

Submission from New Zealand Minerals Council Implementing New Zealand's Biodiversity Strategy June 2025

Introduction

1. New Zealand Minerals Council 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 the discussion document, [Action for Nature – Implementing New Zealand's Biodiversity Strategy 2025–2030](#).
3. We generally support the strategy and the importance of protecting / enhancing biodiversity. The minerals sector will continue to play its part in this through working collaboratively with local communities, councils, and the Department of Conservation (DoC).

Key points

4. The mining sector makes significant financial contributions to conservation and other direct conservation efforts as part of its day-to-day work.
5. The mining sector is not looking to change the settings to further open access to conservation land. But it does want to continue the access it has.
6. External funding is needed if New Zealand it to improve its record in achieving positive biodiversity outcomes.
7. While we are open to a rebalancing of conservation charges, we would not support an increase in the overall revenue raised from miners.
8. We support the concept of a biodiversity credit scheme which would provide a useful revenue stream for DoC, complementing traditional ways of financing projects that support and conserve nature.

General comment

9. Before addressing the discussion document, we make these general comments on mining's connection with the biodiversity strategy and conservation land.

The mining sector's contribution to biodiversity

10. As with other land-using industries, mining activities have an impact on biodiversity, but the overall impact is smaller than many think. Not only does mining's footprint touch just a tiny proportion of New Zealand's land area, the sector makes significant financial contributions to conservation and other direct conservation efforts as part of its day-to-day work.
11. Its contributions to eradicate pests and weeds, which are by far the greatest threats to indigenous biodiversity, far bigger than mining, have been significant. Miners also put a lot of resource into mine

site rehabilitation, tree planting, wetland creation and restoration, etc. and are doing innovative, world-leading work in these areas.

12. Under the current resource management regime, mining consents have conditions attached to manage impacts on biodiversity and other adverse environmental impacts. When all conditions are considered, a mining project can make a positive contribution to biodiversity, the environment, and to society.
13. Conservation and other work over and above mining approval conditions is often done as mining companies work to contribute to the communities in which they operate. Mining companies care for the places they mine. All in all, there has been improved awareness in recent years by miners of the importance of biodiversity management and conservation and aiming to achieve positive biodiversity outcomes is now best-practice in mining and quarrying.
14. As examples, near Reefton on the West Coast, OceanaGold has planted close to a million trees over 282ha on a former mine site. Department of Conservation (DoC) staff have called the restoration “world class”. Bathurst Resources has committed to 35 years of pest and predator control over 25,000ha of Kahurangi National Park, and for 50 years over about 4500ha of the Denniston Plateau and surrounding beech forest.
15. Mining and other commercial uses on the conservation estate make significant financial contributions to DoC’s work and there is potential to contribute more to conservation management. This was acknowledged by former Parliamentary Commissioner for the Environment, Jan Wright, when she said, “commercial use (including mining) of the conservation estate offers an opportunity to address some of that funding shortfall”.

Mining on conservation land

16. The minerals sector has a close connection with both DoC and the Biodiversity Strategy with approved mining projects occurring on conservation land (which makes up a third of New Zealand’s land area). Such mining activity is consented under the Resource Management Act (RMA) and other regulatory regimes on a case-by-case basis to minimise/manage its impact on biodiversity, as stated above.
17. DoC must issue access agreements to mine on its land under a range of criteria including assessed conservation values, and conditions additional to, or overlapping those set under the RMA.
18. Mining on conservation land is infrequent, and its footprint is small. Only about 3,500 hectares or 0.04% of the conservation estate has been disturbed by mining. The footprint is small because economic mineral resources are hard to find – mining only occurs where the minerals are present and economically recoverable – and must meet the consent conditions imposed under the RMA and other applicable legislation. Applications are able to be made on any conservation land, excluding national parks and other Schedule 4 land.
19. The status quo works well where mining applications are considered on their merits against the conservation values of the land in question. This case-by-case approach is superior to one based on land categorisation (for example allowing mining on stewardship land only) because it doesn’t rule out potential opportunities before they are considered.
20. The mining sector is not looking to change the settings to further open access to conservation land. But the sector does want to continue the access it has.

Theme 2: Increased external funding, revenue and support is delivering more work on biodiversity priorities

21. Our comments on the document are focused on Theme 2 and the issue of funding.
22. We agree that increased external funding is needed if New Zealand it to improve its record in achieving positive biodiversity outcomes. This applies to public and private land, including Māori land.
23. It is well understood that DoC in particular does not have sufficient funding to make a real dent on the conservation estate and given the Government's other priorities this is unlikely to change.
24. We understand DoC's budget to finance predator control covers around 500,000 hectares out of 8.6 million hectares, a mere 6% of the conservation estate. The shortfall is so large that even significant increases in DoC funding would not be able to make the kind of difference needed.
25. There is a role for the private sector to further supplement government funding in these areas through voluntary contributions, or by paying compensation for adverse environmental impacts through land (and potentially marine) activities.
26. As discussed earlier, the mining sector's financial contribution to eradicating pests and weeds is considerable, as it is in other areas of biodiversity enhancement activity.

A biodiversity credit scheme

27. We support the concept of a biodiversity credit scheme (BCS) which would provide a useful revenue stream for DoC, complementing traditional ways of financing projects that support and conserve nature and funding additional biodiversity improvements.
28. Investors from the private and voluntary sector would purchase biodiversity credits which would help fund projects that actively protect and restore ecosystems.
29. Public and private sector landholders, including miners, who are undertaking such projects would generate the credits. They would be able to sell these credits to potential investors who see benefit in contributing to such a conservation project. For example, tree planting and other such biodiversity enhancements associated with mine rehabilitation should be open to biodiversity credits.
30. They would have the option of selling them either directly to an investor, to a biodiversity credits market, or to another developer to offset development impacts where measures to protect the environment are less available.
31. The system should be open to international investors as well as domestic investors, thus attracting investment in New Zealand. Investors would have a variety of motivations to participate including through the recognition and reputation enhancement it would provide them.
32. Biodiversity credits need to have integrity. Prospective investors would want to be confident that credits can be trusted and have an impact. The system must not be allowed to be a vehicle for greenwashing.
33. Biodiversity credits should sit alongside the environmental effects hierarchy in resource consenting. As well as selling credits, miners and other land-using sectors could purchase them to complement on-site mitigation measures.

Action 3 – Develop a biodiversity investment prospectus to attract and direct external investment into biodiversity priorities.

34. We agree with the proposal to develop a biodiversity investment prospectus. This would present a set of investment-ready priority projects to potential funders, including businesses, philanthropists, NGOs and iwi, and seek their investment or co-funding.
35. A biodiversity investment prospectus could also be a constructive part of a biodiversity credit system.

Action 4 – Generate new revenue from public conservation lands and waters to invest back into biodiversity.

36. As discussed, we agree that DoC should seek new sources of revenue in addition to what it already receives from government. The mining sector could be a part of this, although we stress, we do not support increased or new charges for miners.
37. Miners already make a significant contribution to DoC. They pay a number of charges for access arrangements and concessions. These include “activity fees”, “management fees”, “monitoring fees”, “industrial intrusion” charges, and various other charges to deal with compensating for the loss of conservation values. As well as making the charging system complicated and oblique, the total payment to DoC is substantial.
38. We support a review of these fees and charges with a view to reconfiguring and simplifying DoC’s and the Government’s revenue raising mechanisms so that they are better fit for purpose.
39. The contribution miners make to DoC needs to be considered alongside the other contributions miners make to the Crown collected by other government departments, specifically for minerals permit fees¹, royalties, and energy resource levies (ERLs), as well as general tax revenue.
40. While we are open to a rebalancing of charges, we would not support an increase in the overall revenue raised from miners, as this would have a negative impact on their businesses with flow on effects through the communities they support.
41. An assessment of the contribution the mining sector makes to public conservation and to DoC needs to consider the overall contribution of resources the sector makes to conservation efforts, including voluntary payments and in-kind activities.

¹ There are a range of minerals permit fees, royalties and ERLs. See [here](#).