

File ref: EEZ100019

8 June 2020

Mr Ray Smith
Director-General for Primary Industries
Ministry for Primary Industries
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By email to: Roger.Smith@mpi.govt.nz; John.Sanson@mpi.govt.nz; and Dan.Kluza@mpi.govt.nz

Dear Mr Smith

Request for advice under section 56 of the EEZ Act regarding a notified marine discharge consent application by Beach Energy Resources NZ (Holdings) Ltd – EEZ100019 (Canterbury Basin)

The application

On 25 March 2020, Beach Energy Resources NZ (Holdings) Limited (Beach Energy) lodged an application for marine discharge consent with the EPA. Beach is applying to discharge trace amounts of harmful substances from the deck drains of a Mobile Offshore Drilling Unit (MODU) as offshore processing drainage (OPD). The MODU will be used to drill exploration and appraisal wells in the Canterbury Basin within Beach Energy's Petroleum Exploration Permit area (PEP38264), although the notified application relates only to the discharge of trace amounts of harmful substances from the deck drains of any MODU used.

The OPD discharge requires public notification under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 Act (EEZ Act). The EPA notified the application on 22 May 2020 and the submission period closes on Monday 6 July 2020. If any parties request to be heard, a public hearing will be held within 40 working days of this date. A decision on the application will be made by an EPA-appointed Decision-Making Committee (DMC).

Further information about this notified application can be viewed at <https://www.epa.govt.nz/public-consultations/open-consultations/beach-energy-marine-discharge-consent-application/>.

Beach Energy will need additional EEZ Act consents for any exploration or appraisal drilling to go ahead in the Canterbury Basin. These consents will be considered by a further DMC but, as the EEZ Act regulations classify exploration drilling as a non-notified process, a submission process does not take place for these applications.

Request for advice and information

The DMC requests the following advice and information from Biosecurity New Zealand, Ministry for Primary Industries (MPI) under section 56 of the EEZ Act so we may better understand the risk, scale, and significance of the potential spread of invasive species due to the activities described in the [Impact Assessment](#) of Beach Energy's application:

1. Please describe Biosecurity New Zealand's responsibilities in relation to the operation of any MODU operated by Beach Energy in the Canterbury Basin.

2. Beach Energy considers the Biosecurity Act 1993 does not provide measures to avoid, remedy, or mitigate effects in relation to its current application to discharge harmful substances from the deck drains of the MODU it operates (page 31, section 2.45).
 - a. Please provide information on any standards that relate to biosecurity that any MODU must meet.
 - b. Please comment on any measures you consider are reasonably necessary to avoid, remedy, or mitigate the effects of a biosecurity incursion.
3. In relation to your responsibilities under a marine management regime (as defined in section 7 of the EEZ Act), please provide comment on any other matter you consider may assist the DMC in determining the applications under section 59 and 61 of the EEZ Act.

Please provide this information to the EPA by **Friday 26 June 2020**. The information will be provided to the applicant as soon as it is received.

If you have any questions or further queries please don't hesitate to contact the Project Leader, Jillian Kennemore on +64 27 641 7250 or via email at Jillian.Kennemore@epa.govt.nz.

Yours sincerely



Sandra Balcombe
Acting Manager
Land & Oceans Applications

Cc:

Roger Smith, Deputy Director-General Biosecurity New Zealand;

John Sanson, Manager Recovery and Pest Management Biosecurity New Zealand; and

Dan Kluza, Principal Adviser, Animals and Aquatic, Biosecurity New Zealand.