

4 August 2023

Department of the Prime Minister and Cabinet (DPMC)
By email: infrastructureresilience@dpmc.govt.nz

Submission to consultation on Strengthening the resilience of Aotearoa New Zealand's critical infrastructure system.

1. Mobil Oil New Zealand (Mobil) is pleased to make a submission on strengthening the resilience of Aotearoa New Zealand's critical infrastructure system.
2. Mobil has reliably supplied quality fuels to Aotearoa New Zealand for more than 125 years. It is our view that Aotearoa benefits from a robust and resilient fuel supply chain, with multiple suppliers importing fuel from a wide range of sources and into multiple ports across the country.
3. When disruptions to fuel supply chains have occurred, suppliers have responded quickly and efficiently to avoid or limit any impact on fuel consumers. When these disruptions have resulted in impacts to consumers, these have often been short-lived, with suppliers leveraging Aotearoa's advanced network of supply logistics and diversity of supply sources and local transportation options.
4. This is due in large part to the mature and robust emergency preparedness and response systems and procedures that we have developed over the decades of reliably supplying the fuel Kiwis need.
5. However, we agree that it is important to review the resilience of our critical infrastructure against the variety of threats that exist today and are likely to arise in the future, helping to ensure that all essential products and services can achieve a consistent and satisfactory level of resilience to shocks, be they political, economic, social, geophysical or other.
6. Given this, Mobil contributed to and fully supports the recommendations made in the submission by Energy Resources Aotearoa, of which we are a member, on this topic.
7. However, with all the challenges currently facing Kiwis, including ongoing increases to the cost of living, any enhancements to an already resilient supply chain should carefully balance the associated cost to consumers.
8. It is also important to consider any changes to the regulation of critical infrastructure in light of Aotearoa New Zealand's increasingly complex regulatory environment.
9. The fuels industry in particular, is already subject to a number of existing and upcoming resilience measures, including the establishment of the Fuel Sector Coordinating Entity and potential Minimum Stockholding Obligation legislation. This is in addition to the Civil Defence Emergency Management Act under which we operate, amongst other legislation, such as the Fuels Industry Act that govern our industry.
10. As noted in the discussion document, increased resilience supports economic growth and a resilient critical infrastructure system will attract productive and sustainable foreign investment. A simple, cost-effective right-sized approach that increases resilience while minimising regulatory burden will best support this.

11. We would be pleased to engage more with the government on this issue and share some of our experience and learnings from operations in other jurisdictions, including Australia. Please reach out to our Public and Government Affairs Manager, Melanie Saliba at melanie.m.saliba@exxonmobil.com if you would like more information or to schedule a discussion.

Ngā mihi nui,

A handwritten signature in black ink, appearing to read 'Wayne Ellary', is positioned above a yellow rectangular stamp.

Wayne Ellary
Chair
Mobil Oil New Zealand Limited