

Submission

To the

Ministry of Economic Development

On

“Comparative Review of Health, Safety and Environmental Legislation for Offshore Petroleum Operations (released in 14 December 2010)”

Introduction

1. Straterra Inc was formed in 2008 to be a collective voice for the New Zealand resource sector. Its membership represents 84% by value of New Zealand minerals production (excluding oil & gas, and geothermal), as well as exploration, research, service and support. Straterra works closely with the petroleum sector and has links to the geothermal sector.
2. Straterra welcomes the opportunity to provide feedback on the report by New Zealand law firm Atkins Holm Joseph Majurey and international consultancy Environmental Resource Management. We do so from the perspective that businesses operating in New Zealand’s marine jurisdiction, or considering investment in this region, may legitimately expect to be treated fairly, find clarity in legislation and regulations, and to find certainty of process and in the rules to be followed, or in the absence of that, certainty in being able to discover them. This is necessary for upholding the rule of law and promoting New Zealand’s attractiveness for investment.
3. Properly encouraged and managed, the resource sector’s contribution to the New Zealand economy could grow significantly. As a resource-rich country, and with new technologies and changing demands, New Zealand’s mineral and energy resources will afford economic opportunities for many decades to come. This is certainly the case for petroleum.
4. A report for Venture Taranaki and New Zealand Trade and Enterprise released in December 2010 estimated that the New Zealand oil and gas industry currently contributes directly \$1.9 billion a year to GDP and 3730 jobs. With the inclusion of the indirect component, the figures expand to \$2.5 billion and 7700 jobs.

Executive summary

5. Straterra welcomes the reviewers' report on health, safety and environmental (HSE) legislation for offshore petroleum operations. It provides a starting point for debate on better governance and management of New Zealand's marine jurisdiction (territorial sea, Exclusive Economic Zone and extended continental shelf) in respect of HSE, for petroleum, and more broadly.
6. We congratulate the reviewers on their identification of the issues, however, only partially support their recommendations for improvements (appendix 1). The concern is that the reviewers have taken an overly narrow approach.
7. In making alternative recommendations, Straterra has considered the broader policy context, in the belief this will lead to better outcomes for the petroleum sector and for New Zealand.
8. The call for more resourcing of the Department of Labour to exercise its health and safety (H&S) responsibilities is supported, as are calls for an improved safety-case approach to hazard and risk management, with the following caveat.
9. The foregoing are national issues applying to all industries, including petroleum. Rather than singling out the offshore petroleum sector for special attention, the real issue may be whether or not DOL and Maritime NZ are fit for purpose, in terms of exercising their respective H&S roles. A review of DOL, and possibly MNZ, may be a better way of addressing issues of funding, resourcing and structure, to achieve national benefits for H&S regulation and compliance in the work place. Within that, a transfer of H&S responsibilities from MNZ to DOL could be considered.
10. The call for better provision for insurance and liability cover is supported, subject to a separate public process to advance this issue.
11. The reviewers' proposal to bring HSE considerations into decision-making when allocating petroleum resources is fraught. Crown Minerals' purpose is to allocate Crown minerals, obtain a fair financial return on them, and encourage investment in the New Zealand resource sector. On land, H&S and environmental matters in respect of mining are considered separately (as is landowner permission). This is to avoid the unsatisfactory situation in which one agency is managing for mixed or competing objectives. The same logic would also apply to New Zealand's marine jurisdiction.
12. For the above reason, Strategic Environmental Assessments (SEAs) are ill suited as an input into decision-making on resource allocation, and also for the following reason.
13. Generally, it is preferable to consider applications to explore or mine at the project-specific level, in terms of H&S, and of environmental effects and their management. Indeed, it is only for specific proposals that adequate information on all of the values – economic, social and

environmental - will be available to inform decision-making. This reality is comprehended within the Resource Management Act 1991. Contrary to the reviewers' opinion, Straterra believes there is much in the RMA of application within New Zealand's broader marine jurisdiction.

14. The RMA also provides for the protection of areas for biodiversity, where deemed necessary. Provided a public process is followed, with provision for adaptive management of the effects of development, and provided the environmental effects of H&S related incidents are addressed in the H&S context, this is an appropriate approach.
15. For example, a zoning decision in which commercial fishing is ruled out to protect biodiversity may not need to exclude mining, if the effects of mining on biodiversity can be managed.
16. Straterra supports having one agency responsible for a new environmental management framework over New Zealand's marine jurisdiction. Maritime NZ would be a logical candidate, as the reviewers identified. Logically, MNZ would be supported in consenting and compliance by the new Environmental Protection Agency.
17. The proposal for the consolidation of New Zealand's marine legislation is also supported, provided resource allocation, H&S, and environmental matters continue to be administered by separate agencies. The Ministry for the Environment's current work in this area is noted.

Recommendations

18. Straterra has a number of recommendations for the Crown to consider, as feedback to the reviewers' report, grouped using the reviewers' recommendations (appendix 1) as sub-headings.

Rec 1: Investigate Funding Mechanisms and Resourcing Options

- a) Support the reviewers' proposal for more funding for and resourcing of the Department of Labour and Maritime NZ for H&S in the offshore petroleum sector, subject to (b);
- b) Propose a broader review of MNZ's and DOL's H&S functions, to achieve efficiencies in structure and operation at a national level;

Rec 2: Require HSE Consideration (including Strategic Environmental Assessment) at the Resource Allocation Stage

- c) Note the inappropriateness of bringing HSE considerations into decision-making at the resource allocation stage. Crown Minerals' purpose is, and should remain, other than HSE;
- d) Note that it is generally poor public policy practice for agencies to manage for mixed or competing regulatory objectives;

- e) Note that a Strategic Environment Assessment (SEA) would be ill suited as an input into resource allocation because it is unlikely that sufficient information on any or all values would be available to provide for robust decision-making on resource allocation;
- f) Propose that H&S, and environmental matters should be considered by the relevant agencies when making decisions on applications for petroleum development, at the specific project level;
- g) Propose that the risk of oil spill and other H&S related incidents should be addressed in the H&S, and liability and insurance contexts, and not in the resource allocation, spatial planning, or environmental consenting and compliance contexts;
- h) Propose that SEAs could be used in a spatial planning context, via public processes considering information on all of the values present, and with provision for adaptive management of effects;

Rec 3: Co-ordination of Regulatory Responsibility and Organisational Capabilities for H&S

- i) Support the reviewers' overall approach, subject to (j);
- j) Consider whether MNZ's H&S function for vessels and moving structures at sea should be transferred to DOL (refer to (b));

Rec. 4: Safety Case

- k) Support the "safety case" approach and the reviewers' proposals for improvement;
- l) Propose the accessing of international expertise to approve safety cases, where this expertise is lacking in New Zealand;

Rec. 5: Establish an Environmental Regulatory Framework in the EEZ and Extended Continental Shelf

- m) Note that MfE is working on draft legislation for the EEZ (and the ECS);
- n) Propose the application of the RMA, or relevant sections of the Act, to New Zealand's broader marine jurisdiction, e.g. each application is considered on its merits, and a balancing of social, economic and environmental interests is integral to decision-making;
- o) Note the RMA provides for protection of the marine environment for biodiversity where deemed necessary, and provides for spatial planning (refer to (h));
- p) Propose that MfE consider and analyse the applicability of the RMA to a new environmental regime for the EEZ and ECS, if it is not already doing so;

Rec. 6: Establish an Agency with Responsibility for Environmental Regulation in the EEZ and Extended Continental Shelf

- q) Support the proposal to assign to Maritime NZ responsibility for environmental regulation, within the EEZ and ECS, in lieu of territorial authorities, subject to (r);
- r) Support legislation to have the new EPA's consenting and compliance responsibilities apply also within the EEZ and ECS;

Rec. 7: Consider Insurance and Liability Arrangements

- s) Support the reviewers' proposal for government to investigate the adequacy of finance to cover mitigation of any serious incident, in terms of insurance and liability arrangements, subject to (t);
- t) Propose a public process to specifically address this issue;

Rec. 8: Consider Future Consolidation of Offshore Environmental Jurisdiction

- u) Note that MfE is actively considering draft legislation for the EEZ (and the ECS) and that consolidation of legislation is among the issues under consideration; and
- v) Propose considerations of resource allocation, H&S, and environmental issues not related to H&S, as separate matters, best administered by distinct agencies.

Discussion

Rec 1: Investigate Funding Mechanisms and Resourcing Options

19. The issue of resourcing and funding of DOL and of Maritime NZ in respect of H&S is not limited to petroleum. Submissions to a 2008 review carried out by DOL noted a shortage of inspectors for other types of mining (ref 1). DOL has identified other sectors of the economy, namely, construction, agriculture, manufacturing, forestry and fishing for review (ref 2).
20. On that basis, the funding and resourcing of agency responsibilities for H&S regulation may be a national issue, rather than one confined to offshore petroleum. If that is the case, there may be greater benefits for New Zealand if DOL's funding and resourcing were reviewed with a view to developing a fit-for-purpose structure for New Zealand. Maritime NZ could be included in such a review. The reviewers' proposal to seek petroleum industry contributions for cost recovery could be considered in this context.

Rec 2: Require HSE Consideration (including Strategic Environmental Assessment) at the Resource Allocation Stage

21. Crown Minerals is a business unit within the Ministry of Economic Development. It administers the Crown Minerals Act 1991 and the minerals programmes under the Act. Crown Minerals' purpose is the allocation of Crown mineral resources, to obtain a fair financial return to the Crown from those resources, and to maintain or improve New Zealand's attractiveness for investment in Crown minerals.
22. Crown Minerals should avoid taking on HSE responsibilities at the resource allocation stage. This is unnecessary. No company could exercise an exploration or mining permit if it lacked environmental consents or an approved hazard and risk management safety case. Nor would a company apply for a permit if it believed that H&S issues or environmental issues could not be managed adequately.
23. Straterra's view that agencies should not manage for mixed or competing objectives is discussed in paragraphs 47 and 48.
24. It would be inappropriate to bring Strategic Environmental Assessments (SEAs) into the resource allocation stage. There are several reasons for this. One is that it could lead to spatial planning for the environment occurring under the Crown minerals regime, which would be an inappropriate role for Crown Minerals. New Zealand already has an environmental planning regime under the Resource Management Act 1991, in which the Ministry for the Environment is the policy ministry, and the development and review of plans is the province of territorial authorities. This would be the appropriate model to roll out into New Zealand's broader marine jurisdiction. (The RMA currently applies in respect of the territorial sea but not the EEZ or ECS.) Indeed, these issues are already being explored by MfE (ref 3).
25. A second reason is that SEAs at the resource allocation stage could lead to environmental consenting via an inappropriate process. Again, New Zealand has a system, under the RMA, in which applications are made to territorial authorities. In the future this function could be transferred to the new Environmental Protection Agency. Here too is a model which could be rolled out into New Zealand's broader marine jurisdiction.
26. A third objection to SEAs at the resource allocation stage is that a proper consideration of environmental and economic issues would be unlikely to occur. Generally, sufficient information on any or all values is only available at the project-specific level. This is because of the expense of obtaining the information. There is a further issue to do with the different natures of the competing interests.

27. Baseline information is available for biodiversity but is not available for potential mines, for at least three reasons. It is difficult, expensive and time consuming to find mines; the economics of ore extraction changes over time; and it is unnecessary to find now all the mines humanity will need in the future.
28. Fourthly, the use of SEAs at the resource allocation stage could lead to an inappropriate process for addressing the risk of oil spills. This could occur, for example, during public consultation on a resource allocation proposal. As the reviewers observed, the major cause of oil spills and other environmental disasters rising from offshore petroleum development are H&S incidents. But this is not an argument in favour of bringing H&S issues into environmental management.
29. Rather, oil spills and similar incidents are a hazard and risk management issue, and should be dealt with in that context. There is a very good reason for this, and that is there is always the risk of an oil spill. Managed in an environmental framework, the future of offshore petroleum development would look bleak - the activity could be prohibited everywhere. Similarly, there is always the risk of an aeroplane crash. Yet, the planes keep flying. They can do so because they operate under a risk management framework. There is no suggestion of banning air travel to prevent all loss of life that could be caused by this form of transport. Of course, one seeks to minimise loss as much as possible.
30. Nonetheless, there is potentially a place for SEAs, which is the spatial planning context. Refer to paragraphs 40-42 for a discussion.

Rec 3: Co-ordination of Regulatory Responsibility and Organisational Capabilities for H&S

31. If Crown Minerals is not lumbered with unnecessary and inappropriate HSE responsibilities, the issue for co-ordination of H&S no longer arises.
32. That said, the reviewers raised the issue of DOL's responsibilities for stationary installations (e.g. oil rigs), and MNZ's for moving structures (e.g. vessels). A rig being towed through the EEZ into position would pass from one agency's responsibility to another's, a potential source of confusion and bureaucratic complexity. A case could be made for the MNZ function to pass to DOL but that leaves the issue of other types of moving vessel. The issue could be considered in the context of a broader review of DOL (and MNZ), as discussed in paragraphs 19 and 20.

Rec. 4: Safety Case

33. At issue with the safety-case approach is the question: how does the regulator determine whether a proposed safety case is good enough for managing risks and hazards. This can be a complex document, covering many areas of technical expertise.

34. The issue has arisen for other types of mining in New Zealand, as noted in submissions to a DOL review in 2008 entitled "Improving health and safety hazard management in the underground mining industry" (ref cited). Among issues raised were capability and capacity for H&S, both within the mining industry and the regulator. It is interesting to note the involvement of overseas experts, mainly from Australia, in analysis of the Pike River Coal tragedy.
35. The reviewers' proposals are sound but may not address the above issue fully. Straterra proposes that international advice could always be sought when signing off safety cases, if the expertise is lacking in New Zealand.

Rec. 5: Establish an Environmental Regulatory Framework in the EEZ and Extended Continental Shelf

36. In 2007 MfE issued a discussion document for consultation towards better environmental regulation of the EEZ (ref 4). It was proposed that the EEZ should be governed for: exploring, exploiting, conserving and managing living and non-living resources. Guiding principles for management included: greatest national benefit, sustainable management, safeguarding of ecosystems, and maximisation of opportunities for New Zealand.
37. With the change of government, work on the issue has been rekindled (ref cited). The Minister for the Environment, Hon Dr Nick Smith, has indicated draft legislation for the EEZ would be introduced into Parliament during 2011. Work on this is underway, led by MfE.
38. The reviewers expressed concern at extending the RMA, or legislation like it, into the EEZ and ECS, partly because New Zealand has jurisdiction over the EEZ rather than sovereignty. Surely, this is a red herring.
39. As a model for legislation, the RMA has attractive features. Each application for a resource consent is assessed on its merits. Economic, social and environmental factors are weighed in decision-making, as a basic principle of sustainable management. There is opportunity for public participation. There are provisions for appeal of decisions to a court. This is as it should be.
40. The RMA also provides for national policy statements to guide local authorities in developing and reviewing regional and district plans. The model could be adapted to provide for spatial planning in New Zealand's broader marine jurisdiction. This is a potential context for Strategic Environmental Assessments, with the following caveat.
41. Straterra views with concern calls to apply the "precautionary approach" (ref 5) when considering proposals for development. This could be interpreted to mean, perversely, that if information on the effects on biodiversity of development is lacking or incomplete, then development should not proceed. In the marine environment, information is generally a scarce commodity and certainly expensive and time consuming to obtain. On this basis, development

might never be approved. This would not square with the aims for the EEZ proposed in paragraph 36.

42. The alternative approach is “adaptive management” (ref 6), which amounts to learning by doing.

Rec. 6: Establish an Agency with Responsibility for Environmental Regulation in the EEZ and Extended Continental Shelf

43. The reviewers were concerned councils would be poorly positioned or resourced to administer an environmental regime within the EEZ and ECS. As well, the interests in this jurisdiction are both international and national, and extend more broadly than the interests of a local community, as MfE has pointed out (ref cited). The argument for central government direction is clear. The reviewers proposed that Maritime NZ could be resourced to take on this responsibility. We agree.

Rec. 7: Consider Insurance and Liability Arrangements

44. A common concern is that financial arrangements in New Zealand are sufficient to address only a small, near-shore oil spill. As matters stand, an incident of the scale of the April 2010 Deepwater Horizon spill in the Gulf of Mexico would fall outside of New Zealand’s ability to deal with it. Given this disaster was one of the drivers for this review, the issues of insurance and liability must lie at its core.

45. The above argues for a separate process targeting this issue.

Rec. 8: Consider Future Consolidation of Offshore Environmental Jurisdiction

46. MfE’s role in developing draft legislation for the EEZ (and the ECS) has been noted, and consolidation is among issues under investigation (ref cited). According to MfE, there are 18 laws, 14 agencies, six government strategies, and 13 international conventions applying to New Zealand’s EEZ.

47. Consolidation of legislation is one matter; consolidation of agency responsibilities is another. We believe that agencies should, ideally, not be placed in the position of managing for mixed or competing objectives. The classic case, historically, is the New Zealand Forest Service and the Department of Lands and Survey, superseded by the Department of Conservation, and other agencies and SOEs in the late 1980s (ref 7).

48. The NZFS was both protecting and logging native forests, and Lands and Survey was both protecting land and burning it for development. The results were inefficiencies and perverse outcomes. DOC was created in part to eliminate these (ref 8).

References

1. Department of Labour 2008, "Improving health and safety hazard management in the underground mining industry". <http://www.dol.govt.nz/consultation/underground-mining/index.asp>
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4. Ministry for the Environment 2007, "Improving the regulation of environmental effects in New Zealand's Exclusive Economic Zone". <http://www.mfe.govt.nz/publications/oceans/nz-exclusive-economic-zone-discussion-paper-aug07/nz-exclusive-economic-zone-discussion-paper-aug07.pdf>
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7. Department of Conservation 2007, A short history of DOC. <http://www.doc.govt.nz/publications/about-doc/a-short-history-of-doc/born-with-a-mission/>
8. David Young 2004, "Our Islands, Ourselves: A History Of Conservation In New Zealand", ISBN 1 877276 94 4

Appendix 1: Reviewers' recommendations

Rec. 1: Investigate Funding Mechanisms and Resourcing Options

Government to investigate, as a matter of priority, options for cost recovery and the provision of other additional sources of funding to ensure greater technical expertise, organisational capability (including training) and funding (including cost recovery mechanisms) are available to DOL and MNZ to fulfil their existing regulatory functions with respect to HSE approvals, monitoring and compliance. At the same time, DOL and MNZ to identify expanded opportunities for interagency co-operation, co-ordination and sharing of expertise and resources, within and outside New Zealand including the National Offshore Petroleum Safety Authority in Australia. Commissioning of these investigations will not require legislative change in New Zealand. However, implementing any amendments proposed as a result of the investigations may require amendment of the *Health and Safety in Employment (Petroleum Exploration and Extraction) Regulations 1999* and *Maritime Transport Act 1994*. Cooperation with international agencies, such as the National Offshore Petroleum Safety Agency in Australia, may involve legislative changes to Australian legislation.

Rec. 2: Require HSE Consideration (including Strategic Environmental Assessment) at the Resource Allocation Stage

Prior to decisions by MED (Crown Minerals) to allocate petroleum permits (prospecting, exploration and mining) there be a new legal requirement on an applicant to provide appropriate information on relevant HSE issues. The level of information required from an applicant by MED (Crown Minerals) will need to be defined by reference to the potential health and safety (particularly process safety) issues as well as specific environmental concerns and the nature and scale of the proposed permit activities (e.g. prospecting or mining). For environmental issues a Strategic Environmental Assessment should be able to be required or commissioned by MED (Crown Minerals) for review by relevant expert agencies such as MfE and MNZ. This change will require specific legislative amendment to the *Crown Minerals Act 1991*. MED (Crown Minerals) be legally empowered to consider such information, following independent review and reporting by relevant regulatory agencies – in particular MNZ, DOL, Regional Councils and MfE, as part of the overall decision to grant/refuse a petroleum permit or as a basis for imposing conditions on the permit in relation to HSE issues. For example this may include a condition that a further more detailed HSE risk evaluation of specific high risk issues be undertaken or a more comprehensive EIA be provided.

3 Co-ordination of Regulatory Responsibility and Organisational Capabilities for Health and Safety

DOL to continue to have lead regulatory responsibility with respect to health and safety (including process safety) approvals, monitoring and enforcement. However, it is also recommended that an urgent interagency review be undertaken (led by DOL) of ways in which regulatory co-ordination and organisational capability to monitor and enforce health and safety can be further strengthened and improved. This includes consideration of interagency co-ordination, and funding issues noted in recommendation 4.2.1 above. The review should consider the resource viability and risk management benefits that could be accrued through the creation of a specialised distinct unit within DOL, focused on offshore oil and gas process health and safety management. Such a unit would align with practices in the other regimes studied and allow for the development of specialist technical expertise which will be required to manage process health and safety for the offshore petroleum sector. The establishment of such a unit would require expansion of existing organisational capability and the inspectorate, as well as specific funding (for example through greater cost recovery or a targeted levy). While the review itself will not require specific legislative change, the

implementation of any amendments arising from that review may require a change to the relevant empowering legislation.

4 Safety Case

Maintain the current regulatory approach in relation to the Safety Case. However, in addition, DOL should investigate ways in which the regulatory consideration of individual Safety Cases might be enhanced or improved including: (a) Requiring operators to provide independent third party verification of the Safety Case prior to submission of the Safety Case to DOL; (b) Expanding DOL's existing review process to include an ability to require specific regulatory approvals (or verifications) of a Safety Case/ aspects of a Safety Case in appropriate circumstances; (c) Improving co-ordination with other relevant agencies during Safety Case reviews, monitoring or inspection processes; (d) Improving the existing Safety Case process by the provision of supplementary or additional prescriptive requirements in specific technical areas; (e) Improving the monitoring and inspection regime to ensure operator compliance and performance. The above will require specific consideration of the provisions of the *Health and Safety in Employment (Petroleum Exploration and Extraction) Regulations 1999*.

5 Establish an Environmental Regulatory Framework in the EEZ and Extended Continental Shelf

Establish a new regulatory framework for environmental assessment and approval of petroleum activities in the EEZ and extended continental shelf. This new process should not aim to replicate the complexity of the RMA processes and procedures within the EEZ and extended continental shelf (ECS) for the reasons noted earlier. Initially, a process of EIA which includes opportunities for public comment and submissions in relation to major projects – especially mining – should be established. Responsibility for the administration of this new framework is discussed in the next recommendation. Implementing this recommendation would require the introduction of new legislation.

6 Establish an Agency with Responsibility for Environmental Regulation in the EEZ and Extended Continental Shelf

Establish a regulatory agency with central co-ordinating responsibility for environmental assessment, monitoring and enforcement within the EEZ and extended continental shelf. Given MNZ's existing maritime and marine pollution roles, the logical initial choice would appear to be MNZ. Clearly the final choice depends on other government decisions in respect of regulating other marine development activities (e.g. seabed mining, offshore aquaculture etc) and decisions as to the future role of the new EPA. MNZ already performs an environmental management role in the EEZ and extended continental shelf area given its responsibilities for marine pollution, marine dumping and approval of marine discharge management plans from petroleum installations. It also has regulatory expertise and responsibilities in relation to shipping and a role in administering the New Zealand Oil Pollution Response Strategy. To perform such an extended task, an extension of the current statutory role of MNZ would be required, and the need for additional expertise, resources and organisational capability would need to have been investigated as a matter of priority. MNZ should be required to closely co-operate with relevant Regional Councils, MfE and the EPA to ensure the best use of available environmental expertise, and that sufficient expertise and resources are available for the broader environmental assessment and compliance monitoring role.

Implementing this recommendation would form part of the new legislation for environmental regulation of the EEZ and extended continental shelf.

7 Consider Insurance and Liability Arrangements

Government to investigate the adequacy of the current minimum insurance levels and determine whether these require adjustment. Government also to investigate whether there are any existing international conventions which would strengthen insurance and liability arrangements in relation to offshore petroleum activities. In relation to ships, Government should consider ratifying the Bunkers Convention, Supplementary Fund Protocol 2003 and the LLMC Protocol. Government should also consider giving priority to the review of new international instruments relating to marine pollution and liability issues. While giving priority to the review of such instruments is unlikely to require a legislative change, incorporating the provisions of any new ratified instruments into domestic legislation will.

8 Consider Future Consolidation of Offshore Environmental Jurisdiction

MfE to undertake a review of the regulatory advantages and disadvantages of combining jurisdiction for environmental regulation within the territorial sea and EEZ/extended continental shelf into a single regulatory agency. Such an agency would work closely with Regional Councils, HSE regulatory agencies and other bodies with marine pollution or environmental roles and responsibilities (such as Biosecurity New Zealand, the Oil Pollution Advisory Committee etc). The review would not require legislative change. However giving effect to any consolidation proposal would require, at the minimum, amendment of the *Resource Management Act 1991* and any legislation introduced for the EEZ and extended continental shelf.