Please direct all responses/queries to: **Ben Cranston**

Our reference: DRIMS 1401303199

30 October 2019

Lisa Gropp Commissioner **Productivity Commission**

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Dear Ms Gropp

SUBMISSION ON THE AUSTRALIAN GOVERNMENT'S RESOURCES SECTOR REGULATION STUDY

Woodside Energy Limited ('Woodside') thanks the Productivity Commission ('the Commission') for the opportunity to provide comment on the Resources Sector Regulation Issues Paper ('Issues Paper'). In offering our response. Woodside hopes to inform the Commission's draft report by drawing on our learnings as the pioneer of Australia's liquefied natural gas (LNG) industry and largest Australian natural gas producer.

About Woodside

Woodside is recognised for its world-class capabilities as an integrated upstream supplier of energy. We deliver energy solutions domestically and internationally that provide sustainable value for our shareholders, partners and the communities where we are active. Our operated assets are renowned for their safety, reliability and efficiency and we have a strong track record in project development. As Australia's premier LNG operator, we produced 6% of global LNG supply in 2018. The natural gas we produce is a low-emissions and economically viable fuel for markets domestically and around the world.

Responding to the study

The Commission's study is seeking to identify effective regulatory approaches to the resources sector and is focused on regulation with a material impact on business investment. We are well positioned to comment on resources sector approval processes and compliance with regulation, as the largest Australian producer of LNG with more than 30 years' experience and a supplier of pipeline gas to Western Australia. Since 1984, we have been providing cost effective and reliable domestic gas for Western Australian customers, and this secure local supply has benefited Western Australian residents and industry, reducing their vulnerability to fluctuations in supply and pricing of imported fuels.

We are now working to deliver our vision for the Burrup Hub in Western Australia's Pilbara region. The vision involves the proposed development of some 20 to 25 trillion cubic feet of gross dry gas resources principally from the Scarborough and Browse fields, through our established LNG facilities at Pluto LNG and the North West Shelf (NWS) Project's Karratha Gas Plant (KGP). If realised, the Burrup Hub vision could deliver LNG to global markets and domestic gas to Western Australia for decades to come. This has the potential to improve energy security in Australia and deliver other significant benefits in the form of jobs, royalties and taxes.

Regulation plays an important role in ensuring appropriate standards and public confidence in the operations of the resources sector. However, regulations that are poorly designed or implemented have the potential to impede Australian resources project approvals (and ongoing operations) without contributing either to regulatory outcomes or public confidence. They can lead to increased costs, damage Australia's international competitiveness, and risk economic activity shifting to other jurisdictions. The potential net economic loss for Australia is significant should poorly designed regulations impact timely decision making. For example, we are proposing to invest A\$40 billion on the Burrup Hub, which is expected to result in a significant direct contribution to the Australian economy through capital and operational spending, employment, taxation and royalty payments, and exports.

Our responses below follow the format of the Issues Paper and address key themes highlighted during a recent Perth forum hosted by the Chamber of Minerals and Energy Western Australia (15 October 2019),

DRIMS#1401303199 Page 1 of 10 where the Commission discussed best-practice resources sector regulation with representatives from the resources sector, including mining companies and oil and gas producers.

As was made clear to the Commission at the Perth forum by representatives from the resources sector, one of the most pervasive regulatory challenges facing our sector is that of duplication, which creates a myriad of interrelated issues. Duplication was raised as a key point in the Commission's report on Regulatory Burden on the Upstream Petroleum (Oil and Gas) Sector released on 30 April 2009, which also suggests it is not a new issue to solve but one that requires strong political will to address. Case studies that are grouped under key themes for regulatory improvement are attached as Appendix 1, whereas the Commission's Issues Paper is addressed directly below.

Woodside's responses to the Issues Paper

1) Is the Commission's proposed scope for this study appropriate? Is it too broad or too narrow? How should the proposed scope be adjusted?

Should the Commission's definitions of the concepts of broader impediments and community engagement and benefit sharing be refined? If so, how?

Are there other relevant reviews that the Commission should be aware of, including ones being conducted overseas?

Scope

Yes, the scope of the study is considered appropriate.

Definitions

No, the definitions of the concepts of broader impediments and community engagement and benefit sharing do not need to be refined.

Other reviews

Yes. In addition to the concurrent reviews noted in the Issues Paper, the Commission should also be mindful of other significant review processes, currently underway, when conducting this study:

- The Prime Minister and Treasurer have established a Deregulation Taskforce under the leadership
 of Ben Morton MP, Assistant Minister to the Prime Minister and Cabinet, and managed from the
 Department of the Treasury;
- Federal Parliament's Joint Standing Committee on Trade and Investment Growth has commenced an Inquiry into Supporting Australia's Exports and Attracting Investment, looking into local and regulatory barriers and best practice regulation to support export and investment growth;
- The Western Australian (WA) Government is conducting a simultaneous review called 'Streamline WA' to examine reduction in government process.

While the number of reviews underway demonstrate recognition that regulatory burden remains a key challenge to the resources sector, it is also considered indicative of the pervasiveness of this issue across all levels of government.

Furthermore, the study should consider the approach taken by the United Kingdom (UK) Wood Review¹. Sir Ian Wood published his report on 24 February 2014, which made key recommendations to maximise economic recovery from the UK Continental Shelf and key learnings specifically relevant to the sector's regulation. One significant change to the regulation of the UK oil and gas sector was the creation of the Oil and Gas Authority, which created operational independence from the Department for Business, Energy and Industrial Strategy (previously the Department of Energy and Climate Change). Partly in response to previous Commission reports, Australia commenced a similar journey with the establishment of the National Offshore Petroleum Titles Administrator (NOPTA) and National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) and could review whether the policy intent of this change has been fully realised, especially across State and Commonwealth jurisdictions.

Finally, the study should consider recent findings from the independent audit of NOPSEMA by Australia's Chief Scientist Alan Finkel AO², which sought to provide the community with an additional level of assurance about consideration of exploration in the Great Australian Bight. The audit outlines opportunities for greater

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¹ https://www.ogauthority.co.uk/media/1014/ukcs_maximising_recovery_review.pdf

² https://www.industry.gov.au/sites/default/files/2019-09/independent-audit-of-nopsemas-consideration-of-exploration-in-the-great-australian-bight.pdf

transparency about NOPSEMA's assessment process and oil and gas activities in general including opportunities for industry, the regulator and governments to provide further assurance.

2) The Commission is seeking feedback on whether the criteria outlined in Table 1 are appropriate for assessing whether regulation is best practice.

Yes, the criteria outlined in Table 1 (below) are considered appropriate to assess best practice regulation.

Table 1 Assessment criteria for best-practice regulation

Regulatory design Regulator governance Regulator conduct · Roles, responsibilities and Consultation during · Regulators' processes are regulation-making is sufficient requirements of different clear, predictable, open and regulatory agencies are clear · Objectives of regulation are transparent and duplication is avoided clearly defined and consistent · Regulatory outcomes are across different regulations · Decision makers are accountable consistent with objectives • Regulation is not overly complex • Regulators are independent · Administrative costs are no or excessively prescriptive higher than necessary · Regulators are adequately · Regulation is regularly reviewed resourced and have necessary capabilities

- 3) The Commission is seeking feedback on how jurisdictions design regulation that affects the resources sector. Information and examples, including case studies, of effective and best-practice approaches and those that are problematic would be appreciated. In particular, the Commission is interested in whether:
- approaches to consultation are amenable to best-practice community engagement
- regulatory objectives are clearly defined and articulated, and conflicting objectives are minimised or managed across different regulations
- regulatory 'creep' occurs
- regulation is overly complex or prescriptive
- regulations are subject to rigorous assessment and effective review processes.

What are the consequences of identified instances of poor regulatory design for regulatory outcomes, investment in the sector and broader community outcomes.

How could identified shortcomings be remedied?

At Woodside, the majority of our current and proposed projects are regulated by Commonwealth and State regulators, resulting in significant duplication of requirements during the project approval phase, which then translate into ongoing compliance issues.

With respect to regulatory 'design', the following are key issues for Woodside:

- Regulatory creep is where a regulator's interpretation of how a relevant Act or Regulation applies is broadened over time beyond its original intent. This occurs when broadening extends into areas covered by other regulators and/or is captured into guidance and other documents. This 'creep' can be driven by unclear regulations or different interpretations by individuals leading to efforts to clarify, sometimes, but not always, codified in guidance notes. This can be an outcome of untimely assessment and review of regulation, which does not keep pace with advancements in the sector.
- Overly burdensome reporting occurs where regulators require reporting which does not appear to aid in
 demonstrating compliance with regulation and often manifests where new reporting requirements are
 added without an apparent basis in regulations. It does not appear to be well understood that reporting
 requirements are forms of regulatory burden in themselves, and that they often cascade through the
 supply chain to rest upon small contractors and suppliers who are ill equipped to respond.
- Duplication of regulatory design and jurisdiction leads to the duplication of roles, responsibilities and requirements of different regulatory agencies, and the cumulative impact of even modest variations in approach can be significant.

Specific examples of these issues are contained in Case Studies 1, 2 and 3 included in Appendix 1.

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4) The Commission is seeking feedback on approaches to regulator governance in jurisdictions in Australia and overseas. Information and examples, including case studies, of both effective and best practice approaches as well as those that are problematic would be appreciated.

For example, the Commission is interested in whether:

- the roles, responsibilities and requirements of different regulatory agencies are clear and duplication is avoided, including through
 - models for coordination, or aspects thereof, and strategic assessments (in particular, their feasibility and how they can best be used to improve efficiency)
- decisions makers are accountable, including through
 - review processes that avoid unnecessarily long delays in approval processes
- regulators are independent, for example:
 - decision-making models (in particular, whether (and why) resources approvals are best determined by an independent body or at Ministerial level)
- regulators are adequately resourced and have necessary capabilities (in particular, the extent to which any under-resourcing of regulatory agencies is contributing to approval delays).

What have been the consequences of identified instances of poor regulatory governance, including unnecessary duplication, for regulatory efficacy and efficiency and for investment in the sector?

How could identified shortcomings be remedied?

The Commission is also interested in the different approaches agencies have taken to recover costs. Should 'user pays' be applied more broadly.

With respect to regulatory 'governance', the following are key issues for Woodside:

- Where multiple agencies have jurisdiction over a project, or an aspect of a project, a number of issues can occur. Where dual-processes are required, additional and unnecessary work is created, and where multiple parallel approvals are required across jurisdictions and agencies, there is no central coordinating agency or office, and a lack of coordination and prioritisation can lead to project delays. Importantly, project proponents do not get to choose the relevant regulator(s) and, furthermore, have no mechanism to make recommendations where there could or should be a single regulator to reduce duplication.
- Delays in regulators fulfilling their obligations can appear, at times, to be driven by resourcing constraints within agencies. The matter of adequate resourcing is not just about personnel numbers but equally applies to the availability of suitable technical expertise and live industry experience within the regulator.
- Delays in decision-makers' timeframes have been encountered, and the use of "Stop the Clock" provisions when considering Levels of Assessment for referrals under the *Environment Protection and Biodiversity and Conservation Act 1999* (Cth) (EPBC Act) appears routine.

Specific examples of these issues are contained in Case Studies 4, 5, 6 and 7 included in Appendix 1.

- 5) The Commission is seeking feedback on regulator conduct in jurisdictions in Australia and overseas. Information and examples, including case studies, of both effective and best-practice approaches, as well as those that are problematic, would be appreciated. For example, the Commission is interested in whether:
- regulators' processes are clear, predictable, open and transparent
- regulatory outcomes are consistent with their intended objectives, including whether compliance and enforcement mechanisms have been effective, for example
 - with respect to: compliance effort; the use of information to test compliance with approval conditions; rehabilitation processes; and the design and monitoring of offsets
- unnecessary costs and delays have been minimised and how this has been achieved (of example, through statutory timelines)

What have been the consequences of identified instances of poor regulator conduct, including inconsistency, inadequate enforcement and unduly protracted processes, for investment in the sector?

How could identified shortcomings be remedied?

With respect to regulatory 'conduct', the following are key issues for Woodside:

- Regulators' processes are not universally clear, predictable, open and transparent. Where processes are
 not clear, predictable, open and transparent and significant changes are made and implemented without
 meaningful consultation, there is great risk to future investment in the resources sector because the
 planning and decision making basis at projects in undermined.
- There are instances where approaches to enforcement of regulation appear to vary based on individual interpretations of the relevant regulations, and even where these appear minor in isolation they have a cumulative impact.
- Woodside is seeing an increasing tendency for regulators to behave in an overly risk-averse manner
 when interpreting their regulations, which creates unnecessary work for existing projects and threatens
 new ones. This issue is thought to be, in-part, driven as a response to a new era of 'lawfare' litigation in
 Australia, and may require a legislative response.

Specific examples of these issues are contained in Case Studies 8, 9 and 10 included in Appendix 1.

6) The Commission is seeking examples of government activity beyond resources sector-specific regulation that influences investment, particularly where that activity represents a major impediment. How important for investment are these impediments.

How could the impact of these impediments be reduced?

The study should consider the continuing development and maturation of technologies to enable remote operations in the resources sector, and the appropriate regulatory settings to facilitate their fast-paced development. These technologies and supporting capabilities will enable the Australian resources sector to establish a competitive position, and mean that industry does not have to import these technologies, and the related jobs and contracts, from elsewhere in the world. Poor regulation which stifles the home-grown development of these technologies could lead to the future of large parts of the resources industry being led from overseas. The issue is two-fold. Firstly, existing regulations may constrain or limit the development and testing of new and emerging technologies, which underpin remote operations and the implicit reduction in personnel exposure. Secondly, and perhaps more significantly, a supportive regulatory environment is needed to encourage the development and testing of the technologies.

7) The Commission is seeking examples of both effective and best-practice community engagement and benefit-sharing practices, including with Indigenous communities, in Australia and internationally, and examples that are problematic.

What are key drivers of good or poor outcomes? How could identified shortcomings be remedied?

Working sustainably is a core value embedded at every level of our company. It is fundamental to maintaining our social licence to operate, and being a global leader in upstream oil and gas. As an Australian company with a global portfolio, we are proud of the contribution we make to sustainability in the communities we are part of and in the markets we supply.

Woodside has been part of Reconciliation Australia's Reconciliation Action Plan (RAP) program since 2009. Overseen by not-for-profit organisation Reconciliation Australia, RAPs require participants to publicly nominate and report on practical actions they are taking to foster reconciliation and build shared value with local partners, government and industry, thereby building stronger communities.

Woodside was the first oil and gas company to join the program, and we have continued our pioneering approach. Our current 2016 – 2020 RAP has been recognised for shifting away from measuring activities, in favour of longer-term outcomes. It has also been given Reconciliation Australia's highest rating of Elevate. We report every year on progress from our base year (2016) towards committed outcomes against the three core pillars of Respect, Relationships, Opportunities and the fourth additional pillar for Elevate-level RAPs, National Leadership. Woodside's current RAP can be accessed <a href="https://example.com/here-term/here-t

Further information about Woodside's sustainability approach and performance is available in our <u>2018</u> Sustainable Development Report and on our website (woodside.com.au).

Thank you again for the opportunity to respond to the Commission's Issues Paper, and Woodside would be pleased to support the Commission with further discussion where helpful.

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Yours sincerely

Michael Abbott Senior Vice President, Corporate and Legal

APPENDIX 1 - CASE STUDIES

We will address the three themes below largely in terms of their potential to create unnecessary regulatory burden and project delays:

- **Theme 1 Duplication** where regulation, processes of compliance and supporting effort is duplicated between different agencies and/or jurisdictions.
- Theme 2 Human factors and resourcing where the same regulation is enforced differently by different individuals, or where agencies are inadequately resourced to meet timelines, both in terms of capacity and technical capability.
- Theme 3 Evolutionary change where, without being formally changed, regulation is expanded through the preparation of additional documentation and the setting of precedents; or where out of date regulations are kept in force beyond their original purpose or have not stayed regulatory-relevant in an environment of changing technology and innovations.

Case Study 1 - Reporting on Ministerial Statements and Licences

Theme: Evolutionary change

Part 4 Ministerial Statements are issued under the *Environmental Protection Act 1986* (WA). The WA Department of Water and Environmental Regulation (DWER) supports the WA Environmental Protection Authority (EPA) including by monitoring compliance with the conditions of Ministerial Statements. Under the current approach, there is a requirement to continue to report on construction-based conditions in the Ministerial Statement. The key challenge associated with this approach is best highlighted at KGP, where we must continue to report on conditions created in 1998, which are largely out-of-date, for the life of the project.

Recommended solution

Ministerial Statements should approve a project and contain construction-based conditions, with ongoing operational conditions to be built into the operational Part 5 Licence ('the Licence'). A revised approach would see ongoing updates to the Licence capture the evolving thinking of the day.

Case Study 2 - Release of guidance documents and discussion papers

Theme: Evolutionary change

It is common for regulators to release guidance documents and discussion papers for comment, which will typically extend ideas presented in regulations with the intention of providing further clarity. Often, this is in response to a lack of uniform understanding and agreement amongst operators on existing regulations. Such documents and papers can, in practice, extend to become enforceable and therefore quasi-regulation, creating additional compliance obligations.

Recommended solution

Regulation should be written in a way that avoids ambiguity and the need for further guidance and discussion papers to fill in the gaps. Furthermore, regulators should only release such documents where it will result in a material benefit to its ability to regulate and operators' ability to comply with regulation.

Case Study 3 - Multiple reporting requirements

Theme: Duplication

Multiple annual environmental performance and compliance reporting requirements for State Agreement Acts, Ministerial Statements and Environmental Licences, required by DWER and the WA Department of Jobs, Tourism, Science and Innovation, result in multiple reporting time frames and duplication of information, with only marginal shift in focus between reports.

Recommended solution

Development of a single report could be facilitated through information technology and sent through to multiple agencies through a shared portal, providing confidentiality is appropriately managed.

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Case Study 4 - Scarborough Trunkline

Theme: Duplication

The proposed trunkline which will transport natural gas from the Scarborough Field to the Pluto LNG facility is assessed by NOPSEMA when in Commonwealth Waters, and then by both the State EPA and the Federal Department of Environment and Energy (DoEE) in State Waters. This is because there is no conferral of powers from WA to NOPSEMA in State Waters.

Recommended solution

Wherever possible, 'one stop shops' should be created, whereby a single regulator is conferred the necessary powers to consider resources sector development proposals. In the above example, it was a deliberate policy decision of the previous WA Government not to confer its powers on NOPSEMA and allow a 'one stop shop', despite the recommendations of the Commission and despite the then Federal Government's response to the Borthwick Inquiry into the Montara well blow-out. Had that conferral taken place, our single trunkline could have had a single assessment from a single regulator all the way to the beach.

In the above example, we are proposing what constitutes the completion of a streamlining process that has previously been recommended by the Commission. However, more broadly, there should be a mechanism via which project proponents can make recommendations where there could or should be a single regulator, to reduce duplication.

Case Study 5 - Coordination of approvals

Theme: Human factors and resourcing

For large resources projects, once primary approvals are secured, there remain numerous secondary and tertiary regulatory approval requirements, administered by multiple regulators. This creates coordination and resourcing challenges both for project proponents and governments. In 2005, in WA, the non-statutory Office of Development Approvals Coordination (ODAC) was established to coordinate statutory approvals processes for large or complex proposals and streamline and improve understanding of regulatory approvals processes The ODAC also played the role of independently reviewing opportunities for regulatory improvements proposed by industry. In Queensland, the Coordinator-General performs a similar function.

Recommended solution

The concept of an approvals coordination body should be revisited but would require consultation with regulators and industry to agree the best structure to ensure its effectiveness.

Case Study 6 - Browse Development

Theme: Duplication

The Browse Joint Venture plans to develop the Brecknock, Calliance and Torosa fields in the Browse Basin, for processing at the NWS Project's KGP. However, these fields and infrastructure straddle Commonwealth and State Waters, creating significant regulator interfaces and potential duplication.

For example, Woodside is required to provide a Field Development Plan (FDP) to NOPTA, which is responsible for administration of all petroleum titles in Commonwealth Waters in Australia. In addition, there is a requirement to submit a similar plan to the Department of Mines, Industry Regulation and Safety (DMIRS). The Torosa Field straddles the State / Commonwealth boundary, so even though it is developed as a single project, FDPs need to be prepared and approved for each jurisdiction.

Similarly with respect to Browse's environmental approvals, the 2014 streamlining initiatives enabled NOPSEMA assessment of petroleum activities under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth), but only in Commonwealth waters only. In State Waters there has been no conferral of powers upon NOPSEMA so EPA assessment is required, and in addition for potential impacts on matters of National Environmental Significance in State Waters, assessment by the DoEE is still required. As a result, in respect of Browse the DoEE, NOPSEMA and the EPA reached an in-principle agreement in 2018 whereby a common approach to environmental approvals for the project would be adopted. It was agreed that both the EPA and DoEE would assess the project via a single combined

Commonwealth Environmental Impact Statement / State Environmental Review Document (ERD), with NOPSEMA engaged by the DoEE to support Commonwealth assessment. In practice it has been extremely difficult to meet different decision maker requirements in such a combined document, therefore a separate State ERD has been prepared at late notice and within weeks of the expected publication of the combined document. Whilst the drivers for separation are understood it has resulted in a duplication of effort and rework.

Agreed and recommended solutions

On the FDP, Woodside understands NOPTA will coordinate the assessment and joint feedback process with DMIRS, and with NOPTA to share the FDP with DMIRS. This is a good example of cross-agency coordination leading to the adoption of a pragmatic way forward that maintains compliance with regulations.

On the primary environmental approvals, it would be extremely counterproductive to alter arrangements at this advanced stage for the Browse to NWS Project, however it is recommended efforts continue to integrate oil and gas primary environmental approval processes for activities in the marine environment under a single decision maker for future projects. Industry would welcome further discussion regarding how this might be structured.

Case Study 7 - Resourcing challenges and cost recovery

Theme: Human factors and resourcing

Woodside has experienced some delays working with DWER and the EPA, across project assessments (Part 4), works approvals and licencing (Part 5) and compliance (Part 6), which appears to be driven largely by resourcing constraints.

Recommended solution

It is recommended, in response, that DWER moves to a cost recovery approach in order to be able to better match its resourcing to the workload generated by proponents. This model appears to have enjoyed some success at NOPSEMA and if managed appropriately should lead to a more adequate resourcing profile. Furthermore, it may then enable DWER to publish and work to consistent timeframes for responses.

Case Study 8 - EPA greenhouse gas assessment guidance

Theme: Duplication; human factors and resourcing; evolutionary change

In March 2019, the EPA released its Environmental Factor Guideline: Greenhouse Gas Emissions and a Technical Guidance: Mitigating Greenhouse Gas Emissions (collectively 'the guidelines'). The EPA justified its approach by asserting that it considered Commonwealth policy to be inadequate. The regulator did not consult with affected project proponents prior to releasing its advice. It introduced its guidelines with immediate effect, even for projects which were approaching the end of their environmental approvals process. The EPA rescinded the guidelines a week later due to the absence of consultation, noting significant concern about their content, and has since undertaken industry consultation.

Recommended solution

Regulators should clearly distinguish between jurisdictional responsibility for policy and not seek to usurp jurisdiction from the proper authority simply because they do not agree with the approach taken by that authority. Proposed changes should be consulted upon in a transparent fashion, so that all relevant issues can be raised and considered. Changes should be introduced with prospective effect only. Regulators that enjoy statutory independence in decision making should not consider themselves exempt from best practice consultation practices.

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Case Study 9 – Variability in approaches to and jurisdiction exceedances during DMIRS inspections

Theme: Human factors; evolutionary change

Woodside has experienced a degree of variability in approaches to inspections, depending on the inspector. One particular area of variability has been in the scope of inspections, with some inspectors seeking to regulate areas not covered by DMIRS. Furthermore, Woodside has, at times, experienced a lack of clarity in findings, resulting in significant time and work being required to finalise inspections.

Recommended solution

Periodic reviews of the agreed terms of reference for inspections would enable more consistent approaches to inspections.

Case Study 10 - Lengthy decision-making timeframes for Exploration Titles

Theme: Human factors and resourcing

In October 2018, Woodside made an application on Round 1 of the 2018 Acreage Release in relation to re-release area NT17-1. The application was receipted by NOPTA on 18 October 2018. Progress on the application was sought by Woodside on 20 June 2019, noting that the application status shown in the National Electronic Approvals Tracking System portal was indicating at that point the application had remained with the Joint Authority for decision making for 74 days. The resulting offer of title for NT/P86 was received on 28 June 2019.

Recommended solution

Publish decision-making timeframes and report performance against them.

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