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Infrastructure New Zealand's Submission on MBIE's Draft Critical Minerals Consultation List

1. Introduction

- 1.1 Infrastructure New Zealand (INZ) welcomes the Government's release of the draft critical minerals list.
- 1.2 INZ is New Zealand's membership organisation for the infrastructure sector. We promote best practice in national infrastructure development through research, advocacy, and public and private sector collaboration. Our members come from diverse sectors across New Zealand and include infrastructure service providers, investors, operators, and owners.
- 1.3 This submission represents the views of Infrastructure New Zealand as a collective whole and may not necessarily represent the views of individual member organisations. We have also encouraged our members to make their own submissions raising those issues specific to their areas of interest or expertise.

2. General Remarks

- 2.1 Minerals, including aggregates, are fundamental to modern society, serving as essential inputs for critical infrastructure such as roads, energy supply, and other products which support our communities and businesses. They also play a key role in producing low-carbon technologies to achieve net-zero emissions by 2050.
- 2.2 The proposed critical minerals list identifies minerals that are economically important to New Zealand and vulnerable to supply chain risks. We agree that this list will guide policymakers to assess whether Government action is needed to strengthen supply chain resilience, minimising the impact of disruption on the economy. Of the 35 minerals listed, all are important to the economy, some are prone to supply disruption, and many are in high demand internationally.

3. Criteria

- 3.1 While we agree with the criteria used to identify critical minerals, measured as importance to the economy, technology needs, demand from international trading partners and susceptibility to supply chain risk, we agree with the Sustainable Business Council that this also raises concerns regarding the exclusion of certain minerals, particularly coal and gold. This includes minerals such as gold, iron sands, silver and coal which are excluded from the draft list. We urge policymakers to reconsider their inclusion in the list.
- 3.2 We support this inclusion of an additional score for economic importance, instead of only a supply chain vulnerability score, which would likely result in additional minerals being included on the list.

4. Aggregates

- 4.1 We wish to highlight the importance of aggregates in infrastructure development. In 2023, the New Zealand aggregate and quarrying sector produced an estimated 47.9 million tonnes of aggregate, including limestone and other products, with an economic contribution to New Zealand estimated at \$2.8 billion.
- 4.2 Accessing, extracting, processing, and transporting aggregate is required for the construction of infrastructure in New Zealand. Aggregates form the foundation of every road and building, either directly or as part of materials such as concrete. Additionally, as catastrophic events in recent years have highlighted, the impacts of climate change, including rising sea levels, will put added pressure on rock supply for sea walls, riverbank protection and restoration, and other climate adaptation solutions.

- 4.3 It is more critical than ever that local aggregate resources are identified throughout the country, protected and effectively managed to build resilient infrastructure and homes. Importing of aggregates and sand into New Zealand is neither cost effective nor practical given logistical constraints such as shipping and port facilities in New Zealand.

5. Conclusion

- 5.1 Infrastructure NZ strongly supports the development of the Critical Minerals list and recommends the additional criteria of economic importance be added. We also strongly support the inclusion of aggregates and sand on the Critical Minerals List.



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