National Offshore Petroleum Titles Administrator

Regulator Performance Framework: 2019-20 self-assessment

Contents

Overview

NOPTA is pleased to present its fifth self-assessment against the Regulator Performance Framework (RPF). Previous self-assessments, as well as further background on NOPTA and the RPF, can be found on the NOPTA website.

NOPTA is committed to protecting the health and safety of our people and visitors. In line with Commonwealth and state government directives regarding COVID-19 precautions, all staff and contractors worked from home from March 2020 to 30 June 2020, with this arrangement continuing for staff (post 30 June) as required. The transition to working from home was successful due to NOPTA's existing ICT arrangements and embedded commitment to flexible working arrangements for staff.

Despite COVID-19 restrictions, NOPTA has maintained its strong commitment to transparency, accountability, consistency, efficiency and helpfulness. Consequently, NOPTA has assessed that the six Key Performance Indicators (KPIs) of the RPF were met during 2019-20.

In October 2019, the then Minister for Resources and Northern Australia, Senator the Hon Matthew Canavan as the responsible Commonwealth Minister under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA), issued NOPTA with an updated statement of expectations. The updated statement clarifies NOPTA's role in relation to late life assets, decommissioning and continuing to improve data quality, integration and access under the OPGGSA. In December 2019, NOPTA responded with an updated statement of intent.

In January 2020, NOPTA published its 2020-23 Strategic Plan which is aligned with the Minister's updated statement of expectations and the KPIs of the RPF. The strategic plan focuses on six priorities, including: integrating data and technology; resource management, collaboration and engagement; external compliance; internal capability; and optimising our performance. This enables clear and consistent annual reporting on NOPTA's performance which aids transparency and accountability to our stakeholders.

Under s 695(1) of the OPGGSA a review of NOPTA's operations must be undertaken every five years. Deloitte has been appointed to conduct the review of NOPTA, as well as the National Offshore Petroleum Safety and Environmental Authority (NOPSEMA), for the period 1 January 2015 to 31 December 2019. The operational review was initially delayed on request of the Department of Industry, Science, Energy and Resources (the department), and approved by the responsible Commonwealth Minister, but is scheduled to be complete by the end of 2020. NOPTA welcomes the opportunity for the independent review and looks forward to working with the department to implement any recommendations that come from the review.

NOPTA did not conduct a stakeholder survey in 2019-20. Over the past year, NOPTA has been diligent in ensuring that the valuable feedback received on our performance from the 2018-19 survey is acted upon. For this year's self-assessment NOPTA has focused on clear activity-based evidence relevant to improvement opportunities identified in 2018-19 survey, the 2020-23 strategic plan, and outcomes from internal performance and compliance reporting. NOPTA will conduct its next stakeholder survey in 2021. Outcomes relating to the 2021 survey, and 2020 operational review (where applicable), will be incorporated into next year's self-assessment.

Key achievements against KPIs over 2019-20 included:

- **KPI 1:** In consultation with industry, implemented and commenced a range of practical initiatives designed to improve the National Electronic Approvals Tracking System (NEATS),

including the redevelopment of the NEATS external website, and enhancements to the NEATS industry portal to facilitate online submissions and usability.

- **KPI 2:** Published our 2020-2023 strategic plan. The strategic plan operationalises the department's Corporate Plan in relation to NOPTA's functions and is supported by a comprehensive internal implementation strategy.

- **KPI 3:** Maintained an ongoing focus on risk management, with all staff attending a dedicated training workshop to increase knowledge and better understand implications for NOPTA's administrative framework.

- **KPI 4:** Introduced an internal assurance review process to test ongoing procedural adherence to legislative and administrative requirements under the OPGGSA and promote continuous improvement.

- **KPI 5:** Reviewed and updated NOPTA's Compliance and Enforcement Policy which is published on the NOPTA website.

- **KPI 6:** Continued to work closely with the Offshore Resources Branch of the department, and the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) on matters relevant to streamlining processes under the OPGGSA and associated regulations.

About NOPTA

NOPTA, also known as the Titles Administrator, is appointed by the Secretary of the Department of Industry, Science, Energy and Resources (the department) under section 695A of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA)*.*

NOPTA's purpose is to advise on and administer the OPGGSA in support of the effective regulation and management of our offshore petroleum resources, consistent with good oil field practice and optimum recovery. NOPTA is the first point of contact for matters relating to offshore titles administration and operates on a full cost recovery basis.

Under the OPGGSA and associated regulations, NOPTA's functions include:

- providing information, assessments, analysis, reports, advice and recommendations to the Joint Authorities and the 'responsible Commonwealth Minister'

- granting short-term titles (petroleum access authority and petroleum special prospecting authority) and decisions on the registration of transfers and dealings

- facilitating life of title administration, including compliance monitoring

- managing the collection, management and release of data

- keeping the registers of petroleum and greenhouse gas storage titles

- ensuring petroleum resource management is undertaken in accordance with the principles of good oil field practice

- implementing effective field development review and performance monitoring strategies in order to secure optimum petroleum recovery for the benefit of the Australian community.

The Joint Authorities have the power to make certain decisions under the OPGGSA. NOPTA provides advice and recommendations in relation to these decisions. All communications to or from the Joint Authority occurs through NOPTA.

NOPTA utilises its technical and administrative experience to contribute to the development of guidance and legislation through the Offshore Resources Branch (ORB). ORB is a branch of the department who provides the Australian Government with petroleum related policy advice.

The states and the Northern Territory (NT) maintain a titles administrator role in their respective state/NT waters.

NOPTA's offices are located in Perth and Melbourne.

2019-20 NOPTA self-assessment

KPI 1: Regulators do not unnecessarily impede the efficient operation of regulated entities

KPI Expectations

Regulators should always consider the legislative and authorising environment and seek to minimise the potential negative impact of regulatory activity where appropriate. Regulators should avoid imposing unnecessary costs in the design and review of policies, procedures and practices. This includes engaging with external organisations to learn and share experiences.

NOPTA's Approach

NOPTA develops and maintains policies and procedures that promote transparency, efficiency and effectiveness, and minimise compliance costs. Policies and procedures are mapped to legislative requirements, and a dedicated control library with automated review cycles ensures documents remain up to date. An internal quality assurance program tests ongoing adherence to policies and procedures, identifying areas for improvement as required.

Results: ☒ **Met**   ☐ **Partially Met**   ☐ **Not Met**

> *NOPTA assesses that it has met KPI 1. This has been achieved through a strong commitment to continuous improvement of our internal processes and active engagement with stakeholders to execute our functions in accordance with leading regulatory practice.*

During 2019-20, NOPTA:

- Implemented and commenced a range of practical initiatives designed to improve the National Electronic Approvals Tracking System (NEATS), including the redevelopment of the NEATS external website, and enhancements to the NEATS industry portal to facilitate online submissions and improve usability. These matters were considered key areas of improvement by over 80% of eligible respondents to the 2019 stakeholder survey.

  - To ensure that the rebuild meets the needs of our key stakeholders, NOPTA has been consulting with a dedicated titleholder industry user group (includes ORB), AMPLA (the Energy and Resources Lawyers Association), and the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA)).

  - Ongoing investment in NEATS is producing efficient regulatory outcomes due to the ability to automate systems and streamline interactions in a secure environment.

- Assisted ORB in the development of the COVID-19 Work-bid Exploration Permits Fact Sheet relating to interim measures to provide flexibility for offshore oil and gas explorers during the COVID-19 pandemic. Between 17 April and 30 June 2020, NOPTA has facilitated the assessment of 18 applications in accordance with this factsheet.

- Maintained a flexible approach to regulatory well and survey data submission requirements during COVID-19 restrictions (refer to stakeholder notice). (see KPI 2)

- Has been proactive in understanding emerging industry technologies and practices and in utilising this knowledge in our work. NOPTA participated in several cross-agency forums and

annual events to discuss current and emerging issues, share ideas and implement improvement strategies, including:

- the Council of Australian Governments Energy Council (COAG)[1], Upstream Petroleum Resources Working Group

- the Professional Petroleum Data Management, Regulatory Data Standards Committee

- collaborating with Geoscience Australia and WA Department of Mines, Industry Regulation and Safety on the operation of the National Offshore Petroleum Data and Core Repository; and the ongoing improvement program for National Offshore Petroleum Information Management System (NOPIMS)

- working closely with ORB and NOPSEMA on decommissioning matters with a view to streamlining processes under the relevant legislative and regulatory frameworks.

- the international National Data Repository Workgroup meetings, the PPDM Regulatory Standards Committee and other local and international focus groups concerned with data quality programs and compliance initiatives.

- ongoing engagement in a skills exchange program with international offshore petroleum regulators including the United Kingdom's Oil and Gas Authority (OGA) and New Zealand Petroleum and Minerals (NZPM), with a focus on best practice management of late life petroleum titles and matters related to decommissioning.

- Regular consultation and ideas exchange between NOPTA and international counterparts in the OGA and NZPM, has significantly contributed to our understanding of contemporary and emerging issues, including regulatory convergence, data interoperability, information transfer and technological development.

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[1] On 29 May 2020, the Prime Minister announced that COAG will cease and a new National Federation Reform Council (NFRC) will be formed.

KPI 2: Communication with regulated entities is clear, targeted and effective

KPI Expectations

To communicate effectively with regulated entities so they understand what is required. The regulator provides clear and consistent information through various mediums including guidelines that explain why the information is required and how it is used. Effective communication supports compliance, regulatory feedback and continuous improvement.

NOPTA's Approach

NOPTA uses a variety of approaches to engage with stakeholders, including face-to-face meetings, hosting forums, attending industry conferences, publishing guidance material (such as guidelines, factsheets, and tutorial videos) and performance statistics in its annual reporting. Regular contact with titleholders helps to build a shared understanding of issues and provides opportunity to raise, clarify or address concerns as they arise.

Results: ☒ **Met**   ☐ **Partially Met**   ☐ **Not Met**

> *NOPTA assesses that it has met KPI 2. NOPTA has maintained a strong focus on clear, targeted, and effective communication with its stakeholders. This supports compliance, regulatory feedback, and continuous improvement.*

During 2019-20, NOPTA:

- Published its 2020-2023 strategic plan. The plan focusses on priorities aimed at supporting the effective regulation of Australia's offshore oil and gas resources through improved analysis of data and information, greater collaboration with industry, and better internal compliance activities to continually improve NOPTA's performance.

  – The strategic plan operationalises the department's Corporate Plan in relation to NOPTA's functions and is supported by a comprehensive internal implementation plan.

  – NOPTA reports progress in achieving its objectives in its annual report, RPF self-assessment and other media as required.

- Held 214 titleholder meetings, 264 government meetings, 40 international regulator meetings, and 58 'other' stakeholder meetings (total 576). These meetings addressed a range of matters, including clarifying the legislative framework, applications (and request for information requests), operator field performance updates, as well as matters relating to compliance and data management requests. These meetings were a mix of face-to-face, video and phone conferences and where at the request of both NOPTA and industry.

- Commenced a broad review of internal application assessment templates to better streamline and improve the transparency of advice and recommendations to the Joint Authority.

- Consistent with views received in the 2019 stakeholder survey, continued to implement improvements to NEATS to help streamline interactions with NOPTA. The first stage of this work is to rebuild the NEATS website. In May 2020, NOPTA formed an industry consultation user group to ensure needs of our key stakeholders are met (see KPI 1).

- Developed an enhanced engagement strategy for strategic communications with industry and government stakeholders.

- Replaced spreadsheets (using manual data entry) with an automated internal reporting dashboard, drawn from live data, to discuss application processing statistics, measure performance against the Joint Authority Protocol and internal timelines, and make

improvements to processes where warranted. Outcomes of these reports are published in the NOPTA Annual Report of Activities.

- Implemented a comprehensive internal lunch & learn program to improve communication between teams, better understand emerging issues, discuss lessons learnt and ensure more effective analysis, advice and decision-making processes.

- Presented at the launch of the 2019 Acreage Release, providing industry with information about the process and content for submitting bids.

- Hosted an information session for petroleum industry representatives, external legal advisors and community stakeholders on the requirements for approval and registration of petroleum title dealings.

- To maintain and promote transparent and effective engagement with our stakeholders, in 2019-19 NOPTA published:

  – The 2018-19 Annual Report of Activities which provides stakeholders with information on our activities, performance, financial results and outlook for the following year.

  – A presentation on the submission process for acreage release bids.

  – An overview of NOPTA's response to the 2019 stakeholder survey.

  – A notice informing our stakeholders of the measures that NOPTA put in place to operate effectively and provide flexibility for titleholders (particularly for well and survey data submissions) during COVID-19 restrictions.

  – A stakeholder notice outlining NOPTA's temporary COVID-19 measures with regard to accepting electronic signatures on applications. (see KPI 5)

  – The COVID-19 Work-bid Exploration Permits Fact Sheet relating to interim measures to provide flexibility for offshore oil and gas explorers during the COVID-19 pandemic. (see KPI 1)

  – An update to the Developing a Petroleum Resource Factsheet.

KPI 3: Actions undertaken by regulators are proportionate to the regulatory risk being managed

KPI Expectations

A risk-based approach is used to promote the most efficient use of resources and improve the effectiveness of the regulatory framework. This is achieved through minimising burden on those who are voluntarily compliant and ensuring that enforcement action is proportionate and undertaken only when necessary.

NOPTA's Approach

NOPTA takes a risk-based approach to titles administration, compliance and enforcement, allowing for proportionate responses to risks, suitable to the nature and complexity of the issue at hand.

Results: ☒ **Met** ☐ **Partially Met** ☐ **Not Met**

> *NOPTA assesses that it has met KPI 3. NOPTA continues to encourage early engagement with stakeholders and ensure that our actions are transparent, consistent, and proportionate to the issue at hand.*

During 2019-20, NOPTA:

- Maintained an ongoing focus on risk management, with all staff attending a dedicated training workshop to increase knowledge and better understand implications for NOPTA's administrative frameworks.

    – All staff are encouraged to actively engage with risk, including regular review of the NOPTA risk register to ensure controls are appropriately incorporated into day-to-day tasks. The process for conducting risk reviews, including how matters should be escalated if they arise, is consistent with the department's risk management framework.

- In Q4 2019, introduced an internal assurance review mechanism which examines and reports on legislative compliance with its processes and procedures. The assurance reviews are conducted with reference to the NOPTA risk register and findings are formalised through treatment action plans where appropriate. A new internal Quality Assurance Committee[2] was put in place to oversee the process and approve the annual assurance review plan. (see KPI 4)

- Responded to the responsible Commonwealth Minister's issue of an updated statement of expectations with an updated statement of intent . The updated statement clarifies NOPTA's role in relation to late life assets, decommissioning and continuing to improve data quality, integration and access under the OPGGSA.

- Updated our Compliance and Enforcement Policy to remove outdated references to the Australian National Audit Office Better Practice Guide – Administering Regulation and the National Legislative Compliance Framework (NLCF).

- Embedded the internal compliance escalation procedure into relevant standard operating documents. Teams have received training on the new procedure, as well as the use of NOPTA's internal compliance registers to ensure accurate record keeping and risk evaluation is maintained.

- Continued a steady investment in NEATS to minimise compliance risks to NOPTA and our stakeholders (see KPI 1).

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[2] The QAC is comprised of the General Manager, Operations Manager, and Strategy and Governance Manager

- Encouraged stakeholders to provide feedback on its performance via a dedicated email address (feedback@nopta.gov.au) located on its website. NOPTA did not receive any formal complaints in 2019/20.

KPI 4: Compliance and monitoring approaches are streamlined and coordinated

KPI Expectations

Information is only requested from regulated entities where it is required to achieve the regulatory objectives. Compliance and monitoring approaches are risk based and consider circumstances and operational needs of the regulated entity.

NOPTA's Approach

NOPTA promotes early engagement with stakeholders on potential non-compliance issues to maximise the range of options available and to minimise unintended outcomes for all parties. NOPTA has established internal information management systems with a specific focus on compliance monitoring to help recognise when new information is required or if the information is already held by NOPTA.

Results: ☒ **Met**   ☐ **Partially Met**   ☐ **Not Met**

> *NOPTA assesses that it has met KPI 4. NOPTA's compliance and monitoring approaches are continuously improving due to internal review processes, stakeholder feedback, and broader government initiatives. NOPTA has collaborative and consultative relationships with its stakeholders which helps support a shared understanding of how compliance underpins NOPTA's regulatory, advice and resource management functions.*

During 2019-20, NOPTA:

- Continued to strengthen our comprehensive suite of internal processes and procedures which are aligned to our specific administrative functions under the OPGGSA and associated regulations. This ensures a consistent and coordinated approach to assessments and information requests which minimises burden on stakeholders.

- In Q4 2019, introduced an internal assurance review mechanism which examines and reports on legislative compliance with its processes and procedures. (see KPI 3)

- In accordance with the Accountable Authority requirements under s16 of the PGPA and the department's Legislative Compliance Policy, conducted a comprehensive review of our compliance with the OPGGSA and associated regulations. NOPTA assessed that it had effectively managed its legislative compliance risks with no instances of non-compliance reported.

- NOPTA uses an escalated compliance and enforcement framework which is published on our website. During the reporting period, NOPTA:

    - reviewed 43 instances of possible non-compliance with the OPGGSA and regulations with one title being cancelled; another title having cancellation procedures commenced against them; advice being sent to the Joint Authority on three occasions and 38 instances requiring no further action.

- monitored 121 special conditions[3] and 76 Joint Authority expectations[4]. NOPTA identified two instances of non-compliance during the reporting period.

- Engaged regularly with NOPSEMA to support compliance monitoring and enforcement of titleholder obligations in relation to offshore oil and gas activities, including matters relating to decommissioning and abandonment. Meetings are held on a quarterly basis and additionally as required.

- Continued to collaborate with Geoscience Australia to further develop the National Offshore Petroleum Information Management System (NOPIMS) to deliver an integrated data management system; and to better manage submissions, monitor compliance, and facilitate open-file release of data.

  - The level of outstanding data submissions has remained very low throughout 2019/20.

- Continued to benchmark data submitted by titleholders for wells and survey activities. Analysis allows for the effective comparison of performance; provides a factual basis for titleholder discussions; and is helping to inform where regulatory change could remove burden and improve submissions and data quality.

- Continued to consolidate efforts to systematically analyse, compare and assess industry performance in relation to reservoir, field and facilities performance. Various benchmarking metrics have been developed for internal performance monitoring purposes, via a dedicated database, which may ultimately assist with industry efforts to improve production and cost efficiency. During the year NOPTA has begun to share insights from this work with industry to inform and encourage engagement on measures to improve project outcomes.

- Finalised the South East Australia Commerciality review. The review was provided to the relevant Joint Authority Ministers and considered the commercial viability of developing discovered and undiscovered natural gas resources within retention leases and production licences in the Victorian and Tasmanian offshore waters administered by the Commonwealth.

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[3] A special condition is a unique condition on a title, further to the work program. It could be a condition attached to the grant or renewal of a title, the acceptance of a field development plan, or other approval. If a condition is not complied with, this may lead to compliance action in relation to the title.

[4] An expectation can be placed on the approval of an application relating to a title. It could be an expectation to provide six monthly status updates to NOPTA on the progress of completing the primary term work commitment program activities. If an expectation is not complied with, the Joint Authority may consider this in future decision making.

KPI 5: Regulators are open and transparent in their dealings with regulated entities

KPI Expectations

Where possible, regulators clearly communicate the evidence base and approach used in decision-making processes. Transparency provides the regulated entity and broader community with greater confidence and understanding of the regulator's role.

NOPTA's Approach

NOPTA exercises its functions and powers under the OPGGSA, associated regulations and other applicable laws in good faith and to the best of its ability. It is responsive, consultative, accountable and transparent. NOPTA makes decisions and recommendations based on the merits of the information with which it is presented.

Results: ☒ **Met** ☐ **Partially Met** ☐ **Not Met**

> *NOPTA assesses that it has met KPI 5. This has been achieved through regular communication and consultation with our stakeholders, and the publication of information relevant to our performance and strategic objectives.*

- NOPTA has developed and published a comprehensive suite of guidelines[5] and factsheets to provide clarity with respect to specific legislative and regulatory processes. External guidance material is reviewed and updated (as required) on a periodic basis. Where relevant, stakeholders are consulted in the review process.

- NOPTA engages titleholders at all stages of the assessment cycle to provide guidance and to discuss process and compliance related matters (see KPI 4). With the global challenges of COVID-19, NOPTA replaced face to face meetings with video conferencing, and put in place temporary alternative arrangements for data submission and use of electronic signature platforms (see KPI 2).

- NOPTA publishes data relevant to its performance in its Annual Report of Activities. The NEATS public website is also currently being rebuilt which will result in improved functionality and reporting in relation to applications tracking for all titleholders (see KPI 1).

- As approved by the COAG Upstream Petroleum Resources Working Group[6], NOPTA has published the Joint Authority Protocol which clarifies the roles and functions of the Joint Authority, NOPTA, NOPSEMA and other stakeholders in relation to the provision and clarification of information, and communication of decisions.

- NOPTA's Compliance and Enforcement Policy is published on the website and was last reviewed in October 2019.

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[5] Guidelines are the policy documents of the Joint Authority, owned and updated by ORB
[6] On 29 May 2020, the Prime Minister announced that COAG will cease and a new National Federation Reform Council (NFRC) will be formed.

KPI 6: Regulators actively contribute to the continuous improvement of regulatory frameworks

KPI Expectations

Regulators will actively contribute to the continuous improvement of the regulatory framework, including establishing cooperative and collaborative relationships with stakeholders and regularly seeking and sharing feedback.

NOPTA's Approach

NOPTA works collaboratively with ORB as the policy area of the department to provide constructive input into regulatory change processes and works closely with industry and other stakeholders to provide guidance and implement changes as they arise.

Results: ☒ **Met**   ☐ **Partially Met**   ☐ **Not Met**

> *NOPTA assesses that it has met KPI 6. This is evident through a range of initiatives undertaken and currently underway to improve our administrative performance and help address matters of strategic relevance to industry.*

During 2019-20, NOPTA:

- Participated in several cross-agency forums (domestic and international) and annual events to discuss current and emerging issues, share ideas and implement improvement strategies (see KPI 1).

  - Regular consultation with our international counterparts has significantly contributed to our understanding of contemporary and emerging issues, including regulatory convergence, data interoperability, information transfer and technological development.

- Contributed to the development of amendments to the OPGGSA to streamline the regulation of greenhouse gas storage formations where the formations overlap a boundary between Commonwealth and State/NT jurisdictions.

- Worked closely with ORB in the development and publication of interim guidance material relating to COVID-19 measures, as well as the update of the *Developing a Petroleum Resource Factsheet* (see KP2).

- Continued to work with ORB and NOPSEMA on the development of a framework for decommissioning and late life title matters under the relevant legislative and regulatory frameworks (KPI 1 and 3).

- Provided input (where requested) into the independent review into the circumstances leading to the administration and liquidation of Northern Oil and Gas Australia (NOGA).

- NOPTA has a dedicated feedback email (feedback@nopta.gov.au) located on its website (see KPI 3).

- The Joint Authority Protocol is published on the NOPTA website which provides clarity around communication standards between key government agencies (see KPI 5).

External Validation Comments

Bellbrook Consulting was engaged by NOPTA to perform independent validation of NOPTA's 2019-20 self-assessment against the six KPIs of the RPF. Bellbrook Consulting has concluded that NOPTA's self-assessment report provided a comprehensive and balanced assessment against the six KPIs. The following comments were provided:

Bellbrook Consulting comments: NOPTA 2019-20 self-assessment

The independent validation was conducted in line with Attachment B to the 'RPF Regulation Reform Team's Detailed Analysis of Regulator Performance to Support Advice and Recommendations at Attachment A'. This provides for assessment against two checklists, one for assessment of each of the six KPIs and a second for the overall assessment of the self-assessment. This analysis was supplemented with interviews with representatives of regulated entities and of the Australian Petroleum Production and Exploration Association. The interviews provided feedback against each the six KPIs and more general discussion of NOPTA's performance. The results of the validation are set out in the following section.

NOPTA's self-assessment is comprehensive, it addresses the six KPIs in detail and provides a detailed assessment against each of its claims against them. Some of the main foundations for NOPTA's assessment are included below.

Identified RPF activities	KPI 1	KPI 2	KPI 3	KPI 4	KPI 5	KPI 6
Implementation of findings of the 2018-2019 Survey	☑	☑	☑	☑	☑	☑
Improvements to NEATS	☑		☑	☑		
Development of Factsheets and other publications	☑	☑			☑	
Process redesign for COVID-19	☑			☑	☑	
Cross-agency forums	☑					☑
International consultation	☑					☑
2020-23 Strategic Plan		☑				
Stakeholder meetings		☑				
Review of application assessment templates		☑				
Enhanced engagement strategy		☑				
Automated, live data dashboards		☑				
Team meetings to improve consistency and understanding of emerging issues		☑				
Launch of 2019 Acreage release		☑				
Risk management training			☑			
Introduction of internal assurance			☑	☑		
Updated Statement of Intent			☑			
Updated Compliance and Enforcement Policy			☑		☑	
Embedded internal compliance escalation			☑			
Process improvement				☑		

Identified RPF activities	KPI 1	KPI 2	KPI 3	KPI 4	KPI 5	KPI 6
Legislative compliance review 2020				☑		
Compliance and enforcement action				☑		
Engagement with NOPSEMA/Geoscience Australia	☑	☑		☑		
Data benchmarking of industry performance				☑		
South East Australia Commerciality Review				☑		
Development of Joint Authority Protocol					☑	
Framework for decommissioning and late life title matters						☑
Contributions to the NOGA review						☑
Establishment of feedback facility on the NOPTA website	☑				☑	☑
Contributions to amendments of the OPGGSA						☑

Conclusion

NOPTA's performance as a regulator meets the six KPIs set out in the RPF and its self-assessment provides strong claims against each of the KPIs with relevant and compelling evidence to support those claims. It has adopted a flexible and pragmatic approach that is well suited to the regulatory environment.

Several contributors commented on the importance of NOPTA's relationship with NOPSEMA. The views expressed were that NOPTA communicates effectively with NOPSEMA to address emerging issues such as asset decommissioning late field life financial transactions with a view to streamlining processes. NOPTA is seen by regulated entities as becoming technically stronger and more open and transparent in its dealings with industry. These views of industry operators confirm that NOPTA's performance as a regulator continues to improve.

NOPTA's positive RPF self-assessment reflects, in part, its ongoing focus on the quality of its performance through the use of surveys of regulated entities and the introduction of a formal mechanism for regulated entities to provide feedback on NOPTA's performance. Similarly, the quarterly dashboard report provides NOPTA with live data on aggregate key performance statistics relating to application processing timeframes, data management and financials. These are valuable tools for the monitoring of performance and to drive continuous improvement in NOPTA regulation.

The 2019 survey responses have been the basis for improvements within NOPTA in 2019-2020 and the interviews with stakeholders confirmed high levels of satisfaction across the areas covered by the six KPIs. In particular, NOPTA was regarded as being 'in tune' with regulated entities and took steps to ensure its regulatory approach was proportional, transparent and collaborative.