


Proposed National Policy Statement Freshwater Management – Oil Industry Environmental Working Group (OIEWG)



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Introduction

- **This presentation is an overview of the key concerns and outcomes OIEWG seek in relation to a NPS on Freshwater Management.**
- **OIEWG's role and interest.**
- **Oil Companies have national networks and primarily water quality interests relating to stormwater and contaminated land management.**
- **No interest in water allocation except for how groundwater resources are defined.**



OIEWG Guidelines:

- **“Guidelines for Assessing & Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand (MfE 1999)”**,
- **“Above-Ground Bulk Tank Containment Systems - Environmental Guidelines for the Petroleum Marketing Oil Companies (MfE 1995)”**
- **“Environmental Guidelines for Water Discharges from Petroleum Industry Sites in New Zealand (MfE 1998)”**.



Key Concerns

- **Generic nature of policy**
- **Recognition of industry codes of practice/guidelines**
- **No degradation objective**
- **Duplication of functions**
- **Degraded water resources**



Generic Nature of NPS

- **Lack of certainty**
- **Variability in interpretation**
- **Unintended consequences e.g. groundwater. Evidence of Wayne Russell. Inclusion of contaminated land**



Recognition of Industry Codes of Practice

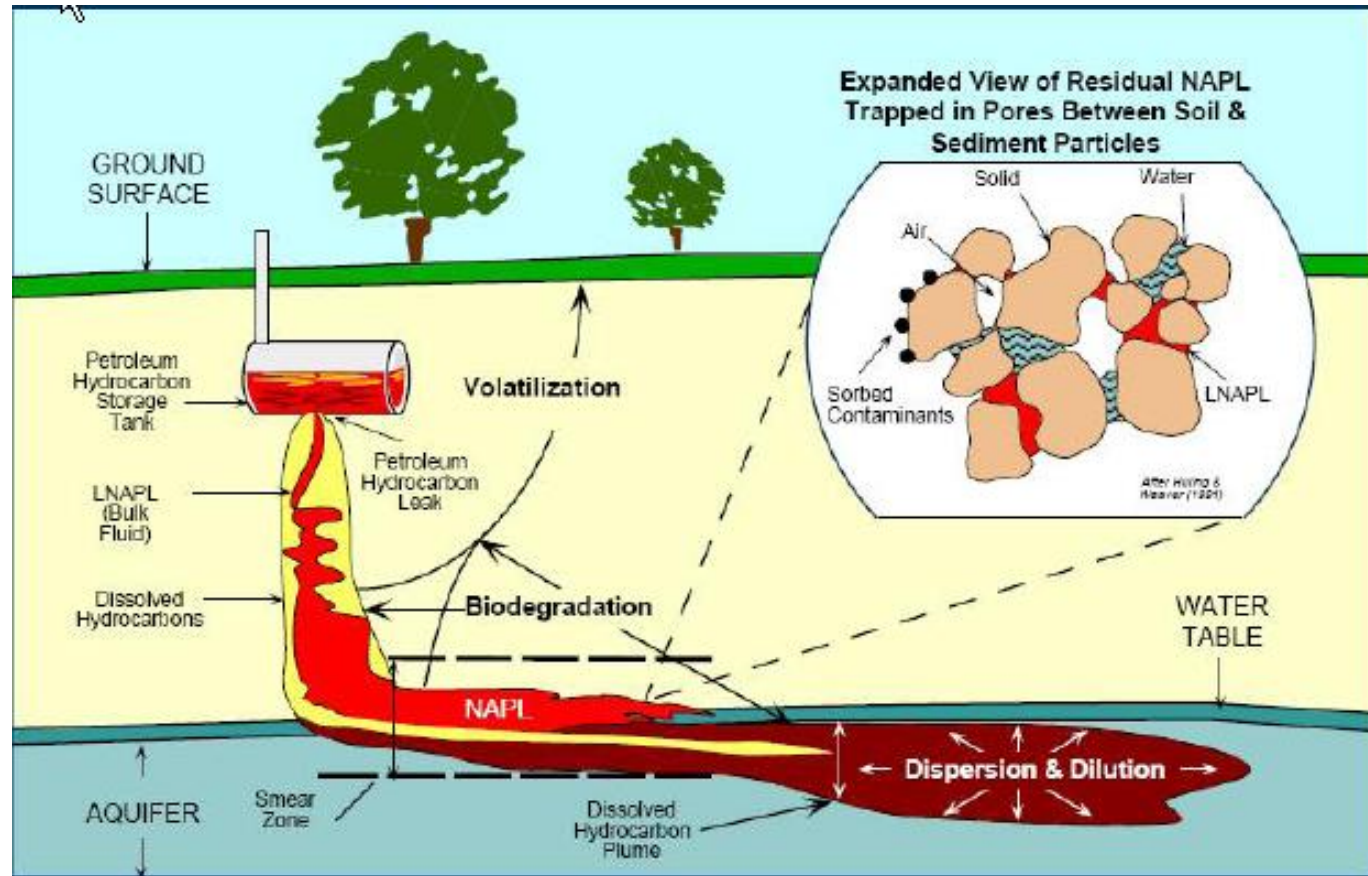
- **Policy makes reference to industry good practice.**
- **No mechanism for recognition of codes or guidelines as industry good practice.**
- **OIEWG updating Contaminated Land guideline relating to vapour and soil acceptance criteria**
- **Policy of recognition proposed.**



No Degradation Objective

- **Too absolute, zero threshold**
- **Risk that it is counter to current contaminated land approach.**
- **Not active discharges**
- **Contaminated Land management allows passive discharges**
- **Definition of sensitive aquifer.**

Example: Monitored Natural Attenuation



- Use of MNA widely accepted and implemented at petroleum hydrocarbon sites in NZ and around the world
- Sustainable remediation – low carbon footprint
- Concern: “No degradation” objective conflicts with MNA approach



Duplication of Functions

- **NPS seeks that TA's address water quality in decision making**
- **Don't want TA's seeking to control passive freshwater discharges from Contaminated Land.**
- **Need to make explicit the extent and consideration required.**



Degraded Water Resources

- **Amend definition to refer to Freshwater Resources to be Enhanced.**
- **Ensure appropriate recognition of the complexities of groundwater in identifying which resources to be enhanced and which groundwater is considered sensitive**
- **Consider permitted baseline in classifying waters in catchments.**



What Outcomes Do OIEWG Want:

- **Clear NPS that provides guidance and achieves consistent interpretation.**
- **Recognition of the MfE industry guidelines are good practice and that Councils recognise them.**
- **Present MfE contaminated land policy can continue unfettered by NPS, preferably have its own NPS.**
- **Deletion of “No degradation” objective so that sustainable remedial approaches e.g. MNA remain viable under the NPS.**
- **Recognition of Wayne Russell’s evidence.**
- **Classification of waters catchment based and identification of waterbodies to be enhanced rather labelled as degraded.**
- **Expectations for TA’s in water quality matters be explicit.**