

To whomever it may concern,

Thank you for this opportunity to submit on Activity Classifications under the EEZ Act.

The Blueskin Resilient Communities Trust (BRCT) is a registered charitable trust formed in 2008 out of the need to support local sustainability and transition initiatives in a planned and structured way. Our core activity is supporting the development of a resilient energy system in Blueskin Bay and we provide services for individuals and groups in Blueskin and Dunedin. Jeanette Fitzsimons is our patron.

We wish to acknowledge the strategic value of public policy and want to encourage public participation in the development of policy.

BRCT submission on:

Ministry for the Environment. 2013. Activity classifications under the EEZ Act: A discussion document on the regulation of exploratory drilling, discharges of harmful substances and dumping of waste in the Exclusive Economic Zone and continental shelf. Wellington: Ministry for the Environment

This submission addresses Question 1 and its supplementary questions from the discussion document:

Do you agree with the proposal that exploratory drilling for oil and gas be classified as non-notified discretionary?

BRCT does not agree with the proposal for exploratory drilling for oil and gas to be classified as non-notified discretionary.

If not, how should the activity be classified or regulated?

The activity should either remain as discretionary or all exploratory energy activities, including wind power, hydro power and so on should be classified as non-notified.

Are there any issues that you think have not been considered?

The aim of this new classification is "to cut consenting costs and timeframes for applicants" in order to "increase investor certainty in the timeframes and process" while "maintaining appropriate regulatory oversight of the impacts of these activities on the environment and existing interests". However, a key issue which we believe must be considered is parity with consenting costs and timeframes for the exploration of alternative energy options on-shore.

For example, BRCT requires a resource consent in order to develop a small community-owned land-based wind farm (3-4 wind-turbines) and has already been required to secure a resource consent for exploratory wind testing. Furthermore, notified consent will likely be required in order for us to develop this site and explore the potential for small-scale community-owned power generation. The investment required to secure this resource consent is significant for us as a community-based, grant-funded organisation. On the other hand the potential benefits to our local community and to similar communities around NZ, if we can make community-owned power generation a reality, are considerable. These include contributing to local economies, job creation and building community resilience.

Oil and gas exploration could have a significant impact on the environment and the interests of the local community. For this industry to have special dispensation in terms of compliance costs and time-frames which is not afforded to clean, green, locally supported initiatives is inequitable. We urge the Government to consider this issue and bring the consent requirements for all exploratory energy projects into alignment.

Finally, the proposal for exploratory drilling for oil and gas to be classified as non-notified discretionary appears to conflict with other Government targets, most importantly the reduction in carbon emissions target which is a long-term target of a 50% reduction in New Zealand greenhouse gases emissions from 1990 levels by 2050.