

Document	Summary of external feedback	NOPSEMA response and actions
WOMP Content and Level of Detail Guidance Note	<p>Stakeholders raised the following feedback regarding the WOMP Content and Level of Detail Guidance Note:</p> <ul style="list-style-type: none"> <li>• Guidance on the application of the concepts of ALARP and acceptable levels of risk, including how these concepts are assessed and how they differ or interact.</li> <li>• Clarification of expected WOMP content for concept select during different lifecycle phases, including, design, construction, operation, intervention, and abandonment.</li> <li>• Clarification on the level of detail and expected in WOMPs around roles and responsibilities of personnel, focusing on personnel whose activities materially influence well integrity across relevant lifecycle stages</li> <li>• Clarification of the new terms in section 82(5)</li> <li>• Guidance on what constitutes organisational learning processes in relation to well integrity, including the type of information or evidence expected to be provided</li> <li>• Clarification on whether content in one WOMP can be referred to in a future WOMP versus a WOMP being a stand-alone document.</li> <li>• Request for clearer alignment between the staged WOMP information paper and WOMP content guidance for WOMP content.</li> <li>• Clarification on whether NOPSEMA will accept a WOMP for specific well activities or for certain stages of the well lifecycle.</li> <li>• Clearer guidance on triggers for WOMP revisions, revisions in part and guidance on when a full revision or partial update may be appropriate.</li> </ul>	<p>NOPSEMA has reviewed and updated the WOMP Content and Level of Detail guidance note to address a range of identified issues, specifically:</p> <ul style="list-style-type: none"> <li>• Refine the expected content on concept select, the level of detail commensurate to the level of risk and for different lifecycle stages.</li> <li>• Clarify that the level of detail in a WOMP must be proportionate to risk, complexity and uncertainty, and appropriate to the scope of activities covered.</li> <li>• Clarify that the requirement under section 82.7 applies to personnel who plan, approve or execute well activities at any stage of a well's life cycle, a description of roles and responsibilities of employees, contractors and service providers in relation to maintaining well integrity, appropriate to the relevant phases of the well life cycle.</li> <li>• Provide further advice to industry on the new terms in section 82(5) and has mapped requirements from the 2016 RMA Regulations to the 2025 RMA regulations.</li> <li>• Clarify that content described in one WOMP, once accepted, can be copied and reused in future WOMPs.</li> <li>• Where appropriate, content has been updated to remove ambiguity or conflicting statements.</li> </ul> <p>NOPSEMA also provides the following advice:</p> <ul style="list-style-type: none"> <li>• NOPSEMA has published a <a href="#">FAQ</a> which clarifies that ALARP and acceptability are separate tests. Currently, NOPSEMA considers acceptable levels of well integrity risk as meeting legislative requirements and alignment with Environment Plans and Safety Cases.</li> <li>• For organisations learning processes contained in titleholder's management systems, titleholders should consider providing a description of a structured process through which the titleholder captures and applies lessons from well operations to continuously improve and reduce risks to well integrity to ALARP.</li> <li>• NOPSEMA acknowledges that there are two guidance documents that address WOMP content and has committed to reviewing and streamlining the guidance material suite.</li> <li>• Section 78 allows for a titleholder to submit a WOMP that applies to specific well activities or to certain stages, with the written approval of NOPSEMA. Should titleholders wish to submit these types of WOMPs, early engagement is encouraged with NOPSEMA.</li> <li>• Section 83 requires titleholders to submit a revised WOMP to NOPSEMA when a revision is triggered, creating a positive obligation to do so. As the regulations do not define what constitutes a "significant" change under section 83(3), titleholders must have processes, systems, and criteria in place to determine when a revision is required.</li> <li>• NOPSEMA remains committed to continued engagement with industry and will consider all the feedback provided by industry as part of the ongoing review of NOPSEMA's Well Integrity guidance document suite.</li> </ul>

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Annual Well Integrity Report template	<p>Stakeholders sought clarification on the intent and application of the Annual Well Integrity Report template, including:</p> <ul style="list-style-type: none"> <li>• Whether use of the template is mandatory or if alternative formats may be submitted.</li> <li>• How reporting obligations apply where multiple WOMPs are in force for a single well or where activity-specific WOMPs exist.</li> <li>• Interpretation of specific fields in the template, including “final report” indicators, well status definitions, performance standards, and reporting of well integrity tests.</li> <li>• The extent of detail required and clarification on reporting well integrity testing, maintenance activities, deferred tests, and well barrier schematics.</li> <li>• Whether reporting could be aligned with existing calendar-year reporting cycles rather than WOMP acceptance dates.</li> <li>• Concerns regarding duplication of reporting, reporting burden, and alignment with existing titleholder systems.</li> <li>• Interaction with NOPSEMA’s CORE initiative and future digital reporting arrangements.</li> </ul>	<p>NOPSEMA has updated the Annual Well Integrity Report template to provide clarification that:</p> <ul style="list-style-type: none"> <li>• Use of the template is not mandatory; however, it is preferred as it provides information in a consistent format for review. Titleholders may submit information in alternative formats.</li> <li>• A report is required for each WOMP that is in force. Where multiple WOMPs apply to the same well, reporting obligations apply to each accepted WOMP.</li> <li>• Titleholders may reference performance standard documents rather than itemising all individual tests, and reporting may be undertaken by exception where criteria are not met.</li> <li>• Guidance has been provided to clarify the reporting of well status and well maintenance activities, and that only information in the RMS regulations needs to be provided in the annual well integrity report.</li> </ul> <p>NOPSEMA also provides the following advice in relation to the report template:</p> <ul style="list-style-type: none"> <li>• If a WOMP remains in force, an annual report is required until the WOMP is closed out in accordance with section 73(2) of the regulations.</li> <li>• For deferred tests, should titleholders liaise with their Well Integrity Focal Point to confirm the report contents.</li> <li>• Reporting must be submitted in accordance with regulatory timeframes, specifically within 14 days of the anniversary of acceptance of the relevant WOMP. The regulations do not provide discretion for alternative reporting cycles.</li> <li>• NOPSEMA has aligned the content of the report template with the requirements of the RMA Regulations. As part of the CORE program, NOPSEMA intends to progressively digitise reporting and leverage existing regulatory records to reduce duplication and reporting effort. Titleholders are encouraged to consider how their internal systems can align with future digital reporting arrangements.</li> </ul>