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Chairman
NT EPA
GPO Box 3675
DARWIN NT 0801

Dear Chairman

Santos feedback on the *'Draft Advice: Response to Dr Hawke's Review'*

Thank you for the opportunity to consider and provide feedback on the Draft Advice regarding Dr Allan Hawke's Review of the Northern Territory (NT) Environmental Assessment and Approval processes. The following outlines Santos' feedback on the proposed reform of the existing processes of environmental impact assessment, environmental and project approval and management.

Santos supports the NT Environmental Protection Authority (NT EPA) position for moving directly to a single environmental approval framework. A single environmental approval framework, or 'one stop shop' for large project approvals, where a single agency acts as an assessment manager, is essential to facilitating multiple State agency interests in assessing a proponent's proposal in an efficient and balanced manner. Santos does not believe that the NT EPA is necessarily best placed to facilitate this assessment process under a single environmental approval regime.

In securing alignment with Commonwealth processes to minimise the regulatory burden on project proponents, a Territory co-ordinated EIS / EIA processes offers the most value. This requires all Territory approvals to be covered by the approval framework, not just those specific to environmental regulatory and assessment functions. This requires all Territory agencies to be participating and promoting the concept of an efficient assessment framework and process. The draft advice does not presently articulate the details on which existing NT approvals would be amalgamated into the NT EPA model of a single environmental approval framework.

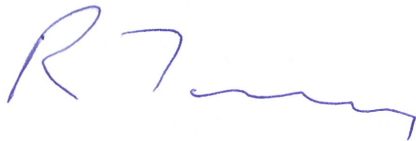
Santos supports the Hawke Review's original recommendation (1) for establishing an accountable environmental approvals system and suggests public trust and confidence in regulation can be established under a regime that articulates Government expectations regarding assessment process requirements in a transparent and publically accessible format. Further to Dr Hawke's points in recommendation (1) and (10), such an approach might include publicly available Guidelines on the information to be supplied for assessment, including standardised sectoral Terms of Reference for EIAs, guidelines on acceptable modelling techniques and assumptions (economic, water, ecological, transport), guidelines on public notification requirements and guidelines on assessment steps and timeframes.

Santos supports the Hawke Review's original recommendation (2) for major projects facilitation, and suggests the Department of Primary Industry and Resources or Department of Infrastructure, Planning and Logistics are best placed to facilitate a single approval, given they have jurisdiction for the majority of other non-environmental State interests and can adopt EIA/EIS assessments as suitable for issuing an amalgamated single approval. Alternatively, Santos would support the establishment of a dedicated NT major projects coordination unit, similar to the Office of the Coordinator General in Queensland.

Santos also supports the Hawke Review's original recommendation (11) for charging the NT EPA with a monitoring and assurance role over any new NT assessment and approval process.

Should you have any queries or wish to further discuss the content of this letter, please do not hesitate to contact Nick Fox, Santos Head of Environment and Access, on 08 8116 5151 nick.fox@santos.com

Yours sincerely

A handwritten signature in blue ink, appearing to read 'R Johns', with a long horizontal flourish extending to the right.

Rhodri Johns

Exploration Manager Onshore Australia