Submission on Consultation on the Ministry for the Environment's draft Long-term Insights Briefing 2022

October 2022

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 50 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

Background

Accessing, extracting, processing and transporting aggregate (crushed rock, gravel and sand) is needed for the construction of infrastructure in New Zealand. A wide range of industrial minerals are also produced in New Zealand including clay, limestone, perlite, halloysite, bentonite, zeolite, silica, dolomite and serpentine.

It is therefore vital that local aggregate resources throughout the country are identified, understood and effectively managed. Quarrying is a high value and temporary land use, with site restoration a critical element to ensure that land is available for future generations. In many cases, site restoration can result in the delivery of valuable new habitats, contributing towards national biodiversity targets and wider 'net gain' ambitions.

We make the following submissions in relation to the Consultation on the Ministry for the Environment's draft Long-term Insights Briefing.

General comments

We generally agree that the health of the land and wellbeing of people are closely interconnected because land is central to Aotearoa New Zealand's economy, culture and many other aspects of society.

The Government's Resources Strategy for 2019-2029 clearly states; "*Projections indicate that the population of New Zealand could grow as high as between 5.3 and 7.9 million by 2068. To meet the needs of this growing population we will require more housing, more energy, and expanded infrastructure. The minerals and petroleum sector has a critical role to play in building this future. We need to make sure we have the aggregate (crushed rock and stone) required, or alternative replacement material, to build the foundations of our houses and roads.*"

Climate change and rising sea levels are going to put added pressure on rock supply for sea walls, riverbank protection and restoration. Based on the advice of the Climate Change Commission, 13 wind farms, each the size of the country's largest, will need to be built in the next 15 years to power the country's new electric cars and boilers. The construction of these wind farms alone will require an additional 1 million tonnes of aggregate and sand.

It is critical that this Long-term Insights document addresses the demand and supply of construction materials, as it is closely linked to the use of land. Much of the 50 million tonnes of aggregate and sand consumed each year by New Zealanders comes from the land.

It is also critical that the sector delivers value now, and into the future in an environmentally and socially responsible way. Sourcing aggregate locally, safely, at reasonable cost and in environmentally sustainable ways is fundamental to New Zealand's future.

Circular economy

We acknowledge the importance of the circular economy in the aggregates sector and generally and maximising the use and reuse of the same resources for as long as possible. However, while increased recycling and resource efficiency will have some impact, technology will need to advance significantly to fully replace the need for extraction of natural aggregates.

In terms of rock needed for climate change mitigation such as seawalls and flood protection, there is currently no substitution for large natural rock and/or concrete elements.

Estimates of available construction and demolition waste in New Zealand suggest that if 100% of these products could be recycled, it could replace 2% of the current aggregate demand. Recycling and reused products currently represent 4% of the total demand for aggregates and sand.

For a "circular economy" to work, the purpose needs to be established first and then must be supported by incentives for customers and suppliers to re-use or recycle products. Currently there is little incentive for recycling and re-use due to the cost of processing these products relative to natural products and the reluctance of customers to specify and/or allow the use of recycled products. These customers include central and local government who are both significant users of aggregates and sand.

Chapter 2 – Drivers of future land change

We agree with the seven main drivers that could affect the state of the land over the coming years, however the driver, "Economics and consumer demand influence what New Zealanders make and use" needs to be broader as local consumer demand from the land goes beyond food.

New Zealanders will continue to demand warm and affordable houses, protection from the effects of climate change, and well-functioning infrastructure. All of these will consume aggregates and sand, and while alternate products may become available over time, land with accessible resources of aggregate and sand near communities must be protected from non-compatible land uses, so that these resources are available for future generations.

The driver, "Population growth influences demand for and disposal of resources" also needs to include the demand for construction materials which is also driven by population growth.

Chapter 3 – Aspirations for the future of the land

We agree that the land can contribute in different ways to both the economy and identity of Aotearoa New Zealand and that sustaining the land into the future is essential for the physical, mental, and economic wellbeing of every generation.

While extractive industries impact on land, we support the restoration and enhancement of areas that align with national priorities for restoration and enhancement, together with areas identified under targets for increased vegetative cover. Quarries and other extractive industries currently make a substantive contribution to the restoration, enhancement and reconstruction of areas identified in resource management plans and regional biodiversity strategies.

Most quarries are small, with 90% of the 1,100 estimated operating quarries across New Zealand, employing three people or less. Many of these quarries are located in remote rural communities where there's little access to support services that can assist with their conservation and biodiversity enhancement ambitions. Conservation needs to be 'easy to see and easy to do' for these small rural businesses.

Chapter 4 – Transformational change

Increasing effectiveness of policy and legislation

The Government, in consultation with the aggregates sector, needs to confirm the available sources of aggregate and sand throughout the country, including aggregate quality, accessibility and proximity to markets so that those sources identified as critical for the country's future growth, are protected and appropriate provision is made for their development to meet future demand for aggregates.

We consider it imperative that local authorities are directed to protect key resource areas and enable their development, to both protect existing quarries from encroachment of non-compatible land uses such as housing, reduce reverse sensitivity potential, and to enable the expansion of these resources and development of new greenfield resources.

Regulation is important in setting and maintaining good practice. Such regulation must balance the demand for resources, the location and the availability of resources with environmental and socially acceptable standards. It is important that the regulatory

regime does not unnecessarily constrain supply of resources through delay and/or the burden of excessive costs. With additional planning pressures, smaller quarries, may either run out of consented or physical resource, or won't be able to afford a new or replacement consent.

Empowering communities

We agree that enabling actions at the local level is an effective tool for creating resilience and changing the trajectory of pressures on the land over the long term. The quarry industry currently works collaboratively with local communities and councils to reduce our environmental impact and meet legal requirements of environmentally sustainable operations.

Investing in science and mātauranga Māori

We agree that Aotearoa New Zealand has a unique opportunity to benefit from the insights of both science and mātauranga Māori to support the wellbeing of the land and all New Zealanders.

Māori have significant interests in the resource sector and in retaining access for historical, cultural and economic reasons.

Archaeological evidence of early Māori tools, weapons and ornaments demonstrate Māori have been extracting mineral resource since 1400 AD, within 150 years of Māori settlement. Former quarries have been identified where blocks of adzite and obsidian were excavated, and fragments trimmed to a convenient size.

In addition, many Māori work and have business interests in the aggregates sector. The percentage of Māori employed in mining and quarrying is much higher / almost twice as high as the equivalent figure for the population as a whole.

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