Acceptance of the East Coast Supply Project Offshore Project Proposal

Document No: A1202342

Date: Friday, 25 July 2025

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1. On Monday, 7 July 2025 I, Sue McCarrey, as the Chief Executive Officer (**CEO**) of the National Offshore Petroleum Safety and Environmental Management Authority (**NOPSEMA**), decided, pursuant to s 13(1)(a) of *the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023* (**Environment Regulations**), to accept the East Coast Supply Project Offshore Project Proposal (Document No: VOB-EN-EMP-0005, Revision 5, dated Friday 27 June 2025) (**OPP**), as I was reasonably satisfied that the OPP met the criteria in s 13(4) of the Environment Regulations.
2. The decision to accept an OPP for the purposes of s 13 of the Environment Regulations is made by NOPSEMA. Pursuant to sub-s 666(2) of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (**OPGGS Act**), anything done by the CEO in the name of NOPSEMA is taken to have been done by NOPSEMA.
3. The OPP was submitted by Cooper Energy (CH) Pty Ltd and Cooper Energy (MGP) Pty Ltd (the **proponent**) to enable the proponent to undertake the offshore project described in the OPP, which involves the production of petroleum resources in the Otway Basin, in offshore waters off Victoria. The petroleum activities that are part of the offshore project include site surveys, well construction, installation and commissioning, operations, decommissioning of infrastructure, and associated support operations. The offshore project ties into existing offshore petroleum infrastructure, which is operated by the proponent, to supply the Australian east coast domestic gas market via the Athena Gas Plant.
4. In this Statement of Reasons:
   a. When I refer to NOPSEMA having made a request, I am referring to a request made by me.
   b. When I refer to NOPSEMA having considered or having had regard to a matter, whether it be expressed in those words or similar phrasing, I am referring to a matter that I have considered or taken into account; and
   c. When I refer to NOPSEMA making a finding of fact or accepting a submission, I am referring to a finding made by me.
5. In making this decision, I have taken into account and accepted advice and recommendations from the assessment team within NOPSEMA. The assessment team comprised a Director, a Lead Assessor, and a team of Environment Specialists.

6. The assessment team scoped the assessment of the OPP in accordance with NOPSEMA's assessment policy and guidance material. The assessment scope consisted of:
   a. a general assessment of the OPP
   b. topic scope assessments comprising:
      i. matters protected under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**), and
      ii. emissions and discharges (planned), with a focus on greenhouse gas emissions and discharges to the sea during drilling and construction activities.
7. All references to a section are to the Environment Regulations unless otherwise stated.

Background

8. On Friday, 5 July 2024, the proponent submitted the OPP to NOPSEMA in accordance with s 6 of the Environment Regulations.
9. I requested the proponent provide further written information under s 8(1) of the Environment Regulations on Monday, 5 August 2024. The proponent revised the OPP in response to this request and resubmitted the OPP on Monday, 7 October 2024.
10. I requested the proponent provide further written information under s 8(1) of the Environment Regulations on Tuesday, 5 November 2024. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 6 December 2024.
11. On Friday, 3 January 2025, I decided that:
    a. the OPP was suitable for publication because I was reasonably satisfied it met the criteria in sub-s 9(4) of the Environment Regulation; and
    b. a 49 day (seven week) public comment period was appropriate given the nature and scale of the offshore project.
12. On Monday, 6 January 2025 the public comment period commenced.
13. On Monday, 24 February 2025 the public comment period concluded.
14. On Thursday, 13 March 2025 the proponent revised and resubmitted the OPP following the public comment period in accordance with s 11 of the Environment Regulations.
15. I requested the proponent provide further written information under s 12(1) of the Environment Regulations on Friday, 11 April 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 30 May 2025.
16. I requested the proponent provide further written information under s 12(1) of the Environment Regulations on Friday, 20 June 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 27 June 2025.

17. I noted a small number of editorial matters that I requested the proponent resolve (i.e., correct a figure label and cross reference and remove highlights from a paragraph of text) on Friday, 4 July 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 4 July 2025.

Materials

18. The materials considered in making this decision are set out in **Appendix A** and are referenced, where relevant, in the reasons below.

Criteria for Acceptance of the Offshore Project Proposal

19. As the proponent had resubmitted the OPP under s 11 of the Environment Regulations, in order to accept the OPP, I had to be reasonably satisfied that the criteria in s 13(4) were met. I address each of the acceptance criteria below.

The OPP Adequately Addresses Comments Given During the Public Comment Period: section 13(4)(a)

20. No comments were received over the seven-week public comment period. In the absence of any public comments on the Proposal, I was satisfied that the acceptance criteria 13(4)(a) was met.

The OPP is Appropriate for the Nature and Scale of the Project: section 13(4)(b)

21. I was reasonably satisfied that the OPP meets the requirements of subsection 13(4)(b) and was appropriate for the nature and scale of the offshore project for the reasons set out below.

22. I found that the OPP described an appropriately clear and logical process for identifying the various key characteristics and activities of the project, particularly those that have the potential to impact the environment. This is because:

    a. Section 4 of the OPP clearly described the activities that are part of the project, including the spatial and temporal extent of those activities.

    b. Sections 6 of the OPP provided a suitably detailed description of the environment that may be affected by the aspects of the activities that are part of the project.

    c. Section 7 of the OPP clearly and logically described an appropriate process by which the OPP evaluated environmental impacts and risks, which aligns with recognised environmental impact and risk management standards (e.g., AS/NZS ISO 31000:2018).

    d. Section 7 of the OPP described an appropriate environmental risk management process which was consistently applied to the planned impacts and unplanned risks that may credibly arise because of the project.

    e. Sections 8, 9, 10, and 11 of the OPP appropriately identified the environmental aspects of these activities and described the pathways by which the aspects may cause an environmental impact.

23. I found Section 4 of the OPP contained an adequate description of the offshore project and defined its scope and bounds. The description provided a sound basis for the proponent to evaluate all environmental impacts and risks, including the potential for cumulative impacts. This is because the OPP provided details on the petroleum activities, including their location, spatial extent, timing, and duration. Key activities that are part of the offshore project include:

    a. Geophysical and geotechnical site surveys of the proposed locations for wells and offshore project infrastructure.

    b. Well construction including mobile offshore drilling unit (**MODU)** positioning, drilling operations, installation of blowout preventers, cementing, installation of subsea trees, well completions, clean-up and flowback, well suspension and logging.

        i. It is noted that the OPP described the process by which exploration wells may be completed and suspended prior to future tie in and production. Petroleum activities conducted on an exploration and appraisal basis do not require an accepted OPP to be in place prior to submitting an Environment Plan (**EP**) to NOPSEMA.

        ii. The OPP notes the intention for successful discoveries to be developed as soon as practicable after discovery pending approval of an Installation and Commissioning Environment Plan and amendment of the Operations Environment Plan to account for the associated production.

        iii. The OPP includes a clear commitment to permanently plug and abandon wells with no intended future use in accordance with NOPSEMA's *Decommissioning Compliance Strategy 2024-2029*.

    c. Installation, testing, and pre- and post-commissioning of subsea infrastructure including flowline and umbilical control systems.

    d. Operation activities including hydrocarbon extraction, inspection, maintenance and repair.

    e. Decommissioning of wells and subsea infrastructure.

    f. Support activities including the operation of MODUs, vessels, remotely operated vehicles (ROVs), and helicopters.

24. I found the OPP appropriately bound activities for which there is uncertainty by clearly defining the operational area and requiring all petroleum activities that are part of the offshore project to be undertaken within the operational area.

25. I found the OPP appropriately identified uncertainty in some details of the project's activities which were not resolved at the time of this decision, such as the exact locations of wells and subsea infrastructure. I found this uncertainty could not be resolved at the time of the submission of the OPP to NOPSEMA, as their nature and scale depend on preceding offshore project activities, such as number and location of pre-lay and post-lay works, exact location of infrastructure, and exact discharge volumes and locations.

26. Where aspects of the offshore project and the activities that are part of the offshore project are uncertain, I found that assumptions made in the face of uncertainty, such as concurrent construction, installation and operation activities, were appropriate and supported with adequate reasoning.

27. I found the OPP appropriately described a clear and logical process for identifying environmental aspects of the petroleum activities that are part of the project. The environmental aspects of these activities are described in the evaluations of planned impacts (Section 8 of the OPP) and unplanned risks (Section 9 of the OPP) in appropriate detail. The descriptions of oil spill-related risks, subsea noise and greenhouse gas emissions are informed and supported by a series of technical reports which were appended to the OPP.

28. I found the OPP appropriately applied a clear and logical process for identifying and describing relevant values and sensitivities of the environment that may be affected by the offshore project and provides a description of the environment that is adequate to inform the evaluation of impacts and risks. For example, the OPP:

    a. Utilised the EPBC Act protected matters search tool (PMST) reports that identify matters of national environmental significance and other matters protected by the EPBC Act in the operational area and the ecological and monitoring environments that might be affected (**EMBA**s), respectively.

    b. Utilised an environmental survey report covering benthic epifauna and infauna as well as marine mammal observations (Appendix 1 of the OPP).

    c. Utilised published scientific literature as well as the published findings from environmental surveys conducted by third parties in adjacent areas to add to the understanding of the existing environment.

    d. Utilised modelling studies to predict the spatial extent of the environment that may be affected by underwater noise emissions, light emissions and hydrocarbon spills, respectively, using appropriate thresholds to estimate the nature and scale of these impacts.

29. I noted the planning area used to define the description of environment in the OPP (Section 6) is appropriately based on stochastic hydrocarbon spill modelling and deterministic analysis utilising NOPSEMA's contemporary modelling thresholds (Section 9 and Appendix 3 of the OPP).

30. I found the description of the environment that may be affected by the offshore project included adequate supporting information to inform the evaluations of environmental impacts and risks, with greater detail provided on environmental sensitivities most likely to be impacted or at risk due to the project, including descriptions of:

    a. The regional setting which included an overview of the South-east Marine Region, the Otway Marine Bioregion, the Shipwreck Coast Biogeographical Unit, and the Temperate-east Marine Region.

    b. The physical characteristics of the environment, such as air quality, bathymetry, climate, winds, oceanography, water quality, sediment quality, ambient light, and underwater noise.

c. Biological communities (benthic assemblages), coastal habitats, species (including invertebrates, fish, marine reptiles, seabirds and shorebirds, and marine mammals).

d. Commonwealth and state protected areas.

e. Socio-economic features such as coastal settlements, commercial fisheries, shipping, petroleum exploration and production, defence, recreation and tourism, and other offshore infrastructure (renewable energy and subsea cables).

f. Cultural features and heritage values.

31. I found that Sections 6, of the OPP appropriately described relevant values and sensitivities of the environment listed under Part 3 of the EPBC Act that may be affected by the project, including:

    a. Species listed as threatened or migratory under the EPBC Act, including biologically important areas and habitats critical to survival, and those covered by conservation plans.

    b. Threatened ecological communities – none of which occur in the operational area, but 13 of which are located along the coastline and in the nearshore waters within the monitoring EMBA.

    c. Relevant values of the Commonwealth marine area including water quality, sediment quality, benthic assemblages, and sensitive seabed features.

    d. The four National Heritage Areas which are outside of the operational area but within the monitoring EMBA.

    e. The seven Ramsar wetlands of international importance, which are located in coastal areas within the monitoring EMBA, but outside of the operational area.

32. The OPP notes that no World Heritage Places are located within the operational area or monitoring EMBA, however, the Tasmanian Wilderness was briefly described as it is the closest World Heritage Area to the monitoring EMBA.

33. I found the operational area does not overlap any Australian Marine Parks.

34. The OPP notes seven Key Ecological Features (KEFs) are present within the monitoring EMBA. However, only one of these, the shelf rocky reefs and hard substrates KEF may be overlapped by the operational area or EMBA. This KEF is not spatially defined other than being described in relevant scientific literature as located in all areas of the south-east marine region.

35. I found that the OPP appropriately identified and described the feasible alternatives to the offshore project and the activities that are part of the offshore project. In this regard, the OPP:

    a. Described the qualitative comparative assessment approach used to compare both project-level and activity-level project alternatives (Section 5.1 of the OPP).

    b. Outlined the factors considered by the proponent in their decision-making, including technical feasibility and economic aspects in addition to the focus on environmental aspects.

c. Identified the environmental criteria relevant to each stage of the development concept, before ranking each evaluated concept qualitatively in relation to all other options, with rankings accompanied by a rationale for the rank given.

d. Gave due consideration to the impacts and risks of each option, with a focus on the offshore project design elements that have the greatest potential for avoiding or substantially reducing impacts (such as underwater noise and marine discharges).

e. Consistently applied this methodology at a level of detail that is commensurate with the level of development planning undertaken to date.

The OPP Appropriately Identifies and Evaluates the Environmental Impacts and Risks of the Activities that are Part of the Project: section 13(4)(c)

36. I was reasonably satisfied that the OPP meets the requirements of sub-s 13(4)(c) and appropriately identifies and evaluates the environmental impacts and risks of the activities that are part of the offshore project for the reasons set out below.

37. I found the OPP appropriately applied a clear and logical process for defining the acceptable level of environmental impact and risk. The OPP did this by:

a. Describing the process by which environmental impacts and risks are demonstrated to be acceptable (Section 7 of the OPP), which includes consideration of:

i. The principles of ecologically sustainable development (Section 7.2.4.2 of the OPP).

ii. Legislative and other requirements such as Commonwealth policies and guidelines, international agreements and conventions, and industry standards.

iii. The proponent's internal context including the Cooper Energy Risk Management Protocol and Cooper Energy Management System.

iv. External context including feedback from stakeholders.

b. Defining and providing the basis for acceptable levels of impact and risk of the activities for the offshore project, including the rationale for why they are considered appropriate in the context of the offshore project and the receiving environment (Section 7.3 of the OPP).

c. Applying the process described in Section 7 of the OPP to the evaluations of impacts and risks (Sections 8, 9, 10 and 11 of the OPP).

d. Demonstrating that the environmental performance outcomes (EPOs) will achieve a level of impact or risk that is equal to or less than the acceptable levels of impacts or risks (Sections 8, 9, and 10 of the OPP).

38. I found the OPP appropriately defines acceptable levels of impact and risk which have a clear basis in the analysis of relevant facts and evidence (Section 7.4.2 of the OPP), because the defined acceptable levels of impact and risk:

a. Considered relevant principles of ecologically sustainable development (ESD).

b. Were relevant to the physical, biodiversity, cultural and social features of the environment that may be affected by the project.

c. Were consistent with the legislative and other requirements that apply to the offshore project including the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC, 2000),* the *EPBC Regulations 2000 – Part 8 Division 8.1 interacting with cetaceans,* and the *National Light Pollution Guidelines for Wildlife (DCCEEW, 2023k).*

d. Were evaluated in a manner informed by relevant environmental literature with clear explanation of why the conclusions were reached.

39. I found that the OPP appropriately applies an evidence-based evaluation process to demonstrate that the offshore project can be managed such that the environmental impacts and risks will be acceptable because the OPP included:

a. Outcomes and conclusions of the impact and risk evaluation supported with logical, clear and well-founded evidence and reasons.

b. A comparison of the predicted environmental impacts of the offshore project and the activities that are part of the offshore project with the defined acceptable levels.

c. An assessment of the potential cumulative impacts of the offshore project with other activities.

d. References to appropriate information, such as scientific studies and technical appendices to the OPP, that informed and supported the evaluations of environmental impacts and risks.

40. I found the OPP acknowledged and accounted for uncertainty associated with predicted environmental impacts of the offshore project and identified both likelihood and consequence metrics for all risks to the environment associated with unplanned events. The OPP identified and accounted for uncertainty, commensurate with the degree of predictive uncertainty, intensity, severity and duration of impacts and the environmental value of the receptors that may be affected. Examples of where the OPP identified and evaluated uncertainty in regard to impact and risk in the OPP include:

a. The detailed description of the offshore project where, for example, the exact location of infrastructure or discharge volumes are not yet known, the OPP provides sufficient detail to identify and describe the potential environmental impacts and risks and the basis for these evaluations. This includes sufficient information to identify higher order impacts and risks with respect to sensitive receptors, such as marine fauna protected under Part 3 of the EPBC Act, biologically important areas, and sensitive marine habitats.

b. The offshore project schedule and timing, which assumes that well construction, installation, commissioning, and operations phases could all occur concurrently, and evaluates impacts under such worst-case foreseeable scenarios. A suitably detailed description of key values and receptors, including seasonal sensitivities, is included to support the evaluation.

c. The likely future status of wells drilled will vary from suspending and converting to production to plugging and abandoning depending on well viability. All scenarios are described with clear pathways and timeframes for appropriate decommissioning in each case.

d. The presence of underwater cultural heritage, where a commitment is made to conduct further surveys prior to commencement of well construction activities to inform any required management should such materials be located.

e. The scale of GHG emissions and the effects of climate change, where the OPP considers appropriate recent scientific literature to evaluate impacts and refers to adaptive mechanisms to respond to changes in the scientific certainty. In addition, the OPP addresses uncertainty in relation to potential changes to Australia's approach to managing greenhouse gas emissions by committing to working with governments and stakeholders in the design of climate change regulation and policies and re-engaging with the Clean Energy Regulator regarding potential changes to the application of safeguard thresholds.

41. Detailed topic assessments conducted by subject matter experts from the assessment team, included in relation to the following higher order environmental impacts and risks:

a. Potential environmental impacts and risks to the Commonwealth marine area resulting from drilling and operational discharges.

b. Potential environmental impacts and risks to threatened and migratory species listed under Part 3 of the EPBC Act, with a focus on those impacts and risks arising from arising from anthropogenic underwater noise.

c. Potential environmental impacts and risks to threatened and migratory seabirds and shorebirds listed under Part 3 of the EPBC Act, with a focus on those impacts and risks arising from project related artificial light emissions.

d. Potential environmental impacts and risks arising from project related greenhouse gas emissions and their effect on climate change.

42. I considered the level of detail included in the OPP to be appropriately scaled to the nature of the impacts and risks. A greater level of detail is included in the OPP on the environment that may be affected by planned operations within the operational area compared with the broader environment that may be exposed to low levels of hydrocarbon (in the unlikely event of a worst-case hydrocarbon release). Specifically, the OPP includes:

a. a logical process that is applied to identify and describe the matters protected under Part 3 of the EPBC Act that may be present within the operational area and EMBA. The OPP utilised relevant information to adequately inform and support the descriptions, such as information available on the Department of Climate Change, Energy, Environment and Water (**DCCEEW**) website such as threat abatement plans, threatened species recovery plans, conservation management plans and marine bioregional plans (Section 6 of the OPP).

b. a description of the key physical, biological, social, economic, and cultural features, values and sensitivities of the environment of the Commonwealth marine area. In particular, the OPP appropriately identifies and describes the key physical, biological, social, economic, and cultural features, values and sensitives of the environment that overlap with the operational area and EMBA. I considered that the OPP utilised relevant references and information sources to adequately inform and support the descriptions as well as the evaluation of impacts and risks, such as contemporary peer-reviewed scientific literature and other authoritative sources (Sections 6, 8 and 9 of the OPP, respectively).

c. in relation to planned discharges:

   i. The OPP contains a thorough identification and evaluation of potential impacts and risks to the Commonwealth marine area from planned drilling and operational discharges from the offshore project that is supported by scientific literature and technical studies and:

      A. Considers all credible impact and risk pathways to components of the Commonwealth marine area including impacts to sediment quality, water quality and benthic habitats and communities.

      B. Has been informed by relevant and contemporary peer reviewed scientific literature and appropriate predictive modelling studies.

      C. Recognises uncertainty in the offshore project design at the early stage of development by considering impacts across the operational area and EMBA, with commitments to undertake further studies as uncertainty is resolved as part of the detailed design phase.

d. in relation to acoustic emissions:

   i. The OPP appropriately identifies and describes the listed threatened and migratory whale species that may occur within and in the vicinity of the operational area in sufficient detail such that the description provides a sound basis for impact evaluation because it refers to sources such as PMST reports, relevant and contemporary peer reviewed scientific literature and results of marine mammal observations undertaken by the proponent.

   ii. The OPP provides a comprehensive description of the spatial areas (e.g., biologically important areas and habitat critical to survival of a species) and temporal periods where these species are expected to undertake biologically important behaviours (e.g., migration, foraging, breeding and resting).

   iii. The OPP is comprehensive in its identification and description of the sources of underwater sound emissions associated with the offshore project and activities that are part of the offshore project (including expected operating frequencies and source levels for both impulsive and continuous, non-impulsive noise sources). Furthermore, the proponent used a suitably qualified subject matter expert, with reference to relevant and contemporary peer reviewed scientific literature, to make predictions of the distance

from underwater sound generating activities at which sound effect thresholds for listed threatened and migratory whales may be exceeded.

iv. I considered the legislative requirements identified and described in the OPP to be sufficiently comprehensive and relevant to the environmental management of impacts and risks to listed threatened and migratory whales arising from anthropogenic underwater noise. This included conservation objectives and actions associated with the threat of noise interference in EPBC Act recovery plans and conservation advice for the listed threatened and migratory whales that may occur within and in the vicinity of the operational area.

v. The OPP includes an appropriate evaluation of the potential impacts associated with acoustic emissions to threatened and migratory whale species, drawing on project-specific modelling studies (Section 8 and Appendix 4 of the OPP).

e. in relation to artificial light emissions:

i. The OPP appropriately identifies and provides a comprehensive description of the listed threatened and migratory species of marine seabirds, shorebirds that may occur within and in the vicinity of the operational area and the environment that may be affected by artificial light emissions for vessel and flaring light sources, including the spatial areas (e.g. biologically important areas) and temporal periods where these species are expected to undertake biologically important behaviours (e.g. nesting, fledgeling, foraging and migration). The proponent makes appropriate use of protected matters search tool reports and relevant and contemporary peer reviewed scientific literature in preparing this description.

ii. The OPP identifies and provides an appropriate description of the sources of artificial light emissions associated with the offshore project. The document appropriately addresses those emissions that have the potential to expose listed threatened and migratory bird species to levels of light exceeding biologically relevant thresholds. The thresholds were clearly defined in the OPP by a suitably qualified subject matter expert with reference to relevant and contemporary peer reviewed scientific literature.

iii. the OPP appropriately identifies and describes the legislative requirements that are relevant to the environmental management of light emissions impacts and risks to listed threatened and migratory bird species. This includes the conservation objectives and actions associated with the threat of light pollution in the Recovery Plans for Albatross and Petrels, and Orange Bellied Parrot, respectively, as well as Conservation Plans for Seabirds and Migratory Shore Birds. The OPP also draws on the National Light Pollution Guidelines for Wildlife in describing potential impacts and risks and defining control measures to mitigate impacts and risks from artificial light emissions to threatened and migratory seabirds and shorebirds.

iv. The OPP includes an appropriate evaluation of the potential impacts associated with light emissions to light sensitive receptors, including seabirds and shorebirds (Section 8 of the

OPP), because it draws on modelling studies to predict the area of impact (EMBA) and considers impact pathways identified in relevant statutory documents (such as recovery plans) and relevant aspects of the *National Light Pollution Guidelines for Wildlife* as well as modelling and impact studies conducted in adjacent marine areas.

f. in relation to greenhouse gas emissions:

i. In assessing the OPP, my evaluation of the greenhouse gas emissions of the project had regard to section 527E of the EPBC Act and the related Policy Statement '*Indirect consequences of an action: Section 527E of the EPBC Act*'. Bearing the Policy Statement in mind, I found that the downstream scope 3 greenhouse gas emissions from the transport and end use of the petroleum produced by the project are likely to be an indirect consequence, and hence are an indirect impact, of the project. Accordingly, the downstream scope 3 greenhouse gas emissions must be described and evaluated in the OPP. I found the OPP provides a suitable description and evaluation of these emissions in Section 8.5 of the OPP.

ii. The OPP appropriately identifies sources of greenhouse gas emissions for the different stages of the project and provides a thorough description, including downstream scope 3 greenhouse gas emissions from the use of the hydrocarbon produced by the project.

iii. The OPP appropriately describes activities that generate greenhouse gas emissions during each of the offshore project stages and provides estimates of all greenhouse emissions that may arise from the offshore project using appropriate emissions quantification methods, including for forecast sales gas and condensate production for the Athena onshore gas plant.

iv. The OPP provides a thorough description of the key international arrangements, Australian legislative framework, and the company strategy and actions relevant to greenhouse gas emissions reduction. For example, the OPP outlines:

A. The Paris Agreement, which Australia has ratified.

B. The Safeguard Mechanism, which it is noted, may apply to the East Coast Supply Project for some years.

C. The National Greenhouse and Energy Reporting (**NGER**) Scheme.

D. The proponent's internal requirements, such as the Climate Action policy (summarised in Section 8.5.5 of the OPP), supported by several risk management processes (described in Section 7 of the OPP).

v. The OPP includes an evaluation of the impacts and risks to the environment in Australia associated with the whole of project greenhouse gas emissions, supported by information drawn from relevant published literature cited in the OPP. The evaluation considers existing and potential future climate change-related impacts to the physical environment, terrestrial and marine ecosystems, and socio-economic values.

43. I found the OPP appropriately considers World Heritage, National Heritage and Ramsar wetland values and the evaluation demonstrates that the environmental impacts of the offshore project would not contravene a plan of management for a World Heritage property; a plan of management for a National Heritage place; or a plan of management for a Ramsar wetland.

The OPP Demonstrates that the Environmental Impacts and Risks will be Managed to an Acceptable Level: section 13(4)(d)

44. I was reasonably satisfied that the OPP meets the requirements of subsection 13(4)(d) and demonstrates that the environmental impacts and risks of the offshore project will be managed to an acceptable level for the reasons set out below.

45. I found that the OPP includes a 'demonstration of acceptability' as a part of the evaluation of each environmental impact (Sections 8 and 10 of the OPP) and risk (Sections 9 and 10 of the OPP), respectively. Each demonstration:

    a. Appropriately evaluates the predicted environmental impacts and risks for each environmental aspect of the offshore project and activities that are parts of the project. (Refer to paragraphs 38 and 39 for reasons why the respective impacts and risks were appropriately identified and evaluated.)

    b. Effectively compares the predicted impacts and risks to the relevant defined acceptable levels in Sections 8, 9 and 10 of the OPP and demonstrates that the predicted levels are equal to, or less than, the defined acceptable levels.

    c. Consistently applies the process set out in Section 7 of the OPP for each environmental impact and risk evaluation. (Refer to paragraphs 38 and 39, herein, for reasons why I found this process appropriate.)

    d. Establishes EPOs for each environmental aspect which, supported by control measures, provide the adequate assurance that the environmental impacts and risks will be managed to an acceptable level.

46. My evaluation of whether the OPP appropriately demonstrated that environmental impacts and risks will be acceptable included a focus on the higher order environmental impacts and risks which are covered in detailed assessment topics listed in paragraph 42. Specifically, the OPP includes:

    a. In relation to planned discharges:

        i. The OPP defines acceptable levels of impacts and risks to the Commonwealth marine area associated with drilling and operational discharges. The OPP applied a clear and logical process to define these acceptable levels that considers relevant context provided by scientific literature and modelling studies presented in the OPP.

        ii. The OPP appropriately adopts an evidence-based evaluation process to demonstrate that potential impacts and risks to the Commonwealth marine area arising from the drilling and operational discharges will be managed to an acceptable level through the

implementation of suitable control measures. The process compares predicted impacts and risks with the defined acceptable levels and provides sufficient evidence to demonstrate that predicted impacts and risks will be restricted in spatial extent and that conditions return to baseline following cessation of planned discharges.

b. In relation to acoustic emissions:

   i. The OPP applies a clear and logical process to define acceptable levels of impact and risk from underwater sound on listed threatened and migratory whales. In doing so, the OPP draws on conservation objectives and actions outlined in relevant EPBC Act recovery plans and conservation advice for listed threatened and migratory whales.

   ii. The OPP effectively implements an evidence-based evaluation process to demonstrate that potential impacts and risks to listed threatened and migratory whales arising from underwater sound emissions will be managed to an acceptable level through the implementation of suitable control measures. Such control measures include:

      A. a commitment to implement the Cooper Energy Offshore Victoria Whale Disturbance Risk Management Process, the key features of which are identified in the OPP.

      B. A commitment to incorporate adaptive management measures into activity-specific EPs when there is greater certainty regarding timing of specific activities.

   iii. The evaluation process includes a suitably thorough comparison of predicted impacts and risks with the relevant defined acceptable levels. Sufficient evidence is provided to demonstrate a high degree of certainty that predicted impacts and risks will not be inconsistent with the relevant EPBC Act recovery plans and conservation advice.

c. In relation to artificial light emissions:

   i. The OPP defines acceptable levels of impacts and risks to seabirds and migratory shorebirds from artificial light. The OPP applies a clear and logical process to define these acceptable levels that considers conservation objectives and actions included in the Recovery Plans for Albatross and Petrels and Orange Bellied Parrot as well as Conservation Plans for Seabirds and Migratory Shore Birds.

   ii. The OPP effectively implements an evidence-based evaluation process to demonstrate that potential impacts and risks to seabirds and migratory shorebirds arising from artificial light emissions will be managed to an acceptable level through the implementation of suitable control measures. For example, the OPP includes commitments to implement:

      A. The Cooper Light Management Measures (CM4), which acknowledge legislative requirements, align with the *National Light Pollution Guidelines for Wildlife (Commonwealth of Australia 2023)*, consider sensitive life-stages for vulnerable species, incorporate planning-phase risk review, and limit MODU and vessel lighting to minimum safety and navigational requirements.

B. The Cooper Marine Assurance Program (CM1), which requires compliance with AMSA marine orders.

C. Reviews of modelling studies to inform activity-specific Environment Plans that incorporate current, published thresholds for sensitive receptors such as those documented in the *National Light Pollution Guidelines for Wildlife* (CM22).

d. In relation to greenhouse gas emissions:

i. The OPP defines the acceptable level of impact for the project's scope 1, 2, and 3 greenhouse gas emissions (see Acceptable Level number 10 (AL10) of the OPP) and demonstrates that the EPO will achieve an acceptable level of impact from such emissions. The acceptable level is aligned with Australia's commitments made under the Paris Agreement, which are implemented by the safeguard mechanism set out in the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015. The acceptable level encompasses all the project's emissions.

ii. EPO15 and the associated control measures, provide reasonable satisfaction that the project's greenhouse gas emissions will be within the acceptable level set out in AL10 because:

A. The management, monitoring, and reporting set out in CM5, CM23, and CM26 demonstrates how EPO15 will be met for the project's scope 1 and scope 2 emissions.

B. Scope 3 emissions from transportation and end use of the hydrocarbons produced by the offshore project will occur within Australia. Consequently, the offshore project's scope 3 emissions are scope 1 or scope 2 emissions for other persons within Australia; these persons' scope 1 and scope 2 emissions are required to comply with the safeguard mechanism regulated by the Clean Energy Regulator.

47. I found the cumulative environmental impact evaluation in Section 11 of the OPP demonstrated that cumulative impacts will be of an acceptable level, as:

a. The OPP included an appropriate process to identify relevant cumulative impacts. Such impacts may arise from separate activities within the offshore project (for example, well construction and flowline installation), as well as cumulative impacts from interactions between the offshore project activities and other reasonably foreseeable activities in the region.

b. The assessment reasonably considered key environmental features, spatial extents (under worst case foreseeable scenarios), temporal extents, successive impacts, additive impacts, and synergistic impacts.

c. The OPP included an appropriate evaluation of such impacts, which demonstrated that cumulative impacts fall within the defined acceptable levels for key receptors, notably cumulative noise impacts to whales and cumulative light impacts to seabirds and shorebirds. In so doing, I considered the OPP to effectively demonstrate that cumulative impacts would

not be inconsistent with conservation advice, recovery plans and threat abatement plans for EPBC Act listed threatened, migratory or cetacean species (AL11).

d. The OPP commits that the proponent will communicate work programs with other Otway Basin Petroleum Titleholders with the aim of minimising the potential for cumulative impacts (CM13) at the time of implementation.

48. I found that the EPOs for unplanned events, such as the loss of materials overboard, loss of containment of chemicals or hydrocarbons including major spills, interaction with marine fauna, and the introduction of invasive marine species, are consistently and appropriately set to prevent such outcomes from occurring. This provides a clear commitment by the proponent to prevent unplanned risks from becoming realised and I am reasonably satisfied that these EPOs represent an appropriate level of environmental performance for the project.

49. I found the OPP makes clear commitments to achieve the defined EPOs and then implement the controls associated with the outcomes. The OPP clearly links acceptable levels, EPOs and control measures for all impacts and risks. In addition, Section 12 of the OPP outlines key parts of the environmental management system that will be applied when undertaking the offshore project and activities that are part of the project. This includes key features of procedures covering control measures. While the OPP does not describe the environmental management system in detail, based on the information provided, I am reasonably satisfied that the control measures provide a means by which impacts and risks of the project can be managed to an acceptable level.

The OPP sets out Appropriate Environmental Performance Outcomes for Each Activity that are Consistent with the Principles of Ecologically Sustainable Development: section 13(4)(e)

50. I was reasonably satisfied that the OPP meets the requirements of subsection 13(4)(e) setting out appropriate EPOs for each activity that are consistent with the principles of ecologically sustainable development (ESD).

51. I found the EPOs, with the associated control measures, in the OPP:

a. were consistent with the principles of ESD

b. demonstrated that environmental impacts and risks will be appropriately managed to an acceptable level in combination with the proponent's evaluation of environmental impacts and risks.

52. An overview of how I considered the principles of ESD in assessing the EPOs is provided below:

a. The proponent's decision-making processes applied during the project planning and implementation should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations (the 'integration principle').

i. As noted earlier, I considered that the OPP appropriately identified the social, cultural, economic and ecological values that may potentially be affected by the offshore project

Furthermore, the OPP appropriately evaluated potential impacts and risks to these values and demonstrated that such impacts and risks would be managed to an acceptable level. Collectively, I considered that these processes effectively integrated long-term and short-term economic, environmental, social considerations into impact and risk evaluation and in so doing satisfied the integration principle.

ii. The OPP appropriately demonstrated that environmental impacts and risks to these socio-economic and ecological values will be of an acceptable level. For example, AL14 commits to no interference with other marine users to a greater extent than necessary for the reasonable exercise of rights and performance of duties as conferred by the proponent's petroleum titles. Furthermore, EPO23 commits to no unplanned interaction between offshore project vessels and other marine users, and EPO22 commits to implement a Fisheries Damages Protocol to provide a compensation mechanism to fishers who damage fishing equipment on East Coast Project infrastructure outside of the Petroleum Safety Zone.

b. If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle'). I found that the OPP set out appropriate EPOs for each activity that are consistent with the precautionary principle because:

i. The OPP presents an appropriate evaluation of environmental impacts and risks as well as the case for why these environmental impacts and risks will be managed to meet the relevant acceptable levels as defined in the OPP. I have considered the threat of serious or irreversible environmental damage and how the proponent has addressed uncertainty.

ii. The OPP takes an appropriately conservative approach and applies the precautionary principle in defining acceptable levels of impact and risk, and in the demonstration of acceptability for each environmental impact and risk. Such demonstration is summarised in a series of tables in Sections 8, 9 and 10 of the OPP, which specifically address the alignment of the offshore project with the principle. Hence it is clear that the precautionary principle has been considered where the project's activities may pose a threat of serious or irreversible environmental harm.

iii. The OPP takes an appropriately conservative approach in determining the nature and scale of environmental impacts and risks. For example, as part of the evaluation, the proponent commonly considers and assesses "worst case" foreseeable scenarios for matters such as project delays and operational footprint. Further, the stochastic modelling approach using worst-case credible spill scenarios resulted in a conservative risk evaluation of hydrocarbon spills.

iv. The OPP does not use lack of scientific certainty as a reason for postponing measures to prevent environmental degradation. For example, the OPP includes commitments to adaptive management through EPO20 regarding noise impacts to marine fauna and EPO11 regarding seabed surveys.

c. The present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the 'intergenerational equity principle'). I found that the OPP set out appropriate EPOs for each activity that are consistent with the intergenerational equity principle because:

   i. The OPP provided an appropriate evaluation of the potential impacts and risks that may arise from proposed offshore project activities and that this evaluation included consideration of the health, diversity and productivity of the environment, as defined in the Environment Regulations.

   ii. The OPP set out appropriate EPOs and committed to effective management measures to demonstrate that the offshore project can be undertaken to ensure intergenerational equity. For example:

      A. The OPP commits to localised and temporary changes in air quality (EPO1), water quality (EPOs 2-8), light (EPO9), and habitats (EPOs 8 and 10-14). Thus, protecting these aspects of the environment for future generations.

      B. The OPP considers the impact of climate change and, via AL10 and EPO15, commits to complying with the safeguard mechanism under the *National Greenhouse and Energy Reporting Act (2007)*. This is a key emissions reduction mechanism, and an appropriate measure, as the hydrocarbons produced by the offshore project will be entirely consumed within Australia, hence the users of the gas are also subject to Australian emissions reductions requirements.

   iii. The OPP demonstrated that serious or irreversible environmental damage would be avoided and in so doing, maintaining the health, diversity and productivity of the environment for the benefit of future generations.

d. The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making (the 'biodiversity principle'). I found that the OPP set out appropriate EPOs for each activity that are consistent with the biodiversity principle because:

   i. The OPP provided an appropriate evaluation of the potential impacts and risks to the biodiversity and ecological values of the Commonwealth marine area, including listed threatened and migratory species under the EPBC Act.

   ii. The OPP committed to EPO9, EPO16, EPO17, EPO18, EPO20, and EPO21 which would ensure impacts and risks do not compromise biological diversity and ecological integrity.

   iii. The OPP requires that impacts must not be inconsistent with conservation advice, recovery plans and threat abatement plants for EPBC Act listed threatened, migratory, or cetacean species (AL11), and establishes that vessel strike to EPBC Act listed species is unacceptable (AL13), further demonstrating the conservation of biological diversity and ecological integrity was a fundamental consideration in the proponent's decision-making.

e. Improved valuation, pricing and incentive mechanisms should be promoted (the 'valuation principle').

i. I recognised that the proponent is required to bear the costs relating to management of environmental aspects of the offshore project and its activities to ensure that environmental impacts and risks will be of an acceptable level. The proponent sets out a number of ways in which this principle will be met including:

A. Through identifying the economic, social and ecological value of the existing environment (Section 6 of the OPP), and including provisions for the proponent to bear the full cost of environmental management for the life of the offshore project to ensure environmental impacts and risks are reduced to an acceptable level. This is reflected in all impact and risk acceptability demonstrations and environmental performance evaluations, provided in Sections 8 and 9 of the OPP, for example EPO22 which requires the proponent to implement the Fisheries Damages Protocol to provide a compensation mechanism to fishers who damage equipment on the offshore project infrastructure outside of the petroleum safety zone.

B. The OPP notes that the proponent incorporates market-based mechanisms such as carbon pricing (Section 8.5 of the OPP) where applicable, sets adaptive management frameworks (such as the whale disturbance protocol Section 8.2.6) and is required to hold financial assurance under Section 571(2) of the OPGGS Act to ensure the offshore project aligns with the 'polluter pays' principle.

C. The application of the safeguard mechanism to the project's GHG emissions described in the OPP, which incentivises the proponent to reduce emissions over time, the commitment to which is captured in AL10 and supported by EPO15.

53. My assessment of the appropriateness of the EPOs presented in the OPP and their consistency with the principles of ESD included a focus on the higher order environmental impacts and risks, as detailed in paragraph 41. In this regard, I found the EPOs were appropriate for each activity as they were consistent with the principles of ESD and, in combination with proposed control measures, demonstrated that environmental impacts and risks to these higher order matters will be managed appropriately as outlined below:

a. In relation to planned discharges:

i. I found the OPP includes EPOs that are consistent with the principles ESD as set out in s 3A of the EPBC Act and that require the implementation of control measures to implement processes and procedures. These include (but are not limited to) a chemical selection process to ensure chemicals used are environmentally acceptable while also meeting technical requirements (EPO4), management of drilling discharges (EPO2), and avoidance of discharge of residual bulk materials (EPO6).

b. In relation to acoustic emissions:

i. I found the OPP includes EPOs that are consistent with the principles of ESD; for example, EPO20 establishes a modelling review to ensure that development scenarios and thresholds remain appropriate for activity-specific EPs and in so doing are consistent with the precautionary principle.

c. In relation to artificial light emissions:

i. I found the OPP includes EPOs that are consistent with the principles of ESD; for example, EPO9 requires consideration of the DCCEEW *National Light Pollution Guidelines for Wildlife*, which will be appropriate, and in so doing remain consistent with the intergenerational principle ensuring the health, diversity and productivity of the environment for future generations.

d. In relation to greenhouse gas emissions:

i. I found the OPP included EPOs that are consistent with ESD principles and legislative requirements; for example, EPO16 requires greenhouse gas emissions to be managed in a manner that is consistent with Australia's international commitments through the application of several specific control measures (CM5, CM21, CM23, CM26), and in so doing meets the integration principle by ensuring the proponent incorporates long- and short-term economic, environmental, social and equity considerations into decision making and subsequent implementation.

54. In regard to unplanned events, such as a hydrocarbon spill, I found EPOs were appropriate and consistent with the principles of ESD. That is, EPO8 requires there to be no unplanned release of chemicals or hydrocarbon to the marine environment, which is consistent with the biodiversity and intergenerational equity principles, respectively.

The OPP does not Involve an Activity, or Part of an Activity, being undertaken in a World Heritage Area: section 13(4)(f)

55. I was reasonably satisfied that the OPP meets the requirements of s 13(4)(f) because I found the petroleum activities that comprise the offshore project will not occur in whole or in part within a World Heritage Area.

Other Considerations

The Program: Protected Matters under Part 3 of the EPBC Act

56. The Program, as endorsed under s 146 of the EPBC Act, outlines the environmental management authorisation process for offshore petroleum and greenhouse gas storage activities to be administered by NOPSEMA and requires NOPSEMA to comply with Program responsibilities and commitments.

57. In implementing the Program, NOPSEMA conducts assessments of OPPs against the requirements of the Program, which includes meeting the acceptance criteria under the Environment Regulations. Specific Program commitments relating to protected matters under

Part 3 of the EPBC Act are outlined in Table 2 of the Program report and must be applied during decision making with respect to offshore projects and activities.

58. I considered protected matters under Part 3 of the EPBC Act, including listed threatened and migratory species and the Commonwealth marine area, and was reasonably satisfied that the activities described in the OPP met the requirements of the Program on the basis that:

    a. The activity will not result in unacceptable impacts to listed threatened species and is not inconsistent with relevant recovery plans and threat abatement plans for listed threatened species. For example, noting that:

        i. A biologically important area (BIA) for the pygmy blue whale (foraging) was identified as overlapping the offshore project area. In response, the OPP demonstrated that the *Conservation Management Plan for the Blue Whale 2015-2025* (Commonwealth of Australia, 2015) was appropriately considered during the evaluation of impacts in the OPP. The activity was demonstrated to not be inconsistent with this plan.

        ii. The southern right whale has habitat critical to the survival of the species defined under the *National Recovery Plan for the Southern Right Whale* (DCCEEW, 2024l) adjacent to the operational area, and within the monitoring area. The OPP demonstrated that the Recovery Plan was considered during the evaluation of impacts in the OPP and demonstrated that proposed offshore project activities were not inconsistent with this plan.

    b. Potential impacts to the Commonwealth marine area from seabed disturbance and planned discharges (such as hydrostatic test water, drilling fluids, drill cuttings, and routine discharges from vessels), are appropriately assessed in the OPP in relation to potential impacts to water quality, sediment quality, marine fauna (including potential bioaccumulation of contaminants), and KEFs.

    c. Appropriate control measures are presented in the OPP to ensure that impacts to threatened or migratory species, and to the Commonwealth marine area, will not be unacceptable.

The Program: Cumulative Environmental Impacts

59. In the context of the Program, cumulative impacts refer to the direct and indirect impacts of a number of different petroleum activity actions that may influence the natural environment or other users within a locality or region which, when considered together, have a greater impact on the offshore marine environment than each action or influence considered individually.

60. In the context of NOSPEMA's Decision Making Guidelines for offshore petroleum activities, cumulative environmental impacts are successive, additive, or synergistic impacts of collectively significant activities or projects with material impacts on the environment that have the potential to accumulate over temporal and spatial scales.

61. As outlined above in paragraph 47, I considered the potential for cumulative environmental impacts to the Commonwealth marine area as required by the Program and was reasonably satisfied that cumulative impacts will be managed to an acceptable level.

The Program: Indirect Consequences of an Action

62. Under the Program, NOPSEMA must have regard to section 527E of the EPBC Act and relevant policies, including EPBC Act Policy Statement - 'Indirect consequences' of an action: section 527E of the EPBC Act (indirect consequences policy). NOPSEMA considers the policy to determine where indirect consequences may be considered an 'impact' of an activity under s527E. This consideration is on a case-by-case basis against the circumstances of the activity in accordance with the criteria set out in the policy.

63. In assessing the OPP, I considered the requirements of section 527E and the indirect consequences policy, and in this regard, considered that the only relevant indirect consequences associated with the offshore project were Scope 3 greenhouse gas emissions.

64. For the reasons outlined in paragraph 42.f) above, I found the OPP demonstrates that scope 3 GHG emissions will not be an unacceptable impact.

Signed

Sue McCarrey

Chief Executive Officer

25 July 2025

Appendix A: Key Materials Considered in Making the Decision

65. The key materials that I considered in making this decision included, but is not limited to:

a. The OPP, comprising the proposal submitted to NOPSEMA by Cooper Energy (CH) Pty Ltd and Cooper Energy (MGP) Pty Ltd (Document Number VOB-EN-EMP-0005, Revision 5, dated Friday, 27 June 2025 and the supporting appendices.

b. The legislative framework relevant to OPP assessments:

   i. the OPGGS Act

   ii. the Environment Regulations

   iii. the Endorsed EPBC Program[1].

c. Policies and Guidelines:

   i. NOPSEMA Assessment Policy (N-04000-PL0050)

   ii. NOPSEMA Offshore Project Proposal Assessment Policy (N-04790-PL1650)

   iii. NOPSEMA Offshore Project Proposal Decision Making Guideline (N-04790-GL1816)

   iv. Department of Climate Change, Energy, Environment and Water (DCCEEW), Significant Impact Guidelines 1.1 – Matters of National Environmental Significance, EPBC Act Policy Statement (2013)

   v. Department of Sustainability, Environment, Water, Population and Communities' (DSEWPaC) 'Indirect consequences' of an action: Section 572E of the EPBC Act (2013).

d. Guidance:

   i. NOPSEMA Offshore Project Proposal Content Requirements Guidance Note (N-04790-GN1663)

   ii. NOPSEMA Oil Pollution Risk Management Guidance Note (N-04750-GN1488)

   iii. NOPSEMA Information Paper – Making Public Comment on Offshore Project Proposals (N-04790-IP1664)

   iv. NOPSEMA Decommissioning Compliance Strategy 2024 – 2029 (2024)

   v. NOPSEMA Considerations when Assessing Greenhouse Gas Emissions and Associated Impacts to the Environment through Global Climate Change Assessment Guide (2025)

   vi. Department of Industry, Science, Energy and Resources, Guideline: Offshore Petroleum Decommissioning (2022)

[1] https://www.environment.gov.au/protection/assessments/strategic/offshore-petroleum-greenhouse-gas

e. Procedures:

   i. NOPSEMA Offshore project proposal assessment standard operating procedure (N-04790–SOP1678).

f. Information papers:

   i. NOPSEMA Making public comment on offshore project proposals information paper (N-04790-IP1664)

   ii. NOPSEMA Reducing marine pest biosecurity risks through good practice biofouling management information paper (N-04750-IP1899)

   iii. NOPSEMA Acoustic impact evaluation and management information paper (N-04750-IP1765)

g. Bulletins:

   i. NOPSEMA Oil spill modelling Environment Bulletin (2019)

h. The findings and briefings provided by the assessment team

i. Technical advice from the Clean Energy Regulator.

j. Relevant policies, plans of management, recovery plans, conservation advice and other guidance for matters protected under the EPBC Act, including:

   i. Commonwealth of Australia, Threat Abatement Plan for the Impacts of Marine Debris on the Vertebrate Wildlife of Australia's Coasts and Oceans (2018)

   ii. Commonwealth of Australia, Recovery Plan for Marine Turtles in Australia 2017–2027 (2017)

   iii. Commonwealth of Australia, Conservation Management Plan for the Blue Whale 2015–2025 (2015)

   iv. Commonwealth of Australia, National Recovery Plan for the Southern Right Whale *Eubalaena australis* (2024)

   v. National Light Pollution Guidelines for Wildlife, including marine turtles, seabirds and migratory shorebirds (DoEE, 2020).