A moratorium on seabed mining

KASM (Kiwis Against Seabed Mining) is calling for a moratorium on all seabed mining in New Zealand waters until we have a clear understanding of the risks and impacts, for the reasons set out below.

The situation

There are currently two advanced proposals for mineral mining in New Zealand waters:

- Trans Tasman Resources Ltd seeks to mine iron ore from a 140sqkm area in the South Taranaki Bight off the coast of Patea/Hawera in a water depth of 20-60 metres.
- Chatham Rock phosphate Ltd seeks to mine phosphate nodules in an area covering over 450sqkm on the Chatham Rise east of Canterbury in a water depth of 400m.

Given the entire west coast of the North Island - from Wanganui to Cape Reinga - is under either a prospecting or exploration permit for offshore ironsands mining, covering an area of more than 20,000 square kilometres, we are likely to see a surge in applications in other areas if these current proposals gain consent.

Six reasons for a moratorium

1. Insufficient knowledge

Presently there is insufficient knowledge about the marine environments surrounding NZ, certainly not enough to claim authoritative baseline understandings from which to gauge the environmental effects of seabed mining. Management of any natural resource is dependent upon sufficient knowledge about ecosystems.

We don’t know enough about existing marine biology and ecology nor the dynamic systems constantly at play within our marine environments - nor how change in one system will flow onto the next. Nor do we know enough about the technology and the mining methods that will be used, or what their effects will be.

Therefore it is not currently possible to adequately predict the environmental affects of seabed mining.

2. Cumulative effects unknown

The cumulative effects of these proposals have not been adequately researched or understood. For decades, our marine environments have been subject to a number of human-induced environmental stressors from industry, fishing and agriculture.
On top of existing environmental stressors, what effects would wide-scale application of these operations place on various inshore and deep-water locations, fish stocks, our precious coastlines, surf breaks and beaches?

What pollution would, or may, result, and how widespread will its impacts be?

What ongoing effects will sedimentation have on the benthic (seafloor) community and how will those effects flow onto the rest of the food web? What are the existing impacts of climate change and ocean acidification, and how will impacts from ocean acidification and climate change be exacerbated by mining activities?

These are all questions that need to be adequately addressed before any seabed mining applications can be considered.

We make further note that most of the west coast iron sands permit areas directly overlay habitat of the critically endangered Maui’s Dolphin and the South Taranaki Bight is an area of importance to the endangered Blue Whale.

3. Inadequate Regulatory Process

Scientists tell us that we need fully representative networks of marine protected areas to protect against stressors such as ocean acidification, climate change, fishing and pollution. Currently marine reserves can only be established within the territorial sea.

Further out in its EEZ, New Zealand only has ‘benthic protected areas’, which only prevent bottom trawling: these were developed by the fishing industry to address concerns about bottom trawling, but do not come anywhere near fully protecting the marine environment and do not cover a full representation of marine habitats in the EEZ.

In addition, the new Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 falls far short of the state of the art, participatory process that is needed to protect our marine environment. It was pushed ahead by the government to facilitate deep sea drilling, and scant attention has been paid to seabed mining.

The environmental assessment procedures in the EEZ Act are inadequate. A robust environmental assessment procedure would require that full and public environmental impact assessments must be carried out, including environmental assessments, subjected to a public and peer review process, and followed by a public process, with public notification, hearings and a full and fair procedure. However, the EEZ Act does not require publication of assessments nor for public comment and review.

4. NZ needs time and information

We New Zealanders need to be asked for our consent to these proposals. Public consultation has been scant since New Zealand waters were opened up to mining in 2005 with the implementation of the controversial Foreshore and Seabed Act and the subsequent implementation of the new EEZ Act and changes to the Crown Minerals Act.

There are already proposals to weaken the public participation process under the EEZ Act by including a new category of non-notified discretionary activities, where
the public would not even be notified, would not have an opportunity to comment, and there would be no possibilities of appeals.

The Crown has an explicit duty as accorded in Te Tiriti o Waitangi to actively protect Hapu and Maori interests in their lands, coasts and Te Tai-o-Rehua (Tasman sea) to the fullest extent and non notified consents fail to satisfy that requirement. The Crown has an obligation as a Treaty partner to recognise and uphold Maori customs and practices and to act reasonably and with utmost good faith.

All seabed mining activities should be publically notified along with coastal Hapu and Iwi Authorities of the area where the activity takes place, to allow for effective Kaitiakitanga practices of Maori.

We need access to comprehensive information and time to properly assess that information to then consider the long-term implications of the large-scale seabed mining being proposed. Currently much of the information relating to these proposals is not in the public domain.

We need to understand, more fully, the life that exists in our waters before we wreak havoc in and around their habitats. We need to know what stands to be lost before it is put at risk.

5. Questionable economic and social impacts
The economics are highly questionable. The only driving force behind these proposals is money and current proposals deliver very little benefit to New Zealanders and the New Zealand economy, relative to potential private shareholder benefit.

Further, there has never been an environmental economic study to determine the ‘natural capital’ value of the marine areas; therefore economic gain is used only to justify exploitation.

In the case of ironsands, the seabed mining proposals feature predominant foreign corporate ownership and no added value to raw resources onshore. This model limits the contribution of seabed mining to local and national economies in terms of jobs and economic activity. Hence, for economic viability, exporting raw unprocessed iron ore demands higher volumes, creating greater ecological destruction.

What effects might result on other existing industries such as fishing, tourism and exports? NZ’s international trade relies heavily on our clean green image. Tarnish that image and we weaken NZ’s point of difference in the international markets. New Zealand must take a step back, attain a fuller understanding of the environmental implications of seabed mining and realistically assess the economic model being proposed.

6. Seabed mining: still highly experimental and untested
Internationally, the notion of seabed mining is gaining momentum. Given that seabed mining is experimental, untested, unproven and under-researched, posing very real potential to devastate valuable and valued marine environments, considering also where New Zealand positions itself in the international community and the global economy it would be irresponsible and reckless to dive headlong into
using this novel technology based on very optimistic assumptions about its overall economic impact.

At this time New Zealand is better off not muddying the waters of our oceans and our trade advantage, rather opting to really do our homework while maintaining the ability to observe how this plays out elsewhere.

**Notes**

The **vast scale** of proposed seafloor mining operations is staggering. Exploration permits cover vast oceanic areas in the tens of thousands of square kilometres running continuously from Whanganui to Cape Reinga plus much of the west coast of the South Island and other highly unique and valuable large areas on the Chatham Rise and in the Kermadec Trench.

Proposed volumes of material displacement are in the tens of millions of tonnes per annum, per operation.

Seafloor mining can only be described as a **destructive process**, leaving mined areas as dead zones with no guarantee of recovery and potential for severe damage to surrounding areas from widespread sedimentation and pollution.

In this age, environmentally destructive economic ventures are not acceptable when there are viable, safe alternatives to meet human needs, e.g. bolstered recycling legislation and urban mining.

**KASM (Kiwis Against Seafloor Mining)** is a grassroots community action group who strongly oppose any non-essential seabed mining. Our objectives are to raise public awareness of seabed mining proposals in New Zealand waters, inform and educate as to the consequences of these proposals and protect and preserve our marine environments for future generations to enjoy. KASM is a non-political, non-profit organization funded by membership subscriptions and donations. KASM was formed in May 2005.

**Supported by the following organisations:**

![Eco](image1.png)  ![Forest & Bird](image2.png)  ![Greenpeace](image3.png)  ![Sea Shepherd](image4.png)  ![Surfbreak Protection Society](image5.png)