

Submission from Straterra To Department of Conservation Biodiversity Strategy September 2019

Introduction

1. Straterra is the industry association representing the New Zealand minerals and mining sector. Our membership is comprised of mining companies, explorers, researchers, service providers, and support companies.
2. We welcome the opportunity to make this submission on [Te Koiroa O Te Koiroa](#), a discussion document on proposals for a biodiversity strategy for Aotearoa New Zealand.
3. We agree with the discussion document about the intrinsic value of biodiversity and the need for it to be cared for. We also agree that New Zealand's prosperity is built on our natural environment.
4. We do not think the Discussion Document does a good job in explaining how biodiversity goals can be met without compromising the social and economic wellbeing of New Zealanders. There are trade-offs of course, and we argue that mining can, and should, enable better bio-diversity outcomes.
5. The Biodiversity Strategy will be an influential document because it will guide a number of government decision making processes. Throughout the document there is heavy use of terms such as protect and significant. These terms have loaded meanings and we are concerned that they could be interpreted by users of the strategy as prohibiting economic activity.

The importance of mining

6. The products of mining make an essential contribution to society. This is often not well appreciated by the public at large in terms of the importance of minerals to modern living standards and the need for new minerals for the proposed low carbon economy, as well as the economic contribution to regional New Zealand through the jobs created.
7. Page 10 of the document provides figures on the economic contribution of land-based primary production (in a positive context) but it fails to mention the extractives sector. Mining in New Zealand contributes \$2.25 billion to the national economy, employs 4200 people and earns around \$1 billion in export receipts. What we don't mine, we import, typically in finished products. While mining does not come under the ambit of the Ministry of Primary Industry

(where the statistics provided were sourced from), it is included in the National Planning Standards definition of primary production.

Minerals are scarce and location-specific

8. Mineral and aggregate deposits are limited in quantity, location and availability. They can only be sourced from where they are located and where the industry is able to access them. The environmental standards and conditions under which we allow resources to be developed are much more rigorous than most other countries. The reality is though, where approval to mine has been given, mining inevitably will need to disturb these areas.
9. New Zealand has a choice as to whether to utilise its limited endowment of these resources, or not. In choosing not to use our endowment we are explicitly choosing to shift mining or business activity offshore, to allow extraction and processing to occur in places that are likely to have much lower standards of environmental management and humanitarian welfare than we have in New Zealand. What we don't mine or produce in New Zealand we will import, usually in finished products. Either way these explicit decisions need to be made, transparently and openly.
10. The discussion document gives no sense of where extractive industries are viewed as sitting within the proposed strategy. Other land-based industries are given much more prominence and we are concerned that mining and coal are sometimes conflated and that the evidence for the net impact of mining on biodiversity is, at best, selective.
11. Tourism is championed in the discussion document as being important to encouraging and enabling people to become champions of our environment, but the tourism sector is also significant in terms of its environmental impact by way of emissions and biodiversity impact etc. The creation of bus and car parks alone for example leave a permanent impact on biodiversity and the total area of these nationwide, including on DoC land, are significant compared with mining's footprint. The footprint of ski fields on DoC land exceeds that of mining.
12. Mining does impact on biodiversity, but its footprint is relatively small (0.04% of DoC land for example) and the contribution it makes to enhancing biodiversity is often overlooked.

Mining's positive contribution to biodiversity

13. Proposed System Shift 3 - Communities are empowered to take action (pg. 46), says enabling businesses to act is critical to making real change and improving biodiversity outcomes. This sits alongside one of the 2050 goals of Every business helping to restore nature (pg. 33).
14. We support these but the fact is mining and other land-based businesses do make positive contributions to biodiversity and are in fact already helping to restore nature.
15. Mining companies provide direct financial support on initiatives such as pest control as well as general research and development of knowledge around the ecological and biodiversity values of a particular area. Compensation is also payable to the Department of Conservation when mining within the conservation estate. Profitable mining activities provide the industry with the necessary long-term funding and knowledge needed to achieve biodiversity improvements in the area.

16. Of these, pest control is important. Stoats, possums and rats have far more adverse impact on biodiversity than mining and other land-based industries largely due to mining's relatively small footprint. Freeing New Zealand from these pests is one of the goals of the Strategy which the industry supports and can and will assist with.
17. Mining as an activity is highly diverse. An alluvial gold operation and a hard rock gold mine have little in common in terms of environmental impact, and ability to offset specific impacts.

Mining is a temporary land use

18. Mining is a temporary land use, with site restoration a critical element to ensure that land is eventually returned and made available for future generations. The extractive sector takes a long-term approach in land and resource strategies and operations – this aligns with the long-term focus on this strategy. Right from the mine's commencement, planning starts for its return to nature. Resource consents are provided on this basis.
19. In many cases, site restoration can result in the delivery of valuable new habitats, contributing towards national biodiversity targets and wider 'net gain' ambitions. This includes vegetation direct transfer and other advanced techniques. Innovative ways are found to return former mines and quarries to communities as lasting assets that contribute towards the delivery of positive biodiversity and nature conservation outcomes. For example, Halswell Quarry and the Isaac Conservation and Wildlife Trust in Christchurch.

National Policy Statement for Indigenous Biodiversity

20. On pages 39 and 40 (Shift 1: Getting the system right), the upcoming National Policy Statement for Indigenous Biodiversity (NPSIB) is referred to. We understand that the NPSIB is being drafted and will soon be released for public discussion. We have some major concerns about this and the public consultation on it will be very important.
21. The draft NPSIB that was released by the Biodiversity Collaborative Group in October 2018 creates a new minimum standard of avoidance for land clearance in areas of significant indigenous habitat. In our view, this is unduly cautious and significantly prohibitive of mining, and with it significant investment in biodiversity, continuing in this country. In its current form, the NPSIB will remove access to the management and mitigation hierarchy. We believe it is too cautious, too prescriptive and too weighted in favour of preservation, setting land aside away from not only development but also proactive, appropriately funded biodiversity management.
22. The second priority action on page 40, to deliver the NPSIB through council plans and resource consent decision, will have significant implications for the sector if it is enacted in its current form.

Humans and biodiversity

23. There are several references in the Draft Strategy to the interactions between humans as a species and the ecosystem as well as the wellbeing of humans from a biodiversity perspective (e.g. page 6). These are important but obviously human wellbeing is much broader than this, as was emphasised in some of the public consultations we attended.

24. As stated earlier, mining's contribution to the economy and society is significant. Mining provides essential products off a very small footprint and under independently considered conditions. Mining is an industry which creates well-paid jobs and is particularly important to regional economies. The industries that are often identified as alternatives to mining will not make the same economic contribution as mining which is among the highest productivity and highest average wage industries in the country.
25. Mining's contribution to wellbeing in the areas it is active include things such as healthcare/ medical services, public facilities (e.g. swimming pools, community vans), voluntary services (e.g. rural fire), funding of sporting teams, involvement in community organisations.