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Attn: Committee Secretary
Parliamentary Joint Committee on Intelligence and Security
PO Box 6021
Parliament House
Canberra ACT 2601

Dear Committee Secretary

SUBMISSION INTO THE REVIEW OF THE TRANSPORT SECURITY AMENDMENT (SECURITY OF AUSTRALIA'S TRANSPORT SECTOR) BILL 2024

Woodside welcomes the Government's commitment to improving the aviation and maritime transport sectors' safety, security and resilience. Woodside relies heavily on the aviation sector to move our people safely and the maritime transport sector in the operation of our offshore facilities and the transport of our product to market. Over 300 ships visited Woodside assets last year and over 40,000 Woodside travelers flew between domestic airports. Over 20,000 passengers were transported to and from our offshore assets on over 4000 helicopter flights and our contracted vessels made over 550 return voyages to our assets from King Bay Supply Base.

Woodside's experience of activists breaching petroleum safety zones at Woodside-operated facilities - and in one case illegally boarding a non-operational offshore asset - highlights the need for strong safeguards against unlawful interference with critical infrastructure including aviation and maritime transport, and offshore facilities. The current Maritime Transport and Offshore Facilities Security Regulations provide for only minor penalties for breaches of security zones for offshore oil and gas facilities. This review provides the Parliamentary Joint Committee on Intelligence and Security opportunity to consider strengthening these penalties to support enforcement of security zones and deter unauthorised incursion onto offshore facilities.

Over the past 18 months, Woodside's security team has provided feedback on the proposed amendments to the Australian Transport Security Act (ATSA) and Maritime Transport and Offshore Facilities Security Act (MTOFSA) through several consultations with the Cyber and Infrastructure Security Centre (CISC).

Woodside welcomes the Bill's proposal to remove the requirement for ships that operate both as a ship and an offshore facility to have two security plans. MTOFSA will only require these vessels to have an approved ship security plan, removing unnecessary duplication and establishing greater coherence across the overlapping regulatory requirements.

Other aspects of the proposed MTOFSA amendments to introduce All Hazards into the Maritime Security Risk Assessment and Maritime Security Management Plan will, however, create duplication and compliance overlap. Woodside currently addresses All Hazards as part of the regulatory compliance regime managed by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) and the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS). This duplication and compliance overlap will not only create inefficiencies and additional compliance effort but may lead to CISC reviewing compliance of areas that have been reviewed and approved by NOPSEMA and DEMIRS.

There is also an All Hazards regime under the Security of Critical Infrastructure Act (SoCI) that covers most of Woodside's operations. This legislation was drafted to work alongside MTOFSA and the legislative frameworks of NOPSEMA and DEMIRS. Woodside's ports and Floating Production Storage and Offloading facilities (FPSOs) are currently not covered under SoCI. An extension of SoCI to cover oil facilities and ports would close this gap, removing the need to include an All Hazards regime under the proposed MTOFSA amendments.

The recent implementation of the SoCI regime introduced additional regulation and cost to industry but with a clear set of objectives in doing so. An extension of this regime is a simple and effective approach to ensure all industry participants consider All Hazards in their operations without impacting other regulatory regimes.

Woodside operates in a highly regulated environment and advocates that the regulators with overlapping security requirements for the offshore industry (e.g. MTOFSA, DEMIRS and NOPSEMA) work closely together to remove duplication of reporting.

In summary, while largely endorsing the proposed amendments, there remains opportunity to further reduce duplication in the application of, and compliance with the legislation.

Yours sincerely



Tony Cudmore

Executive Vice President Sustainability, Policy and External Affairs