NATIONAL OFFSHORE PETROLEUM TITLES ADMINISTRATOR | *STATUTORY REVIEW*

Australian Energy Producers | 30 October 2026

Australian Energy Producers welcomes the opportunity to provide a submission to the statutory review of the activities of the National Offshore Petroleum Titles Administrator (NOPTA).

NOPTA plays an essential role in the integrity, stability and effective administration of Australia's offshore petroleum and greenhouse gas (GHG) storage titles framework. Industry participants value NOPTA's expertise and recognise improvements made since 2020, including the continued development of the National Electronic Approvals Tracking System (NEATS), the expansion of online application functionality and the redevelopment of the National Offshore Petroleum Information Management System (NOPIMS). These developments provide a strong foundation for accessible digital titles and petroleum information.

Industry has identified several areas for improvement in how NOPTA delivers its functions and supports applicants and titleholders. Priority areas include the predictability of acreage releases; end-to-end processing times; the transparency of assessment pathways and legislative interpretation; the quality and consolidation of requests for information; the proportionality and clarity of compliance expectations; the capacity of digital systems to support the full application and communication process; and value for money and transparency in cost recovery.

Australian Energy Producers supports NOPTA's role as a strong and independent specialist titles administrator and recommends building on its strengths to improve transparency, timeliness, proportionality, cross-agency coordination, digital services and accountability in cost recovery.

Priority recommendations

- **Streamline, consolidate and standardise acreage release cycles to provide certainty |** The Australian Government and relevant Joint Authorities, supported by NOPTA within its statutory remit, should establish a predictable annual acreage release cycle, publish measurable selection criteria and release nomination-to-outcome data.
- **Reduce end-to-end processing times |** Identify and address delays and bottlenecks across screening, assessment and referral stages, streamline internal decision pathways and coordinate handovers to minimise avoidable delays.
- **Adopt risk-based assessment and compliance pathways |** Apply assessment and compliance requirements proportionately to risk, focusing scrutiny on higher-risk applicants and titleholders and providing a clear pathway for recognising remediation and sustained subsequent compliance.
- **Clarify and consolidate guidance on assessment and regulatory compliance processes |** Clarify and consolidate existing guidance on assessment criteria, application

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- stages and escalation pathways, and provide additional guidance where gaps remain. Consult industry early on proposed material changes.
- **Increase transparency of regulatory performance |** Publish measurable service standards and regularly report performance against them, including end-to-end processing times. Distinguish NOPTA's assessment and decision-making time from time with applicants and other decision makers, and explain how screening, requests for information (RFIs) and stop-clock periods are treated.
- **Build information sharing capabilities and streamline reporting requirements across agencies |** Coordinate information requirements with NOPSEMA and other agencies through a "report once, use many times" approach wherever legislation permits.
- **Continue building digital capability |** Evolve NEATS and NOPIMS into an integrated, reliable and two-way digital environment for applications, payments, reporting, data submission, status tracking and communication.
- **Ensure accountability and transparency in cost recovery |** Publish transparent cost allocations and a plan to improve efficiency, informed by independent review. Link any fee or levy increases to measurable service and productivity commitments.

FEEDBACK AND RECOMMENDATIONS

Acreage release

The Department of Industry, Science and Resources (DISR) leads the acreage release process, with relevant Joint Authorities responsible for decisions on areas to be released. While NOPTA does not control the release timetable, the lack of a regular, predictable schedule limits the effectiveness of the offshore titles framework in supporting exploration, investment and long-term resource development. NOPTA's administration, assessment and specialist advice support Joint Authority decision-making, and its contribution to the efficiency of that process is expressly within the review scope.

Public information shows a marked reduction in petroleum release activity after 2020. This is despite the roll out of a new model for nominations in 2019 that was intended to be more responsive to market demand, improve transparency and increase feedback opportunities.

NEATS data identify 42 petroleum release areas in 2020, 21 in 2021 and 10 in 2022. Public information on nominations and their progression to release is fragmented across government publications and systems, making consistent year-to-year comparison difficult. A consolidated, downloadable nomination-to-outcome dataset would improve transparency and enable the release process to be assessed on a consistent basis.

Industry participants have also experienced difficulty locating a complete and readily accessible set of historical information for the 2020 to 2024 period. Clearer navigation and consistent archival access would assist stakeholders in evaluating performance over time.

Industry participants consider the nomination, consultation and gazettal process to be unpredictable. Although broad selection factors that the Joint Authority considers in selecting release areas are identified on the DISR website, industry participants seek greater visibility and consistency in the methodology for applying them and the reasons nominations are accepted or rejected.

The following recommendations are directed to the Australian Government and relevant Joint Authorities, with implementation involving DISR, NOPTA, Geoscience Australia and relevant state and territory agencies according to their respective responsibilities.

Recommendations

- Conduct petroleum and GHG storage nomination and bidding rounds on a regular annual cycle, with published and consistent indicative timeframes.
- Publish clear and measurable criteria for area selection and explain, at an appropriate level, why nominated areas progress, are deferred or are not released.
- Publish annual data on nominations received, areas advanced to public consultation, areas released, bids received and outcomes, while protecting commercially sensitive information.
- Provide downloadable geospatial and tabular data, not map-only access, and align NEATS acreage information with Geoscience Australia's acreage release portal and pre-competitive datasets.
- Coordinate petroleum and GHG storage release calendars and, where practicable, improve alignment with relevant state and territory release cycles.
- Streamline access to legally releasable seismic and well data so potential bidders can evaluate acreage efficiently and on a consistent basis.

Assessment process

NOPTA's assessment function is fundamental to robust titles administration. Industry participants recognise that careful assessment and requests for further information are necessary to test statutory criteria, assess applicant suitability where applicable and support informed titles decisions, alongside NOPSEMA's separate safety, well-integrity and environmental responsibilities. Industry experience indicates scope to improve visibility, timeliness and consistency across the complete assessment pathway.

Proponents generally have limited visibility of where an application sits, whether it has completed screening, whether it has been referred onward, what the next milestone will be, and which considerations are material to the recommendation. This does not require disclosure of confidential advice or deliberations. It does suggest a need for a clearer status-management framework that enables proponents to manage investment, approvals sequencing and stakeholder expectations.

Published performance metrics do not always capture the total elapsed time experienced by an applicant. Industry participants report that significant time can elapse before a matter enters the formal assessment stage. Screening, RFIs and stop-clock arrangements can therefore produce a difference between reported assessment performance and the applicant's end-to-end experience.

Industry acknowledges that RFIs are an important assurance tool. However, participants report multiple sequential rounds, questions that revisit material already supplied, and requests framed around an immediate information gap without explaining the underlying assessment issue. Better context and consolidation would allow applicants to provide more targeted responses while preserving assessment rigour.

Recommendations

- Adopt differentiated, risk-based assessment pathways so that straightforward or low-risk matters can be progressed proportionately while complex matters receive deeper scrutiny.
- Measure and report total elapsed time from lodgement to final outcome, distinguishing between decisions made by NOPTA and matters where NOPTA provides advice or recommendations for a subsequent Joint Authority decision. Separately identify time spent on screening, active assessment and applicant responses, and explain how stop-clock periods are treated.
- Complement stage-based reporting with a breakdown of time attributable to NOPTA, the applicant, relevant Commonwealth and state or territory participants, and the Joint Authority.

This would help identify delays and handovers between bodies without attributing the entire process to NOPTA.

- Define standard assessment stages and provide milestone notifications through NEATS, including receipt, screening completion, active assessment, referral, information request, recommendation and final outcome.
- Assign a named case manager to complex applications and those involving multiple government participants, with responsibility for coordinating handovers, communicating progress and escalating delays, while respecting each body's statutory responsibilities.
- For applications exceeding published service standards, provide a documented recovery plan identifying the outstanding issue, responsible participant, evidence required, next decision milestone and revised indicative timetable.
- Clarify and consolidate existing guidance on indicative assessment pathways and criteria for common application types, including the evidence needed to demonstrate financial capacity, technical capability and work-program credibility.
- Offer early technical meetings for complex applications to clarify the applicable statutory tests, material evidence requirements and likely assessment pathway, and identify substantive evidence gaps promptly.
- Improve the quality of RFIs by consolidating questions where practicable, identifying the statutory or assessment issue being assessed and distinguishing essential information from optional supporting material.
- Introduce internal quality assurance for repeated or late-stage information requests and provide an accessible escalation point where applicants consider that a request duplicates existing material or lacks sufficient context.

NOPTA's regulatory role

NOPTA remains central to the administration of offshore petroleum and GHG storage titles and to the provision of specialist advice supporting Joint Authority decisions. Its role has become more demanding with increased requirements for transparency, regulatory coordination and responsiveness to emerging GHG storage activity. The focus on capability, risk settings, legislative interpretation and readiness for increased carbon capture and storage data in the Terms of Reference for this Statutory Review reflects the broader operating context that has emerged for NOPTA during this time.

Industry participants regard NOPTA as technically capable and institutionally mature. However, ongoing concerns remain about whether its expanded capability and resourcing have translated into visible improvements in service delivery, stakeholder experience, guidance and timely decision-making. Industry participants have reported that material changes to administrative expectations can be introduced without sufficient early engagement, making implementation more difficult and reducing predictability.

The allocation of regulatory responsibilities between NOPTA, NOPSEMA, the DISR, state and territory governments and Joint Authorities necessarily creates a number of interfaces. During the review period, these have resulted at times in duplicated engagement and uncertainty about how information supplied to one body may or should be used by another agency. A more coordinated and transparent approach would reduce unnecessary administrative burden without reducing statutory responsibilities or weakening confidentiality protections.

Existing guidance published on NOPTA's website – including with respect to Applicant suitability, exploration work-bid permits, retention leases, titleholder transactions and offshore petroleum decommissioning guidelines – provides a foundation for assessing capability and discharging obligations across the petroleum title lifecycle. Read together, these documents distinguish NOPTA's

own decision-making functions and assessment and advisory responsibilities from decisions reserved to the relevant Joint Authority, while recognising NOPSEMA's separate responsibilities. The review should assess whether this guidance is applied consistently and proportionately at the relevant statutory decision points, including in assessing capacity to meet decommissioning obligations, and whether agency interfaces and evidence requirements are sufficiently clear. Responsibility for meeting obligations remains with titleholders, and titles decisions do not replace separate activity approvals.

Recommendations

- Establish and publish measurable administration service standards, with regular reporting against timeliness, stakeholder experience, guidance quality and decision-support outcomes.
- Review delegations and internal decision pathways to identify matters that can appropriately be resolved at a lower level without compromising statutory accountability.
- Publish clearer guidance on NOPTA's legislative interpretations, including where discretion exists, how competing considerations are considered and when departures from established practice may occur.
- Introduce a formal stakeholder consultation protocol for material changes to forms, guidance, evidence expectations, workflows or digital processes.
- Where guidance, interpretation or evidence expectations change materially, explain the basis for the change, its commencement and its application to applications already lodged, supported by appropriate transitional arrangements and an opportunity for technical dialogue.
- Agree practical information-sharing and referral arrangements with NOPSEMA and relevant departmental areas, including a single-submission model where the same information is required for related regulatory purposes.
- Undertake a capability review focused on changing petroleum activity, growth in GHG storage functions, data-management demands and the skills required to provide timely, consistent advice across both functions.
- Assess the implementation and effectiveness of legislative and administrative changes made in response to the relevant recommendations of the 2020 Walker Review, including the Offshore Petroleum and Greenhouse Gas Storage Amendment (Titles Administration and Other Measures) Act 2021. Examine whether these changes have delivered clear responsibilities, proportionate oversight and consistent guidance on title transfers, changes in control, and ongoing financial and technical capacity, including capacity to meet decommissioning obligations. Consider both NOPTA's own decision-making functions and its assessments and advice supporting the relevant Joint Authority, having regard to the statutory requirements concerning technical advice, financial resources and, where applicable, applicant suitability that govern each decision. Identify any remaining gaps or unintended duplication and publish practical improvement actions.

Compliance requirements

NOPTA describes its compliance approach as principles-based, with an emphasis on voluntary compliance and maintaining the integrity of the offshore licensing framework. Industry participants support effective, risk-based compliance oversight and accept that repeated failure to meet work-program or reporting obligations should attract greater scrutiny in future titles decisions.

However, the central issue in the compliance burden is proportionality and transparency. Industry participants seek clearer guidance on how historical non-compliance is weighed alongside its seriousness, remediation and sustained subsequent compliance. Existing guidance addresses past performance and applicant suitability but could better explain how these factors inform NOPTA's

assessments and advice and decisions by the relevant statutory decision maker. Recognition of remediation should not displace statutory requirements to consider relevant past conduct.

Australian Energy Producers acknowledges the historic function of Good Standing Agreement (GSA) mechanisms in addressing unmet exploration commitments during the review period. The exploration work-bid permits guideline states that Joint Authorities will not offer or enter into further GSAs from 9 December 2025, while existing GSAs remain subject to transitional arrangements and their applicable terms.

Separately, industry participants report overlapping requirements to provide corporate, financial and operational information to multiple Commonwealth regulators. New reporting should be introduced only where a clear regulatory need is demonstrated and duplication is avoided.

Recommendations

- Clarify and consolidate existing compliance guidance to explain how the seriousness, duration and recurrence of non-compliance, alongside cooperation, remediation and subsequent performance, inform NOPTA's assessments, advice and decisions, and decisions reserved to the relevant Joint Authority. This guidance should reflect the statutory requirements applicable to each decision.
- Establish a transparent process for recognising remediation and sustained subsequent compliance, without displacing statutory requirements to consider relevant past conduct.
- Distinguish isolated administrative errors from persistent or material non-compliance and align monitoring intensity with risk and behaviour.
- Work with NOPSEMA and other agencies to implement a "report once, use many times" model for corporate, financial and titleholder information, subject to legislative confidentiality requirements.
- Maintain a single, current and accessible register of required forms and guidance, particularly Forms 8, 9 and 10, with version control and clear commencement arrangements.
- NOPTA should consult industry and undertake regulatory impact analysis before introducing additional annual financial reporting to demonstrate why it is needed, that it is proportionate and that it does not duplicate existing requirements.

Digital improvements

Digital administration is a notable strength of Australia's offshore titles framework. NOPTA launched the revised NEATS public website on 2 February 2021. An update on 11 October 2022 enabled titleholders and applicants to submit applications and relevant forms electronically and track application progress. In October 2024, NOPTA announced a redeveloped NOPIMS website, developed in collaboration with Geoscience Australia and the then Western Australian Department of Energy, Mines, Industry Regulation and Safety (DEMIRS), to improve access to offshore well and survey information. NOPIMS is now integrated with NEATS, with further integration planned.

These developments provide a strong base for a modern titles administration system. Industry participants nevertheless report that NEATS often functions more as a lodgement platform than a complete case-management and communication environment. Reported workarounds include retaining screenshots, separately notifying NOPTA after electronic submissions, managing file-size limits through multiple submissions and seeking clarification when the displayed status appears inconsistent with later advice.

Limited automated acknowledgement and notification also reduces confidence that applications have been received and progressed. The next stage of development should therefore prioritise reliability, traceability, two-way communication and integration between NEATS, NOPIMS, payments, reporting and data submission.

Recommendations

- Provide an immediate automated receipt for every submission, with a unique identifier, timestamp and clear list of files received.
- Expand status visibility and automated notifications for key milestones, requests, referrals, decisions and changes to expected timing.
- Enable secure two-way communication within the portal, preserving a complete history of correspondence, submissions, requests and responses.
- Increase file-size capacity and support resumable or structured uploads so large technical packages do not require fragmented submissions.
- Integrate applications, payments, reporting and data submissions through a single point of entry, supported by digital signatures and role-based access.
- Improve reporting and data-export functionality for titleholders and ensure publicly releasable NEATS and NOPIMS information can be downloaded in reusable formats.
- Apply user-focused design, accessibility testing and structured industry testing before material releases, followed by published release notes and a known-issues register.
- Create a shared data architecture with Geoscience Australia and relevant agencies to reduce duplication and improve the consistency of titles, acreage and geoscience information.

Cost recovery and productivity

NOPTA's cost-recovery arrangements should demonstrate a transparent relationship between the costs recovered, the functions performed and the service outcomes delivered. The review should examine cost allocation across petroleum, GHG storage and other functions, including potential cross-subsidisation, and identify opportunities to reduce administrative costs without compromising regulatory outcomes. Industry should be consulted on efficiency, technology and process-improvement initiatives, not only proposed fee changes.

Recommendations

- Publish cost drivers, allocation methodologies and the utilisation of recovered funds, distinguishing petroleum and GHG storage activities and identifying any shared costs allocated to other functions, to make any cross-subsidisation transparent.
- Undertake an independent productivity audit before further fee or levy increases, supported by a published efficiency roadmap identifying opportunities to streamline functions and reduce administrative costs.
- Link proposed fee or levy increases to measurable service and productivity commitments, with annual reporting on turnaround times, aged applications, cost per transaction and efficiency gains.
- Publish a technology and digital productivity roadmap identifying suitable opportunities for automation of low-risk application processes, AI-assisted document processing and other decision-support tools, and data-management improvements. Include human oversight, information-security controls, transparent governance, implementation milestones and expected cost and turnaround-time benefits.