NOPSEMA
Australia's offshore energy regulator

STATEMENT OF REASONS

Acceptance of the Goodwyn Area Infill Development Offshore Project Proposal

Document No: A1208947

Date: Tuesday, 28 October 2025

1. On Wednesday, 27 August 2025 I, Sue McCarrey, as the Chief Executive Officer (**CEO**) of the National Offshore Petroleum Safety and Environmental Management Authority (**NOPSEMA**), decided, pursuant to sub-s 13(1)(a) of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023* (**Environment Regulations**), to accept the Goodwyn Area Infill Development Offshore Project Proposal (Document No: A1806RH000003, Revision 7, dated August 2025) (**OPP**), as I was reasonably satisfied that the OPP met the criteria in sub-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 Woodside Energy Limited (**proponent**) to enable the proponent to undertake the offshore project described in the OPP, which involves the production of petroleum resources in the North West Shelf, in offshore waters off Western Australia. The petroleum activities that are part of the offshore project include drilling, installation, commissioning, production, and decommissioning of infrastructure. The offshore project will tie into existing offshore petroleum infrastructure, which is operated by the proponent, to supply hydrocarbon products to international and Western Australian domestic markets via the existing Karratha 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

   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 an Assessment Manager, 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 assessments comprising:

      i. matters protected under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**)

      ii. emissions and discharges (planned), with a focus on greenhouse gas emissions

iii. sensitive environments, with a focus on impacts and risks to cultural heritage values

iv. physical effects, with a focus on seabed disturbance and resulting impacts to benthic habitats.

7. All references to parts, sections, subsections, paragraphs, and subparagraphs of regulations are to the Environment Regulations unless otherwise stated.

8. Other terms used in this Statement of Reasons may be defined in the Environment Regulations and the OPGGS Act and have the same meaning as under the Environment Regulations or OPGGS Act.

Background

9. On Tuesday, 6 February 2024, the proponent submitted the OPP to NOPSEMA in accordance with s 6.

10. On Friday, 26 July 2024, I decided that:

    a. the OPP was suitable for publication because I was reasonably satisfied it met the criteria in sub-s 9(4)

    b. a 56 day (eight week) public comment period was appropriate given the nature and scale of the offshore project.

11. On Monday, 29 July 2024 the public comment period commenced.

12. On Monday, 23 September 2024 the public comment period concluded.

13. On Thursday, 7 November 2024 the proponent revised and resubmitted the OPP following the public comment period in accordance with s 11.

14. I requested the proponent provide further written information under sub-s 12(1) on Monday, 9 December 2024. The proponent revised the OPP in response to this request and resubmitted the OPP on Tuesday, 4 February 2025.

15. I requested the proponent provide further written information under sub-s 12(1) on Thursday, 6 March 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Tuesday, 27 May 2025.

16. I requested the proponent provide further written information under sub-s 12(1) on Wednesday, 25 June 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Wednesday, 16 July 2025.

17. I requested the proponent provide further written information under sub-s 12(1) on Thursday, 31 July 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Monday, 11 August 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, I had to be reasonably satisfied that the criteria in sub-s 13(4) were met in order to accept the OPP.

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

20. I was reasonably satisfied that the OPP meets the requirements of sub-s 13(4)(a) and adequately addresses comments given during the public comment period because of the reasons set out below.

21. I was reasonably satisfied that the OPP adequately addresses comments given during the period for public comment because Appendix K of the OPP:

    a. comprehensively summarised the three comments received during the public comment period

    b. clearly identified the objections and claims made in the public comments about the offshore project or any activity that is part of the offshore project

    c. assessed the merits of each objection or claim identified within the public comments about the project or any activity that is part of the project and considers the facts, reasons, and evidence to support the conclusions of the assessment

    d. included a statement of the proponent's response to each objection or claim raised through public comment and suitable reasoning to support the response

    e. summarised the changes that were made to the OPP in response to the public comments.

22. I was also reasonably satisfied the proponent's responses to public comments were adequate because they were based in relevant facts, reasons, and evidence, which support the responses to the objections and claims and, where applicable, presented further information that had a basis in relevant facts and evidence from appropriate scientific literature.

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

23. I was reasonably satisfied that the OPP meets the requirements of sub-s 13(4)(b) being appropriate for the nature and scale of the offshore project because of the reasons set out below.

24. In considering whether the OPP was appropriate for the nature and scale of the project, I found the OPP:

    a. identified, and gives appropriate weight, to matters protected under Part 3 of the EPBC Act when evaluating impacts and risks

    b. provided greater detail and analysis in the descriptions and evaluations of high consequence impacts and risks compared to lower consequence impacts and risks

    c. provided levels of environmental performance that protect particularly sensitive environments and outstanding environmental values, which include:

        i. shoals and banks within the project area

        ii. the Montebello Marine Park

        iii. the Murujuga Cultural Landscape World Heritage Property and Dampier Archipelago (including Burrup Peninsula) National Heritage Place.

25. I found that the OPP described a 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 the OPP:

    a. clearly and logically described, and applied, the process by which the OPP evaluates environmental impacts and risks, which aligned with recognised environmental impact and risk management standards (e.g., AS/NZS ISO 31000:2018) (Section 4 of the OPP)

    b. used a decision support framework (Section 4.5.1 of the OPP) which scaled the level of detail in the analysis and evaluation of impacts and risks to be commensurate with the level of uncertainty or novelty associated with the impacts and risks.

    c. identified the environmental aspects of the project's activities and described the pathways by which these aspects may cause an environmental impact (Sections 9 and 10 of the OPP)

    d. described the environment that may be affected by the environmental aspects of the activities that are part of the project (Section 7 of the OPP).

26. I found that the environmental management system elements and processes described in Sections 4 and 11 of the OPP aligned with the ISO 14001 and ISO 31000 standards, which were appropriate management system standards to apply to the evaluation and management of environmental impacts and risks of the project. These standards were developed by subject matter experts and are widely applied in the environmental management of offshore petroleum activities.

27. I found Section 5 of the OPP described the scope and bounds of the offshore project. The description provided an adequate basis for the proponent to evaluate all environmental impacts and risks. This is because Section 5 of 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 across several phases include:

    a. drilling and completion of up to eight wells

    b. installation and pre-commissioning of subsea infrastructure to tie the wells to the existing Goodwyn Alpha (**GWA**) production platform

    c. start-up and operation of the wells and subsea infrastructure, including inspection, monitoring, maintenance, and repair activities

    d. decommissioning, including plugging of wells and removal of property

    e. support activities for all the above.

28. I found the OPP bound activities for which there is uncertainty by clearly defining the project area and limiting all activities that are part of the offshore project to within the project area.

29. I found the OPP 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, the sequence of fields to be developed, and the timing of development activities. I found the proponent cannot resolve uncertainty in some details of the project's activities at the time of acceptance of the OPP as some details depend on the outcomes of preceding project activities, such as surveys to inform the design of the project infrastructure and the results of drilling activities.

30. Where aspects of the offshore project and the activities that are part of the offshore project were uncertain, I found that assumptions made in the face of uncertainty, such as indicative locations of infrastructure and wells, composition of reservoir fluids, and timing of activities, were appropriate given the nature and scale of the activities and supported with adequate reasoning.

31. I found Section 4 of the OPP 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 were described in Sections 5 and 9 of the OPP in appropriate detail given the nature and scale of the activities. The descriptions of the aspects of underwater noise emissions, hydrostatic test fluid discharges, drilling discharges, produced water management, and hydrocarbon spills were informed and supported by technical reports which are appended to the OPP.

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

    a. defined the environment that may be affected based on stochastic hydrocarbon spill modelling studies, which considered the worst-case credible hydrocarbon spills that may occur during the project and aggregated the results of hundreds of deterministic model runs with varying meteorological and oceanographic conditions

    b. used the environment that may be affected to define spatial extent for the description of the environment in Section 7 of the OPP

    c. used the EPBC Act protected matters search tool reports (Appendix B to the OPP) to identify matters protected under Part 3 of the EPBC Act and other matters protected by the EPBC Act in the project area and the environment that may be affected by a worst-case hydrocarbon spill

    d. used relevant scientific literature, including environmental survey reports, to characterise the benthic habitats and communities, sediment quality, and water quality in the project area

    e. used modelling studies to predict the spatial extent of the environment that may be affected by underwater noise emissions, light emissions, hydrostatic test fluid discharges, drilling discharges, and hydrocarbon spills, which apply appropriate impact thresholds to estimate the nature and scale of these environmental aspects and their associated impacts and risks.

33. I found the process described in paragraph 32 of this Statement of Reasons was applied appropriately throughout the OPP when considering the nature and scale of the environmental impacts and risks associated with the project.

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

    a. the physical characteristics of the environment, such as water quality, sediment quality, and bathymetry

    b. ecosystems, habitats, species, and biological communities, with a focus on matters protected under Part 3 of the EPBC Act

    c. Commonwealth and State protected areas

    d. socio-economic features such as shipping, defence, petroleum exploration and production, tourism and recreation, and Commonwealth and State-managed commercial fisheries

    e. cultural features and heritage values.

35. I found the OPP described relevant values and sensitivities of the environment listed under Part 3 of the EPBC Act that may be affected by the project (Sections 7 and 9 of the OPP), including:

    a. World Heritage Properties and National Heritage places

    b. relevant values of the Commonwealth marine area described in the Marine Bioregional Plan for the North-west Marine Region (Commonwealth of Australia, 2012), including water quality, sediment quality, bathymetry, seabed features, benthic habitats and communities, and key ecological features

    c. species listed as threatened or migratory under the EPBC Act, including biologically important areas and habitats critical for the survival of a species for threatened and migratory species, and relevant information from plans, policies, and guidance published under the EPBC Act.

36. I found the project area partially overlaps the Ancient Coastline at 125 m depth contour key ecological feature described in the Marine Bioregional Plan for the North-west Marine Region (Commonwealth of Australia, 2012), which was adequately considered in the environmental impact and risk evaluations.

37. I found the project area partially overlaps the multiple use zone of the Montebello Marine Park. I found the petroleum activities described in the OPP that may occur in the multiple use zone of the Montebello Marine Park would not be inconsistent with activities permitted by North-west Marine Parks Network Mining Operations Class Approval. The nature of the activities that may occur in the Montebello Marine Park, such as anchoring and vessel-based activities, will not result in unacceptable impacts to the values of the park.

38. I found that the OPP identified and described the feasible alternatives to the project and the activities that are part of the project (Section 6 of the OPP), including:

    a. a clear description of the relevant criteria, including environmental criteria, used to identify and compare the feasible alternatives to the project and the activities that are part of the project

    b. a description of the feasible alternatives to the project and the activities that are part of the project, including reasons why each was feasible or not

    c. evaluations of the feasible alternatives to the project and activities that are part of the project using the criteria established in Section 6.1.1 of the OPP supported by adequately detailed explanations of why the feasible alternatives were not preferred.

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

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

40. As described in paragraph 25 of this Statement of Reasons, I found the OPP described a clear and logical process for identifying, describing, and evaluating environmental impacts and risk, which was consistently applied to the environmental aspects of the project.

41. I found the OPP 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 the OPP defined acceptable levels of environmental impact and risk (Section 4.8 of the OPP), which includes consideration of:

        i. the principles of ecologically sustainable development (Section 4.8.3 of the OPP)

ii. the proponent's policies, standards, risk management frameworks, and procedures where relevant (Section 4.8.4 of the OPP)

iii. stakeholder consultation during preparation of the OPP and public comment made on the OPP (Section 4.8.5 of the OPP)

iv. relevant legislation and guidelines (Section 4.8.6 of the OPP).

b. using this process to define acceptable levels of impact and risk for the project and the activities that are part of the project (Section 4.7 and Table 4-3 of the OPP).

42. I found the OPP defined acceptable levels of impact and risk based on analysis of relevant facts and evidence (Section 4.7 of the OPP), because:

a. the defined acceptable levels of impact and risk are relevant to the ecological, biodiversity, cultural, and social features of the environment that may be affected by the project

b. the defined acceptable levels of impact and risk are consistent with requirements that apply to the project and the activities that are part of the project, such as the principles of ecologically sustainable development, relevant guidance material, and recovery plans for species listed as threatened under the EPBC Act.

43. I found that the OPP applied an evidence-based evaluation process to demonstrate that the 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 and risks of the project and the activities that are part of the project with the defined acceptable levels

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

d. references to appropriate information, such as scientific studies and technical appendices to the OPP, that inform and support the evaluations of environmental impacts and risks.

44. I found the OPP acknowledged and accounted for uncertainty associated with predicted environmental impacts of the project. The OPP considered 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 uncertainty had been addressed in the OPP include:

a. in the reliability of predictions of impact and risk for underwater noise associated with offshore project activities resulting from the inherent uncertainty of the timing of activities. The OPP appropriately considered activities being undertaken during times of peak seasonal occurrence for species vulnerable to noise impacts, including concurrent and successive activities as part of impact evaluations. The OPP set out appropriate acceptable levels of impact and EPOs (supported by a suite of control measures). For example, control measure CM-17 required a review of underwater sound modelling as part of the assessment of impacts and risks for inclusion in Environment Plans, prior to project activities being undertaken; the schedule and timing of activities can be planned with a greater level of certainty at this time.

b. in the reliability of predictions of impact and risk for artificial light emissions due to the inherent uncertainty of the timing, location, and nature of some project activities. The OPP applied a precautionary approach by assessing impacts and risks of artificial light emissions using the spatial extent of flaring, which represented the greatest light source that may occur during the activity. The

spatial extent of the environment that may be affected by artificial light emissions was informed by modelling studies, which were an appropriate analogue for the activities that may occur during the project. Uncertainty in the location of activities that emit artificial light was addressed by the assumption that such activities could occur at any point within the project area. This precautionary approach in spatial extents of predicted artificial light exposure was shown in Section 9.2.3 of the OPP.

c. in relation to the final location of project infrastructure to be installed on the seabed, which will be subject to detailed design prior to being constructed. As a result, there was uncertainty in the benthic habitats and communities that may be disturbed. The OPP provided a reasoned prediction of the types of seabed habitats expected across the project area to inform the impact evaluation presented. This included EPOs, supported by control measures, that commit to further surveys being undertaken and plans applied that will identify and avoid unique benthic habitats during project design and implementation.

d. in the nature and scale of the accidental hydrocarbon spill scenarios that may occur during the project. The OPP considered several worst-case credible hydrocarbon spills, with the loss of well containment scenario resulting in the greatest potential for impact due to the duration and the volume of hydrocarbons released. The spatial extent of hydrocarbons above thresholds that may cause impacts to the environment was estimated using stochastic modelling (Appendix J of the OPP). The modelling used a release location that is relatively close to sensitive receptors, such as the shoreline and the Montebello Marine Park, applying a precautionary approach given the uncertainty of well locations. The modelling applied thresholds that are consistent with NOPSEMA guidance and used a stochastic modelling approach which aggregated the results of hundreds of deterministic model runs to determine the environment that may be affected.

45. I found the OPP's evaluation of environmental impacts and risks included a focus on the higher order environmental impacts and risks which are addressed in detail in these reasons below, including in relation to:

    a. environmental impacts and risks to matters protected under Part 3 of the EPBC Act; in particular, listed threatened and migratory species including cetaceans, birds, turtles, and whale sharks

    b. environmental impacts and risks arising from greenhouse gas emissions

    c. environmental impacts and risks to sensitive environments, including underwater and First Nations cultural heritage values

    d. environmental impacts and risks resulting from physical effects, such as seabed disturbance during the installation of equipment on the seabed.

46. In deciding the OPP met the requirements of sub-s 13(4)(c), I placed considerable weight on the following matters addressed in the OPP:

    a. The appropriate description of the key physical, biological, social, economic, and cultural features, values and sensitivities of the environment which may be affected by the project. In particular, the OPP appropriately identified and described the key physical, biological, social, economic, and cultural features, values and sensitives of the environment that overlap with the environment that may be affected by the project. I considered that the OPP used relevant references and information sources to adequately inform and support the descriptions, such as contemporary peer-reviewed scientific literature and other authoritative sources (Section 7).

b. In relation to environmental impacts and risks to matters protected under Part 3 of the EPBC Act:

   i. I found the followed a logical process to identify and describe the matters protected under Part 3 of the EPBC Act that may be present within the project area and the environment that may be affected by the project (based on worst-case hydrocarbon spill modelling results)

   ii. I found the OPP presented relevant information to adequately inform and support the descriptions, such as threat abatement plans, threatened species recovery plans, and marine bioregional plans

   iii. I found the OPP included descriptions of the impact pathways by which the range of environmental aspects may impact upon matters protected under Part 3 of the EPBC Act

c. In relation to environmental impacts and risks arising from greenhouse gas emissions:

   i. In assessing the OPP, I had regard to s 527E of the EPBC Act and the EPBC Act Policy Statement 'Indirect consequences of an action: Section 527E of the EPBC Act', in relation to greenhouse gas emissions. I considered the indirect downstream scope 3 greenhouse gas emissions that will be generated by transport and use of the petroleum products produced by the project to be indirect consequences of the project that would likely fall within the definition of 'impact' under the Environment Regulations and within the context of s 527E of the EPBC Act

   ii. I found the OPP identified and described sources of greenhouse gas emissions for activities that are part of the project, including indirect emissions from the transportation and end use of the hydrocarbon produced by the project

   iii. I found the OPP estimated the amount of greenhouse gas emissions that may occur as a result of the project using appropriate quantification methods

   iv. I found the OPP described the key international arrangements, Australian legislative framework, and the company strategy and actions relevant to greenhouse gas emissions reduction. For example, the OPP described:

      A. the Paris Agreement, which Australia has ratified

      B. the National Greenhouse and Energy Reporting Scheme

      C. the Safeguard Mechanism, under which the North West Shelf facility is registered; it is the North West Shelf facility that is beyond the project area that will transport, process, and store the hydrocarbons produced by the project

      D. the proponent's measures to monitor and manage greenhouse gas emissions from the project.

d. In relation to environmental impacts and risks to sensitive environments, including underwater and First Nations cultural heritage values:

   i. I found the OPP described the underwater and cultural heritage values that may be impacted by the project and an appropriate level of detail

   ii. I found the evaluation of impacts to underwater and cultural heritage values considered impacts and risks arising from the project to both tangible and intangible cultural heritage values

   iii. I found the evaluation of impacts to underwater and cultural heritage values considered the potential for indirect emissions from processing the hydrocarbons produced by the project at

the Karratha gas plant to impact rock art within the Murujuga Cultural Landscape World Heritage Property by:

A. acknowledging uncertainty in the impacts of indirect emissions from the offshore project on rock art values of the Property

B. committing to maintaining the Murujuga Rock Art Strategy and membership of the Murujuga Rock Art Reference Group

C. setting an environmental performance outcome that provides a high level of protection of rock art within the Property

D. demonstrating that the management of emissions is not inconsistent with the World Heritage Convention, the Australian World Heritage management principles set out in Sch 5 of the Environment Protection and Biodiversity Conservation Regulations 2000, and plans made for the management of the Property

e. In relation to environmental impacts and risks resulting from physical effects:

i. I found the OPP identified and described the benthic habitats in an appropriate level of detail given size of the project area

ii. I found the OPP described relatively high value or unique seabed features in the project area, such as Rankin Bank, Wilcox Shoal, the Ancient Coastline at 125 m Water Depth Key Ecological Feature, and the Montebello Marine Park

iii. I found the OPP referenced appropriate scientific literature and survey results

iv. I found the OPP acknowledged uncertainty in benthic habitats that may be impacted by the project because:

A. the project area has not been completely surveyed

B. the location of activities that will disturb the seabed have not been finalised

v. I found such uncertainty was addressed through control measures (CM-07 and CM-09) that commit to identification and consideration of benthic habitats that may be impacted once the locations of activities and infrastructure are confirmed.

47. I found the OPP demonstrated that the environmental impacts of the 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)

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

49. I found the OPP included a demonstration of acceptability in the evaluation of each environmental impact and risk (Sections 9.2, 9.3, and 9.4 of the OPP) arising from the environmental aspects of the project. Each demonstration:

    a. appropriately evaluated the predicted environmental impacts and risks for each environmental aspect of the project and activities that are parts of the project; refer to paragraphs 39-47 for reasons why the impacts and risks were appropriately identified and evaluated

    b. compared the predicted impacts and risks to the relevant defined acceptable levels in Section 4 of the OPP and demonstrated that the levels of impact and risk defined by the environmental performance outcomes are equal to, or less than, the defined acceptable levels

    c. consistently applied the process set out in Section 4 of the OPP for each environmental impact and risk evaluation; refer to paragraph 41 and 42 of this Statement of Reasons as to why I found this process appropriate

    d. established environmental performance outcomes for each environmental aspect which, supported by control measures, provide a high level of confidence that the environmental impacts and risks will be managed to an acceptable level.

50. I found the OPP implemented an evidence-based evaluation process to demonstrate that potential impacts and risks to the environment will be managed to an acceptable level by achieving the environmental performance outcomes set out in the OPP. The environmental performance outcomes are supported by control measures.

51. Control measures as defined in s 5 are not required be included in an OPP. However, this OPP includes control measures, which although not strictly consistent with the definition, I considered to be useful to show how the proponent may achieve the associated EPOs. I therefore gave weight to them when deciding whether the OPP demonstrated that the impacts and risks of the project will be managed to an acceptable level.

52. I found the assessment of the OPP under sub-s 13(4)(d) focussed on the acceptability of higher order environmental impacts and risks which are covered in the detailed assessment topics listed in paragraph 6 of these reasons, I explain my reasoning in relation to acceptability of these higher order impacts in paragraphs 53 to 63.

53. In relation to environmental impacts and risks to matters protected under Part 3 of the EPBC Act, I found:

    a. the OPP defined acceptable levels of impacts and risks that are applicable to matters protected under Part 3 of the EPBC Act that may be impacted by the project which, among others, were set out in Table 4-3 of the OPP.

    b. the sources and justifications for these acceptable levels of impact set out in Table 4-3 included consideration of, or are consistent with, documents published under the EPBC Act, such as:

        i. the Marine Bioregional Plan for the North-west Marine Region

        ii. the North-west Marine Parks Network Management Plan 2018

        iii. recovery plans for the threatened species

        iv. the Threat Abatement Plan for the Impact of Marine Debris on the vertebrate wildlife of Australia's Coasts and Oceans

c. the demonstrations of acceptability for environmental aspects that may impact upon matters protected under Part 3 of the EPBC Act appropriately considered relevant material published under the EPBC Act, such as conservation advice, recovery plans, threat abatement plans, and guidelines, and showed that the offshore project will not be inconsistent with such material.

d. the environmental performance outcomes in the OPP provide for an acceptable level of impact to World Heritage Properties, National Heritage Properties, Ramsar Wetlands, and Threatened Ecological Communities. None of these protected matters occur within the project area. Apart from the Murujuga Cultural Landscape World Heritage Area and Dampier Archipelago (including Burrup Peninsula) National Heritage Place (which is considered in the point below), these protected matters would only credibly be impacted by the project through accidental hydrocarbon spills. EPO-25 and EPO-26 set the level of environmental performance at 'no spills', which provided an appropriate level of environmental performance to protect these matters.

e. the OPP identified the Murujuga Cultural Landscape World Heritage Property and Dampier Archipelago (including the Burrup Peninsula) National Heritage Place as potentially being indirectly impacted or at risk because of the project. The indirect impact or risk may arise from the portion of the emissions from the existing Karratha Gas Plant that result from the processing of the project's hydrocarbons. These emissions are hypothesised to damage the rock art values of the Murujuga Cultural Landscape World Heritage Property and Dampier Archipelago (including the Burrup Peninsula) National Heritage Place. EPO-28 of the OPP commits to preventing accelerated weathering of rock art in the Murujuga Cultural Landscape World Heritage Property from air emissions that result from onshore processing of the project's gas. EPO-28 is supported by:

   i. CM-57, which commits the proponent to undertaking activities at the Karratha Gas Plant in accordance with applicable Ministerial Statements. I found Ministerial Statement 1233 requires the proponent to take a number of measures that provide for the protection of the rock art values (conditions 3-1 to 3-13).

   ii. CM-60, which commits the proponent to maintaining the Murujuga Rock Art Strategy and membership of the Murujuga Rock Art Reference Group.

f. EPO-05, EPO-06, EPO-07, EP-20, EPO-23, EPO-24, EPO-25, and EPO-26, and the associated control measures, were appropriate to manage impacts and risks to species listed as threatened or migratory under the EPBC Act to an acceptable level.

g. EPO-02, EPO-03, EPO-04, EPO-05, EPO-06, EPO-07, EPO-08, EPO-13, EPO-14, EPO-15, EPO-16, EPO-17, EPO-18, EPO-19, EPO-21, EPO-22, EPO-23, EPO-24, EPO-25, and EPO-26, and the associated control measures, were appropriate to manage impacts to the Commonwealth marine environment to an acceptable level.

h. the offshore project will not be carried out in a way that is inconsistent with relevant EPBC Act management plans for listed threatened species. For example, EPO-06 commits to ensuring that the activities that are part of the offshore project will not be done in a manner that is inconsistent with any threatened species or community management plan or threat abatement plan made or adopted under the EPBC Act.

i. relevant policy and guidance documents were used by the proponent to support the evaluations of environmental impacts and risks to demonstrate that the offshore project is able to be managed to ensure environmental impacts and risks will be of acceptable levels. These include:

   i. the National Light Pollution Guidelines for Wildlife

ii. the 2024 Update to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 3.0): Underwater and In-Air Criteria for Onset of Auditory Injury and Temporary Threshold Shifts.

54. In relation to environmental impacts and risks arising from greenhouse gas emissions, I found:

a. the greenhouse gas emissions from the processing, transportation, and end use of the hydrocarbons produced by the project will be secondary actions that are likely to be indirect consequences, and hence impacts, of the offshore project when considering the Policy Statement 'Indirect consequences' of an action: Section 527E of the EPBC Act (Refer to paragraphs 86 to 88 for further consideration of s 527E and the EPBC Act Program). Accordingly, the OPP must demonstrate that impacts from processing, transportation and end use of the hydrocarbons produced by the project will be managed to an acceptable level.

b. the OPP defined two levels of impact for greenhouse gas emissions, which it calls 'Acceptable levels' (AL-9 and AL-10) and provides analysis as to why the proponent considers these levels are acceptable and consistent with the principles of ecologically sustainable development (Table 4-3).

c. AL-09 applies to emissions within Australia, including the project's emissions from processing of the hydrocarbons at the Karratha Gas Plant and emissions from the transportation and consumption of the project's hydrocarbons within Australia. AL-09 relies on the safeguard mechanism set out in the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015 (Safeguard Mechanism), which is the mechanism by which Australia gives effect to the Paris Agreement.

d. that the project's direct and indirect greenhouse gas emissions within Australia will be managed to an acceptable level through the application of the Safeguard Mechanism. I found the emissions from the processing of the project's hydrocarbons at the Karratha Gas Plant will be emissions covered by the existing North West Shelf Project safeguard facility. I found that transportation and end use of the project's hydrocarbons within Australia will also be subject to the Safeguard Mechanism, noting these emissions are beyond the proponent's operational control.

e. environmental performance outcome EPO-10 will manage the project's emissions from offshore and onshore processing within Australia in accordance with the safeguard mechanism. I found this environmental performance outcome to be appropriate in achieving an acceptable level of greenhouse gas emissions because the proponent's emissions from offshore and onshore processing will not exceed the level set out in AL-09.

f. AL-10 requires the project's emissions (both within and outside Australia) to not materially or substantially contribute to global greenhouse gas emissions. The reasoning set out in the impact evaluation (Section 9.2.7 of the OPP) and the justification for AL-10 in Table 4-3 of the OPP acknowledged the link between anthropogenic greenhouse gas emissions and climate change and sets the project' emissions in the context of global carbon budgets. I found the OPP demonstrates that the project's emissions will be a very small contribution to the concentration of greenhouse gases in the atmosphere, and as such will not in isolation materially or substantially contribute to increased concentrations of greenhouse gases in the atmosphere. I found the OPP also presents a reasoned argument that the project's emissions are not inconsistent with the goals of the Paris Agreement.

g. the OPP set out an environmental performance outcome (EPO-12) which constrains the project's emissions such that they will not materially or substantially contribute to global greenhouse gas emissions. I found this environmental performance outcome to be appropriate in achieving an acceptable level of greenhouse gas emissions because the emissions will not exceed the level set out in AL-10.

h. EPO-09, EPO-10, EPO-11 and EPO-12, and the supporting control measures, were consistent with the relevant requirements set out in Section 9.2.7.6 of the OPP.

i. the OPP described that the hydrocarbons produced by the project will contribute to providing a reliable, affordable, and secure energy source for end users that may have a lower emissions intensity than coal and supports the energy transition. In considering the uncertainty of the displacement of coal by gas and the difference in life cycle emissions between these energy sources, I placed no weight on this description when deciding to accept the OPP.

j. the OPP described the anticipated customers for liquefied natural gas (which constitutes the majority of the project's emissions) as being in Japan, the People's Republic of China, and the Republic of Korea. The OPP notes that each of these customer countries is a party to the Paris Agreement and has established Nationally Determined Contributions. I placed considerable weight on these facts when deciding that the impacts of greenhouse gas emissions from the transportation and end use of the project's hydrocarbons beyond Australia are acceptable.

k. AL-10, which I interpreted to establish emissions that materially or substantially contribute to global greenhouse gas emissions as being unacceptable. In the context of assessing the acceptability of greenhouse gas emissions resulting from the end use of hydrocarbons, I interpret the term 'materially or substantially' to be a level of emissions that is sufficient to influence global climate outcomes in a measurable way.

l. that AL-10 was an appropriate and acceptable level of impact because the OPP sets out, with appropriate reference to the International Energy Agency's World Energy Outlook 2024, the ongoing demand for liquefied natural gas which will in part be met by the project. I concluded that greenhouse gas emissions from the combustion of natural gas will occur because of this need being met. In recognising the necessity of liquefied natural gas and the associated emissions, the OPP also sets out the physical basis for climate change as a result of greenhouse gas concentrations in the atmosphere and the contribution of anthropogenic emissions to these concentrations. Section 9.2.7.3 of the OPP does this through reference to the Intergovernmental Panel for Climate Change's Sixth Assessment Report. I found that AL-10 balances the need for liquefied natural gas predicted in the International Energy Agency's World Energy Outlook 2024 and the environmental impacts of climate change described in the Intergovernmental Panel for Climate Change's Sixth Assessment Report.

m. the OPP quantified the estimated emissions from the Goodwyn Area Infill Development as approximately 105 million tonnes CO_2-e, stating this amount represents around 0.045% and 0.010% of the remaining global carbon budget to limit warming to 1.5 °C and 2 °C respectively (Table 9-18 in the OPP). I consider this contribution will not substantially or materially alter the trajectory of global greenhouse gas emissions or compromise international efforts to meet the objectives of the Paris Agreement.

55. I considered the expected nature of the sale of hydrocarbons produced by the project for transportation and end use beyond Australia. The OPP states that liquefied natural gas, which is the greatest portion of the hydrocarbons that will be produced by the project, is primarily consumed in Japan, the People's Republic of China, and the Republic of Korea. As set out in paragraph 54.j of this Statement of Reasons, these countries are parties to the Paris Agreement and have established Nationally Determined Contributions. I placed considerable weight on Paris Agreement being the appropriate means by which parties to the agreement manage their emissions. The Paris Agreement provides for economy-wide measures by which parties can tailor their emissions reduction methods to their own unique circumstances.

56. I considered the sale of the project's hydrocarbons for end use in countries that are not parties to the Paris Agreement. For example, this circumstance could arise through the sale of liquefied natural gas cargoes on the spot market to countries that are not signatories, or by the withdrawal of a country from the Paris Agreement in which end-use of the hydrocarbons occurs. At the time of my decision, there are 195 parties to the Paris Agreement, with the Islamic Republic of Iran, Libya, and Yemen being the only signatories to not ratify the Paris Agreement. One country, the United States of America (USA), has signalled an intention to withdraw from the Paris Agreement. The USA has not imported liquefied natural gas from Australia since 2004. Based on these facts, I considered the end use of the project's hydrocarbons in countries that have not ratified the Paris Agreement to be very unlikely.

57. I considered that restricting the project's downstream indirect emissions through restricting the sale of project's hydrocarbons could breach existing contracts and damage Australia's reputation as a reliable provider of energy. I further considered that limiting the sale of the project's hydrocarbons would be unlikely to result in a reduction in emissions, as customer's demand would continue to exist and would be met by other providers of liquefied natural gas. I determined that these considerations were not relevant to making my decision to accept the OPP and hence gave them no weight in making the decision.

58. In relation to environmental impacts and risks to sensitive environments, including underwater and First Nations cultural heritage values, I found:

    a. the OPP concluded that there are no known cultural heritage sites within the project area that could be directly impacted by the activities that are part of the offshore project. This was supported by an appropriate review of the potential for submerged cultural heritage values to exist within the project area.

    b. EPO-27 set a level of protection for underwater cultural heritage that is aligned with the requirements of the *Underwater Cultural Heritage Act 2018* and the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*. Further, control measure CM-56 relating to undiscovered finds provides the means to detect and protect underwater cultural heritage values that are unknown but would receive protection under the Act upon becoming known. This manages the uncertainty inherent in both the location of activities that may impact upon underwater cultural heritage values and undiscovered underwater cultural heritage values.

    c. the OPP included measures to resolve uncertainty about the cultural heritage values that may be impacted by the project, including commitments to identify cultural heritage values (e.g., CM-59, CM-60, and CM-61).

    d. the OPP included a commitment to support the capacity for First Nations people to engage and consult with the proponent in order to avoid impacts to cultural features and heritage values. This provides a mechanism for the proponent to identify cultural heritage values of which the proponent is currently unaware, as well as to consult with relevant persons on how to manage impacts and risks to cultural heritage values to an acceptable level.

    e. the OPP set out a range of environmental performance outcomes to protect marine fauna and sea country, which were identified as being of cultural heritage value to First Nations people (EPO-02, EPO-03, EPO-04, EPO-05, EPO-06, EPO-07, EPO-08, EPO-13, EPO-14, EPO-15, EPO-16, EPO-17, EPO-18, and EPO-19).

    f. the OPP included a range of environmental performance outcomes that prevent unplanned events which may impact upon cultural heritage values from occurring (Section 9.3 of the OPP). These environmental performance outcomes were appropriate because they prevent the unplanned events from occurring.

59. I found the OPP identified that onshore processing of the hydrocarbons produced by the offshore project will result in atmospheric emissions from the Karratha Gas Plant. The OPP stated that emissions from the Karratha Gas Plant have been hypothesised to have the potential to impact rock surfaces in proximity to the emission source. In considering the EPBC Act Policy Statement - 'Indirect consequences' of an action: section 527E of the EPBC Act, I concluded emissions from Karratha Gas Plant as a result of processing of the offshore project's hydrocarbons may be an indirect consequence of the project. Hence the OPP must demonstrate the impacts of atmospheric emissions from Karratha Gas Plant resulting from processing of the hydrocarbons produced by the project will be managed to an acceptable level. I was reasonably satisfied that the OPP demonstrated the indirect impacts of the atmospheric emissions at the Karratha Gas Plant from the processing of the hydrocarbons produced by the offshore project will be managed to an acceptable level through:

    a. EPO-28, which commits the proponent to preventing accelerated weathering of Murujuga rock art from air emissions that result from onshore processing of gas produced by the offshore project This is an appropriate environmental performance outcome as it protects the outstanding cultural value of the rock art of Murujuga from potential impacts from the project's emissions.

    b. CM-57, which commits the proponent to undertaking activities at the Karratha Gas Plant in accordance with applicable Ministerial Statements from WA Environment Protection Authority approvals. Ministerial Statement 1233 requires the proponent to take a number of measures that provide for the protection of the rock art values (conditions 3-1 to 3-13).

    c. CM-60, which commits the proponent to maintaining the Murujuga Rock Art Strategy and membership of the Murujuga Rock Art Reference Group.

60. Further reasons for my decision in relation to the Murujuga Cultural Landscape World Heritage Property and Dampier Archipelago (including Burrup Peninsula) National Heritage Place, which include rock art values in proximity to the Karratha Gas Plant, are set out in paragraphs 76 to 81 of this Statement of Reasons.

61. I note that additionally, the operation of the Karratha Gas Plant (and management of the resulting emissions) is regulated by the EPBC Act and Western Australian *Environmental Protection Act 1986* and that the project's indirect atmospheric emissions from the Karratha Gas Plant are subject to approvals under these legislative frameworks.

62. Murujuga, and the rock art values within Murujuga, may be a significant Aboriginal area and objects for the purposes of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* and that the relevant minister may make declarations under the Act to protect such areas and objects. At the time of making my decision, I noted there is an application under s 10 of the Act for the protection of Murujuga, including the rock art values within for which the Minister for the Environment and Water has not made a determination.

63. In relation to environmental impacts and risks resulting from physical effects such as seabed disturbance resulting from the installation of equipment on the seabed, I was satisfied that these impacts and risks will be managed to an acceptable level because:

    a. the OPP demonstrated a reasonable understanding of the seabed types and benthic habitats in the project area upon which to base the impact evaluation. The assertions that most of the seabed within the project area is unconsolidated sediments were supported by appropriate references to survey information.

b. the identified shoals described in the OPP such as Rankin Bank and Wilcox Shoal are known to support relatively high biodiversity and abundance communities, and I placed considerable weight on the commitments in the OPP to protect these shoals from direct seabed disturbance.

c. the OPP included commitments to address the uncertainty of impacts to benthic habitats caused by seabed disturbance including:

   i. limiting seabed disturbance to within 50 m of the planned infrastructure footprints (EPO-02)

   ii. identifying and surveying areas of hard substrate (CM-07) which are typically associated with relatively higher biodiversity benthic communities

   iii. managing impacts to areas of relatively high cover filter feeder communities by demonstrating that such impacts are reduced as low as reasonably practicable (CM-09)

d. EPO-02 and EPO-03 limit the spatial extent of the seabed disturbance, which were supported by control measures to identify and avoid benthic habitats with relatively high biodiversity values (CM-07 and CM-09).

e. the environmental performance outcomes and supporting control measures will ensure that impacts to the benthic habitat values of the multiple use zone of the Montebello Marine Park are consistent with the management objectives North-west Marine Parks Network Management Plan 2018 and the class approval for petroleum activities in Australian marine parks.

64. I found the cumulative environmental impact evaluation in Section 10 of the OPP demonstrated that cumulative impacts will be managed to acceptable levels, as:

a. the assessment identified the potential cumulative impacts that may arise from:

   i. the interactions between the environmental aspects arising from the project's activities (termed holistic impacts in Section 10.2 of the OPP); and

   ii. the interactions between the project's environmental aspects and the environmental aspects of other reasonably foreseeable activities in the region (termed cumulative impacts in Section 10.3 of the OPP).

b. the predicted cumulative impacts were compared to the evaluations for the project's aspects in Sections 9.2, 9.3, and 9.4 of the OPP. The cumulative impact assessment relies on these evaluations, and the control measures set out in Section 10.5 of the OPP, to demonstrate that the cumulative impacts will be managed to acceptable levels.

65. I found that the environmental performance outcomes for unplanned impacts, such as introduction of invasive marine species and hydrocarbon spills, were consistently set to prevent such events from occurring. This provided a clear commitment by the proponent to prevent the risks of unplanned events from becoming realised and hence preventing such risks from becoming unacceptable impacts.

66. I found the OPP made clear commitments to achieve the environmental performance outcomes through the implementation of the control measures associated with the outcomes. In doing so, the offshore project can be implemented in a way that is consistent with the commitments made in the OPP and ensures environmental impacts and risks will be acceptable. I found Section 11 of the OPP outlined key parts of the environmental management system that will be applied when undertaking the project and activities that are part of the project. I found key parts of the proponent's environmental management system described in the OPP included:

a. the systems, practices, and procedures, which are inherent in the proponent's Woodside Management System (WMS) described in Section 11.2 of the OPP

b. the change management procedure described in Section 11.3 of the OPP. I found the management of change process was appropriate given the duration of the project, and the likelihood of changes occurring that need to be managed to ensure environmental impacts and risks remain acceptable. I considered NOPSEMA will have further opportunities to ensure change is managed appropriately through the environment plan process (paragraph 67 of this Statement of Reasons).

c. the emergency response plans described in Section 11.4 of the OPP which are required to be developed and submitted as part of future environment plans.

d. the monitoring (Section 11.5 of the OPP), assurance (Section 11.6 of the OPP), and reporting (Section 11.7 of the OPP), which included details on specific arrangements relating to seabirds (Section 11.5.1 of the OPP) and cetaceans (Section 11.5.2 of the OPP). These provided further details on how relevant environmental performance outcomes will be achieved.

67. The requirement for environment plans to be accepted by NOPSEMA prior to commencing petroleum activities that are part of the offshore project, which is acknowledged repeatedly in the OPP, provided me with further assurance that impacts and risks will continue to be managed to an acceptable level over the life of the project.

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)

68. I was reasonably satisfied that the OPP meets the requirements of sub-s 13(4)(e) and sets out appropriate environmental performance outcomes for each activity that are consistent with the principles of ecologically sustainable development.

69. Where the proponent set out control measures in the OPP, I took these measures to be demonstrations of how the proponent may achieve the associated environmental performance outcomes and considered them in becoming reasonably satisfied the environmental performance outcomes were appropriate.

70. I found the environmental performance outcomes, with the associated control measures, in the OPP:

a. were consistent with the principles of ecologically sustainable development

b. demonstrated the environmental impacts and risks will be managed to an acceptable level.

71. An overview of how I considered the principles of ecologically sustainable development in assessing the environmental performance outcomes is provided below:

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

i. I considered the proponent's evaluation of the social, economic, and ecological values that may potentially be affected by the project. The OPP demonstrated an integrated approach to considering all environmental features, including relevant social, cultural and economic features that make up the environment. Specifically, the OPP included an evaluation of the potential environmental impacts and risks of the project on cultural features and heritage values, Commonwealth and State-managed fisheries, tourism and recreation, and marine and coastal industries, considering both long-term and short-term aspects. For example:

A. long-term considerations, such as decommissioning, were made, including commitments to comply with s 572 of the OPGGS Act

B. EPO-01 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.

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. I considered whether the environmental aspects of the project pose the threat of serious or irreversible environmental damage and how the proponent has addressed uncertainty.

ii. I found the proponent appropriately identified the environmental aspects that may cause serious or irreversible environmental damage (e.g., worst-case hydrocarbon spills) and hence require the consideration of the precautionary principle.

iii. Where there was uncertainty about the nature and scale of environmental impacts and risks (e.g. uncertainty in exact infrastructure location and timing of activities that are part of the project), I found the proponent has taken appropriate measures to consider uncertainty, such as:

A. undertaking environmental surveys to inform the evaluations of impact and risks in the OPP

B. undertaking a range of modelling studies, which are based on appropriately conservative scenarios, to determine the nature and spatial extent of some emissions and discharges (e.g., discharges of drilling fluids and cuttings, discharge of hydrotest fluid, underwater noise emissions, and hydrocarbon spills).

iv. I found the OPP did not use lack of scientific certainty as a reason for postponing measures to prevent environmental degradation. For example, the OPP included commitments to manage environmental performance that will either resolve, or take into account, scientific uncertainty, such as:

A. identifying and avoiding impacts to particular benthic habitats (e.g., CM-07, CM-08, and CM-09, which support EPO-02, EPO-03, and EPO-04)

B. implementing adaptive manage measures to reduce the risk of noise-related impacts to cetaceans (CM-16 and Section 11.5.2 of the OPP, which support EPO-06 and EPO-07)

C. reviewing and, if required, updating modelling studies to ensure they remain appropriate to inform the evaluations of impacts and risks (e.g., CM-14, which supports a range of EPOs relating to emissions and discharges)

D. committing to preventing accelerated weathering of Murujuga rock art from air emissions that result from onshore processing of the project's hydrocarbons (EPO-28).

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 principle').

i. I considered the proponent's evaluations that the health, diversity and productivity of the environment (as defined in s 5 to include social, economic and cultural features) is maintained or enhanced for the benefit of future generations.

ii. I found the OPP set out appropriate environmental performance outcomes to demonstrate that the project can be undertaken to ensure intergenerational equality. For example:

A. the OPP commits to meeting the requirements of s 572 of the OPGGS Act, which includes full removal of property during decommissioning. This will allow other future users of the sea, such as commercial fishers, to use the environment without restriction at the conclusion of the project.

B. the OPP considers the impact of climate change from the project's emissions, and commits to complying with the safeguard mechanism and ensuring the project's emissions do not materially or substantially contribute to global greenhouse gas emissions levels.

d. The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making (the 'biodiversity principle').

i. I considered the proponent's evaluation in the OPP of environmental impacts and risks to the biodiversity and ecological values of the Commonwealth marine area, including listed threatened and migratory species under the EPBC Act, and the environmental performance outcomes defined in the OPP.

ii. I found the environmental performance outcomes were not inconsistent with plans made under the EPBC Act for the conservation of biodiversity, such as recovery plans, conservation advice, threat abatement plans, and guidelines. For example, AL-08 requires the project's impacts to not be inconsistent with conservation advice, recovery plans and threat abatement plants for EPBC Act listed threatened, migratory, or cetacean species. AL-06 and AL-07 also commit to limiting impacts to species listed as threatened or migratory under the EPBC Act. The OPP set out environmental performance outcomes that will achieve an equal or better level of environmental performance than AL-06, Al-07, and AL-08.

iii. I found that the OPP provided an appropriate level of protection for the Montebello Marine Park, noting that:

A. the North-west Marine Parks Network Management Plan 2018 has biodiversity conservation and ecologically sustainable development as an objective of the Australian marine park network, of which the Montebello Marine Park is a part

B. the project area partially overlaps the multiple use zone of the Montebello Marine Park, and hence petroleum activities that are part of the offshore project may occur within this zone

C. the environmental performance outcomes set out in the OPP will manage impacts and risks to the values of the Montebello Marine Park to an acceptable level

D. the activities described in the OPP which may occur in the Montebello Marine Park do not appear to be inconsistent with the Class Approval – Mining Operations and Greenhouse Gas Activities – North-west Marine Parks Network Management Plan 2018.

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

   i. I considered that the proponent is required to bear the costs relating to management of environmental aspects of the project and its activities. The proponent sets out ways by which the valuation principle is given effect for the project (Table 4-5), such as:

      A. the 'polluter pays' principle within the OPGGS Act and subsidiary legislation, which requires the proponent to be responsible for any damage to the environment through their activities

      B. the application of the safeguard mechanism to the project's greenhouse gas emissions that fall within the scope of the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015, which incentivises safeguard facilities to reduce their emissions over time (EPO-10 and supporting control measures).

   ii. I found that the OPP makes appropriate commitments to comply with the requirements of s 572 of the OPGGS Act, which requires the proponent to remove their property from petroleum titles (EPO-01 and supporting control measures).

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

72. I was reasonably satisfied that the OPP meets the requirements of sub-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 EPBC Act Program

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

74. In implementing the EPBC Act Program, NOPSEMA conducts assessments of OPPs against the requirements of the EPBC Program, which includes meeting the acceptance criteria and content requirements under the Environment Regulations. Specific EPBC Act Program commitments relating to matters protected under Part 3 of the EPBC Act are outlined in Table 2 of the Streamlining Offshore Petroleum Environmental Approvals Program Report (Commonwealth of Australia, 2014) and must be applied during decision making with respect to offshore projects and activities.

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

75. I considered matters protected 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 EPBC Program on the basis that:

   a. the activity will not result in unacceptable impacts on listed threatened species and is not inconsistent with relevant recovery plans and threat abatement plans for listed threatened species

   b. potential impacts to the Commonwealth marine area from planned discharges, such as hydrostatic test water, drilling fluids, drill cuttings, and routine discharges from vessels, were appropriately assessed in the OPP in relation to potential impacts to water quality, sediment quality, marine fauna, and the values of the Montebello Marine Park

c. appropriate environmental performance outcomes and control measures were presented in the OPP to ensure that impacts to threatened or migratory species, and to the Commonwealth Marine Area, will be of an acceptable level.

76. The EPBC Act Program requires NOPSEMA to ensure the outstanding universal value of World Heritage Properties will be identified, protected, conserved and transmitted to future generations.

77. Under the EPBC Act Program NOPSEMA must not authorise any person to do anything that may contravene a plan made under s 316 of the EPBC Act for management of a World Heritage property. In addition, NOPSEMA is obliged under s 322 of the EPBC Act to take all reasonable steps to ensure it exercises its powers and performs its functions in relation to the Murujuga Cultural Landscape World Heritage Property in a way that is not inconsistent with:

a. the World Heritage Convention

b. the Australian World Heritage management principles

c. plans for managing the Property where a plan has been made under s 321 the EPBC Act.

78. As outlined in paragraph 53.e of these reasons, the OPP identifies that emissions from the processing of the project's hydrocarbons at the Karratha Gas Plant are hypothesised to potentially impact upon the rock art located in the Murujuga Cultural Landscape World Heritage Property by accelerating weathering of the rocks upon which the art is located. The OPP does not identify any other environmental aspects that may impact upon the Murujuga Cultural Landscape World Heritage Property.

79. Following inscription of the Murujuga Cultural Landscape World Heritage Property on 11 July 2025, NOPSEMA took the following steps:

a. sought, received, and considered, advice from the Department of Climate Change, Energy, the Environment and Water (the Department) regarding the status of management plans for the Murujuga Cultural Landscape World Heritage property

b. considered the plans of management that may be relevant to the potential impact of the project's emissions on the rock art values of the Murujuga Cultural Landscape World Heritage Property, and concluded the Murujuga Cultural Landscape Strategic Management Framework, which refers to Murujuga National Park Management Plan 78 2013 and 2023 amendment and Murujuga Cultural Management Plan are relevant

c. concluded that the plans listed in paragraph 79.b of this Statement of Reasons are consistent with Australia's obligations under the World Heritage Convention because on the UNESCO website the Murujuga Cultural Landscape Strategic Management Framework is a management plan for the Murujuga Cultural Landscape World Heritage Property

d. contacted the proponent on 14 July 2025 to advise that the Murujuga Cultural Landscape World Heritage Property had been inscribed and should be considered in the revised OPP being prepared by the proponent. A revision of the OPP was subsequently submitted to NOPSEMA by the proponent on 16 July 2025

e. requested that the proponent further address the World Heritage Convention, the Australian World Heritage management principles, and the plans described above in paragraph 79.b of these reasons

f. met with the proponent on 1 August 2025 and 4 August 2025 to discuss the issues raised in the request for further information.

80. The proponent subsequently revised and submitted the OPP on 11 August 2025. I found that Sections 3.6 and 9.4.8 of the OPP adequately considered the World Heritage Convention, the Australian World Heritage management principles, and the plans described above in paragraph 79.b of these reasons in relation to the potential impacts of the project upon the Murujuga Cultural Landscape World Heritage Property.

81. I found EPO-28, CM-59, and CM-62 in the accepted OPP provide an appropriate level of environmental performance and protection for the rock art values of the Murujuga Cultural Landscape World Heritage Property. As a result of these commitments, I found the OPP is not inconsistent with the protection, conservation, presentation or transmission to future generations of the World Heritage values of the Murujuga Cultural Landscape World Heritage Property.

The EPBC Act Program: Cumulative Environmental Impacts

82. In the context of the EPBC Program, cumulative impacts refer to the direct and indirect impacts of a number of different 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.

83. I considered that cumulative environmental impacts may be successive, additive, or synergistic impacts of activities or projects with material impacts on the environment that have the potential to accumulate over temporal and spatial scales.

84. I considered the potential for cumulative environmental impacts to the Commonwealth marine area as required by the EPBC Program, noting the titleholder had specifically evaluated cumulative impacts in relevant parts of the OPP. For example:

    a. Impacts from interactions between different environmental aspects of the activities that are part of the offshore project, termed holistic impacts in the OPP, are considered in Section 10.2 of the OPP.

    b. Impacts from interactions between the offshore project and other actions, termed cumulative impacts in the OPP, are considered in Section 10.3 of the OPP.

85. I was reasonably satisfied that cumulative impacts will be managed to an acceptable level because I found Section 10 of the OPP demonstrated the holistic and cumulative impacts are sufficiently similar in nature and scale to those evaluated in Section 9 of the OPP. I was reasonably satisfied that the impact and risk evaluations, environmental performance outcomes, and associated control measures in Section 9 of the OPP will manage impacts and risks to acceptable levels, hence I am reasonably satisfied that holistic and cumulative impacts will be acceptable.

The EPBC Program: Indirect Consequences of an Action

86. Under the EPBC Act Program, NOPSEMA must have regard to relevant EPBC Act 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 s 527E of the EPBC Act. 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.

87. In assessing the OPP, I had regard to the indirect consequences policy, and considered that:

    a. Atmospheric emissions from the Karratha gas plant as a result of processing hydrocarbons produced by the offshore project are likely to be an indirect consequence of the offshore project (refer to paragraph 59). I found that the OPP demonstrated that the potential impact of these emissions will be managed to an acceptable level, as described in paragraph 59.

b. Indirect downstream greenhouse gas emissions from the transportation and end use of the hydrocarbons produced by the offshore project are likely to be an indirect consequence of the offshore project (refer to paragraph 54). I found that the OPP demonstrated that the impact of these emissions will be managed to an acceptable level, as described in paragraphs 54, 55, and 56.

88. I found that, for the reasons outlined above, that the OPP gave adequate regard to the indirect consequences policy by identifying and assessing indirect impacts from the project.

Signed

Sue McCarrey
Chief Executive Officer

28 October 2025

Appendix A: Key Materials Considered in Making the Decision

89. The key materials that I considered in making this decision included:

a. The OPP, comprising the proposal submitted to NOPSEMA by Woodside Energy Limited (Document Number A1806RH000003, Revision 7, dated August 2025 and the supporting appendices, which include a summary of the public comments received.

b. The legislative framework relevant to OPP assessments:

i. the OPGGS Act

ii. the Environment Regulations

iii. the EPBC Act

iv. the Endorsed EPBC Program[1]

v. the Class Approval – Mining Operations and Greenhouse Gas Activities – North-west Marine Parks Network Management Plan 2018.

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 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 Decommissioning Compliance Strategy 2024 – 2029 (2024)

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

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

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)

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

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. Advice from other government agencies and departments

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, Wildlife Conservation Plan for Migratory Shorebirds (2015)

v. Director of National Parks, North-west Marine Parks Network Management Plan (2018)

vi. Commonwealth of Australia, Wildlife Conservation Plan for Seabirds (2020)

vii. Commonwealth of Australia, National Recovery Plan for Albatrosses and Petrels (2022)

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

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

x. The National Heritage management principles

xi. The Australian World Heritage management principles

k. Plans relevant for the management of the Murujuga Cultural Landscape World Heritage Property:

i. Murujuga Cultural Landscape Strategic Management Framework

ii. Murujuga National Park Management Plan 2013 and the 2023 amendment

iii. Murujuga Cultural Management Plan2016