

## Office of The Mayor

4 February 2015

Mr. James Stevenson-Wallace  
General Manager  
New Zealand Petroleum and Minerals  
Ministry of Business, Innovation and Employment  
PO Box 1473  
Wellington 6140

BlockOffer2015@mbie.govt.nz

Dear Mr. Stevenson-Wallace

### **RE: Proposed Block Offer 2015**

#### **1.0 Introduction**

- 1.1 Christchurch City Council (the Council) thanks New Zealand Petroleum and Minerals for the opportunity to comment on proposed Block Offer 2015. We appreciate that while the Crown Minerals Act 1991 (the Act) only requires that the Government consult with iwi and hapu, local governments are also being consulted on the current proposal.
- 1.2 In addition to consulting with councils, we strongly urge New Zealand Petroleum and Minerals to undertake a broader consultation with the public. There is nothing in the Act that would preclude this.
- 1.2 The Council has several concerns with the proposed Block Offer and what it may mean for Christchurch. In brief these are:
- proximity of the Offshore Great South Canterbury Basin 15GSC-R1 (15GSC-R1) to Schedule 4 lands and the Banks Peninsula Marine Mammal Sanctuary;
  - risks to the marine environment from deep-sea petroleum exploration and production;
  - potential adverse economic impacts on the local community from oil spills;
  - risks to the marine and coastal environment of Banks Peninsula;
  - need for public engagement.

#### **2.0 Background**

- 2.1 The Local Government Act 2002 states that

*In performing its role, a local authority must act in accordance with the following principles: ... in taking a sustainable development approach, a local authority should take into account—*

- (i) the social, economic, and cultural interests of people and communities; and*  
*(ii) the need to maintain and enhance the quality of the environment; and*  
*(iii) the reasonably foreseeable needs of future generations.<sup>1</sup>*

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<sup>1</sup> Local Government Act 2002, as amended; section 14 (1)(h).

The Council's submission has this principle in mind.

- 2.2 The Christchurch and Canterbury area is in recovery after a series of major earthquakes in 2010 and 2011. This has caused us all to be highly vigilant about natural hazards and about risk mitigation. The Council considers that the risks of deep-water offshore petroleum exploration and production in these areas are too great for the reasons described in our submission.

### **3.0 Specific Comments**

#### ***Schedule 4 lands***

- 3.1 Lands described under Schedule 4 of the Act are those for which access arrangements are limited and for which Department of Conservation permission must be acquired.
- 3.2 Schedule 4 of the Act applies to several reserves located in, or immediately adjacent to, Christchurch's territorial boundaries. There are six Schedule 4 reserves Christchurch:
- '*2 Any reserve classified as a nature reserve under section 20 of the Reserves Act 1977*': Dan Rogers Nature Reserve;
  - '*3 Any reserve classified as a scientific reserve under section 21 of the Reserves Act 1977*': Waihora Scientific Reserve, Kaitorete Spit Scientific Reserve [170.6151ha], and Kaitorete Spit Scientific Reserve [91.422ha]
  - '*7 Any area declared a marine reserve under section 4(1) of the Marine Reserves Act 1971*': Akaroa Marine Reserve, Pohatu Marine Reserve.
- 3.3 Maps showing the locations of these reserves are provided in Attachment 1.
- 3.4 The Council considers that Schedule 4 reserves within and adjacent to Christchurch's territorial boundaries should be protected.
- 3.5 The Council further considers that the proximity of portions of proposed 15GSC-R1 represents an unnecessary risk to the Schedule 4 reserves.
- 3.6 The Council recommends that the northern and eastern boundaries of 15GSC-R1 are modified to increase the distance of the northern and eastern graticular sections from the Schedule 4 reserves and the outer limit of the territorial sea (twelve nautical mile limit).

#### ***Banks Peninsula Marine Mammal Sanctuary***

- 3.7 The Banks Peninsula Marine Mammal Sanctuary (the sanctuary) was established in 1988. The area of the sanctuary was expanded in 2008. The sanctuary includes all of the territorial sea off the coast of Banks Peninsula, as described in Schedule 1 of the Marine Mammals Protection (Banks Peninsula Sanctuary) Amendment Notice 2008. The sanctuary extends from the mouth of the Waipara River to the north and the Rakaia River to the south, to the outer limit of the territorial sea.
- 3.8 The sanctuary is home to the endangered Hector's Dolphins, as well as an abundance of coastal and marine flora and fauna.
- 3.9 The northern portion of 15GSC-R1 in proposed Block Offer 2015 is offshore from Banks Peninsula, with graticular sections that abut or are near the twelve nautical mile limit. A map showing a portion of the northern area of 15GSC-R1 overlaid with the boundaries of the sanctuary is provided in Attachment 2.
- 3.10 The Council considers that the sanctuary is a valuable natural and community resource that should be protected, particularly in light of its importance to the conservation of the endangered Hector's Dolphins.
- 3.11 The Council recommends that those graticular sections of 15GSC-R1 that abut the sanctuary are removed from the block offer. The Council also recommends that the

northern and eastern boundaries of 15GSC-R1 are further modified to increase the distance of the northern and eastern graticular sections from the sanctuary.

### **Risks from deep-sea petroleum exploration and production**

- 3.12 It is our understanding that much of proposed 15GSC-R1 is in water exceeding 1000 metres. Due its nature — extraction of volatile substances under extreme pressure in a remote environment — deep-sea petroleum exploration and production carries risks. While the probability of the occurrence of an adverse event may not be high the outcome of such an event can be catastrophic.
- 3.13 The Council understands that operators are responsible for responding to any incident or adverse event, and are required to keep regulators informed of any adverse events or reportable incidents. The Council also understands that petroleum permit applications must clearly demonstrate that operators can undertake the proposed work, and deal with any accidents or incident. It is the Council's view that that this may lead to a perverse outcome in which companies will potentially overstate their safety and response capabilities.
- 3.14 New Zealand's national oil spill response capability is limited to 5500 tonnes. Maritime New Zealand has three oil response vessels that are designed to work in sheltered water.
- 3.15 None of the graticular sections in the Offshore Great South Canterbury Basin area could be reasonably considered to be in sheltered water.
- 3.16 A spill greater than 5500 tonnes would require equipment and support that is available through international cooperation agreements. The Council understands that it would take weeks for equipment to arrive from overseas to respond to a large oil spill in excess of 55 tonnes.
- 3.17 In a review of New Zealand's oil spill response capability completed in 2011<sup>2</sup> the risk to coastal areas was raised.

*"In this area [Taranaki offshore] three companies are operating production wells and associated platforms. ... While the historic oil spill incidence in the area is low, the potential is high. ...*

*The New Zealand requirements to respond are covered under the Part 130B Tier 1 response plans. The operators have in place a small amount of equipment to respond and some trained personnel. However the general outcome was no different to elsewhere in New Zealand; each spill would become a Tier 2 spill and be the responsibility of the Regional Council (or MNZ [Maritime New Zealand] if outside the 12 mile limit). ...*

*In the offshore situation it is unlikely that the "contain and recover" option (booms and skimmers) would be practical for weather reasons, leaving a dispersant attack as the most practical option. The products being handled are apparently amenable to dispersants; however the window of opportunity is tight, at around four hours from start of spill. Due to the reliance on the Regional Council/MNZ to mount a response, it is doubtful if a reasonable first strike dispersant attack could be mounted within the window of opportunity. This would almost certainly lead to a coastal clean-up operation.'*

- 3.18 The Council is concerned with the risk posed by offshore petroleum exploration and production in deep open water to Christchurch's coastal environment. The Council is also concerned about the time it would take for Maritime New Zealand to respond to an oil spill from a deep-water petroleum exploration or production facility.

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<sup>2</sup> Review of New Zealand's Oil Pollution Preparedness & Response Capability, February 2011, Maritime New Zealand.

- 3.19 Given that New Zealand's national response capability is limited to 5500 tonnes, it is the Council's view that the well-being, income and environmental protection of the country is such core business for the government that it cannot be delegated to offshore oil companies who may share none of those concerns. The Council strongly recommends that further consideration is given to the risks of offshore petroleum exploration and production before any additional areas are released for tender.

### ***Economic impacts from offshore oil spills***

- 3.20 There have been significant impacts to local communities, economies, and environments from offshore oil spills. The 2010 Deepwater Horizon disaster in the Gulf of Mexico resulted in eleven crew deaths and released an estimated 4.9 million barrels (over 600,000 tonnes) over a three-month period. Civil and criminal fines have cost the main parties Transocean and British Petroleum over US\$1.4 billion and US\$4.5 billion respectively. Economic losses in the fishing and tourism industries due to the 2010 oil spill were estimated to have been several US billion dollars.
- 3.21 The Council is concerned about the impacts to our community and economy from offshore oil spills. Our two biggest export earners, agriculture and tourism, with their brand promise of being 100 percent pure, rely in part on New Zealand as being seen as a world leader in environmental stewardship.
- 3.22 It is the Council's view that our horticulture and agricultural exports could be disadvantaged, at least in the short term, as a consequence of damage to the brand promise of '100 percent pure'.
- 3.23 Although the 2010 and 2011 earthquakes slowed visitor numbers Christchurch's tourism industry retains an important role in the City's economy. Christchurch International Airport had over 1.35 million international passengers in twelve-month period ending October 2014. During the 2012/2013 cruise season 65 cruise ships visited Akaroa, with 72 cruise ships scheduled to call into Akaroa during the 2014/14 cruise season.
- 3.24 Visitor numbers to Christchurch are expected to rise significantly in 2015, as the city will be hosting matches for both the Cricket World Cup and the FIFA U20 World Cup in February and June respectively.
- 3.25 The local economies of some of Banks Peninsula towns and settlements are based at least to some extent on the visitor industry. Some of our most successful Peninsula businesses focus specifically on offering visitors the opportunity to experience the Peninsula's unique fauna and natural environment. In addition to the effect of any oil spill on international tourism numbers, the impact on domestic and local visitor numbers to Banks Peninsula, drawn largely by its pristine coastal environment, would be significant.
- 3.26 One of the arguments that is put forward to promote offshore oil exploration is employment growth. It is the Council's view that, in the near term, for Christchurch and the surrounding areas this argument is weak as there is a strong demand for skilled workers in the region due at least in part to earthquake recovery.
- 3.27 Although oil companies pay royalties to the government on a percentage of their net profit, it is unclear how much, if any, of the money received would go to local communities in which the oil companies are operating.
- 3.28 The Council understands that oil that may be prospected off the coast of New Zealand is not a grade of oil that can be refined in New Zealand. The oil taken from wells in New Zealand would therefore have to be shipped overseas to be refined.
- 3.29 The Council is concerned that offshore petroleum exploration and production could put Christchurch's economy at risk in the event of an oil spill off our coast.

3.30 The Council is also concerned that reductions in the global price of crude oil, such as that currently being experienced, may result in abandonment or otherwise dereliction of care of offshore assets that could pose a risk to the area's economy.

#### ***Value of Banks Peninsula and its coast***

3.31 Christchurch is proud of its natural environments and their community value. The coastline of Banks Peninsula is regarded as one of the city's major natural attractions, and its coastal environment and beaches attract many domestic, as well as international, visitors.

3.32 The coastal areas of Banks Peninsula include a number of flora and fauna that are identified as species of concern in the Banks Peninsula District Plan, such as

- Black-billed Gull
- Black-fronted Tern
- Bush pohuehue
- *Coprosma acerosa* (sand coprosma)
- *Craspedia Kaitorete* (Kaitorete Woollyhead), one of the rarest plants in New Zealand found only on Kaitorete Spit
- *Isolepis basilaris* (Pygmy clubrush)
- *Muehlenbeckia ephedroides* (leafless muehlenbeckia or leafless pohuehue)
- *Raoulia monroi* (fan-leaved mat daisy)
- Salt sedge
- Sooty Shearwater
- Southern Crested Grebe
- White-flipped penguin
- Yellow-eyed Penguin

3.33 A number of species in Banks Peninsula are already under pressure. An oil spill off our coast could have significant adverse consequences on these species.

3.34 The Council submits that the value of our outstanding and unique environment would be put at risk from petroleum exploration and production offshore from our coast.

3.35 The Council suggests that an environmental contingency bond be put in place before any drilling takes place. This would be an upfront sum equal to the worst case risk scenario and held as a bond by the relevant government authority until the drilling has been completed.

#### ***Public engagement***

3.36 The Council is deeply concerned that offshore areas, in which high-risk petroleum exploration activities could occur, are being proposed for Block Offer 2015 in the absence of public consultation. Even if the probability of an accident from such activities is not high, the consequence of an accident can be catastrophic.

3.37 In addition to consulting with councils, we strongly urge New Zealand Petroleum and Minerals to undertake a broader consultation with the public. There is nothing in the Crown Minerals Act that would preclude this. The Council is aware that the European Union, member states are required to undertake 'early and effective public consultation' prior to the onset of oil and gas exploration activities (Directive 2013/30/EU).

- 3.38 The Council submits that block offer proposals that include offshore areas, in which high-risk petroleum exploration activities could occur, should be subject to greater public consultation.
- 3.39 The Council further recommends that tenderers' safety plans are publicly available so that the community has the opportunity to consider the risks with all information before permits are granted for exploration.
- 3.40 The Council received deputations concerning proposed Block Offer 2015 at its 29 January 2015 meeting. The deputations expressed support for the Council's submission and argued against the release of areas offshore from Christchurch for the purpose of petroleum exploration and production. The Council acknowledged the deputations and committed to including written versions of the deputations with its submission. The written deputations are provided in Attachments 3 and 4.

### **Climate change considerations**

- 3.41 The Council questions the necessity and appropriateness of continued exploitation of remaining petroleum reserves in light of the contribution of its impacts on climate change.
- 3.42 Lord Stern recently noted that if all the current fossil fuel reserves were to be burned, 'we will emit enough CO<sub>2</sub> to create a prehistoric climate, with Earth's temperature elevated to levels not experienced for millions of years'.<sup>3</sup>
- 3.43 In the 2014 report on oil and gas drilling in New Zealand, the Parliamentary Commissioner for the Environment stated:
- 'The great environmental issue associated with any development of fossil fuels is, of course, climate change. When they are burned, oil, natural gas, and coal all increase the concentration of carbon dioxide in the atmosphere. Both fracking and deep sea drilling provide access to what is sometimes called 'unconventional' oil and gas, and so raise questions about whether and how New Zealand can pursue fossil fuel extraction while still responding to climate change and the need to move to a low-carbon future.'*<sup>4</sup>
- 3.44 The Council strongly urges that much greater consideration is given to the impacts of petroleum exploration and production on climate change before releasing onshore and offshore areas for further petroleum exploration, and before granting consent for further petroleum production.

## **4.0 Concluding Remarks**

- 4.1 In summary, the Council makes the following submission.
- The northern and eastern boundaries of 15GSC-R1 should be modified to increase the distance of the northern and eastern graticular sections from the Schedule 4 reserves and the outer limit of the territorial sea.
  - The graticular sections of 15GSC-R1 that abut the sanctuary should be removed from the block offer.
  - The northern and eastern boundaries of 15GSC-R1 should be modified to increase the distance of the northern and eastern graticular sections from the Banks Peninsula Marine Mammal Sanctuary.

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<sup>3</sup> Professor Lord Stern of Brentford, London School of Economics and Political Science; 2013. *Unburnable Carbon 2013: Wasted capital and stranded assets*. <http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2014/02/PB-unburnable-carbon-2013-wasted-capital-stranded-assets.pdf>

<sup>4</sup> Parliamentary Commissioner for the Environment; 2014 *Drilling for oil and gas in New Zealand: Environmental oversight and regulation*. <http://www.pce.parliament.nz/assets/Uploads/PCE-OilGas-web.pdf>

- The Council strongly recommends that further consideration is given to the risks of offshore petroleum exploration and production before this or any other additional areas are released for tender.
- The value of our outstanding and unique environment would be put at risk from petroleum exploration and production offshore from our coast.
- The Council recommends that an environmental contingency bond be put in place before any drilling takes place.
- The Council submits that block offer proposals that include offshore areas, in which high-risk petroleum exploration activities could occur, should be subject to greater public consultation.
- The Council strongly urges that much greater consideration is given to the impacts of petroleum exploration and production on climate change before releasing onshore and offshore areas for further petroleum exploration, and before granting consent for further petroleum production.

4.2 If you require clarification of the points raised in this submission, or additional information, please contact Helen Beaumont, Natural Environment and Heritage Unit Manager, phone 03 941 8812, email [helen.beaumont@ccc.govt.nz](mailto:helen.beaumont@ccc.govt.nz).

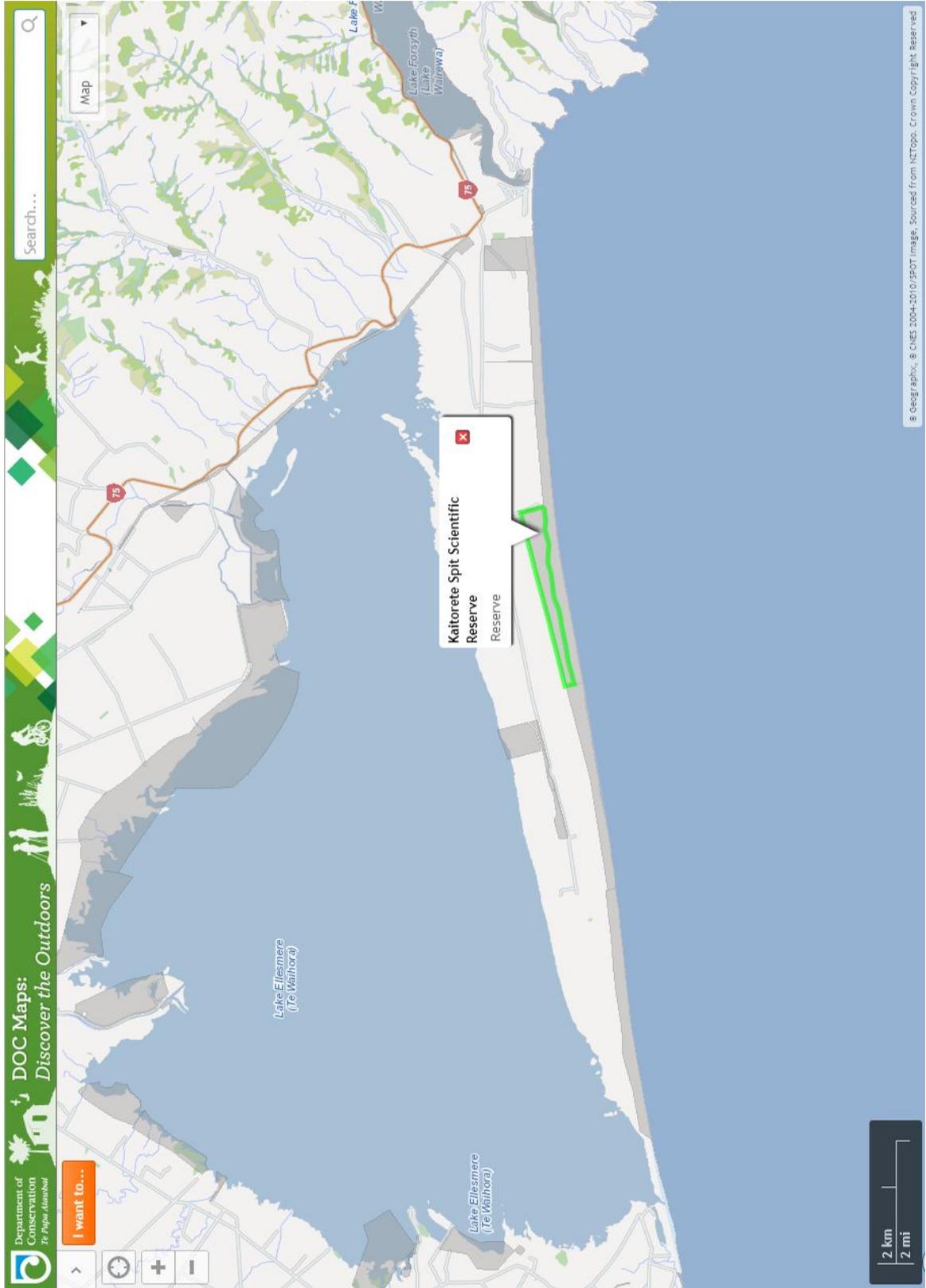
Yours sincerely

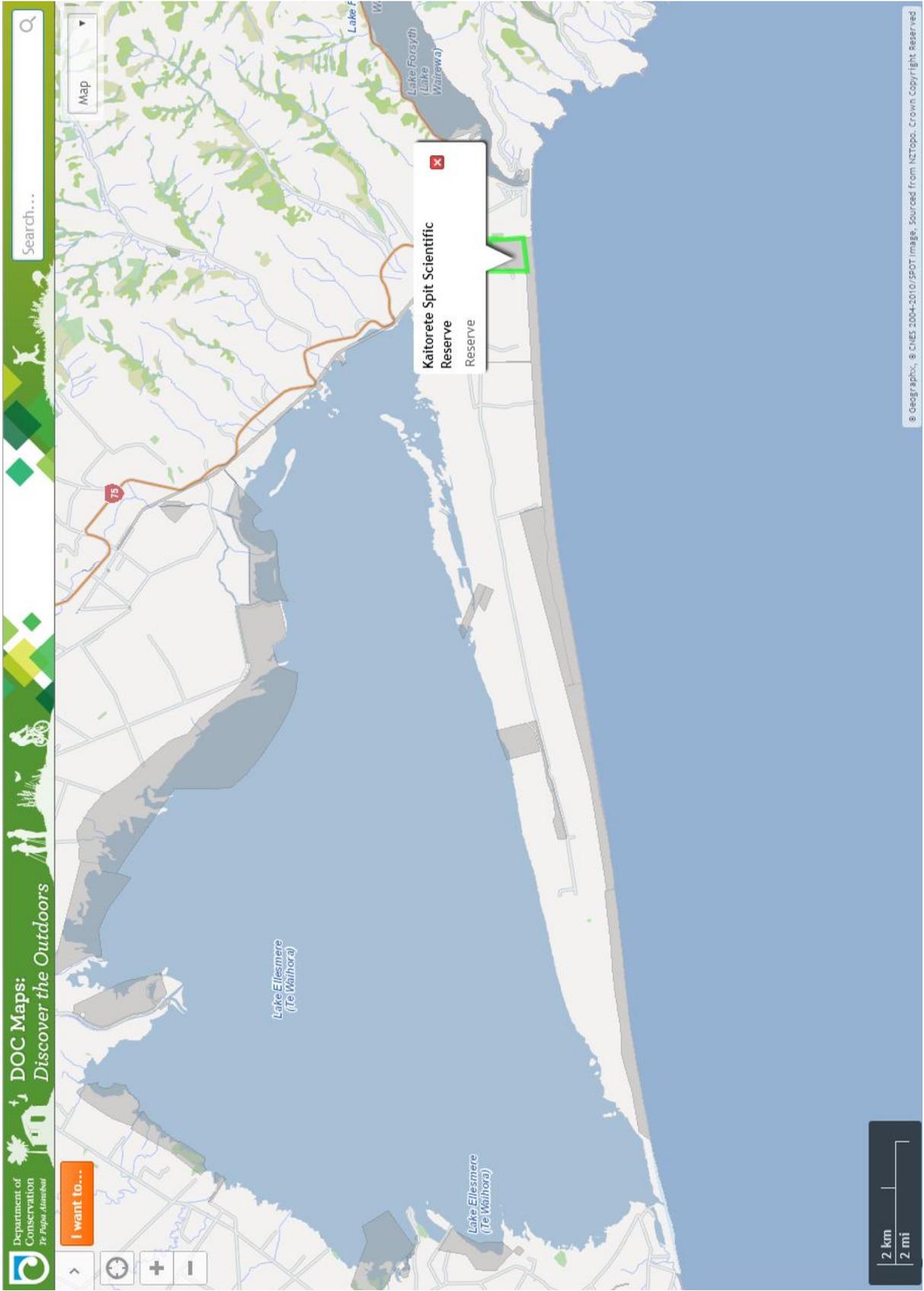


Lianne Dalziel  
**Mayor of Christchurch**

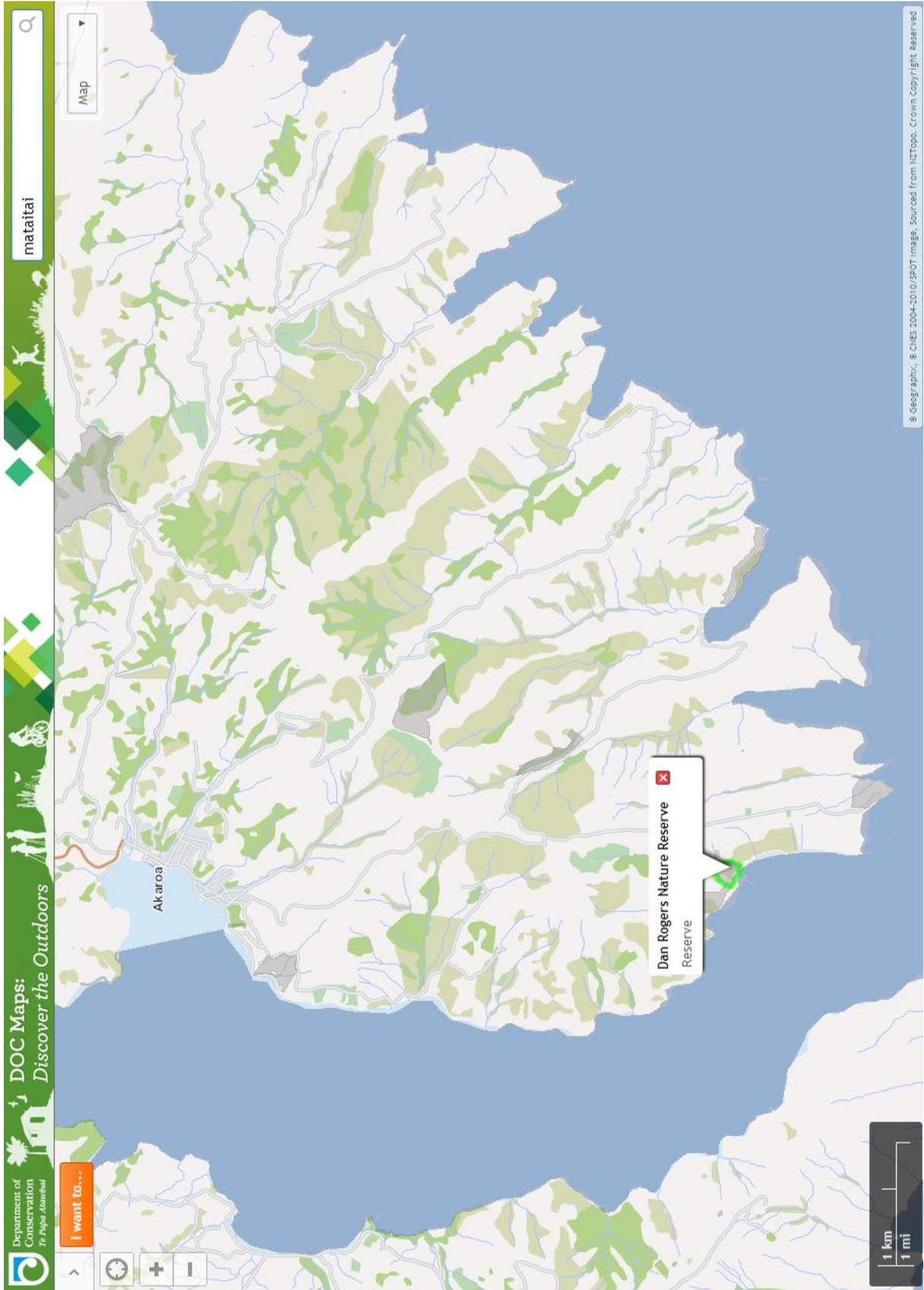
**On behalf of CHRISTCHURCH CITY COUNCIL**

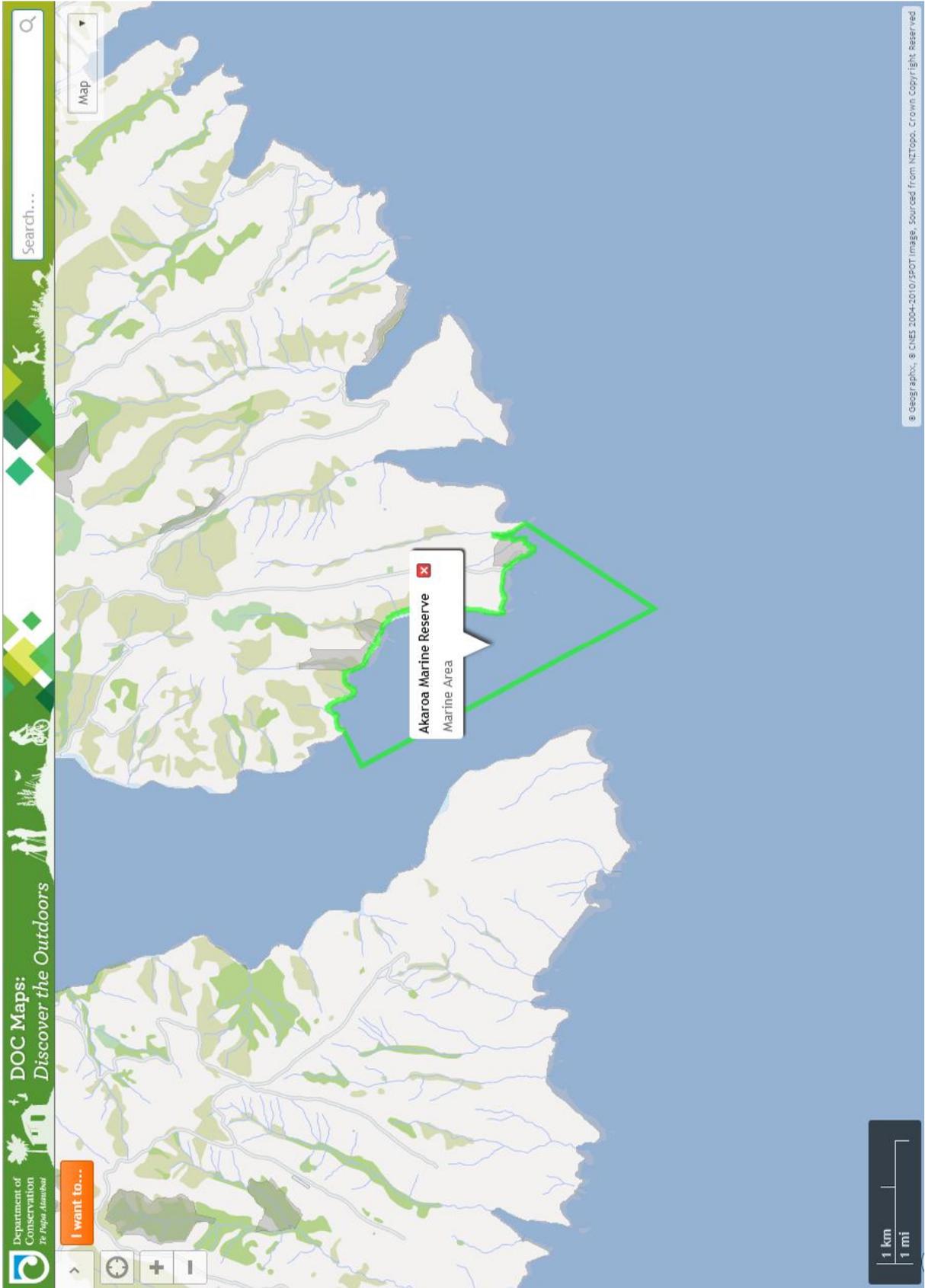
# Attachment 1 Schedule 4 Reserve Maps













Attachment 2  
Detail of Offshore Great South-Canterbury 15GSC-R1  
with Banks Peninsula Marine Mammal Sanctuary added



Attachment 3  
Deputation from Oil Free Ōtautahi Christchurch

29/01/2015

## Deputation concerning the Christchurch City Council's opposition to the 2015 oil and gas block offers

Presented by Siana Fitzjohn on behalf of Oil Free Otautahi

#### Introduction:

I am a geography graduate from the University of Canterbury representing our grassroots group Oil Free Otago. Our group is part of a network of organisations across New Zealand working to oppose deep sea oil drilling. We are supportive of the Christchurch City Council's submission against the 2015 oil and gas block offers as consultation is no longer undertaken with the public.

#### Background:

Ever since deep-sea oil exploration began being pursued a few years ago we have witnessed a number of worrying steps taken by our government to quell opposition to all exploratory operations. One of these steps (dubbed the 'Anadarko Amendment') was to illegalise protest at sea within 500 metres of a seismic survey vessel or drilling rig. The other was to make oil exploration a 'non-notified discretionary activity'. This ensured that the public was excluded from the consultation process, unable to submit against proposed exploration areas or formally oppose fossil fuel exploration. These are systematic attempts to shut down opposition and proceed with a fossil fuel agenda regardless of the legitimate concerns of the New Zealand public. The only parties to be consulted on oil exploration areas are now Iwi, hapu, and local councils.

#### Christchurch City Council submission highlights:

We would like to commend the Christchurch city council's opposition to the 2015 oil and gas block offers. In particular we want to thank the council for urging the government to undertake a broader consultation with the public. Your submission also highlights the risks posed by deep-sea oil exploration to our marine environment, the vulnerability of our coastal communities to an oil spill, and the proximity of the prospecting areas to the Banks Peninsula Marine Mammal Sanctuary. I also commend your suggestion that a bond be taken out by prospecting companies for the worst-case oil spill scenario. This would provide a disincentive for oil drilling companies; however the Council should emphasise that this measure should be a last resort and prohibiting all oil exploration activities off the coast of New Zealand is the only socially and environmentally sound option. The council has outlined excellent reasons to oppose the new oil and gas block offers, and we would like to elaborate on further reasons that Canterbury would be negatively impacted by deep sea oil exploration.

Further reasons that the 2015 oil and gas block offers should be opposed:

- *Risks posed by seismic ocean blasting*

Opening up areas of ocean to tender by offshore oil companies exposes these areas to huge risks in the form of the seismic ocean blasting. This first phase of oil exploration involves 2D and 3D surveys being obtained by setting off sonic blasts every few seconds to map the ocean floor. This has the potential to cause physical harm to marine animals in close proximity to the survey vessel (Gordon et al, 2003). Increasing numbers of studies describe damage to cetaceans (whales and dolphins) by seismic testing as it impacts upon their ability to use sonar to feed, navigate, and communicate with one another (Gordon et al, 2003; Compton et al, 2008). Little is known about the full impact of seismic ocean blasting on New Zealand's marine environment. We feel that there should have been rigorous studies undertaken and *detailed* impact assessment reports submitted before unprecedented areas of our oceans were opened up to seismic testing. In the case of seismic testing or an oil spill the beneficial effects of the Banks Peninsula Marine Mammal Sanctuary are nullified as there is no way to ensure wide-ranging protected species such as the Hector's dolphin do not travel into areas affected by seismic testing or an oil blowout. There is also no way to prevent oil from entering the sanctuary in the event of an oil spill.

- *Lack of capacity to cope with an oil spill*

In addition to the seismic surveying the exploratory drilling phase has the potential to go catastrophically wrong. The greater the number of exploratory drills being conducted the greater the statistical chance of a blow out. New Zealand is utterly unequipped to cope with the impacts of a spill and our marine environment would be irreparably damaged. As the council rightly pointed out in their submission the 3 oil spill response vessels that would be dispatched are unfit for open water. The Gulf of Mexico spill had thousands of vessels respond and the spill was not stemmed for months despite the abundance of relief wells in the area. It would take weeks before a relief well would even arrive in New Zealand and attempt to stem a blow out. The Corexit dispersant is the number

one response at our disposal; however it is a highly toxic material containing carcinogens (Oil Spill Intelligence Report, 2012). Any oil response strategy involving Corexit has the potential to do long term damage to marine food chains and should not be considered a safe spill control method.

- *Economic and environmental vulnerability to an oil spill*

The risks to our marine environment translate into severe economic risks for communities and industries that rely on a healthy marine ecosystem. Banks Peninsula, in particular Akaroa, relies on domestic and international tourism as their main source of income. They also rely on the ocean for food resources. All of this would be put into jeopardy in the event of a spill. Oil exploration off the coasts increases economic vulnerability and decreases resilience of communities. I talked to business owners in Akaroa and many were concerned about the drilling operations as they realised that their livelihoods depend on a sound marine environment. Deep-sea oil operations would threaten the already fragile fisheries and the tourism operators that rely on unique wildlife and pristine scenery. Oil exploration activities also increase New Zealand's economic vulnerability because we are liable to cover the majority of costs of a spill clean up. When Andarko was exploratory oil drilling in New Zealand they were legally required to cover 30 million dollars of the clean up of a spill, even though a large spill would cost into the billions of dollars to respond to. New Zealand taxpayers would front the majority of the clean up costs. This does not include economic losses faced by fishing, tourism and export industries after the incident. After the Gulf of Mexico spill the economic losses to the tourism and fishing industries stretched into the tens of billions of US dollars (Walsh, 2010; Proctor, 2010). New Zealand does not have the capacity to buffer itself from these hefty economic and social costs in the event of an oil spill.

- *Ongoing emotional impacts from loss of natural heritage*

In the 2010 and 2011 earthquakes Christchurch went through a massive upheaval and our communities are still dealing with the ongoing psychological and social

impacts of a major disaster. Residents already feel like their cultural heritage has been lost as much of the city was destroyed. Now we're opening up our coastlines to risks of a different kind of disaster, one that threatens our natural heritage. Cities can be rebuilt, but our marine ecosystem would never recover from an oil spill such as the Deepwater Horizon disaster in the Gulf of Mexico. Cantabrians value the ocean and coastlines for food, recreation and enjoyment of the natural world. Not only is there a strong economic reliance on the ocean but also a large emotional connection and reliance on our beaches and oceans. They provide immeasurable emotional support for communities. This intrinsic value of our marine systems is not subject to easy impact assessment despite it being one of the most important things put at risk by these operations.

The grief wrought by a deep-sea oil spill on coastal communities would be severe and long lasting. Cantabrians have been through enough already without adding a deep-sea oil blow-out to the mix. As we have seen in Canterbury disasters can occur even when the chances are slim. Earthquakes are unavoidable- but we can mitigate 100% of the risks associated with deep-sea oil exploration by closing our oceans to offshore oil companies. Having our coastlines open to deep sea oil exploration also impacts upon our cultural identity- New Zealanders pride themselves on being considered an environmentally progressive nation with a strong connection to nature. Oil exploration off our coastline makes us all inadvertent accomplices to an industry renowned for its abysmal environmental record. These new oil and gas block offers demonstrate our government's commitment to a dying industry over its commitments to the wishes and needs of its residents.

- *Oil exploration's contribution to runaway climate change*

This final (and most important) reason for not allowing the 2015 oil and gas block offers to proceed is that fossil fuel extraction contributes massively to climate change. It is a point that was not mentioned in the Council's submission but one that should be considered in any operation involving fossil fuel extraction. The IPCC (Intergovernmental Panel on Climate Change) has reiterated that anthropogenic climate change is the single biggest threat to humanity. Humanity

cannot afford to burn more than 20% of its known fuel reserves if we are to avoid runaway climate change (Carbon Tracker Initiative and The Grantham Research Institute, 2013). In spite of this we are continuing to explore for more fuel reserves, which if burned would significantly contribute to accelerating climate change. This is reckless not just on a local level but for its worldwide ramifications. Our neighbours in the Pacific Islands stand to lose their homes due to rising sea levels, and we're allowing companies to search for further fuels that will intensify climate change impacts. By opening up these new exploration areas the government are allowing us to become the final frontier of an outdated oil industry and locking us into a high emitting future. The world is waking up to climate change and fast switching to renewable energy sources- relying on fossil fuels for economic gain lowers our economic resilience to the global changes that are taking place. New Zealand could be a world leader in renewable energy and transition to a high tech green economy, which could earn up to 22 billion dollars annually (PriceWaterhouseCoopers, 2009). This would set an example for the rest of the world and we'd become part of the solutions to climate change instead of exacerbating the problem. We are forgoing a lucrative green economy for the sake of a dying fossil fuel industry and in the long term it's our younger generations that will have to pay for it. This demonstrates strong argument for abandoning the deep-sea oil vision in New Zealand in its entirety.

#### Concluding remarks:

In conclusion I would like to say that the consultation process for deep sea oil drilling should be proportionate to its social, environmental and economic effects on our communities. I want to thank the council sincerely for opposing these block offers. I would ask that elements of my submission be added to the Council's submission, particularly the reference to climate change as a severe environmental and social impact of oil drilling. In addition to this I would like to suggest that the Council takes a strong oppositional stance to deep-sea oil exploration in its entirety in addition to opposing the new areas of exploration. The Council is clearly in tune with the needs of our community and are representing our environmental interests at a time when the public's voices have been sidelined and ignored.

References:

Compton, R., Goodwin, L., Handy, R., Abbott, V. (2008) A critical examination of worldwide guidelines for minimizing the disturbance to marine mammals during seismic surveys. *Marine Policy*, 32:3, pp. 255-262.

Gordon, J., Gillespie, D., Potter, J., Frantzis, A., Simmonds, M. P., Swift, R., Thompson, D. (2003) A review of the effects of seismic surveys on marine mammals. *Marine Technology Society Journal*, 37:4, pp. 16-34.

New research reinforces Corexit's toxicity and persistence. (2012) *Oil Spill Intelligence Report*, 35:51, pp. 2-3.

PriceWaterhouseCoopers (2009) PriceWaterhouseCoopers Report to New Zealand Trade and Enterprise: A Clean Economic Vision for New Zealand in 2025.

Proctor, C. (2010) Big price tag for recovery of Gulf Coast. *Penacola News Journal*.

Unburnable Carbon: Wasted capital and stranded assets. (2013) *Carbon Tracker Initiative and The Grantham Research Institute*, LSE.

<http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2014/02/PB-unburnable-carbon-2013-wasted-capital-stranded-assets.pdf>

Walsh, B. (2010) Gulf of Mexico oil spill: No end in sight for eco-disaster. *Time*.

**Attachment 4**

Deputation from River of Life Network Ōtautahi Christchurch

29 January 2015

From : The River of Life Network

To : The Christchurch City Council

To the Christchurch City Council,

I am a local writer and filmmaker. I produced and directed the film Water Whisperers Tangaroa which looks at water places - lakes, rivers and ocean - around New Zealand where people have successfully restored and redeemed their waterways and increased their fish stocks and improved biodiversity in amazing and unexpected ways. I am making this deputation on behalf of the River of Life Network and have prepared this material with Rev Mark Gibson, the Co-ordinator of the River of Life Network. The River of Life Network has been going for four years. It is a faith based network that tries to play a constructive role around conservation and environmental issues in Canterbury. It was one of the founding groups of the Avon Otakaro Network and has also lead a number of walks along both the Heathcote and Avon Rivers.

The Government and the Department of Conservation are currently looking at the entire coastline of the country at present, and working out appropriate areas for Marine Reserves, Marine Mammal Sanctuaries, Taiapure and Rahui areas. We have been working collaboratively with DOC staff, Ngai Tahu, ECAN, NIWA, and the Associate Minister of the Environment Nicky Wagner, to see if the whole of the Canterbury rohe from Kaikoura to Timaru, can be prioritised by DOC and work in the same way as the Otago Marine Protected Area two year process, which is currently taking place.

We would like the Christchurch City Council to have some involvement with this collaboration also, because a good chunk of the Canterbury coastline is in the Christchurch City Council area. Tourists, including cruise ships, school children, tertiary students, local iwi, fishermen, divers, and locals would all benefit from the increase in numbers and species of fish, once a necklace of Marine Reserves, Marine Mammal Sanctuaries, Taiapure and Rahui areas was in place along the Canterbury coastline. This region, because it is an important meeting place of subantarctic and subtropical zones, and has two very large expanses of water near the coast - the Ihutai Estuary and Te Waihora Lake Ellesmere, has the same number of bird species as the whole of the Amazon. You take no risks, you don't muck around with treasures like this, you protect them and you look after them.

The potential risk of an accident while drilling is higher in this region, because of the depth and also because of the seismic fragility. The introduction of deep sea petroleum drilling into the deep, fragile, seismically sensitive environment of the Canterbury coastline is potentially catastrophic for aquatic and terrestrial life and would spell doom to the Marine Projected Areas that are in the process of being envisaged and developed. It is not appropriate that deep sea drilling blocks from this area be allocated to oil companies.

Deep sea oil drilling is extremist extraction and unnecessary. The South Island can easily produce enough electrical energy to run our car fleets, our businesses, our farms and our homes. Christchurch could run solely on electric energy. Why drill in the deep sea for oil that we don't need and run the risk of destroying our most precious resource - the aquatic and terrestrial life of the Canterbury Coast.

Yours sincerely,

Kathleen Gallagher,  
on behalf of the River of Life Network, Otautahi Christchurch