

Submission from Straterra to the Hearings Panel Te Tai o Poutini Plan – Strategic Direction October 2023

Introduction

1. Straterra is the industry association representing the New Zealand minerals and mining sector (including coal). Our membership is comprised of mining companies, explorers, researchers, service providers, and support companies. We welcome the opportunity to make these comments to the Hearings Panel of Commissioners on the Recommended Amendments to the Strategic Directions Chapter of the Proposed Te Tai O Poutini Plan.
2. This is further to our submission on the [Proposed Te Tai o Poutini Plan](#), and is complementary to that submission. All the points made in the November 2022 submission stand.

West Coast minerals

3. We are making this submission because of the importance of mining on the West Coast and the importance of West Coast minerals to New Zealand.
4. Mining is among the largest contributors to gross domestic product (GDP) on the West Coast. In the year ending 31 March 2022 it accounted for \$183.3 million of regional GDP and mining is the third-largest source of GDP in the region after dairy cattle farming, and electricity and gas supply. The indirect contribution mining makes is much greater, through the flow on effects of mining economically and socially.
5. In Buller, the contribution of mining is 19.6% of GDP. To put this in perspective, in Wellington, the contribution to GDP of the entire public service is 12%.
6. Mining is one of the most productive sectors in the West Coast economy as measured by output per hour worked. This translates into high wages. Mining jobs pay almost double the median on the West Coast.
7. The West Coast is arguably the most mineral rich region in New Zealand. Pounamu, serpentine, gold, coal, limestone and schist, as well as rock, gravel and sand have been extracted on the West Coast for decades and in some cases, for hundreds of years.
8. Deposits of heavy mineral sand deposits (containing minerals such as titanium bearing ilmenite; garnet, widely used as an industrial mineral; and rare earth elements, used in wind turbines, magnets, electric vehicles and medicine) also occur in sizable quantities along the West Coast.
9. In recent years, on the back of better technologies and higher market prices, geologists and miners have taken a new look at these coastal resources. As the world transitions towards a lower-carbon future, the West Coast has a role to play in supplying more critical minerals used in green technology and to generate renewable energy.
10. At the same time, traditional minerals such as coal and gold are important now and in the future. Coal is needed in the transition to a low carbon economy which is likely to take many decades. It is used to

make steel, in food production, to generate electricity, and is an important export for New Zealand, going to many of the big steel making countries in Asia. Coal's role in food production and electricity generation cannot be removed before there are reliable, affordable, readily available alternatives.

Submission

11. It is important that the plan provides for the mining of **all** minerals and that a consenting pathway for this is available throughout the coast, including outside of the two special purpose zones for mineral extraction provided for in the plan.
12. The special purpose mineral zones are important for the certainty this provides to existing businesses. But enabling mineral extraction outside those zones is also important because, as is acknowledged in the proposed plan, mineral deposits are locationally constrained, that is, they can only be mined where they are located.
13. This characteristic makes zoning as a planning tool challenging. There are mining deposits that are currently unknown or yet to be accessed, many of these are critical minerals that will be crucial to building a low emissions future. It would be shortsighted for the plan to not provide for extraction of these given the global demand that outstrips supply.
14. Also, the West Coast relies heavily on locally sourced aggregate resources for infrastructure repair following natural disasters, for road and rail transport corridors, major projects and for housing development. It's important that these are readily accessed locally. It makes no sense to add cost and environmental footprint trucking in aggregates that are available within the region.
15. The rest of this submission focuses on the Strategic Directions chapter and recommended amendments as set out in Appendix one of the officers s42A hearings report.

Strategic Directions Overview

16. We support the Strategic Directions Overview – including the recommended amendments.
17. We particularly support point 4:
Enabling the use and development of natural and physical resources whilst protecting the natural, cultural and heritage values that have been elevated to matters of national importance by the Resource Management Act 1991 and those matters of national and regional significance by National and Regional Policy Statements.
18. This is a balanced statement that recognises the value of developing the resources available to the West Coast, but doing so in such a way that protects the natural, cultural and heritage values. Straterra fully supports this approach for the mining industry.
19. Regarding point 5, we note “including agriculture” has been added as a recommended amendment. We recommend “and mining” be added to this because of the contribution it makes to a prosperous economy.

Mineral Extraction Strategic Objectives

20. We strongly support the Strategic Objectives, MIN-O1 to MIN-O6, of the Minerals Extraction chapter. These set out the overarching direction for matters relating to mineral extraction and allow for a consenting pathway.
21. We support the thrust of the recommended amendments. Two of these amendments (those in MIN-O1 and MIN-O2) aim to strengthen that adverse effects on the environment from mining are managed. We think these amendments are reasonable and we support them in principle, as we acknowledge it is important that mining's adverse effects on the environment are appropriately managed.

22. MIN-O2 specifies the Special Purpose Mining Zones as well as the General Rural and Open Space Zones as zones in which mineral extraction is enabled. MIN-O3 goes on to say a consenting pathway is still available for mineral extraction activities in a range of locations outside specified zones. We support the rationale given – that mineral resources are widespread and fixed in location throughout the region. The fact that mineral deposits are locationally constrained and discrete, and their location is not always known, means mineral extraction can only occur where minerals are found and so it’s important that where they are located outside these zones, a consenting pathway is provided.
23. The amendment to MIN-O3 highlights the economic and social benefit to the region and nation and clarifies that significant adverse effects must be managed in accordance with the effects management hierarchy, which we support.

Ensuring the Strategic Objectives flow through to the rest of the plan

24. In the proposed plan the following, very important, sentence followed at the end of MINO1-O6.

For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.

25. We note this does not appear in the recommended amendments, neither left as is, nor marked as deleted, and so we are not certain what its status is.
26. It is important this sentence is retained as is, as it reinforces that other chapters of the plan are to be read and achieved in a manner consistent with these strategic objectives.
27. In our original submission we recommended that the Mineral Extraction Strategic Objectives are referred to in the overview sections of all the relevant chapters and that links to them be included. There would be text along the lines of: The strategic objectives had to be given regard to.... This would help ensure the plan is read and achieved in a manner consistent with these strategic objectives.
28. The Section 42A Officer’s Report responded to this recommendation saying no objective has greater weight than another. This might be so, but we argue that doing so would provide more clarity and certainty for the consideration of resource consent applications.

Provisions of plan not as enabling as intended by the Strategic Objectives.

29. Our original submission emphasised that while the wording of the Mineral Extraction Strategic Objectives is appropriately permissive, there are provisions throughout the rest of the plan that mean that mining activities are not sufficiently enabled as intended. It is important that these are addressed as per that submission.

Recommendations

	Recommendation	Reason
Strategic Directions Overview	Add to the end of point 5, “and mining”	Mining deserves to be specified as much as agriculture as a primary industry business activity.
MIN 01-06	At the end of MINO1-O6, reinsert the sentence: <i>For the purposes of preparing, changing, interpreting and implementing Te Tai o Poutini Plan all other objectives and policies in all other chapters of Te Tai o Poutini Plan are to be read and achieved in a manner consistent with these strategic objectives.</i>	This reinforces that other chapters of the plan are to be consistent with the strategic objectives.