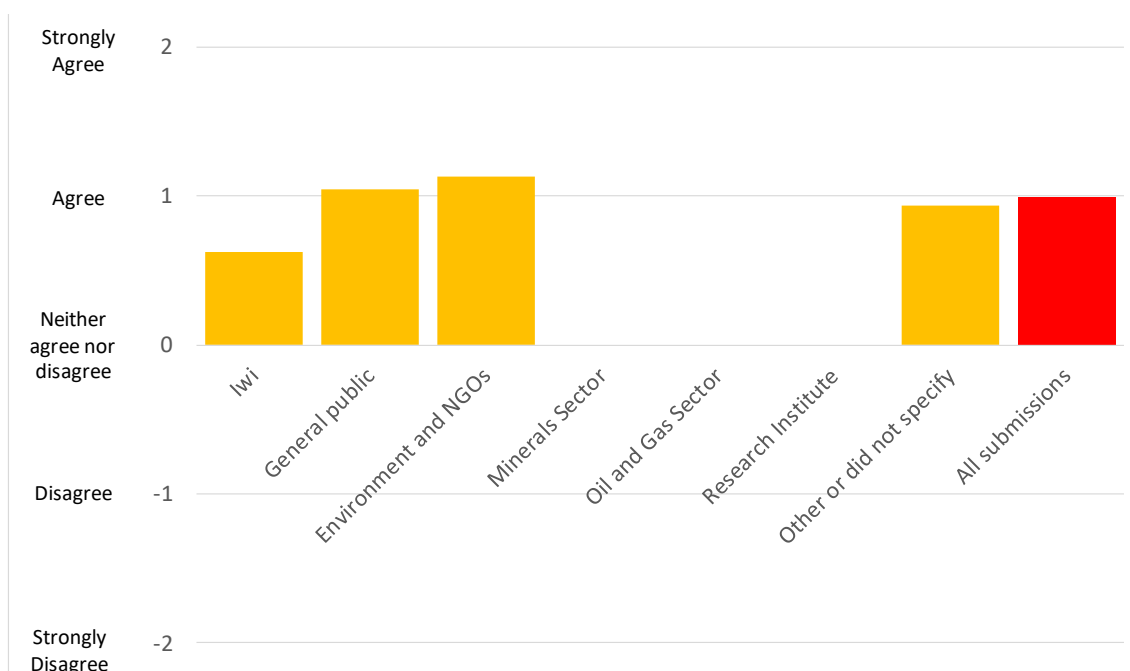


Figure 23: Do you agree with this Principle: Actions taken within the mineral and petroleum sector should align with the strategic direction of other related sectors and Government strategies? Positions by submitter group

106. Stronger comments were made in regards to phasing out the use of fossil fuels, giving the Crown more direct control over the petroleum and minerals sector, or ending the extractive industries altogether.
107. Many who disagreed cited concerns with the lack of current action by the Government and industry. One individual argued we have a “very destructive goal of trying to achieve infinite growth on a finite planet”.²⁰ Many stated the Government is not taking a strong enough stance on climate change issues, while others felt all sectors must adhere with climate change goals, as well as Treaty obligations.
108. A number of industry groups disagreed with this principle on the grounds that aligning activities with Government objectives may hinder operations. Methanex held the view that, “Introducing a principle that requires independent organisations to align themselves to a political agenda (as opposed to meet legal compliance) seems undemocratic and would be a shift in the operating norms of our country”.²¹

Principles to guide the Crown

Do you agree or disagree with each of the following principles for the Crown?

109. In questions 21 through to 26, MBIE asked for submitters views on each of the principles to guide the Crown in the Strategy. Figure 24 presents an overall breakdown of the support expressed for each of these principles.

²⁰ Submitter 149

²¹ Submitter 515

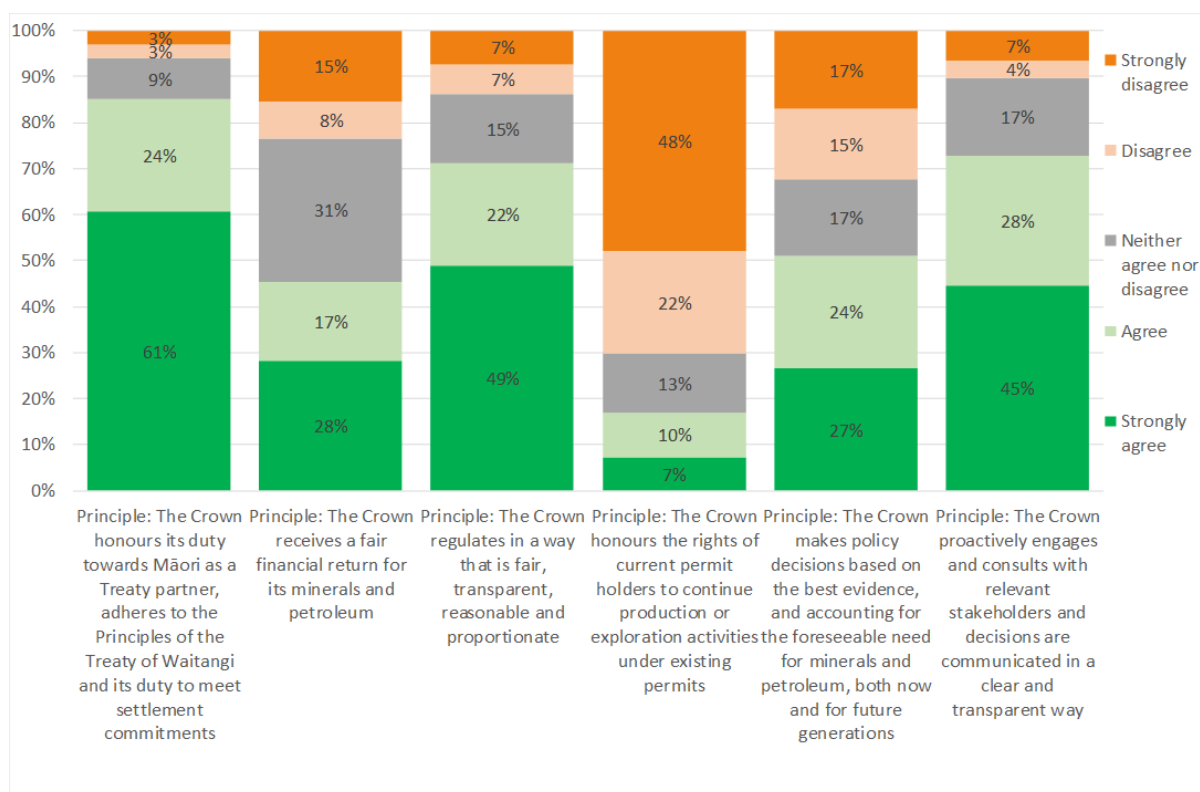


Figure 24: Overall submitter response for each of the principles to guide the Crown

Question 21: Do you agree with the *Principle: The Crown honours its duty towards Māori as a Treaty partner, adheres to the Principles of the Treaty of Waitangi and its duty to meet settlement commitments*?

110. This principle was widely supported with 85 per cent of submitters strongly agreeing or agreeing, see figure 25. Similar to principle two, many comments cited the Treaty of Waitangi and the importance of upholding the partnership with Māori. Others communicated the importance of Māori knowledge and culture for sustainability and managing environmental impacts. One submitter stated that Māori hold “a greater total environmental understanding”²² than others, so their perspective must be fully integrated.

²² Submitter 282

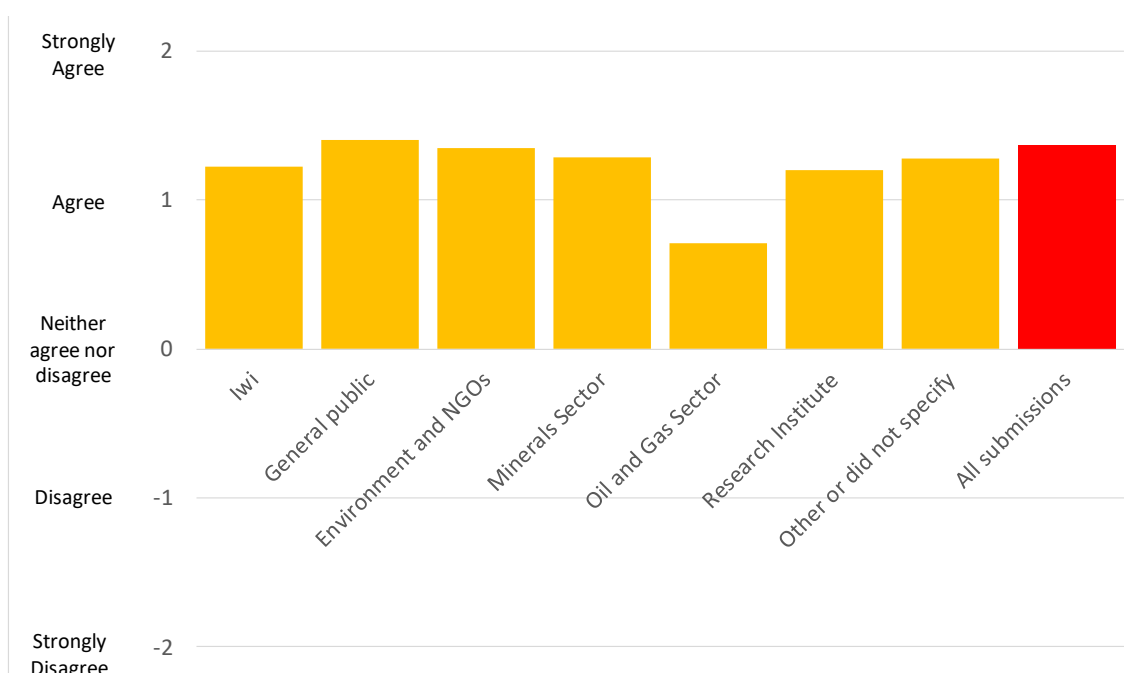


Figure 25: Do you agree with this Principle: The Crown honours its duty towards Māori as a Treaty partner, adheres to the Principles of the Treaty of Waitangi and its duty to meet settlement commitments? Positions by submitter group

111. Those that disagreed generally raised past poor practice and/or injustices on behalf of the Crown. This includes a lack of meaningful engagement, breaching the Treaty, and the Crown's assumed sovereignty over resources and decision making. Others disagreed on the basis that the environment should come first, and that Māori groups, alongside the rest of society, may need to make sacrifices.

Question 22: *Do you agree with the principle: The Crown receives a fair financial return for its minerals and petroleum?*

112. This was a highly contested principle in the Strategy with 45 per cent agreeing, 23 per cent disagreeing and 31 per cent neither supporting nor opposing. The minerals sector offered the most support for this principle, see figure 26.

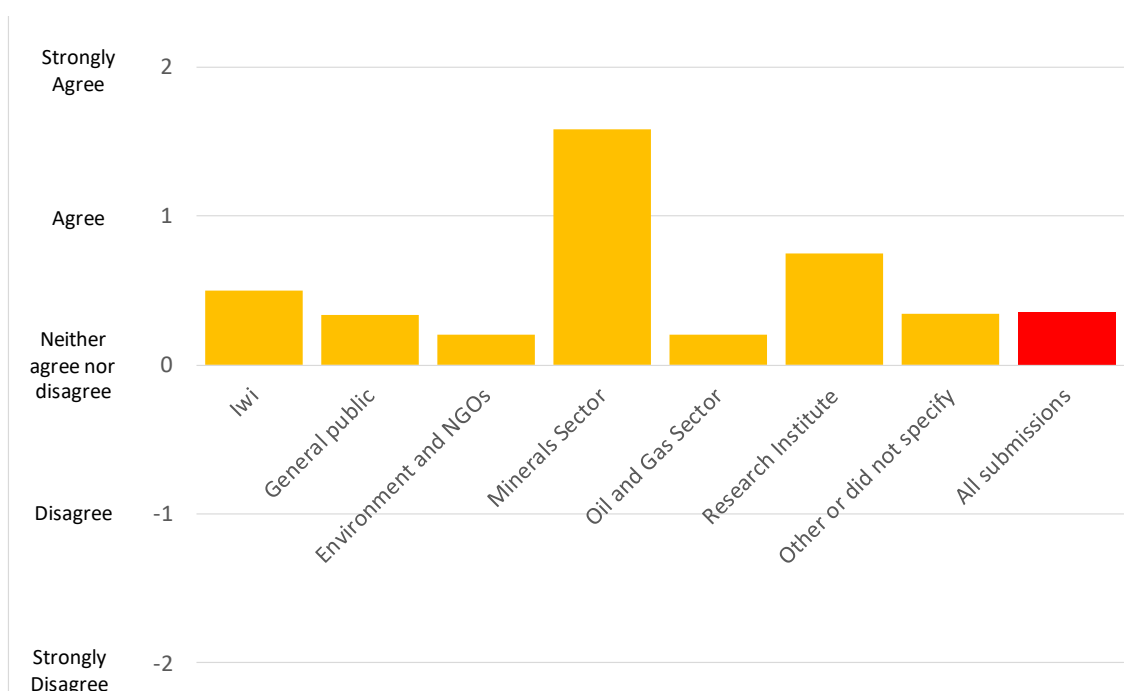


Figure 26: Do you agree with this Principle: The Crown receives a fair financial return for its minerals and petroleum? Positions by submitter group

113. Comments across many submissions included concerns that there was no amount of financial compensation that would be fair, because of the negative effects associated with the use of petroleum and minerals (although there was likely some conflation between fossil fuels and other minerals, based upon submissions). There was also concern that the financial return would create undesirable incentives for their continued use.
114. Those that agreed with this principle supported the idea of returns being used for the benefit of all New Zealanders, in particular, not being left with operators. Venture Taranaki Trust, for example, suggested that “the communities from which minerals and petroleum resources have been and continue to be extracted should also receive a fair financial return from Crown”.²³ Others believed that this return could be used to help transition away from fossil fuels and towards renewables.
115. Those who strongly opposed argued that profit is taking precedence over the environment. Many argued the Crown should not receive any return, as these resources must be “left in the ground”. Some other submitters felt the royalties rates are far too low compared to other jurisdictions.

Question 23: *Principle: The Crown regulates in a way that is fair, transparent, reasonable and proportionate.*

116. This principle was widely supported across all submitter groups (see figure 27), with 91 per cent of submitters strongly agreeing, but generally attracted less written comments than other principles.

²³ Submitter 383

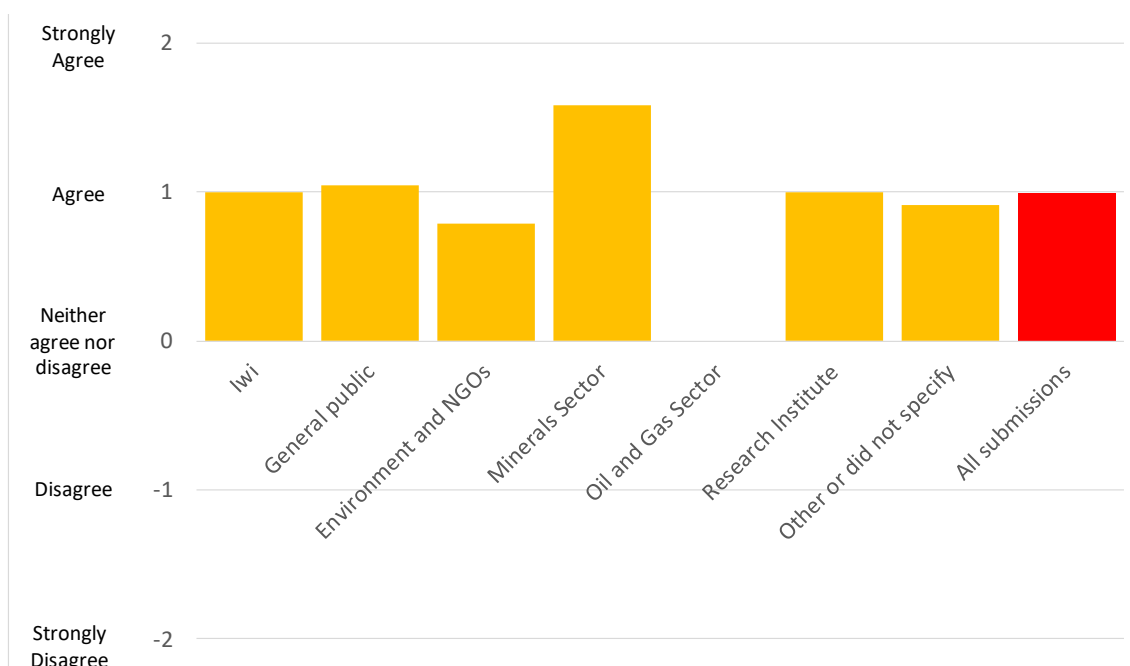


Figure 27: Do you agree with this Principle: The Crown regulates in a way that is fair, transparent, reasonable and proportionate.

117. Those in agreement with this principle emphasised sustainability, the negative impact mining had on the environment, and responsibility on behalf of the Crown to ensure these. Many comments clearly stated that this is “the right thing to do”. Paekakariki Community Trust acknowledged that this may be difficult “as a dramatic change in dependency on fossil fuels will result in losses to some industries”.²⁴
118. Submitters that opposed the principles wanted to see a stronger stance taken on environmental aspects. In particular, comments centred on minimising resource extraction and creating stricter conditions for operators. One comment argued the wording of the principle makes it “not a statement which can be enforced”.²⁵ This submitter, among a small number of others, wanted to have more accountability and transparency by the Government.

Question 24: *Do you agree with the principle: The Crown honours the rights of current permit holders to continue production or exploration activities under existing permits?*

119. As figure 28 depicts, this principle had the strongest opposition out of any principle with approximately 70 per cent either disagreeing or strongly disagreeing. Individuals and groups whom classified themselves as ‘Iwi’, ‘Environment’ and ‘NGOs’ disagreed the most with this principle. Primarily, submitters were concerned regarding climate change implications, sustainability and the net-zero carbon by 2050 target. Greenpeace stated that this principle “should be removed as it is in conflict with the latest scientific evidence”.

²⁴ Submitter 405

²⁵ Submitter 236

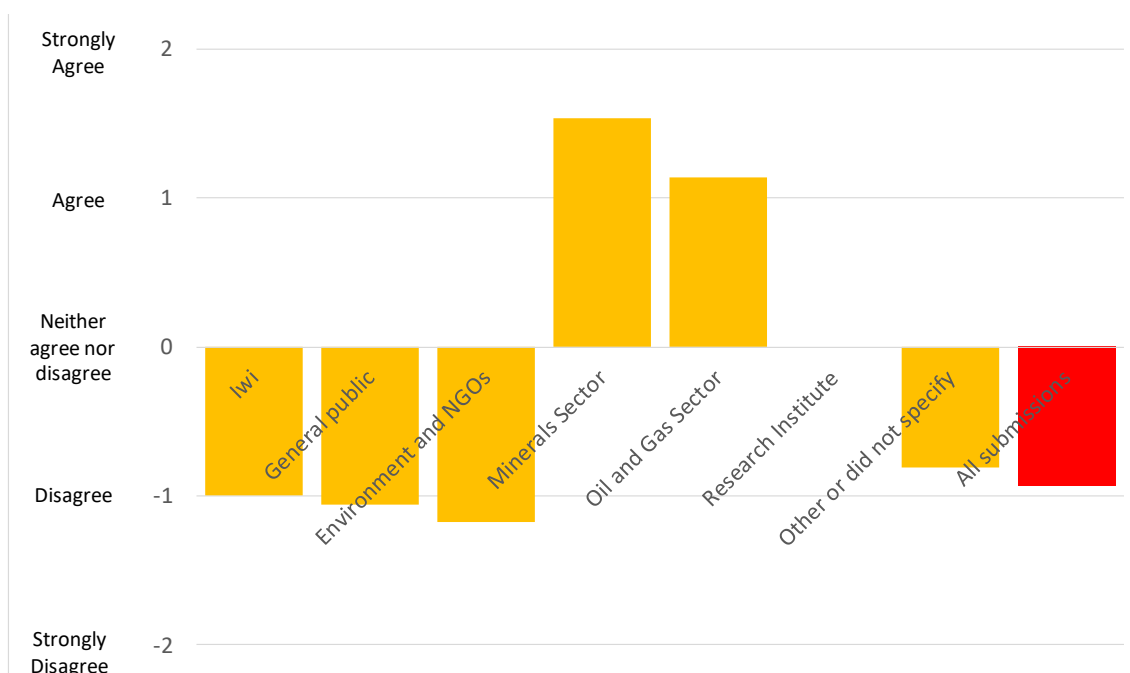


Figure 28: Do you agree with this Principle: The Crown honours the rights of current permit holders to continue production or exploration activities under existing permits?

120. A range of views were expressed regarding what to do with current permits ranging from those who suggested that permits should be reviewed in line with climate change (particularly the Net Zero Carbon Bill); those that suggested renegotiating and phasing down fossil fuel production; through to those that demanded that permits be revoked immediately, with no compensation. Some also submitted that the petroleum companies should be paying compensation for the effects of their products. Overall, these submissions reflected a desire to end petroleum exploration and production as swiftly as possible.
121. Industry participants were most supportive of this principle, with emphasis on the Crown honouring contracts and the significant investments made by current permit holders into their projects. A small number of submitters, such as OMV New Zealand, wanted to “see subsequent, and all other, rights afforded to existing permit holders under the current CMA provided for...”

Question 25: *Do you agree with this principle: The Crown makes policy decisions based on the best evidence, and accounting for the foreseeable need for minerals and petroleum, both now and for future generations?*

122. 51 per cent of submitters strongly agreed or agreed with this principle. As shown in figure 29, submitters from the oil and gas sector and environment and NGOs were least supportive of this principle. There was support for the Government acknowledging climate change evidence and using this to inform policy decisions to phase out fossil fuels, reduce carbon emissions and sustainably manage the natural environment. A number of industry submitters also expressed support, such as PEPANZ who stated that they “support robust policy development processes and

impact analysis so that the benefits and costs of potential decisions can be understood before those decisions are made”.

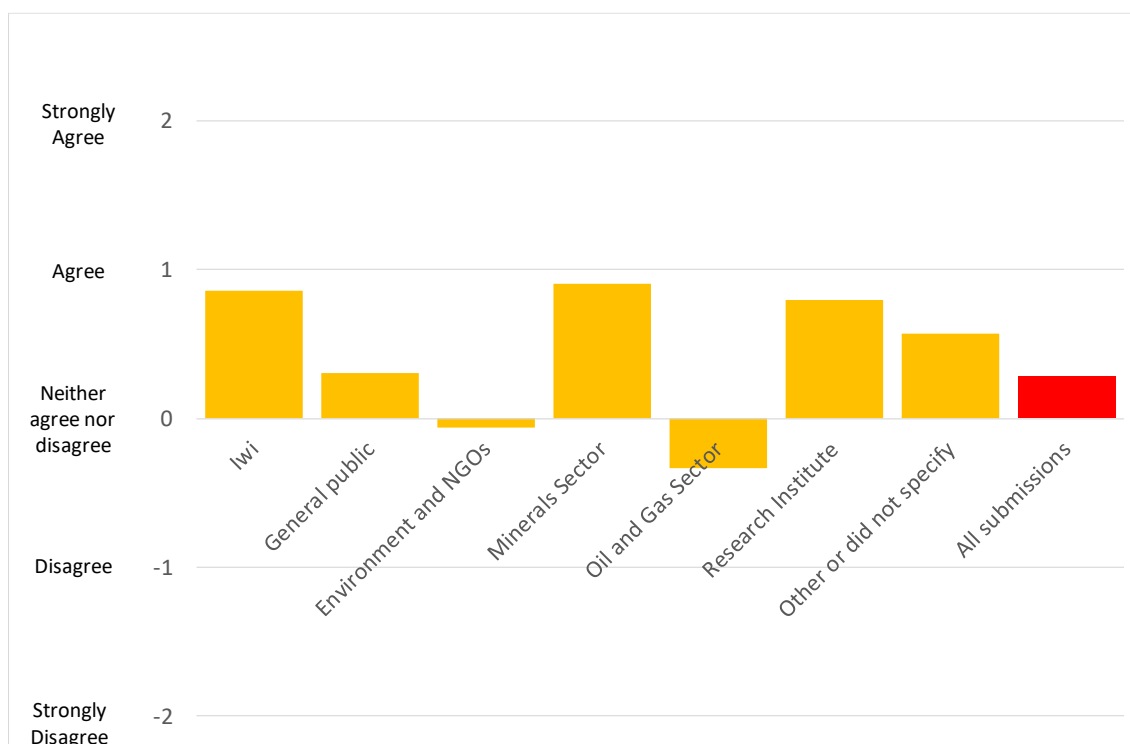


Figure 29: Do you agree with this principle: The Crown makes policy decisions based on the best evidence, and accounting for the foreseeable need for minerals and petroleum, both now and for future generations?

123. 32 per cent of submitters did not support this principle, which is primarily attributable to their view that the Crown does not currently take action based on best evidence. Some referenced the continuation of extractive industries, with one comment stating this “is proof that the Crown is not making good policy decisions for current and future generations”.²⁶

Question 26: *Do you support the principle: The Crown proactively engages and consults with relevant stakeholders and decisions are communicated in a clear and transparent way?*

124. This principle was widely supported with 73 per cent of submitters expressing support, see figure 30 below. Those in agreement emphasised the importance of the Crown clearly and transparently communicating and engaging meaningfully with communities. Through this, submitters wanted to see social and environmental concerns placed above economic considerations.

²⁶ Submitter 32

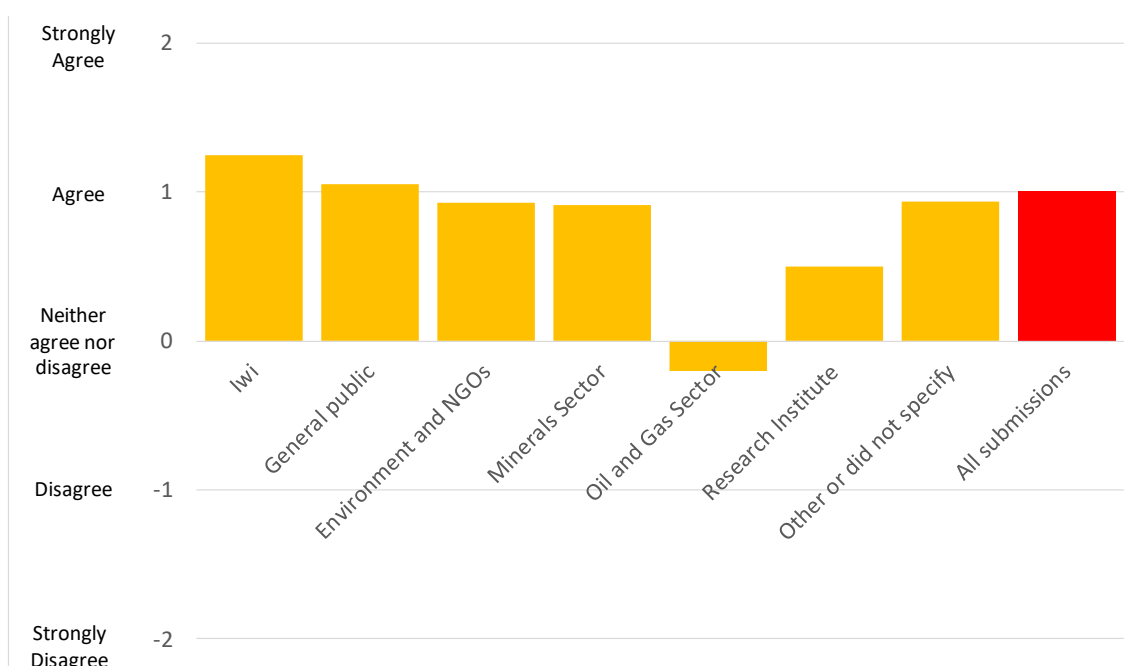


Figure 30: Do you agree with this principle: The Crown proactively engages and consults with relevant stakeholders and decisions are communicated in a clear and transparent way?

125. Those that disagreed generally criticised past engagement efforts with the public. One submitter expressed the view that “The Crown leaves the NZ people out as the most important stakeholder”.²⁷
126. Submitters that both agreed and disagreed with this principle made comments around the lack of engagement, communication or transparency by the Crown in the past, or industry stakeholders having too large an influence on Crown decisions.

Principles to guide industry

Do you agree or disagree with each of the following principles for Industry?

127. In questions 27 through to 31, MBIE sought submitter’s views on each of the principles to guide industry in the Strategy and whether there were any other principles submitters would like considered in the Strategy. Levels of support for industry-focused principles are presented in figure 31.

²⁷ Submitter 45

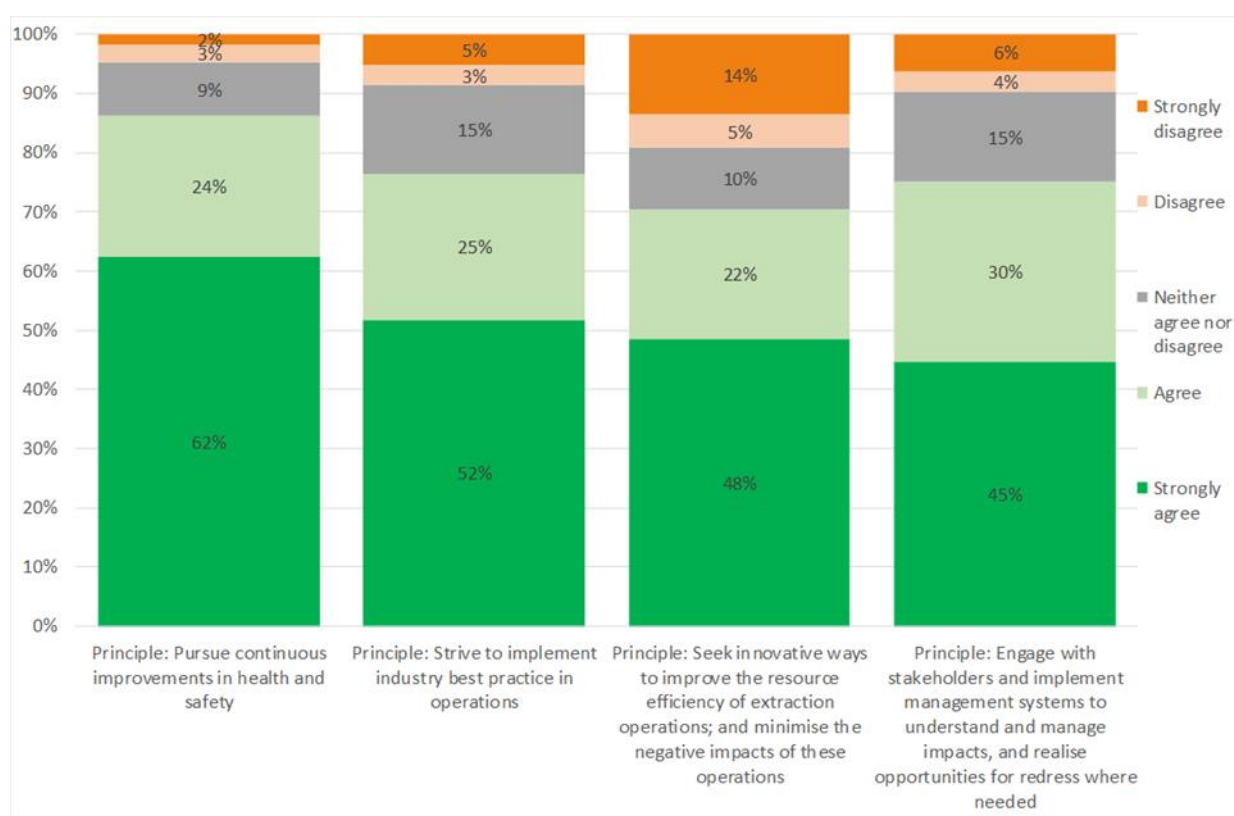


Figure 31: Overall submitter response for each of the principles to guide industry

Question 27: *Do you agree with the principle: Pursue continuous improvements in health and safety?*

128. As figure 32 presents, this principle was widely supported with 86 per cent of submitters strongly agreeing or agreeing. Many submitters stated this is a given in any industry, and it should be a priority. Other supporting comments noted the importance of protecting the environment and considering the wider health effects of industry activities. A number of industry participants agreed with this principle on the condition that it does not stifle “development and experimentation”.

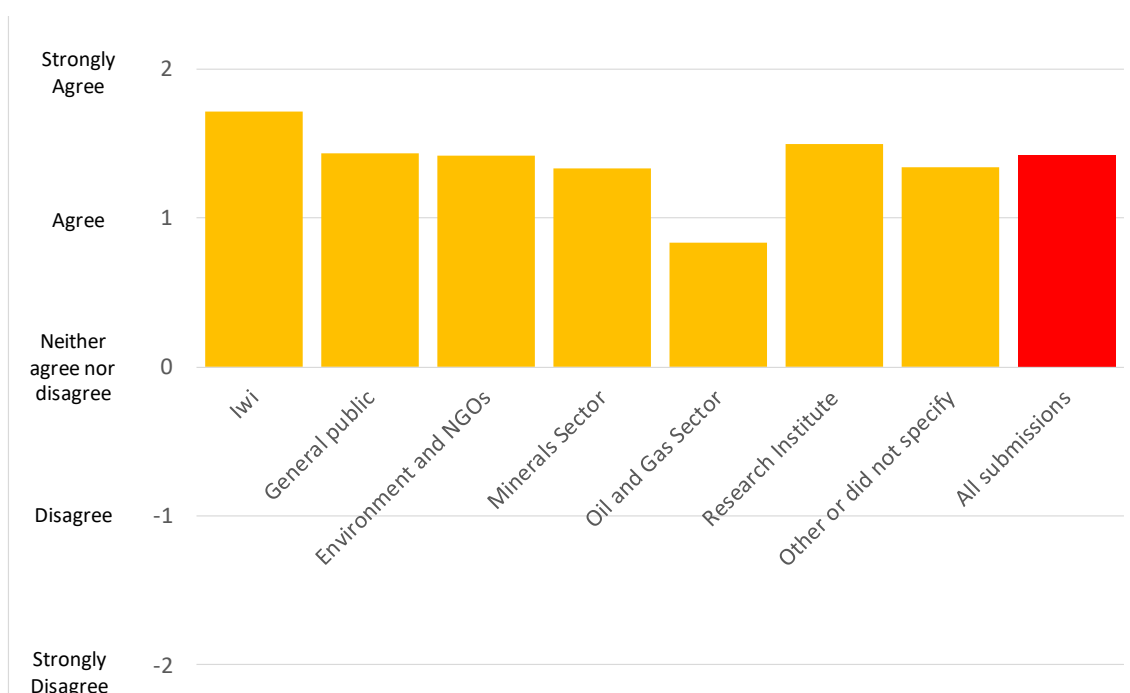


Figure 32: Do you agree with this principle: Pursue continuous improvements in health and safety?

129. There were a range of views from those who did not agree with this principle. Some argued that the focus on health and safety takes away from what should be the focus of phasing out these industries, with some wanting to “see the end of all minerals and petroleum immediately”.²⁸ Other submitters who opposed, primarily representing industry groups, cited over-regulation for health and safety which is “costing the country productivity”.²⁹

Question 28: *Do you agree with the principle: Strive to implement industry best practice in operations?*

130. This principle was widely supported across all submitter groups (see figure 33) with 77 per cent of submitters strongly agreeing or agreeing. General comments were made in regards to phasing out the extractive industries altogether. For example, the Coal Action Network Aotearoa commented that “best practise is not an adequate substitute for phase out”.³⁰ Some other supporting comments referenced New Zealand in relation to the global oil and gas industries, wanting to ensure New Zealand is a global leader in best practice.

²⁸ Submitter 87

²⁹ Submitter 124

³⁰ Submitter 480

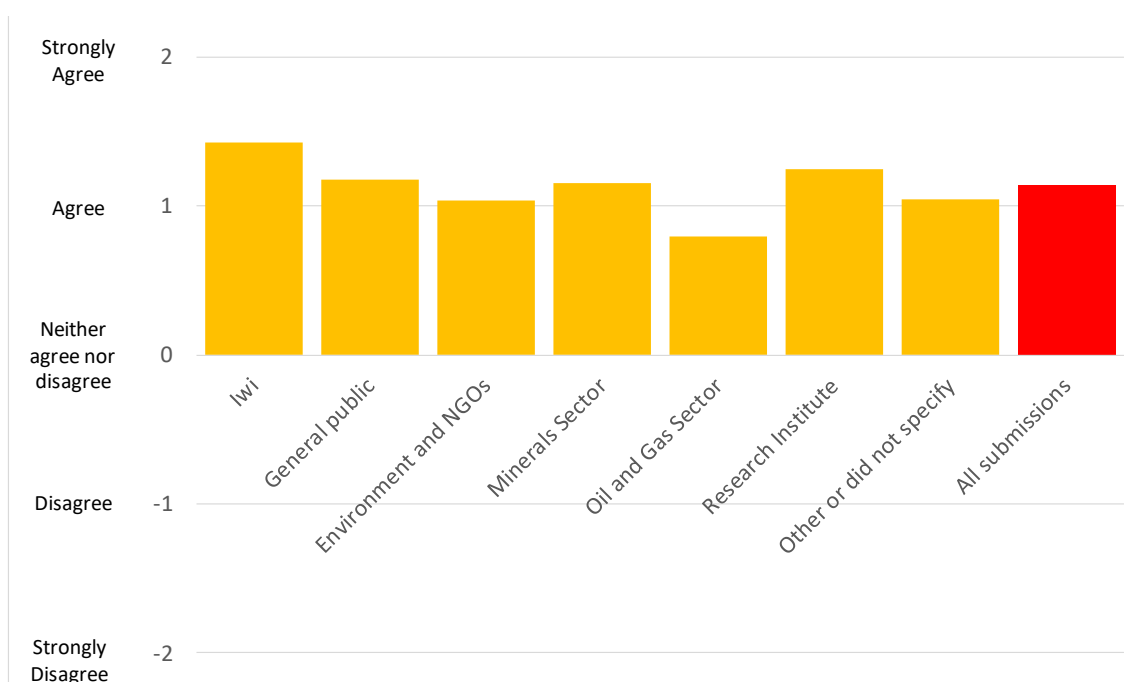


Figure 33: Do you agree with this principle: Strive to implement industry best practice in operations?

131. Those who disagreed with this principle generally commented on the need to focus on reducing sector activities and phasing out the industry. The Environment and Conservation Organisations of NZ Inc for example, commented that it is “Far better to implement high performance standards rather than accept that what is done best now is sufficient”.³¹ Some identified that ‘best practice’ could help the industry transition justly away from extractives.
132. Others who opposed argued that this principle should be industry-driven. The Australasian Institute of Mining and Metallurgy stated that “Those who understand best practice the most are, or generally were, employed as part of the minerals industry”.³²

Question 29: *Do you agree with the principle: Seek innovative ways to improve the resource efficiency of extraction operations; and minimise the negative impacts of these operations?*

133. This principle was supported by 70 per cent of submitters, see figure 34 below.

³¹ Submitter 545

³² Submitter 485

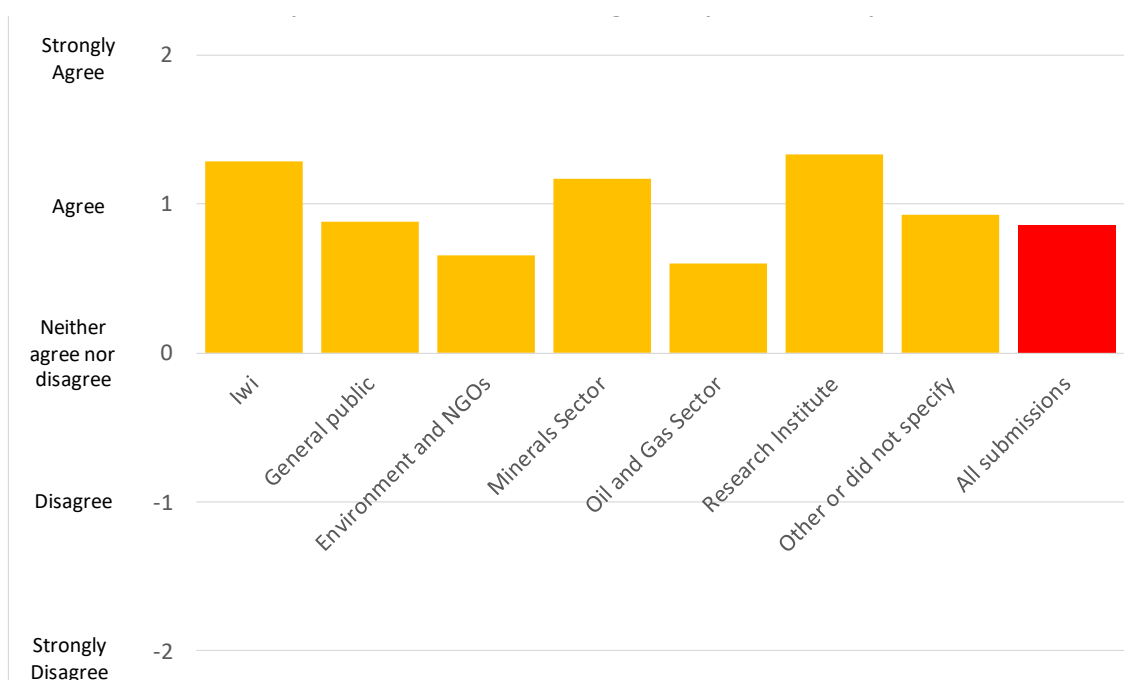


Figure 34: Do you agree with the principle: Seek innovative ways to improve the resource efficiency of extraction operations; and minimise the negative impacts of these operations?

134. Those that agreed primarily commented that this principle must be met in a way that supports the phasing out and transitioning away from fossil fuels and extractives. Mental Health Research & Development Ltd, as one example, agreed with this principle “only in the case of essential minerals needed for the move to a carbon neutral economy”.³³ A number of comments centred on environmental impacts being prioritised above efficiency. In one submitter’s words, “profit should not be the guiding element”.³⁴
135. 20 per cent of submitters disagreed or strongly disagreed with this principle. This was generally on the basis of their desire to phase out fossil fuels or ending extraction operations. Many emphasised the negative impacts of the industry, particularly on the environment. One comment argued that “Negative impacts should be eliminated not just minimised”.³⁵

Question 30: *Do you agree with the principle: Engage with stakeholders and implement management systems to understand and manage impacts, and realise opportunities for redress where needed?*

136. This principle generated support from 78 per cent of submitters, across all submitter groups (see figure 35). Those that agreed discussed the need for redress, not just realising opportunities to do this, but creating them. Others emphasised the need for industry to monitor and manage the environmental and social impacts of their operations. Some comments argued for stricter regulations to incentivise this action from industry.

³³ Submitter 478

³⁴ Submitter 322

³⁵ Submitter 406

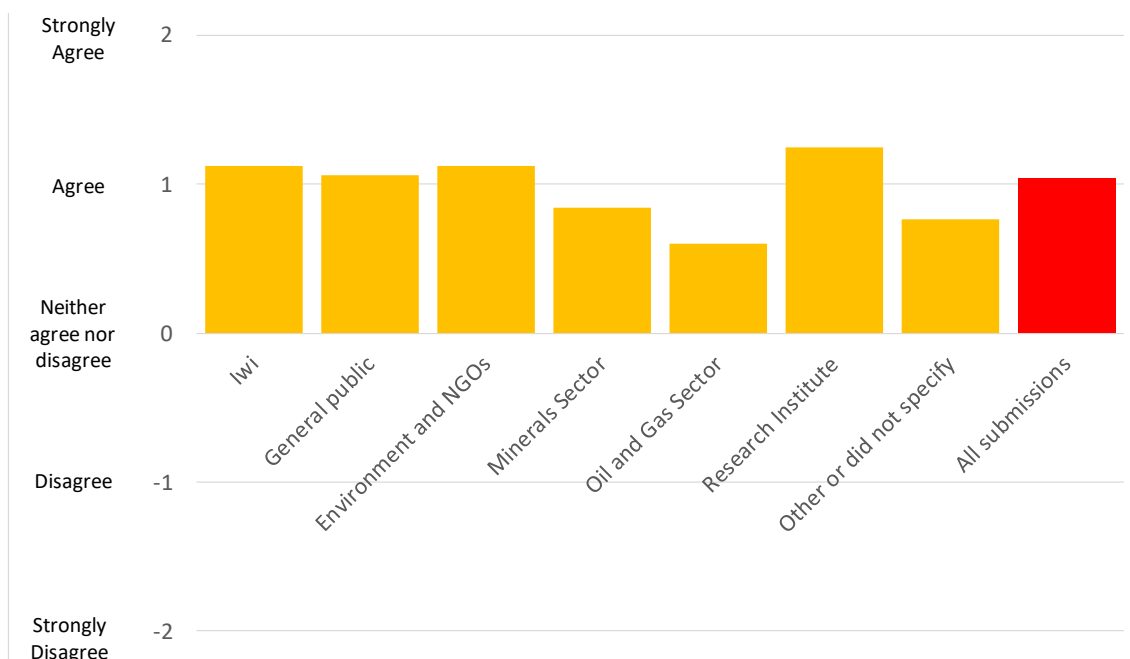


Figure 35: Do you agree with the principle: Engage with stakeholders and implement management systems to understand and manage impacts, and realise opportunities for redress where needed?

137. Some industry participants acknowledged the need to develop effective relationships with stakeholders in order to build a ‘social licence’ to operate. These submitters often highlighted the importance of stakeholders reciprocating this relationship. AusIMM New Zealand for example, noted that “this requires stakeholders to engage in a balanced manner”.³⁶
138. A number of submitters who opposed this principle argued that by the time redress is needed, it will be too late. Many referred to the severity of the impacts of sector activities, and how these will be beyond ‘management.’
139. Some industry submitters who disagreed with this principle noted that the term “redress” implies wrongdoing by the industry, and could be replaced by “avoiding, remedying or mitigating”.³⁷

Question 31: Are there any other principles you would like us to consider in the strategy?

140. As reflected in comments made on the principles, there was the prevalence of placing the climate as the priority. The comments made discussed principles of sustainability, reducing consumption of resources, repairing the natural environment and developing alternative, renewable energy sources. Many comments called for carbon neutrality and reducing our reliance on fossil fuels.
141. A number of submissions also emphasised the importance of industry accountability for the impacts of extractive operations. The Green Party of New Zealand went beyond this to say that “Moral responsibility is necessary for all parties”.³⁸

³⁶ Submitter 544

³⁷ Submitter 514

142. A number of industry groups wanted to see the resource needs of oil and gas reflected in the principles. For example, OMV New Zealand believed one principle should “Recognise that local petroleum and mineral resources will continue to be fundamental to our living standards to reduce import dependency”.³⁹ PEPANZ echoed a similar message saying that “Oil and natural gas have a long-term role in the global energy mix as well as through their petrochemical uses”.⁴⁰

Action Areas

Do you agree or disagree with each of the following Action Areas for the Government?

143. Questions 32 through to 38 sought submitters’ views on each of the action areas outlined in the Strategy, what actions submitters would like the Government to consider undertaking and whether there are other action areas the Government should focus on. A snapshot of the support expressed for each action area is presented below in figure 36.

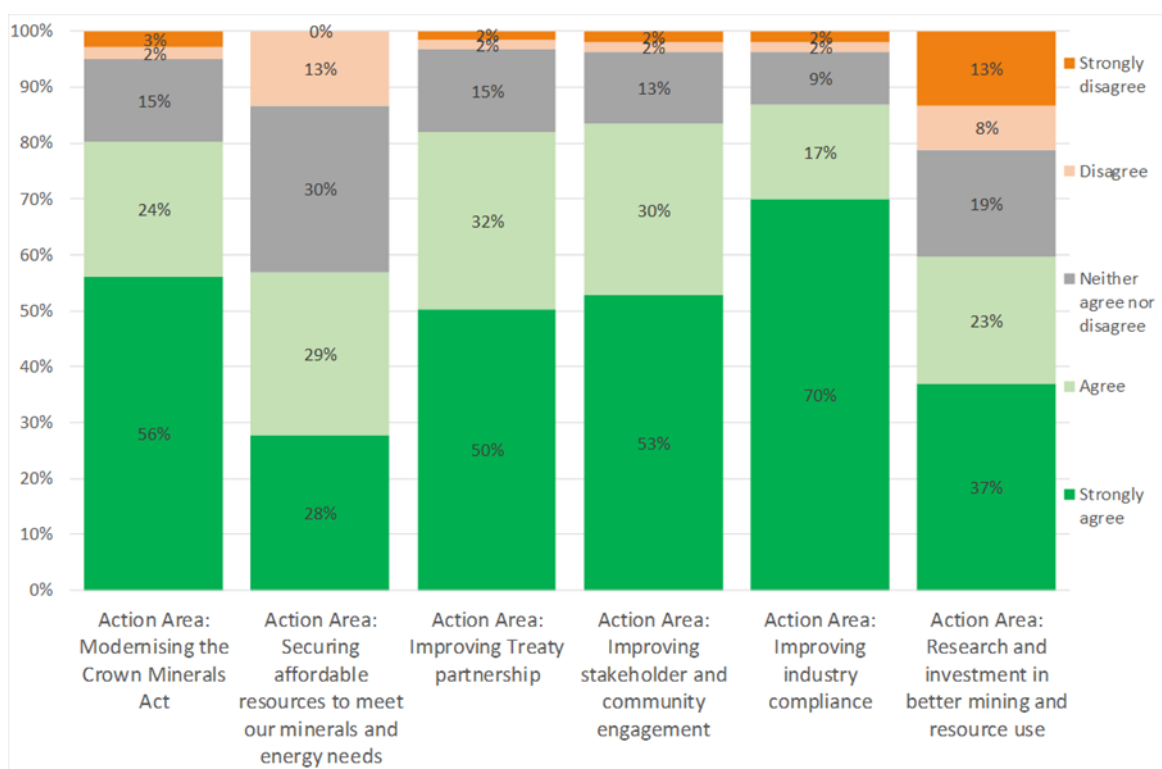


Figure 36: Overall submitter response for each of the principles to Action Areas

Action Area One: Modernising the Crown Minerals Act 1991

Question 32: Do you agree with the Action Area *Modernising the Crown Minerals Act*?

144. This action area was strongly supported by submitters with over half (58 per cent) strongly agreeing, and 23 per cent agreeing with the need to review the CMA shown in figure 37 below, iwi representatives, members of the public, and environmental

³⁸ Submitter 166

³⁹ Submitter 512

⁴⁰ Submitter 538

groups particularly supported this. Industry participants, presumably more supportive of the current legislation as is, expressed less support.

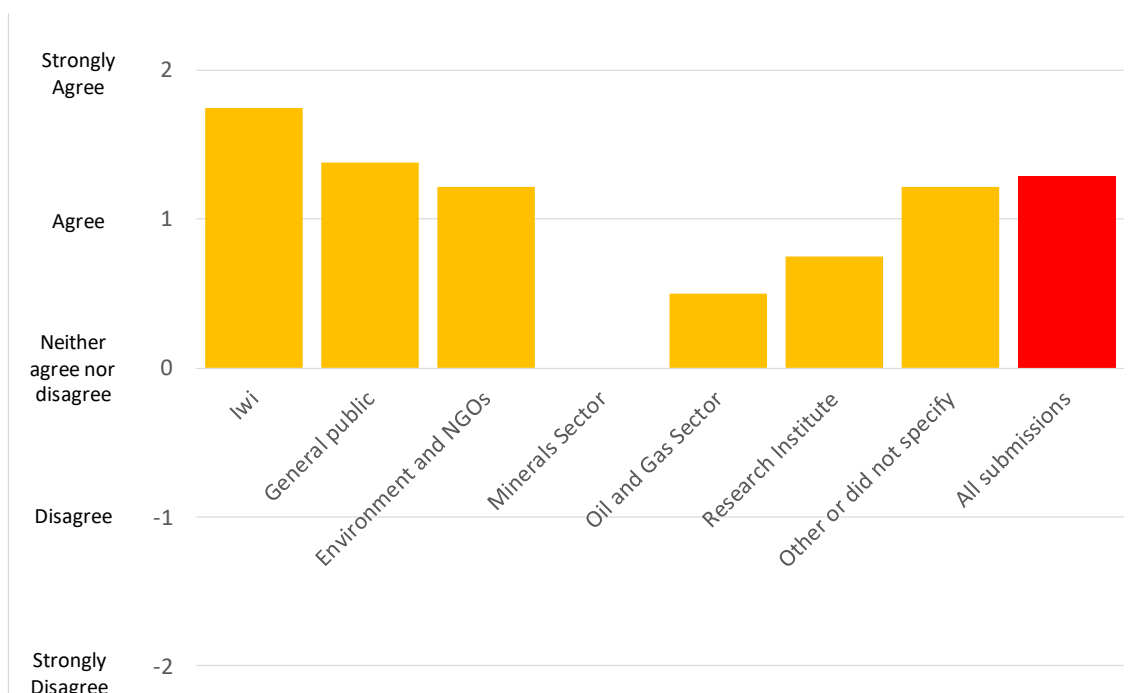


Figure 37: Do you agree with the Action Area: Modernising the Crown Minerals Act?

145. Those who agreed emphasised the need for the Act to keep pace with climate change awareness and research. In particular, submitters noted their desire for the Act to consider environmental impacts and contribute to reducing fossil fuels. A number of submissions also referenced a ‘climate crisis.’ The Northland Urban Rural Mission wants to see “a full first principles review of the Act and associated policies”.
146. Submitters that disagreed with this action area predominantly came from individual industry participants, arguing the current legislation is sufficient. Other individuals from the public opposed a review of the Act on the grounds that mining should cease altogether. There were also a number of references to the No New Mines on Conservation Land policy, and the desire to abandon it.

What future actions would you like us to consider under this Action Area?

147. A majority of submitters focused future actions around ensuring the Act supports environmental sustainability, ending extractives, reducing use of fossil fuels and creating a circular economy.
148. There were number of comments suggesting the separation of petroleum and minerals, largely in order to help phase out fossil fuels. For example, one submitter stated petroleum and mineral extraction should be separated “so that fossil fuels can

be rapidly phased out while sustainability and safety of minerals extraction can be improved”.⁴¹

149. Other comments noted the importance of ensuring a consistent regulatory regime. For example, Todd Corporation Ltd suggested that the “Resource Strategy consider opportunities to modernise other regulatory instruments, to promote efficiency and support technological innovation”.

Action Area Two: Securing affordable resources to meet our minerals and energy needs

Question 33: Do you agree with the Action Area: Securing affordable resources to meet our minerals and energy needs?

150. This action area generated support from 57 per cent of submitters. As demonstrated below in figure 38, industry groups were the most supportive of this action area. Submitters that agreed with the entire action area recognised the need of resources to meet energy demands, and/or help transition to a lower emissions economy. A number of responses highlighted the desire for these resources to be renewable and sustainable. PEPANZ noted the need for Government policies and commitments to better align with this action area.

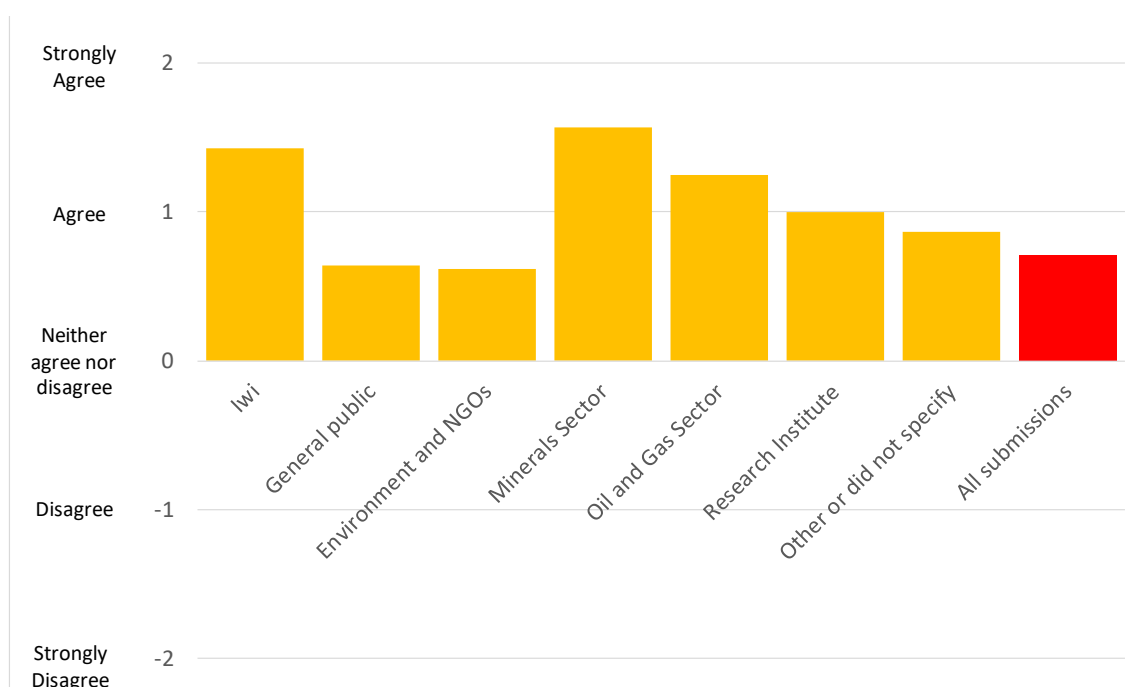


Figure 38: Do you agree with the: Securing affordable resources to meet our minerals and energy needs? Positions by submitter group

151. Although most opposing submitters acknowledged the need for affordable resources, they disagreed with the notion of deriving these resources from mining activities. A

⁴¹ Submitter 73

large proportion of these responses also pointed to the potential for renewables in helping secure sustainable resources to help phase out fossil fuels.

What future actions would you like us to consider under this Action Area?

152. There was a large focus on developing clean, renewable energy sources in this action area. Many submitters also highlighted the need to take steps towards a circular economy by phasing out fossil fuels.
153. Greenpeace, for example, wanted this action area to specifically address the need to rapidly phase out fossil fuel extraction. This included, establishing which current uses of fossil fuels can easily be replaced, which areas require research and development spending to find alternatives, and which uses should be prioritised due to a lack of readily-available alternatives in the short term.
154. There were a number of suggestions around conducting more research into New Zealand's mineral deposits, and into alternative energy technologies and infrastructure. Straterra, for example, agreed with the "need to develop a better understanding of our stock of resources – while noting technologies, supply and demand and commodity prices change in real time".
155. GNS Science submitted a number of specific actions aimed predominantly at better understanding New Zealand's mineral and petroleum resources and enabling better access to, and public provision of, relevant data and geoscience information. This included undertaking "New mineral potential studies for other critical minerals that may be present in New Zealand" and "greater collaboration, sharing and dissemination of geoscience and resources data and information between GNS Science and MBIE".

Action Area Three: Improving Treaty partnership

Question 34: *Do you agree with the Action Area: improving Treaty partnership?*

156. This was the most strongly supported action area with 82 per cent of respondents either agreeing or strongly agreeing. Figure 39 demonstrates the spread of support by submitter group. Supporters made a range of comments in regards to upholding the Crown's obligations to the Treaty of Waitangi, utilising Māori knowledge and experience, or empowering Māori to play a greater role in the decision-making. There were a number of comments made which mentioned poor past engagements, with many future actions emphasising the need for more quality engagement with Māori.

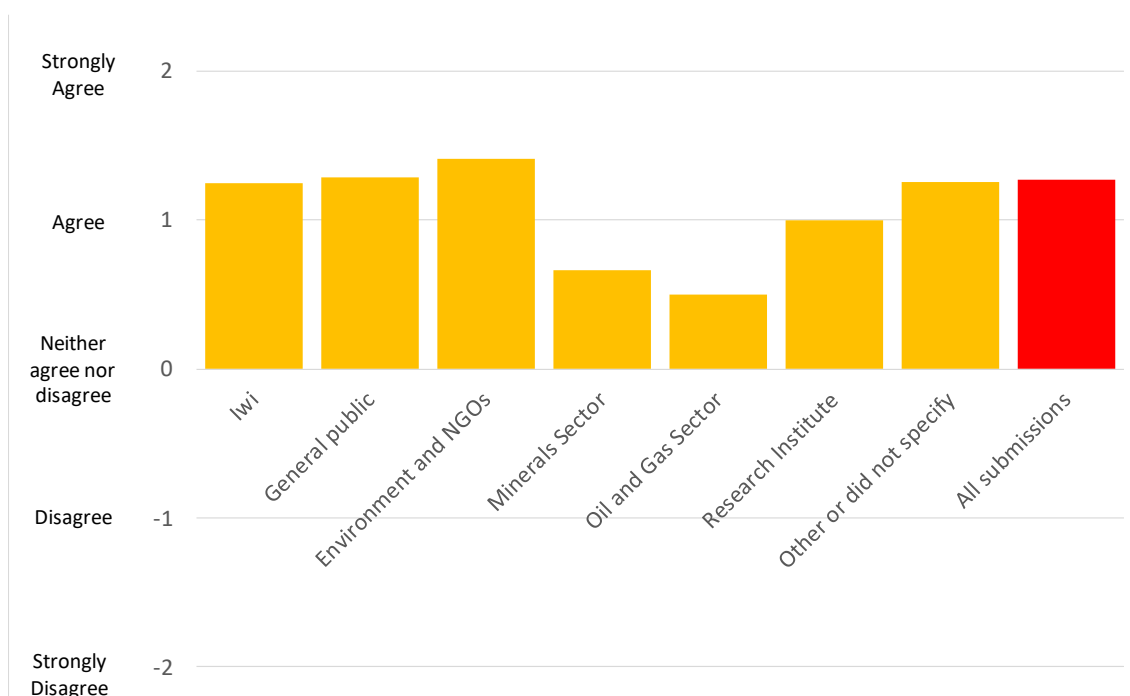


Figure 39: Do you agree with the Action Area: improving Treaty partnership? Positions by submitter group

157. The submissions that disagreed with improving the Treaty partnership did so on the basis that the Treaty partnership should not be ‘improved,’ but rather given effect to. Similarly, other disagreement stemmed from the view that the Strategy minimises or reduces Te Tiriti, appearing as ‘tokenistic’ or ‘reductionist’.
158. A small number of submissions disagreed with this action area as they do not see a place for the Treaty partnership in the petroleum and minerals sectors.

What future actions would you like us to consider under this Action Area?

159. A key theme among future actions for improving the Treaty partnership centred around empowering Māori. Suggestions were made regarding giving more, equal, or all, governance and decision-making powers to Māori. At a minimum, there were a number of references to “supporting Māori” and having “much more Māori representation,” while others argued iwi and hapū should have “rangitiratanga and sovereignty over their resources”. A number of future actions also highlighted utilising traditional Māori knowledge.
160. Many submitters emphasised the need to fully embrace the Treaty partnership by having more genuine engagement with Māori groups. This included, “open communication”, “Māori involvement at all levels of decision-making” and “actively working with Māori”.
161. Māori groups often presented a balanced perspective in regards to petroleum and minerals, in so far as the activities of the sector are not at the detriment of the environment. Te Korowai o Ngāruahine Trust, for example, stated that “Māori are not anti-development or anti progress, but we do offer a lens that is more precautionary in

terms of the life-giving capacity of the eco-system and our approach to the extraction on mineral resources is founded on principles of respect and reciprocity towards the environment”.

Action Area Four: Improving stakeholder and community engagement

Question 35: *Do you agree with the Action Area: Improving stakeholder and community engagement?*

162. This action area was also widely supported with 83 per cent of submitters supporting the intention to improve stakeholder and community engagement. Many submissions pointed to the social, environmental and economic impacts of mining that affect communities as justifying the need for engagement. Some submitters criticised past engagement efforts emphasising the need for more quality collaboration with communities.

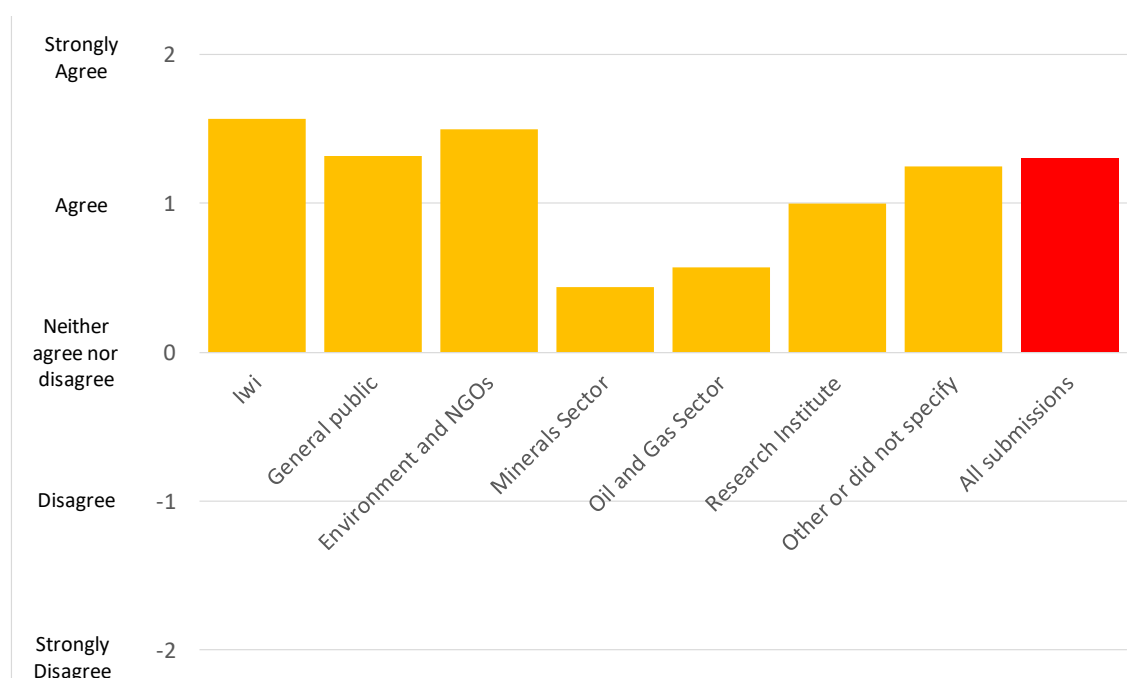


Figure 40: Do you agree with the Action Area: Improving stakeholder and community engagement? Positions by submitter group

163. Industry submitters were least supportive of this action area, as shown in figure 40. Those who disagreed with this action area did so largely on the basis that they believe current engagements are adequate. Others disagreed based on the perception that public engagement has little impact on sector decisions and outcomes.
164. A number of submissions emphasised the need for education through community engagement. Straterra, among many other industry participants, held the view that “Government has a role in informing the public of the importance and contribution of minerals and resources including for the low carbon economy”.

What future actions would you like us to consider under this Action Area?

165. A number of recommendations in this action area focused on local development, including sharing benefits with communities, developing necessary infrastructure to help the transition away from fossil fuels, and being transparent about the activities in the sector.
166. There were numerous arguments in favour of involving communities and conducting more public consultations within the sectors particularly on “permits likely to affect land and resources around them”. Within this, there was common agreement on the need for more face-to-face consultations with the public.
167. A number of submitters, particularly industry participants, emphasised the need to bring greater education and awareness to the public of resource needs and the benefits of the petroleum and minerals sectors, for both current needs and for a transition to a low emissions economy.

Action Area Five: Improving industry compliance

Question 36: *Do you agree with the Action Area: Improving industry compliance?*

168. A majority of submitters (87 per cent) supported improving industry compliance. As Figure 41 shows, this support was particularly strong among environmental groups, NGOs, and individual public submissions. Much of this support stemmed from the views that the industry must reduce the environmental impacts from sector activities and act in a way that is consistent with reducing our reliance on fossil fuels. A number of submissions argued that the industry has acted with poor compliance in the past and stricter enforcement must occur.

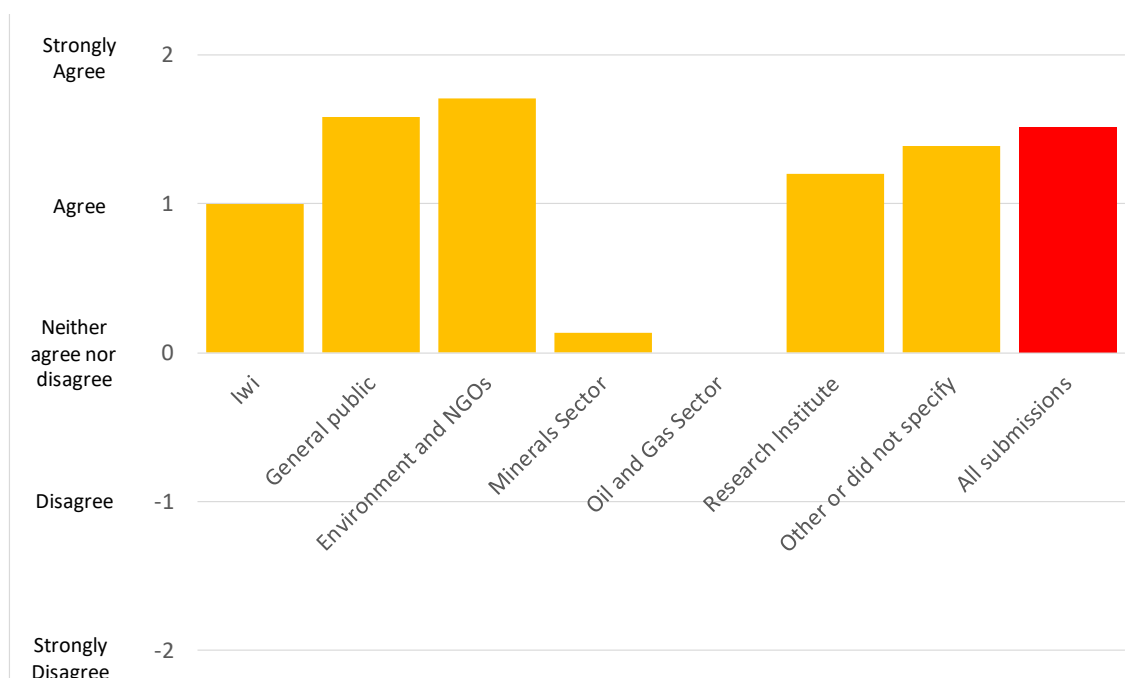


Figure 41: Do you agree with the Action Area: Improving industry compliance? Positions by submitter group

169. Submissions opposing this action area did so largely on the basis that the industry should be phased out. On that basis there would be no need for improved compliance. Accordingly, a significant number of submissions recommended future action to include phasing out industry altogether, if not having stricter enforcement of non-compliance.
170. A small number of submissions which opposed this action area, primarily from industry participants, stated that the industry already has strong compliance, or that the current legislation is adequate.
171. Todd Corporation Limited's considered that few, if any, sectors in New Zealand are as heavily regulated as the petroleum sector. Further, Todd considers that petroleum companies generally (and Todd especially) have thorough processes to ensure compliance occurs at a very high level.

What future actions would you like us to consider under this Action Area?

172. Future actions focused on improving industry transparency primarily through stricter enforcement. Suggestions ranged from "more inspections and inspectors" through to "strong monitoring by independent watchdogs". There were a number of statements in favour of tighter regulations with more significant penalties for non-compliance.
173. Some submitters argued that industry groups should have higher levels of accountability. These comments particularly centred on industry players holding more responsibility for environmental impacts and the regeneration of the land. Forest and Bird would like the Government to investigate funding future clean ups of legacy mining sites through an industry levy.

Action Area Six: Research and investment in better mining and resource use

Question 37: *Do you agree with the Action Area: Research and investment in better mining and resource use?*

174. Half of submitters supported this action area. However, it is important to note that, among submitters that both agreed and disagreed, nearly all held the common view of research and investing in alternative resources, namely renewables, to contribute to a circular economy. As shown in figure 42, this action area was strongly supported by research institutes.

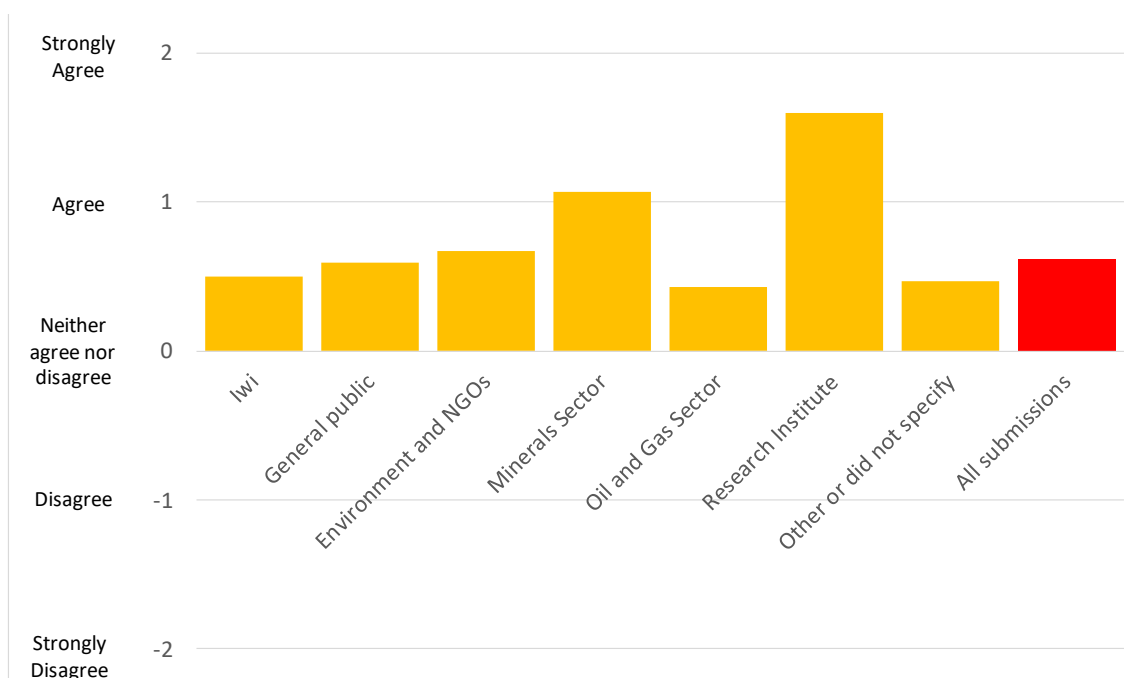


Figure 43: Do you agree with the Action Area: Research and investment in better mining and resource use? Positions by submitter group

175. There were two main streams of thought for those who supported this action area. A significant number of submitters (Māori, environmental groups, industry and the general public) supported this area in order to develop the means to help transition to a low emissions economy. AusIMM New Zealand stated that “research and development in this space is critical for a successful transition to a zero-carbon economy as new resources are required to achieve this aspiration”.
176. Other submitters, primarily members of the public, who agreed with this action area did so on the grounds that better mining and resource use may lead to improved social and environmental outcomes.
177. Nineteen per cent of submitters neither agreed nor disagreed with this action area. A majority of these comments argued that investment should be made into ending extractives and phasing out fossil fuels. A majority of the 21 per cent that opposed this action area also held this view. Greenpeace stated: “It goes without saying that no Government resources should be put into oil, gas and coal exploration, mining or promotion. The Strategy should acknowledge this”.

What future actions would you like us to consider under this Action Area?

178. Future actions centred around the desire to end extractives, phase out fossil fuels, and move towards a more sustainable, circular economy. A number of submitters stated that future investment should go into “transitioning to an environmentally and socially sustainable economy”.
179. Other submissions raised the idea of sharing research and information with the public to both be transparent with the current activities of the sector and to educate people

on the future challenges and opportunities in the sectors. AusIMM New Zealand, who shared a common view with a number of industry participants, supported “greater funding for/ of Tertiary level and industry research”.

180. Straterra suggested that “research into potential alternative green future uses of coal” could be included as an action under this action area.

Question 38: *Are there any other Action Areas you would like us to consider as part of advancing this Strategy?*

181. There was strong support for recycling and the circular economy across all submission groups including iwi, environmental, industry and individual members of the public. Many of the environmental groups wanted the Strategy to place more emphasis on creating a circular economy (rather than extracting new resources to meet our needs). Many industry groups noted that Government has a significant role to play in incentivising the shift to a circular economy and wanted to see more action in that respect. For example, the Aggregate and Quarrying Association, suggested that a cost/benefit analysis for recycling and re-use of construction waste needs to be conducted by Government, in consultation with industry.
182. There was also significant support for stronger actions towards transitioning to a low emissions economy. This included protecting communities, industry members and the environment. Greenpeace commented that there should be actions to “develop pathways for supporting workers in the fossil fuel industry and affected communities with employment and development opportunities in sustainable industries”. Coromandel Watchdog of Hauraki encouraged the government to “be brave enough to act for a genuine Just Transition by 2030”.
183. Similarly, a significant number of submissions expressed the desire to phase out fossil fuels. Suggestions made included “setting measurable targets to account for progress” to enable a smooth transition to a low emissions economy, while others favoured more drastic measures for reducing emissions.
184. PEPANZ proposed new actions focused on Carbon Capture Storage technology and research. CCS was mentioned a number of times throughout the action area submissions by other industry submitters.

Other matters raised by submitters as part of the consultation

Question 39: *Are there any other comments you would like to make about the “Minerals and Petroleum Strategy for Aotearoa New Zealand: 2019-2029”?*

185. Question 39 gave submitters the opportunity to raise any other comments they on the Strategy.

186. Other comments made on the Strategy largely centred around environmental concerns, including placing the climate as the top priority in the Strategy, ending extractives, phasing out fossil fuels, and moving to a renewables-based, circular economy. Some submitters felt the Strategy does not reflect the Government's commitment to achieving a low emissions economy and wanted more urgency towards phasing out fossil fuels.
187. Submitters from environmental groups made stronger comments highlighting the 'climate crisis' and the desire for the Strategy to have a stronger climate or environmental focus. Many environmentally-focused submitters also emphasised not granting any further consents for oil or gas exploration, and in some cases, revoking all existing permits.
188. Individuals from the petroleum and minerals sectors also recognised the need to move to a low emissions economy, but emphasised the importance of doing so through a just transition. Many comments referred to the lack of consideration in the Strategy of the need for resources or the industry's "requirements for growth and prosperity". One comment stated that the Strategy ultimately aims to "limit the development of New Zealand's resources to the detriment of NZ". For some, the Strategy did not strike the balance between managing our resources efficiently and moving towards a low emissions economy. PEPANZ suggested that the 'energy trilemma' is the best framework for considering energy trade-offs (among sustainability, equity and security) and this should be used in the Strategy.
189. A number of submitters referred to the importance of the Treaty of Waitangi and of incorporating Māori views into the Strategy and in subsequent Government decisions. MineWatch Northland, among other groups, expressed their desire for "the honouring of Te Tiriti o Waitangi in a full way in the context of this strategy". Some submitters reemphasised the importance of engaging fully with Māori on sector decisions and activities.
190. Others do not think the Strategy offers tangible actions to incentivise change in New Zealand. For example, First Gas commented that "the current scope of the Resource Strategy is so broad that it has limited the ability to establish a vision, objectives and actions that can usefully support short, medium and long-term planning". There were a number of concerns expressed about how the Strategy will be implemented in practice or provide sufficient guidance for industry or policymaking. One company highlighted "the need for vigilance across all Government strategy and policy making to ensure that the aspirations of the Strategy can be achieved".
191. Several other themes emerged throughout consultation that were not asked about directly in the online submissions form. These have been set out below.

No New Mines on Conservation Land

192. Several groups from the minerals and petroleum sector raised opposition to the No New Mines on Conservation Land policy being included in the Strategy. New Zealand Coal and Carbon commented "consultation [on New Mines on Conservation Land] has

yet to occur and the outcomes are unknown. It is uncertain what this objective, if pursued, would look like in practice. We feel it would be better to refer to the *consideration of the outcomes of consultation on the No New Mines on Conservation Land objective*".

193. Some submitters went further and raised an issue with the objective of the Policy which is to ensure that mining is done in the right place in the right way. Straterra suggested that the current regulatory regime (such as the CMA and the Resource Management Act 1991) already ensure that mining occurs in the right places and in the right ways.
194. Reefton Gold Limited stated in their submission that "exploration and mining operations should be assessed on a case by case basis. A blanket ruling against mining on DOC land deprives the local communities in which such opportunities that exist for productive gold mines, as well as confirms to the international investment community, is that the geopolitical risk makes NZ as a country not worth investing in the Minerals Sector".
195. New Zealand Coal and Carbon consider that the objective of this policy poses a risk to the Government's desire for "clean-tech" minerals by ruling out large areas where these may occur which could impact the viability of accessing and realising the potential of these.

Timeframe of Strategy

196. Several submitters commented that a 10 year Strategy is too short and does not usefully support infrastructure planning and investment decisions. The Major Gas Users Group stated that "when considering major investment in energy use, members are considering timeframes for investment well in excess of those contemplated by the Strategy". First Gas suggested three time horizons – 10 years, 20 years and 50 years and that this "would increase transparency about expected resource sector challenges over time – energy security for example".

Sequencing of the Strategy and Review of the Crown Minerals Act 1991

197. Several industry groups raised concerns that the Crown Minerals Act 1991 Review Tranche Two – Terms of Reference had already been agreed in advance of the final release of the Strategy. This raised questions regarding how much influence the Strategy will have over the CMA review. PEPANZ commented that "This contradicts the core purpose of the Resource Strategy... The process, as now revealed, unfortunately reduces confidence in the significance and weight of the Resource Strategy".

Cumulative impact of Government changes on sectors in the economy

198. A number of submissions from industry raised concern in regards to the number of workstreams taking place at the moment that could adversely impact the mining sector in New Zealand.
199. Bathurst Resources Limited/BT Mining Limited commented on a range of simultaneous Government initiatives (such as No New Mines on Conservation Land)

which “taken together these initiatives (unless significantly modified in their passage through to binding legislation and regulation) will act to prevent almost all productive economic activity outside of urban areas and except perhaps on already heavily modified rural areas”.

200. J Swap Contractors sought to highlight the need to promote a wider understanding across all relevant agencies of the need to accommodate the minerals extraction industry and ensure the overall ambition of the Strategy is achieved. The WCRC commented that “the proposed Strategy is unclear on how conflicting national policy will be reconciled.

Conclusion

201. We appreciate the quality of submissions we received and recognise the thought that went into them. The diversity of submissions demonstrates the wide ranging views across the country regarding how New Zealand should manage its petroleum and minerals resources.
202. We were pleased there was majority support for most of the elements of the Strategy. Many of the submissions sought greater emphasis on certain elements already contained within the existing Strategy.
203. Given the diversity of opinion, we believe the final Strategy strikes an appropriate balance between environmental groups, industry and Māori and community interests.
204. Most of the submissions (redacted in line with standard proactive release procedures) can be found on MBIE’s website.
205. MBIE thanks the submitters for their contribution. We have, where possible, attempted to better reflect the views of submitters in the final Strategy document.

Annexes

Annex one: Consultation questions from the draft Strategy 'A Minerals and Petroleum Resource Strategy for Aotearoa New Zealand: 2019-2029'.

Public consultation questions

Your details

1. ***Name:** _____
2. ***Email:** _____
3. ***Is this an individual submission or on behalf of a group or organisation?**
 - Individual
 - Behalf of group or organisation
4. **Business name or organisation (if applicable):** _____
5. **Position title (if applicable):** _____
6. **If you are submitting as an individual or individuals, please indicate which group you most identify with or are involved in?**
 - Iwi or hapū
 - General public
 - Environmental
 - Minerals sector
 - Quarrying sector
 - Oil and gas sector
 - Other....please specify _____
7. **If you are submitting on behalf of a group or organisation, please indicate which type of group your submission represents.**
 - Iwi or hapū
 - Non-governmental Organisation
 - Local government
 - Minerals sector
 - Quarrying sector
 - Oil and gas sector
 - Research institute
 - Other....please specify _____

Vision

8. *Do you agree or disagree with the overall vision for the minerals and petroleum sector in New Zealand?

Draft Vision: *"A world-leading minerals and petroleum sector that delivers value for New Zealanders, both now and in the future, in an environmentally and socially responsible way".*

a. Why?

9. What is your vision for the minerals and petroleum sector in New Zealand?

10. How can New Zealand sustainably derive value from its petroleum and minerals resources?

Objectives for the minerals and petroleum sector

Do you agree or disagree with each of the following objectives for the minerals and petroleum sector?

11. *Objective for a sector that: *"Responsibly delivers value for New Zealand (a) Supporting a productive, sustainable and inclusive economy (b) Supporting New Zealand's transition to a carbon neutral economy"*.

a. Why?

12. *Objective for a sector that: *"Is productive and innovative"*.

a. Why?

13. *Objective for a sector that: *"Is effectively regulated"*.

a. Why?

14. Are there any other objectives for the minerals and petroleum sector that you would like us to consider in the strategy?

GUIDING PRINCIPLES

Do you agree or disagree with each of the following principles to guide everyone (including the Crown and industry)?

15. Principle: The environment, ecosystems, and biodiversity are respected now and in the long term.

a. Why?

16. Principle: Māori cultural interests are understood and respected.

a. Why?

17. Principle: Support the transition to a carbon neutral economy by 2050.

a. Why?

18. Principle: The impact on people, communities and regions are managed in a just and inclusive way.

a. Why?

19. Principle: Support a circular economy by meeting resource needs through resource efficiency, recycling and reuse.

a. Why?

20. Principle: Actions taken within the mineral and petroleum sector should align with the strategic direction of other related sectors and Government strategies.

a. Why?

Do you agree or disagree with each of the following principles for the Crown?

21. Principle: The Crown honours its duty towards Māori as a Treaty partner, adheres to the Principles of the Treaty of Waitangi and its duty to meet settlement commitments.
22. Principle: The Crown receives a fair financial return for its minerals and petroleum.
 - a. Why?
23. Principle: The Crown regulates in a way that is fair, transparent, reasonable and proportionate.
 - a. Why?
24. Principle: The Crown honours the rights of current permit holders to continue production or exploration activities under existing permits.
 - a. Why?
25. Principle: The Crown makes policy decisions based on the best evidence, and accounting for the foreseeable need for minerals and petroleum, both now and for future generations.
 - a. Why?
26. Principle: The Crown proactively engages and consults with relevant stakeholders and decisions are communicated in a clear and transparent way.
 - a. Why?

Do you agree or disagree with each of the following principles for Industry?

27. Principle: Pursue continuous improvements in health and safety.
 - a. Why?
28. Principle: Strive to implement industry best practice in operations.
 - a. Why?
29. Principle: Seek innovative ways to improve the resource efficiency of extraction operations; and minimise the negative impacts of these operations.
 - a. Why?
30. Principle: Engage with stakeholders and implement management systems to understand and manage impacts, and realise opportunities for redress where needed.
 - a. Why?
31. Are there any other principles you would like us to consider in the strategy?

ACTION AREAS

Do you agree or disagree with each of the following Action Areas for the Government?

32. Action Area: Modernising the Crown Minerals Act
 - a. Why?
 - b. What future actions would you like us to consider under this Action Area?
33. Action Area: Securing affordable resources to meet our minerals and energy needs
 - a. Why?
 - b. What future actions would you like us to consider under this Action Area?
34. Action Area: Improving Treaty partnership
 - a. Why?
 - b. What future actions would you like us to consider under this Action Area?
35. Action Area: Improving stakeholder and community engagement
 - a. Why?

- b. What future actions would you like us to consider under this Action Area?

36. Action Area: Improving industry compliance

- a. Why?
b. What future actions would you like us to consider under this Action Area?

37. Action Area: Research and investment in better mining and resource use

- a. Why?
b. What future actions would you like us to consider under this Action Area?

38. Are there any other action areas you would like us to consider as part of advancing this Strategy?

OTHER

39. Are there any other comments you would like to make about the “Minerals and Petroleum Strategy for Aotearoa New Zealand: 2019-2029”?

USE AND RELEASE OF INFORMATION

The Privacy Act 1993 establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including MBIE. Any personal information you supply to us in the course of making a submission will only be used for the purpose of assisting in the development of the Strategy.

40. *We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?

If we can include your submission on the website, can we include your:

41. Name
42. Email address
43. Business name or organisation
44. Position title
45. Group you most identify with (if submitting as an individual)
46. Group your submission represent (if submitting on behalf of a group or organisation)
47. If there are any other parts to your submission that you do not want public on the website please note them below

*Notwithstanding the above, if MBIE receives a request under the [Official Information Act 1982](#) (OIA) for a copy of submissions, it will need to make its own assessment of whether the information should be released, including whether it is in the public interest to release the information received. In this case, MBIE will endeavour to consult with the submitter prior to making its decision on the request.

48. If there is information in your submission that you wish to remain confidential, please note them below

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