

19 June 2020

Submission on the COVID-19 Recovery (Fast-track Consenting) Bill

Environment Committee
Submitted online

PEPANZ Submission: COVID-19 Recovery (Fast-track Consenting) Bill

Introduction

1. The Petroleum Exploration and Production Association of New Zealand ("PEPANZ") represents private sector companies holding petroleum exploration and mining permits, service companies and individuals working in the upstream petroleum industry.
2. This document constitutes PEPANZ's submission to the Environment Committee on the COVID-19 Recovery (Fast-track Consenting) Bill.

Submission

3. We generally support the intent of the Bill, which is to enable temporary fast-tracking of the consenting for infrastructure projects as part of the COVID-related economic recovery.
4. We have not had time to review the specific projects or the legislation in detail due to the exceptionally short consultation period.
5. We have two concerns with this Bill, an over-arching matter, and a matter of detail:
 - a. The fact that special legislation is needed to get projects going highlights the significant barriers to development imposed by the RMA. Government and the resource management community and stakeholders need to continue work to reduce unreasonable barriers to development. The fact that numerous 'shovel-ready' projects have sat undeveloped and need to be consented through special legislation raises some important questions about the legislative settings that we operate under.
 - b. The decision-making criteria are concerning. These signal a shift away a balanced approach, and allow projects to be approved on the basis of novel 'public benefit' tests hinging on a single consideration (such as "efforts to mitigate climate change and transition more quickly to a low-emissions economy"). A broad judgement is more likely to result in well-considered and robust decisions and we recommend the committee consider amendments to ensure balance.
6. Finally, it is worthwhile noting that infrastructure projects often rely on wider or complex supply chains to provide the necessary goods and services inputs. It would be disappointing if the 'shovel ready' projects lucky enough to be chosen fail to get delivered because the consenting process for their inputs contain barriers preventing the timely delivery of these, and compromise the ability for the main project to be executed.

ENDS.