

## OHS Improvement Notice

*Offshore Petroleum and Greenhouse Gas Storage Act 2006, Schedule 3 clauses 78, 78A and 78B*

**Notice No:** 2091

**Date:** 26/03/2026

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To: Beach Energy (Operations) Limited (ACN: 007 845 338)

In conducting an OHS inspection in relation to the Thylacine-A Platform facility I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act), am satisfied on reasonable grounds that;

Beach Energy (Operations) Limited has contravened a provision of a listed OHS law and is likely to contravene that provision again

AND

As a result, there is, or may be, a risk to the health or safety of a person at the Thylacine-A Platform facility.

The relevant listed OHS law that I am satisfied on reasonable grounds has been contravened and is likely to be contravened again is Schedule 3, Clause 9(2)(c) of the OPGGS Act.

The reasons for my opinion are:

During inspection #5245, I observed the following in relation to the pedestal crane on the Thylacine-A Platform facility (the Crane):

1. there is a backlog of 73 corrective maintenance orders, with one item raised in 2017. A backlog of 73 unresolved defects (some dating back to 2017) means known issues that affect the Crane's reliability have not been addressed. This increases the likelihood of mechanical or structural failure during lifting operations;
2. there is a non-compliance to the Management of Work Procedure (Doc ID 6378878, Rev 2, dated 4 June 2021), where the majority of corrective maintenance orders in the Computerised Maintenance Management System (CMMS) have no assigned work priority and does not specify whether the maintenance activity is safety-critical. Without prioritisation, safety-critical issues may not be addressed promptly. This allows hazardous defects to remain unmitigated, increasing operational risk;
3. safety devices were observed as not functional or with impaired functionality. The luff down limit switch was observed to be bent and no longer functional. The Robway load indicator display panel was observed to be dim, which limits visual detection of overload events. Loss of these safety functions directly increases the risk of boom collapse, dropped loads, or uncontrolled crane movement. As it was a sampled inspection, there may also be other safety devices not sampled that may also be not functional or have impaired functionality;

4. the Crane cabin was observed to be in poor condition and top window was obscured. The Crane operators are required to operate the controls in an ergonomically compromised and unsafe manner;
5. the last annual inspection of the Crane was carried out in December 2025 by a third-party crane inspector and the Crane signed off as fit for service until the next annual inspection. However, the inspector's American Petroleum Institute Recommended Practice 2D (API RP 2D) qualified offshore crane inspector certification was out of date (lapsed July 2025). Beach Energy (Operations) Limited's contractor competency verification process failed to identify this issue. Because the API RP 2D certification was expired, the inspection cannot be relied upon as a valid assurance that the Crane is safe;
6. an internal audit was performed in June 2025. The audit found that there was a corrective maintenance backlog in relation to the issues identified for the Crane. However, limited action has been taken to address the corrective maintenance backlog since the audit finding was classified as an observation only. Once hazards are known, failing to correct them means reasonably practicable steps to maintain safety have not been taken.

These deficiencies show the Crane has not been maintained in a condition that ensures it is safe, and key safety controls have been compromised. As a result of these observations, I am satisfied on reasonable grounds that Beach Energy (Operations) Limited has not taken all reasonably practicable steps to ensure that any plant or equipment at the facility is safe and without risk to health.

As a result of this contravention, I am satisfied that there is, or may be, the following risk to the health or safety of any person: during lifting operations using the Crane there is a risk of dropped objects, structural failure or loss of control resulting in a death or serious injury.

I am satisfied that Beach Energy (Operations) is likely to contravene schedule 3, clause 9(2)(c) of the Act again because Beach Energy (Operations) was aware of the maintenance backlog, which includes safety devices, from the internal audit conducted in June 2025 and had taken limited action to rectify the backlog.

I am satisfied on reasonable grounds that the following actions must be taken by the responsible person to reduce or prevent the risk:

1. Rectify the existing corrective maintenance orders in the CMMS for the Crane and assign work priority level, maintenance activity type and start / end completion dates in compliance with the Management of Work Procedure and accepted safety case.
2. Take measures to ensure that the corrective maintenance order backlog has been assigned priority levels and criticality, and the works planned, scoped and scheduled, to ensure the risk to the health and safety of personnel during lifting operations, is reduced to a level that is ALARP.
3. Ensure that all safety-related devices on the Crane, including the luff-down limit switch and the Robway load-indicator system, which were observed as not functional / impaired functionality, are restored to full functionality in accordance with API RP 2D and OEM requirements, and verify that all other safety devices are also compliant.
4. Take measures to ensure that the Crane is fit for service with an annual inspection report prepared by a qualified crane inspector that confirms the crane meets API RP 2D requirements.

5. Update Beach's internal audit process to ensure any identified corrective maintenance backlogs for safety critical equipment have an associated corrective action generated.
6. Update Beach's contractor management processes which failed to identify the third-party crane inspector was no longer certified as qualified and demonstrate to NOPSEMA how the identified gap will be closed.

You are required to take action to reduce or prevent the risk within 360 days from the date of this notice.

██████████  
**NOPSEMA INSPECTOR**  
██████████

26 March 2026

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When the required action(s) has been completed, the Responsible Person is to submit this part of the notice to the following person via:

Post: Level 10, 58 Mounts Bay Road  
Perth WA 6000

Email: [submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au)

Name: [REDACTED]

Position: **NOPSEMA INSPECTOR**

Contact number: [REDACTED]

By signing below, I confirm on behalf of Beach Energy (Operations) Limited that the specified action described in Improvement Notice No. 2091 has been undertaken within the period specified.

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

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

(to be signed by responsible person only when the notice has been complied with)

## Notes

1. Under clause 78A of Schedule 3 to the Act, a responsible person who fails to ensure that this notice is complied with, to the extent that it relates to any matter over which the responsible person has control:
  - a. commits an offence and may be liable to a penalty of 300 penalty units for the offence; or
  - b. contravenes a civil penalty provision and may be liable to a civil penalty of 400 penalty units.
2. For every day proceeding the initial offence or contravention the notice is not complied with, the responsible person commits an offence or contravention in respect of each day (including a day of a conviction under this clause or any later day) during which the offence or contravention continues.
3. A copy of this notice must be displayed in a prominent place at or near each workplace which work affected by the notice is being performed. It is an offence to tamper with or remove it until the notice has ceased to have effect.
4. The recipient of this notice must ensure that all relevant requirements for giving copies of the notice to certain persons and representatives are complied with in accordance with cl 78b to Schedule 3 to the Act.
5. Under clause 80A of Schedule 3 to the Act, any of the following persons may request the reviewing authority in writing to review the NOPSEMA inspector's decision:
  - the operator of the facility;
  - the titleholder, if the notice is issued to a titleholder;
  - any person to whom an improvement notice has been issued;
  - an employer, if affected by the decision;
  - a relevant health and safety representative; a relevant workforce representative, if requested by a member of the workforce affected by the decision;
  - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.