

# NOPSEMA Investigation – Minerva Decommissioning and Field Management – Complaint Regarding Woodside’s Handling of Plastic Saddles Lost to the Marine Environment

## Investigation details

<b>Activity</b>	Minerva Decommissioning and Field Management
<b>Titleholder</b>	Woodside Energy (Victoria) Pty Ltd (Woodside)
<b>Date investigation commenced</b>	3 November 2025
<b>Lead Investigator</b>	[REDACTED]
<b>Investigation team</b>	[REDACTED]
<b>Investigation number</b>	IVT14417

## Report distribution

Position	Company
Records management	National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA)
Titleholder	Woodside Energy (Victoria) Pty Ltd

## Revision status

Rev	Date	Description	Prepared by	Approved by
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B	10/12/2025	Draft for discussion with duty holders	[REDACTED] [REDACTED]	[REDACTED]
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## Background

On 6 October 2025, Eastern Maar Aboriginal Corporation (EMAC) submitted a complaint to NOPSEMA regarding Woodside's management of the release of plastic saddles and associated materials from the Minerva decommissioning activity into Eastern Maar Sea Country.

Following a review of findings, conclusions and information collated through previous investigations relating to the Minerva decommissioning activity, NOPSEMA initiated a Level 2 investigation into the complaint (IVT14417) on 3 November 2025. The investigation was conducted onshore and is based on two meetings and verbal statements with relevant Woodside representatives in the Woodside Perth office on 12 and 13 November 2025.

## Investigation scope

NOPSEMA initiated investigation IVT14417 to determine:

- the background of lost saddle recovery campaigns to date, including the lost buoyancy float from the Minerva plug and abandonment (P&A) activity
- whether there are control measures in place for the management of, and recovery of already lost saddles
- compliance with ongoing consultation requirements with relevant persons as per the activity environment plan (EP).

## Conclusions

<p><b>1.</b></p>	<p><b>Background of recovery campaigns to date</b></p> <p><i>Conclusion: NOPSEMA Inspectors conclude that saddle recovery campaigns were undertaken until 18 July 2025 and included the collection of both Minerva decommissioning-generated, and unrelated plastic debris.</i></p> <p><b>Reasons for conclusion</b></p> <ul style="list-style-type: none"> <li>• Woodside and Scaada performed recovery campaigns from 11 April–18 July 2025.</li> <li>• Woodside ceased recovery campaigns on 18 July 2025 based on no saddle pieces recovered from the 26 June–15 July 2025.</li> <li>• Woodside stated that a total of ~36 kg of saddle pieces (164 components) was recovered by Woodside, Scaada, Beach Patrol and the public, and an additional ~700 kg of debris not associated with Minerva decommissioning activities was collected during the Woodside and Scaada recovery campaigns.</li> </ul>
<p><b>2.</b></p>	<p><b>Background of recovery campaigns to date</b></p> <p><i>Conclusion: NOPSEMA Inspectors conclude that a verification process was not in place to ensure sighted/reported Minerva decommissioning debris was recovered.</i></p> <p><b>Reasons for conclusion</b></p> <ul style="list-style-type: none"> <li>• A gravity base anchor (GBA) buoyancy float was lost on 21 March 2025 during Minerva P&amp;A activities.</li> <li>• The GBA buoyancy float was located by Woodside on Shelly Beach on 24 April 2025, however, was not recovered at the time due its weight (~50–55 kg).</li> <li>• Woodside instructed the P&amp;A waste contractor to recover the GBA buoyancy float, however it was not collected.</li> <li>• The GBA buoyancy float recovery was not verified by Woodside.</li> <li>• A member of the public subsequently recovered the GBA buoyancy float on 21 September 2025.</li> </ul>
<p><b>3.</b></p>	<p><b>Control measures in place for the management of, and recovery of already lost saddles</b></p> <p><i>Conclusion: NOPSEMA Inspectors conclude that dedicated campaigns to recover lost saddles have ceased. Woodside has a control measure in place to collect reported debris from the Minerva decommissioning activity, however it is unclear whether it has been, or is effective.</i></p>

	<p><b>Reasons for conclusion</b></p> <ul style="list-style-type: none"> <li>• Woodside stated that relevant persons were sent an Activity Information Sheet (AIS) [8] which provided instructions to report sightings of plastic material to Woodside: <i>'If you see any thick plastic material on beaches in the vicinity, contact us with the location details so we can collect it.'</i></li> <li>• Post-cessation of recovery campaigns, Woodside's recovery of lost saddles is reliant on external reporting of debris (e.g. through the AIS instruction).</li> <li>• The AIS was not sent to all relevant persons.</li> <li>• It is unclear whether all relevant persons are aware of the reporting instruction.</li> <li>• Reports of loss saddles have only been received from one member of the general public and Beach Patrol.</li> </ul>
<p><b>4.</b></p>	<p><b>Compliance with ongoing consultation requirements</b></p> <p><b>Conclusion:</b> <i>NOPSEMA Inspectors conclude that ongoing consultation has been undertaken compliant with commitments in the EP.</i></p> <p><b>Reasons for conclusion</b></p> <ul style="list-style-type: none"> <li>• There is a means for relevant persons to provide feedback to and communicate with Woodside.</li> <li>• There is evidence of feedback and comments received from relevant persons which continue to be addressed and responded to.</li> </ul>

NOPSEMA expects the titleholder(s) to consider these findings and conclusions and undertake sufficient action of their own to both fully understand the issues presented and to take action to reduce the risks and impacts to as low as reasonably practicable (ALARP) and acceptable levels.

## Inspectors' recommendations

The investigation team recommends that NOPSEMA:

- close the investigation.

The investigation team recommend that Woodside:

- Implement a robust process to verify that any reported debris from the Minerva decommissioning activities is collected, quantified and disposed of appropriately.
- Provide clear written guidance to all relevant persons on how they can report sightings of Minerva decommissioning material to Woodside, so that it can be monitored, collected and disposed of.

## Summary of findings

### Background recovery campaigns to date

#### Plastic saddles and associated debris

- Woodside estimates that 87 kg of plastic saddle-related debris (160 saddle components) was lost to the marine environment in Commonwealth waters during Minerva decommissioning activities (99 kg and 269 pieces in State waters) [3].
- Woodside conducted coastal surveys to search for and recover saddles and debris on 10–11 April 2025 and 23–25 April 2025.
- Woodside contracted Scaada to undertake coastal surveys to search for and recover saddle components and associated debris. Scaada campaigns took place on business days for 11 weeks from 12 May 2025 to 18 July 2025.
- The spatial extent of Woodside and Scaada recovery campaigns was stated as being from Portland to Wilson Promontory, and GPS used to track the distances searched.
- Scaada was instructed to recover all debris found, and not only that from Minerva decommissioning, as long as it was safe to do so.
- Locations for Scaada campaigns were informed by hydrodynamic drift modelling undertaken by a specialist consultancy engaged by Woodside to predict the transport and fate of lost saddles.
- Woodside stated that Scaada subcontracted individuals from Beach Patrol from 2 June 2025 to 18 July 2025 to inform and support search and recovery of lost saddles.
- Woodside stated that a total of ~36 kg of saddle pieces (164 components) has been recovered by Woodside, Scaada, Beach Patrol and the public, with the majority (133) being the smaller 'C' component.

- Woodside stated that there has been ~90–100 pieces of blue twine recovered.
- Woodside estimates that ~700 kg of debris not associated with Minerva decommissioning activities has been removed from beaches surveyed by Woodside and Scaada.
- Saddles and waste collected is disposed of through Woodside's Minerva decommissioning disposal contractor, Ausdecom.
- On 15 July 2025, Woodside recommended that Scaada cease the recovery campaigns due to no saddles pieces being recovered in the 26 June–15 July 2025 period, generally deteriorating weather conditions, and the disproportionate effort/risk of personnel movements around the coast and beaches given the diminishing returns on materials recovered. The final Scaada campaign day was 18 July 2025.
- Woodside advised that Scaada recovered one saddle component on 16 July 2025 and three saddle components on 17 July 2025. No components were observed or recovered on the final day of the Scaada campaign, 18 July 2025.
- Woodside confirmed that there were areas not searched due to:
  - no access
  - lack of safe access
  - restricted access (e.g. private property, traditional owner land).
- Woodside estimates that ~11.4 kg of saddles pieces (45 components) and associated material has been recovered by the public between 23 February 2025 and 17 October 2025. Woodside advised that the estimate is primarily based on a calculation of saddle component weights from Beach Patrol Facebook posts.
- Woodside stated that Beach Patrol confirmed that all debris collected by their teams is logged online through the Beach Patrol Facebook page [7].
- Woodside estimates that ~2.4 kg of plastic saddles has been recovered by Beach Patrol since ceasing the Scaada campaigns on 18 July 2025. Saddles were recovered on 5 separate days between 26 July 2025 and 17 October 2025, with no reported findings since 17 October 2025 (to the date of investigation meeting, 12 November 2025).

### **GBA buoyancy float**

- As reported to NOPSEMA on 15 April 2025, a GBA buoyancy float was lost to the marine environment during Minerva P&A activities on 21 March 2025 [4]. Woodside confirmed the subsequent timeline relating to the incident to be:

- 24 April 2025: The lost float was located at Shelly Beach during initial Woodside coastal surveys [5]. Woodside stated that the float could not be recovered by personnel at the time due to the float weight being ~50–55 kg.
- 28 April 2025: Woodside instructed the P&A waste contractor, Qube, to recover the float.
- 16 July 2025: Woodside followed up with the waste contractor to confirm that the float was recovered, however the contractor was uncertain if recovery occurred.
- Post 16 July 2025: Woodside advised that the focal point responsible for coordinating float recovery ceased employment with Woodside.
- 13 September 2025: Beach Patrol located the float.
- 15 September 2025: Beach Patrol emailed Woodside advising they had located the float.
- 21 September 2025: Beach Patrol member recovered the float.
- Inspectors sighted correspondence whereby Woodside offered to collect the recovered float from Beach Patrol for potential reuse, however the individual in possession of the float stated they want to keep it for display in the Warrnambool Beachcomber Museum.

### Control measures in place for the management of, and recovery of already lost saddles

- The Minerva decommissioning activity is suspended and will not recommence until a revised Minerva decommissioning EP is accepted
- Scaada recovery campaigns ceased on 18 July 2025.
- Woodside advised that they do not have a documented procedure in place for the management of, and recovery of saddles, nor formal criteria for re-initiating beach recovery efforts. Woodside stated that if there was a significant increase in saddle components reported, they would consider re-initiating recovery efforts.
- Woodside indicated that they monitor for the occurrence of saddles and associated materials through engagement with local councils, surf lifesaving clubs, local communities, online posts e.g. Beach Patrol Facebook as described above.
- Woodside stated that on the 14 May 2025, they sent a Minerva decommissioning update to relevant persons via issue of an AIS [8]. The AIS includes a brief description of the incident and provides instructions to relevant persons to report sightings of plastic material to Woodside: *'If you see any thick plastic material on beaches in the vicinity, contact us with the location details so we can collect it.'*

- Woodside stated that they rely on the reporting of saddles, for which, as per the AIS, they would either recover at the location they are reported sighted at or collect them from those who have collected them, via courier services or their disposal contractor.
- Inspectors verified that the AIS was sent to relevant persons on the 14 May 2025, however it was found that it was not sent to all relevant persons [9].
- Woodside confirmed that the AIS was not sent to EMAC, however Woodside stated that an overview was provided verbally and during their meeting on the 21 May 2025. Woodside believes that they presented the AIS during this meeting.
- Woodside advised that they have received reports from one person (general public) and Beach Patrol of lost saddles.

### Compliance with ongoing consultation requirements

- Woodside maintains a register of correspondence with relevant persons that includes information such as date of correspondence, communication type, summary, stakeholder name, etc. [6]
- Inspectors sighted a sample of consultation records between Woodside and EMAC, and Woodside and Beach Patrol to determine whether ongoing consultation is being undertaken as required by the EP.

### EMAC

- Woodside notified EMAC of the loss of saddles from the decommissioning of the Minerva field on 9 May 2025 and held a meeting with EMAC on the 21 May 2025 in Warrnambool, Victoria.
- Inspectors observed ~17 separate communications between Woodside and EMAC from 9 May 2025 to 13 November 2025. Woodside appeared to have provided a response to each piece of communication that they had received from EMAC.
- Emails sighted were consistent with content in the EMAC complaint letter timeline (9 May–21 July 2025).
- There were no records of communications regarding the plastic saddle incident after 21 July 2025 [6].
- Inspectors sighted two communications dated 17 and 27 October 2025 between Woodside and EMAC with regards to consultation on the revised Minerva Decommissioning EP.
- Woodside stated that there have been no objections or claims regarding the loss of plastic saddles raised by EMAC and there have been no saddles reported found by EMAC to date.

### Beach Patrol

- Inspectors observed ~67 separate communications between Woodside and Beach Patrol from 8 May 2025 to 13 November 2025. Woodside appeared to have provided a response to each piece of communication that they had received from Beach Patrol.
- Inspectors sighted emails between Woodside and Beach Patrol relating to a grievance logged in ‘boreal’. Woodside raised the grievance due to the non-recovery of the GBA buoyancy float. Inspectors observed that emails regarding timing and activities aligned with the float findings described above and demonstrated that there is a means for relevant persons to provide feedback to Woodside and that the feedback is responded to. Inspectors did not observe any other grievances related to the Minerva decommissioning or Minerva P&A activities.

### Abbreviations

AIS	Activity information sheet
ALARP	As low as reasonably practicable
EMAC	Eastern Maar Aboriginal Corporation
EP	Environment plan
GBA	Gravity base anchor
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
OPGGGS Act	<i>Offshore Petroleum and Greenhouse Gas Storage Act 2006</i>
P&A	Plug and abandonment

## Appendix A: Document register and information register

The following documents and information were sighted or reviewed during investigation IVT14417:

Reference	Document
[1]	Meeting: Woodside and NOPSEMA at Woodside office, 1300–1540 on 12 November 2025 for the purpose of investigation IVT14417 information gathering. Attendees: Woodside – [REDACTED] (online), [REDACTED] [REDACTED] NOPSEMA – [REDACTED]
[2]	Meeting: Woodside and NOPSEMA at Woodside office, 0930–1220 on 13 November 2025 for the purpose of investigation IVT14417 information gathering. Attendees: Woodside – [REDACTED] [REDACTED] (online). NOPSEMA – [REDACTED]
[3]	Lost saddle register WC 9 May 2025
[4]	Minerva plug and Abandonment Environment Plan: Woodside Energy Monthly Recordable Environment Incident Notification for March 2025 – submitted 15 April 2025
[5]	Presentation: Woodside Energy Minerva Coastline Survey – 23 <sup>rd</sup> April to 25 <sup>th</sup> April 2025
[6]	Sighted Excel register: Minerva Field and Decom EP Stakeholder Engagement Records
[7]	Sighted: EP meeting notes 28 October 2025 (Woodside and Beach Patrol)
[8]	Activity Information Sheet - May 2025: Minerva Decommissioning Update, Otway Basin, South East Australia.
[9]	Minerva Decommissioning and Field Management Activity Update (SM-00315) smart email.