



Australian Government
Department of Industry, Science and Resources
National Offshore Petroleum Titles Administrator

DRAFT CONSULTATION PAPER ON THE COST RECOVERY IMPLEMENTATION STATEMENT

Titles Administration

Offshore Petroleum and Greenhouse Gas Storage Act 2006

2024

Charging for regulatory activity involves government entities charging individuals or organisations in the non-government sector some or all of the minimum efficient costs of a specific government activity. The Cost Recovery Policy along with the Australian Government Charging Framework (the Charging Framework) sets out the policy under which government entities design, implement and review charging for regulatory activities. The CRIS is the public document to ensure the transparency and accountability for the level of the charging and to demonstrate that the purpose for charging, as decided by Government, is being achieved.

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1. INTRODUCTION

1.1.Purpose

This Cost Recovery Implementation Statement (CRIS) provides information on how the National Offshore Petroleum Titles Administrator (NOPTA) implements cost recovery charging for the administration of offshore petroleum and greenhouse gas (GHG) storage titles (titles administration) under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the OPGGS Act)¹, the *Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Act 2003* (the Levies Act)², and associated regulations.

It reports actual financial and non-financial performance information for titles administration and contains financial and demand forecasts for 2024-25 and 3 forward years.

This CRIS excludes the cost recovery charging for the administration of offshore electricity infrastructure (OEI) licences and offshore infrastructure activities under the *Offshore Electricity Infrastructure Act 2021* (the OEI Act)³. The cost recovery arrangements for this activity are subject to a separate CRIS⁴.

NOPTA will maintain the CRIS until the activity or cost recovery for the activity has been discontinued.

2. POLICY AND STATUTORY AUTHORITY TO CHARGE (COST RECOVER)

2.1. Government policy approval to charge for this regulatory activity

In its report *Review of Regulatory Burden on the Upstream Petroleum (Oil & Gas) Sector*⁵ (released on 30 April 2009), the Productivity Commission recommended establishing a national offshore petroleum regulator funded through full cost recovery. As part of the 2011–12 Budget, the Australian Government adopted a revised model for the regulation of the upstream petroleum sector in Commonwealth waters by establishing the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) and NOPTA instead of a single regulator⁶. Both entities were to operate on a full cost recovery basis from 1 January 2012.

2.2. Statutory authority to charge

The legal authority to impose the Annual Titles Administration Levy is contained in Part 4C of the Levies Act. The amounts are prescribed in the *Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Regulations 2022* (the Regulatory Levies)⁷.

The annual titles administration levy is payable upon the grant of a title and annually thereafter within 30 days of the anniversary of the title. Where a title is in force for less than 12 months, the levy is calculated for the period the title remains in force.

The legal authority to impose application fees can be found in Chapter 2, Chapter 3, Chapter 4, Chapter 5, and Chapter 6 of the OPGGS Act. The fees are prescribed in the *Offshore Petroleum and Greenhouse Gas Storage*

¹ Offshore Petroleum and Greenhouse Gas Storage Act 2006 (legislation.gov.au)

² Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Act 2003 (legislation.gov.au)

³ Offshore Electricity Infrastructure Act 2021 (legislation.gov.au)

⁴ <https://www.dcceew.gov.au/sites/default/files/documents/oei-cris.pdf>

⁵ <https://www.pc.gov.au/inquiries/completed/upstream-petroleum/report/upstream-petroleum.pdf>

⁶Mid-Year Economic and Fiscal Outlook 2011–12 Budget Paper No. 2, Part 2: Expense Measures

⁷ Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Regulations 2022 (legislation.gov.au)

(Resource Management and Administration) Regulations 2011 (RMA Regulations)⁸. Application fees are payable in accordance with the RMA Regulations at the time that an application is submitted for approval to enable titleholders to undertake certain regulated activities.

NOPTA is fully funded through the cost recovery charges imposed under this legislation managing the funds through an administered Special Account⁹. NOPTA does not receive an annual departmental appropriation. NOPTA recovers its costs via application fees and the annual titles administration levy¹⁰.

3. CHARGING (COST RECOVERY) MODEL

3.1. Outputs and business processes of the activity

NOPTA's purpose is to administer titles and data management for petroleum and GHG titles in Australian Commonwealth waters. NOPTA supports the management of the offshore petroleum and GHG titles by providing expert advice, administration, compliance monitoring and data management in accordance with the OPGGS Act.

NOPTA's functions include:

- Providing information, assessments, analysis, reports, advice and recommendations to the relevant decision makers under the OPGGS Act.
- Facilitating life of title administration, including compliance monitoring.
- Engaging with titleholders on their performance in meeting regulatory obligations and expectations.
- Manage the submission and release of data.
- The Titles Administrator is the decision maker for the approval and registration of a change in control of a company, transfers and dealings, and for granting of short-term petroleum and GHG titles.
- Maintain the public registers of offshore petroleum, GHG titles.
- Cooperate with the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) on matters relating to the administration and enforcement of the OPGGS Act and associated regulations.
- Ensuring petroleum resource management is undertaken in accordance with the principles of good oilfield practice.
- Secure optimum long-term recovery of petroleum.
- Field performance monitoring strategies and reporting.
- Engagement with titleholders on the management of late life assets.
- Collecting levies and fees in accordance with government policy and Titles Administrator's approved Cost Recovery Implementation Statements. Maintaining special accounts consistent with the requirements of the Public Governance, Performance and Accountability Act 2013 (PGPA Act)¹¹.

The Offshore Strategic Branch (OSB) and the Offshore Resources Branch (ORB) within the Department of Industry, Science and Resources (DISR) provides the Australian Government with policy related advice and is responsible for maintaining the OPGGS Act, associated legislative instruments and guidelines. NOPTA utilises its technical and administrative experience to contribute to the development of policy, guidance, and legislation through the OSB and the ORB.

⁸ [Offshore Petroleum and Greenhouse Gas Storage \(Resource Management and Administration\) Regulations 2011 \(legislation.gov.au\)](#)

⁹ [Offshore Petroleum and Greenhouse Gas Storage Act 2006](#)

¹⁰ See https://www.nopta.gov.au/_documents/schedule-of-fees.pdf.

¹¹ [Public Governance, Performance and Accountability Act 2013 \(legislation.gov.au\)](#)

NOPTA undertakes the functions legislated to it under the OPGGS Act, including support functions. The teams and staff involved in delivering these functions are outlined as follows.

As at 1 July 2023, NOPTA's workforce plan had 90.46 Full Time Equivalent (FTE) staff (including contractors)¹² to support the delivery of its legislated functions (including staff working on Offshore Electricity Infrastructure (OEI)).¹³ This includes 71.46 FTE in the following seven specialised teams:

1. Titles – Exploration (8.0 FTE)
2. Titles – Development (8.0 FTE)
3. Titles – GHG (7.8 FTE)
4. Technical – Exploration (4.0 FTE)
5. Technical – Development (4.0 FTE)
6. Technical – Commercial (6.26 FTE)
7. Data Management (10.8 FTE)
8. Regulatory Support (4.8 FTE)
9. Compliance Assurance and Performance (4.0 FTE)
10. OEI Team (13.8 FTE). *OEI team costs are out of scope for this CRIS.*

These specialised teams are supported by three teams:

11. Technology, Information and Geospatial Support (TIGS) (7.0 FTE)
12. Business Support Unit (BSU) (9.0 FTE)
13. Senior Leadership Group (3.0 FTE)

NOPTA's Senior Leadership Group is made up of the Titles Administrator, a Director for Petroleum Exploration, GHG Storage and Acreage Release, and a Director for Petroleum Development and OEI.

Departmental overheads

DISR provides the following support and services to NOPTA:

- workers compensation insurance premium
- property and general liability insurance premium
- governance structure (Accountable Authority instructions, delegations, departmental policies), mandatory training, financial and other departmental systems, corporate support
- standard protected desktop offering
- human resources support and payroll processing.

Costs are allocated to NOPTA and included in the cost recovery model as overheads. The 2023-24 financial year costs are estimated to be \$675,664 per year.

NOPTA shares accommodation with NOPSEMA in Perth and Melbourne, being the most cost effective option. In addition to rental and outgoings, NOPTA incurs an annual cost of \$53,412 for NOPSEMA staff administering the building lease, receptionist services and office consumables.

Outputs and business processes

¹² Sourced from NOPTA's 2023-24 workforce plan, received 06/07/2023.

¹³ The OEI team administers NOPTA's regulatory obligations under the *Offshore Electricity Infrastructure Act 2021*. The OEI team costs are out of scope for this review.

Previously, NOPTA's CRIS had not specified individual outputs within GHG. Rather, GHG was grouped as a single output¹⁴. This reflects that GHG activity undertaken by NOPTA has been in an early stage; at the last CRIS there had only been four GHG storage titles awarded.¹⁵ Since the 2022 CRIS, there has been continued growth in GHG activity and stronger evidence from NOPTA teams of the effort required for assessment and implementation of GHG related matters in the earlier stages of the GHG lifecycle. Consequently, this CRIS has expanded the single GHG output and processes to facilitate a more accurate estimation of effort on GHG (see functions 11 to 19 in Table 1).

TABLE 1: OUTPUTS AND BUSINESS PROCESSES

All references are to the OPGGS Act unless otherwise described.

No	Outputs	Process
Petroleum		
1	Acreage Release (Petroleum Exploration Permit): (Chapter 2)	Release <ul style="list-style-type: none"> – Gazettal of acreage release areas – Maintain guidance material¹⁶ for applicants
2	Petroleum Exploration Permit: (Chapter 2)	Grant, Renewal, Surrender, Expiry, Cancellation General overview of process: <ul style="list-style-type: none"> – receipt of application – assessment of application (including any procedural fairness requirements, assessment against 695YB, financial resources and technical advice available to the applicant, and consultation with NOPSEMA, where applicable) – implement the decision – dissemination of information – maintain the title register (Chapter 4) – gazettal of event (where applicable – Chapter 7) – ongoing assessment of compliance with the legislation including any conditions and expectations of the title (where applicable) – data management and reporting – develop/maintain guidance material for applicants
3	Suspension and extension; variation; exemption: (Chapter 2 and 3)	Exploration permit, Retention Lease, Production Licence, Infrastructure Licence, Pipeline Licence See item 2 for general overview of process.
4	Declaration of a Location: (Chapter 2)	Declare, Variation and Revocation See item 2 for general overview of process.
5	Retention Lease: (Chapter 2)	Grant, Renewal, Revocation, Surrender, Expiry, Cancellation See item 2 for general overview of process.
6	Production Licence: (Chapter 2)	Grant, Renewal, Surrender, Expiry, Cancellation, Termination Field Development Plans (preliminary field development plans, final field development plans and variations) Rate of Recovery & Equipment and Procedures See item 2 for general overview of process.
7	Infrastructure Licence (IL): (Chapter 2)	Grant, Variation, Surrender, Cancellation, Termination See item 2 for general overview of process.

¹⁴ See CRIS 2022 Table 1, NOPTA CRIS 2022.

¹⁵ As per 2022 CRIS modelling, NOPTA CRIS 2022.

¹⁶ Guidance material includes factsheets, application forms, submissions guidance, website, and training.

No	Outputs	Process
8	Pipeline Licence: (Chapter 2)	<i>Grant, Variation, Cease to Operate, Terminate, Surrender, Cancellation</i> See item 2 for general overview of process.
9	Special Prospecting Authority (SPA), Access Authority (AA) and Scientific Investigation Consents: (Chapter 2)	<i>Grant, Variation (AA), Extension duration (AA), Revocation (AA), Expiry, Surrender (SPA and AA), Cancellation (SPA)</i> See item 2 for general overview of process.
10	Transfers and Dealings (Chapter 4 and Chapter 5) – For petroleum	<i>Transfer of title</i> <ul style="list-style-type: none"> – Receipt of application – assessment of application (including any procedural fairness requirements, assessment against 695YB, financial resources and technical advice available to the applicant, and consultation with NOPSEMA, Joint Authorities and Responsible Commonwealth Minister, where applicable) – implement the decision – maintain the register – dissemination of information – develop/maintain guidance material for applicants <i>Dealings affecting an existing title, future title</i> See item 2 for general overview of process. <ul style="list-style-type: none"> – Receipt of application – assessment of application (including any procedural fairness requirements) – implement the decision – maintain the register – dissemination of information – develop/maintain guidance material for applicants <i>Change of company name</i> <ul style="list-style-type: none"> – Receipt of application – assessment of application (including any procedural fairness requirements) – implement the decision – maintain the register – dissemination of information – develop/maintain guidance material for applicants <i>Change of company control</i> <ul style="list-style-type: none"> – Receipt of application (including any procedural fairness requirements, assessment against 695YB, financial resources and technical advice available to the applicant, and consultation with NOPSEMA, Joint Authorities and Responsible Commonwealth Minister, where applicable) – Assessment of application – Receipt of application – assessment of application (including any procedural fairness requirements) – dissemination of information – maintain the title register – gazettal of event (where applicable) – develop/maintain guidance material for applicants
GHG		
11	Acreage Release (GHG Assessment Permit) (Chapter 3)	<i>Release</i> <ul style="list-style-type: none"> – Gazettal of acreage release areas

No	Outputs	Process
		– Maintain guidance material ¹⁷ for applicants
12	GHG Assessment Permit (including Cross-boundary permits) (Chapter 3)	Grant, Renewal, Surrender, Expiry, Cancellation See item 2 for general overview of process.
13	Suspension and extension; variation; exemption of exploration permits Suspension and extension; variation; exemption (including Cross-boundary permits (Chapter 3)	Assessment Permit, Holding Lease, Injection Licence See item 2 for general overview of process.
14	Approval for a Key Greenhouse Gas Operation (including for Cross-boundary permits) (Chapter 3)	Approval See item 2 for general overview of process.
15	Declaration of Identified Storage Formation (including within Cross-boundary permits) (Chapter 3)	Declaration, variation. See item 2 for general overview of process.
16	GHG Holding Lease (including Cross-boundary permits) (Chapter 3)	Grant, Renewal, Revocation, Surrender, Expiry, Cancellation See item 2 for general overview of process.
17	GHG Injection Licence (including Cross-boundary permits) (Chapter 3)	Grant, Renewal, Surrender, Termination, Cancellation, Site Plan, Site Closing Certificates See item 2 for general overview of process.
18	GHG Search Authority (SCH), Special Authority (SA), Research Consent (RC) (Chapter 3)	Grant, Variation (AA), Extension duration (AA), Revocation (AA), Expiry, Surrender (SPA and AA), Cancellation (SPA) See item 2 for general overview of process.
19	GHG Transfers and Dealings (including Cross-boundary permits) (Chapter 4 and Chapter 5)	Transfer of title See item 10 for general overview of process. Dealings affecting an existing title, future title See item 10 for general overview of process. Change of company name See item 10 for general overview of process. Change of company control See item 10 for general overview of process.

3.2. Costs of the regulatory activity

NOPTA allocates direct and indirect costs to each output based on management estimates of effort required.

Direct costs are estimated at \$14.2 million and are made up of:

- employee and associated expenses of the seven specialised teams (e.g. salary, superannuation, leave entitlement, learning & development, professional membership)
- employee and associated expenses of the Senior Leadership Group, and the Technology, Information and Geospatial Support team. Maintenance and support of the National Electronic Approval Tracking System (NEATS)
- National Offshore Petroleum Data and Core Repository (NOPDCR) expenses required for the management of petroleum mining sample data (cores, cuttings and gas/fluid samples).

Indirect costs are estimated at \$8.7 million annually and are made up of:

- employee and associated expenses of the Business Support Unit
- overheads – Departmental

¹⁷ Guidance material includes factsheets, application forms, submissions guidance, website, and training.

- ICT desktop services
- office accommodation and utilities
- travel
- legal

Indirect costs are allocated to the specialised teams using headcount.

TABLE 2 ALLOCATION OF COSTS BETWEEN DIRECT AND INDIRECT (AVERAGE COSTS ACROSS CRIS PERIOD 2024/25-2026/27)

	Direct cost \$ million	Indirect cost \$ million	Total cost \$ million
Petroleum - Exploration & Development	3.0	1.8	4.8
Titles - GHG	1.4	0.9	2.3
Technical - Engineering, Geoscience/Geophysics and Commercial	4.7	1.5	6.3
Data Management	1.8	2.6	4.4
Technology, Information & Geospatial Support	1.2	0.7	2.0
Regulatory Support	0.6	0.4	1.1
Compliance Assurance and Performance	0.8	0.4	1.2
Executive	0.6	0.3	0.9
Total	14.2	8.7	22.9

Operational cost drivers

NOPTA's ability to effectively administer and discharge its functions under the OPGGS Act is underpinned by access to sufficient resources, capacity, and qualified personnel. This has minimised the need to adjust charges since its inception in 2012, providing longer-term certainty to industry in this regard. Stability in the level of fees and levies is important for providing consistency for industry, supporting a more predictable investment environment.

Through its 2022 CRIS, NOPTA increased fees and levies by 10% commencing January 2022 to recover increased costs including required ICT investment and increased employee costs as a result of salary increases, new legislative requirements, and increased complexity of titles administration activities. This was the first increase in fees and levies since 2016.

As a full cost recovery operating entity, the challenge for NOPTA's cost recovery going forward is to maintain financial sustainability and effective regulation by ensuring that it is recovering the costs of its activities in an inflationary environment¹⁸ that is also complex, rapidly evolving and uncertain. NOPTA's special account can help manage year-to-year fluctuations but is not intended to manage permanent changes in volumes or cost profiles that materially impact cost recovery.¹⁹ Costs of NOPTA's petroleum and GHG activities are forecast²⁰ to increase to \$22.9 million per year (on average across the four year CRIS period commencing 1 July 2024), up 29% from \$17.7 million per year as estimated for the 2022 CRIS. If the current cost recovery arrangements remained in place, revenues would fall short of costs by \$4.3 million per year over 2024-25 to 2027-28, representing a decline from a full cost recovery model to 81% cost recovery. GHG in particular would under-

¹⁸ NOPTA's fees are not automatically indexed to keep pace with inflation.

¹⁹ NOPTA is required to maintain a special account consistent with the requirements of the *Public Governance, Performance, and Accountability Act 2013*.

²⁰ NOPTA's forecasts are generated internally from information gathered from the relevant specialised areas.

recover costs by \$3.1 million (cross-subsidised by petroleum). This indicates the current charging arrangement is not financially sustainable.

NOPTA's operational costs have increased significantly since the 2022 CRIS due to a range of key cost drivers as indicated below.

Growth in GHG activity

Government policies to decarbonise and shift to cleaner forms of energy production are stimulating industry demand for GHG titles. The offshore GHG (or carbon capture and storage (CCS)) industry is growing and is moving rapidly towards first injection. To ensure regulatory readiness for these projects, NOPTA's internal capacity and capability must also keep pace.

NOPTA currently oversees a small number of GHG storage titles,²¹ but this is expected to increase as future permits are awarded. In August 2023, the Australian Government released 10 new areas across 7 basins for exploration in Commonwealth waters off Western Australia, Victoria and Tasmania.²² The number of areas in the 2023 release is larger than the 2 areas released in 2022 and 5 areas released in 2021.²³

Collectively, NOPTA teams are currently spending about 20% of their time on GHG activities. This disproportional allocation of time (compared to petroleum) is due to the complexity of the applications being assessed and because previously untested regulatory frameworks are now being implemented. While there are strong similarities to the petroleum processes, there are also significant differences that need to be managed. This includes complex legislative and regulatory requirements for processes relating to the declaration of identified storage formations and injection licences, which is far removed from established petroleum related procedures.

A key uncertainty for NOPTA is that given offshore GHG in Australia is an emerging industry, the capability and capacity requirements to undertake GHG assessments are not fully known, particularly for later lifecycle titles where there is limited or no historical data.²⁴ However, while estimations of effort and cost for GHG activities are less certain than for petroleum assessments, it is likely that GHG applications will remain and continue to become more complex as the industry matures consistent with trends seen in petroleum.

Increased transactions and a maturing oil and gas industry²⁵

The Australian offshore petroleum industry is maturing and is expected to become increasingly more complex over the next decade. Within the industry, cost pressures, economic uncertainty, and a decommissioning²⁶

²¹ As at 16 October 2023, there was 6 active GHG Assessment Permits and one pending application listed on NEATS.

²² 23 August 2023, Department of Industry Science and Resources, *2023 offshore greenhouse gas storage acreage release*, <https://www.industry.gov.au/publications/2023-offshore-greenhouse-gas-storage-acreage-release>.

²³ <https://www.industry.gov.au/mining-oil-and-gas/offshore-greenhouse-gas-storage/offshore-greenhouse-gas-storage-acreage-release-process>.

²⁴ Noting all current GHG titles are Assessment Permits with no Holding Leases or Injection Licences yet approved.

²⁵ For example, larger operators selling declining and marginal fields to smaller, lower cost operators or fragmentation of ownership.

²⁶ As per NOPTA's 2022 Decommissioning Guidelines, decommissioning is a normal activity in the offshore petroleum lifecycle. Its purpose is to remove or otherwise satisfactorily deal with, in a safe and environmentally responsible manner, structures, equipment and property previously used to support activities in the offshore area. This includes plugging and abandoning wells, rehabilitating the site and carrying out any necessary monitoring.

‘wave’ all serve to create a complex and challenging operating environment for NOPTA. These challenges occur against the backdrop of the Australian Government’s commitment to net-zero by 2050.

An increase in commercial transactions (transfers and dealings or change in control) between titleholders is part of the observed longer-term trend of a maturing offshore petroleum industry. Moving forward, NOPTA expects to see an increase in the frequency and complexity of these transaction types as industry seeks to review and consolidate assets in line with their internal company goals and strategies. For example, while the total number of applications received since 2018-19 has remained relatively flat, transfers and dealings continue to make up over 60% of applications since 2021-22 [ref AroA].

With increasingly complex titles transactions likely, and new administrative requirements on NOPTA under section 695YB and 695YC of the OPGGS Act²⁷, NOPTA must ensure it has sufficient resourcing and access to the right depth of capabilities to undertake these assessments. Within this, NOPTA must maintain a clear understanding of the current commercial and economic conditions of projects; confirm the technical capacity of applicants to decommission infrastructure; and provide advice to the responsible Commonwealth Minister on the financial capacity of titleholders to meet future decommissioning obligations (as requested). This trend is expected to continue as more titles reach late life, are surrendered, and decommissioning of projects commence.

Increasing employee, contractor, and supplier costs

Employee costs are NOPTA’s largest cost driver. Since 1 January 2022, NOPTA’s personnel levels (inclusive of contractors) has increased from 71.64 FTE to a projected 90.46 FTE by 30 June 2024, an increase of 26%. The increase is driven by the recruitment of additional staff to fill known capacity and capability gaps (as noted above) and as acknowledged in the 2020 Operational Review of NOPTA²⁸. Over this time staff salaries have been maintained in-line with the DISR 2019-2022 enterprise agreements²⁹. DISR has recently agreed a new enterprise agreement with a wage increase in the range of 3.4% - 4.0% per year through to 2026³⁰.

Given the tight labour market and pressure on wages (including that NOPTA is competing with the private sector for specialised expertise), increasing employee costs represents a significant risk to NOPTA’s financial performance. The cost of contractors, which represent about 12%³¹ of NOPTA’s workforce, are not covered by the enterprise agreement.³² NOPTA continues to be proactive in managing such risks. Initiatives include the use of fixed-term contracts, non-ongoing and part-time work, and ongoing improvements to operating efficiency through technology-driven developments. While NOPTA intends to continue these arrangements, these initiatives are not sufficient to prevent the need to increase fees and levies at this time.

Increasing supplier costs also represent a significant financial risk for NOPTA. NOPTA’s ICT systems for supporting the delivery of titles administration activities are primarily delivered through outsourcing arrangements with service providers, covering application managed services and infrastructure managed services. Consistent with other areas of the economy, NOPTA’s service and supplier costs have continued to

²⁷ On 2 September 2021, changes to the OPGGS Act imposed new administrative requirements on NOPTA. These include widening the applications to which an assessment of the applicant’s financial and technical capacity applies, creating new extended decision-making criteria for the initial grant of permits, the grant of pipeline and infrastructure licences, and decisions for transfers and change of control (section 695YB and 695YC), as well as a new ‘change of company control’ application.

²⁸ <https://www.industry.gov.au/publications/national-offshore-petroleum-titles-administrator-review-2020>

²⁹ <https://www.industry.gov.au/data-and-publications/enterprise-agreement-2019-2022>

³⁰ <https://www.apsc.gov.au/apsbargaining#aps-wide-bargaining-statement-of-common-conditions-2023>

³¹ <https://www.nopta.gov.au/documents/NOPTA-Annual-Report-of-Activities-2022-23.pdf>, p. 18

³² <https://www.industry.gov.au/data-and-publications/enterprise-agreement-2019-2022>

increase in line with consumer price index (CPI). This trend is expected to persist for some time consistent with the Reserve Bank of Australia's inflation forecasts³³.

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³³<https://www.rba.gov.au/publications/smp/2023/nov/overview.html#:~:text=Inflation%20in%20Australia%20has%20passed,of%20%E2%80%933%20per%20cent.>

TABLE 3 ALLOCATION OF COSTS BETWEEN DIRECT AND INDIRECT FOR EACH ACTIVITY (AVERAGE COSTS ACROSS CRIS PERIOD 2024/25-2026/27)

	Direct cost \$ million	Indirect cost \$ million	Total cost \$ million
Petroleum			
Acreage Release	0.6	0.5	1.1
Petroleum Exploration Permit	1.7	1.7	3.5
Suspension and extension; variation; exemption of exploration permits	2.2	1.2	3.4
Declaration of location	0.3	0.1	0.5
Retention lease	2.0	1.3	3.3
Production Licence	0.4	0.2	0.6
Field development plan	1.0	0.6	1.6
Rate of recovery	0.6	0.3	0.9
Infrastructure licence	0.2	0.1	0.3
Pipeline licence	0.6	0.3	1.0
SPA and AA	0.2	0.1	0.2
Transfers and dealings	1.6	0.8	2.4
GHG			
Acreage Release (GHG Assessment Permit)	0.3	0.2	0.5
GHG Assessment Permit including Cross-boundary permits	0.1	0.0	0.1
Suspension and extension; variation; exemption of exploration permits	0.1	0.0	0.1
Approval for a Key Greenhouse Gas Operation including for Cross-boundary permits	0.3	0.1	0.5
Declaration of Identified Storage Formation including within Cross-boundary permits	0.9	0.4	1.3
Variation of declaration of storage formation	0.2	0.1	0.3
GHG Holding Lease including Cross-boundary permits	0.1	0.0	0.1
GHG Injection Licence including Cross-boundary permits	0.6	0.3	0.9
Search Authority (SCH), Special Authority (SA), Research Consent (RC)	0.1	0.0	0.1
Transfers and Dealings (including Cross-boundary permits)	0.1	0.1	0.2
	14.2	8.7	22.9

3.3. Design of the regulatory charge

NOPTA's cost model has been designed to ensure stable revenue to enable effective regulation and management of its Special Account in line with the Australian Government Cost Recovery Policy (CRP). NOPTA's cost recovery charges include an annual levy imposed on different types of titles (permits, leases and licences) and fees charged on applications made to the Titles Administrator for the approval of various matters relating to offshore petroleum and GHG titles. NOPTA has minimised the need to adjust charges since its inception in 2012, providing longer-term certainty to industry in this regard. Stability in the level of fees and levies is important for providing consistency for industry, supporting a more predictable investment environment.

Through its 2022 CRIS, NOPTA increased fees and levies by 10% commencing January 2022 to recover increased costs including required ICT investment and increased employee costs as a result of salary increases, new legislative requirements, and increased complexity of titles administration activities. This was the first increase in fees and levies since 2016.

Key issues and risks that NOPTA is currently managing include increasing activities relating to the regulation of GHG, including both implementation of the GHG regulatory framework and assessment of higher volumes of GHG applications, increase in the complexity of titles administration activities consistent with a maturing industry, and the consolidation of petroleum titles, and increasing employee, contractor, and supplier costs, see 3.2. *Costs of the regulatory activity*.

NOPTA is proposing revised charging arrangements that represents a transition pathway to full cost recovery for GHG. The proposed increase in fees and levies, reduces the current level of cross-subsidisation for GHG, but recognises that full cost recovery is not yet feasible in this early stage of the sector's development.

These revised arrangements are in line with the primary objectives of cost recovery for NOPTA:

- ensure stable revenue to enable effective regulation and management of its Special Account including full cost recovery of petroleum and GHG regulatory activities.
- encourage continued exploration and innovation within industry.
- develop levies and charges in accordance with the CRPs.

NOPTA will maintain full transparency by notifying and consulting industry where required prior to any potential future increase.

Cost recovery annual levy

Annual levies are used to fund NOPTA activities where it is not possible or practical to attribute costs to a specific title (e.g., data management, resource management, compliance and enforcement).

The annual levy makes up the majority of NOPTA's revenue, approximately 90.5% in the 2022-23 CRIS, providing a stable revenue stream that is dependent upon the current number and type of titles in force. Annual levy revenue estimates are based on the existing number of titles incorporating known upcoming activities (e.g. acreage release grants, surrenders, expiries, title conversions etc.) and industry trends.

The structure for the annual levy is relatively easy to calculate, involving a:

- fixed rate per title for an exploration permit, infrastructure licence, assessment permit
- fixed rate multiplied by a known number of kilometres or part thereof for a pipeline licence,
- fixed rate multiplied by a known number of blocks for a production licence, retention lease,
- fixed rate per licence for holding lease or gas injection licence.

Consistent with the principles of the CRP,³⁴ levy amounts have been designed to encourage continued exploration and innovation within industry. While this does result in a degree of over/under recovery across some levy categories, this is considered reasonable. For example, under the current levy structure, the revenue collected for exploration permit activities is less than estimated administrative costs, while the revenue collection from retention lease and production licence title activities is more than the estimated administrative costs. Under this arrangement, cross subsidy has been minimised by aligning administrative effort with the number of blocks within a title. For example, while a production licence may only include a few blocks, the technical administrative effort is high. While for other title types, such exploration permits or infrastructure licences, the number of blocks does not impact as much on effort. This is reflected in the levy structure (see below Table 4).

³⁴ Australian Government Cost Recovery Policy | Department of Finance, section 11, which states that key considerations for whether cost recovery is appropriate include the impact of cost recovery on competition, innovation or the financial viability of those who may need to pay charges and the cumulative effect of other government activities.

The greenhouse gas holding lease levy and the greenhouse gas injection licence levy are now charged per licence, rather than per block, making these levies more equitable and reflecting that the number of blocks does not impact as much on effort.

50% of NOPTA's costs in relation to GHG activities will be recovered under the proposed arrangement. It provides for a graduated transition to full cost recovery of GHG with the opportunity to assess GHG activity numbers and costs of administering GHG titles over the next CRIS period. This is consistent with the CRP, which states that partial cost recovery may be appropriate in some circumstances, including where charges are being 'phased in'³⁵. It should be noted that complex activities in the later stages of the GHG lifecycle such as holding leases and injection licences have not been undertaken by NOPTA yet, and the costs of which will be reviewed regularly.

It is NOPTA's view that the current levy structure is equitable and proportionate to the regulatory and administrative complexity of the current titles regime. NOPTA is proposing to maintain the current levy structure but with an average 11% increase to petroleum levies, and an average 141% increase to GHG levies. The considerable increase to GHG levies reflects a re-balancing to increase the cost recovery level of GHG.

This level of increase in the levies is required to ensure NOPTA's financial sustainability going forward. During the covid pandemic many expenses either remained stable or decreased. Post covid many costs have rebounded and are reflected in the proposed revenue structure. Key issues and risks that NOPTA is currently managing include growth in GHG activity and continued implementation and application of the new GHG assessment process, increased transactions and decommissions associated with aging assets and a maturing industry. These factors have led to a substantial increase in NOPTA's employee costs and are reflected in the proposed levies.

TABLE 4 ANNUAL TITLES ADMINISTRATION LEVY REVENUE ESTIMATE FROM 1 SEPTEMBER 2024³⁶

Title Type	No. of titles	No. of blocks	Length Km	Current levy rate (\$)	Proposed levy rate from 1 Sept 2024 (\$)	Levy amount (\$)	Outputs funded
Work-bid petroleum exploration permit or special exploration permit (per title)	75			11,000	12,000	900,000	1, 2
Cash-bid petroleum exploration permit (per title)	-			11,000	12,000	-	1, 2
Boundary-change petroleum exploration permit (per title)	-			11,000	12,000	-	1, 2
Petroleum retention lease (per block)	-	318		22,000	24,500	7,791,000	5
Petroleum production licence (per block)	-	342		22,000	24,500	8,379,000	6
Infrastructure licence (per title)	3			27,500	30,500	91,500	7
Pipeline licence (per km or part thereof)	-		4,902	110	122	598,044	8
Work-bid greenhouse gas assessment permit (per title)	14			11,000	26,500	371,000	11,12
Cross-boundary work-bid greenhouse gas assessment permit (per title)	-			11,000	26,500	-	11,12

³⁵ See section 14 of the CRP.

³⁶ Using fees rounded to nearest \$500 so fee amounts slightly different to analysis in chapter 5.

Title Type	No. of titles	No. of blocks	Length Km	Current levy rate (\$)	Proposed levy rate from 1 Sept 2024 (\$)	Levy amount (\$)	Outputs funded
Greenhouse gas holding lease (per licence)	3			22,000 (per block)	106,000 (per licence)	318,000	16
Greenhouse gas injection licence (per licence)	5			22,000 (per block)	106,000 (per licence)	530,000	17
ADDITIONAL							
Consolidated work-bid greenhouse gas assessment permit (per title)	-	-		-	26,500	-	11, 12
Special greenhouse gas holding lease (per licence)	-	-		-	106,000	-	16
Special cross-boundary greenhouse gas assessment holding lease (per licence)	-	-		-	106,000	-	16
Cross-boundary greenhouse gas holding lease (per licence)	-	-			106,000	-	16
Cross-boundary greenhouse gas injection licence (per licence)	-	-		-	106,000	-	17
Levy Estimate						18,978,544	

Cost recovery application fees

Revenue from application fees fluctuates from year to year as they are dependent on the timing, type and number of applications lodged by titleholders.

In the 2022 CRIS, the revenue from application fees accounted for approximately 12% of NOPTA's total budget expenditure. The focus of NOPTA's activities in relation to title specific applications is on assessing compliance with the OPGGS Act, relevant legislation and guidelines, as well as the technical and financial ability of applicants to carry out title related activities.

The application fees are calculated by applying a fixed/flat rate to the type of application submitted.

The current charging arrangements have a single flat fee for the majority of applications. With over 50 application types, applying a standard application fee has served NOPTA well by providing clarity and understanding of cost recovery and being simple to administer. However, NOPTA has closely reviewed its effort and costs to develop a more accurate picture of what activities are driving costs. Based on this analysis, tiered fees are proposed for petroleum and GHG application fees that more closely reflect the effort required for each application activity. The tiered application fee structure, with three fee tiers for petroleum and four tiers for GHG, does not add an unreasonable level of complexity for NOPTA to administer and businesses to understand.

This CRIS will introduce application fees for activities not previously undertaken, for example applications relating to GHG holding leases and GHG injection licences. The introduction of the fees reflects the recent developments in the GHG industry.

The proposed fees increases are substantial for some application types. NOPTA has minimised fee increases over time, however, the proposed increases are now necessary to ensure NOPTA's financial sustainability in a rapidly changing environment. The proposed fee structure more accurately reflects NOPTA's effort as compared to the current fee structure.

Application fees have been estimated below in Table 5 based on forecast applications and taking into consideration industry trends. The number of application fees fluctuates according to industry activity and is difficult to predict.

TABLE 5 ANNUAL APPLICATION FEES REVENUE ESTIMATE FROM 1 SEPTEMBER 2024³⁷

Item and type of application	Estimated No. of applications	Current fee	Proposed fee from 1 Sept 2024	Fee amount	Outputs funded
101 Work-bid petroleum exploration permit (s104)	5	\$8,250	\$18,000	\$90,000	1, 2
102 Special petroleum exploration permit (s115)	0	\$8,250	\$18,000	\$0	1, 2
103 Cash-bid petroleum exploration permit (s110)*	0	\$8,250	\$18,000	\$0	1, 2
104 Renewal of petroleum exploration permit (all types, s119))	3	\$8,250	\$18,000	\$54,000	2
105 Petroleum retention lease (all types, s141 or 147)	4	\$8,250	\$25,500	\$102,000	5
106 Renewal of petroleum retention lease (all types, s153))	8	\$8,250	\$25,500	\$204,000	5
107 Petroleum production licence over a surrendered block (s178)	2	\$8,250	\$25,500	\$51,000	6
108 Petroleum production licence over an individual block (s182)	0	\$8,250	\$25,500	\$0	6
109 Petroleum production licence (other than in items 107 and 108)	0	\$8,250	\$25,500	\$0	6
110 Renewal of petroleum production licence (all types, s184))	1	\$8,250	\$25,500	\$25,500	6
111 Infrastructure licence (s198)	0	\$8,250	\$25,500	\$0	7
111A Variation of infrastructure licence (s204)	0	\$8,250	\$25,500	\$0	7
112 Pipeline licence (s217)	1	\$8,250	\$18,000	\$18,000	8
113 Variation of pipeline licence (s226)	4	\$8,250	\$18,000	\$72,000	8
114 Petroleum special prospecting authority (s234)	2	\$8,250	\$10,000	\$20,000	9
115 Approval of transfer of petroleum title (s473)	23	\$8,250	\$10,000	\$230,000	10
116 Approval of dealing relating to petroleum title (s488)	128	\$8,250	\$10,000	\$1,280,000	10
116A Request for a variation of a declaration of location (s133(1))	0	\$8,250	\$25,500	\$0	4
116AA Application for approval of change in control of a registered holder of a title (s566C)	2	\$8,250	\$10,000	\$20,000	10
117 Application for a petroleum access authority (s242)	3	\$8,250	\$10,000	\$30,000	9
118 Application for one or more of the following (s264):	24	\$8,250	\$18,000	\$432,000	3
(a) variation of conditions of permit, lease or licence;					
(b) suspension of conditions and extension of the term of permit or lease;					

³⁷ Using fees rounded to nearest \$500 so fee amounts slightly different to analysis in chapter 5.

Item and type of application	Estimated No. of applications	Current fee	Proposed fee from 1 Sept 2024	Fee amount	Outputs funded
(c) exemption from conditions of permit, lease or licence; (d) suspension of conditions of licence, permit or lease.					
119 Nomination by permittee for declaration of a location in relation to a petroleum title (s129)	2	\$8,250	\$25,500	\$51,000	4
120 Application for a consent to surrender a title (s269)	11	\$8,250	\$18,000	\$198,000	3
121 Application for a declaration of a part of a geological formation as an identified greenhouse gas storage formation (s312 or 312A)	4	\$8,250	\$40,000	\$160,000	15
122 Application for variation of a declaration of an identified greenhouse gas storage formation (s313)	1	\$8,250	\$40,000	\$40,000	15
123 Application for a greenhouse gas special authority (s415)	0	\$8,250	\$10,000	\$0	18
124 Application for one or more of the following (s436(1)) in relation to a greenhouse gas assessment permit, greenhouse gas holding lease or greenhouse gas injection licence: (a) variation or suspension of any of the conditions to which the permit, lease or licence is subject; (b) exemption from compliance with any of the conditions to which the permit, lease or licence is subject.	2	\$8,250	\$18,000	\$36,000	13
124A Application for one or more of the following (s439A(1)) in relation to a cross-boundary greenhouse gas assessment permit, cross-boundary greenhouse gas holding lease or cross-boundary greenhouse gas injection licence: (a) variation or suspension of any of the conditions to which the permit, lease or licence is subject; (b) exemption from compliance with any of the conditions to which the permit, lease or licence is subject	0	\$8,250	\$18,000	\$0	13
124B Application for a consent to surrender a greenhouse gas title (s441)	0	\$8,250	\$18,000	\$0	12
125 Application for acceptance of a field development plan (r4.04)	2	\$8,250	\$25,500	\$51,000	6
126 Application for variation of a field development plan (r4.08)	1	\$8,250	\$25,500	\$25,500	6
127 Application for permission to undertake recovery of petroleum from a petroleum pool in a licence area (r4.14)	5	\$8,250	\$25,500	\$127,500	6
128 Application for approval of the rate of recovery of petroleum from a petroleum pool in a licence area (r4.18)	-	\$8,250	\$25,500	-	6
201 Work-bid greenhouse gas assessment permit (s296)	12	\$8,250	\$18,000	\$216,000	11, 12

Item and type of application	Estimated No. of applications	Current fee	Proposed fee from 1 Sept 2024	Fee amount	Outputs funded
201A Cross-boundary greenhouse gas assessment permit (s307A)	-	\$8,250	\$18,000	-	11, 12
202 Cash-bid greenhouse gas assessment permit (s303)	-	\$8,250	\$18,000	-	11, 12
203 Renewal of greenhouse gas assessment permit (s308)	1	\$8,250	\$18,000	\$18,000	12
204 Greenhouse gas holding lease (all types)	1	\$8,250	\$25,500	\$25,500	16
205 Renewal of greenhouse gas holding lease (s347)	-	\$8,250	\$25,500	-	16
206 Greenhouse gas injection licence (s369)	2	\$8,250	\$40,000	\$80,000	17
207 Greenhouse gas search authority (s407)	4	\$8,250	\$10,000	\$40,000	18
208 Greenhouse gas site closing certificate (s386)	-	\$8,250	\$18,000	-	17
209 Application for approval of transfer of greenhouse gas title (s525)	10	\$8,250	\$10,000	\$100,000	19
210 Application for approval of dealing relating to greenhouse gas title (s539)	-	\$8,250	\$10,000	-	19
211 Approval of dealing in future interest relating to greenhouse gas title (s548)	-	\$8,250	\$10,000	-	19
ADDITIONAL					
Approval of dealing in future interest relating to petroleum title (s498)	-	-	\$10,000	-	10
Approval by responsible Commonwealth Minister of key greenhouse gas operations - general (s292 or 292A and s321 or 321A)	7	-	\$18,000	\$126,000	11
Application for a consolidated work-bid greenhouse gas assessment permit (s302A)	-	-	\$18,000	-	11
Application for a renewal of cross-boundary greenhouse gas assessment permit (s311A)	-	-	\$18,000	-	16
Application for cross-boundary greenhouse gas holding lease (all types)	-	-	\$25,500	-	16
Application for renewal of cross-boundary greenhouse gas holding lease (350A)	-	-	\$25,500	-	16
Application for a special greenhouse gas holding lease (s336)	-	-	\$25,500	-	16
Application for a special cross-boundary greenhouse gas holding lease (s342A)	-	-	\$25,500	-	16
Application for cross-boundary greenhouse gas injection licence (s368A)	-	-	\$40,000	-	17
Variations of matters specified in a greenhouse gas injection licence (s374)	-	-	\$40,000	-	17
Variations of matters specified in a cross-boundary greenhouse gas injection licence (s374A)	-	-	\$40,000	-	17
Fees Estimate	275			\$3,923,000	

4. RISK ASSESSMENT

In accordance with the Australian Government's Charging Framework a Charging Risk Assessment (CRA) was undertaken. The overall CRA rating for this CRIS has been assessed as high.

A major financial risk for NOPTA would be a significant decrease in the number of titles, specifically retention leases and production licences, given these 2 title types represent a significant proportion of NOPTA's revenue via the annual levy.

To mitigate exposure to potential downturns in the offshore petroleum industry, NOPTA aims to retain a reserve of 10% of its annual budget at the end of each financial year. This enables NOPTA to manage its cash flow as revenue fluctuates from month to month while cash outflows remain stable. For significant fluctuations in industry activity, or unexpected priorities as set by the responsible Commonwealth Minister or Joint Authority, NOPTA may engage the services of short-term contractors as appropriate.

NOPTA will continue to monitor the cost recovery arrangements to ensure that they remain cost effective and equitable among titleholders. NOPTA will actively engage with industry representatives, raising issues relating to cost structures as they arise.

5. STAKEHOLDER ENGAGEMENT

<To be completed after stakeholder engagement>

6. FINANCIAL PERFORMANCE

Financial estimates are provided below in 6.1. *Financial Estimates* based on increases occurring on 1 September 2024. As financial estimates change, the CRIS will be updated accordingly.

NOPTA will continue to assess fees and levies to ensure they are efficient, and report on cost effectiveness as part of its annual report of activities.

6.1. Financial Estimates

Financial Item	2023-24 Forecast \$'000	2024-25 Budget \$'000	2025-26 Forward Estimate \$'000	2026-27 Forward Estimate \$'000	2027-28 Forward Estimate \$'000
Total expenses	21,600	21,700	22,300	23,200	24,400
Total revenue	17,700	22,902	22,902	22,902	22,902
Balance = revenue - expenses	(3,900)	1,202	602	(298)	(1,498)
Cumulative balance	(3,228)	(2,026)	(1,424)	(1,722)	(3,220)

6.2. Financial Outcomes

Financial Item	2018-19 \$'000	2019-20 \$'000	2020-21 \$'000	2021-22 \$'000	2022-23 \$'000	2023-24 Forecast \$'000
Actuals						

Revenue = X	17,968	17,561	17,178	18,243	17,675	17,700
Expenses = Y	18,548	18,447	16,354	16,493	16,965	21,600
Balance = X – Y	(580)	(886)	824	1,750	710	(3,900)
Cumulative balance	(1,726)	(2,612)	(1,788)	(38)	672	(3,228)

7. NON-FINANCIAL PERFORMANCE

NOPTA is subject to a range of governance controls including independent statutory reviews. In accordance with section 695P(1) of the OPGGS Act, a 5 year review of the effectiveness of the Titles Administrator in contributing to the efficiency of decision making by the Joint Authority was conducted by Deloitte in 2020-21. The final report was tabled in the Commonwealth Parliament on 22 July 2021³⁸. Deloitte found since 2014-15 NOPTA has been effective and efficient in carrying out its functions under section 695B of the OPGGS Act and effective in contributing to the efficiency of the decision making by the Joint Authority.

In the 2023-24 Portfolio Budget Statements, NOPTA's performance measure is published assessment timeframes for applications made under the OPGGS Act are met 90% of the time. In 2022-23 NOPTA met target application assessment timeframes 97% of the time for petroleum and GHG storage applications.

NOPTA provides input for the DISR's broader annual reporting process pursuant to its requirement under s695N of the OPGGS Act. NOPTA also publishes a separate annual report of its activities, which is consistent with its input into the department's annual report but is expanded to provide a broader overview of NOPTA's operations and can be found on the NOPTA website³⁹.

NOPTA stakeholder survey

As part of NOPTA's ongoing performance reporting obligations, NOPTA undertakes regular stakeholder surveys to assess client satisfaction with its performance in key areas. In May 2023 NOPTA engaged KPMG to undertake its 2023 Stakeholder Survey. The survey was focused on the Titles Administrator function only. This was NOPTA's sixth comprehensive survey of stakeholder views. Stakeholder feedback has provided us with important insights in the areas of accessibility of information, regulatory effort, resource management, communication, cost recovery and risk. The outcomes of the survey represent an excellent result for NOPTA. Some of these key highlights were:

- NOPTA's role is very well understood, with 76% of stakeholders understanding NOPTA's role to a great extent.
- The majority of respondents were either very or somewhat satisfied with the technical expertise of NOPTA staff (100%)
- All stakeholders thought that NOPTA makes a valuable contribution to the process of managing Australia's resources to a great extent or some extent (100%)
- Respondents largely viewed NOPTA's current fees and levies as very reasonable or reasonable (88%)

We also obtained feedback regarding areas where stakeholders consider NOPTA's performance could be improved. These include matters relevant to collaboration with stakeholders, timeliness of decisions, regulatory effort, and providing additional support with new legislative requirements. NOPTA is actively pursuing a range of priorities to optimise our performance and enhance the processes through which we collaborate and engage

³⁸ See 2020 Operational Review of the National Offshore Petroleum Titles Administrator

³⁹ NOPTA.gov.au

with our stakeholders. Our online portals and systems are under constant improvement and have had recent upgrades to facilitate online submissions, as well as ongoing work to streamline our internal assessment processes to improve timeframe efficiencies and better track and report on application processing performance. NOPTA will continue to improve its communications and engagement with stakeholders and will refine its communication strategy accordingly.

8. KEY FORWARD DATES AND EVENTS

May 2024	Stakeholder Engagement
June 2024	Amend draft CRIS to incorporate stakeholder engagement outcomes
June 2024	Submit draft CRIS and Charging Risk Assessment to the Department of Finance
Jun/Jul 2024	Ministerial approvals of final CRIS
1 Sept 2024	Implementation of CRIS update, estimated date

9. CRIS APPROVAL AND CHANGE REGISTER

Date of change	CRIS change	Approver	Basis for change
DD/MM/YYYY	Approval for the CRIS release	Finance Minister	High CRA rating charging activity
DD/MM/YYYY	Update of financial estimates	Title of accountable authority	Changes in assumptions (e.g. at Additional Estimates)
DD/MM/YYYY	Update description of costs and charges	Title of responsible Minister	Changes in costs of resources
DD/MM/YYYY	Amend description of business processes	Title of accountable authority	Revalidation of the costing model (operational change)
DD/MM/YYYY	Amend description of the activity and cost recovery model	Government	Addition of a new group of fee payers (policy change)