

30 January 2024

Hon Stephen Jones MP
Assistant Treasurer and Minister for Financial Services
c/o PreBudgetSubmissions@treasury.gov.au

Dear Assistant Treasurer and Minister for Financial Services

Australian Government Budget Submission 2024-25

The Australian Marine Oil Spill Response Centre (AMOSC) welcomes the opportunity provided by the Australian Government, 1 December 2023, to provide a submission during the consultation process for the Commonwealth Budget 2024-25.

Introduction

Users of the maritime domain, e.g., industries including transport and energy, are required to adhere to regulatory requirements covering engineering, human resourcing and process standards that prevent incidents leading to pollution at sea.

Activities are regulated by either the Australian Maritime Safety Authority (AMSA) – Australia's shipping regulatory – or the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) - Australia's independent offshore energy regulator.

AMSA manages Australia's National Plan for Maritime Environmental Emergencies (NatPlan). Mostly focussed on shipping, the NatPlan is recognised as a robust and sophisticated framework that sets out national arrangements, policies and principles for response to maritime emergencies. AMSA also undertakes specific agency led activities to prevent and respond to maritime incidents.

NOPSEMA requires title holders (i.e., energy companies operating or proposing to operate offshore facilities) to prepare plans for acceptance that demonstrate safe and environmentally responsible operations. This includes the means necessary to respond to all levels of potential marine pollution incidents, be they minor or major.

States and the Northern Territory also exercise regulatory responsibilities in the maritime domain, within their jurisdiction.

AMOSC

AMOSC was established in 1990 by the Australian oil and gas industry, to provide marine liquid hydrocarbon spill response capacity to member companies and government response agencies. Today, AMOSC has 27 members, four equipment stockpiles, and delivers internationally accredited training with two significant training and administration centres (North Geelong & Fremantle). AMOSC is an active participant in both international and domestic work programmes to ensure that world's best practise clean up measures and techniques can be deployed in Australian waters.

AMOSC capabilities' range all aspects of marine spill response, and are able to be deployed in the offshore, near-shore and shoreline environment. These capabilities span maritime, aviation and subsea domains. AMOSC's capabilities were designed from the outset to play the role of provider of industry resources, as part of a shared national capacity for maritime pollution response.

Current state

Despite arrangements and mitigants, accidents can occur, and when they do government and industry need to ensure that swift and effective pollution response mechanisms are able to appropriately manage clean-up efforts.

Due to the jurisdictional control of Australia's maritime domain, and the nature of industry users, response efforts will nearly always involve coordination and cooperation between States and Territories, the Commonwealth and industry. The system of response is complex and layered, with duplication of efforts and resources. This has led to inefficiencies, and inconsistencies have arisen over time. As new risks arise driven by efforts towards decarbonisation, current scarce resources will need to be re-allocated to meet mitigation and consequence management in the maritime domain.

AMOSC encourages consideration by the Australia Government to pursue regulation and policy change that **optimises response efforts** via adjustment of the current settings and arrangements.

Key amongst these are efforts that will **reduce duplication and expenditure**, with a focus on **stronger shared resources** able to be deployed agnostic to the source of pollution. This will support the government's broader policy objective of **stronger environmental stewardship**.

Australia's coasts and oceans hold enormous economic, cultural, social and environmental significance. AMOSC advocates for Australia's continued leadership for protection and management of Australia's marine environments and proposes Australian Government partnership and investment with industry into a centralised response organisation as Australia embraces the energy and transport opportunities of the future.

AMOSC is committed to assist with the establishment and support of this response arrangement, for the protection and welfare of the community and environment, while mitigating reputation risk in relation to activities and products of the energy industry.

Queries or questions on AMOSC's submission may be directed to Ms Claire Daly, Senior Technical Officer, Policy and Advocacy on amosc@amosc.com.au or via phone on 03 5272 1555.

Yours sincerely



Phillip Starkins
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Encl. 2024-25 Pre-Budget Submission to the Australian Government.