

File ref: EEZ100019

8 June 2020

Mr Ray Smith
Director-General
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand

Private Bag 63002
Wellington 6140, New Zealand

Level 10, Grant Thornton House
215 Lambton Quay
Wellington 6011, New Zealand

epa.govt.nz
+64 4 916 2426

By email to: Blake.Abernethy@mpi.govt.nz; Emma.Taylor@mpi.govt.nz; and Dee.Wallace@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 (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 Fisheries New Zealand, Ministry of Primary Industries (MPI) under section 56 of the EEZ Act to help it understand the application and the significance of any potential effects:

1. Please confirm Beach Energy's presentation of fishing events in the areas of interest between 2014 and 2019, as detailed in Table 16 (page 93 of its [Impact Assessment](#)), is accurate.

2. Please comment on whether you agree with Beach Energy's assessment that the effects on commercial fishing interests will be negligible (section 7.3.6.2 of the [Impact Assessment](#)).
3. Please specify any measures you consider are reasonably necessary to avoid, remedy, or mitigate any adverse effects of the proposed activities on commercial fishers.

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 and Oceans Applications

Cc: Emma Taylor, Acting Director Fisheries Management

Blake Abernethy, Team Manager, Spatial Planning & Allocations Fisheries New Zealand, and
Dee Wallace, Senior Analyst, Spatial Planning and Allocations Fisheries New Zealand.