



Oil and Gas Division  
Department of Industry Science and Resources (DISR)  
Industry House 10 Binara Street  
Canberra ACT 2601

7 March 2024

**Submission in response to the DISR Consultation Paper  
*Clarifying consultation requirements for offshore petroleum and greenhouse gas storage  
regulatory approvals***

The **Federation of Victorian Traditional Owner Corporations** is the Victorian state-wide body that convenes and advocates for the rights of Traditional Owners while progressing wider social, economic, environmental and cultural objectives. We support the progress of agreement-making and participation in decision-making to enhance the authority of **Traditional Owner Corporations** on behalf of their communities.

As a peak body representing the rights and interests of Corporations with Sea Country responsibilities, we are a proud member of the **Sea Country Alliance**. We support the Alliance submission to this Consultation Paper, which puts forward concrete recommendations in response to the two overarching questions contained in the Consultation Paper.

The Alliance submission appropriately makes clear that the necessary identification of Traditional Owner rights in law and actuality, arise communally but exist at both a communal and individual level. Such complexity requires reform of the existing regulatory structures and not just adaptation in the processes associated with the existing structures.

Similar to management of native title rights and interests under the *Native Title Act 1993* (Cth) (**NTA**), the Alliance Submission proposes resolution of the shortcomings of these regulatory structures through adoption of processes similar to those employed for many decades in the NTA.

We support the establishment of a Working Group, comprising appropriate senior representatives of Traditional Owner organisations, industry bodies and relevant government agency representatives. The Working Group should be established under the auspices of and resourced by the Minister.

The implementation of the Alliance submission recommendations would both secure Traditional Owner rights to speak for Sea Country and provide the certainty and efficiency in project approvals that is necessary to support a viable offshore gas industry.

Yours sincerely,



Ben Gordon  
Operations Manager