

27 May 2019

Environmental Protection Authority
Attached to online submission form

OMV GSB Limited
By email to f.nz.submissions@omv.com

OMV GSB Limited marine discharge consent application

1. This is a submission by the Major Electricity Users' Group (MEUG) on the consultation by the Environmental Protection Authority (EPA) on the application by OMV GSB Limited for a marine discharge consent.¹
2. MEUG members have been consulted in the preparation of this submission. This submission is not confidential. Some members may make separate submissions
3. MEUG recommends the Decision-Making Committee, to be appointed by the EPA, grants the consent because:
 - a) Given the high-quality application and robust review by advisors to the EPA, we agree with the assessment in the EPA Key Issues Report published 13th May 2019 that the 2-key issues are uncertainty on the Mobile Offshore Drilling Unit (MODU) to be deployed and volumes of harmful discharges that occur. MEUG agrees with the conclusions in paragraphs 57, 58 and 62 of the Key Issues Report on those 2-issues.
 - b) MEUG has an interest in the economic consequences of broader energy policy of which future gas supplies for existing and prospective new gas-fired power stations is critical, in our view, in transitioning the world including New Zealand on a least cost path to a low carbon future. MEUG agrees:
 - With the finding of the Key Issue report that the economic benefit to New Zealand of allowing the application, one of many factors the EPA must consider, is not a key-issue for this consent application.
 - With the analysis of economic benefits in the OMV Impact Assessment report (p125) referring to the overall Exploration and Development (EAD) programme:

“This Discharge Consent application is for a minor component of the total activities related to the GSB EAD Programme proposed by OMV. There will be no economic benefit with regards to the discharge of trace amounts of harmful substances from the deck drains of a MODU.

¹ <https://www.epa.govt.nz/public-consultations/open-consultations/omv-gsb-limited/>

However, the overarching GSB EAD Programme may provide substantial economic benefits to New Zealand if drilling results in a hydrocarbon discovery and future development. This will be assessed in subsequent Marine Consent applications related to the GSB EAD Programme.”

4. MEUG does not wish to be heard at hearings by the EPA on this application.

Yours sincerely



Ralph Matthes
Executive Director