

# Making submissions to NOPSEMA

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## 1 Purpose

This guideline provides information for operators, titleholders and other parties intending to formally submit a document to NOPSEMA for assessment. The purpose of the information is to enable a timely response to submissions and to minimise the need for re-submission due to administrative deficiencies.

## 2 Scope

This guideline specifically applies to document submissions including design notifications, operator nominations, proposed scopes of validation (SoV), safety cases, environment plans (EPs), offshore project proposals (OPPs), diving safety management systems (DSMS), well operations management plans (WOMPs), well activity notifications and end of well abandonment reports.

Legislation referenced in this document is available from the Federal Register of Legislation website:

[www.legislation.gov.au](http://www.legislation.gov.au)

## 3 Guidance

### 3.1 Cover sheet

To ensure timely process of submissions a form of cover sheet must accompany all documents submitted to NOPSEMA for assessment from the duty holder that clearly states what the submission is, the reason for submission, and the action required of NOPSEMA including, where appropriate, the applicable legislation. For example, submitting an initial safety case under regulation 2.24 of the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024 (Safety Regulations) for assessment by NOPSEMA.

NOPSEMA provides a cover sheet that can be downloaded from the NOPSEMA website ([Forms and templates | NOPSEMA](#)) for design notifications, operator nomination, proposed SoV, safety case, DSMS, EP, OPP, WOMP, well activity notifications and end of well abandonment reports.

### 3.2 Regulatory time frames

When making submissions, duty holders should be mindful of the time allowed by the applicable legislation for NOPSEMA to provide notification of a decision (e.g. 90 days for a design notification and new safety case, 60 days for a DSMS, 30 days for an EP, revised safety case and WOMP, and 28 days for a revised DSMS).

### 3.3 Submitting

NOPSEMA's preference is that submissions are provided as electronic text searchable PDF's that are clearly labelled and identify the nature of the submission. Submissions can be made via:

- Email to [submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au):

- 35MB maximum size limit per email
- no set limits on number of documents that may be attached to each email up to the maximum limit.

Note: email accounts can reach their limit and freeze out new receipts.

- **NOPSEMA's Secure File Transfer (SFT) system –**

<https://securefile.nopsema.gov.au/filedrop/submissions>:

- provides a file download notice when the documents are accessed by a NOPSEMA staff member, which provides verification that the submission has been received
- 4GB maximum limit per SFT
- no set limits on number of documents that may be attached to each SFT up to the maximum limit.

Please complete all the fields on the secure file transfer submission cover sheet, including a brief description of the purpose of your submission and your preferred contact details. The 'submission type' selected on the cover sheet is used to direct each submission to the appropriate team for processing. Please select the option which describes the purpose of your submission (please select only one purpose for each submission) and provide further details in the description if necessary. We recommend that you include the name, phone number and email address of a contact person for the submission.

Hard copies are not required and, if received, will generally be returned to the sender.

### 3.4 Format

NOPSEMA's preference is that:

- electronic documents are provided in A4 format
- electronic documents are provided in Adobe portable document format (PDF) and are text searchable
- drawings are rendered in PDF and included at full size to ensure scalability (e.g. provide A1 drawings at A1 size, not reduced down to A4)
- electronic documents are not protected in any way.

### 3.5 Controlled documents

NOPSEMA does not participate in the document control systems of other organisations. Submissions that are made to NOPSEMA become Commonwealth records and will be managed accordingly.

### 3.6 Submissions made by titleholders

Submissions of EPs, WOMPs, well activity notifications, end of well abandonment reports and operator nominations are eligible voluntary actions (EVAs) for the purposes of Part 9.6A of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGs Act). In all cases, titleholders submitting these documents remain responsible for compliance with the requirements of Part 9.6A.

### 3.7 Submissions made under the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024

#### 3.7.1 Details of person making submission

Regulation 2.50 of the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024 (Safety Regulations) requires that submissions include:

- the person's name
- if applicable, the name of the person's agent
- the person's or agent's address in Australia
- the person's or agent's telephone number and email address.

#### 3.7.2 Design notifications

In accordance with regulation 2.4(G) a person must submit to NOPSEMA a design notification for a new production facility or for an existing production facility that is to be significantly altered.

A design notification must be submitted to NOPSEMA in sufficient time to allow for any comments made by NOPSEMA to be taken into account in the final design decision and before any construction or alteration work is commenced.

#### 3.7.3 Operator nomination

A facility owner or a titleholder may give NOPSEMA a written notice nominating a person to be the operator of a facility or a proposed facility under regulation 2.1 of the Safety Regulations.

#### 3.7.4 Safety cases and validation

For new safety cases submitted under regulation 2.24 or revised safety cases submitted under regulation 2.30(4) where the reason for submission is triggered by a proposal to modify or decommission a facility, a scope of validation must be agreed with NOPSEMA before the safety case submission can be made. Further guidance on validation is available on the NOPSEMA website ([Safety cases and validation | NOPSEMA](#)).

#### 3.7.5 Safety case opportunity to change and resubmit

Should an opportunity to change and resubmit a safety case be issued to the operator during the safety case assessment process, the operator may resubmit the safety case under Safety Regulation 2.26(3)(b). NOPSEMA requests that the resubmitted safety case also incorporates any information provided in response to any NOPSEMA request(s) for further written information.

NOPSEMA requests that one clean PDF copy of each document, and one copy of each document showing all changes made to the safety case submission is included in the resubmission.

## 3.8 Submissions made under the Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2025

### 3.8.1 WOMPS

If a titleholder applies to NOPSEMA for acceptance of a WOMP in accordance with regulation 78 of the Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2025 (RMA Regulations), the titleholder must give the plan to NOPSEMA at least 30 days before the proposed start of the well activity or, if NOPSEMA gives written approval of another period – within that period. The plan must be in writing and may apply to more than one well if the integrity of each well is subject to similar risks, and may be submitted, with the written approval of NOPSEMA, in part.

Should an opportunity to modify and resubmit a WOMP be issued to the titleholder during the WOMP assessment process in accordance with section 79 of the RMA Regulations, the titleholder may resubmit the plan. NOPSEMA requests that the resubmitted WOMP also incorporates any information provided in response to any NOPSEMA request(s) for further written information.

NOPSEMA requests that one clean PDF copy of each document, and one copy of each document showing all changes made to the WOMP submission is included in the resubmission.

### 3.8.2 Well activities notifications

The titleholder must notify NOPSEMA of well activities at least 21 days before the start of the activity in accordance with section 97 of the RMA Regulations, or at any time before commencement of the well activities listed in section 97 and must notify NOPSEMA no later than 10 days after the completion of the well activity in accordance with section 99.

### 3.8.3 End of well abandonment reports

After a well is permanently abandoned, the titleholder must give a written report to NOPSEMA detailing the abandonment process and the outcome of that process, for assessment in accordance with subsection 73(2) of the RMA Regulations.

## 3.9 Submissions made under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023

An OPP must be submitted by a person (the proponent) in accordance with regulation 6 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023 (Environment Regulations) before commencing an offshore project. OPPs must be in writing and include the name and contact details of the proponent.

### 3.9.1 Making an EP submission

EPs must be submitted in accordance with regulation 26 and may only be submitted by a titleholder or an applicant for a petroleum access authority, petroleum special prospecting authority, pipeline licence, greenhouse gas search authority or greenhouse gas special authority. Applicants are taken to be a titleholder for the purposes of divisions 2, 3 and 5 of Part 4 the Environment Regulations.

Subregulation 26(3) provides that a titleholder may submit an EP for an activity that is, or is part of, an offshore project only if NOPSEMA has accepted an OPP that includes that activity or if the Minister for the Environment has made a decision in relation to the activity under specified sections of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Similarly, in accordance with regulation 38 a

titleholder may submit a revised EP under regulation 26 for a new activity that is or is part of an offshore project. Again, in accordance with regulation 26(3) this may occur only if NOPSEMA has accepted an OPP that includes that new activity or if the Minister for the Environment has made a decision in relation to the activity under specified sections of the EPBC Act.

Subregulation 26(6) provides that an EP must be in writing. The definition of 'writing' in section 2B of the *Acts Interpretation Act 1901* is that it 'includes any mode of representing or reproducing words, figures, drawings or symbols in a visible form.' The guidelines below set out the expected written form of EP submissions to meet these regulatory requirements.

### 3.9.2 Submission and publication of EPs

NOPSEMA must publish all EPs on its website at key points through the assessment process. In order to facilitate publication, EP submissions must be delivered in two parts, as follows:

- environment plan (for publication); and
- sensitive information, including full text consultation transcripts and personal information provided during relevant persons consultation (not for publication). Further information on what constitutes sensitive information can be found in NOPSEMA's Environment Plan Assessment Policy (N-04750-PL1347, section 4.5.2 ([Policies | NOPSEMA](#))). Specific instructions on preparing the sensitive information part of an EP are set out below in section 3.9.2.

The oil pollution emergency plan (OPEP) and the oil spill monitoring program (OSMP) may be submitted separately as two additional documents.

Where appendices are large documents, these should be provided as a single separate document. Alternatively, the titleholder may embed appendices within the corresponding EP, OPEP and/or OSMP.

The report on consultation contained in the EP under regulation 24(b) may follow the structure and format of NOPSEMA's template for the 'Titleholder report on consultation in the preparation of an Environment Plan' (N-04750-FM2281 ([Forms and templates | NOPSEMA](#))).

Under regulation 35(6), titleholders are required to submit an EP summary to NOPSEMA within 10 days following notice of acceptance of the EP. As EPs are published in full on acceptance on NOPSEMA's website, titleholders may incorporate the EP summary into the EP to meet this obligation, rather than submit a separate EP summary. Where this option is chosen, an EP summary statement must be incorporated into the EP by titleholders on submission. For further guidance on this, see the Environment Plan Summary Statement (N-04750-FM1848) on NOPSEMA's website ([Forms and templates | NOPSEMA](#)).

Titleholders must ensure that appropriate quality assurance and quality control processes are in place when preparing EPs for submission so they are suitable for publication, free from errors, omissions, broken bookmarks/hyperlinks and information included is clearly legible.

### 3.9.3 Preparing the sensitive information part of an EP

To support timely and effective assessments of EPs, from 30 November 2025 titleholders must include the following in the sensitive information part of new EP submissions:

- a table of contents listing all relevant persons, grouped by category with hyperlinks/bookmarks to the corresponding section heading for each categorical group and relevant person
- the full text records of consultation for each relevant person set out in chronological order, with a single copy only of each full text record

- a unique identifier allocated to each full text record for cross-referencing with the titleholder report on consultation and other parts of the EP as appropriate
- the original unaltered email header information (e.g. email recipients, date sent etc.) for any email threads.

For EP submissions that are under assessment before 30 November 2025, the above will not be requested by NOPSEMA.

### 3.9.4 Publication of submission information

Following NOPSEMA's provisional decision that an EP is complete under regulation 27, NOPSEMA must publish on its website information about that EP. Specifically, subregulations 28(1) and (2) require the publication of the following:

- the name of the titleholder
- a description of the activity or stage of the activity to which the EP relates
- the location of the activity
- a link or other reference to the place where the accepted OPP (if any) is published
- details of the titleholder's nominated liaison person for the activity, and
- where the EP is a revised EP, the reasons for revision.

Regulation 35(4) also requires NOPSEMA to publish a notice given to the titleholder of the decision (if any) made by the regulator in relation to the EP.

In order to achieve efficient publication, NOPSEMA requests titleholders provide the following information:

- **an overview of the activity description and activity location** (approx. 250-500 words) including general details of the stages and aspects of the activity, an outline of the operational details, a proposed timetable (including seasonal timing and duration) and a written overview of the activity location with reference to particular landmarks (e.g. 100km north-west of Karratha). Where the EP is a revision, the reasons for the revision. This information may be provided by the titleholder as a discrete section in the EP (e.g. an 'overview of the activity' as an introduction to the comprehensive description of the activity required by regulation 21) enabling NOPSEMA to simply publish the information directly from the EP submission.

Alternatively, titleholders may wish to provide a separate activity overview in a free text field of the EP submission cover sheet. If this alternative approach is taken, it is a requirement that the information provided in the EP submission cover sheet by the titleholder for publication is representative of material documented in the EP submitted to NOPSEMA.

- **an activity location map** showing the activity location within its regional context including depth contours and important or relevant locations/places/features referred to in the EP including nearest coastal areas, environmental sensitive location(s), Commonwealth marine reserves with relevant zoning and state/territory, Commonwealth and international boundaries where applicable. The map should be at a suitable size and scale, include a scale bar, legend, information caption and labels as required in legible fonts. In addition, it is requested that the map be of publishing quality (e.g. 150 dpi or greater), file size preferably no larger than 2MB and file type preferably in JPG (.jpg, .jpeg) or PNG (.png) format.

In circumstances where a titleholder declines to provide this information, NOPSEMA will publish the full 'description of the activity' contained in the EP submission in order to meet the requirements of regulation 28(1).

In the event that the activity description or the location map changes during the assessment process, the titleholder must ensure that an updated map and description is provided to NOPSEMA with the resubmitted EP for publication.

### 3.9.5 Resubmission after public comment

Following the completion of the public comment process for seismic and exploration drilling EPs and after considering any comments received, the titleholder is required to resubmit the EP to NOPSEMA for assessment and further publication. The EP submission must include:

- the documents listed in section 3.9.1 in the specified parts, format and size
- one fully searchable PDF and one word version of the titleholder's report on public comment.

Titleholders are requested to use NOPSEMA's template for this report to enable consistent publication of these reports. All sensitive information must be excluded from the titleholder report on public comment.

### 3.9.6 Resubmission of the EP following an opportunity to modify or request for information

NOPSEMA requires that titleholders resubmit the entire EP in response to an opportunity to modify and resubmit the EP or a request for further written information.

NOPSEMA requests that one clean PDF copy of each document, and one copy of each document showing all changes made to the EP submission is included in the resubmission.

### 3.9.7 Financial assurance requirements

A demonstration of financial assurance is required prior to acceptance of an EP for a petroleum activity in accordance with regulation 16. This should be provided using the financial assurance confirmation form which should be submitted at the time of EP submission. A failure to provide confirmation of financial assurance will prevent NOPSEMA from accepting an EP.

Further information on financial assurance requirements is provided on the NOPSEMA website in the 'Financial assurance for petroleum titles guideline'.

## 3 Related documents

N-04030-FM2320 – Design notification submission cover sheet

N-01000-FM0008 – Nomination form: Operator of a facility

N-04200-FM0880 – Proposed scope of validation submission cover sheet

N-04200-GL0525 – Validation

N-04300-FM0268 – Safety case submission cover sheet

N-04500-FM1000 – Diving Safety Management System (DSMS) submission cover sheet

N-04600-FM1600 – WOMP or WOMP Revision - submission cover sheet

N-04600-FM1618 – Well activity notification cover sheet

N-04600-FM1634 – End of Well Abandonment Report Cover Sheet  
N-04730-FM1465 – Financial assurance confirmation  
N-04750-PL1347 – Environment assessment policy  
N-04750-FM1257 – Environment plan submission cover sheet  
N-04790-FM1653 – Offshore project proposal submission cover sheet  
N-04730-GL1381 – Financial assurance for petroleum titles  
N-04750-FM1846 – Titleholder report on public comment  
N-04750-FM1848 – Environment plan summary statement  
N-04750-FM2281 – Titleholder report on consultation in the preparation of an Environment Plan

Links to related documents available on our website:

[Forms and templates | NOPSEMA](#)

[Guidelines | NOPSEMA](#)