



30 January 2019

Dr Jennifer Buckley
Committee Secretary
GPO Box 3721
DARWIN NT 0801

Dear Ms Buckley

The Petroleum Legislation Amendment Bill 2018

On behalf of the Association of Mining and Exploration Companies' (AMEC) I am pleased to comment on *The Petroleum Legislation Amendment Bill 2018*.

AMEC is the national industry association representing mining and mineral exploration companies investing in the future of the Northern Territory.

The implementation of this Bill may have unintended consequences for the mining and mineral exploration industry. Industry's concerns for the proposed amendments are:

Statutory Code of Practice

The insertion of the proposed clause 9 that amends subsection 58 (a) will make a yet to be drafted Code of Practice legally binding. This will mean every single word in the proposed Code of Practice will bear the full weight of regulation. Care will have to be taken to ensure the yet to be consulted upon Code of Practice cannot be interpreted to conflict with the Act and Regulations.

The Territory will step away from risk-based regulation to an older-style prescriptive method. This will increase the compliance burden for Government, the cost of doing business and is unlikely to lead to improved outcomes.

Inconsistent approach to third-party appeals

The current wording of review provisions eases the path for vexatious third party appeals by groups opposed to any development in the Northern Territory. The Government must ensure the Government's decision regarding open standing for merits-based reviews for the proposed Environmental Amendment Bill 2019 is consistently applied across all legislation¹.

If you would like further clarification on the views of AMEC on this important legislative reform please contact myself or Neil van Drunen.

Yours sincerely

Warren Pearce
Chief Executive Officer

¹ Media Release *RESTORING TRUST: GOVERNMENT TO AMEND DRAFT ENVIRONMENT PROTECTION BILL*:
<http://newsroom.nt.gov.au/mediaRelease/27316>