

# Annual Environmental Performance Reporting

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## 1. Purpose

The purpose of this guideline is to support the preparation of satisfactory and consistent Environmental Performance Reports (EPR) for an activity, as required under Regulation 51(1) of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023 (Cth) (Environment Regulations).

### **Part 5 - Incidents, reports and records**

#### **Regulation 51 - Reporting environmental performance**

- (1) A titleholder undertaking an activity under the title must submit a report to NOPSEMA in relation to the titleholder's environmental performance for the activity, at the times or intervals provided for in the environment plan in force for the activity.

*Note: Subsection 22(7) requires an environment plan to state when the titleholder will submit reports.*

*Note: If NOPSEMA is not reasonably satisfied after 2 or more requests for a modified report, NOPSEMA may withdraw acceptance of the environment plan (see paragraph 43(1)(d)).*

This guideline should be used by titleholders to prepare their EPRs and sets out NOPSEMA's preferred format, and the required content, of EPRs.

*Note: NOPSEMA is currently developing Project CORE, which will deliver a web-based system to facilitate online submissions and notifications. This includes the development of a new external-facing platform that will provide titleholders with a collaborative, efficient and seamless regulatory experience. CORE is expected to go live in late 2026. The recommended EPR structure, format and contents, as outlined within this document, will be reflected within CORE. Therefore, adoption of this guideline during the preparation of EPRs prior to the release of CORE will likely facilitate a smoother transition to the new platform.*

## 2. Environmental Performance Report (EPR) Requirements

### 2.1. Records relating to environmental performance

Regulation 52 of the Environment Regulations requires a titleholder to store records on environmental performance, emissions and discharges, the calibration and maintenance of monitoring devices, as well as written reports (including monitoring, audit and review reports) concerning environmental performance and the implementation strategy under an in-force Environment Plan (EP).

These records and reports, among other things, may provide the information required by NOPSEMA to monitor the titleholder's environmental performance. This information will typically relate directly to specific measurement criteria, as identified in the EP, and be linked to the Environmental Performance Outcomes (EPO) and Environmental Performance Standards (EPS). Further, some measures included in the Implementation Strategy section of the EP may also need to be reported, where they relate to environmental performance.

Reference to specific records, reports, forms, certificates and other documentary evidence should be included in the environmental performance section of the EPR. The referenced material should be available to NOPSEMA during subsequent inspections. Regulation 53 specifies the requirements for a titleholder to make these records available to NOPSEMA.

Where performance monitoring generates large data sets – for example, emissions and discharges – summary data showing totals and trends may be sufficient for the EPR.

### 2.2. Submission of EPRs

As noted in Section 2, Regulation 51 requires a titleholder to submit a report to NOPSEMA, in relation to the titleholder's environmental performance for the activity, at the times or intervals provided for in the environment plan in force for the activity.

Regulation 22 (7) requires the EP to state when the titleholder will issue these reports to NOPSEMA, and prescribes that the interval between reports must not be more than 12 months.

It is NOPSEMA's expectation that EPRs will be issued to NOPSEMA annually, from the date of EP acceptance. In the case where all activities under the EP have been completed, and Regulation 54 end of activity notification(s) have been submitted, the last EPR could be submitted prior to the annual 'due date'.

The last EPR of a multiyear activity is expected to be a standard EPR (i.e. not a summation of all activities completed in previous years).

### 3. Recommended EPR Structure, Format and Content

To clearly and accurately present the compliance status of the activity, the following EPR structure is recommended:

1. Introduction
2. Summary of the activity
3. Environmental Performance
4. Emissions and discharges
5. Environmental Monitoring
6. Reportable and Recordable Incidents
7. Management of Change

Each of these elements is expanded below.

#### 3.1. Introduction

This section should clearly identify:

- name, revision and date of the EP under which the activity was accepted
- details of titleholder and liaison person
- person accepting responsibility for the report
- dates for the reporting period of the report
- date of preparation of the report.

#### 3.2. Summary of the Activity

This section should include information relevant to environmental performance associated with Regulations 17, 18, 19, 54 and 55 of the Environment Regulations.

##### 3.2.1. Summary of activities

This section should include a summary of the activities commenced, ongoing and/or completed during the reporting period, including planned and unplanned activities, and any changes in the activity. This should include relevant dates/timeframes, a summary of production/operations (as relevant) along with similar data from previous reporting periods (if applicable) to convey the progress and stage of the activity.

NOPSEMA recommends this be presented in a table format, summarising the main works/operations for the reporting period, with supporting text, tables or graphs as required. An example summary of activities table is provided in Table 1.

**Table 1 - Example summary of activities undertaken during the reporting period**

Activity	Stage (if applicable)	Status	Timing	Comments
Construction vessel mobilised to the permit area to support the pigging of the gas export pipeline	NA	Completed	10 January to 10 February 2025	Pigging of the gas export pipeline completed. Relevant notifications provided.
Completion of Well 01	Pre-commissioning	Completed	January 2025	Wellbore cleanup, well flowback and well suspension
FPSO temporary shut down and disconnection	NA	Completed	22 February to 27 February 2025	Due to Tropical Cyclone
Crude export lift	NA	Completed	2 March 2025	200,000 bbls
Environmental monitoring (sediment quality)	NA	Completed	5-8 April 2025	Sampling completed at 12 sites.
Anchor pre-lay	Installation	Completed	10 January to 22 January 2025	Anchors in place 1 month prior to MODU arrival.
Seismic acquisition commenced	NA	Ongoing	12 January 2024 to 22 February 2024	Three vessels were used during the survey: <ul style="list-style-type: none"> <li>Investigator - seismic vessel;</li> <li>Naturaliste - chase vessel;</li> <li>Viking Prince - support vessel</li> </ul>

### 3.2.2. Start and end of activity

The provision of the information requested above does not affect the titleholder's separate obligations under Regulation 54 to provide notice to NOPSEMA of the start and end of an activity.

#### Part 6 - Miscellaneous

##### Regulation 54 - Notifying start and end of activity

- (1) A titleholder must give NOPSEMA written notice that an activity under the title is to commence at least 10 days before the activity commences.
- (2) A titleholder must give NOPSEMA written notice that an activity under the title has ended no later than 10 days after the activity ends.

### 3.2.3. Decommissioning

If the EP relates to a final life-cycle activity (i.e. a decommissioning execution or end-state activity), then the titleholder should report on how requirements under s.572 of the OPPGS Act have been met during the reporting period, for all property no longer in use. Refer to *Section 572 Maintenance and removal of property Policy* ([N-00500-PL1903](#)) for more information on property removal requirements.

This may include providing an account of all property removed from the title during the reporting period, providing information on key maintenance activities conducted on property, or identifying if any accepted alternative end states have been reached (for example, where some property is being left in-situ).

The information provided should address all property identified in the register (inventory) presented in the decommissioning phase EP. In the event an accepted end state could not be reached (for example, if property removal was unsuccessful) this must be reported, with a demonstration that management of change has been implemented (see Section 4.7, Management of Change).

In the case of the last EPR prior to surrender of title, the EPR should report on performance against relevant conditions and obligations, to allow NOPSEMA to provide advice to the Joint Authority in relation to the criteria set out in s.270(3) of the OPPGS Act.

Refer to *Section 270 Consent to surrender title - NOPSEMA advice* ([N-00500-PL-PL1959](#)), for more information on the type of information required to address the criteria.

## 3.3. Environmental Performance

### 3.3.1. Environmental Performance Outcomes and Environmental Performance Standards

The EPR should clearly identify whether the EPOs and EPSs as identified in the EP have been met.

This information should be provided as a table, identifying each EPO and EPS, whether they have been met, and the evidence that supports the conclusion. An example table is provided in Table 3.

Titleholders are expected to refer to specific measurement criteria to determine how each environmental performance outcome (EPO) and environmental performance standard (EPS) is being met (as required under Regulation 21(7)). This will be used, among other things, to evaluate the environmental performance status of the activity. The evidence should be consistent with the relevant measurement criteria identified in the EP.

Table 3 - Example summary of compliance against EPOs and EPSs

EPO ID	EPO	EPO Status <sup>1</sup>	EPS ID	EPS	EPS Status	Measurement Criteria	Evidence used to support compliance status including information source
1	No injury of, or mortality to, EPBC Act listed marine fauna as a result of the activity	Met	1.1	Vessels will not travel greater than 6 knots when within 300 m of a turtle	Met	Marine assurance records	Incident reports Fauna observation Register / MFO reports Vessel logs
2	No impact to the environment outside of the mixing zone from planned discharge of produced water	Not applicable	2.1	Limit average PW OIW during routine operations to < 30 mg/L (over a 24 hr rolling average).	Met	OIW records demonstrate daily OIW < 30 mg/L	Records of OIW concentration in PW discharge
3	Net GHG emissions shall achieve GHG reductions under reformed Safeguard Mechanism (inclusive of legislated net zero emissions by 2050)	Met	3.1	Manage net direct and indirect GHG emissions from the Facility to within the accepted baseline, under the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015.	Met	Records demonstrate emissions remained below baseline	Monthly GHG emissions records
4	All discharges to the marine environment of SBM drill cuttings will be ≤7% wt/wt oil on cuttings	Met	4.1	Sampling of drill cuttings prior to discharge to ensure no disposal if ≤7% wt/wt oil (per SBM section)	Met	Drill cutting testing records	Daily Drilling Fluid Report records daily oil on cutting (OOC) results and well section averages.

<sup>1</sup> The following designations must be used to record the compliance status:

**Met:** Designates when the EPO or EPS has been fully met.

**Not Met:** Designates when the EPO or EPS has not been fully met.

**Not applicable:** A designation of 'not applicable' must be given where the scope of the activities during the reporting period was not relevant to the EPO or EPS. For example, where the EPO or EPS relates to a stage of the activity which was not commenced during the reporting period.

EPO ID	EPO	EPO Status <sup>2</sup>	EPS ID	EPS	EPS Status	Measurement Criteria	Evidence used to support compliance status including information source
	<i>(averaged over the SBM sections).</i>						
5	No release of hydrocarbons to the marine environment due to well loss of containment	Met	5.1	Maintain well mechanical integrity to contain reservoir fluids within the well envelope	Met	Records demonstrate controls maintained and effective	Records of control implementation Incident reports
			5.2	An accepted WOMP is implemented, and well integrity notification and reporting are undertaken in accordance with the Regulations (as applicable).	Met	Records demonstrate NOPSEMA acceptance of WOMP, records demonstrate notifications and reporting completed in accordance with Regulations	NOPSEMA acceptance of WOMP Notification and reporting records
6	No release of hydrocarbons to the marine environment due to a vessel collision	Met	6.1	No entry of unauthorised vessels within the 500 m SEZ.	Not Met	Daily operations reports and Incident records demonstrate no	Daily operations reports Incident reports

<sup>2</sup> The following designations must be used to record the compliance status:

**Met:** Designates when the EPO or EPS has been fully met.

**Not Met:** Designates when the EPO or EPS has not been fully met.

**Not applicable:** A designation of 'not applicable' must be given where the scope of the activities during the reporting period was not relevant to the EPO or EPS. For example, where the EPO or EPS relates to a stage of the activity which was not commenced during the reporting period.



EPO ID	EPO	EPO Status <sup>3</sup>	EPS ID	EPS	EPS Status	Measurement Criteria	Evidence used to support compliance status including information source
	<i>associated with the activity</i>					<i>breaches of SEZ by unauthorised vessels</i>	

<sup>3</sup> The following designations must be used to record the compliance status:

**Met:** Designates when the EPO or EPS has been fully met.

**Not Met:** Designates when the EPO or EPS has not been fully met.

**Not applicable:** A designation of 'not applicable' must be given where the scope of the activities during the reporting period was not relevant to the EPO or EPS. For example, where the EPO or EPS relates to a stage of the activity which was not commenced during the reporting period.

### 3.3.2. Implementation strategy

#### *Execution of Implementation Strategy*

This section of the EPR should demonstrate that the implementation strategy has been executed in accordance with the EP and the requirements of Regulation 22.

This includes demonstration that ongoing consultation has been undertaken for the activity, to confirm compliance with the commitments made in the EP in relation to Regulation 22(15).

#### *Impacts and risks reduced to ALARP*

This section of the EPR should discuss the specific measures used to ensure that environmental impacts and risks of the activity continue to be identified and reduced to a level that is as low as reasonably practicable (ALARP), including an evaluation of whether control measures continue to be effective (Regulation 22(1)). Depending on the nature of the activity, this evaluation of control measures might be achieved through an annual review, or more frequent offshore environmental monitoring.

#### *Audits, Inspections and Testing*

This section of the EPR should summarise all titleholder regulatory audits, regulatory inspections and oil spill response testing completed during the reporting period, to inform NOPSEMA's assessment of the compliance of the activity with Regulation 18 (aspects considered in EP acceptance criteria under Regulation 34(b)(c)(e)), including:

- date(s), topic(s) and key outcomes
- identified non-compliances
- a statement of compliance (i.e. whether audits, inspections and tests were completed in accordance with the in-force EP).

*Note: A tabular format for the above audit, inspection, consultation and testing information is preferred.*

### 3.4. Emissions and Discharges

This section should include a review and quantitative record of all emissions and discharges associated with the activity (e.g. produced water, drill cuttings, flared gas, non-routine waste streams) during the reporting period. This should include:

- a comparison between the emissions and discharges in the reporting period against the limits contained in the EP (and any relevant corporate targets where these are identified in the EP)
- a comparison between the emissions and discharges in the reporting period and the results from previous years (where the works/operations are ongoing)
- material removed from a title as a non-routine waste stream during decommissioning activities.

The review should also refer to the strategies described in the EP for continuously reducing the impacts of emissions and discharges to ALARP, and whether those strategies were effective during the reporting period.

This section should include a table documenting the emissions and discharges during the reporting period with supporting text, tables or graphs as required. The types of emissions and discharges, and the relevant reporting parameters (e.g. units, concentration, volume, discharge method etc.), should align to those described in the in-force EP. An example table is provided in Table 4.

**Table 4 - Example summary of emissions and discharges**

Emission / Discharge	Parameter	Planned / Unplanned	Units	Total Volume	Comments
Atmospheric emissions	Total Greenhouse Gases	Planned	tCO <sub>2</sub> -e/ annum	300,000	Compliant with annual limit set in EP
Atmospheric emissions	Diesel and fuel gas usage	Planned	t/annum t/Kt	40,000	Above annual limit set in EP (35,000)
Atmospheric emissions	Fuel gas intensity	Planned	t/Kt	80	Within EP target (of 50)
Atmospheric emissions	Flaring	Planned	MMscf	60	Within EP limit
Liquid discharges	Produced Formation Water	Planned	kL/annum	100,000	Compliant with annual limit set in EP (of 80,000)
Liquid discharges	Produced Formation Water	Unplanned	kL/annum	50,000	Discharge during shutdown of boiler. Total PFW discharge above EP limit (of 45,000).
Marine discharge	Drill fluids	Planned	m <sup>3</sup>	4000	Within EP limit per well
Marine discharge	Drill cuttings	Planned	m <sup>3</sup>	700	Within EP limit per well
Non-routine waste	Contaminated sludge (separator clean-out)	Planned	m <sup>3</sup>	55	Waste removed to onshore licenced facility.
Material removed from title during decommissioning activities	Scrap steel (from Wellhead)	Planned	t	7.5	Material cleaned and taken to onshore recycling facility.

Where emissions and discharges have already been reported at the petroleum-activity level under other government reporting schemes (e.g. greenhouse gas emissions under the National Greenhouse and Energy Reporting (NGER) Scheme, a summary (aligned to the emissions and discharges as described/quantified in the EP) should be included within the EPR, to support NOPSEMA's assessment of compliance of the activity.

### 3.5. Environmental Monitoring

Regulations 22(5) and 22(6) require the implementation strategy to include measures to ensure that the EPOs and EPSs in the EP are being met.

The EPR should summarise any environmental monitoring or research, as identified in the EP, that occurred during the reporting period. Each summary should include the methodology used and a summary of results, as well as any follow-up investigations undertaken where anomalies are identified.

Where the EPR relates to a final life-cycle activity (i.e. a decommissioning execution or end-state activity), the summary of environmental monitoring or research should enable NOPSEMA to evaluate the criteria set out in s.270(3) of the OPGGS Act. This may include, for example, results from as-left surveys or benthic sediment and water quality surveys.

### 3.6. Reportable and Recordable Incidents

#### 3.6.1. Reportable Incidents

Regulations 47, 48 and 49 describe the required notifications and reporting associated with a reportable incident. In addition to these requirements, the EPR should include a summary of all reportable incidents in the form of a table (such as the example provided in Table 5) and an assessment of performance in relation to statutory notifications and reporting timeframes.

*Table 5 - Example summary of reportable incidents*

Notification Number and Date*	Incident Date*	Incident Category*	Incident details*	Action taken avoid or mitigate environmental impacts*	Actions taken, or proposed, to prevent a similar incident*
NTF-101	1/4/2025	Hydrocarbon release	Loss of <1,000 L of oil due to offloading hose rupture	Offloading operations ceased. Sorbent booms deployed	Replacement of hose and update of inspection schedule

*Note: \*consistent with information required in 'Report of an Accident Dangerous Occurrence Well Integrity or Environmental Incident Form' (including part 1D).*

#### 3.6.2. Recordable Incidents

Regulation 50 describes the required reporting associated with a recordable incident. In addition to these requirements, the EPR should include a summary of all recordable incidents in the form of a table (such as the example provided in Table 6).

**Table 6 - Example summary of recordable incidents**

Incident ID	Incident Date	Description of Incident	EPO / EPS Breached	Action(s) taken in Response	Actions to Prevent Reoccurrence	Status Update
1	15/6/2025	An estimated <20L of marine gas oil (MGO) was released to the marine environment.	EPO 1: Zero unplanned discharge of hydrocarbons or chemicals to the marine environment	The spill was stopped, a tracker buoy was deployed and ocean water samples taken.	Design controls to be reviewed and improved to prevent similar incident.	Changes to design controls completed.
2	20/8/2025	Plastic wrap from spools of rope, that had become brittle from sun/heat exposure, blown off in the wind and into the marine environment.	EPO 13: No release of solid hazardous or non-hazardous waste to the marine environment	Immediately removed and/or covered degraded plastic to prevent any further shredding.	Plastic wrapping will be removed from equipment stored on the top deck and replaced by suitable non-degrading cover material.	Processes updated to require removal of plastic wrapping from spools on arrival at facility. Tethered tarpaulin used to cover stored spools.

The incidents listed in this section should be consistent with the information provided in the 'Environmental Performance' section of the EPR.

Where an incident has occurred that did not meet the intent of an EPO or an EPS it is recommended that such an incident also be included in this section and in the 'Environmental Performance' section of the EPR.

### 3.7. Management of Change

The Environment Regulations (Regulations 38, 39, 40 and 41) identify situations under which a revision of the EP is required, for assessment and acceptance by NOPSEMA. For situations which do not trigger this requirement, the titleholder may follow their Management of Change (MoC) process to assess and 'endorse' changes to the EP. It is the titleholder's responsibility to ensure that the impacts and risks of the activity continue to be identified and reduced to a level that is ALARP, and that the control measures continue to be effective. Titleholders should also monitor and manage changes to external factors such as changes to legislation, conservation advice and best available science.

This section informs NOPSEMA's assessment of the compliance of the activity with Regulation 39(1)(2). As such, the EPR should provide a summary of the changes made to the EP, through the MoC process, during the reporting period.

## 4. Further Information

This guideline should be read in conjunction with NOPSEMA's:

- Monthly Environmental Incident Reports Form ([N-03300-FM0928](#))
- Notification, Reporting and Recording Requirements for Incidents Guidance note ([N-03300-GN2303](#))
- End of operation of an environment plan – Regulation 46 Guideline ([N-04750-GL1691](#))
- Report of an Accident, Dangerous Occurrence, Well Integrity or Environmental Incident Form (A159980)
- Regulation 54 - Start or end of an activity Form ([N-04750-FM1405](#) [A417042](#))
- Regulation 46 - End of operation of environment plan Form ([N-04750-FM1408](#) [A346625](#))
- Section 270 Consent to surrender title - NOPSEMA advice ([N-00500-PL-PL1959](#))
- Section 572 Maintenance and removal of property Policy ([N-00500-PL1903](#)).

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