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Schedule 4 Stocktake
Ministry of Economic Development
PO Box 1473, Wellington 6140

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Re: Submission to Schedule 4 Stocktake

Introduction:

Transition Town Invercargill is a non-profit community organisation. We are one of over 50 Transition Initiatives in New Zealand, and over 1000 around the World. Transition Initiatives aim to ensure that our communities are prepared for and can thrive in a world that is changing significantly under the effects of climate change and the end of cheap oil (known as Peak Oil).

One of conditions for a successful transition is the strengthening of the sustainability and resilience of communities i.e. their ability to deal with shocks - environmental, economic or social. In order for individuals, communities and nations to be resilient, we require a healthy environment and healthy, well balanced communities.

It appears that climate change is not a very high priority for the Government, and Peak Oil appears to be completely off the radar. In this New Zealand is very much lagging behind other developed countries, particularly those in Europe. We are concerned by this short-sightedness of the Government; instead of addressing these pressing issues the development direction has been that of the old-school growth-at-all-cost.

The proposal to remove from Schedule 4 and mine some of the highest valued public conservation land, disregarding the effects this will have on the cultural, social, economic and environmental wellbeing of certain communities, is most concerning. Not only does this proposal manifest disregard of the Government for the values that New Zealanders hold dear and sacred, it also has the potential to reduce the ability of some communities to become more sustainable and resilient. It could increase New Zealand liabilities under the Kyoto protocol, and it certainly diverts funding and human resources from addressing more pressing issues.

The motive for the proposal is particularly worrying. It is not even to address some established, national resource shortage but mostly to achieve the dubious goal of 'catching up' with Australia!? The Australian economy is hardly an ideal to aim for (and not many countries do). It must be one of the most unsustainable economies in the developed world. It is based on selling off non-renewable resources such as coal and minerals, and has depleted soils and an escalating water crisis due to mismanagement of water and land – not likely a recipe for a prosperous future.

The permanent loss of natural capital in form of minerals and other non-renewable resources cannot be accounted for by just counting the extraction cost. Mining, by definition, is not a sustainable activity; mineral reserves are finite. When they are gone, they are gone forever. The Government should behave like a prudent

steward of our precious mineral resources: conserve them and extract them frugally from areas suitable for this activity. This is our collective responsibility to the present and future generations, to other species and to the planet.

Summary of our submission:

We believe that Schedule 4 lands are worth more to New Zealanders intact. They provide ecosystem services, tourism income, branding, lifestyle and recreation opportunities, and a sense of identity. Mining them does not make sense economically and is morally wrong.

We opposed to any removals from Schedule 4 and any further investigations to assess their mineral potential. Only the Minister of Conservation should have decision-making power of these lands, held in trust for the New Zealand public. We support addition of new lands to Schedule 4 and recommend that such additions become automatic each time new lands are gazetted into Schedule 4.

We oppose the contestable conservation fund but instead want to see DOC's 2009 budget reinstated, as well as the Green Party's Community Conservation fund and the Enviroschools funding restored.

Further recommendations:

1. Add the following high-value conservation area types to Schedule 4: national reserves such as Lewis Pass; all of our World Heritage areas (Te Wahipounamu, Tongariro and the Sub-Antarctic islands), and all ecological areas.
2. Prohibit all open-cast mining and tailings dams on public conservation land.
3. Remediation on mined land has to be full responsibility of the mining companies.
4. Public notification of mining applications has to be compulsory.
5. Instead of focusing on mining the Government to undertake a thorough stocktake of the effects the imminent Peak Oil and its widespread consequences will have on New Zealand's society and economy, and prepare and implement a firm strategy to deal with it.
6. Invest in energy, resource and land conservation rather than further generation and extraction.
7. Commit to, plan and implement at least a 40% reduction in GHG emissions by 2020.

SUBMISSION

Section 4: Areas proposed for removal from Schedule 4

Proposed: 7000 ha to be removed from Schedule 4 immediately so that mining can be considered on a 'case-by-case' basis.

Schedule 4 areas are protected for a reason. They are protected for their high conservation, biological, cultural, recreational and tourism values. While some of these values are not as easily qualified, they are far bigger than any potential mineral values.

The income the government is potentially going to derive from mining is relatively small and does not outweigh the damage mining of Schedule 4 land would directly and indirectly cause to these areas (according to Statistics NZ, the royalties from mining in 2009 were \$6.5 million or only just over 0.1% of the \$6 billion mining revenues – the rest was profit for the mainly foreign-owned, private mining companies). On one hand, there would be irreversible damage to pristine environment. On the other hand, there would be damage to people: potentially loss of the sometimes unrecognised ecological and biological services these areas provide

to us for free, water supply and water quality reduction, social issues, and damage to people's livelihoods, particularly those involved in New Zealand's number one industry – tourism.

We are very concerned about the fact that the economic and social effects on the affected communities have not at all been evaluated. There are no healthy, well-balanced, wealthy mining communities anywhere in the world, but there are many struggling ex-mining communities. When the mining is finished the communities generally end up with a number of permanent environmental and social problems and few other options. Mining greatly reduces a community's resilience and ability to provide for many of its needs, an ability that should be a priority in a world facing extensive resource depletion.

Recommendation: Oppose all removals from Schedule 4

Section 7: Specific areas proposed for removal from Schedule 4

Te Ahumata Plateau on Great Barrier Island

- Great Barrier Island is a near-pristine gem. It is valued for its scenic, recreational, ecological and tourism values by residents and visitors alike. The effects of mining on this community would be irreversibly destructive to both the community's identity and livelihood.
- **Recommendation:** Oppose removal from Schedule 4

Sections of conservation land on the Coromandel peninsula

- The Coromandel is unique, beautiful, holds significant areas of intact forest and is a sanctuary for threatened species. It is precious to the people that live there, and has huge recreational value to that quarter of New Zealanders living in Auckland, as well as many visitors from further afield.
- **Recommendation:** Oppose removal from Schedule 4

Otahu & Parakawai Ecological Areas in the Coromandel

- These areas are of particular value as the habitat of many of our threatened native species including the North Island brown kiwi, long-tailed bats, Hochstetter's frogs, longfin eels and banded kokopu.
- **Recommendation:** Oppose removal from Schedule 4

The Inangahua sector of Paparoa National Park on the South Island's West Coast

- Paparoa National Park has outstanding ecological and landscape values and is habitat for many threatened species. The most concerning here is that open-cast mining has not been ruled out. Just because it is perhaps less known than the other proposed areas to be removed from the Schedule 4, Paparoa may not be sacrificed to mining interest. In addition, increasing of *any* mining for coal is irresponsible as it will increase the emissions contributing to climate change and affect New Zealand's responsibilities under the Kyoto Protocol.
- **Recommendation:** Oppose removal from Schedule 4

Section 5: Further investigation programme

Proposed: \$4 million is to be spent over the next 9 months on investigating the mineral potential of huge tracts of Schedule 4 land, including the remainder of Paparoa National Park and Rakiura National Park.

We strongly oppose to tax-payers having to give a \$4 million subsidy to the mining industry as they will be the only beneficiaries of the information gained from exploration. This is coming at a time when funding for many initiatives promoting sustainability and community development, as well as other initiatives benefiting the public, had been cut by the Government. This proposal is a particular insult to communities that value their unspoilt environment and rely on it for their livelihood which would be diminished by mining activities.

Recommendations:

- Abandon further investigation programme
- No subsidies for the mining industry
- Reinstate the \$4 million Community Conservation Fund

Section 6.1: Joint Ministerial approval

Proposed: any decision about mineral-related access applications to Crown land would require the joint approval of the Energy and Resources Minister as well as the land-owning Minister (for example the Conservation Minister).

This is an obvious conflict of interest. It would give decision-making power over activities on conservation land to a Minister who should by definition be development focused.

We agree with the Parliamentary Commissioner for the Environment that public conservation land is held in trust by the Minister of Conservation on behalf of the New Zealand public.

Recommendation: Reject joint Ministerial approval for access to Crown Land. Such decisions should be solely with the land-owning Minister (Minister of Conservation).

Section 8: Areas proposed for addition to Schedule 4

Proposed: 12,500 ha for addition to Schedule 4, meaning they are protected from mining.

While this is positive, these additions should have occurred anyway; they have been previously recommended by Department of Conservation staff and are long overdue as they only address an inconsistency.

No addition to the Schedule 4 can 'offset' the proposed removal and mining of high value lands. These additions should be automatic each time new lands are gazetted into National Parks and the other land classification types listed in Schedule 4.

Recommendations:

- Support addition of new lands to Schedule 4
- Amend Crown Minerals Act to make such additions automatic each time new lands are gazetted into land classification types listed in Schedule 4

Section 9: Establishment of a contestable conservation fund

Proposed: establishment of a conservation fund (valued at \$2-10 million annually) from a portion of future mining royalties.

This model is plain wrong. It would mean that more funding for protecting the environment would only be available if more land would be destroyed by mining. We need a genuine conservation fund, not as a reason to allow mining.

In addition, funding from mining royalties will not provide enough funds to maintain high level of core conservation management, and due to its nature would not provide security of funding. Conservation management of public land should be funded from DOC's core budget. This was cut by \$54 million last year. The Community Conservation Fund of \$4 million was also cut, in 2009. Enviro-schools funding was also cut. We want to see this funding reinstated.

Recommendations:

- Abandon contestable conservation fund
- Reinstatement of DOC's 2009 budget cut of \$54 million
- Restore Community Conservation fund \$4million pa
- Restore the Enviro-schools funding

Additional recommendations:

1. Add the following high-value conservation area types to Schedule 4: national reserves such as Lewis Pass; all of our World Heritage areas (Te Wahipounamu, Tongariro and the Sub-Antarctic islands), and all ecological areas.
2. Laws should be changed to prohibit all open-cast mining and tailings dams on public conservation land.
3. Remediation on mined land has to be full responsibility of the mining companies. Under no circumstance should the mining companies receiving any funding from the Government (effectively, from tax payers) to carry out this work they should have to do anyway.
4. Public notification of mining applications has to be compulsory
Tourism operators and other concessionaires have to go through a publicly notified process.
Mining is the only activity that is exempt from public processes and this privileged position should be immediately corrected.
5. Undertake a thorough stocktake of the effects the imminent Peak Oil and its widespread consequences will have on New Zealand's society and economy, and prepare and implement a firm strategy to deal with it.
6. Invest in energy, resource and land conservation rather than further generation and extraction, including but not limited to:
 - development of a comprehensive public transport system (particularly in Auckland)
 - reinstatement of a nation-wide rail system
 - urban planning for a less-motorised and higher-density urban living
 - amendments to land use laws to prevent urban sprawl and wasting of valuable agricultural land and the need for more roads and transport fuels
 - amendments to Building Code increasing the energy efficiency of buildings (passive heating and ventilation, insulation, water conservation etc).
 - introduce incentives for organic food production restoring the natural fertility of the land
7. Take more than a token stand in matter of climate change and commit to, plan and implement at least a 40% reduction in GHG emissions by 2020.

Judith Robinson

For Transition Town Invercargill steering group