

14 November 2024

Director of National Parks
Draft South-east Marine Parks Network Management Plan 2025
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RE: *South-east Marine Parks Network Draft Management Plan*

Thank you for the opportunity to comment on the proposed draft management plans for Australia's South-east marine reserve network.

Australian Energy Producers (formerly APPEA) is the peak body of the explorers and producers of essential energy – oil, gas and lower-emission fuels. Our members are committed to sustainable resource development by protecting the environment and maintaining public health and safety during all phases of our operations.

Natural gas is essential for reaching net zero in Australia and the region. The Federal Government's Future Gas strategy, released in May, confirms the vital role for natural gas in Australia's energy mix to 2050 and beyond.¹

Natural gas provides the firm dispatchable energy required to unlock large-scale renewable energy deployment, and powers Australian industries across the economy including those processing the critical minerals necessary for net zero. The Australian oil and gas industry is also central to delivering key step-change emissions reductions technologies such as carbon capture, use and storage (CCUS) and low-carbon hydrogen.

The Future Gas Strategy also recognised that continued investment in new gas supply is needed to meet Australia's long-term gas demand and enable net zero transformation in Australia and the region.

"Gas will support our economy during the transition to net zero and will remain a critical part of the energy landscape in 2050 and beyond... Without continued investment in Australia's gas sector, both the east and west coast markets could experience gas price and supply volatility... Without further investment in new gas supply and gas infrastructure, these shortfalls will negatively affect Australian households and businesses, and the reliability of our electricity system," the Strategy found.²

¹ <https://www.industry.gov.au/sites/default/files/2024-05/future-gas-strategy.pdf>

² Future Gas Strategy, pp17, 30

Australia's oil and gas industry has worked productively with all governments on the marine reserve network since Australia committed to establish the network in 1993. Importantly, there has been support for the principle of designing a network that strikes an appropriate balance between environmental, social and economic considerations.

Australian Energy Producers does not support the proposal to change the existing zoning and limit new petroleum and carbon capture and storage activities (including exploration) in the multiple-use marine zones. We firmly believe that where the conservation values of a multiple use marine reserve can be maintained, marine reserves should continue to allow for sustainable resource use.

The proposal to restrict new gas and CCS activity (including exploration) in the management plan also sends mixed messages to the global investment community. Exploration activity in Australia has already declined to historically low levels amid increased regulatory uncertainty and delays. Geoscience Australia estimates petroleum exploration activity in Australia has fallen by 75 per cent in the last decade.³

However, Australia's future energy security is contingent on continued gas exploration and development. The Future Gas Strategy found, "Without future investment, there are real risks gas will become unaffordable and unavailable to Australian households and industry well before 2050. Accordingly, further exploration, acreage release and gas production will be required."⁴

Offshore petroleum and CCS activities are subject to rigorous environmental assessment by an independent government regulator. Environmental impacts are reduced to as low as reasonably practicable, minimising risks to acceptable levels. This proven process allows a flexible approach to delivering environmental protection, reflecting the specific circumstances of individual locations and projects.

While Australian Energy Producers does not support additional restrictions on oil and gas and CCS activities, if these changes are implemented we reiterate the need to provide certainty to existing petroleum titles in the marine park areas – including the usual extension and retention lease provisions available to them.

In announcing the draft management plan, Environment Minister Tanya Plibersek said in the media release, "Existing oil and gas acreage rights and licenses are completely unaffected by this proposal."⁵ This Government commitment needs to be made explicit in the final plan and reflected in future decisions by NOPSEMA and DCCEEW.

³ <https://www.ga.gov.au/aecr2024/gas>

⁴ Future Gas Strategy, p30.

⁵ <https://minister.dcceew.gov.au/plibersek/media-releases/turbocharging-ocean-protection-south-east-australia>

These parks were designed to allow sustainable resource development and companies have made significant investment on the basis of the certainty provided in the establishment of the park network.

The South-east Commonwealth Marine Reserves Network Management Plan 2013-23 acknowledged that conservation activities and sustainable use can be mutually beneficial. Where the conservation values of a reserve can be maintained, marine reserves should allow for sustainable resource use utilising constructive, objectives-based approaches.

Australian Energy Producers supports the implementation of risk multiple-use marine reserves to allow industry the capacity and flexibility to adopt innovative concepts or new technology in these areas to explore and develop potential resources without presenting a threat to conservation objectives.

Oil and gas activities have been undertaken in a safe and sustainable manner in many of these areas for decades and should continue to do so.

Yours sincerely,

Victor Violante

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