

# **LEGISLATIVE COUNCIL ENVIRONMENT AND PLANNING COMMITTEE**

## **Inquiry into Decommissioning Oil and Gas Infrastructure**

Melbourne – Wednesday 10 December 2025

### **MEMBERS**

Ryan Batchelor – Chair

David Ettershank – Deputy Chair

Melina Bath

Gaelle Broad

Jacinta Ermacora

Wendy Lovell

Sarah Mansfield

Rikkie-Lee Tyrrell

Sheena Watt

### **PARTICIPATING MEMBERS**

John Berger

Ann-Marie Hermans

Tom McIntosh

Evan Mulholland

Rachel Payne

Aiv Puglielli

Richard Welch

**WITNESSES** (*via videoconference*)

Peter Kos, Director, Victoria and New South Wales, and

Jason Medd, Director, Offshore and Decommissioning, Australian Energy Producers.

**The CHAIR:** Welcome back to the Legislative Council Environment and Planning Committee's inquiry into oil and gas decommissioning in Victoria. Welcome to witnesses from the Australian Energy Producers.

Just a brief statement from us: all the evidence that we take is protected by parliamentary privilege as provided by the *Constitution Act 1975* and the provisions of the Legislative Council standing orders. Therefore the information witnesses provide today during the hearing is protected by law. You are protected against any action for what you say during the hearing, but if you go elsewhere and repeat the same things, those comments may not be protected by this privilege. Any deliberately false evidence or misleading of the committee may be considered a contempt of the Parliament.

All the evidence is being recorded, and you will be provided with a proof version of the transcript following the hearings. The transcripts will ultimately be made public and posted on the committee's website.

Welcome. My name is Ryan Batchelor. I am the Chair of the committee and a Member for the Southern Metropolitan Region. I will just ask committee members to introduce themselves, and then we will get you to do the same and get underway. Gaelle.

**Gaelle BROAD:** Hello. I am Gaelle Broad, Member for Northern Victoria Region.

**Melina BATH:** Good morning. Melina Bath, Eastern Victoria Region.

**Wendy LOVELL:** Welcome. I am Wendy Lovell, Member for Northern Victoria Region.

**Tom McINTOSH:** Tom McIntosh, Eastern Victoria Region.

**Sarah MANSFIELD:** Sarah Mansfield, Member for Western Victoria Region.

**The CHAIR:** If I could ask each of you to state your full name and the organisation you are appearing on behalf of for the Hansard record, please.

**Jason MEDD:** Thank you. I will start. My name is Jason Baxter Medd. I am the Director for Offshore and Decommissioning from Australian Energy Producers.

**Peter KOS:** My name is Peter Kos, and I am the Director of Victoria and New South Wales for the Australian Energy Producers.

**The CHAIR:** Thank you very much. Gentlemen, I will ask now if you would like to make a short opening statement, and then we will move on to questions. So over to you.

**Jason MEDD:** Thank you, Chair. I would like to make just a short introductory statement, if I may, and I welcome the opportunity to do so. We appear before you today on behalf of Australian Energy Producers. We are the national body for the Australian upstream oil and gas industry. Our members have supplied gas for Australia's and Victoria's gas needs from Bass Strait and the Otway Basin for more than 55 years. The infrastructure will need to be decommissioned in the coming years, and our industry is fully committed to delivering safe, responsible, environmentally sustainable outcomes as we do this.

In our submission almost every piece of offshore oil and gas infrastructure relevant to Victoria – the platforms, wells, pipelines – sits beyond the 3-nautical-mile limit, which we explained, putting it in Commonwealth waters. That means under both Australian and international law, decommissioning of that infrastructure must remain a Commonwealth responsibility regulated by the independent expert regulator NOPSEMA under the *Offshore Petroleum and Greenhouse Gas Storage Act*. It is not a regulatory gap. This is a mature, risk-based, nationally consistent framework that already imposes strong enforceable obligations on title holders, including permanent plugging and abandonment of wells to world-class standards; removal of infrastructure with an option to leave in place where that delivers equal or better environmental outcomes, assessed under an

evidence-based framework; a trailing liability that will follow a title holder in perpetuity; and a rigorous environmental management and monitoring framework, including future emissions monitoring as well. Industry is already delivering under this framework in Bass Strait and Otway Basin. We have permanently plugged and abandoned hundreds of wells, removed and recycled large volumes of infrastructure and committed billions of dollars to decommissioning, all under NOPSEMA's oversight. Duplicative or inconsistent state regulation of offshore Commonwealth activities would not improve safety or environmental outcomes; it would create uncertainty, delays to decommissioning and increased costs and undermine investor and community confidence with no environmental benefits.

The Victorian government does, however, have a vital and constructive role. Where infrastructure interfaces with state jurisdiction, ports, onshore reception and recycling facilities, or the very small amount of infrastructure in state waters to the 3 nautical miles, the Victorian government can provide clear, efficient and streamlined approvals that align with, rather than duplicate, Commonwealth processes. More importantly, Victoria has a once-in-a-generation opportunity to turn decommissioning into a multidecade economic positive for Gippsland and the state's south-west – regional jobs, skill transfers, growth of the Victorian decommissioning supply chain and genuine economic participation for traditional owners and local communities. Federal law already requires comprehensive consultation with traditional owners. Victoria can add real value by facilitating partnerships, capacity building and employment pathways, not by creating parallel consultation regimes.

Finally, on greenhouse gases, well integrity standards and plugging requirements directly prevent fugitive methane. NOPSEMA already enforces monitoring and remediation under the current regime. The Commonwealth framework we think is an appropriate mechanism to protect both the environment and the community.

In summary, Chair, we respectfully ask the committee to affirm that offshore decommissioning in Commonwealth waters is a Commonwealth responsibility; to reinforce confidence in the proven regulatory framework, which has already delivered results; and to focus on Victoria's efforts on efficient state processes that support local jobs, skills and traditional owner opportunities. We look forward to collaborating with the committee, the Victorian government and the Commonwealth to get decommissioning right for the environment, for the workers and for Victorian communities. Thank you for the opportunity, and I am happy to take any questions you might have.

**The CHAIR:** Thank you very much. I might start just with this regulatory issue, because that is the big one that you have raised in your submission and in your opening statement. Obviously we have got the 3-nautical-mile limit. We have got the Commonwealth regulation NOPSEMA in Commonwealth waters. But as you mentioned, there are assets in Victorian waters, and also some of those assets extend onshore. What is your submission on how Victoria should approach our regulatory task of ensuring proper decommissioning of the assets in the Victorian jurisdiction? Should we just be aligning with whatever decision-making is undertaken at the Commonwealth, or is there a role for particular Victorian views about what happens in the Victorian jurisdiction?

**Jason MEDD:** Thank you for the question. It is a great question. From industry's perspective, I suppose, inefficiencies and misalignments come into play where there is an interface between those jurisdictional boundaries. For instance, those interfaces include mostly pipelines that cross into state offshore waters and into the state onshore. It is probably also worth mentioning that the Victorian government has delegated oversight in state Victorian waters to NOPSEMA for safety and well operations, so you might consider that as well. Thank you, Chair. I think from our perspective on the general philosophy with regard to regulation and oversight that we see in offshore, the risk-based approach around compliance and regulation is robust and has been in place and proven for a long time, so that general approach is good. With regard to the possibility of leaving material behind, the general approach from offshore regulators is an equal or better environmental outcome, really to avoid circumstances where, if you apply astringent, everything must be removed. In some bespoke circumstances you may actually pose a greater risk to the environment but also to workplace safety by those standards. But I think in the Victorian state jurisdiction, I am not completely across the prevailing legislation and regulations that apply in the onshore, but I can reflect that back from what we see in the offshore.

**The CHAIR:** Just on the risk question, what do you think the biggest risks are to the decommissioning process?

**Jason MEDD:** I think when you look at that – and our members are completely aware of this – you need to have a very clear idea of what you are what you are dealing with, because you basically have infrastructure that has been in place for an extended period of time. So you need to measure, survey and have a very good understanding of what in fact you are dealing with from a safety perspective. With regard to environmental risk, there are a lot of things at play which are not unique to decommissioning itself per se. A large part of the decommissioning work is well intervention and well plugging and abandonment, which is another element of well operations. Then you have basically got some of, I suppose, the more visual types of decommissioning activities with regard to the removing of topside infrastructures and the recycling of those structures as well. I suppose the ultimate end state of a lot of that material, whether it is recycled or responsibly disposed of, comes under the purview of government regulation and is closely regulated.

**The CHAIR:** Where do you think this process has been done well? When you look at this decommissioning process – we are looking at other places – where do you think this has been done well in the world?

**Jason MEDD:** As an organisation we look at the North Sea with regard to them having very extensive offshore facilities that have been progressively decommissioning over decades. In fact what we tend to do as an organisation – there have been a lot of learnings on that path, particularly in the North Sea and in the UK. We use the UK as an analogue and a guide for what could happen in Australia inasmuch as the fact is the UK legislative regulatory framework and legal system are very similar to Australia. I think the decommissioning that has occurred and is occurring in offshore Victoria is also world's best practice, without a doubt; it is of a world-class scale, and it is currently underway.

**The CHAIR:** Thank you. Ms Bath.

**Melina BATH:** Thank you. I am very interested – in many ways you are suggesting that as an upper house Environment and Planning Committee we should stick in our lane in terms of us making recommendations to state government, and state government has a responsibility to respond to our recommendations. We can ask the federal government to do things, but they have no responsibility to respond to us. Am I reading what you are saying?

**Jason MEDD:** No, I do not think that was the intent of my statement. My point was that we have an existent – at least in the Commonwealth offshore areas – comprehensive legislative and regulatory regime in place. We really would welcome the review of the committee and any recommendations as well. I think nothing created by humans is ultimately perfect at the end of the day, but I just wanted to make that point, that offshore in the Commonwealth is stringently regulated by NOPSEMA and other Commonwealth government agencies around this. There is a role for the state government through the joint authority, particularly with regard to how offshore petroleum titles are managed and particularly under circumstances where they are surrendered.

**Melina BATH:** Thank you. Great. In relation to Barry Beach – and this committee will be heading to Port Anthony and Barry Beach – it is a mature site. It has been Esso and BHP, and ExxonMobil have been acting in that as a logistics hub for a long time. From your position, Australian Energy Producers' position, what are the opportunities there? What needs to happen? What can state government do to help facilitate that, to expand not only the decommissioning, which is in effect happening now, but also the potential opportunity for recycling of the material onsite?

**Jason MEDD:** Thank you. That is a good question too. I will try to answer it as best I can; I think the operator of that facility is probably better positioned to provide a bit more detail. But we can point in the direction of a lot of the work that the Commonwealth has done in this space with regard to decommissioning and recycling, particularly in relation to the national road map on decommissioning, which does touch upon a lot of the issues around how government can facilitate with regard to training, enhancing local infrastructure and enabling capability through local service providers and local companies to service all of these requirements. There is a lot of work that has been ongoing with the Centre of Decommissioning Australia, CODA. I understand that they will be talking to this committee later this morning, and they may talk about what they are doing in this space in a lot more depth. But we do definitely support any efforts by governments, whether it be state or Commonwealth, to enhance infrastructure and enhance job and economic opportunities as a result of decommissioning, without a doubt.

**Melina BATH:** Thank you. I am also interested, on the same theme, in job creation in areas – Gippsland is one of them, Otways is another – where there has been a traditional market of high employment and healthy employment down there through these industries. As there is a transition and the decommissioning, what is your position on how government and industry can support workforce development through that decommissioning? What do we need in terms of workforce, and what could be done on the front foot to support that workforce development – housing et cetera? What is your position on that?

**Jason MEDD:** Thank you. I think close communication and liaison with the overarching operators is important, because they will actually know exactly what their needs will be and when, and particularly with regard to local opportunities and local workforce and training. I think government would need to be responsive and, like I said, open to communication with those operators and connect the dots, so to speak. Basically, if there is bespoke or general training which is otherwise needed, there could be opportunities there to provide that in those regions. Like I said, it is also facilitating with regard to connecting businesses to those opportunities in those areas where decommissioning activity will occur, and also aligning existing businesses around recycling – the recycling industry is fairly large and is in place – ensuring that those opportunities are known across that industry as well and business relationships can be formed.

**Melina BATH:** Thank you. I think my time is up.

**The CHAIR:** It is. Dr Mansfield.

**Sarah MANSFIELD:** Thank you. And thank you for appearing today. Earlier this year you would be aware that Woodside took weeks to report accidental spillage of around 200 kilos of plastic into the ocean, which occurred in the context of decommissioning efforts there. It took weeks to report that spillage to the regulator, and it only occurred after volunteer beach cleaners discovered it on Logans Beach. In your submission you make the recommendation that this committee should make a recommendation to reinforce confidence in existing controls. Why should Victorians have any confidence in controls that not only failed to prevent a spill like this but left it to the volunteer beach cleaners to discover and to trigger the report to the regulator?

**Jason MEDD:** Thanks. Good question. I make the observation – and I am not completely across that circumstance and issue – that the prevailing regulatory framework, offshore at least, is that there is a statutory obligation for operators to report to the regulator in set times issues of significant losses around loss of containment or other materials or pollution to the surrounding marine environment. I do not know the specific circumstances which purportedly delayed or prevented the reporting of that loss or whether it was known to the operator at the time. I do not know.

**Sarah MANSFIELD:** Thank you. It was a while ago, but in 1989 *Australian Energy Producers Journal* published a report by one of your member organisations, Exxon, or Esso Australia, and they acknowledged in that report that there was a legal obligation to remove platforms once production ceased but promoted leaving it in there as a cheaper alternative. It said:

Full platform removal to shore is an environmentally sound option but cannot be justified in economic terms.

Do you know if any of your members, including Exxon Mobil, Esso or any other members since that time, have pursued or supported any of those approaches in practice?

**Jason MEDD:** Look, I doubt very much that that position would be supported. In fact the legislative framework has changed significantly since 1989, which would prevent at all any type of end state that would leave unused or unutilised surface structures above the sea surface in place as part of a decommissioning solution regime.

**Sarah MANSFIELD:** Okay. Thank you for that. Would you agree that efforts to minimise the amount of infrastructure that is removed may be motivated by concerns about costs of that removal by companies – perhaps whatever can be achieved within the existing regulatory framework?

**Jason MEDD:** Well, in so much as the fact that there are many factors that dictate the decommissioning plan and outcomes and end state, cost is one amongst many. There is, I suppose, the long-term risk and liability that also applies. There are also the environmental outcomes and risks that come into play, the technical feasibility with regard to removing and leaving in place as well, as well as the safety with regard to the workers who are employed to remove those facilities. Cost is one factor, but it is not the only one, and ultimately the

government regulators – we have NOPSEMA and also DCCEEW, the department which oversees sea dumping – certainly have a say and can prescribe outcomes.

**Sarah MANSFIELD:** Okay. Just on this issue I guess of cost reduction, in early 2024 Esso reported a hydrocarbon spill in the Bass Strait, believed to be from a pipeline that connected to their platforms out there. Then there was a second rupture from another rig, which caused toxic gas condensate to spew into the ocean. This was all occurring while Esso was planning to repurpose that infrastructure for carbon dumping operations. Would you say that that plan was driven by a desire to reduce their costs or that the plan to so-called repurpose that infrastructure was driven by a desire to reduce costs?

**Jason MEDD:** Look, I cannot speculate with regard to the motivations of our members, but looking at it practically, if there are existing or pre-existing projects or opportunities for carbon capture and underground storage, it would make sense to at least assess the potential utilisation of existing infrastructure that could facilitate that. Not only could, I suppose, subsea pipelines facilitate that infrastructure, there are possibilities for other infrastructure that could facilitate other offshore energy activities as well.

**The CHAIR:** All right. Thank you, Dr Mansfield. Mr McIntosh.

**Tom McINTOSH:** Thanks for being here. Just following on from that, I know it can probably be very high level, but as a percentage of projects or infrastructure that need decommissioning, do you get a feel for what percentage of the industry that are considering the safety risk or the cost or whatever the scenario might be are advocating to leave infrastructure in place?

**Jason MEDD:** I think the principle issue here with regard to leaving in place is that Commonwealth legislation has a presumption under the law that the base case is everything must be removed. So that is your starting point with regard to your decommissioning planning. From that point you will be assessing with regard to looking at the removal of infrastructure. Certainly there are basic rules around not leaving anything above the sea surface, but below the sea surface and on the seabed a number of factors come into play. To give you a practical example, if you have basically buried pipelines or other below-the-seabed infrastructure, it would be impractical or in some cases impossible to remove some of that infrastructure – consider things like foundations, the jackets for the frames that the facilities sit on, to deep bury pipelines.

**Tom McINTOSH:** That is a good point. So of infrastructure exposed and above the seabed you are saying there is a presumption everything is removed, but do you get a sense for what percentage of infrastructure industry might be advocating not to remove?

**Jason MEDD:** I think it would be quite low. I mean, you have also got to consider that there is an unending trailing liability with regard to any property or material that is left in place. If that property or material causes problems further down the line, the previous owners or titleholders can be called back to remediate and remove it, and at a later date it will be much more difficult and expensive to do that activity. So there is a very strong incentive for operators to remove as much material as they possibly can, because they actually are held to that ultimate responsibility in perpetuity.

**Tom McINTOSH:** Thank you. Of that material, have industry looked at the economic value of steel and recycling materials, and if so – let us just say we are talking above the seabed at this point – by that material not being removed, what is the economic value that is being forfeited in that process? There are two sides to that.

**Jason MEDD:** Okay. I will try and try and answer as best I can. Of course there is some value with regard to the removal and recycling of those materials. I understand Exxon will be looking to remove and recycle the vast majority of their ferrous and non-ferrous metals and materials from those facilities to feed them back for other uses as well. I think that is given. I think with regard to the economic opportunity, I do not know. I am not across the commercial aspects of the costs and other kinds of sales values for those materials.

**Tom McINTOSH:** Yes. I just want to follow on from Ms Bath's questions earlier around workforce, the pipeline of workforce. Are industry doing work to understand the size of the workforce required and also the skills and training required? We talked about what government are doing, but I am just interested in what industry are doing as far as identifying and whatnot.

**Jason MEDD:** Yes. Again, I would probably just point towards the Centre of Decommissioning Australia. They are doing a lot of work with regard to that interface into businesses and workforces. I think in the Victorian context Esso have communicated the long and ongoing requirement for workers as part of this activity. Relating to some of the positions and roles of those workers, they could be very specialist all the way through to semiskilled and unskilled workers that you need. The other thing to consider as well is that in Victoria I think, at least in Gippsland, you have got a very long stretch of ongoing work around for decommissioning. But around Australia it can be episodal as well, which can make the sustainability of a continuous, ongoing industry a little bit difficult.

**Tom McINTOSH:** Thank you.

**The CHAIR:** Thanks, Mr McIntosh. Ms Lovell.

**Wendy LOVELL:** Thank you very much. You quite correctly pointed out in both your submission and your presentation today that the vast majority of this infrastructure is in Commonwealth waters and does fall under the responsibility of the Commonwealth for decommissioning. But there is some ancillary infrastructure like pipelines and onshore facilities that do fall within the state as well. And ultimately, any failure of the Commonwealth decommissioning too is a threat to Victoria's coastline and fisheries, so Victoria, although it has the lesser responsibility, carries the greater risk. I was just wondering if you can give us any examples of other jurisdictions where the jurisdiction with the lesser responsibility actually carries the greater risk – good examples of how there has been collaboration between the two jurisdictions or any that have particularly gone badly?

**Jason MEDD:** I think in the Australian context, I suppose the prevailing jurisdiction would be Western Australia, particularly offshore in the north-west, where there have been a number of projects that have been decommissioned or are under decommissioning as well. As I raised previously, there is a Joint Authority. With regard to those adjacent offshore areas, in Commonwealth areas, there is a Joint Authority arrangement administered by the National Offshore Petroleum Titles Administrator that ensures collaboration and communication between the state and Commonwealth jurisdictions on some of these issues. But they tend to be centred around title-related issues. But I suppose more generally there are also opportunities, and I do know that there is ongoing liaison and other kinds of interaction arrangements between the state and the Commonwealth regulators as well, looking to coordinate activities as well, particularly as they relate to decommissioning or operations that join or cross boundaries between the jurisdictions.

**Wendy LOVELL:** Thank you. Also, we have heard a lot about the infrastructure and the removal of the actual infrastructure that is offshore. Everyone seems to agree that all surface infrastructure will be removed, but there seems to be some debate around these subsurface structures. I just wonder if you have a view on the subsurface structures and the removal of those or leaving them in place.

**Jason MEDD:** Certainly. As I said previously, the end state will need to be approved. It is not really dictated by government. It will need to ultimately be approved by not only NOPSEMA but the Commonwealth department of the environment, DCCEEW, under their role for administering international protocols under the London Protocol for sea dumping. So not only do we come under the offshore Act, the OPGGSA, with regard to the administration and removal of property, but we also come under the Commonwealth environment Act 1981, commonly known as the sea dumping Act, and the requirements there too, which is a parallel process with regard to decommissioning and particularly as it relates to any materials that would be left in place.

I think, as I alluded to previously, the trailing liabilities are a fairly strong incentive to remove as much material as you practically can from the seabed. There is also a legal requirement to rehabilitate the seabed to its initial and original condition as well. So you need to kind of balance those out. In so far as the fact that you also need to balance it out with regard to the possibility of removing some of these things, you will always leave property and materials as part of a well decommissioning. Also, with regard to deep piles for jackets for the supporting structures, for topside infrastructure, it is impractical and I suppose almost impossible to remove that material as well. In other areas in Australia with regard to large seabed pipelines, whether they be buried or basically buried under ballast, which is kind of a big layer of rocks, the practicality of removing those pieces of property would be in doubt as well, inasmuch as the fact that it poses a safety operational issue, but also significant environmental disturbances in the fact of having to dig up the seabed and remove the ballast to remove those items. So I think, practically, you have to look at this and balance it out with regard to: is it safe and practical to

remove these items? Are they sound and safe? Do they pose a long and ongoing environmental risk to human health and also to the surrounding environment too? There are all these things that come into play and need to be considered.

**The CHAIR:** Thank you. Mrs Broad?

**Gaelle BROAD:** Thank you both for your contribution to this inquiry. I am just interested – we heard from Professor Tina Soliman-Hunter from Macquarie University, and one of the recommendations put forward was to amend the Offshore Petroleum and Greenhouse Gas Resource Management Regulations to adopt a best practice standard for plugging and abandonment of wells. I am just interested in your thoughts on that. Is there a best practice standard? I am also interested just in the national decommissioning road map that I saw, what is the role of that? But if you could just talk first to: is there a best practice standard for this decommissioning?

**Jason MEDD:** Yes, sure. Under the well operations management plans, which are administered by NOPSEMA – and they could probably talk about this point in a bit more detail – companies are currently required to essentially refer to international best practices and standards. Essentially a lot of those best practices and standards in the offshore derive from the UK or from Norway. I know Dr Tina and I have great respect for her. I think with regard to establishing set standards or detailed engineering and operational standards by an operator, my opinion is that you need to ensure that they are always up to date and they are world's best practice. In so much as the fact that when the regulator refers to and basically when operators refer to international best practices and standards they are usually up to date, I think almost always up to date, and they will be looking to meet or in some cases to exceed some of those best practices and standards. With regard to the well design for plugs and other things, decommissioning plugs that are put into wells and other things like minimum plug depths, the locations and things like that, they are prescribed, and they are usually prescribed in those existing standards.

**Gaelle BROAD:** Okay. I saw the national decommissioning road map. That does refer, like you say, to best practice in Norway and the UK. Because that is Commonwealth, does Victoria also point in that direction for what is administered by the state?

**Jason MEDD:** Just in Victoria's circumstance, I understand that the Victorian government has delegated the oversight of well operations and completions to NOPSEMA. So I think by default in Victorian state offshore waters they would come under that same regime.

**Gaelle BROAD:** Okay. So I guess you feel that for Victoria that would be reinventing the wheel if we were to do best practice or continue to point to international best practice?

**Jason MEDD:** I think if we continue to point to international best practices, what you need to realise there is that those practices and standards are derived from hundreds if not thousands of examples and a vast array of experience and ongoing operational experience around those well operations where we do not have that depth of experience, I suppose. Although we are fairly busy and we are fairly active in Australia, comparatively we are quite small, and it is useful to refer to those other jurisdictions which have a much larger history and ongoing operational exposure to that activity and to use those standards. And with regard to the regulators and the governments in Norway and the UK, to be frank, they are not slackers when it comes to environmental protection and safety protection in the offshore. In fact they are they are world-leading in that regard.

**Gaelle BROAD:** Okay. My understanding – and you mentioned it earlier in the case of the Commonwealth – is if there is a leak or something like that, even after a title is returned, the Commonwealth has the power to recall the provider. The professor pointed out that at the state level there does not seem to be that jurisdiction. Do you have any comment on that – the ability to recall after that title has been returned?

**Jason MEDD:** My understanding is that there is in fact a capacity for the state, under the state of Victoria's government's legislative framework, to basically direct an existing or a previous titleholder to do a thing, even if that title area, the tenement, has been extinguished. This is a mechanism which is common across the state jurisdictions through a generally perceived harmonised regulatory framework for petroleum. You see some of that harmonisation as well that goes into the Commonwealth offshore areas. So my understanding is, just through some simple research, that there is a capacity currently for the Victorian government to call back existing or previous holders to do things, and that could be related to remediation works as well. Whether that has been tested or exercised, I do not know.

**Gaelle BROAD:** Thank you.

**The CHAIR:** Thank you, Ms Broad. Well, Jason, Peter, thank you so much for taking the time today to provide evidence to the committee. We really appreciate the insights you have given to us. You will be provided with a proof version of the transcript for you to review in the next week or so.

And with that, the committee will take a short break. Thank you.

**Jason MEDD:** Thank you.

**Witnesses withdrew.**