



# 2019 APPEA Taxation and Commercial Conference

24-25 OCTOBER 2019 | QT, LONDON CIRCUIT, CANBERRA



CONFERENCE DINNER

CONFERENCE SACHELS

WELCOME RECEPTION



# 2019 APPEA Taxation and Commercial Conference

PROGRAM—Pre-Conference and Day 1

## WEDNESDAY 23 OCTOBER

4.30pm–  
6.30pm **CONFERENCE REGISTRATION**  
LEVEL 1 FOYER, QT HOTEL

5.30pm–  
7.30pm **CONFERENCE WELCOME COCKTAILS**  
QT LOUNGE, LEVEL 15, QT HOTEL

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## THURSDAY 24 OCTOBER

7.30am–  
4.00pm **CONFERENCE REGISTRATION**  
LEVEL 1 FOYER, QT HOTEL

8.30am–  
10.15am **PLENARY 1: SETTING THE CONTEXT**  
*Session Chair: Andrew McConville, APPEA Chief Executive*

BALLROOM 1-2

**Opening comments from the Chair**

**Australian Government address**

**The Hon Michael Sukkar MP** Assistant Treasurer

**Effective engagement between taxpayers and regulators: Lessons learnt**

**Ali Noroozi** PwC

**Strengthening the ATO and taxpayer interface: Priorities and expectations**

**Rebecca Saint** Australian Taxation Office

10.15am REFRESHMENT BREAK

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10.45am **PLENARY 2: THE ECONOMIC AND POLICY ENVIRONMENT**  
*Session Chair: Damian Dwyer, APPEA*

BALLROOM 1-2

**The changing global landscape — implications for the Australian economy**

**Paul Bloxham** HSBC Bank Australia Ltd

**Assessing Australia's competitiveness as a global oil and gas investment destination**

**Chris Graham** Wood Mackenzie

**The Australian gas market — understanding the impact of policy uncertainty and interventions**

**Saul Kavonic** Credit Suisse Australia

**LNG — Australia's role in decarbonising global emissions**

**Speaker to be confirmed** EY

12.30pm LUNCH

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# 2019 APPEA Taxation and Commercial Conference

## PROGRAM—Day 1

### THURSDAY 24 OCTOBER

1.30pm

#### **PLENARY 3: STRENGTHENING COMMUNITY SUPPORT — TRANSPARENCY AS A KEY DRIVER FOR INDUSTRY GROWTH**

BALLROOM 1-2

*Session Chair: Andrea Laing, Shell Australia*

##### **Tax transparency and building community confidence**

**Ann-Maree Wolff** Board of Taxation & Rio Tinto Australia

##### **Time for the transparency of everything — where next for the Extractive Industries Transparency Initiative, and what does it mean for Australia?**

**Sefton Darby** KPMG

##### **The role of science and engagement in strengthening community understanding**

**Damian Barrett** CSIRO

##### **Harnessing community support — pathways for the Australian gas industry**

**Sarah Browne** APPEA

3.00pm

#### REFRESHMENT BREAK

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3.30pm

#### CONCURRENT SESSIONS 1&2

##### **1 Corporate tax — technical income tax issues**

*Session Chair: Therese Stephenson, Origin Energy*

BALLROOM 1-2, LEVEL 1

##### **Capitalisation of labour costs — understanding the capital vs revenue distinction: Where are we now?**

**Janelle O'Hare & Harold Payne** PwC

##### **Transfer pricing issues connected with intra-group funding**

**Caroline Walker & Danielle Donovan** EY

##### **Unpacking thin capitalisation policy — past, present and future**

**Carlo Franchina** KPMG

##### **2 Commercial and operational issues**

*Session Chair: Justine Neep, Senex Energy*

BALLROOM 3, LEVEL 1

##### **Tax implications arising from facility decommissioning obligations and strategies**

**Kenneth Wee** Deloitte

##### **Queensland petroleum royalty post the APLNG Supreme Court decision**

**Emily Falcke** PwC

##### **The Junior Minerals Exploration Incentive — a model for oil and gas?**

**Craig Yaxley & Catherine Dean** KPMG

##### **Taxation issues associated with oil and gas M&A transactions for both traditional and non-traditional industry participants**

**Michael Chang & Ian Iskandar** IEY

6.30 for  
7.00pm

#### CONFERENCE DINNER

GOLD CREEK STATION, HALL ACT

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# 2019 APPEA Taxation and Commercial Conference

## PROGRAM—Day 2

### FRIDAY 25 OCTOBER

8.30am–  
2.00pm **CONFERENCE REGISTRATION**  
LEVEL 1 FOYER, QT HOTEL

8.45am **KEYNOTE ADDRESS** BALLROOM 1–2

*Session Chair: Andrew McConville, APPEA*

#### **The role of the oil and gas in a modern economy — the Opposition's perspective**

**The Hon Joel Fitzgibbon MP** Shadow Minister for Agriculture and Resources

9.15am **PLENARY 4: GROWTH AND PROJECT FUNDING — CONSIDERATIONS AND OPTIONS** BALLROOM 1–2

*Session Chair: Shane Simmons, Arrow Energy*

#### **Capital and funding issues: A company perspective**

**Stuart Nicholls** Strike Energy

**Thomson Naude** Carnarvon Petroleum

**Shane McDermott** Buru Energy

**Virginia Suttell** Cooper Energy

**Anthony Nielson** Santos

#### **Securing financing — factors to consider and recent trends**

**Michael Bona and Tom Carter** PwC

10.45am **REFRESHMENT BREAK** **SPONSORSHIP AVAILABLE**

11.15am **CONCURRENT SESSIONS 3&4**

#### **3 Workshop: Discharging the burden of proof for non-operator JV participants**

*Session Chair: Bill Barton, BP Australia*

BALLROOM 1–2

#### **This session will focus on a range of non-operator issues, including:**

- ATO expectations
- Challenges, constraints, risks and opportunities
- Information sharing
- Interaction with JVOA's, governance frameworks and competition issues
- Options for the development of a best practice standard model

Workshop Coordinator: **Will Campbell** Deloitte

#### **4 Taxation issues**

*Session Chair: Peter Hyman, Inpex*

BALLROOM 3

#### **Managing tax risk in the oil and gas industry**

**Keith Swan** KPMG

#### **Earn-out and rollover implications in an oil and gas context — lessons for dealings and transactions**

**Enzo Coia** Deloitte

12.30pm **LUNCH** **SPONSORSHIP AVAILABLE**

1.45pm **PLENARY SESSION 5: PRRT — WHERE DO WE STAND TODAY?** BALLROOM 1–2

*Session Chair: Marc Lewis, Woodside Energy*

#### **Navigating PRRT post the Callaghan Review and the 2019 legislative amendments**

**Janelle O'Hare** PwC & **Kenneth Wee** Deloitte

#### **Administration and compliance priorities**

**Faith Harako and Jonathan Chamarette** Australian Taxation Office

#### **Review of the gas transfer price regime — Treasury update**

**Geoff Francis** Federal Treasury

#### **Comparable prices for feedstock gas — do they exist for PRRT purposes?**

**Jacques van Rhyn** Deloitte

3.30pm **CONFERENCE CLOSE**