

SUBMISSION TO EPA ON THE OMV GSB APPLICATION 9EEZ1000180.

Sir Alan Mark, FRSNZ. 30/7/19.

I am a Dunedin-born, semi-retired academic ecologist/environmental scientist, with research experience in a wide range of terrestrial ecosystems, but also involved as a Ministerial appointee to the Fiordland Fisheries and Marine Environment Committee and by the Government to the Fiordland Marine Guardians under the Fiordland Marine Protection Act (2005-13). Recognition has included a Fellowship of the Royal Society NZ, their Hutton Medal and Fleming Environmental Award; an Hon D.Sc. (University of Otago), a CBE and the KNZM (for my contribution to science-based conservation in New Zealand).

I Chair the Wise Response Society Inc., an Otago-based but New Zealand wide NGO, with a Mission Statement: "*As demand for growth exceeds earth's physical limits causing unprecedented risks, what knowledge and changes do we need to secure New Zealand's future wellbeing?*" The Society endorses this submission.

I have read and endorse the Greenpeace submission on this application.

The OMV application lacks essential detail, particularly the risks associated with the vessel to be used, the precise location in relation to the presence of particular ecosystems, rare and/or vulnerable, and the associated biodiversity, as well as the chemical(s) that are likely to be discharged, their toxicity and acidification potential, which could have cumulative effects. I accept the evidence of my Botany Dept colleague, Dr Linn Hoffman, retained by submitter Adam Currie, that ocean acidification can be invoked at this hearing since it is basically different from climate change, often referred to as its 'evil twin', and which is toxic to many marine organisms, particularly larval stages, and could also disrupt some marine ecosystems.

Neither has any information on the likely or possible economic cost : benefit been presented. In fact, the potential for a successful find is reported by the applicant as less than 30%.

But significantly, the possible environmental cost of recovering any gas and/or oil for use onshore is not presented and, most significantly, the environmental costs, in terms of greenhouse gas (GHG) emissions of its combustion is not discussed. Section 13(b) of the Environmental Protection Act, stipulates that the EPA must exercise its powers, functions and duties, conferred upon it by this and any other environmental act, including the RMA. The mediated version of the new Otago

Regional Policy Statement, which derives its legal authority from the RMA, stipulates that a precautionary approach must be taken to all resource use, a point that is not subject to any further appeal. I submit that the EPA must recognise the precautionary approach as having legal effect. We currently face the most serious environmental issue of all time; we have a climate emergency and a pending climate crisis, regionally, nationally and globally. I accept that issues related to climate change are excluded from this hearing but I must say that this situation is rather like being able to fight a fire but without the use of water! To ignore that this Government has committed to no further drilling for fossil fuels, and to a carbon-zero future is artificial. Such drilling in the South Basin (or anywhere off our coast) is anathema to the commitments New Zealand has made.

Since this application was lodged, Dunedin City Council has formally declared a Climate Emergency and, as our Dunedin Mayor stated just two weeks ago, that “Dunedin joins an increasing number of communities around the world who acknowledge that, without urgent action, ... there will be catastrophic environmental, health and economic impacts. To this end our City Council has already divested their shares in fossil fuel extraction companies and have consistently opposed deep-sea oil and gas exploration in recent years.” There has been widespread support for this action.

The Intergovernmental Panel on Climate Change’s report presented at COP24 demonstrates that humanity now has about 11 years to complete fundamental changes to the way we produce and consume energy. The UN Secretary-General noted that the majority of countries are already behind in their efforts to meet their Paris pledges. It is plain that mankind is way off course. We need more action and more ambition, without delay. It is not hyperbole to say that humanity faces an existential threat and we are not responding quickly enough.

I fear for the future of my children, grandchildren and great-grandchildren, and indeed all humanity, and also the many ecosystems essential to their welfare.

Finally, I repeat the opening statement of the very recent report of the Interim Climate Change Committee: “The need to reduce greenhouse gas emissions is becoming increasingly urgent.”

My submission is Firstly, to request OMV to seriously consider its moral responsibility and obligations to humanity, and withdraw its application but, failing that, Secondly, I strongly recommend, that the New Zealand Environmental

Protection Authority applies the Precautionary Principle to its decision and declines this application.