

14 September 2020

Critical Infrastructure Centre
Australian Border Force
By email

Thank you for the opportunity to comment on the *Protecting Critical Infrastructure and Systems of National Significance* Consultation Paper and workshop presentation.

The Australian Petroleum Production & Exploration Association (APPEA) is the peak national body representing upstream oil and gas explorers and producers active in Australia. APPEA's member companies account for more than 90 per cent of Australia's petroleum production. Further information about APPEA can be found on our website, at www.appea.com.au.

APPEA supports the Australian Government's commitment to protecting essential services relied on by Australians. Indeed, the protection of such services from interference and disruption should be an overarching objective of government.

While individual APPEA members may provide their own comments in relation to the specific proposals contained in the consultation paper and arising from the workshop, APPEA wishes to make the following observations.

Additional reporting burden

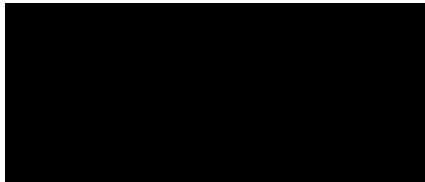
The Australian oil and gas industry works with different federal, state and territory agencies and departments as a core part of its activities. These reporting requirements to government is extensive and covers such issues as canvassed in the Department's consultation paper.

Engagement, consultation, and reporting is especially focused through the Department of Industry, Science, Energy and Resources (DISER) and the independent offshore regulator, National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). With the overall objective of improving industry performance, NOPSEMA has a function to promote and advise on health and safety, well integrity and environmental management matters. For any offshore petroleum or greenhouse gas storage activity to commence, an oil and gas company must first submit relevant risk management plans to NOPSEMA for assessment and acceptance. Submitted plans can include safety cases, well operations management plans, offshore project proposals and environment plans.

Some of the information sought by the Department as canvassed in its presentation and Consultation Paper is already provided by industry to government through approved safety cases and state-based major hazard facility license requirements. Any additional reporting requirements should be very clear and certain of what information is being requested and how this information is being used to protect infrastructure. In APPEA's view, if cyber security is to be extended to oil and gas facilities, NOPSEMA should be the Agency through which oil and gas companies continue to interact. This would assist in streamlining and reducing duplication of reporting requirements.

APPEA wishes to register its ongoing interest in the Department's consideration of the oil and gas industry's role as critical infrastructure and its desire to be consulted on sector specific regulations.

Yours sincerely



Andrew McConville
Chief Executive