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Ministry of Business, Innovation and Employment
Resource Markets Policy
PO Box 1473
Wellington 6140
Via email: resourcesfeedback@mbie.govt.nz

Tēnā koutou

DUNEDIN CITY COUNCIL SUBMISSION ON THE DRAFT MINERALS STRATEGY TO 2040

Introduction

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the draft Minerals Strategy to 2040 (the Strategy).
2. The DCC acknowledges the intention of the Strategy to provide a pathway for growth for the mining sector in New Zealand and the value in undertaking a stocktake of New Zealand's known mineral potential as a way of informing future options, costs and benefits and decision making.
3. This submission outlines and addresses DCC's concerns around the impacts and implications of the Strategy for: the safety of drinking water, the fulfilment of the Government's obligations under the Treaty of Waitangi, and climate emissions and wider environmental health.

Submission

Drinking water safety

4. The DCC submits that the potential impacts of mineral extraction activities on sources of drinking water need to be carefully managed to ensure the drinking water supplier's ability to supply safe drinking water is not compromised. The DCC observes that permits for mineral extraction in drinking water catchments can be issued without specific prior consultation with the drinking water supplier.
5. The DCC recommends that safeguards are built into the permitting system to ensure mineral extraction is not permitted in existing drinking water catchments without implementation of appropriate controls to protect water quality. Specific actions to protect sources of drinking water from any adverse impacts of mineral extraction activities should be added to the list of actions under the strategy actions identified in the Strategy, including action 2 (Ensure secure, affordable and responsible access to the minerals we need) and action 3 (Develop a more enduring, efficient and responsible regulatory framework).
6. The DCC suggests, as an example of a specific action, to add under strategy action 3 an amendment to the permitting system to provide for the drinking water supplier, Taumata Arowai (the drinking water regulator) and the relevant regional council (the environmental regulator) to be involved in assessing mineral extraction permit applications and associated controls. This involvement should be required whenever permission is sought for mineral

extraction activities in a drinking water catchment identified by the drinking water supplier in its source water risk management plan and/or by a regional council in its regional plan.

Treaty of Waitangi obligations

7. The DCC notes that the Strategy allows for post-settlement hapū and iwi to have discussions about protocols around mining once consent has been granted. However, the level of influence mana whenua has within these discussions needs greater clarity.
8. The DCC outlines the particular interest for mana whenua across the country as mining can have devastating impacts on not just the whenua (land), but te taiao (the environment) as a whole; a taonga for Māori that is protected under Article 2 of the Treaty of Waitangi (the Treaty).
9. The DCC further notes that consents for mining (especially if allowed to go through Fast-track Approval processes) have significant risks of impacting waterways in Aotearoa New Zealand – going against the concept of Te Mana o te Wai. It is of paramount importance that the Strategy does not go against the obligation hierarchy of Te Mana o te Wai, which at the top is the health of freshwater and waterbodies.
10. The DCC is concerned about the lack of specific in-depth discussion of the Treaty and how the Strategy aims to meet the government’s Treaty obligations as a good treaty partner. This leaves a large gap that would enable Māori to ensure their voice is captured within the draft and how it would impact their areas of traditional authority. The Strategy makes consistent comments that the mining will be environmentally responsible; however, no specific commentary about how this will be achieved and no confirmation ensuring tangata whenua are brought into this conversation is mentioned.
11. The DCC notes that the Strategy discusses implementing “improved reporting on environmental, cultural and social net benefits to their communities” yet lacks details on what these net benefits are. In reference to Article 3 of the Treaty, Māori need to be able to see that they will have an equitable benefit in this Strategy if mining is to go ahead.
12. The DCC is concerned by the minor part of commentary around the Treaty. The DCC requests greater clarity about how all Māori (not just those with post-treaty settlements) will benefit and express their tino rangatiratanga.

Wider environmental impacts

13. The DCC highlights that increasing coal mining and exports, and continued reliance on coal is contrary to climate emissions reduction targets, given the significant emissions associated with mining and burning coal. Therefore, the DCC urges that the Strategy phases out coal mining, and renounce increasing coal exports. The DCC considers that the Strategy should outline a plan to ensure a just transition for employees and communities currently reliant on coal mining to enable them to transition to other employment and economic activities.
14. The DCC supports the reduction of the environmental impacts of mining and promotes Aotearoa New Zealand's reputation for more responsible mining. Accordingly, the DCC considers that the Strategy should:

- Prioritise mining for the minerals necessary for a clean energy transition only – while minerals to enable decarbonisation is mentioned in the introduction, there are no specific targets or actions for these.
 - Include an action to undertake lifecycle environmental assessments of any mining activity (including emissions, biodiversity, and other impacts) – firstly to seek to avoid any negative impacts, then fully mitigate unavoidable impacts.
 - Add to the "success" criteria Aotearoa New Zealand's self-sufficiency of minerals (rather than just focusing on exports).
15. The DCC commends the Strategy on considering a circular economy of minerals; however, the DCC submits circular economy of minerals should be prioritised with more specific actions particularly by including data collection and analysis of current waste stream minerals to identify opportunities to recover precious metals for re-use, and ongoing data monitoring to track progress.

Conclusion

16. The DCC thanks the Ministry of Business, Innovation and Employment for the opportunity to submit on the draft Minerals Strategy to 2040.
17. The DCC welcomes the opportunity to speak to this submission at any hearings.

Kā mihi



Jules Radich
MAYOR
DUNEDIN CITY COUNCIL