

12 June 2026

Chief Executive Officer Hayley Richards
Chair Onshore Supply Chain Working Group
Business Industry Development
Department of Trade, Business and Asian Relations
BID.DTBAR@nt.gov.au

Dear Ms Richards,

RE: LOCAL BENEFIT OPERATOR REPORTING TEMPLATE

Thank you for the opportunity to provide input into the draft Local Benefit Operator Reporting Template and supporting Guidelines.

Australian Energy Producers (AEP) appreciates the Northern Territory Government's continued collaborative approach to engagement with industry, and we are supportive of the intent of this framework. In particular, we recognise the importance of clearly demonstrating the economic and social contribution of the onshore gas industry to Territorians, both to support community confidence and to inform policy and capability development.

Our members understand the value of a consistent local benefit reporting approach, including its role in strengthening social licence, identifying opportunities to grow local participation, and supporting long-term cost efficiencies through the development of a more capable local supply chain.

At the same time, our membership reflects a diverse range of operators—from large multinational companies with established internal reporting and procurement systems, through to smaller and emerging operators where limited staff are responsible for multiple business functions. It is therefore important that the reporting framework remains genuinely fit-for-purpose, proportionate, and practical across all operator types.

Consistent with the Government's stated intent for a "light-touch" and high-level reporting framework, we consider that some refinements would further support ease of implementation, reduce unnecessary duplication, and ensure the framework achieves its intended outcomes without creating unintended administrative burden.

We have provided detailed feedback in the table below.

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Area	Comment	Recommendation
Overall approach - alignment with intent	The framework is described as a “light-touch” process using existing company records; however, in practice, the level of disaggregation and formatting required may result in additional manual processing and data transformation.	Reinforce a minimum viable reporting approach that prioritises readily available data, and confirm that approximate, aggregated reporting is sufficient where systems do not align exactly with template fields.
Duplication with existing reporting systems	Many operators, particularly larger companies, already capture workforce, procurement, and expenditure data through established corporate systems (often aligned to global reporting frameworks). The current template structure may require reformatting or duplication of existing data, rather than direct extraction.	Allow operators to submit existing internal reports or extracts where they meet the intent of the framework, with mapping to key indicators, rather than requiring strict completion of the template.
Complexity of contractor vs operator splits	The requirement to separate and attribute data across operator and contractor (including workforce and expenditure) may be difficult to consistently or accurately derive, particularly where operators do not have full visibility of contractor internal data.	Simplify reporting by allowing: • combined reporting (operator + contractor) where disaggregation is not readily available; or • optional contractor breakdowns where data can be reliably provided.
Use of percentage (%) fields	The requirement to provide percentage splits across multiple indicators adds an additional calculation burden and may introduce inconsistencies where underlying totals are estimated.	Remove mandatory % fields, or make them optional / auto-derived by Government based on reported figures. Focus reporting on absolute values only.
Burden on smaller operators	Smaller and early-stage operators may not have dedicated reporting or procurement functions and may rely on manual systems. The breadth of indicators and narrative responses risks placing disproportionate administrative burden on these operators.	Introduce a tiered or scaled reporting approach, for example: • streamlined “short-form” option for small operators; or • reduced requirements based on activity level or expenditure thresholds.

NT business listing (ABN requirement)	The requirement to provide a full list of NT businesses (including ABNs) engaged by operators and contractors may be administratively complex, particularly where contractor data is involved or where systems do not centrally capture ABNs.	Clarify that: • best-efforts reporting is acceptable; and/or • limit requirement to operator-level suppliers only, or allow sampled / top supplier reporting instead of full lists.
Clarity of definitions and consistency	While definitions are provided (e.g. NT resident, Territory enterprise), there may be differences between company systems and these definitions, requiring manual reconciliation.	Confirm that reasonable interpretation aligned to existing systems is acceptable, and avoid strict compliance expectations where definitions cannot be directly mapped.
Narrative sections (qualitative inputs)	Sections such as capability gaps, reasons for external procurement, and future opportunities are valuable, but may be time-intensive and subjective, particularly for smaller operators.	Retain these sections but: • emphasise short, high-level responses; • make them clearly optional or indicative, rather than comprehensive requirements.
Focus on outcomes (use of data)	The framework presents a strong opportunity to inform policy and industry development, particularly in identifying capability gaps and opportunities for NT businesses.	Ensure transparency on how data will be used to: • support local supplier development initiatives; • reduce structural barriers to NT participation; and • ultimately improve cost competitiveness through local capability growth.
Flexibility in submission format	The template requires structured input fields, which may not align with how operators store or report data internally.	Provide clear guidance that alternative formats are acceptable, without requiring prior approval on a case-by-case basis where intent is met.

AEP is committed to working constructively with the Northern Territory Government to ensure the Local Benefit Operator Reporting framework achieves its objectives.

We support the development of a reporting approach that:

- demonstrates the value the industry delivers to Territorians

- strengthens social licence
- informs capability development and policy settings
- and supports the long-term growth of a competitive local supply chain

With the refinements outlined above, we consider the framework can strike the right balance between transparency and practicality and be successfully implemented across the full spectrum of operators active in the Territory.

We would welcome the opportunity to continue engaging with the Department as the framework is finalised.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Neve', with a stylized, flowing script.

Ryan Neve
Northern Territory Director
Australian Energy Producers