

**From:** [Cameron Grebe](#)  
**To:** [Stuart Smith](#)  
**Cc:** [REDACTED] [Suzanne Hillier](#)  
**Subject:** FW: Urgent: NOPSEMA follow up on communicating Greenhouse gas emissions treatment in assessment and decision making [DLM=For-Official-Use-Only]  
**Date:** Thursday, 14 March 2019 6:36:14 PM

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Hi Stuart,

For background when you are deciding on Scarborough OPP.

I support the text proposed in the RFI to include Indirect CO2 emissions for context given the DoEE decision brief for Browse upstream referral under EPBC Act identifies that the Department expect NOPSEMA to similarly consider direct and indirect CO2 emissions for Scarborough.

We will pursue work in parallel to clarify how we would see these issues being considered in decision making in Stage 2 assessment for OPPs.

Thanks

Cameron

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**From:** Gregory Manning [REDACTED]  
**Sent:** Thursday, 14 March 2019 12:43 PM  
**To:** Cameron Grebe [REDACTED]; James Tregurtha [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Urgent: NOPSEMA follow up on communicating Greenhouse gas emissions treatment in assessment and decision making [DLM=For-Official-Use-Only]

Hello Cameron

And thank you for your time on the phone earlier with James. James has asked me to respond on the email below. As discussed, we don't have any specific expectations of NOPSEMA in relation to your consideration of the Scarborough project including by virtue of the decision made by the Department in relation to the Browse development. As far as the Department is concerned the strategic assessment in place with NOPSEMA and the usual considerations that go along with that continue to operate in the usual fashion under existing EPBC Act policy settings and arrangements. In that sense we also don't have any comment on the proposed text NOPSEMA is considering for communication back to the proponent.

I hope that assists. Happy to discuss further including if there is anything else we can provide.

Regards

Greg.

Greg Manning

Assistant Secretary, Assessments (WA, SA and NT) and Post Approvals

Department of the Environment and Energy

51 Allara Street, CANBERRA CITY ACT 2600

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**From:** Cameron Grebe

**Sent:** Tuesday, 12 March 2019 3:55 PM

**To:** James Tregurtha

**Cc:**

**Subject:** Urgent: NOPSEMA follow up on communicating Greenhouse gas emissions treatment in assessment and decision making

Good afternoon James,

Thanks for your time to meet with Stuart Smith and me last week. We appreciate the opportunity to discuss the background to the expectations re greenhouse gases and how both indirect and indirect emissions are to be treated in assessment and decision making under environmental approval processes.

We are keen to work closely with you to clarify the details and look forward to jointly move forward on this issue across the range of petroleum resource projects in various stages of planning and approval processes.

In the interim, we have a decision due this Thursday on the Scarborough OPP for Woodside as part of the stage 1 (suitability for publication for public comment) assessment.

I realise the timeframe is short but to ensure a consistent approach is adopted in communicating content expectations in this area across both EPBC and OPGGS environmental approval documents, we felt it was important to get your agreement to the text the decision maker (NOPSEMA CEO) would communicate in NOPSEMA's decision to the proponent. As it is only a request for further information it is relatively high level and we would therefore seek your support for joint clarifications with the proponent so that further details can be discussed and alignment on expectations from both NOPSEMA and Department processes can be maintained.

Urgent request for response on draft text for Request for information decision:

It would be greatly appreciated if you please let us know by midday Thursday (your time) if you're comfortable with the text (below) or whether you require amendments to reflect your expectations for equivalent treatment in the Browse EIS when it reaches that stage? We have drafted text based on our understanding reached through discussions last week and the relevant decision documentation we have been provided, so I expect there may be clarification or edits required.

Many thanks for your assistance. Happy to discuss further by phone.

For info [REDACTED] is managing the assessment (and is NOPSEMA EPBC Program contact) and is copied along with the lead assessor ([REDACTED] and policy contact ([REDACTED])). If you are able to request staff communicate responses to all NOPSEMA staff copied that will assist in timely progress of our decision making this end.

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***Proposed draft text for inclusion in the formal 'Request for Further Written Information' text to be used for Scarborough OPP:***

*Woodside are to provide information on greenhouse gas emissions for the project including;*

- *A quantified inventory of all GHG emissions arising from the project including;*
  - o *direct emissions - NGER Act Scope 1; and*
  - o *indirect emissions - NGER Act Scope 2 and 3 emissions and related emissions from the Scarborough project at facilities other than those that form part of the Scarborough OPP but over which Woodside has partial or complete operational control.*
- *For direct emissions;*
  - o *describe and evaluate the extent of potential impacts and risks to the local airshed related to the Scarborough upstream operations.*
  - o *provide a full description and evaluation of management measures available, including alternatives analysis, to reduce potential impacts and risks to the local airshed and reduce GHG emissions over the life of the project to acceptable levels.*
  - o *provide environmental performance outcomes for the ongoing management of impacts and risks of direct GHG emissions to the local airshed for the life of the project.*
- *For all GHG emissions*
  - o *Describe the contribution of total direct and indirect emissions for the life of the project including the contribution of these emissions to national and international GHG emissions and climate change.*
  - o *Describe how total GHG emissions over the life of the project are to be managed in accordance with national and international mechanisms that account for and seek to reduce these impacts to acceptable levels.*

*o Provide environmental performance outcomes that provide for ongoing alignment with national and international mechanisms for the management of GHG emissions for the life of the project.*

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**Cameron Grebe**

*Head of Division - Environment*

National Offshore Petroleum Safety & Environmental Management Authority

T: [REDACTED] M: [REDACTED]  
E: [REDACTED]

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