

## ENVIRONMENTAL IMPROVEMENT NOTICE

To: Woodside Burrup Pty Ltd

In conducting an petroleum environmental inspection in relation to the offshore petroleum premises of the Pluto 4D Marine Seismic Survey (MSS) petroleum activity (PGS Apollo), I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the titleholder named above has contravened and is likely to contravene again:

Regulation 7 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (the Environment Regulations)

1. The reasons for my opinion are:
  - 1.1 Findings from the inspection I conducted at the offshore premises of the Pluto 4D MSS provide me with reasonable grounds that led inspectors to believe that the activity has not been implemented in accordance with the accepted environmental plan.
  - 1.2 Specifically, the implementation of the Woodside Change Management Operating Standard and risk assessment process described in the EP did not ensure that the environmental impacts and risks of extending the duration of the Pluto 4D MSS activity from approximately 30 days to approximately 55 days, were adequately risk assessed (Management of Change/Key Decision Log DRIMS#1056475, approved on 5 November 2015).
  - 1.3 The local change management process in use does not ensure that:
    - Detailed justification is provided for changes to the activity that may have a new, or increased impact on, the environment;
    - There are adequately supported conclusions in relation to environmental impacts and risks of the proposed change;
    - Consultation with external stakeholders was effectively undertaken prior to the approval of the change to the activity;
    - The risk assessment includes sufficient consideration of additional and/or alternative environmental management controls necessary to ensure that the change will continue to be managed to ALARP and acceptable levels; and
    - There is a robust process for determining whether the change is a significant modification or new stage of activity that is not provided for in the accepted environment plan, requiring revision to the EP under Regulation 17(5) of the Environment Regulations.
- 2 As a result of this contravention I am satisfied that there is, or may be, the following significant threat to the environment:
  - 2.1 Petroleum activities subject to the local processes for change management may expose the environment to unidentified and unmanaged impacts and risks such as disruption to fishing effort, loss of catch, and/or significant impacts on matters protected under Part 3 of the *Environmental Protection and Biodiversity Conservation Act 1999*.

2.2 The environment that is subject to the threat is:

- Matters protected under Part 3 of the *Environmental Protection and Biodiversity Conservation Act 1999*.
- The social and economic features of the environment as defined in the Environment Regulations.

3 The titleholder is required to take action within 60 days of the date of this notice to prevent or reduce the threat.

4 The following action must be taken by the titleholder within the period specified above:

4.1 Review the implementation of the management of change and risk assessment process. The review should include:

- Investigation and reporting of the deficiencies in the management of change process; and
- Amendment of applicable local processes and instructions on how to manage change in accordance with the Woodside Change Management Operating Standard;

4.2 Or, by any other means comply with Regulation 7 of the Environment Regulations.

**Signed:**

██████████

**NOPSEMA inspector**

**Dated: 24 December 2015**

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

|                   |   |
|-------------------|---|
| Name:             | ██████████  |
| Position:         | Environment Specialist  |
| Address:          | Send in electronic format via email to:<br><a href="mailto:submissions@nopsema.gov.au">submissions@nopsema.gov.au</a> |
| Telephone number: | +61 8 6188 8700   |

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **617** has been complied with by:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**NOTES:**

1. Under clause 11D of Schedule 2A to the Act, a titleholder who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the titleholder has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each premise at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
  - (a) the operator's representative at the facility if the premises are a facility, and
  - (b) the vessel master if the premises are a vessel under the control of a master, and
  - (c) the owner, if the premises are owned by a person other than the titleholder.
4. Information on how to make a complaint about NOPSEMA's regulatory services is provided online in the Regulatory Services Charter (<http://www.nopsema.gov.au/assets/document/NOPSEMA-Regulatory-Service-Charter-October-2014.pdf>)
5. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.