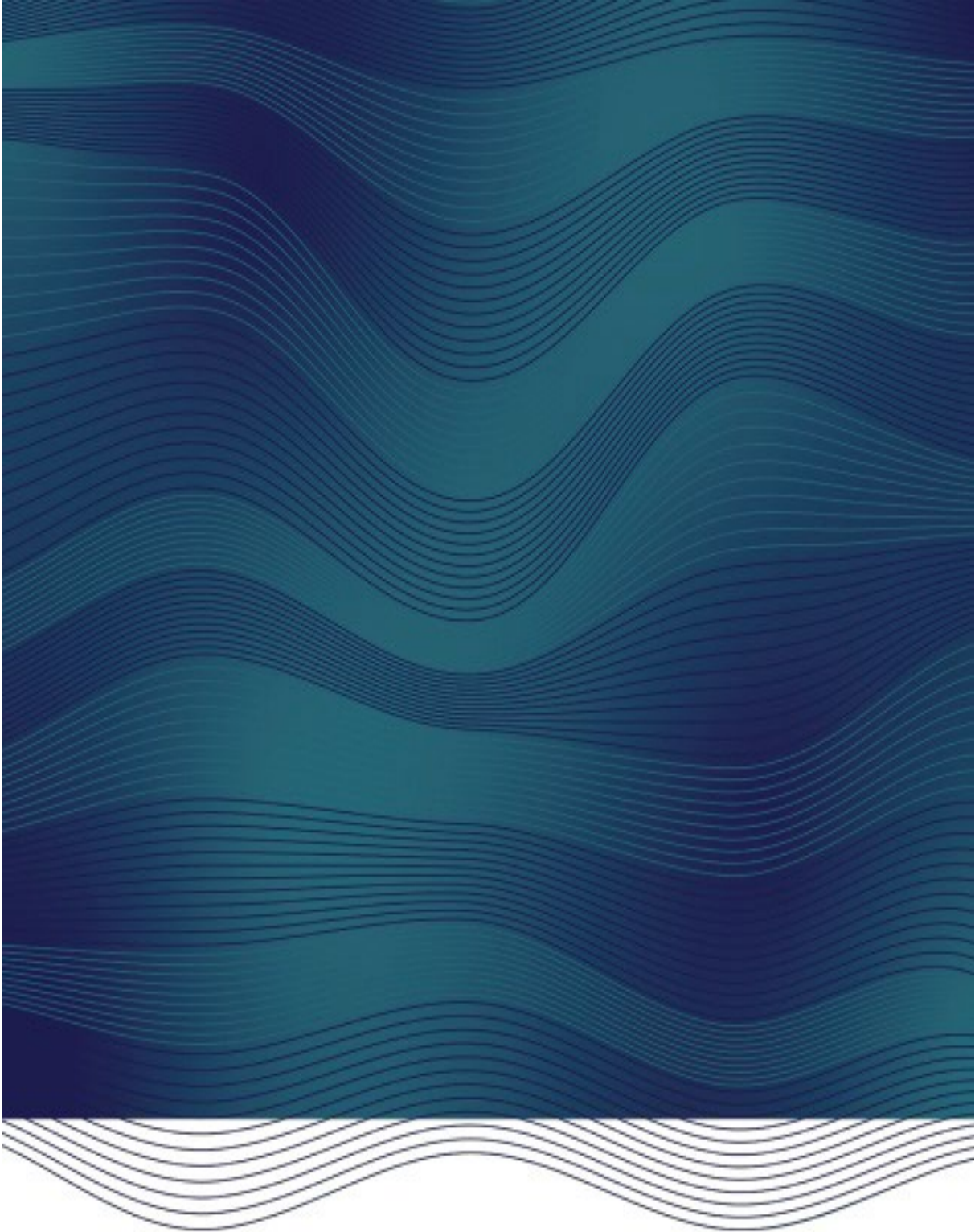


# Consultation submission form

Proposed fees for new Tier 3 mining permit

December 2024



## How to submit using this form

This form is used to provide feedback to the Ministry of Business, Innovation and Employment (MBIE) on the proposed fees for a new Tier 3 mining permit.

When completing your feedback on this submission form, please provide comments, examples and reasons/evidence explaining your answer. Your feedback provides valuable information and informs decisions about the development of the fees.

You can submit this form anytime before 5.00pm, Friday **7 February** 2025 by:

- Emailing it to [resourcesfeedback@mbie.govt.nz](mailto:resourcesfeedback@mbie.govt.nz) with the subject line 'Proposed fees for Tier 3 mining permit'

Your feedback will be used to inform advice to the Minister for Resources, leading to a proposal to Cabinet for changes to fee regulations. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If a request is received, there is no guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

## Submitter information

MBIE would appreciate you providing some information about yourself. If you choose to provide information in the “About you” section below it will be used to help us understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

### A. About you

Name: Patrick Phelps

Email address: patrick@mineralswestcoast.org.nz

### B. Are you happy for MBIE to contact you if we have questions about your submission?

Yes

No

### C. Are you making this submission on behalf of a business or organisation?

Yes

No

If yes, please tell us the title of your company/organisation:

**Minerals West Coast**

### D. The best way to describe your role is:

Academic/researcher/research institute

Community group (please specify below)

Consultant (please specify below)

Tradesperson (please specify below)

Industry group (please specify below)

Industry participant (please specify below)

Independent expert (please specify below)

Business owner (please specify below)

Environmental NGO (please specify below)

Student (please specify below)

Other (please specify below)

Prefer not to say

Please specify here:

**Minerals West Coast, the voice for the minerals industry on the West Coast of the South Island, and throughout New Zealand. Our membership includes gold and coal miners from small to large scale, from black sanders and suction dredge operators to New Zealand’s largest mining companies.**

**E. Privacy information**

- The Privacy Act 2020 applies to submissions. Please check the box if you do not wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions, or a summary of submissions, received to MBIE's website at [www.mbie.govt.nz](http://www.mbie.govt.nz). If you do not want your submission or a summary of your submission to be placed on our website, please check the box and type an explanation below:

***N/A – I have no issue with this submission being uploaded.***

**F. Confidential information**

- I would like my submission (or identifiable parts of my submission) to be kept confidential and have stated my reasons and ground under section 9 of the Official Information Act 1982 that I believe apply, for consideration by MBIE.

If you have checked this box, please tell us what parts of your submission are to be kept confidential.

## Questions for the consultation

1. What is your view on the proposed application fee for a new Tier 3 permit of \$2,420 + GST? If you do not support it, what alternative methodology or rate would you suggest?

The methodology seems appropriate - except for charging the Tier 3 permit applicant for team meetings and staff training, which are an MBIE corporate function and a public good, and for iwi consultation, which arises from the Crown's obligations under the principles of the Treaty of Waitangi, and should, therefore, be a Crown expenditure on behalf of all New Zealanders.

As well, we have consulted within our membership who find that the proposed charges in relation to Tier 3 permits look to have been overestimated, according to their calculations.

Minerals West Coast proposes that consideration be given to reducing the Tier 3 permit application fee, accordingly. Methodology provided by Minerals West Coast membership would suggest the following as appropriate:

- Assessing and processing - 3 hours @ \$60/hour.
- IWI Consultation – 1 hour @ \$60/hour.
- Administration - \$100.

In total, therefore, **\$340.00**.

2. What is your view on the proposed adjusted fee for applications to change the duration or land area of a Tier 3 permit of \$1,452 + GST? If you do not support this fee, what alternative methodology or rate would you suggest?

In agreeing with our answer to Q1, the proposed dollar figure here would also reduce to \$340.00.

3. What is your view on the proposed adjusted fee for applications to change the interest, operator or control of a Tier 3 permit of \$1,065 + GST? If you do not support this fee, what alternative methodology or rate would you suggest?

As above, but on the basis of advice Minerals West Coast has received from members, \$280.00 would be an appropriate figure.

4. What is your view on the proposed annual fee for a Tier 3 permit of \$1,000 + GST? If you do not support it, what alternative methodology or rate would you suggest?

Supported. This is reasonable. Minerals West Coast is curious to understand what these fees support or fund, noting the variance is minimal – the cost will be the same for Tier 2 and Tier 3, and even Tier 1 is \$1,400 – not much greater than a hobby permit annual fee.

## Thank you

Thank you for your feedback. MBIE really appreciates your insight on the proposed fees for a new Tier 3 mining permit.