

The Petroleum Resource Rent Tax (PRRT)

Is it working and should it be replaced?

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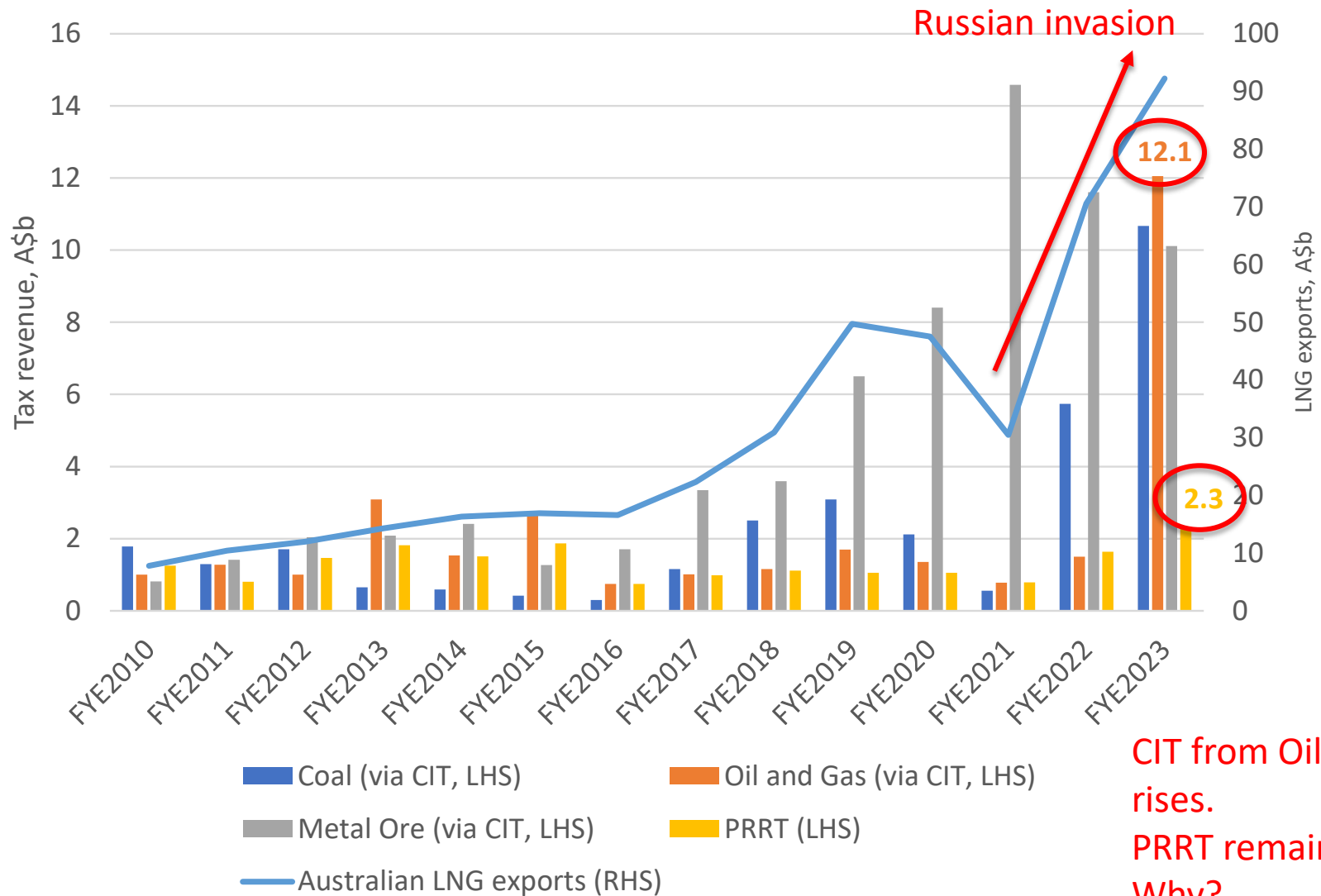
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Australia's LNG Boom

Why Has PRRT Revenue Been So Small?





Not all LNG projects pay Petroleum Resource Rent Tax (PRRT)

When oils ain't oils

Australia has ten major LNG plants. Green shading implies PRRT-liable.

- **WA:** North-west shelf, Pluto, Forgon, Prelude, and Wheatstone
- **QLD:** APLNG, QCLNG, and GLNG
- **NT:** Darwin LNG and Ichthys LNG

From the 2023-24 Federal Budget, delivered May 2023:

To date, not a single LNG project has paid any PRRT and many are not expected to pay significant amounts of PRRT until the 2030s

About 90% of Australia's oil, gas and LNG industry costs can be attributed to LNG...

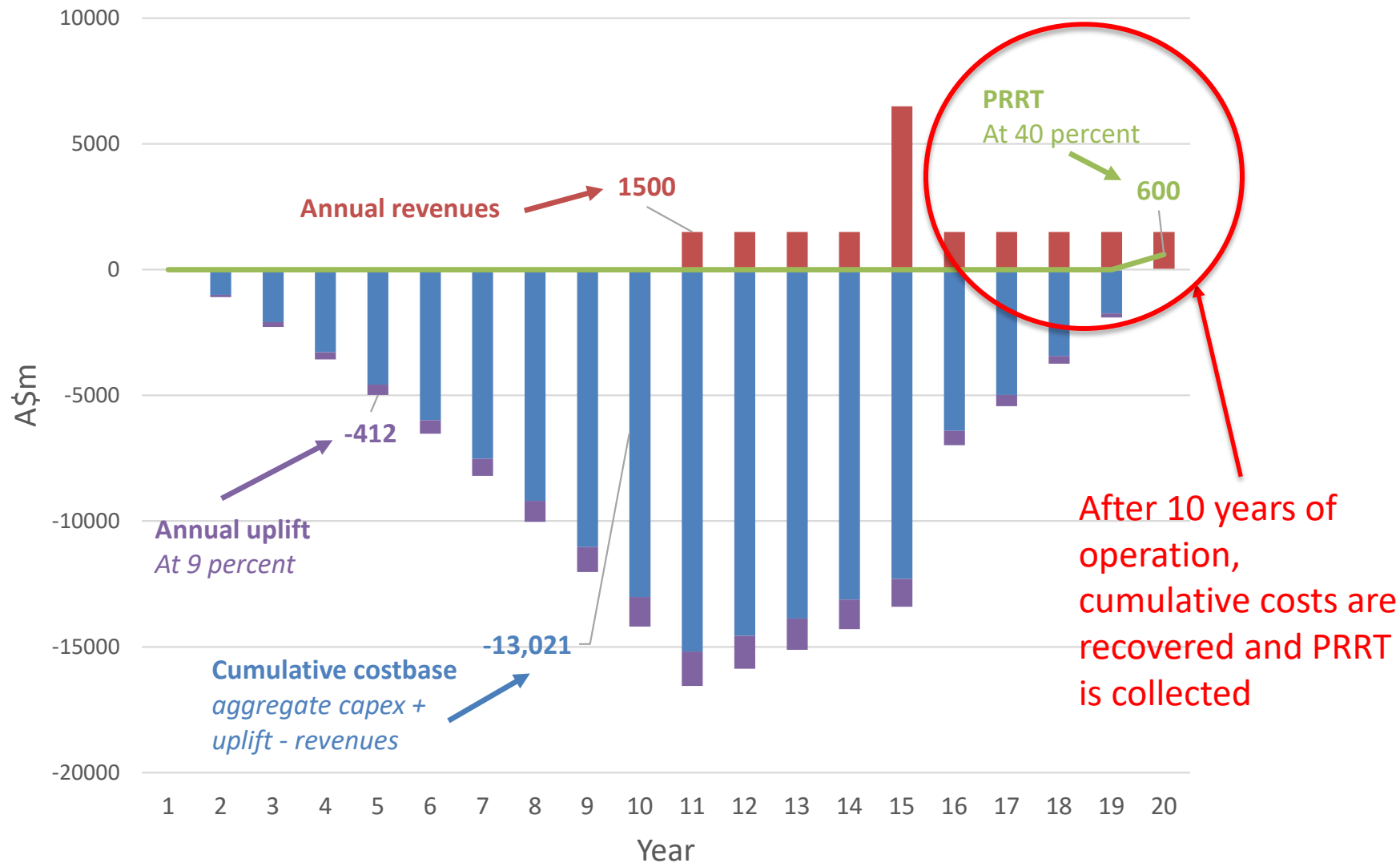
...but all the A\$1.5b to A\$2b in PRRT collected annually comes from legacy oil and pipeline gas projects offshore, e.g., the Gippsland and Otway Basin.

Four questions:

- How does the PRRT work?
- What is the PRRT base when it comes to LNG?
- Is profitability for Australian LNG particularly low compared to peers internationally?
- Are there rents to tax?

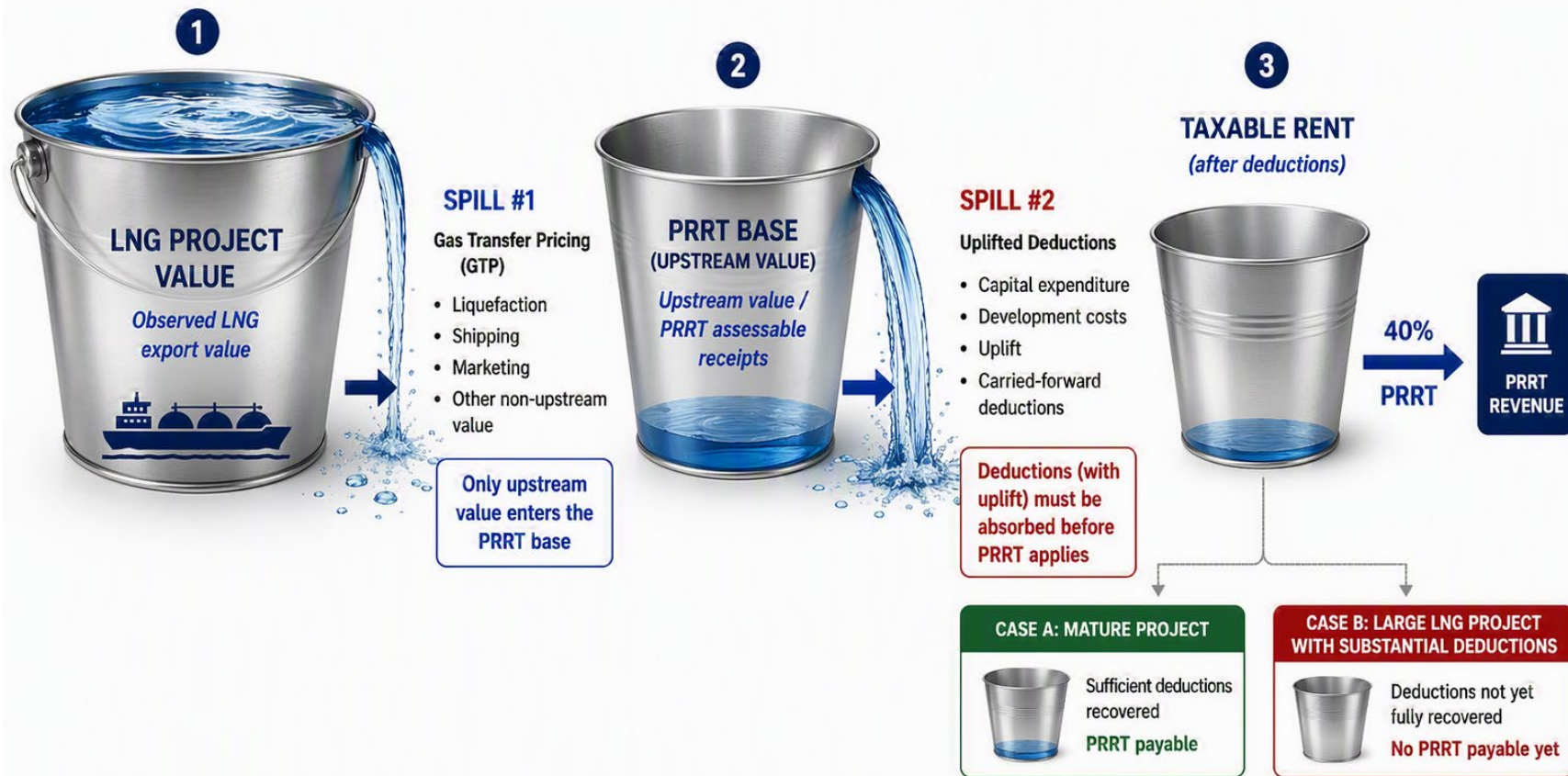
A stylized 10-year, A\$10b investment

When might we collect PRRT?



The Petroleum Resource Rent Tax (PRRT) base

Why can LNG export revenues be large while PRRT revenues remain small?



LNG export value → upstream PRRT value → taxable rent are not the same thing.

Value is first allocated through gas transfer pricing, then reduced by uplifted deductions before the 40% PRRT rate is applied.

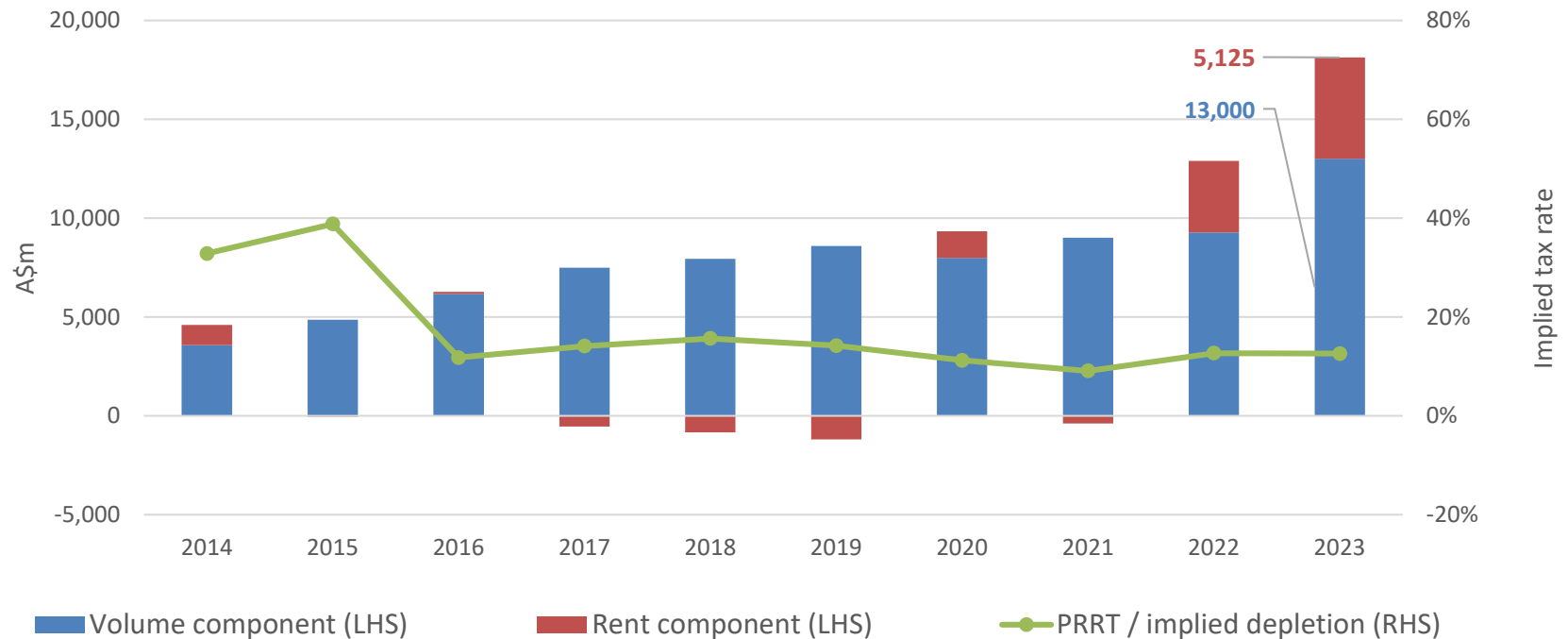
Are profit margins competitive with peers?

	Australia <i>Oil and Gas Extraction</i>		Norway <i>Inferred Oil and Gas from aggregate Mining and Quarrying</i>	
Cost Structure 2022/23	Value, A\$m	Share of total cost	Value, A\$m	Share of total cost
Gross Operating Surplus	95,962	73%	138,064	79%
Other costs	34,676	27%	36,322	21%
Total costs	130,638	100%	174,386	100%
Tax collections, 2022/23	14,338		66,309	
<i>Implied rate relative to gross GOS</i>	<i>15%</i>		<i>48%</i>	



Is there evidence of resource rents?

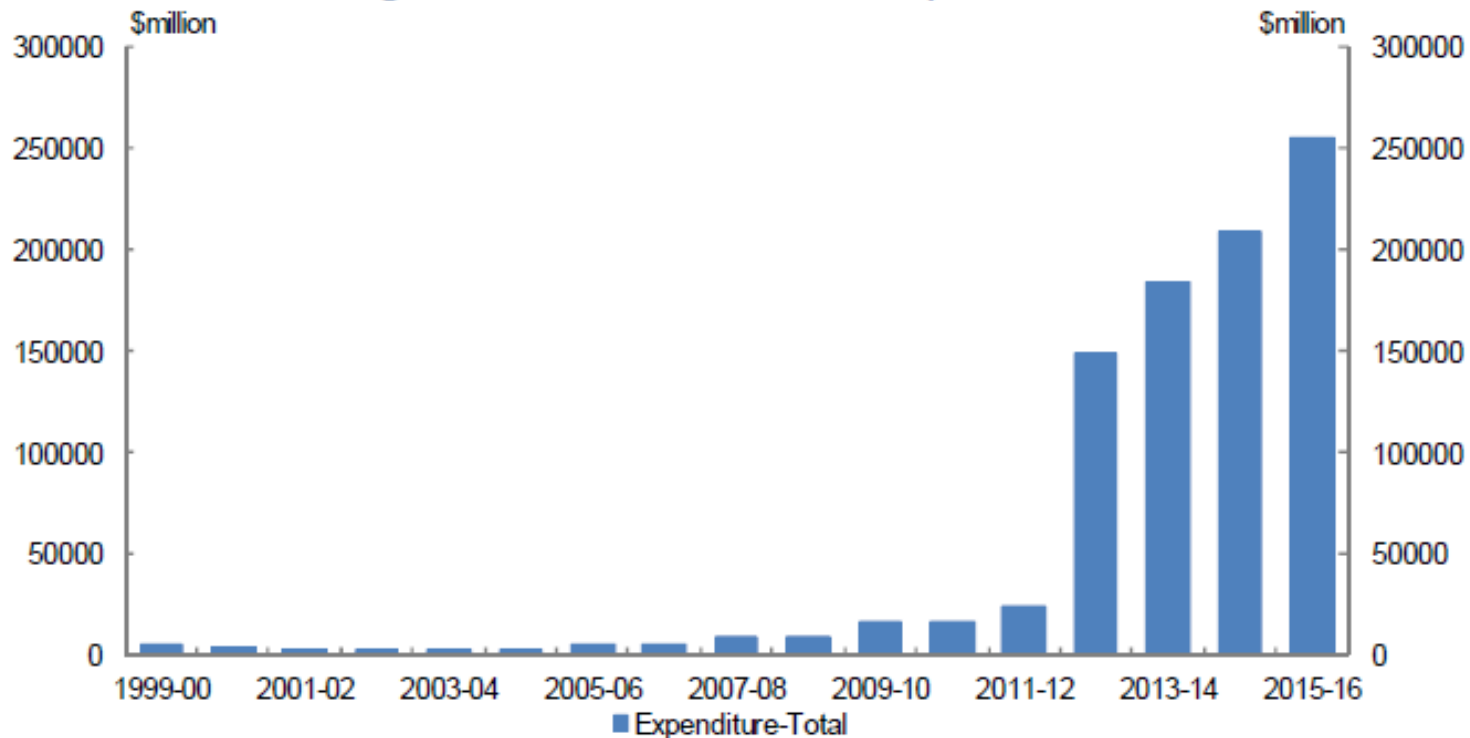
Implied resource depletion in A\$m (LHS) and the Implied PRRT rate (RHS)



How are expenditure pools tracking?

No comprehensive public source of updated expenditure-pool data exists

Figure 2.3 — Total deductible expenditure



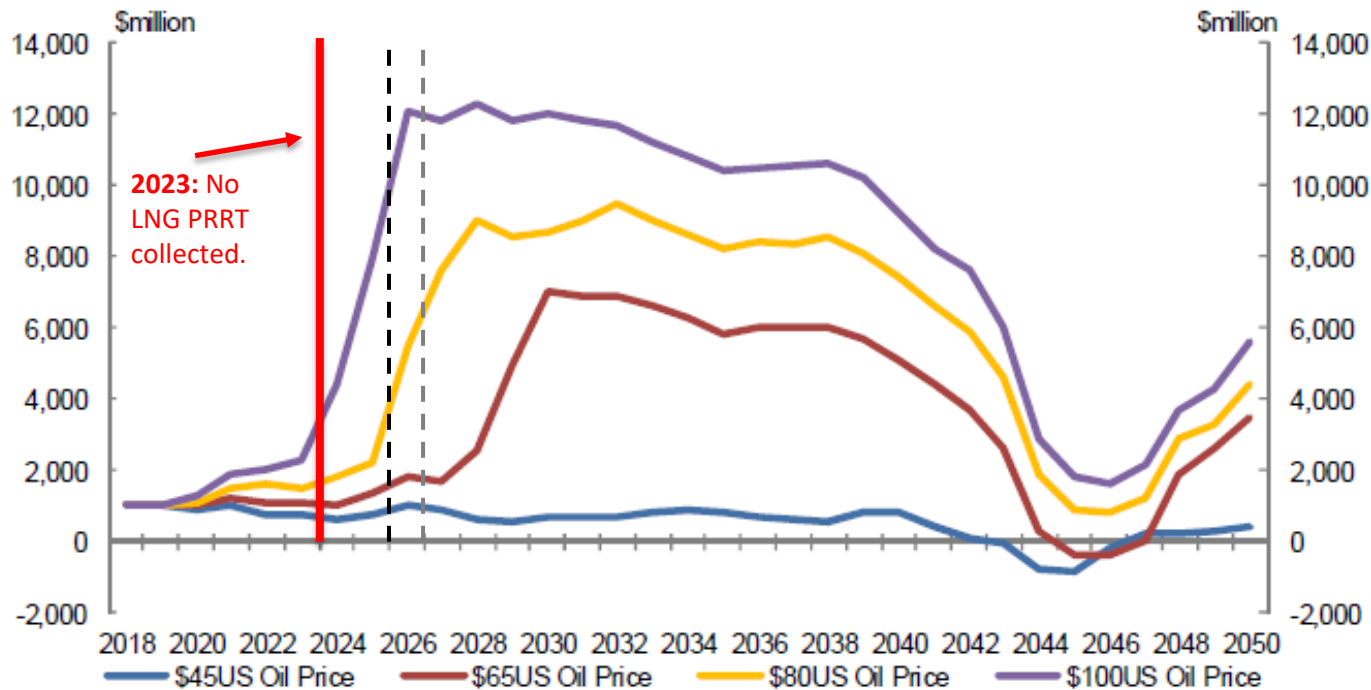
Source: ATO Taxation Statistics, ATO submission.

Source: Callaghan, M. (2017). *Review of the Petroleum Resource Rent Tax*. Australian Government, Canberra.

How may revenues evolve over time?

Annual forecast revenues in Australia remain well below other gas exporters

Figure 2.9 — PRRT revenue at different oil prices



Source: Petroleum Resource Rent Tax Review Secretariat.

Source: Callaghan, M. (2017). *Review of the Petroleum Resource Rent Tax*. Australian Government, Canberra.

Revenues: reality versus forecasts

- Global oil price guide: US\$92 (22-23), US\$79 (24-25), and approx. US\$92 (25-26).
 - 2022-23 reality vs **forecast**: A\$2.3b vs **A\$1b** or **A\$1.7b**
 - 2024-25 reality vs **forecast**: A\$1.42b vs **A\$1.7b** or **A\$3.5**
 - 2025-26 estimate vs **forecast** : A\$1.5b vs **A\$1.7b** vs **A\$7b**

Key takeaways

- Australia's LNG industry is large and profitable.
- Evidence suggests substantial resource rents exist.
- PRRT revenues remain modest even during gas-price booms.
- Tax-base design and uplifted deductions matter more than the statutory tax rate.
- The central policy question is whether the PRRT remains fit for Australia's modern petroleum extractives industry.