



EnerGeo Alliance
c/o 45 Ventnor Av.
West Perth
WA 6005
Australia

SUBJECT: Consultation: Consultation in the course of preparing an Environment Plan guideline

To whom it may concern,

The EnerGeo Alliance submits the following feedback to the consultation process entitled, 'Consultation in the course of preparing an Environment Plan guideline'.

The EnerGeo Alliance supports the Australian regulatory process as set out in the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 and associated legislation. EnerGeo members have a decades-long, global history of working constructively with governments and regulators to consult on, plan and execute seismic surveys.

EnerGeo members work across the world to the highest standards of safety, environment performance and community consultation. EnerGeo members have funded the preparation of best practice documents that are shared with members and the general public. Our members are committed to genuine consultation and engagement with stakeholders as evidenced by contributions to drafting of the seismic-fisheries Guidance Framework issued by DAFF and DISR¹.

Specifically, EnerGeo is concerned by recent events in the Federal Court and its implications as translated in this draft guideline. The expectation that our members consult about how to consult laid out in point 2. *Scope* puts an additional risk on acceptance of the environment plan. EnerGeo is concerned that parties can use this

¹ <https://www.agriculture.gov.au/sites/default/files/documents/guidance-framework-supporting-cooperative-coexistence-seismic-surveys-commercial-fisheries.pdf>



requirement to delay, divert and distract the start of the consultation process. We consider that this step increases the cost of activity and the risk of non-acceptance or later challenge.

We ask NOPSEMA and wider government reflect as to whether additional clarity on the consultation process should be drafted into regulations and/or legislation.

More generally, we note that EnerGeo members are at the forefront of the energy geoscience business acquiring geophysical images of the seabed and subsurface often at their own risk in the form of multi-client surveys, and that those surveys are a pre-cursor to petroleum exploration drilling and many offshore windfarm developments. The commercial proposition of these surveys is a balance between cost, expected return and risk of execution (of the survey and requisite approvals).

Any increase in cost and risk will be passed on in higher costs to the companies that licence our multi-client surveys. The licensees will benchmark the survey costs, against risk and reward against the risk and reward of activity elsewhere.

EnerGeo and its members are available for further discussion on this matter. Please contact me in the first instance.

Your faithfully,

[Redacted signature]

[Redacted contact information]

[Redacted contact information]