Climate Justice Taranaki Submission on Ministry of Business, Innovation and Employment — *Enabling Investment in Offshore Renewable Energy*, December 2022

6 April 2023

Introduction

1. Climate Justice Taranaki Inc. Soc. (CJT)[1] is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will increasingly impact present and future generations' inalienable rights to safe water, food and shelter, crucial to sustaining livelihoods and quality of life. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions. Many of our points raised in previous submissions have proven accurate.

2. Our comments and inputs into the discussion document[2] "*Enabling Investment in Offshore Renewable Energy*" are built strongly on our experience dealing with the energy sector and from our involvement in the Resource Management Act (RMA) and Exclusive Economic Zone and Continental Shelf Act (EEZ Act) consenting processes.

Our Key Points

3. We are not opposed to clean renewable energy *per se*, but we are most concerned about four aspects of the present consultation; the rationale, the apparent rush, the legislative settings and the potential scale. There are problematic similarities to the 'Think Big' era that caused or contributed to so many of today's impacts, from water quality and emissions to environmental and social degradation – the same thinking that created the mess we are presently in. To bring some perspective, humanity is in severe ecological overshoot; multiple planetary boundaries have been breached, resulting in climate chaos, loss of ecological integrity and extreme social inequality. **We cannot continue to increase energy supply and material consumption, with consequential emissions, to enable economic growth which ignores planetary boundaries, biophysical limits and the resulting environmental and social harm here and abroad[3]**. It is irresponsible and short-sighted to enable the production of surplus offshore renewable energy "*to grow energy-intensive activities such as the construction of data centres and the production of hydrogen or ammonia*" for export or domestically for industrial agriculture[a] and other industries (Executive summary of the discussion document).

4. Around the same time as the release of the discussion document (21 Dec 22) by the Ministry for Business, Innovation and Employment (MBIE), the Parliamentary Commissioner for the Environment wrote to Minister Megan Woods (20 Dec 22)[4]:

   "*There are several large energy projects actively being considered by the Government and the private sector. These projects contain potentially too many competing claims over too few resources for each of these different projects to be considered in isolation from the rest of the energy system.*

   The system-wide impacts of these different options and how they interact with each other must be fully understood before decisions to progress them are made. ***Any proposals that have consequences for the entire system should be included in the scope for the energy strategy and progress halted until the whole-of-system analysis is completed****."*

[a] The use of so-called 'green ammonia' to make urea for industrial agriculture would result in similar nitrous oxide emissions and nitrate contamination of groundwater as urea derived from fossil gas. The global warming potential of nitrous oxide is 310 times that of carbon dioxide over a 100-year period.

5. Offshore wind is listed as one of those large energy projects by the Commissioner, as is the associated green hydrogen production for export on which the Commissioner has also raised serious concerns to the government[5]. It is therefore only prudent for MBIE to concentrate on the formulation of a comprehensive, system-wide Energy Strategy, rather than rushing into making regulatory settings aimed at "*enabling investments in offshore renewable energy*" in isolation. The strategy should answer key questions such as how to urgently reduce our fossil fuel energy use, decarbonise, half our emissions by 2030[6] and adapt to climate disruptions[7]. As an example, the French government has embarked on an energy savings plan since October last year, aimed at cutting its energy consumption 10% by 2024[8].

6. Moreover, **the Energy Strategy and any major energy development should be consistent with the Natural and Built Environment Act, Spatial Planning Act and any regional plans and strategies that follow**, as we explained in our recent submission[9]. Note however that the Spatial Planning Act would need to be expanded to deal with spatial planning needs in the EEZ and continental shelf.

7. Why are we rushing? The document states that "*our wind farms can produce more energy per unit than the global average. The least-windy sites in Aotearoa New Zealand have better wind energy potential than the windiest sites in Australia.*" If this is correct, and there is a strong economic case, investers will line up for NZ's wind and we don't need to worry about not remaining "*competitive*". Moreover, **this heavy emphasis on offshore investment fails to take into account the extremely fragile state of the present global economy**, in terms of growing bank failures[10, 11], supply chain problems[12, 13] and fuel shortages[14] in part linked to geopolitical unrest.

8. Our focus should be on how to end fossil fuel reliance, reduce overal energy demand equitably and decarbonise effectively. Critically, **we do not want to cause additional environmental problems or squander renewable energy resources when there are more efficient ways of harnessing them**; e.g. electric heat pumps[15] to heat buildings rather than hydrogen which would require three and a half times more renewable energy[16]. Developers can wait while a robust system-wide Energy Strategy and regulatory framework is developed. The current process, fanned by successive gatherings largely sponsored by the industry, facilitated by MBIE and its push for enabling regulations is foolish, likened to "*the tail wagging the dog*".

9. Recent government actions are at odds, indeed directly counter to, rapid decarbonisation or climate action. These include issuance of a new petroleum exploration permit off the coast of Taranaki[17] and opening of yet another block offer spanning 1565 sq.km. of Taranaki land to bidders[18]. EPA has also just granted consents for further drilling and discharge of contaminants at the Kupe field in the EEZ[19].These, in the midst of a climate emergency that has arleady wreaked havoc, causing dealth and environmental destruction across Aotearoa. We await the forthcoming decision by the International Court of Justice on governmental responsibilities in these regards[20].

International obligations and objectives of regulatory settings

10. New Zealand is not only party to the United Nations Convention on the Law of the Sea (UNCLOS)[21]. We are also a signatory to the UN Convention for Biological Diversity (CBD)[22], Convention on Conservation of Migratory Species (CMS)[23], Agreement on the Conservation of Albatrosses and Petrels (ACAP)[24], East Asian – Australasian Flyway Partnership (EEAFP)[25] and Memorandum of Understanding on the Conservation of Migratory Sharks[26], all of which are relevant to offshore renewable energy development. Last year at the UN Biodiversity Conference (COP15), New Zealand along with other signatory nations, agreed to protect 30 per cent of the planet's lands, inland waters, as well as marine and coastal areas, by the end of 2030[27]. To put it in context, only 0.5% of NZ's seas falls within designated marine protected areas. In March this year, at the Intergovernmental Conference on Marine Biodiversity of Areas Beyond National Jurisdiction (BBNJ), we also agreed to the so-called High Seas Treaty to protect marine biodiversity in international waters[28]. (Q1 & 2)

11. The regulatory settings of offshore renewable energy development must therefore put safeguarding the environment and biodiversity as top priority, because of our international obligations, and because we depend on a healthy coastal and marine environment to sustain the cultural wellbeing of Māori, customary and commercial fisheries[29], as well as buffering climate change impacts so that we will have a liveable future for all. Hence, sites for the major expansion of the marine protected areas network should be considered prior to those for wind farm proposals. (Q1 & 2)

12. The listed objectives of regulatory settings include "*appropriate safeguards and benefits for the environment*" as a tag-on, rather than giving it the weighting it deserves. The other objectives, notably to "*provide certainty for developers...*" and "*ensure New Zealand remains competitive and can secure access to offshore renewable energy technology in a timely way*", should be of much lower weighting. Offshore renewable energy technologies are evolving fast, so it is possible that a later adopter would benefit from better technologies with a greater efficiency and fewer environmental impacts. (Q1-5)

13. The discussion document consults on just two points: "*implementing a permitting or collaborative approach to the production of feasibility assessments...*" and "*gathering more information about existing rights and uses*..." These are missing key points, notably the lack of environment, species and ecosystems data and how to address this, the use of spatial planning[30], alternatives, and full life-cycle analyses, if we are to be a responsible nation. (Q2-4)

14. Full life cycle analyses would meticulously examine the environmental impacts of all steps in such systems over their entire lifetime, from construction, operation and maintenance, to decommissioning, the latter could involve recycling, incineration and landfill disposal[31]. The construction phase, in particular, would result in significant amount of CO_2 emissions and energy consumption in the production and transport of all materials used, notaby steel, concrete, aluminium, fibreglass, copper and lubricants, etc[32] and the installation of the system. All these need to be considered thoroughly before jumping into conclusion that offshore wind development is the go. (Q4)

15. In addition to the RMA and the EEZ Act, the Wildlife Act 1953, Conservation Act 1987, Marine Mammal Protection Act 1978, Marine Reserve Act 1971, NZ Coastal Policy Statement 2010[33] and Te Mana o te Taiao / Aotearoa NZ Biodiversity Strategy 2020[34] are also relevant and should be considered. (Q4)

Inadequate scientific data warrants precaution, not 'open door' approach

16. It is clear from various NZ offshore renewable energy gatherings that we do not have adequate environmental and species data to conduct robust impact assessment. In the Ara Ake Offshore Renewable Energy Forum (8-9 March 2023)[35], the Department of Conservation (DOC) pointed out "*a lack of current data on species and habitats... Time needed to gather knowledge and baseline data... accurate risk calculation relies on adequate data and understanding of the species... Limited ability to mitigate or offset... The scale of proposals is likely to have non-linear impacts... Risk of first application being lodged prematurely and leading to complex and contentious consent process...*"

17. It is also acknowledged by environmental consultants that we cannot simply borrow information from overseas because of the numerous marine species here, exceptionally high levels of endemism, and large numbers of threatened and migratory species, notably seabirds and marine mammals. Benthic data are also scarce. For example, a recent NIWA study[36] in the South Taranaki Bight revealed previously unknown reefs "*associated with extensive areas of important biogenic habitat and abundant reef fish assemblages"*. Research and experience from overseas revealed a wide range of impacts from feasibility stage to construction, operation, maintenance and decommissioning of offshore wind development; including collision and displacement of birds, underwater noise affecting marine mammals[37], invertebrates[38] and ecosystems[39], turbulent wakes affecting benthic communities[40], and more.

18. In such a context, we cannot support the proposed "*developer-led*" approach or "*open door*" policy "*where government plays a limited role by inviting developers*" to conduct studies and identify areas for renewable energy development, as is being done in Denmark. In addition to the necessary considerations raised earlier, the NZ government should invest in the Department of Conservation and academic research institutions so that they are able to conduct comprehensive baseline surveys and research to collect environmental, species and ecological data, independent of developers. It is important that Māori are well supported to provide mātauranga Māori assessments, cultural values and socio-economic considerations. Emerging threats, notably marine heat waves, changing ocean chemistry and the cumulative effects on top of existing ones such as fishing pressure and maritime traffic, all need to be considered. (Q6, Q7)

19. Together, these can be used to potentially draw up spatial plans incorporating **'no go' zones based on the precautionary principle**, thus providing clear boundaries and limits for where feasibility studies may be worthwhile for developers, and avoiding unneccesary resources on developers, regulators, Māori and the wider community. The research would also help inform environmental impact assessments independent of commercial interest, and provide base-lines for long-term monitoring. Indeed such research and spatial planning is especially important in the EEZ where they are most lacking, and where most offshore renewable energy interest appears to be. (Q8)

20. Given that we do not agree with the "developer-led" approach, we do not support either option 1 - the issuance of feasibility permits with sole rights to apply for construction and operation permits'; or 2 – collaboration among developers, the Crown and Māori to develop feasibility studies. (Q9-10)

21. If a collaborative approach is to be undertaken, then **the role of developers should be minimal and comes much later, to ensure that the process is driven by the need for decarbonisation, energy equity[41] and resilience[42] while allowing for energy descent[43]. The process must also be grounded in science and Te Tiriti o Waitangi, rather than driven by profits and neoliberal agendas**. (Q11)

22. There are numerous other drawbacks in option 1, as has been revealed in the petroleum sector. The nearly guaranteed right to progress to a mining permit, following prospecting and exploration, has meant that authorities, whether it's the EPA or local councils, had never objected to a consent application from an oil and gas company. This, despite escalating threats (over the decades-long consent duration) from climate breakdown to changing ocean chemistry and imminent extinction of a critically endangered species like the Māui dolphin. Moreover, the freedom to farm out or on-sell existing license and pass on consents to companies and operators that were not initially assessed, makes it impossible to guarantee quality delivery and control while making it easy to evade responsibilities (Q12, Q20)

Māori involvement

23. The Alternative Energy Position Statement by Te Korowai o Ngāruahine Trust[44] provides the basis on the values and expectations of Ngāruahine in regards to alternative energy development. MBIE needs to seek and respect the views and expectations of the individual Māori groupings potentially affected by offshore renewable energy development. MBIE also needs to respect and incorporate multiple relationships of overlapping mana whenua and mana moana without unfair time restrictions or bias. And all Māori parties need to be provided unbiased full disclosure and any other relevant information from the crown, developers and independent researchers, in a timely manner. We are a nation finally moving towards co-governance. For far too long, Māori have been marginalised, oppressed and exploited. Undefined 'consultation' and 'consideration' of Māori views and the gathering of their mātauranga needs to be a thing of the past. Māori must be allowed the authority to protect their taonga, communities and tino rangatiratanga as agreed by the crown in Te Tiriti o Waitangi. (Q13-17)

Considerations for a permitting framework

24. As expressed above, we do not support a permitting framework at the feasibility stage. However, if it is adopted, then a much wider list of considerations is needed beyond what's listed under the sections on technical, financial and commercial capability. Firstly, core interests of Aotearoa New Zealand must include energy decarbonisation, equity and resilience. How much would an applicant's proposal contribute to these? Will it actually make energy more affordable for households, considering the very high capital costs? As an example, Ngāruahine requires from developers that a 'social return on investment' be included in any project cost and benefit analysis. (Q19)

25. The willingness and ability of an applicant to respect and work closely with mana moana as introduced in chapter 5 also need to be a key consideration, as does the commitment and ability to fund and support independent research, understand and protect the environment and species throughout the project. In the recent offshore renewable energy forum, DOC advised developers to ensure biodiversity is considered at the front end, share site specific and broader data, and undertake research to understand risk and minimise impact. We do not, however, support developer-led research, given the numerous examples of such reports favouring development with serious failures in objectivity and ignorance of the Precautionary Principle. Indeed it is axiomatic that developer-led research will result in a favourable report that underplays that negatives and overplays the positive. Independence of research is essential. (Q19)

26. Under technical capability, considerations should also be made as to whether the technology is home-grown and the materials can be sourced in New Zealand rather than from overseas. Full life-cycle analyses as well as 'energy return on energy investment' calculations should be provided taking into account all embeded emissions, energy inputs and environmental impacts from pre-construction to decommissioning. (Q19)

27. Much more stringent requirements are needed in relation to material changes to ownership, with the ability to revoke permits, than have been for petroleum permit holders. (Q20)

28. We agree that a feasibility licence should be subject to 'use-it or lose-it' provisions, with permits not exercised within 12-months lapsing and without the privilege to extend permit duration. (Q22)

29. Overlapping applications would have been avoided with a collaborative rather than permitting system, as suggested earlier. Resources for baseline research and collection of environmental, ecological and species information would also be optimised with a collaborative approach (See our points 18-21 earlier). (Q23)

Renewable energy for climate justice, not economic growth

30. As expressed above, we are concerned about the rationale — renewable energy development should be driven by **the need for decarbonisation, energy equity and resilience while allowing for energy descent**[45]. In reality, renewable energies cannot replace all the calorically dense fossil fuel energies to maintain the current level of economic activity, let alone growth. Moreover, to achieve the goal of industrial scale transition away from fossil fuels, there will be an unprecedented demand for minerals[46]. Most of the minerals required have not been mined in bulk quantities before while many of the technology metals are facing mining supply risks[47] and criticism of unethical mining. **Energy descent is essential in allowing degrowth**[48] which was acknowledged by the IPCC AR6 WGIII report 2022 for the first time[49]. We need to use less energy and materials, not more – even if its made with so-called renewable technology[50]. The Transition Engineers' 100 year 'crash' test is a useful way to visualise and select future scenarios, potential pathways and triggers for change[51].

31. **Adequate, affordable, clean energy should be provided for households as a public service**. It should not be a business commodity requiring new markets to be created, such as for export, to make profits and drive economic growth. A great deal of care is required to assess energy development proposals, and only where appropriate, proceed under the most stringent regulations to minimize environmental and social harm[52, 53, 54].

32. As such, we do not agree that offshore renewable energy development should fall under the responsibility of MBIE, and decisions be made solely by the Minister of Energy and Resources with advice from officials. The Ministry for the Environment, Department of Conservation and Minister for Climate Change should also play key roles in assessing applications and making final decisions, with advice from mana moana and independent experts. (Q24, 25)

33. We agree that applications should be open to public submissions. (Q28)

34. Permit-holders should report on the progress of their feasibility activities annually, and the reports should be made publicly accessible. (Q29, 31)

35. Of course, any developers not complying with obligations or found to have breached permit conditions should be dealt with, involving potentially the loss of rights. Any complaints from mana moana, local communities, other marine users, councils or government agencies should also be considered seriously. (Q32)

Missing information on threatened, taonga and migratory species

36. The list of environmental values (page 29) and the maps in Annex 5 are missing information concerning threatened and migratory species (e.g. EAAFP flyway network sites Farewell Spit and Awarua Bay-New River Estuary)[55], their feeding routes (e.g. Little penguin)[56], breeding and nursery grounds (e.g. Pygmy Blue whale in the South Taranaki Bight[57]) or migratory routes (e.g. Important Bird Areas for Seabirds[58]). Information on taonga species of special value to mana moana is also missing or not presented. Such information is extremely important for considering, refusing, planning and management of any development which would add new pressure to species that are already suffering from multiple human-induced stresses like overfishing[59], pollution[60], oil and gas activities, ocean acidification, marine heat waves[61] and the associated loss of prey[62, 63]. (Q33)

37. As introduced above, our recent government commitment to major expansion of marine protected areas at UNCBD COP15, along with many other existing commitments, notably the conservation and recovery of threatened species under that and other treaties, should hold precedence, excluding development from such important areas. Sites of special cultural significance to mana moana may also be excluded. It must be noted that three iwi with mana moana over regions from Waikato to southern Taranaki, currently being sought by developers, have called for rāhui on kaimoana due to unsustainable mismanagement by legal authorities. One iwi has just been granted a two-year ban under section 186a of the Fisheries Act[64] and a second iwi is waiting for theirs. (Q34)

38. We do not support the large, industrial scaled proposals that are being touted to enable hydrogen[65] or ammonia production for export or fertilizer manufacturing locally, or to support marine data centres. There may be a role in small-scaled offshore renewable energy developments, such as wave or wind to serve local microgrids[66] for remote communities. (Q35)

39. Cumulative effects are difficult to assess or map, yet critical to sound decision making. All development proposals to date in the EEZ have failed to adequately address cumulative effects, notably of the rapidly changing oceanic regime, driven by large-scale climate forcings and teleconnections[b]; physical,

[b] Effects on ENSO, Indian Ocean Dipole, Pacific Decadal Oscillation

chemical and biological oceanography[c]; and their impacts on food webs. Ecosystem collapse is not just a technical term gaining increasing traction among ecologists. It is also a looming reality for our coasts and oceans, harbingers being kelp forests and krill. (Q38)

40. Culturally, Taranaki iwi have a unique relationship with Tangaroa, as some stories speak of Tangaroa being the separator of Papatūānuku and Ranginui. This is the natural way Māori and many Pacific islanders view the world, with the sea lying between the land and sky. With hundreds of giant wind turbines additional to the existing oil and gas well platforms, supply vessels and commercial and recreational ships off this coastline, that relationship with Tangaroa will be far more impacted than now.

Synergy not compromise, systemic transformation not business as usual

41. With the severe constraints in resources and time for energy transition to avoid the worst of climate catastrophes and irreversible losses (IPCC, 2023)[67, 68], we need to be extremely cautious and prudent. Invest in programmes and developments that offer synergies or co-benefits, rather than necessitate compromises and trade-offs. For example, investments in energy efficient, healthy homes for public housing, connected by efficient public and active transport and community renewable energy grids and storage, would create multiple environmental and social co-benefits. On the contrary, large offshore wind development especially to support profit-driven export industries, would cause unacceptable environmental harm, perpetuate unsustainable economic growth, albeit cloaked in a shade of greenwash, with no guarantee that it'd benefit the wellbeing of local communities.

42. As an environmental justice society, we believe that rather than promoting another 'Think Big' program focused on foreign investments and export markets, the government should dedicate much greater resources and efforts into food, water and energy efficiency and resilience, adequate housing, health care and education for all New Zealanders, especially those who are most vulnerable. Transform the tax system to squash inequality. Invest in the care economy and in nature. Support Pacific Island countries most affected by climate change where needed.

43. In February, the UN Secretary General delivered a sobering briefing to the General Assembly on prioities for 2023, in which he said[69]:

    "*We have an obligation to act – in deep and systemic ways.*
    After all, the world is not moving incrementally.
    Technology is not moving incrementally.
    Climate destruction is not moving incrementally.
    We cannot move incrementally.
    This is not a time for tinkering. It is a time for transformation."

    Indeed, it is time for systemic transformation from an extractive, exploitive global economic machine to a regenerative and socially just world of communities where people and the environment flourish together. Our Toitū Taranaki 2030 community strategy[70] offers essential pathways to achieve this.

[c] Changing ocean currents, marine heatwaves, storms, acidification and deoxygenation

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