

AFANT



AFANT's submission on NOPSEMA's proposed changes to policy and guidance relating to the offshore petroleum industry

Representing recreational fishing in the NT and ensuring the quality of our sport

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AFANT's Submission

The Amateur Fishermen's Association of the NT Inc (AFANT) welcomes the opportunity to comment on the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) proposed changes to policy and guidance relating to environmental management consultation and decision-making processes for the offshore petroleum industry.

AFANT believes that significant improvements are needed in stakeholder engagement and consultation to ensure an adequate level of trust is established around the transparency of environmental management for the offshore petroleum industry.

Stakeholder Consultation and Communication

AFANT currently has strong concerns with a number of near shore oil and gas development and exploration applications. These concerns predominantly revolve around the impact of the proposed use of both two-dimensional (2D) and three-dimensional (3D) marine seismic surveys and the effect of these methods on marine life in Northern Territory and Commonwealth waters accessed by recreational fishermen.

It is recognised through seismic survey trials conducted in the Timor Reef area of the Northern Territory that seismic surveys can significantly disturb fish populations and other marine life. AFANT and the recreational fishing industry has particular concerns in regards to effect of seismic surveys on disturbing spawning aggregations and larval stages of important recreational species. As such any proposed seismic surveys have the potential to generate significant impacts and future conflict from the recreational fishing industry.

To date the majority of stakeholder consultation with AFANT by seismic exploration companies seeking approved Environmental Plans (EP) by NOPSEMA has been woefully inadequate. The Northern Territory recreational fishing industry is extremely varied and complex depending on season, environmental factors and location. As such in order to provide real and meaningful information to these companies AFANT requires sufficiently detailed and timely information on proposed seismic surveys. This has been sadly lacking and as such makes it extremely difficult for AFANT to raise any specific objections or concerns and consequently prevents NOPSEMA from effectively assessing the level of stakeholder consultation for any Environmental Plans sought.

It appears in numerous cases that seismic exploration companies are simply attempting to gain an extremely broad EP approval, both in time frame and area, so oil and gas operators

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look on them more favourably in regards to awarding exploration contracts. AFANT believes this is unacceptable and prevents meaningful, specific and thorough stakeholder consultation in which impacts and objections can be appropriately addressed.

AFANT also believes that there needs to be transparency in the process by which objections and claims of relevant stakeholders are assessed by the titleholder. We believe unless an independent third party is the deciding body in assessing the merits of any objection or claim about the adverse impact of each activity to which the EP relates, the onus upon the titleholder means that unscrupulous operators may provide insufficient or misleading information in their EP about the concerns of relevant stakeholders and if they have been appropriately assessed.

After the NOPSEMA approval process and during any exploration or extractive activity AFANT would like ongoing meaningful communication between the offshore petroleum industry and stakeholders in order to foster a culture of proactive engagement and build trust in the community in the environmental management of the offshore petroleum industry.

Conclusion

AFANT is committed to ensuring the protection and the quality of recreational fishing in the Northern Territory. We believe that in order to best protect the environment and the recreational fishing industry it is essential that considerable effort be undertaken to improve the stakeholder consultation, transparency of process and environmental performance of the offshore petroleum industry.

We would welcome the opportunity for greater engagement and consideration of AFANT's views and ideas in the development of proposed changes to policy and guidance relating to environmental management consultation and decision-making processes for the offshore petroleum industry in the Northern Territory.

Yours sincerely

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