

## General Direction – s 574

*Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth)*

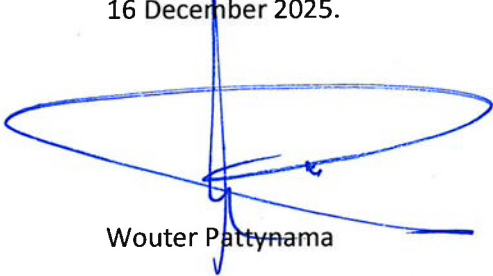
Direction No: 2100

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To INPEX Ichthys PTY LTD:

### **Issue of Direction/s - section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006***

I, Wouter Pattynama, Acting Deputy Chief Executive Officer of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), make this instrument under section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act) pursuant to the Instrument of delegation dated 16 December 2025.



Wouter Pattynama

**Acting Deputy CEO - Regulatory Operations**

07 July 2026

### **1. Commencement**

This Direction takes effect on the date of signature.

### **2. Application**

This Direction applies to INPEX Ichthys PTY LTD, ABN 46 150 217 253 the registered holder of production licence WA-50-L.

### **3. Direction**

1. The registered holder of production licence WA-50-L, INPEX Ichthys PTY LTD, is given the directions contained in Schedule 1.
2. Each Direction in Schedule 1 is a separate direction.

## Schedule 1

### ***Direction 1***

1. The registered holder must have an independent, suitably qualified technical specialist undertake an activity-wide assessment of mercury management and submit a report, that:
  - a. Quantifies and evaluates all mercury emissions, discharges and exports associated with the Activity, including:
    - i. an assessment of the environmental fate and consequences of the released mercury, and
    - ii. identifies the operating conditions and emission sources, including atmospheric emissions, that contribute to those releases.
  - b. Identifies and clearly describes all inconsistencies between current operations, including controls, and the arrangements described in, and relied upon by, the accepted Environment Plan, including the nature and extent of those inconsistencies.

The selection of independent technical specialist and the associated terms of reference must be completed and provided to NOPSEMA within 45 days from the date this direction is signed, with the assessment completed within 120 days following the date of written correspondence from NOPSEMA of the acceptance of the technical specialist and terms of reference, unless otherwise agreed with NOPSEMA.

### ***Direction 2***

1. The registered holder must, within 60 days following written confirmation by NOPSEMA of the completion of Direction 1, unless otherwise agreed by NOPSEMA, submit a Mercury Management Plan that:
  - a. Defines the mercury management controls to be implemented, including measures to eliminate or minimise emissions, in order to reduce impacts and risks to ALARP.
  - b. Specifies the actions to be taken to address all inconsistencies identified under Direction 1(b), including any required reinstatement, modification or replacement of arrangements described in the accepted Environment Plan.
  - c. Includes an ongoing monitoring program sufficient to support verification and an ongoing assessment of the effectiveness of the management approach; and
  - d. Demonstrates integration with the Liquid Effluent Management Plan and Management of Change process.

### ***Direction 3***

1. The registered holder must, within 60 days (unless otherwise agreed with NOPSEMA) following written confirmation by NOPSEMA of the completion of Direction 2, implement the Mercury Management Plan.
2. The registered holder must, within 90 days (unless otherwise agreed with NOPSEMA) following the implementation of the Mercury Management Plan, required under Direction 3(1), provide NOPSEMA with evidence of:
  - a. Implementation of the identified controls;

- b. A review of the effectiveness of the mercury management arrangements;
- c. Identification of any further mercury treatment and management changes, required to continue to reduce impacts and risks to ALARP; and
- d. Completion of updates to relevant procedures (including the Mercury Management Plan, Liquid Effluent Management Plan and Management of Change process), where necessary.

#### ***Direction 4***

1. This General Direction must be displayed at a prominent position at the CPF (Ichthys Explorer) and FPSO (Ichthys Venturer) facilities.

### **Explanatory Statement**

INPEX is undertaking an Activity in a manner that is inconsistent with the assumptions, controls, and implementation arrangements described in the accepted Environment Plan (EP). In particular, critical systems and processes relied upon in the EP to manage hazardous substances and associated emissions and discharges are not being implemented, or are operating outside of the conditions described and assessed in the EP.

NOPSEMA inspection 4920 identified that ongoing bypasses and altered operation of mercury management system components have materially changed the emissions and discharge profile of the facility from that described in the EP. INPEX has identified these operating conditions as contributing factors in the mercury sulphide incident (Notification 13998). INPEX has implemented operational changes in response to the incident, which have not been adequately characterised, quantified, or validated through monitoring or analysis. As a result, there is increased uncertainty regarding the environmental impacts and risks associated with the Activity.

NOPSEMA also identified that key EP implementation processes, including the Management of Change (MOC) and Liquid Effluent Management Plan (LEMP), are not being appropriately implemented in circumstances where changes to facility configuration and operating arrangements have occurred.

On this basis NOPSEMA considers there is insufficient assurance that the Activity, as currently configured and operated, is being effectively managed in accordance with the environmental performance outcomes, controls, and implementation framework described in the accepted EP. Accordingly, NOPSEMA considers it necessary to issue this General Direction.

## Notes

Pursuant to s 575 of the Act, as the direction(s) above apply to:

- a) a registered holder; and
- b) a person referred to in paragraph 574(3)(b);

**the registered holder must** cause a copy of the notice by which the Direction was given to be displayed at a prominent position at a place in the offshore area.

### ***Breach of a direction***

Under sub section 576(1) of the Act, if a person is subject to a General Direction under section 574 and the person engages in conduct that breaches that direction, the person commits an offence:

**Fault-based offence** – 5 years imprisonment or 2,000 penalty units, or both (10,000 penalty units for a body corporate).

**Strict liability offence** – 100 penalty units (500 penalty units for a body corporate).

**Civil penalty provision** – 525 penalty units (2,625 penalty units for a body corporate).

**Continuing offences** – a person who commits a fault-based or strict liability offence commits a separate offence in respect for each day during which the offence continues. The maximum penalty for each day that the offence continues is 10% of the maximum penalty that can be imposed in respect to that offence.

**Continuing contraventions of civil penalty provisions** – a person who contravenes the civil penalty provision commits a separate contravention in respect for each day during which the contravention continues. The maximum civil penalty for each day that the contravention continues is 10% of the maximum civil penalty that can be imposed in respect to that contravention.