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OMV submission on proposal to amend the Fire Fighting Chemicals Group Standard 2017

1. This submission is made by OMV New Zealand Limited, together with its subsidiaries (together **OMV**).

2. OMV is New Zealand's largest producer of gas and liquid hydrocarbons, and operator of the Maari, Māui and Pohokura offshore fields, operator of several current offshore exploration permits, operator of the Maui and Pohokura production stations, operator of the Omata and Paritutu tanks farms and associated pipelines and infrastructure.

3. OMV is making this submission because all of the facilities we own and operate have fire fighting chemicals that will be affected by the changes proposed to the Fire Fighting Chemicals Group Standard 2017.

4. We do not wish to speak at a hearing

5. OMV's preferred outcome of the consultation is for the proposed amendment to go ahead with changes that would ensure affected owners and operators are able to effectively and efficiently phase out the use of PFAS containing fire fighting foams.

Fluorine-free foams

6. OMV's FPSO Raroa is an internationally flagged vessel. IMO requirements have strict limits on the fire fighting foams that can be installed. OMV is concerned there will be a lack of options of IMO compliant foam available during and after the phase-out of any fluorinated foams. A lack of options may result in higher costs due to lack of competition, in both the foam products and the infrastructure to deliver them.

7. We note that fluorine-free foams are still developing. There are limited proven effective fluorine free foams currently available. We also note the move to fluorine-free foams in some instances may also require infrastructure changes to ensure systems work effectively. These changes will take time to assess and implement.

Testing of foam systems

8. Periodic testing of foam systems is a requirement for ensuring safety systems will work when needed. For example, Civil Aviation standards for offshore helicopter landing areas (CAP437) stipulates that all parts of the foam production system, including the finished foam, should be tested by a competent person on commissioning and annually thereafter. For fixed offshore installations, it may not be possible to contain all foam wastes due to the exposed nature of the surfaces, including decks and helidecks.

Cleaning of foam systems on vessels and offshore installations

9. Most foam systems on vessels and offshore installations are fixed systems.

10. The risks posed by cleaning fixed foam systems *insitu* on offshore installations, including the substances required for cleaning, and the logistics required to ship volumes of waste liquids, may lead to operators being required to replace infrastructure.

11. Proposal 3 would allow the use of firefighting foam products that contain PFAS compounds that are already installed in systems where their use cannot be fully contained for a period of two years from the date the revised Group Standard is enacted. Two years would not be sufficient time to remove and replace infrastructure on all vessels and offshore installations in New Zealand.

Cleaning of foam systems at onshore hydrocarbon locations

12. Most foam systems at tank farms and onshore hydrocarbon locations are fixed systems.

13. Health and Safety requirements for tank farms and onshore hydrocarbon locations require fire fighting equipment and facilities to be available for the identified credible major accident scenarios. Fire fighting systems are designated as safety critical elements and require verification of continued suitability for use through function testing. This requirement would mean in many cases it would not be practical to clean fixed foam systems, leading to operators required to replace or significantly modify infrastructure.

14. Cleaning, modifying or replacing fixed infrastructure will require operations to be shut down. The cost to operators to shut down will be significant, and may have flow on effects to customers, including risk of disruption to essential services.

Coordination for disposing of foams, foam wastes and foam systems

15. There are no facilities available in New Zealand for disposing of these substances. The volumes of foams, foam wastes and foam systems would likely be significant given the number of tank farms, ports, airports and petroleum retailers and operators in the country, combined with the short timeframe proposed for phase out.

16. A nationally coordinated approach would be preferred, to ensure costs and resources are spent effectively and efficiently, with reduced risk of disruption to customers and essential services.

Phasing out of C6 AFFF

17. C6 foams were installed in several of OMV's facilities in the last 18 months, on the understanding these met current environmental standards and were not at imminent risk of being phased out in New Zealand. These foams are proven effective and meet the requirements of the certifiers. We understand the shelf-life of these foams are approximately 10 years from date of installation.

18. OMV supports Option 2 for the phase out of C6 foams, and would prefer to be able to progressively change out C6 foams as they approach the end of their shelf life.