

Do you believe the proposed regulations will encourage investment in the onshore conventional petroleum sector in Victoria?

Yes

If not, what would you like to see improved?

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Do you believe the proposed regulations adequately support community engagement and consultation?

Yes

If not, what would you like to see improved?

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What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to notice/submissions as part of application process for authorities (e.g. retention and production titles)?

It appears that the requirement of the application to contain details on how an applicant would engage with community over the term of the authority is a reasonable start. I would like to see some expectation of what this might consist of 'prescribed'. This should include definition of relevant individuals to be engaged/consulted.

What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to notice/submissions as part of Operation Plan?

It appears that this prescribed requirement for details of who notices are sent to and how matters are considered and addressed is reasonable.

What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to requirements for community engagement during the life of exploration, retention and production titles (as required in the title application)?

See 3 above

What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to requirements to describe community engagement during operations (as required in the Operation Plan)?

Appears reasonable

Do you have any suggested improvements to the proposed regulations?

Yes

If yes what are your suggested improvements to the proposed regulations?

I would like to see a definition included regarding the term "for the life of the well"

Further I think that the level of penalty points for not meeting requirements is inadequate in relation to the potential risks and should be much higher.

Do you believe the proposed regulations ensure that social, economic and environmental factors are adequately considered in decision-making for grant of Exploration, Retention and Production Titles?

No

If not, what would you like to see improved?

I understand that a decision has been made that further gas must be procured however the widely documented environmental consequences of continuing to extract and burn fossil fuels far outweigh the need for continued gas extraction.

Do you believe that the proposed regulations ensure that social, economic and environmental factors are adequately considered in decision-making for Operation Plan approval/variation and authority surrender?

Yes

If not, what would you like to see improved?

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Are the proposed operation plan requirements to manage risks and impacts likely to be effective specifically as they relate to environment management plans, well operation management plans, code of practice of well operations management and rehabilitation plans?

Yes

If not, what would you like to see improved?

In fact on paper these plan requirements sound detailed and if done would be as effective as an imperfect process allows. I am concerned however that much risk management that I note in practice becomes a tick and flick exercise. I believe that to properly look after our environment we need a system of external inspection and oversight.

This comment also relates to 14, 15, 16, 17 below

Are the proposed information and reporting requirements likely to be effective specifically as they relate to progress against a work program?

Yes

If not, what would you like to see improved?

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Are the proposed information and reporting requirements likely to be effective specifically as they relate to rehabilitation undertaken and changes in liability?

Yes

If not, what would you like to see improved?

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Are the proposed information and reporting requirements likely to be effective specifically as they relate to results of monitoring undertaken?

Yes

If not, what would you like to see improved?

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Are the proposed information and reporting requirements likely to be effective specifically as they relate to community engagement undertaken?

Yes

If not, what would you like to see improved?

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Are the proposed information and reporting requirements likely to be effective specifically as they relate to operational activities?

Yes

If not, what would you like to see improved?

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Are the proposed information and reporting requirements likely to be effective specifically as they relate to incidents?

Yes

If not, what would you like to see improved?

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Are the proposed information and reporting requirements likely to be effective specifically as they relate to geological data?

Yes

If not, what would you like to see improved?

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Do you believe that the new regulations will provide a clear and effective administrative framework that facilitates petroleum development activities?

Yes

If not, what would you like to see improved?

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Would you like to comment on any other aspects of the proposed regulations?

Yes

If yes, please describe

I am concerned that self regulation within industry has reportedly permitted bribery within some monitoring facilities that has allowed industry to bypass some of the areas that these regulations seek to address. I hope that the Minister is up to the job. I fear that within this system even the requirements as set out may not protect our environment.

I note also an on-sold well that ended up abandoned with no-one monitoring, maintaining or decommissioning them. I desperately hope there is not one on my country.