

**ENVIRONMENTAL MANAGEMENT OF
PETROLEUM AND MINERAL
MINING ACTIVITIES BEYOND
THE 12-MILE LIMIT**

Office of the
PARLIAMENTARY COMMISSIONER FOR THE ENVIRONMENT
Te Kaitiaki Taiao a Te Whare Pāremata

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1. INTRODUCTION

At the invitation of the Minister for the Environment and with the support of the regulatory authorities involved, this Office has recently been involved in coordinating consultation for the environmental impact assessment (EIA) of the Floating Production, Storage and Offloading Facility (FPSO) for the Maui oil and gas field. This arrangement continues the Commissioner's agreement to accept some responsibility for proposals subject to the Environmental Protection and Enhancement Procedures (EP&EP, Ministry for the Environment, 1987).

In his letter to the Parliamentary Commissioner for the Environment of 18 October 1994 inviting her to oversee the consultation with various agencies about the FPSO, the Minister for the Environment commented that "the [FPSO] proposal does highlight a lack of coordination in legislation and procedures for environmental management outside the 12-mile limit".

A request was also received, from Te Putahitanga O Taranaki, a standing committee of the Taranaki Regional Council, which wished to "... take a leadership role, through negotiation and consultation, in the consideration of the placement of structures ... as may be developed outside the 12 nautical mile limit of territorial waters".

Those agencies which were asked to comment on the Shell Todd Oil Services' EIA for the FPSO were also asked by the Parliamentary Commissioner for the Environment for their views on the Minister for the Environment's concerns. These are summarised in chapter 3.

An added impetus to following up these concerns was New Zealand's ratification of the United Nations Convention on the Law of the Sea earlier this year (see 2.5). Under the Convention New Zealand could gain exclusive rights to explore and exploit mineral resources of the continental shelf beyond the Exclusive Economic Zone (EEZ). The current seabed survey being carried out to define the continental shelf will produce information which will benefit oil and gas exploration. New Zealand must ensure that satisfactory environmental management procedures are in place to cope with any increase in development of this region.

The purpose of this report is to:

- follow up on the Minister for the Environment's expressed concerns about the lack of coordination in legislation and

1.1 Background

1.2 Purpose of Report

procedures for environmental management beyond the 12-mile limit;

- outline the current legal and policy framework for environmental management beyond the 12-mile limit and compare it with that inside the 12-mile limit;
- identify requirements for effective environmental management of petroleum and mineral mining activities beyond the 12-mile limit;
- identify some of the actual or potential constraints on the current system for environmental management of petroleum and mineral mining activities beyond the 12-mile limit;
- suggest possible strategies to meet requirements for effective environmental management and to resolve perceived inconsistencies in marine environmental management inside and beyond the 12-mile limit;
- identify those issues which require action.

This investigation has been conducted under s 16(1)(a) of the Environment Act 1986 under which the Commissioner may review the system of agencies and processes established by the Government to manage the allocation, use and preservation of natural and physical resources. The results of this investigation will be reported to the House of Representatives and to such other bodies or persons as the Commissioner considers appropriate.

2. LEGISLATIVE AND POLICY FRAMEWORK

It is acknowledged that the regime for protection of the marine environment beyond the 12-mile limit is still in a transitional phase. Key parts of the Maritime Transport Act 1994 are not yet in force, marine protection rules are now being finalised and until these come into effect the Marine Pollution Act 1974 will govern activities such as dumping and incineration.

Tables 1 and 2 summarise and compare the agencies and their environmental management responsibilities inside and beyond the 12-mile limit.

The Maritime Safety Authority (MSA) has responsibility via the Maritime Transport Act 1994 for the protection of the marine environment *beyond* the 12-mile limit, extending to the 200-mile limit or the outer continental shelf - whichever is the further - and this will be implemented by marine protection rules. The Resource Management Act 1991 determines protection of the marine environment *inside* the 12-mile limit.

2.1 Maritime Transport Act 1994

The focus of the Maritime Transport Act 1994 is on the areas of:

- (a) prevention of pollution from ships;
- (b) marine oil spill planning and response; and
- (c) marine dumping and incineration of waste.

The framework of controls which the MSA is responsible for implementing is largely derived from international maritime conventions to which New Zealand is a party and therefore obliged to adhere to the standards and procedures contemplated by those instruments.

Section 387 of the Maritime Transport Act 1994 provides rules which require New Zealand and foreign ships, offshore installations, pipelines, and oil transfer sites, amongst others, to hold a marine protection document. Marine protection documents are issued in respect of such matters as the condition of a ship or installation, and the qualifications of the people involved. A permit issued by the MSA under s 262 for deliberate disposal [dumping or incineration] of waste or other matter is also a marine protection document. [Section 262 will not be in force until the appropriate marine protection rule is in place - refer 2.2.]

TABLE 1: AGENCIES WITH STATUTORY RESPONSIBILITIES INSIDE AND BEYOND THE 12-MILE LIMIT

Agency	Legislation inside 12-mile limit	Legislation beyond 12-mile limit	Responsibility
Ministry for the Environment	RMA	-	Management of environmental effects
Maritime Safety Authority	MPA	MTA	Implementation of marine protection rules; approval of dumping permits
Ministry of Transport	-	CMA via s4 CSA	Regulation of access for exploration and exploitation of mineral and petroleum resources (no environmental concerns)
Minister of Energy (serviced by the Ministry of Commerce)	CMA	CMA, s5 CSA	Authorisation of prospecting, exploration and mining for mineral and petroleum resources (no environmental concerns)
Ministry of Foreign Affairs and Trade	-	CSA	Approval of installations on continental shelf
Ministry of Agriculture	BioA	-	Management of unwanted organisms
Department of Conservation	ConA, MMPA	MMPA, Fish A	Management of marine mammals; management of fishing-related mortality of protected species
Ministry of Fisheries	TSEEZA, FishA	TSEEZA, FishA	Management of EEZ & management of fisheries

BioA: Biosecurity Act 1993
 CMA: Crown Minerals Act 1991
 FishA: Fisheries Act 1983
 MTA: Maritime Transport Act 1994
 MPA: Marine Pollution Act 1974 (being progressively repealed as parts of MTA are brought into force)
 TSEEZA: Territorial Sea, Contiguous Zone, and Exclusive Economic Zone Act 1977
 ConA: Conservation Act 1987
 CSA: Continental Shelf Act 1964
 MMPA: Marine Mammals Protection Act 1978
 RMA: Resource Management Act 1991

TABLE 2: STATUTORY FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT INSIDE AND BEYOND THE 12-MILE LIMIT

	Inside 12 nautical mile limit	Beyond 12 nautical mile limit
Lead agency	Regional councils	No lead agency
Other agencies with responsibilities	MFE, MAF, DOC, MFish, MOC, MSA	MSA, MOT, MOC, MFAT, MAF, DOC, MFish
Purpose of legislative control	Sustainable management of resources (RMA); advocacy of resource conservation (Con A); management of crown-owned minerals and petroleum (CMA); management of unwanted organisms (BioA)	Marine environment protection (MTA); provision for exploitation of continental shelf (CSA); management of Crown-owned minerals and petroleum (CMA); EEZ resource exploitation & management (TSEEZA)
Outcome of legislative control	Marine mammal management (MMPA); utilisation of fisheries resources while ensuring sustainability and management of fishing-related mortality of protected species (FishA); approval of dumping permits (MPA)	
Treaty of Waitangi obligations	Manages environmental effects of activities	In general manages activities rather than environmental effects
Procedures:	Principles must be taken into account	No obligations under MTA or CSA
• Public and Iwi participation	RMA provides for consultation	No further consultation after rules promulgated
• Accountability	Accountable to ratepayers	Accountable to taxpayers
• Environmental assessment	AEE required under RMA	No requirement to assess environmental effects or impacts but must comply with marine protection rules
• Monitoring	Can be made condition of resource consent granted by regional council (RMA); MAF have power to inspect any craft (BioA)	Inspections and audits may be carried out by MSA (MTA); effect of petroleum permits may be monitored by MOC (CMA); foreign fishing craft may be inspected at any time (TSEEZA); power to search and seize (MMPA); observer may be placed on any vessel (FishA)
• Enforcement provisions	Enforcement orders or abatement notices may be served and imprisonment or fines imposed (RMA); cost of cleaning up pollution and damages may be recovered by marine agency (MTA); prevention of spread of unwanted organism may be enforced by destroying organisms, fines or imprisonment (BioA)	Marine protection document may be suspended or revoked, cost of cleaning up may be recovered by marine agency, and fines, imprisonment and detention of property (MTA); fined if mining of minerals not in accordance with licence (CSA); revocation of mining permit (CMA); fishing licence may be suspended or cancelled if conditions not met (TSEEZA)
	Fine may be imposed (MMPA); imprisonment or fine may be imposed (FishA)	

BioA: Biosecurity Act 1993
 ConA: Conservation Act 1987
 FishA: Fisheries Act 1996 (not yet in force)
 MTA: Maritime Transport Act 1994
 MPA: Marine Pollution Act 1974 (being progressively repealed as parts of MTA are brought into force)
 TSEEZA: Territorial Sea, Contiguous Zone, and Exclusive Economic Zone Act 1977

CMA: Crown Minerals Act 1991
 CSA: Continental Shelf Act 1964
 MMPA: Marine Mammals Protection Act 1978
 RMA: Resource Management Act 1991

2.2 MARPOL 1974

Marine protection rules for some purposes (eg for oil discharges) are a prerequisite to a country's ratification of The International Convention for the Prevention of Pollution from Ships 1974 (MARPOL) as modified by the Protocol of 1978. New Zealand, almost alone among industrialised nations, is not yet party to the MARPOL convention. Thus this ratification has some urgency.

Marine protection rules, containing the detailed technical standards for protection of the marine environment, are being developed by the MSA on behalf of the Minister of Transport. Putting in place the necessary marine protection rules to enable the ratification and implementation of MARPOL is not expected to be completed until February/March 1997.

The following Resource Management Act 1991 regulations being drafted by the Ministry for the Environment (MFE) for *inside* the 12-mile limit are intended to be in force by February/March 1997, at the same time as the related marine protection rules:

Regulations in respect of the discharge of the following harmful substances:

- oil;
- noxious liquid substances;
- garbage;
- ballast water; and
- cooling water and other uncontaminated water from normal ship operations.

The following are also included:

- dumping of dredged material and other wastes; and
- the incineration of wastes and other matter.

Regulations under the Resource Management Act 1991 to control the discharge of sewage from ships within the 12-mile limit are not timed to come into effect until 1 December 1997. The Ministry of Transport (MOT) is working to the same timetable to bring into force rules under the Maritime Transport Act 1994 governing sewage and garbage outside the 12-mile limit.

2.3 The London Convention 1972

The London Convention is the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972. Dumping is the deliberate disposal of waste carried onboard for the purpose of disposal. New Zealand implemented the London Convention in the Marine Pollution Act 1974. The latter Act will be repealed when the marine protection rules come into effect.

Section 4 of the Continental Shelf Act 1964 extends the application of the Crown Minerals Act 1991, as it applies to petroleum, to the continental shelf. By virtue of s 4 of the Continental Shelf Act and the Crown Minerals Act, the Minister of Transport is responsible for granting access to the continental shelf beyond the 12-mile limit.

The Minister of Energy, services by the Ministry of Commerce, is responsible under s 5 of the Continental Shelf Act and the Crown Minerals Act for authorising prospecting, exploration and mining for minerals and petroleum on the continental shelf.

The Ministry of Foreign Affairs and Trade (MFAT) administers the Continental Shelf Act and has responsibilities via regulations under the Continental Shelf Act 1964 to regulate or prohibit the construction, erection or use of installations or devices in, on, or above the continental shelf in connection with the exploration of the shelf or the exploitation of its natural resources. It does not appear to have made any such regulations, although it has made regulations prescribing safety zones around the Maui A, Maui B and FPSO off-shore installations on the advice of the applicant and MSA.

The United Nations Convention on the Law of the Sea (UNCLOS) was ratified by New Zealand in July 1996. Under the Convention, signatory countries can obtain exclusive rights to explore and exploit mineral resources of the sea-bed and sub-soil, by claiming a legal continental shelf beyond the EEZ. Unlike the EEZ, the legal continental shelf claim does not provide rights to fisheries resources. This convention requires, inter alia, New Zealand to define the outer limits of its continental shelf and submit its claim by 2006.

New Zealand and Australia have now begun a joint marine survey to obtain scientific data to assist each country to claim a legal continental shelf beyond the EEZ. The Ministry of Commerce (MOC) has acknowledged that information obtained during the survey work on the nature and thickness of seabed sediment, and on the geology beneath the seabed, will also benefit future oil and gas exploration.

The Ministry of Agriculture (MAF) has the responsibility under the Biosecurity Act 1993 to manage the potential risk of importation of foreign organisms in ballast water. There is a risk of harmful organisms being introduced to the New Zealand marine environment if ships discharge ballast water that has been taken on in a foreign port. To reduce this risk, the Ministry also administers the Voluntary Controls on the Discharge of Overseas Ballast Water within New Zealand. The latter are guidelines which cover all ships entering New Zealand's territorial sea and request that if ballast water needs to be

2.4 Continental Shelf Act 1964

2.5 UNCLOS

2.6 Biosecurity Act 1993

discharged then it is exchanged at sea before vessels enter or after they leave New Zealand territorial waters.

2.7 Marine Mammals Protection Act 1978

The Department of Conservation (DOC) has responsibilities under the Marine Mammals Protection Act 1978 for protection, conservation and management of marine mammals within New Zealand's EEZ.

2.8 EP&EP

The Environmental Protection and Enhancement Procedures 1987 (EP&EP) state that the process of environmental impact assessment and, where appropriate, environmental impact reporting is to be applied to the granting by the Crown of all licences, authorisations, permits and privileges which may have environmental implications and which are issued pursuant to a list of Acts, or such other Acts as may be agreed between the Minister for the Environment and the Minister responsible for the legislation in question. The environmental assessment process is also to be applied to the provisions included in proposed legislation affecting the environment (s 2 of EP&EP).

However, the approach taken by the Crown during the Resource Management Law Reform process which led to the Crown Minerals Act 1991 and the Resource Management Act 1991 was to separate mineral allocation and pricing decisions from the management of the wider environmental effects. This approach was taken in order to reduce potential departmental conflicts of interest and allow for clearer decision making. These same policy principles apply equally outside the 12-mile limit.

On 26 September 1995, the Minister for the Environment confirmed in a letter to the Parliamentary Commissioner for the Environment that the Environmental Protection and Enhancement Procedures 1987 still apply.

While the EP&EP identify the need for consultation with individuals and agencies for their expert views and advice or opinions, there is no requirement for public submission or scrutiny of an environmental assessment except when an Environmental Impact Report is audited by the Parliamentary Commissioner for the Environment.

Currently the application of the EP&EP beyond the 12-mile limit has been restricted to the Maui field developments. Environmental assessment was a requirement agreed in the White Paper on the Development of the Maui Gas Field October 1973.

3. AGENCY VIEWS

Agencies asked for comment on the Shell Todd Oil Services' EIA for their FPSO were also asked by the Parliamentary Commissioner for the Environment for their views on the Minister for the Environment's expressed concern (refer 1.1) about the lack of coordination in legislation and procedures for environmental management outside the 12-mile limit.

Environmental issues are now outside the parameters of the Energy and Resources Group. However in the past licensees have commonly requested information from the group on consent processes for environmental management.

It was observed that to an outsider coming to New Zealand to explore for hydrocarbons offshore, it is bizarre that different procedures for providing information, assessing the environmental effects, granting consents and monitoring those consents is generated from a 'magic line' called the 12-mile limit. The procedures are claimed to be confusing, overly complicated and are continually changing.

The Ministry believes it would be useful if an information document setting out relevant information for explorers and developers were prepared and agrees that there are benefits in clarifying the procedures for environmental management beyond the 12-mile limit.

The Ministry carried out some initial scoping on the possible application of environmental assessment procedures to activities outside the 12-mile limit but this is not being pursued currently.

The Department of Conservation agrees with the Minister for Environment that there is a lack of coordination in legislation and lack of procedures for environmental protection beyond the 12-mile limit. The Department would support legislation which set down mandatory procedures to protect the marine and seabed environment outside the 12-mile limit.

The Department suggests an inter-agency meeting would be useful and notes that:

- at present there is almost no use, development or occupation outside the 12-mile limit;
- any use or undertaking is likely to be substantial;

3.1 Energy and Resources Division, Ministry of Commerce

3.2 Ministry for the Environment

3.3 Department of Conservation

- devolution to local authorities is not appropriate beyond the territorial sea; and
- the Ministers of Conservation and Environment are the most appropriate candidates for a Crown role.

3.4 Maritime Safety Authority

The MSA, in its dealings to date with the Maui FPSO project, has not experienced any lack of coordination between the parties it has worked with. Extensive discussions and consultations have been held on marine environment protection issues where the MSA has jurisdiction and on maritime safety matters where the Health and Safety in Employment Act takes precedence.

The Authority pointed out that the mere presence of a number of agencies with responsibilities for marine environment protection does not automatically result in lack of consultation or coordination.

3.5 Petroleum Inspectorate, Ministry of Commerce

The Inspectorate presumed that concern about the lack of coordination in legislation and procedures outside the 12-mile limit has arisen with the revocation of the Petroleum Regulations 1978 under which the Petroleum Inspectorate reviewed environmental impact reports for offshore work. These regulations were revoked by the Health and Safety in Employment Act 1992.

3.6 Petroleum Exploration Association of New Zealand

This organisation considered there had been a marked improvement in coordination between agencies. Because marine protection rules are currently being set up for protection of the environment beyond the 12-mile limit under the Maritime Transport Act 1994, the Association's aim is to establish some consistency for rules on either side of the 12-mile limit during the transition.

As a result of the ratification of United Nations Convention on the Law of the Sea in July 1996, New Zealand will be required to delineate the outer limits of its continental shelf by 2006. The Association advised that the required surveying for such a re-definition could cost \$35 million but would increase the area over which New Zealand has statutory authority. This could be seen as an asset to New Zealand because the mining industry pays for access through royalties if minerals are found.

3.7 Ministry of Fisheries

The Ministry considers that any development outside the 12-mile limit should comply with whatever resource consents and environmental standards would be expected of a similar type of operation within the 12-mile limit. The Ministry agrees with the Minister for the Environment that there is clearly a lack of coordination in legislation and procedures for environmental management outside the 12-mile

limit. The Ministry of Fisheries is interested in this area because of its responsibility for ensuring the sustainability of fisheries resources.

The Ministry notes that any reforms made to requirements applying outside the 12-mile limit and within the EEZ would need to be consistent with the requirements of the United Nations Convention on the Law of the Sea which New Zealand ratified in July 1996. Pursuant to this convention, the territorial limits of New Zealand end at the 12-mile line. While the convention allows for the regulation of a range of activities within the EEZ, and provides for New Zealand to exercise sovereign rights over resources in the zone, the jurisdictional regime is different in each case. Accordingly, care would need to be taken to ensure that any reforms respected the different jurisdictional rights within 12 miles and beyond 12 miles in the EEZ.

3.8 Ministry of Foreign Affairs and Trade

This Council suggests that the MSA should take lead responsibility for resource consent matters relating to the development or use of natural and physical resources located outside the 12-mile limit. However the Council stresses that its concern is not so much the agency to be charged with lead responsibility in this regard but rather the entrenchment of a process through which the public may be consulted about developments, the monitoring of developments, and appeal rights with respect to any decision that may be made on developments and accountability.

3.9 Taranaki Regional Council

The Council wants to ensure that the methods in place for the coastal marine area are matched by equal methods outside the 12 nautical mile limit but inside New Zealand's EEZ.

Te Putahitanga o Taranaki is a standing committee of the Taranaki Regional Council. This committee requested ".....a leadership role, through negotiation and consultation, in the consideration of the placement of structures.....as may be developed outside the 12 nautical mile limit of territorial waters".

4. EFFECTIVE ENVIRONMENTAL MANAGEMENT

Key requirements for effective environmental management of petroleum and mineral mining activities beyond the 12-mile limit include the following:

- procedures must be clear to all affected parties;
- coordination between agencies with different legislative responsibilities;
- procedures for assessment of environmental effects, including cumulative effects;
- procedures for adequate public consultation;
- procedures for setting conditions to protect the environment;

Constraints on the requirements listed in 4.1 being met with the current system for environmental management of petroleum and mineral mining activities beyond the 12-mile include the following:

- procedures are claimed to be confusing, overly complicated and continually changing;
- many agencies involved (see Table 1);
- no lead agency (see Table 2);
- many Acts involved (see Table 1);
- a perceived lack of coordination in legislation;
- a perceived lack of procedures for environmental effects assessment (but compliance with marine protection rules may be sufficient because the rules are environmental standards drafted in anticipation of environmental effects);
- lack of procedures for setting environmental conditions, apart from when marine protection rules initially drafted (but developments have to comply with marine protection rules);
- no opportunities for public comment during the planning stages of off-shore developments;
- procedures for environmental management beyond the 12-mile limit are not consistent with procedures inside the 12-mile limit.

4.1 Key requirements

4.2 Constraints on the current system

5. POSSIBLE STRATEGIES TO MEET REQUIREMENTS FOR EFFECTIVE ENVIRONMENTAL MANAGEMENT

Procedures for environmental management beyond the 12-mile limit need to be clarified with all affected parties because of a perceived lack of coordination in legislation and lack of procedures for environmental assessment. Consultation should include tangata whenua and those agencies listed in Appendix 1.

A lead agency needs to be formally designated to coordinate the large number of Crown agencies with environmental management responsibilities beyond the 12-mile limit.

Petroleum and mineral resource development beyond the 12-mile limit must comply with the marine protection rules being drafted under the Maritime Transport Act 1994. Doubt has been expressed as to whether this will provide adequate environmental effects assessment at the stages before, during and after the development takes place. Environmental effects assessment at all these stages could be required for such development, including decommissioning of facilities.

There is a lack of procedures for setting conditions for protecting the environment beyond compliance with the marine protection rules. The setting and enforcement of such conditions could be included in the management procedures for petroleum and mineral mining activities beyond the 12-mile limit.

The Maritime Safety Authority, on behalf of the Minister of Transport, carried out extensive consultation with interested parties in drafting marine protection rules under the Maritime Transport Act 1994. A formal process is provided in s 446 of the Act for public scrutiny when new rules are being made.

There are, however, no opportunities for public comment during the planning stages of off-shore developments. Once the marine protection rules are promulgated, there are in general no consultation procedures.

There is some scope under s 389(1)(d) and (h) of the Maritime Transport Act 1994 for the Minister of Transport to allow the marine protection rules for dumping and incineration to specify the persons

5.1 Clarification of procedures

5.2 Environmental effects assessment

5.3 Setting and enforcement of environmental conditions

5.4 Public consultation

who are to receive notice or be consulted on an application for a permit. This is relevant because under s 257 of the Act the definition of "dumping" includes the deliberate disposal or abandonment of an offshore installation.

Further opportunities for public comment, including the tangata whenua, could be introduced at both the planning and environmental effects assessment stages of petroleum and mineral mining activities beyond the 12-mile limit.

5.5 Decommissioning of installations

All the environmental effects of decommissioning of offshore installations, including complete removal, may be covered by s 261(5) Maritime Transport Act 1994 once the appropriate marine protection rule is in place in 1997, but this needs to be reviewed.

6. CONCLUSIONS AND RECOMMENDATION

From this investigation the following conclusions can be drawn:

1. There continue to be different procedures for within and beyond the 12-mile limit with consequent confusion for petroleum and mineral exploration companies.
2. There is a perceived lack of coordination in legislation governing environmental management beyond the 12-mile limit. Procedures therefore need to be clarified with all affected parties. Consultation should include tangata whenua, the public and the agencies listed in Appendix 1.
3. There are a large number of Crown agencies with different statutory responsibilities, under many different Acts, beyond the 12-mile limit. A lead agency needs to be formally assigned to coordinate these agencies.
4. The regime for protection of the marine environment beyond the 12-mile limit is still in a transitional phase. Key parts of the Maritime Transport Act 1994 are not yet in force and the first marine protection rules are due to come into force in 1997.

However, even once the marine protection rules come into force, it appears that management of petroleum and mineral mining activities beyond the 12-mile limit will not include adequate procedures for environmental effects assessment, setting and enforcement of environmental conditions and public consultation.

RECOMMENDATION: that the Minister for the Environment set up a multi-agency working group to:

- clarify procedures for environmental management of petroleum and mineral mining activities beyond the 12-mile limit;
- nominate a lead agency to coordinate the large number of Crown agencies with environmental management responsibilities beyond the 12-mile limit;
- identify strategies whereby environmental effects assessment, setting and enforcement of environmental conditions and public consultation are included in management procedures for petroleum and mineral mining activities beyond the 12-mile limit and are consistent with procedures inside the 12-mile limit.

GLOSSARY

Territorial sea (TS)	areas of sea out to 12 nautical miles from low-water mark
Coastal marine area	the foreshore, seabed, coastal water, and the air space above from mean high water springs to the 12 nautical mile limit (TS)
Exclusive Economic Zone (EEZ)	areas of sea, seabed, and subsoil beyond and adjacent to TS with outer limit 200 nautical miles from low-water mark
NZ fisheries waters	inland waters plus internal waters plus TS plus EEZ
Continental shelf	seabed and subsoil of submarine areas from the 12-mile limit to the 200-mile limit or the outer edge of the continental margin, whichever is further

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