



Form 59

Rule 29.02(1)

Affidavit

Federal Court of Australia

No.

District Registry: Victoria

Division: Administrative and Constitutional Law and Human Rights

RAELENE COOPER

Applicant

NATIONAL OFFSHORE PETROLEUM SAFETY AND ENVIRONMENTAL MANAGEMENT AUTHORITY
and others

Respondents

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Affidavit of: **Jessica Louise Border**
 Address: Level 2, 37 St Georges Terrace, Perth WA 6000
 Occupation: Solicitor
 Date: 17 August 2023

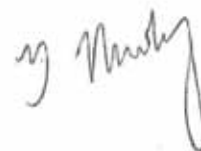
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Filed on behalf of Raelene Cooper, Applicant
 Prepared by Jessica Border
 Law firm Environmental Defenders Office
 Tel +61 8 6118 7919 Fax _____
 Email jessica.border@edo.org.au Ref _____
Address for Service **Environmental Defenders Office**, Suite 8.02 Level 8/6 O'Connell St, Sydney
 NSW 2000

[Form Approved 1 August 2011]

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6.	Document JLB-1.4, being a copy of Tables 5-3 and 5-4 of the Seismic Survey EP	10	1259
7.	Document JLB-1.5, being a copy of correspondence sent and received by EDO between 24 and 29 March 2023	11	1341
8.	Document JLB-1.6, being a copy of email from Woodside Energy to EDO dated 9 August 2023	13	1356
9.	Document JLB-1.7, being a copy of email and attached letter from EDO to NOPSEMA dated 9 August 2023	14	1364
10.	Document JLB-1.8, being a copy of an email and attached letter from EDO to Woodside Energy dated 10 August 2023	15	1367
11.	Document JLB-1.9, being a copy of an email and attached letter from EDO to NOPSEMA dated 10 August 2023	16	1371
12.	Document JLB-1.10, being a copy of an email from Woodside Energy to EDO dated 11 August 2023	17	1376
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15.	Document JLB-1.13, being a copy of a letter from EDO to Woodside Energy dated 14 August 2023	20	1384
16.	Document JLB-1.14, being a copy of an email from EDO to Woodside Energy dated 14 August 2023	21	1386
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18.	Document JLB-1.16, being a copy of an email and attached letter from NOPSEMA to EDO dated 14 August 2023	23	1395
19.	Document JLB-1.17, being a copy of an email from Woodside Energy to EDO dated 14 August 2023	24	1399
20.	Document JLB-1.18, being a copy of an email from Woodside Energy to EDO dated 14 August 2023	25	1404
21.	Document JLB-1.19, being a copy of an email and attached letter from EDO to Woodside Energy dated 15 August 2023	26	1410
22.	Document JLB-1.20, being a copy of an email from EDO to NOPSEMA dated 15 August 2023	27	1419
23.	Document JLB-1.21, being a copy of an email from Woodside Energy to EDO dated 16 August 2023	28	1425

I, Jessica Louise Border of Level 2, 37 St Georges Terrace in the State of Western Australia, Solicitor, affirm:

1. I am a Solicitor at the Environmental Defenders Office (**EDO**). I have worked as a lawyer for the EDO since 6 December 2022. Under the supervision of Clare Lakewood, Special Counsel, Safe Climate (Gas), EDO, the EDO acts for the Applicant (Ms Raelene Cooper) in this proceeding, and for Ms Cooper and Ms Josie Alec in respect of their dealings with Woodside Energy Group (**Woodside Energy**).
2. The contents of this affidavit are true and correct to the best of my knowledge or belief. Where information is not within my direct knowledge, I have stated the source of that information.
3. I have reviewed business records held by the EDO in relation to the matters the subject of this affidavit. Where I refer to email correspondence sent by or received from employees of the EDO, but have not been a named recipient to that correspondence, my knowledge of that correspondence comes from my review of those business records.
4. Where the notation [**JLB-1.#, p#**] appears in this affidavit, it refers to a document in the bundle which is now produced and shown to me at the time I affirm this affidavit, being a document marked **JLB-1.#** with the relevant page number, and a true copy of that document from **Annexure JLB-1** to this affidavit.

Acceptance with conditions of the Seismic Survey EP

5. On 17 August 2023 I reviewed the website of the First Respondent pertaining to the Scarborough 4D B1 Marine Seismic Survey (accessible at <https://info.nopsema.gov.au/activities/461/show_public>) (**NOPSEMA Website – Seismic Survey EP page**).

Attached marked **JLB-1.1, p 10** is a true copy of a screenshot of the NOPSEMA Website – Seismic Survey EP page as at 17 August 2023.

6. Published on NOPSEMA Website – Seismic Survey EP page is a copy of a document titled the Scarborough 4D B1 Marine Seismic Survey Environment Plan – Exploration – June 2023 – Rev 7 (**Seismic Survey EP**).

7. On 17 August 2023 I downloaded from that NOPSEMA Website – Seismic Survey EP page a copy of the Seismic Survey EP.

Attached marked **JLB-1.2, p 14** is a true copy of the Seismic Survey EP downloaded from that NOPSEMA Website – Seismic Survey EP page on 17 August 2023.

8. NOPSEMA Website – Seismic Survey EP page records that the Seismic Survey EP was "accepted with conditions and/or limitations" by the First Respondent on 31 July 2023 (**Acceptance**).




9. Published on NOPSEMA Website – Seismic Survey EP page is a copy of a document titled Statement of Reasons – Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environmental Plan (**Statement of Reasons**).

Attached marked **JLB-1.3, p 1210** is a true copy of the Statement of Reasons downloaded from that NOPSEMA Website – Seismic Survey EP page on 17 August 2023.

“Relevant Persons” for the purpose of the Seismic Survey EP

10. I have reviewed:
- (a) the Statement of Reasons, including the condition at paragraph 133(1) of the Acceptance requiring Woodside Energy to consult with persons or organisations identified as a relevant person in relation to First Nations cultural heritage in Tables 5-3 and 5-4 of the Seismic Survey EP; and
 - (b) Tables 5-3 and 5-4 of the Seismic Survey EP (the Seismic Survey EP being JLB-1.2) refer to Save Our Songlines and two other individuals whose names are redacted at page 66 (Table 5-3) and pages 185 to 191 (Table 5-4) of the Seismic Survey EP.

For convenience, attached and marked **JLB-1.4, p 1259** is a true copy of Tables 5-3 and 5-4 of the Seismic Survey EP.

11. I infer, based on the history of communications between Ms Cooper, Ms Alec and Woodside Energy that the names redacted are the names of Ms Alec and Ms Cooper. I draw that inference on the basis of my review of the primary email correspondence between Woodside Energy and Ms Alec and Ms Cooper, to which EDO was a party, and a comparison of that correspondence with what is recorded in the Seismic Survey EP. By way of example, the correspondence sent and received by EDO on behalf of Ms Alec and Ms Cooper on 24 and 29 March 2023 is, in substance, the same as the correspondence recorded in the Seismic Survey EP at pages 188 to 189 as having been sent and received by EDO, on those same dates, on behalf of the persons whose names are redacted.

Attached and marked **JLB-1.5, p 1341** is a true copy of the correspondence sent and received by EDO, on behalf of Ms Alec and Ms Cooper, on 24 and 29 March 2023.

12. The Applicant (with Ms Alec) is a co-founder of Save Our Songlines, an unincorporated entity established in or around February 2022 dedicated to protection of Country, especially Murujuga, from industry which may damage it, and the cultural heritage connected to it, including the Songlines connected to it.

Notification from Woodside Energy of intention to commence activities

13. On 9 August 2023 at 6:55pm, I received an email from Woodside Energy informing EDO to the effect that it intended to commence activities the subject of the Seismic Survey EP on 12 August 2023 [**JLB-1.6, p 1356**].




14. On Wednesday 9 August 2023 at 11:12pm the EDO sent a letter by email to NOPSEMA to notify NOPSEMA of Woodside Energy's intention to commence activities and to ask that NOPSEMA take action to prevent the foreshadowed breach of the conditions in the Acceptance **[JLB-1.7, p 1364]**.
15. On 10 August 2023 at 6:25pm the EDO sent a letter by email to Woodside Energy to advise that Ms Alec, Ms Cooper and Save Our Songlines:
- (a) did not consider that Woodside Energy's interactions with them constitute satisfaction of the consultation conditions in the Seismic Survey EP;
 - (b) considered that the Acceptance is invalid, and provided reasons for that position.

[JLB-1.8, p 1367].

16. On Thursday, 10 August 2023 at 6:27pm the EDO sent a letter by email to NOPSEMA to advise that Ms Alec, Ms Cooper and Save Our Songlines:
- (a) have further information they wish to provide on cultural features and heritage values of the environment that might be affected by the activity subject of the Seismic Survey EP, and has not been given the opportunity to do this by the titleholder;
 - (b) considered that the Acceptance is invalid; and
 - (c) requested that NOPSEMA take immediate regulatory action to prevent Woodside Energy from commencing any activity under the Seismic Survey EP at any time prior to full consultation.

[JLB-1.9, p 1371].

17. On Friday 11 August 2023 at 10:03am, EDO received an email from Woodside Energy confirming that 'activity will not commence under the Seismic Survey EP on 12 August 2023' **[JLB-1.10, p 1376]**.
18. On Friday 11 August 2023 at 12:13pm, EDO emailed Woodside Energy seeking:
- (a) a written undertaking that no activity under the Seismic Survey EP will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete; alternatively,
 - (b) an undertaking that Woodside Energy not commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023

[JLB-1.11, p 1378].

19. On Friday 11 August 2023 at 12:18pm, Woodside Energy gave an undertaking that it would not commence under the Seismic Survey EP prior 10am AEST (8am WST) on 15 August 2023 **[JLB-1.12, p 1381]**.

20. On Monday 14 August 2023 at 11:51am, EDO sent a letter by email to Woodside Energy seeking:
- (a) an undertaking that no activity under the Seismic Survey EP will commence before the consultation process referred to in the conditions of the Acceptance is complete and that Woodside give 48 hours notice before activities commence; alternatively
 - (b) a further undertaking that Woodside would not commence activities until Thursday 17 August 2023.

[JLB-1.13, p 1384].

21. On Monday 14 August 2023 at 12:15pm EDO emailed Woodside Energy to clarify that the further undertaking was to not commence activities until 12 noon AEST on Thursday 17 August 2023.

[JLB-1.14, p 1386]

22. On Monday 14 August 2023 at 1:38pm, Ms Syminton wrote to EDO confirming that no activity would take place under the seismic EP in the next 48 hours **[JLB-1.15, p 1391].**

23. On Monday 14 August 2023 at 3:19pm NOPSEMA sent a letter to EDO by email referring to NOPSEMA's publicly available brochure on inspections and noting that it did not accept that its Acceptance was invalid **[JLB-1.16, p 1395].**

24. On Monday 14 August 2023 at 6:57pm, Ms Syminton wrote to EDO to reiterate that no activity would take place under the seismic EP until 2:00pm on Wednesday 16 August and confirm that Woodside Energy would respond to EDO's 10 August letter by Wednesday morning **[JLB-1.17, p 1399].**

25. On Tuesday 15 August 2023 at 1:52pm, Ms Syminton wrote to EDO to provide a further update and stated that that no activity would take place under the Seismic Survey EP before Friday 12pm Perth time, and noted that Woodside Energy anticipated providing a response to EDO's 10 August 2023 letter by Friday morning **[JLB-1.18, p 1404].**


26. On Tuesday 15 August 2023 at 5:47pm EDO sent a letter by email to Woodside Energy setting out the correspondence between the parties from 9 August 2023 and noting that EDO would commence proceedings on behalf of the Applicant if Woodside Energy did not give an undertaking not to commence activities until consultation was completed **[JLB-1.19, p 1410].**

27. On Tuesday 15 August 2023 at 5:57pm the EDO wrote to NOPSEMA reiterating its clients' position that NOPSEMA had given no indication of the action it was taking in relation to Woodside Energy's breach and noting that EDO would commence proceedings on behalf of the Applicant if Woodside Energy did not give an undertaking not to commence activities until consultation was completed. **[JLB-1.20, p 1419]**

28. On Wednesday 16 August 2023 at 2:50pm Ms Syminton wrote to EDO stating that the matters raised in EDO's 10 August letter 'are serious and require coordinated instructions', and confirming that no activity would take place under the seismic EP before 2pm Wednesday 23 August (Perth time). **[JLB-21, p 1425].**




Affirmed by the deponent Jessica)
Louise Border at)
in Perth)
on 17 August 2023)
Before me:


.....
Signature of deponent


.....
Signature of witness

Name of witness: TIMOTHY JAMES MACKINAY

Qualification of witness: Lawyer

Schedule

Federal Court of Australia

No.

District Registry: Victoria

Division: Administrative and Constitutional Law and Human Rights

Respondents

Second Respondent:

WOODSIDE ENERGY SCARBOROUGH PTY LTD
ACN 650 177 227

Third Respondent:

WOODSIDE ENERGY (AUSTRALIA) PTY LTD
ACN 006 923 879

Date:

2023

Certificate of Annexure

Federal Court of Australia

No.

District Registry: Victoria

Division: Administrative and Constitutional Law and Human Rights


RAELENE COOPER

Applicant

**NATIONAL OFFSHORE PETROLEUM SAFETY AND ENVIRONMENTAL MANAGEMENT AUTHORITY
and others**

Respondents

This is the annexure marked **JLB-1** produced and shown to Jessica Louise Border at the time of affirming her affidavit 17 August 2023.


.....
TIMOTHY JAMES MACKINNON, LAWYER



NOPSEMA
Australia's offshore energy regulator

JLB-1.1

(<https://nopsema.gov.au>).



Activity - Scarborough 4D B1 Marine Seismic Survey

Subscribe (/subscriptions/new?subscription%5Btopic_id%5D=461&subscription%5Btopic_type%5D=Activity)

Activity details

Organisation	Woodside Energy Scarborough Pty Ltd
Project	
Activity types	Seismic survey
In-force EP	6780
Submission date	11 October, 2021
Outcome	Accepted with conditions and/or limitations
Acceptance date	31 July, 2023
Locations	North West

Start date	10 August, 2023
Stop date	Pending titleholder notification
Lifecycle Classification	Exploration

Please note: activity start and stop dates are based on notifications provided by the titleholder.

Titleholder contact

Project Manager

Email feedback@woodside.com.au (<mailto:feedback@woodside.com.au>)

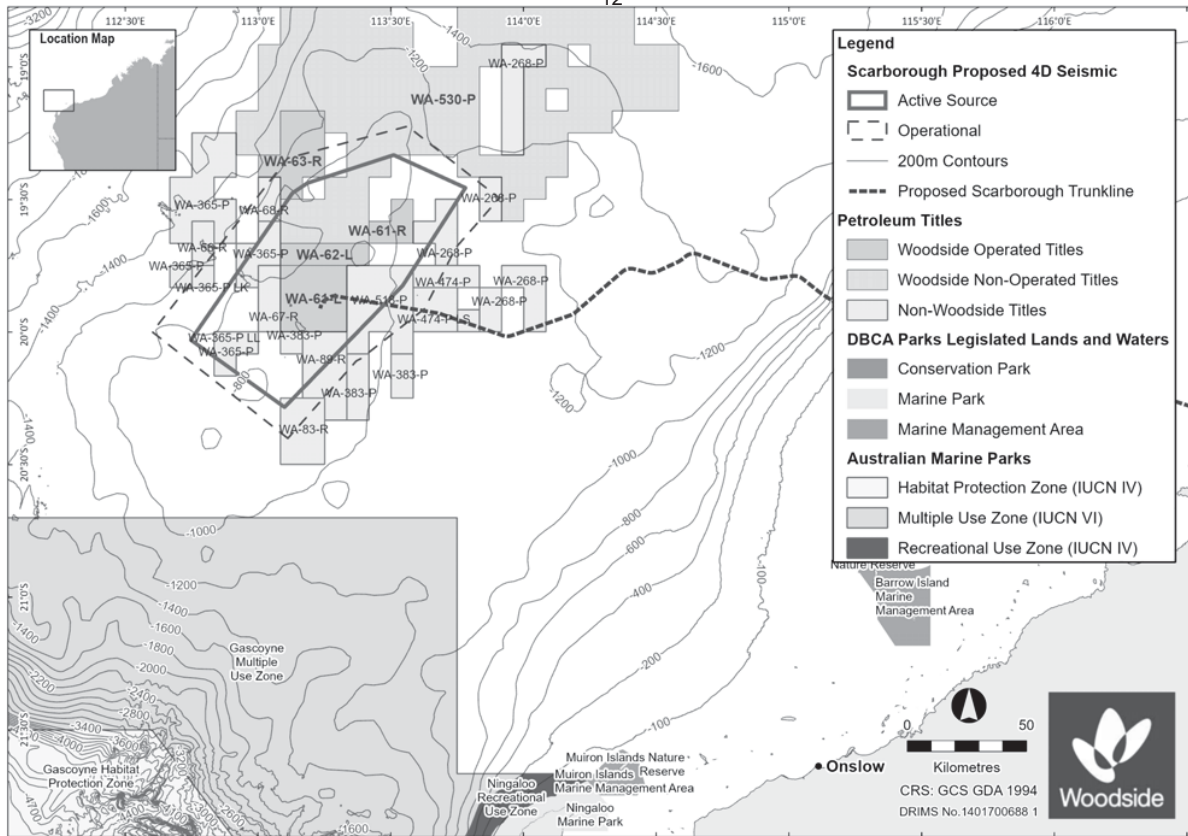
Phone: 0893484000

Activity Description

Woodside proposes to conduct a four-dimensional (4D) baseline (B1) marine seismic survey (MSS) over the Scarborough, North Scarborough and Jupiter gas fields within Commonwealth waters, located in the Carnarvon Basin. The proposed activity will occur within Woodside's Permit Areas WA-61-L, WA-62-L, WA-61-R, WA-63-R, as well as surrounding permit areas WA-530-P, WA-66-R, WA-67-R, WA-68-R, WA-83-R, WA-89-R, WA-268-P, WA-365-P, WA-365-P LL, WA-365-P LK, WA-383-P, WA-474-P, WA-474-P LS, WA-518-P, gazettal block W19-35 and WA-61-R in the Jupiter field. The survey is part of an appraisal program for reservoir management and will provide an uplift in seismic imaging for the Scarborough field from the 2004 vintage seismic data (HEX-003).

The planned duration for the survey is 80 days commencing after the approval date of the EP and will be completed by 31 December 2023. The extend of the Active Source Area is approximately 5650 km². The extent of the operational area is approximately 9200 km². Water depths within the Active Source Area and Operational Area range from ~800m to 1150m. The Operational Area is approximately 201 km WNW of the Montebello Islands and Barrow Island, 188km north-west of North-west Cape and 245km north-west of Onslow and 167km NW of the Ningaloo Coast World Heritage Property.

Location map (click to enlarge)



(<https://docs.nopsema.gov.au/A814955>).

Accepted EP Documents

EP Document [A941007 \(https://docs.nopsema.gov.au/A941007\)](https://docs.nopsema.gov.au/A941007). (40.2 MB)
(<https://docs.nopsema.gov.au/A941007>).

Statement of reasons [A855184 \(https://docs.nopsema.gov.au/A855184\)](https://docs.nopsema.gov.au/A855184). (999 KB)
(<https://docs.nopsema.gov.au/A855184>).

Related EP assessments

[6780 \(Click to view\) \(/environment_plans/559/show_public\)](/environment_plans/559/show_public).

[Back \(/home/approved_projects_and_activities\)](/home/approved_projects_and_activities)

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**National Offshore Petroleum Safety and Environmental
Management Authority (<https://www.nopsema.gov.au>)**

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Scarborough 4D B1 Marine Seismic Survey Environment Plan

Exploration

June 2023

Rev 7

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1 INTRODUCTION

1.1 Overview

Woodside Energy Scarborough Pty Ltd. (Woodside), as Titleholder under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Commonwealth) (referred to as the Environment Regulations), proposes to undertake a three-dimensional (3D) marine seismic survey (MSS) within the Northern Carnarvon Basin on the Exmouth Plateau in Petroleum titles WA-63-R, WA-61-L, WA-62-L and WA-61-R. These activities as described in Section 3 will hereafter be referred to as the Petroleum Activities Program.

This EP has been prepared to meet the Environment Regulations, as administered by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA).

1.2 Purpose of the Environment Plan

In accordance with the objectives of the Environment Regulations, the purpose of this EP is to demonstrate that:

- The potential environmental impacts and risks (planned (routine and non-routine) and unplanned) that may result from the Petroleum Activities Program are identified.
- Appropriate management controls are implemented to reduce impacts and risks to a level that is 'as low as reasonably practicable' (ALARP) and acceptable.
- The Petroleum Activities Program is carried out in a manner consistent with the principles of ecologically sustainable development (ESD) (as defined in Section 3A of the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)).

This EP describes the process and resulting outputs of the risk assessment, whereby impacts and risks are managed accordingly.

The EP defines activity-specific environmental performance outcomes (EPOs), environmental performance standards (EPSs) and measurement criteria (MC). These form the basis for monitoring, auditing and managing the Petroleum Activities Program to be performed by Woodside and its contractors. The implementation strategy (derived from the decision support framework tools) specified within this EP provides Woodside and NOPSEMA with the required level of assurance that impacts and risks associated with the activity are reduced to ALARP and are acceptable.

1.3 Scope of the Environment Plan

The scope of this EP covers the activities that define the Petroleum Activities Program, as described in **Section 3**. The spatial boundary of the Petroleum Activities Program has been described and assessed using the Operational Area. The Operational Area defines the spatial boundary of the Petroleum Activities Program, and is further described in **Section 3.3**.

This EP addresses potential environmental impacts from planned activities and any potential unplanned risks that originate from within the Operational Area. Transit to and from the Operational Area by vessels associated with the Petroleum Activities Program and support vessels, as well as port activities associated with these vessels, are not within the scope of this EP. Vessels supporting the Petroleum Activities Program operating outside the Operational Area (e.g. transiting to and from port) are subject to applicable maritime regulations and other requirements and are not managed by this EP.

1.4 Environment Plan Summary

An EP summary is provided in **Table 1-1** as required by Regulation 11(4).

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Table 1-1: EP summary

EP summary material requirement	Section of EP
The location of the activity	Section 3.3
A description of the receiving environment	Section 4
A description of the activity	Section 3
Details of the environmental impacts and risks	Section 6
The control measures for the activity	Section 6
The arrangements for ongoing monitoring of the titleholder's environmental performance	Section 7.5
Response arrangements in the oil pollution emergency plan	Section 7.10
Consultation already undertaken and plans for ongoing consultation	Section 5
Details of the titleholder's nominated liaison person for the activity	Section 1.7.2

1.5 Structure of the Environment Plan

The EP has been structured to reflect the process and requirements of the Environment Regulations, as outlined in **Table 1-2**.

Table 1-2: EP process phases, applicable Environment Regulations and relevant section of EP

Criteria for acceptance	Content requirements/relevant regulations	Elements	Section of EP
Regulation 10A(a): <i>is appropriate for the nature and scale of the activity</i>	Regulation 13: <i>Environmental Assessment</i> Regulation 14: <i>Implementation strategy for the environment plan</i> Regulation 16: <i>Other information in the environment plan</i>	The principle of 'nature and scale' applies throughout the EP	Section 2 Section 3 Section 4 Section 5 Section 6 Section 7
Regulation 10A(b): <i>demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable</i>	Regulation 13(1)–13(7): <i>13(1) Description of the activity</i> <i>13(2)(3) Description of the environment</i> <i>13(4) Requirements</i> <i>13(5)(6) Evaluation of environmental impacts and risks</i> <i>13(7) Environmental performance outcomes and standards</i>	Set the context (activity and existing environment) Define 'acceptable' (the requirements, the corporate policy, relevant persons) Detail the impacts and risks Evaluate the nature and scale Detail the control measures – ALARP and acceptable	Section 1 Section 2 Section 3 Section 4 Section 5 Section 6 Section 7
Regulation 10A(c): <i>demonstrates that the environmental impacts and risks of the activity will be of an acceptable level</i>	Regulation 16(a)–16(c): <i>A statement of the titleholder's corporate environmental policy</i> <i>A report on all consultations between the titleholder and any relevant person</i>		
Regulation 10A(d): <i>provides for appropriate environmental performance outcomes, environmental</i>	Regulation 13(7): <i>Environmental performance outcomes and standards</i>	Environmental Performance Outcomes (EPOs) Environmental Performance Standards (EPSs) Measurement Criteria (MC)	Section 6

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Criteria for acceptance	Content requirements/relevant regulations	Elements	Section of EP
<i>performance standards and measurement criteria</i>			
Regulation 10A(e): <i>includes an appropriate implementation strategy and monitoring, recording and reporting arrangements</i>	Regulation 14: <i>Implementation strategy for the environment plan</i>	Implementation strategy, including: <ul style="list-style-type: none"> • systems, practices and procedures • performance monitoring • Oil Pollution Emergency Plan (OPEP) and scientific monitoring • ongoing consultation. 	Section 7 Appendix D
Regulation 10A(f): <i>does not involve the activity or part of the activity, other than arrangements for environmental monitoring or for responding to an emergency, being undertaken in any part of a declared World Heritage property within the meaning of the EPBC Act</i>	Regulation 13 (1)–13(3): <i>13(1) Description of the activity</i> <i>13(2) Description of the environment</i> <i>13(3) Without limiting [Regulation 13(2)(b)], particular relevant values and sensitivities may include any of the following:</i> <i>(a) the world heritage values of a declared World Heritage property within the meaning of the EPBC Act;</i> <i>(b) the national heritage values of a National Heritage place within the meaning of that Act;</i> <i>(c) the ecological character of a declared Ramsar wetland within the meaning of that Act;</i> <i>(d) the presence of a listed threatened species or listed threatened ecological community within the meaning of that Act;</i> <i>(e) the presence of a listed migratory species within the meaning of that Act;</i> <i>(f) any values and sensitivities that exist in, or in relation to, part or all of:</i> <i>(i) a Commonwealth marine area within the meaning of that Act; or</i> <i>(ii) Commonwealth land within the meaning of that Act.</i>	No activity, or part of the activity, undertaken in any part of a declared World Heritage property	Section 3 Section 4 Section 6
Regulation 10A(g): <i>(i) the titleholder has carried out the consultations required by Division 2.2A</i> <i>(ii) the measures (if any) that the titleholder has adopted, or proposes to adopt,</i>	Regulation 11A: <i>Consultation with relevant authorities, persons and organisations, etc.</i> Regulation 16(b): <i>A report on all consultations between the titleholder and any relevant person</i>	Consultation in preparation of the EP	Section 5

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Criteria for acceptance	Content requirements/relevant regulations	Elements	Section of EP
<i>because of the consultations are appropriate</i>			
Regulation 10A(h): <i>complies with the Act and the regulations</i>	Regulation 15: <i>Details of the Titleholder and liaison person</i> Regulation 16(c): <i>Details of all reportable incidents in relation to the proposed activity.</i>	All contents of the EP must comply with the Offshore Petroleum and Greenhouse Gas Storage Act 2006 and the Environment Regulations	Section 1.5 Section 6.7

1.6 Description of the Titleholder

Woodside is the Titleholder for this activity, on behalf of a Joint Venture comprising Woodside Energy Scarborough Pty Ltd and Woodside Energy (Australia) Pty Ltd.

Woodside is Australia's leading natural gas producer. Woodside's operations are characterised by strong safety and environmental performance in remote and challenging locations. Wherever Woodside works, it is committed to living its values of integrity, respect, working together ownership, sustainability and courage.

Through collaboration, Woodside leverages its capabilities to progress its growth strategy. Since 1984, the company has been operating the landmark Australian project, the North West Shelf, which is one of the world's premier liquefied natural gas (LNG) facilities. In 2012, Woodside added the Pluto LNG Plant to its onshore operating facilities.

Woodside has an excellent track record of efficient and safe production. Woodside strives for excellence in safety and environmental performance and continues to strengthen relationships with customers, partners, co-venturers, governments, and communities. Further information about Woodside can be found at <http://www.woodside.com.au>.

1.7 Details of Titleholder and Public Affairs Contact

In accordance with Regulation 15 of the Environment Regulations, details of the titleholder, liaison person and arrangements for the notification of changes are described below.

1.7.1 Titleholder

Woodside Energy Scarborough Pty Ltd
11 Mount Street
Perth, Western Australia
T: 08 9348 4000
ACN: 650 177 227

1.7.2 Nominated Liaison Person

Ryan Felton
Senior Corporate Affairs Adviser
11 Mount Street
Perth, Western Australia
Telephone: 08 9348 4000
Email: feedback@woodside.com.au

1.7.3 Arrangement for Notifying Change

Should the titleholder, titleholder's nominated liaison person, or the contact details for either change, NOPSEMA will be notified in writing within two weeks or as soon as practicable.

1.7.4 Offshore Petroleum and Greenhouse Gas Storage Act

The OPGGS Act controls exploration and production activities beyond three nautical miles (nm) of the mainland (and islands) to the outer extent of the Australian Exclusive Economic Zone (EEZ) at 200 nm.

1.8 Woodside Management System

The Woodside Management System (WMS) provides a structured framework of documentation to set common expectations governing how all employees and contractors at Woodside will work. Many of the standards presented in **Section 6** are drawn from the WMS documentation, which comprises four elements: compass and policies, expectations, processes and procedures, and guidelines, as outlined below (and illustrated in **Figure 1-1**).

- **Compass and Policies:** Set the enterprise-wide direction for Woodside by governing our behaviours, actions, and business decisions and ensuring we meet our legal and other external obligations.
- **Expectations:** Set essential activities or deliverables required to achieve the objectives of the Key Business Activities and provide the basis for developing processes and procedures.
- **Processes and Procedures:** Processes identify the set of interrelated or interacting activities that transform inputs into outputs, to systematically achieve a purpose or specific objective. Procedures specify what steps, by whom, and when required to carry out an activity or a process.
- **Guidelines:** Provide recommended practice and advice on how to perform the steps defined in Procedures, together with supporting information and associated tools. Guidelines provide advice on how activities or tasks may be performed, information that may be taken into consideration, or, how to use tools and systems.



Figure 1-1: The four major elements of the WMS Seed

The WMS is organised within a business process hierarchy based upon key business activities to ensure the system remains independent of organisation structure, is globally applicable and scalable wherever required. These key business activities are grouped into management, support, and value

stream activities as shown in **Figure 1-2**. The value stream activities capture, generate and deliver value through the exploration and production lifecycle. The management activities influence all areas of the business, while support activities may influence one or more value stream activities.

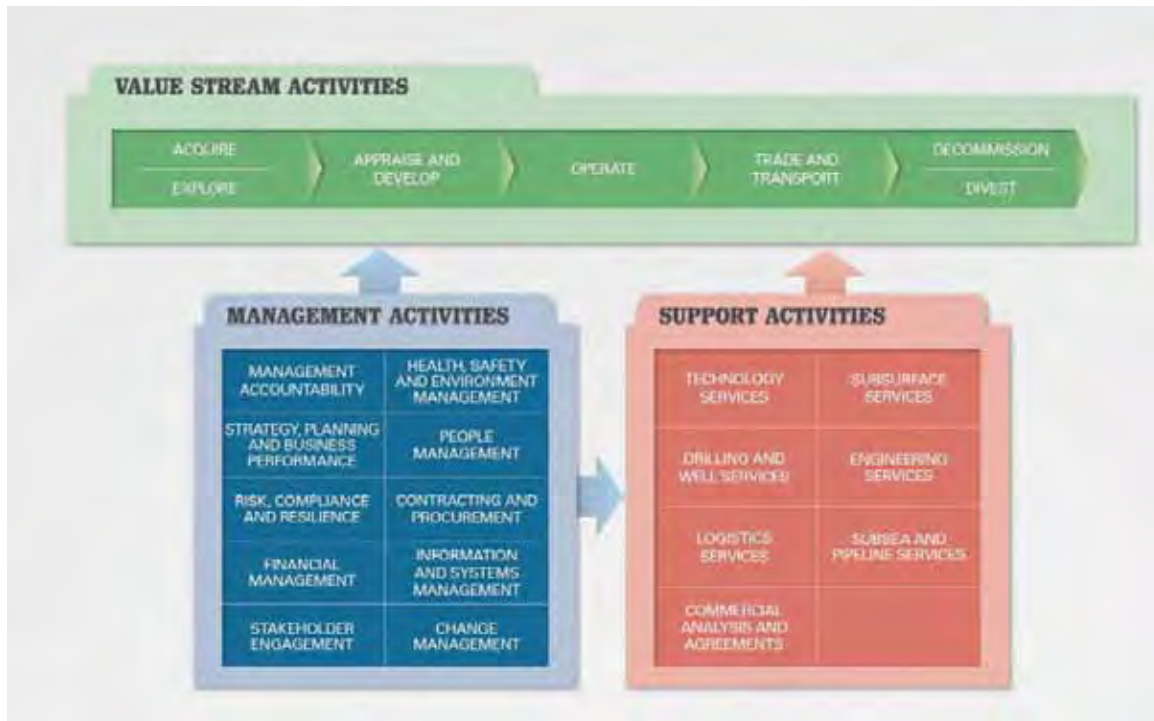


Figure 1-2: The WMS business process hierarchy

1.8.1 Health, Safety and Environment

In accordance with Regulation 16(a) of the Environment Regulations, Woodside's Corporate Environment and Biodiversity Policy is provided in **Appendix A** of this EP.

1.9 Description of Relevant Requirements

In accordance with Regulation 13(4) of the Environment Regulations, a description of requirements, including legislative requirements, that apply to the activity and are relevant to managing risks and impacts of the Petroleum Activities Program are detailed in **Appendix B**. This EP will not be assessed under the WA Environment Protection Act 1986 as the activity does not occur on State land or within State waters.

1.9.1 Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009

The Environment Regulations apply to petroleum activities in Commonwealth waters and are administered by NOPSEMA. The objective of the Environment Regulations is to ensure petroleum activities are:

- carried out in a manner consistent with the principles of ecological sustainable development
- carried out in a manner by which the environmental impacts and risks of the activity will be reduced to ALARP
- carried out in a manner by which the environmental impacts and risks of the activity will be of an acceptable level.

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1.9.2 Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The EPBC Act aims to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places in Australia. These are defined in the Act as Matters of National Environmental Significance (MNES). In respect to offshore petroleum activities in Commonwealth waters, these requirements are implemented by NOPSEMA through the Streamlining Offshore Petroleum Environmental Approvals Program (the Program). The Program provides for the protection of the environment by requiring all offshore petroleum activities authorised by the OPGGS Act to be conducted in accordance with an accepted EP, consistent with the principles of Ecological Sustainable Development (ESD).

Impacts on the environment include those matters protected under Part 3 of the EPBC Act. The definition of 'environment' in the Program is consistent with that used in the EPBC Act - this enables the Program to encompass all matters protected under Part 3 of the EPBC Act.

1.9.2.1 Recovery Plans and Threat Abatement Plans

Under s139(1)(b) of the EPBC Act, the Environment Minister must not act inconsistently with a recovery plan for a listed threatened species or ecological community or a threat abatement plan for a species or community protected under the Act. Similarly, under s268 of the EPBC Act:

“A Commonwealth agency must not take any action that contravenes a recovery plan or a threat abatement plan.”

In respect to offshore petroleum activities in Commonwealth waters, these requirements are implemented by NOPSEMA via the commitments included in the Program. Commitments relating to listed threatened species and ecological communities under the Act are included in the Program Report (Commonwealth of Australia, 2014).

1.9.2.2 Australian Marine Parks

Under the EPBC Act, Australian Marine Parks (AMPs), formally known as Commonwealth Marine Reserves, are recognised for conserving marine habitats and the species that live and rely on these habitats. The Director of National Parks (DNP) is responsible for managing AMPs (supported by Parks Australia), and is required to publish management plans for them. Other parts of the Australian Government must not perform functions or exercise powers relating to these parks that are inconsistent with management plans (s362 of the EPBC Act). Relevant AMPs are described in **Section 4.9**. The North-west Marine Parks Network Management Plan (DNP, 2018a) and the South west Marine Parks Network Management Plan (DNP, 2018b) describe the requirements for managing the marine parks that are relevant to this EP.

Specific zones within the AMPs have been allocated conservation objectives as stated below (International Union for Conservation of Nature (IUCN) Protected Area Category) based on the Australian IUCN reserve management principles outlined in Schedule 8 of the EPBC Regulations 2000:

- Special Purpose Zone (IUCN category VI) – managed to allow specific activities through special purpose management arrangements while conserving ecosystems, habitats and native species. The zone allows or prohibits specific activities.
- Sanctuary Zone (IUCN category Ia) – managed to conserve ecosystems, habitats and native species in as natural and undisturbed a state as possible. The zone allows only authorised scientific research and monitoring.
- National Park Zone (IUCN category II) – managed to protect and conserve ecosystems, habitats and native species in as natural a state as possible. The zone only allows non extractive activities unless authorised for research and monitoring.

- Recreational Use Zone (IUCN category IV) – managed to allow recreational use, while conserving ecosystems, habitats and native species in as natural a state as possible. The zone allows for recreational fishing, but not commercial fishing.
- Habitat Protection Zone (IUCN category IV) – managed to allow activities that do not harm or cause destruction to seafloor habitats, while conserving ecosystems, habitats and native species in as natural a state as possible.
- Multiple Use Zone (IUCN category VI) – managed to allow ecologically sustainable use while conserving ecosystems, habitats and native species. The zone allows for a range of sustainable uses, including commercial fishing and mining, where they are consistent with park values.

1.9.2.3 World Heritage Properties

Australian World Heritage management principles are prescribed in Schedule 5 of the EPBC Regulations 2000. No management principles are considered relevant to the scope of this EP given there is no potential impacts to any of these areas.

2 ENVIRONMENT PLAN PROCESS

2.1 Overview

This section outlines the process that Woodside follows to prepare the EP once an activity has been defined as a petroleum activity (refer to **Section 1.1**). This includes a description of the environmental risk management methodology that is used to identify, analyse and evaluate risks to meet ALARP and acceptability requirements and to develop EPOs and EPSs. This section also describes Woodside's risk management methodologies applicable to implementation strategies applied during the activity.

Regulation 13(5) of the Environment Regulations requires environmental impacts and risks of the Petroleum Activities program to be detailed and evaluated appropriate to the nature and scale of each impact and risk associated with the Petroleum Activities Program and potential emergency conditions. The objective of the risk assessment process, described in this section, is to identify the risks and associated impacts of an activity so they can be assessed, appropriate control measures applied to eliminate, control or mitigate the impact or risk to ALARP, then determine if the impact or risk level is acceptable.

Environmental impacts and risks include those directly and indirectly associated with the Petroleum Activities Program and include potential emergency and accidental events. This may include environment impacts and risks that are a result of the proposed activity but are not within Woodside's control.

- Planned activities (routine and non-routine) have the potential for inherent environmental impacts.
- Environmental risks are unplanned events with the potential for impact (termed risk 'consequence').

Herein, potential impact from planned activities are termed 'impacts', and 'risks' are associated with unplanned events with the potential for impact (should the risk be realised), with such impacts termed potential 'consequence'.

2.2 Environmental Risk Management Methodology

Woodside recognises that risk is inherent to its business and effectively managing risk is vital to delivering on company objectives, success and continued growth. Woodside is committed to managing all risks proactively and effectively. The objective of Woodside's risk management system is to provide a consistent process for recognising and managing risks across its business. Achieving this objective includes ensuring risks consider impacts across the key areas of exposure: health and safety, environment, finance, reputation and brand, legal and compliance, and social and cultural. A copy of Woodside's Risk Management Policy is provided in **Appendix A**.

The environmental risk management methodology used in this EP is based on Woodside's Risk Management Procedure. This procedure aligns to industry standards such as international standard ISO 31000:2018. The WMS risk management procedure, guidelines and tools provide guidance on specific techniques for managing risk, tailored for particular areas of risk within certain business processes. Procedures applied for environmental risk management include:

- Health Safety and Environment Management Procedure
- Impact Assessment Procedure
- Process Safety Management Procedure.

The risk management methodology provides a framework to demonstrate that the risks and impacts are continually identified, reduced to ALARP and assessed to be at an acceptable level, as required by the Environment Regulations. The key steps of Woodside's Risk Management Process are shown

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in **Figure 2-1**. Each step and how it is applied to the scopes of this activity is described in **Sections 2.3 to 2.12**.



Figure 2-1: Woodside’s risk management process

2.2.1 Healthy, Safety and Environment Management Procedure

Woodside’s Health, Safety and Environment Management Procedure provides the structure for managing health, safety and environment (HSE) risks and impacts across Woodside. It defines the decision authorities for company-wide HSE management activities and deliverables, and to support continuous improvement in HSE management.

2.2.2 Impact Assessment Procedure

To support effective environmental risk assessment, Woodside’s Impact Assessment Procedure (**Figure 2-2**) provides the steps needed to meet required environment, health and social standards by ensuring impacts are assessed appropriate to the nature and scale of the activity, the regulatory context, the receiving environment, interests, concerns and rights of stakeholders, and the applicable framework of standards and practices.

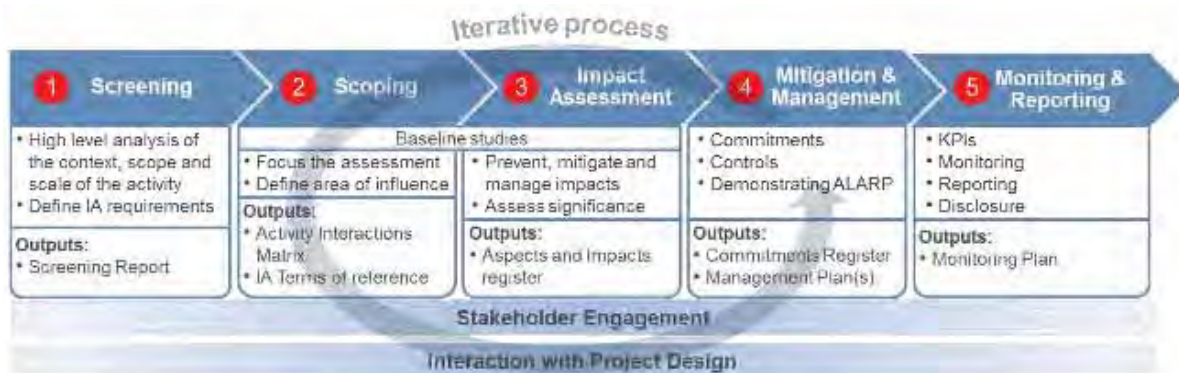


Figure 2-2: Woodside’s impact assessment process

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2.3 Environmental Plan Process

Figure 2-3 illustrates the EP development process. Each element of this process is discussed further in Sections 2.3 to 2.12.

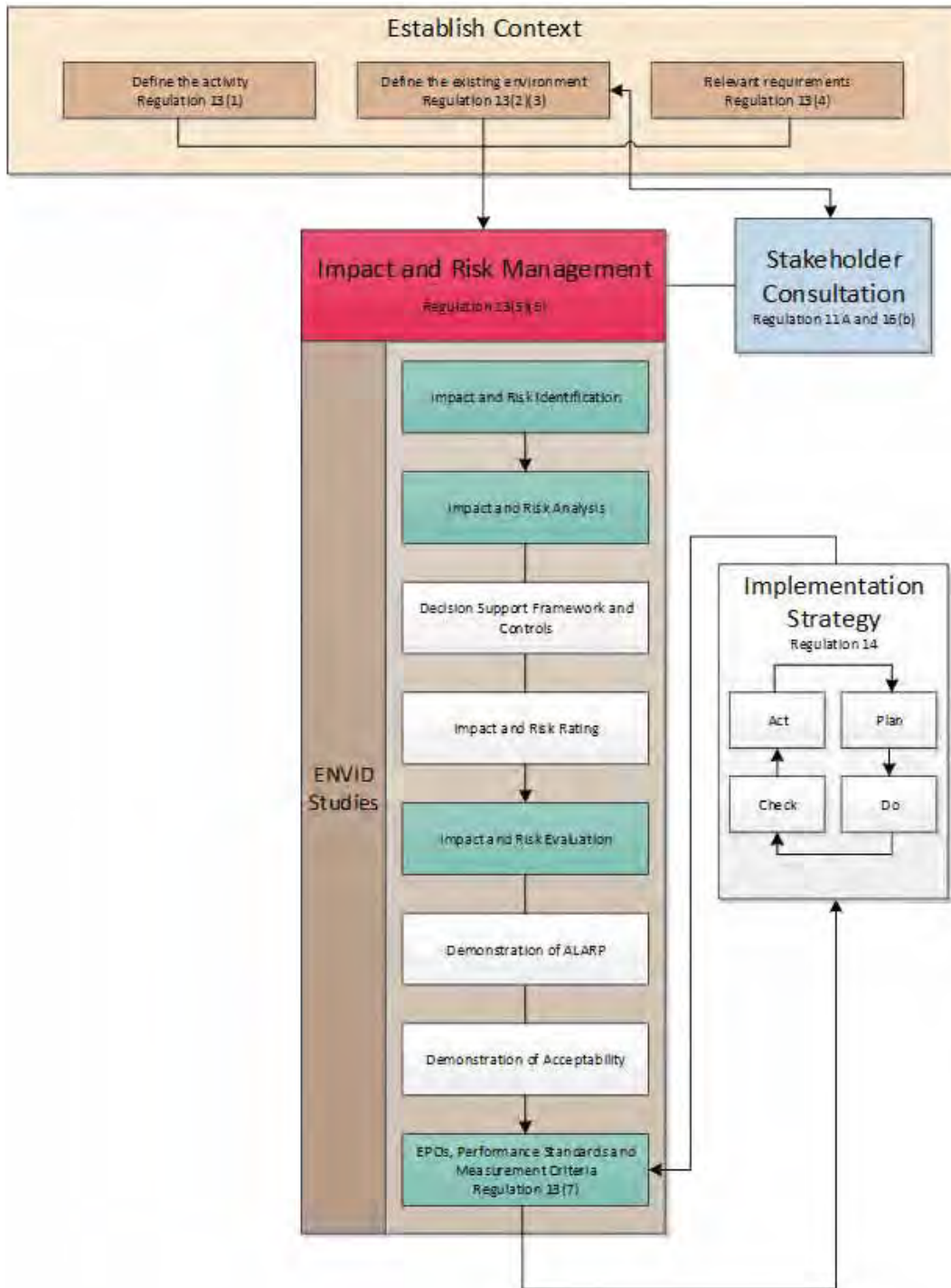


Figure 2-3: Environment Plan development process

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2.4 Establish the Context

2.4.1 Define the Activity

This first stage involves evaluating whether the activity meets the definition of a ‘petroleum activity’ as defined in the Environment Regulations.

The activity is then described in relation to:

- the location
- what is to be performed
- how it is planned to be performed, including outlining operational details of the activity, and proposed timeframes.

The ‘what’ and ‘how’ are described in the context of ‘environmental aspects’ to inform the risk and impact assessment for planned (routine and non-routine) and unplanned (accidents, incidents and emergency conditions) activities.

The activity is described in **Section 3** and referred to as the Petroleum Activities Program.

2.4.2 Defining the Existing Environment

The context of the existing environment is described and determined by considering the nature and scale of the activity (size, type, timing, duration, complexity, and intensity of the activity), as described in **Section 3**. The purpose is to describe the existing environment that may be impacted by the activity, directly or indirectly, by planned or unplanned events.

The existing environment section (**Section 4**) is structured to define the physical, biological, socio economic and cultural attributes of the area of interest, in accordance with the definition of ‘environment’ in Regulation 4(a) of the Environment Regulations. These sub-sections make particular reference to:

- The environmental, and social and cultural consequences as defined by Woodside (refer to **Table 2-1**), which address key physical and biological attributes, as well as social and cultural values of the existing environment. These consequence definitions are applied to the impact and risk analysis (refer **Section 2.6.2**) and rated for all planned and unplanned activities. Additional detail is provided for evaluating unplanned hydrocarbon spill risk.
- EPBC Act Matters of National Environmental Significance (MNES), including listed threatened species and ecological communities and listed migratory species. Defining the spatial extent of the existing environment is guided by the nature and scale of the Petroleum Activities Program (and associated sources of environmental risk). This considers the Operational Area and wider environment that may be affected (EMBA), as determined by the hydrocarbon spill risk assessments presented in **Section 6.7.1**. MNES, as defined within the EPBC Act, are addressed through Woodside’s impact and risk assessment (**Section 6**).
- Relevant values and sensitivities, which may include world or national Heritage Listed areas, Ramsar wetlands, listed threatened species or ecological communities, listed migratory species, and sensitive values that exist in or in relation to Commonwealth marine area or land.
- In categorising the environmental values potentially impacted by the Petroleum Activities Program (as presented in **Table 2-1**), there is standardisation of information relevant to understanding the receiving environment. Potential impacts to these environmental values are evaluated in the risk analysis (refer **Section 2.7**), and risk-rated for all planned and unplanned activities. This provides a robust approach to the overall environmental risk evaluation and its documentation in the EP.

By grouping potentially impacted environmental values by aspect (as presented in **Table 2-1**), the presentation of information about the receiving environment is standardised. This information is then consistently applied to the risk evaluation section to provide a robust approach to the overall environmental risk evaluation and its documentation in the EP.

Table 2-1: Environmental values potentially impacted by the Petroleum Activities Program which are assessed within the EP

Environmental value potentially impacted Regulations 13(2)(3)					
<i>Marine Sediment</i>	<i>Water Quality</i>	<i>Air Quality</i>	<i>Ecosystems/ Habitats</i>	<i>Species</i>	<i>Socio-Economic</i>

2.4.3 Relevant Requirements

The relevant requirements in the context of legislation, other environmental approval requirements, conditions and standards that apply to the Petroleum Activities Program have been identified and reviewed. Relevant requirements are presented in **Appendix B** and **Section 1.9**.

Woodside's Corporate Environment and Biodiversity Policy is presented in **Appendix A**.

2.5 Impact and Risk Identification

Relevant environmental aspects and hazards have been identified to support the process to define environmental impacts and risks associated with an activity.

The environmental impact and risk assessment presented in this EP has been informed by recent and historic hazard identification studies and workshops (e.g. HAZID/Environmental Hazard Identification [ENVID]), Process Safety Risk Assessment processes, reviews and associated desktop studies associated with the Petroleum Activities Program. Risks are identified based on planned and potential interaction with the activity (based on the description in **Section 3**), the existing environment (**Section 4**) and the outcomes of Woodside's stakeholder engagement process (**Section 5**). The environmental outputs of applicable risk and impact workshops and associated studies are referred to as 'ENVID' hereafter in this EP.

An ENVID workshop was conducted for the marine seismic survey on 20 January 2021. Participants included project environmental advisors, development coordinator, and engineers. The participants' breadth of knowledge, training and experience was sufficient to reasonably assure that the hazards that may arise in connection with the Petroleum Activities Program in this EP were identified.

Impacts and risks were identified during the ENVID for both planned (routine and non-routine) activities and unplanned (accidents, incidents and emergency conditions) events. During this process, risks that are identified as not applicable (not credible) are removed from the assessment. This is done by defining the activity and identifying that an aspect is not applicable.

The impact and risk information is then classified, evaluated and tabulated for each planned activity and unplanned event. Environmental impacts and risk are recorded in an environmental impacts and risk register. The output of the ENVID is used to present the risk assessment and forms the basis to develop performance outcomes, standards and MC. This information is presented in **Section 6**, using the format presented in **Table 2-2**.

Table 2-2: Example of layout of identification of risks and impacts in relation to risk sources

Source of risk	Evaluation											
	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/Habitat	Species	Socioeconomic	Decision Type	Consequence / Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability
Summary of source of impact/risk												

2.6 Impact and Risk Analysis

Risk analysis further develops the understanding of a risk by defining the impacts and assessing appropriate controls. Risk analysis considered previous risk assessments for similar activities, reviews of relevant studies, reviews of past performance, external stakeholder consultation feedback and a review of the existing environment.

The key steps performed for each risk identified during the risk assessment were:

- Identify the decision type in accordance with the decision support framework.
- Identify appropriate control measures (preventative and mitigative) aligned with the decision type.
- Assess the risk rating or impact.

2.6.1 Decision Support Framework

To support the risk assessment process and Woodside's determination of acceptability (**Section 2.7.2**), Woodside's HSE risk management procedures include using a decision support framework based on principles set out in the Guidance on Risk Related Decision Making (Oil and Gas UK, 2014). This concept is applied during the ENVID, or equivalent preceding processes during historical design decisions, to determine the level of supporting evidence that may be required to draw sound conclusions about risk level and whether the risk is ALARP and acceptable (**Table 2-4**). This is to confirm:

- Activities do not pose an unacceptable environmental risk.
- Appropriate focus is placed on activities where the risk is anticipated to be acceptable and demonstrated to be ALARP.
- Appropriate effort is applied to manage risks based on the uncertainty of the risk, the complexity and risk rating (i.e. potential higher order environmental impacts are subject to further evaluation/assessment).

The framework provides appropriate tools, commensurate to the level of uncertainty or novelty associated with the risk (referred to as Decision Type A, B or C). The decision type is selected based on an informed discussion about the uncertainty of the risk, and documented in ENVID output.

This framework enables Woodside to appropriately understand a risk and determine if the risk is acceptable and can be demonstrated to be ALARP.

2.6.1.1 Decision Type A

Risks classified as a Decision Type A are well understood and established practice. They generally consider recognised good industry practice, which is often embodied in legislation, codes and standards, and use professional judgement.

2.6.1.2 Decision Type B

Risks classified as Decision Type B typically involve greater uncertainty and complexity (and can include potential higher order impacts/risks). These risks may deviate from established practice or have some lifecycle implications, and therefore require further engineering risk assessment to support the decision and ensure the risk is ALARP. Engineering risk assessment tools may include:

- risk-based tools such as cost based analysis or modelling
- consequence modelling
- reliability analysis
- company values.

2.6.1.3 Decision Type C

Risks classified as a Decision Type C typically have significant risks related to environmental performance. Such risks typically involve greater complexity and uncertainty; therefore, requiring adoption of a precautionary approach. The risks may result in significant environmental impact, significant project risk/exposure, or may elicit stakeholder concerns. For these risks, in addition to Decision Type A and B tools, company and societal values need to be considered by performing broader internal and external stakeholder consultation as part of the risk assessment process.



Figure 2-4: Risk-related decision-making framework (Oil and Gas UK 2014)

2.6.2 Decision Support Framework Tools

The following framework tools are applied, as appropriate, to help identify control measures based on the decision type described above:

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- **Legislation, Codes and Standards (LCS)** – identifies the requirements of legislation, codes and standards which must be complied with for the activity.
- **Good Industry Practice (GP)** – identifies further engineering control standards and guidelines that may be applied by Woodside above those required to meet the LCS.
- **Professional Judgement (PJ)** – uses relevant personnel with the knowledge and experience to identify alternative controls. Woodside applies the hierarchy of control as part of the risk assessment to identify any alternative measures to control the risk.
- **Risk Based Analysis (RBA)** – assesses the results of probabilistic analyses such as modelling, quantitative risk assessment and/or cost benefit analysis to support the selection of control measures identified during the risk assessment process.
- **Company Values (CV)** – identifies values identified in Woodside's code of conduct, policies and the Woodside compass. Views, concerns and perceptions are to be considered from internal Woodside stakeholders directly affected by the planned impact or potential risk.
- **Societal Values (SV)** – identifies the views, concerns and perceptions of relevant stakeholders and addresses relevant stakeholder views, concerns and perceptions.

2.6.3 Decision Calibration

To determine that alternatives selected and the control measures applied are suitable, the following tools may be used for calibration (i.e. checking) where required:

- **Legislation, Codes and Standards/Verification of Predictions** – verification of compliance with applicable LCS and/or good industry practice.
- **Peer Review** – independent peer review of PJs, supported by risk-based analysis, where appropriate.
- **Benchmarking** – where appropriate, benchmarking against a similar facility or activity type or situation that has been accepted to represent acceptable risk.
- **Internal Stakeholder Consultation** – consultation performed within Woodside to inform the decision and verify CVs are met.
- **External Stakeholder Consultation** – consultation performed to inform the decision and verify societal values are considered.

Where appropriate, additional calibration tools may be selected specific to the decision type and the activity.

2.6.3.1 Control Measures (Hierarchy of Controls)

Risk reduction measures are prioritised and categorised in accordance with the hierarchy of controls, where risk reduction measures at the top of the hierarchy take precedence over risk reduction measures further down:

- **Elimination** of the risk by removing the hazard.
- **Substitution** of a hazard with a less hazardous one.
- **Engineering Controls** include design measures to prevent or reduce the frequency of the risk event, or detect or control the risk event (limiting the magnitude, intensity and duration) such as:
 - Prevention: design measures that reduce the likelihood of a hazardous event occurring.
 - Detection: design measures that facilitate early detection of a hazardous event.

- Control: design measures that limit the extent/escalation potential of a hazardous event.
 - Mitigation: design measures that protect the environment if a hazardous event occurs.
 - Response Equipment: design measures or safeguards that enable clean up/response after a hazardous event occurs.
- **Procedures and Administration** includes management systems and work instructions used to prevent or mitigate environmental exposure to hazards.
 - **Emergency Response and Contingency Planning** includes methods to enable recovery from the impact of an event (e.g. protection barriers deployed near the sensitive receptor).

2.6.4 Impact and Risk Classification

Environmental impacts and risks are assessed to determine their potential significance or consequence. The impact significance or consequence considers the magnitude of the impact or risk and the sensitivity of the potentially impacted receptor (represented by **Figure 2-5**).

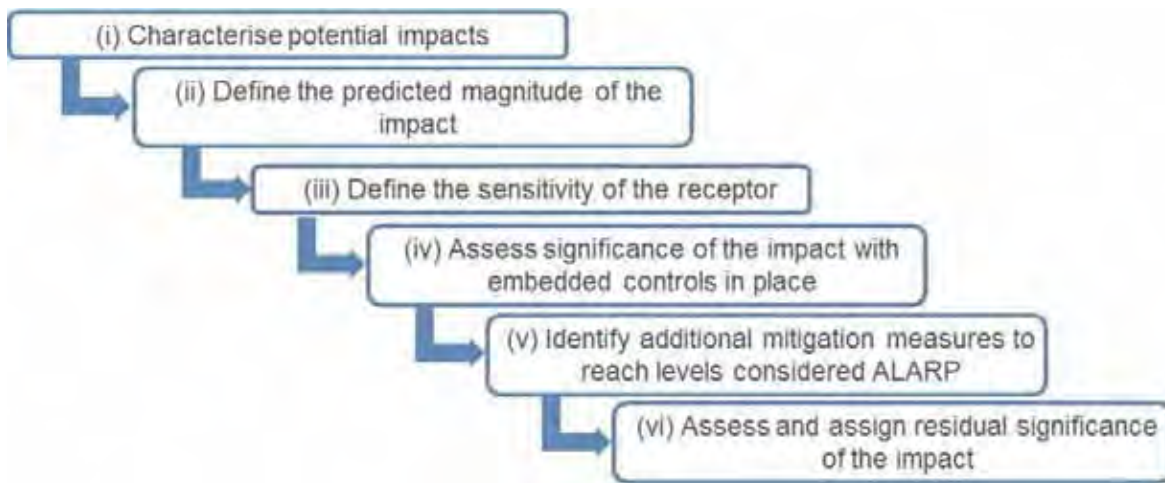


Figure 2-5: Environmental impact and risk analysis

Impacts are classified in accordance with the consequence (**Section 2.4**) outlined in the Woodside Risk Management Procedure and Risk Matrix.

Risks are assessed qualitatively and/or quantitatively in terms of both likelihood and consequence in accordance with the Woodside Risk Management Procedure and Risk Matrix.

The impact and risk information is summarised, including classification, and evaluation information, as shown in the example in **Table 2-2**, evaluated for each planned activity and unplanned event.

Table 2-3: Woodside risk matrix (environment and social and cultural) consequence descriptions

Environment	Social and Cultural	Consequence Level
Catastrophic, long-term impact (more than 50 years) on highly valued ecosystems, species, habitat or physical or biological attributes	Catastrophic, long-term impact (more than 20 years) to a community, social infrastructure or highly valued areas/items of international cultural significance	A
Major, long-term impact (ten to 50 years) on highly valued ecosystems, species, habitat or physical or biological attributes	Major, long-term impact (five to 20 years) to a community, social infrastructure or highly valued areas/items of national cultural significance	B

Environment	Social and Cultural	Consequence Level
Moderate, medium-term impact (two to ten years) on ecosystems, species, habitat or physical or biological attributes	Moderate, medium term Impact (two to five years) to a community, social infrastructure or highly valued areas/items of national cultural significance	C
Minor, short-term impact (one to two years) on species, habitat (but not affecting ecosystems function), physical or biological attributes	Minor, short-term impact (one to two years) to a community or highly valued areas/items of cultural significance	D
Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes	Slight, short-term impact (less than one year) to a community or areas/items of cultural significance	E
No lasting effect (less than one month); localised impact not significant to environmental receptors	No lasting effect (less than one month); localised impact not significant to areas/items of cultural significance	F

2.6.5 Risk Rating Process

The risk rating process is performed to assign a level of risk to each risk event, measured in terms of consequence and likelihood. The assigned risk level is therefore determined after identifying the decision type and appropriate control measures.

The risk rating process considers the potential environmental consequences and, where applicable, the social and cultural consequences of the risk. The risk ratings are assigned using the Woodside risk matrix (**Figure 2-6**).

The risk rating process is performed using the following steps:

2.6.5.1 Select the Consequence Level

Determine the worst-case credible consequence associated with the selected event, assuming all controls (preventative and mitigative) are absent or have failed (**Table 2-3**). Where more than one potential consequence applies, select the highest severity consequence level.

2.6.5.2 Select the Likelihood Level

Determine the description that best fits the chance of the selected consequence occurring, assuming reasonable effectiveness of the preventative and mitigative controls (**Table 2-4**).

Table 2-4: Woodside risk matrix likelihood levels

Likelihood Description						
Frequency	1 in 100,000–1,000,000 years	1 in 10,000–100,000 years	1 in 1000–10,000 years	1 in 100–1,000 years	1 in 10–100 years	>1 in 10 years
Experience	Remote: Unheard of in the industry	Highly Unlikely: Has occurred once or twice in the industry	Unlikely: Has occurred many times in the industry but not at Woodside	Possible: Has occurred once or twice in Woodside or may possibly occur	Likely: Has occurred frequently at Woodside or is likely to occur	Highly Likely: Has occurred frequently at the location or is expected to occur
Likelihood Level	0	1	2	3	4	5

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2.6.5.3 Calculate the Risk Rating

The risk level is derived from the consequence and likelihood levels determined above in accordance with the risk matrix shown in **Figure 2-6**. A likelihood and risk rating is only applied to environmental risks using the Woodside risk matrix.

This risk level is used as an input into the risk evaluation process and ultimately for prioritising further risk reduction measures. Once each risk is treated to ALARP, the risk rating articulates the ALARP baseline risk as an output of the ENVID studies.



Figure 2-6: Woodside risk matrix – risk level

To support ongoing risk management (a key component of Woodside's Process Safety Management Framework – refer to Implementation Strategy (**Section 7**)), Woodside uses the concept of 'current risk' and applies a current risk rating to indicate the current or 'live' level of risk, considering the controls that are currently in place and regularly effective. Current risk rating is effective in articulating potential divergence from baseline risk, such as if certain controls fail or could potentially be compromised. Current risk ratings aid in the communication and visibility of the risk events, and ensures risk is continually managed to ALARP by identifying risk reduction measures and assessing acceptability.

2.7 Impact and Risk Evaluation

Environmental impacts and risks cover a wider range of issues, differing species, persistence, reversibility, resilience, cumulative effects, and variability in severity than safety risks. Determining the degree of environmental risk, and the corresponding threshold for whether a risk/impact has been reduced to ALARP and is acceptable, is evaluated to a level appropriate to the nature and scale of each impact or risk. Evaluation includes considering the:

- Decision Type.
- Principles of ESD – as defined under the EPBC Act.
- Internal context – ensuring the proposed controls and risk level are consistent with Woodside policies, procedures and standards (**Section 6** and **Appendix A**).
- External context – the environment consequence (Section 6) and stakeholder acceptability (Section 5).
- Other requirements – ensuring the proposed controls and risk level are consistent with national and international standards, laws and policies.

In accordance with Environment Regulation 10A(a), 10A(b), 10A(c) and 13(5)(b), Woodside applies the process described in the subsections below to demonstrate ALARP and acceptability for environmental impacts and risks, appropriate to the nature and scale of each impact or risk.

2.7.1 Demonstration of ALARP

Descriptions have been provided in **Table 2-5** to articulate how Woodside demonstrates that different risks, impacts and Decision Types identified within the EP are ALARP.

Table 2-5: Summary of Woodside's criteria for ALARP demonstration

Risk	Impact	Decision type
Low and moderate (below C level consequences)	Negligible, slight, or minor (D, E or F)	A
<p>Woodside demonstrates these risks, impacts and decision types are reduced to ALARP if:</p> <ul style="list-style-type: none"> controls identified meet legislative requirements, industry codes and standards, applicable company requirements and industry guidelines further effort towards impact/risk reduction (beyond employing opportunistic measures) is not reasonably practicable without sacrifices grossly disproportionate to the benefit gained. 		
High, very high or severe (C+ consequence risks)	Moderate and above (A, B or C)	B and C
<p>Woodside demonstrates these higher order risks, impacts and decision types are reduced to ALARP (where it can be demonstrated using good industry practice and risk-based analysis) that:</p> <ul style="list-style-type: none"> legislative requirements, applicable company requirements and industry codes and standards are met societal concerns are accounted for the alternative control measures are grossly disproportionate to the benefit gained. 		

2.7.2 Demonstration of Acceptability

Descriptions have been provided in **Table 2-6** to articulate how Woodside demonstrates that different risks, impacts and Decision Types identified within the EP are Acceptable.

Table 2-6: Summary of Woodside's criteria for acceptability

Risk	Impact	Decision type
Low and moderate	Negligible, slight, or minor (D, E or F)	A
<ul style="list-style-type: none"> Lower order impacts and risks do not contravene the principles of ESD. Given the classification (Section 2.6.4) of these lower order impacts and risks, they will not threaten: <ul style="list-style-type: none"> serious or irreversible environmental damage the quality of the environment available to future generations biodiversity and ecological integrity (DAWE, 2003) (refer Section 2.8). activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1. demonstrates these lower order risks, impacts and decision types are 'Broadly Acceptable' if they meet: <ul style="list-style-type: none"> legislative requirements including the requirements under the OPGGS Act (2006) Section 280 (2) to carry on those activities in a manner that does not interfere with <ul style="list-style-type: none"> (a) navigation; or (b) fishing (c) conservation of the resources of the sea and seabed (d) any activities of another person being lawfully carried on by way of exploration or constructions (e) the enjoyment of native title rights and interests (within the meaning of the Native Title Act 1993) to a greater extent the is necessary for the reasonable exercises of the rights and performance of the duties of the titleholder industry codes and standards applicable company requirements 		

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Risk	Impact	Decision type
<ul style="list-style-type: none"> and where further effort towards reducing risk (beyond employing opportunistic measures) is not reasonably practicable without sacrifices grossly disproportionate to the benefit gained. 		
High, very high or severe	Moderate and above (D, E or F)	B and C
<p>Woodside demonstrates these higher order risks, impacts and decision types are of an 'Acceptable' level if it can be demonstrated that the predicted levels of impact and/or residual risk, are:</p> <ul style="list-style-type: none"> managed to ALARP (as described in Section 2.7.1); and meet the following criteria, appropriate to the nature and scale of each impact and risk: <p>Impact/risk does not contravene relevant principles of ESD, as defined under the EPBC Act.</p> <p>Internal context – the proposed controls and consequence/risk level are consistent with Woodside policies, procedures and standards.</p> <p>External context – stakeholder expectations and feedback have been considered (Section 5).</p> <p>External context - activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1.</p> <p>Other requirements – the proposed controls and consequence/risk level are consistent with national and international industry standards, laws and policies, and applicable plans for management and conservation advices, conventions, and significant impact guidelines (e.g. for MNES) have been considered.</p> <p>Where there are significant complexities in assessing and managing impacts to different receptors and for demonstrating how these impacts are acceptable (e.g. significant stakeholder concern for specific receptors, lack of consensus of appropriate controls or standards), acceptability may be demonstrated separately for key receptors. This is not applicable for risks, given the consequence of an unplanned risk event occurring may not be acceptable and, therefore, acceptability is demonstrated in the context of the residual likelihood of an event occurring.</p>		

2.8 Overview

This section has been prepared in accordance with Regulation 13(1) of the Environment Regulations, and describes the activities to be performed as part of the Petroleum Activities Program under this EP.

2.9 EPBC Act Assessment

To support the demonstration of acceptability, a separate assessment is undertaken across the following three legislative requirements incorporated into the EPBC Act.

2.9.1 Principles of ESD

As part of the demonstration of acceptability a separate assessment is undertaken to demonstrate that the EP is not inconsistent with relevant principles of ESD (refer **Section 2.7.2**).

2.9.2 MNES: Significant Impact Guidelines 1.1

A separate assessment is undertaken to determine if the potential impacts/risks of the activity trigger any relevant criteria listed in the MNES: Significant Impact Guidelines 1.1.

An action is likely to have a significant impact on a critically endangered or endangered species if there is a real chance or possibility that it will:

- lead to a long-term decrease in the size of a population
- reduce the area of occupancy of the species
- fragment an existing population into two or more populations
- adversely affect habitat critical to the survival of a species
- disrupt the breeding cycle of a population

- modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline
- result in invasive species that are harmful to a critically endangered or endangered species becoming established in the endangered or critically endangered species' habitat
- introduce disease that may cause the species to decline, or interfere with the recovery of the species.

An action is likely to have a significant impact on a vulnerable species if there is a real chance or possibility that it will:

- lead to a long-term decrease in the size of an important population of a species
- reduce the area of occupancy of an important population
- fragment an existing important population into two or more populations
- adversely affect habitat critical to the survival of a species
- disrupt the breeding cycle of an important population
- modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline
- result in invasive species that are harmful to a vulnerable species becoming established in the vulnerable species' habitat
- introduce disease that may cause the species to decline, or
- interfere substantially with the recovery of the species.

2.9.3 Recovery Plan and Threat Abatement Plan Assessment

A separate assessment is undertaken to demonstrate that the EP is not inconsistent with any relevant recovery plans or threat abatement plans (refer **Section 1.9.2.1**). The steps in this process are:

- Identify relevant listed threatened species and ecological communities (**Section 4.6**).
- Identify relevant recovery plans and threat abatement plans (**Section 6.8**).
- List all objectives and (where relevant) the action areas of these plans, and assess whether these objectives/action areas apply to government, the Titleholder, and the Petroleum Activities Program (**Section 6.8**).
- For those objectives/action areas applicable to the Petroleum Activities Program, identify the relevant actions of each plan, and evaluate whether impacts and risks resulting from the activity are clearly not inconsistent with that action (**Section 6.8**).

2.10 Environmental Performance Outcomes, Standards and Measurement Criteria

EPOs, EPSs and MC have been defined to address the potential environmental impacts and risks and are presented in **Section 6**.

2.11 Implementation, Monitoring, Review and Reporting

An implementation strategy for the Petroleum Activities Program describes the specific measures and arrangements to be implemented for the duration of the Petroleum Activities Program. The implementation strategy is based on the principles of AS/NZS ISO 14001:2016 Environmental Management Systems, and demonstrates:

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- control measures are effective in reducing the environmental impacts and risks of the Petroleum Activities Program to ALARP and acceptable levels.
- EPOs and standards set out in the EP are met through monitoring, recording, audit, management of non-conformance and review.
- all environmental impacts and risks of the Petroleum Activities Program are periodically reviewed in accordance with Woodside's risk management procedures.
- roles and responsibilities are clearly defined, and personnel are competent and appropriately trained to implement the requirements set out in this EP, including in emergencies or potential emergencies.
- arrangements are in place to respond to and monitor impacts from oil pollution emergencies.
- environmental reporting requirements, including 'reportable incidents', are met.
- appropriate stakeholder consultation is performed throughout the activity.

The implementation strategy is presented in **Section 7**.

2.12 Stakeholder Consultation

A stakeholder assessment is performed to identify relevant persons (as defined under Regulation 11A of the Environment Regulations). An activity update is issued electronically to relevant stakeholders to provide a reasonable consultation period. Further details and information are provided to any stakeholder if requested.

Each stakeholder response is summarised and assessed and a response, where appropriate, is provided by Woodside.

The stakeholder consultation, along with the process for ongoing engagement and consultation throughout the activity, is presented in **Section 5**. A copy of the full text correspondence with relevant people is provided in **Appendix F**.

3 DESCRIPTION OF THE ACTIVITY

3.1 Project Overview

The proposed Petroleum Activities Program comprises a marine seismic survey (MSS) of the Scarborough field, the 'Scarborough 4D Baseline (B1) MSS', which will be acquired in the Northern Carnarvon Basin on the Exmouth Plateau within Woodside's permit areas WA-61-L, WA-62-L, WA-61-R, WA-63-R, as well as surrounding permit areas WA-530-P, WA-66-R, WA-67-R, WA-68-R, WA-83-R, WA-89-R, WA-268-P, WA-365-P, WA-365-P LL, WA-365-P LK, WA-383-P, WA-474-P, WA-474-P LS, WA-518-P and gazettal block W19-35. Additionally, the proposed activity includes a potential extension to cover the Jupiter field to the north-east, within permit area WA-61-R.

Table 3-1 provides an overview of the key characteristics for the survey. The commencement of the activities is subject to approvals, vessel availability and weather constraints.

Table 3-1: Petroleum Activities Program overview

Item	Description
Petroleum titles	WA-61-L, WA-62-L, WA-61-R, WA-63-R
Location	North Carnarvon Basin
Active Source Area	~5650 km ²
Operational Area	~9200 km ²
Water depths in Active Source Area	~800–1150 m
Vessels	Four – one seismic survey vessel, one support vessel, one chase vessel and one spotter vessel (May to June).

3.2 Purpose of the Activity

The objective for the Petroleum Activities Program is to acquire a new marine 3D / Baseline 4D seismic survey over the Scarborough and Jupiter fields, as part of an appraisal program for reservoir management. This new 3D survey will provide an uplift in seismic imaging for the Scarborough field from the 2004 vintage seismic data (HEX-003) and ultimately be used as the baseline for time lapse data in the event of acquisition of future monitoring seismic surveys. This will help inform the optimised management of hydrocarbon reserves.

3.3 Location

The proposed survey is located in Commonwealth waters in north-west Australia (denoted as polygons in **Figure 3-1**). For the purposes of this EP, two areas have been defined for the survey based on the type of activities that will be undertaken and the discharge of the seismic source. The following areas apply:

- Active Source Area.
- Operational Area.

Table 3-3 provides the boundary coordinates for the two areas.

The Operational Area for the Scarborough 4D B1 MSS, located in the North Carnarvon Basin, is approximately:

- 201 km WNW of the Montebello Islands and Barrow Island.
- 188 km north-west of North-west Cape.

- 245 km north-west of Onslow.
- 167 km NNW of the Ningaloo Coast World Heritage Property (WHP).

The southern corner of the Operational Area is located about 33 km from the boundary of the Gascoyne Marine Park (**Figure 4-12**).

3.3.1 Active Source Area

The Active Source Area is defined as the maximum potential area within which seismic acoustic emissions may occur for the purpose of acquiring data. Discharge of the seismic source during vessel run-ins, run-outs, soft starts and full-fold seismic data acquisition will occur within the Active Source Area. Seismic source testing (i.e. bubble tests) will also occur within the Active Source Area. The seismic source will not be discharged outside of the Active Source Area.

It is important to note that the full-power discharge of the source for full-fold seismic data acquisition will take place over smaller, more discrete areas within the Active Source Area. The larger Active Source Area provides Woodside with flexibility as the survey scope is still being defined.

The extent of the Active Source Area is approximately 5650 km². Water depths within the Active Source Area range from ~800 m to 1150 m.

3.3.2 Operational Area

The Operational Area includes both the Active Source Area and a surrounding buffer for the purpose of vessel line turns and other vessel manoeuvres. The seismic source will not be discharged within this buffer.

The extent of the Operational Area is approximately 9200 km². Water depths within the Operational Area range from ~800 m to 1150 m.

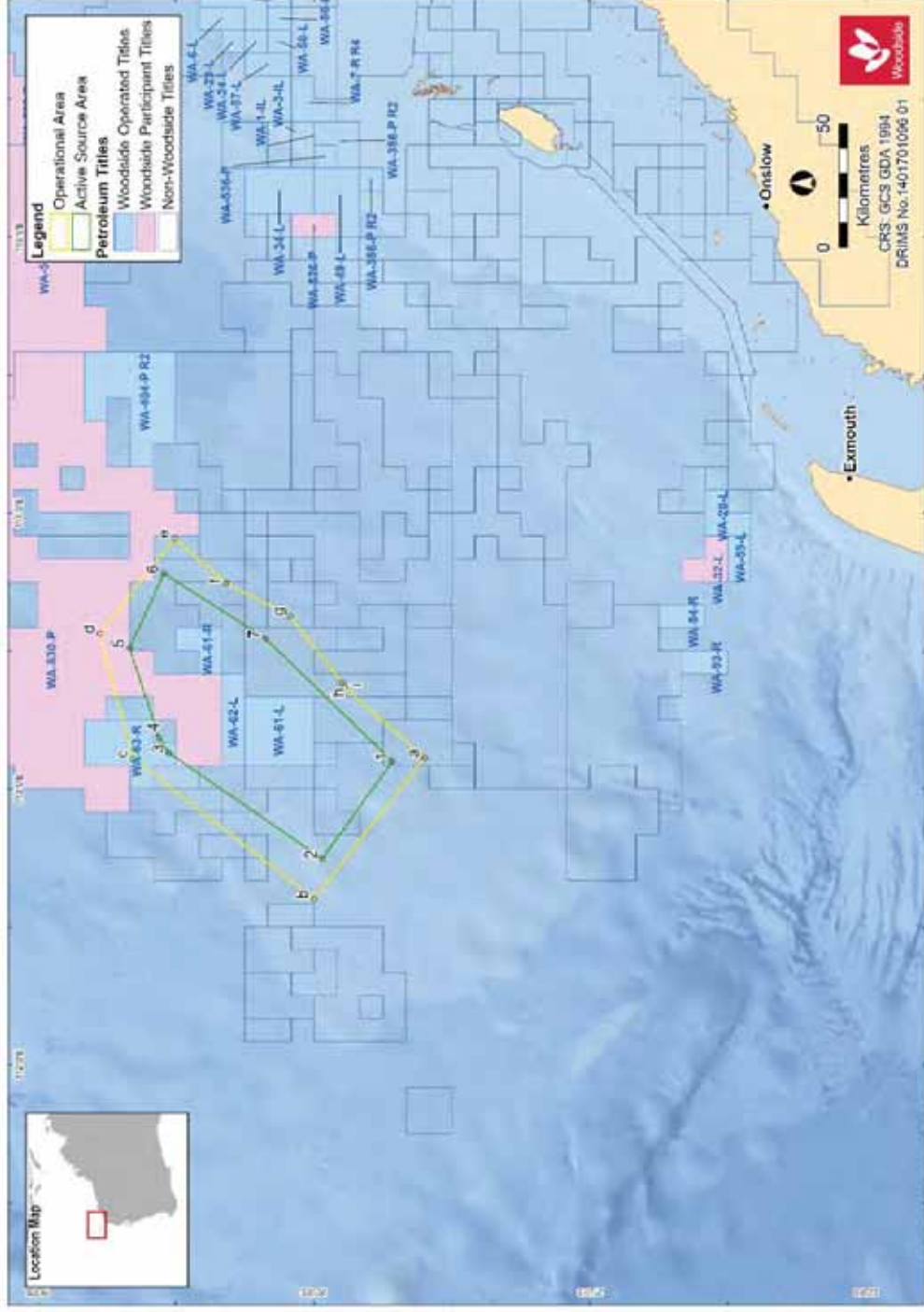


Figure 3-1: Scarborough 4D B1 MSS Areas, including the Jupiter Extension

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Table 3-2: Indicative boundary coordinates for the Petroleum Activities Program Active Source Area and Operational Area

Location point (GDA94 Degrees minutes seconds)	Latitude	Longitude
Active Source Area		
1	20°16'59.043"S	113°6'0.387"E
2	20°1'47.096"S	112°44'50.156"E
3	19°28'31.503"S	113°7'47.431"E
4	19°26'15.236"S	113°11'12.497"E
5	19°19'55.308"S	113°30'40.293"E
6	19°27'20.645"S	113°46'53.197"E
7	19°49'26.264"S	113°32'44.0"E
Operational Area		
a	20°24'2.0"S	113°6'45.162"E
b	19°59'57.873"S	112°36'7.851"E
c	19°20'39.38"S	113°6'41.252"E
d	19°13'25.19"S	113°33'49.172"E
e	19°29'41.467"S	113°54'32.011"E
f	19°40'50.544"S	113°44'44.882"E
g	19°54'42.118"S	113°37'40.185"E
h	20°6'2.873"S	113°23'11.168"E
i	20°6'31.786"S	113°22'13.473"E

¹ The final Active Source Area may be subject to slight modifications as the survey scopes become better defined; however, no changes will exceed the Operational Area as defined in this EP.

3.4 Timing

The planned duration for the survey is 80 days. The planned duration includes a maximum of 70 days of seismic data acquisition, plus 10 days of contingency for potential vessel or equipment down time and adverse weather conditions. The exact survey duration is dependent upon the final 4D activity scope.

The survey duration relates to the time that the seismic survey vessel is in the Operational Area with the towed seismic source array and streamers deployed for the purpose of undertaking the Petroleum Activities Program. In the event that the seismic vessel needs to demobilise from the Operational Area (for example, for cyclone avoidance), any time that the vessel is demobilised from the Operational Area will not be counted towards the survey duration. Time that is counted towards the specified survey duration will commence again once the seismic vessel has returned to the Operational Area and the equipment is deployed for the purpose of resuming the Petroleum Activities Program.

The activity is planned to commence in Q2 or Q3 2023 with the earliest potential commencement date for the survey being upon EP acceptance. The acquisition will be completed in Q3/Q4 2023. However, this is subject to the EP acceptance timeline, vessel availability, operational constraints and prevailing weather conditions. Therefore, to manage these potential uncertainties, the start date may vary but the Scarborough 4D B1 MSS will be completed by 31 December 2023.

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The confirmed start and end dates will be considered in conjunction with other Scarborough activity EP's to ensure consideration of possible concurrent and cumulative impacts

The exact start and end dates of the survey will be communicated to stakeholders once confirmed, in accordance with the ongoing stakeholder consultation process described in **Section 5**.

3.5 Activity Components

3.5.1 Survey Method

The marine seismic surveys proposed are typical seismic surveys similar to most others conducted in Australian marine waters (in terms of technical methods and procedures). The surveys will be conducted using a purpose-built seismic vessel.

During the proposed activities, the survey vessel will traverse a series of pre-determined sail lines within the Active Source area at a speed of about 4–5 knots. As the vessel travels along the survey lines, regular pulses of sound will be emitted from a seismic source array and directed down through the water column and seabed. The produced sound waves are attenuated and reflected at geological boundaries and the reflected signals are detected using sensitive hydrophone microphones and potentially micro electro-mechanical system (MEMS) accelerometers arranged along cables (called 'streamers') which are towed behind the survey vessel. The reflected sound is then processed to provide 3D data about the structure and composition of geological formations below the seabed. A summary of the seismic survey parameters is provided in **Table 3-2**.

3.5.2 Seismic Data Acquisition

The seismic vessel will typically acquire the data along a series of adjacent and parallel lines in a "racetrack"-like pattern. At the end of the first line, the vessel will turn in a wide arc to position for another parallel line in the opposite direction, offset several kilometres away from the previous line. Once this next line is complete, the vessel will turn again to position for a line adjacent to the first line and offset by approximately 450 m, being the next sail line separation. This pattern is repeated until the required coverage is completed. The time required to complete each sail line is dependent on the line length, vessel speed and currents. The orientation and length of the sail lines are dependent on the final 4D survey design but will be either orientated 25°/205° or 040.5°/220.5°, with a maximum sail line length of up to 105 km.

As the vessel travels along the sail lines, the seismic source will emit regular acoustic pulses (approximately every 5 seconds with a shot point interval of 12.5 m) (refer to **Table 3-3**).

The 3D seismic data acquired during the survey will serve as a 4D baseline for potential future monitoring surveys, to be acquired at a later date (refer to **Section 3.2**). Measuring the subtle, but time-dependent changes in the reservoir fluid properties on the basis of the seismic signals from the repeat 3D surveys requires very accurate positioning of the acoustic source (shot point) and streamers (receiver points).

3.5.3 Seismic Source

The proposed Petroleum Activities Program will use a seismic source array within the Active Source Area. This consists of a towed configuration of air-powered sources to generate acoustic pulses by periodically discharging compressed air into the water column. Energy from these pulses reflects from the boundaries between geological layers in the sub-surface; the reflected energy of seismic traces is recorded by the receivers located along the towed streamers.

The seismic source will comprise an airgun array with a total volume of up to 3150 in³ (refer to **Table 3-3**) with an operating pressure of about 13,800 kPa (2000 psi).

The source array will be towed at a depth of 6–8 m (± 1 m). The source arrays will be discharged with a shot point interval of 12.5 m horizontal distance (equivalent to approximately every 5–6 seconds)

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(refer to **Table 3-3**). The Scarborough 4D B1 MSS will most likely use a triple source configuration ('flip-flop-flap' discharge).

Table 3-3: Survey acquisition parameters

Parameter		Scarborough 4D B1 MSS		
General parameters	Active Source Area	~5650 km ²		
	Operational Area	~9200 km ²		
	Max. sail line length	~105 km		
	Line separation (nominal)	450 m		
	Line Orientation	25–340.5° / 205–2220.5° North East - South West		
	Water depths in Acquisition Area	~800–1150 m		
	Planned survey duration ¹	80-days		
Acoustic emissions	Source configuration	Triple source (flip/flop/flap) or dual source (flip/flop)		
	Airgun array capacity (approximate)	3150 in ³		
	Operating pressure	2000 psi		
	Airgun array tow depth	6–8 m (±1 m)		
	Shot point interval	12.5 m (triple source) or 18.75 m (dual source)		
	Peak frequency range	2-200 Hz		
	Modelled far-field source levels (Koessler <i>et al.</i> 2021)	Peak source pressure $L_{s,pk}$ (dB re 1 μ Pa m)	Per-pulse source SEL ($L_{s,E}$) (dB 1 μ Pa ² m ² s)	
			10-2000 Hz	2000-25,000 Hz
	Broadside	248.1	224.1	183.9
	Endfire	246.3	223.2	183.9
Vertical	254.4	227.4	193.5	
Vertical (surface affected)	254.4	230.2	196.5	
Acoustic reception	No. of streamers (approximate)	Up to 14		
	Streamer length (approximate)	Approximately 8000 m		
	Streamer spacing (approximate)	50 to 100 m		
	Maximum width of streamer array (approximate)	Approximately to 1.5 km		
	Streamer tow depth (approximate)	From ~15m to 25 m		

¹ The acquisition duration for the Petroleum Activities Program is subject to EP acceptance, business approval to commence, vessel availability, operational constraints and prevailing weather conditions.

3.5.4 Receiver Technology

3.5.4.1 Solid Streamers

The proposed Petroleum Activities Program will use a seismic vessel to tow up to 14 solid streamers (**Table 3-3**). The streamers will be towed at a depth of about 15–25 m, with streamer spacing (separations) of 50 to 100 m. The streamer lengths will be approximately 8000 m, towed approximately 500 m behind the seismic vessel and, therefore, extending approximately 8.5 km behind the vessel. Solid streamers will be used instead of traditional fluid-filled streamers so as to reduce the potential risk of damaged streamers releasing fluid to the environment.

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The streamers contain steering devices in the form of remote controlled wings, which enable both precise depth control and horizontal steering. Horizontal streamer steering reduces feathering (where the streamer tends to veer offline due to wind and currents) and enables safe streamer separation control and active steering. Streamer recovery devices (SRDs) will be fitted to the streamers. If the streamers go below about 50 m depth, the SRDs automatically deploy inflatable air bags / buoys to raise the streamer to the surface for retrieval.

3.5.5 Project Vessels

Up to four project vessels (seismic, support, chase and spotter vessel) are expected to be required for Scarborough 4D B1 MSS.

The survey will be conducted using a single seismic vessel. A support vessel, will accompany the seismic vessel to re-supply it with fuel and other logistical and operational supplies (including taking the seismic vessel under tow, if required). A chase vessel will be used to manage interactions with shipping and fishing activities, if required. It is intended that a dedicated spotter vessel with two MFOs aboard will be deployed ahead of the seismic vessel.

Table 3-4 outlines typical parameters of the vessels that will be used during the seismic survey.

The seismic vessel and towed arrays, comprising the acoustic source array and streamer array (including the streamer header buoys, starboard and port deflectors or baravanes, streamers and tail buoys), are surrounded by a Safe Navigation Area (SNA). The SNA will extend to a distance of 3 Nautical miles (Nm) around the seismic vessel and towed equipment (refer to **Figure 3-2**). The support/chase vessel will be used to ensure third party vessels are prevented from entering the SNA.

Note that in addition to the three main project vessels, small work boat(s) and fast rescue craft (FRC) will be launched from the seismic vessel for in-water streamer maintenance. A typical workboat is less than 5 m in length and mainly assists with the deployment, positioning, cleaning and maintenance and recovery of the towed arrays.

Table 3-4: Representative vessel specifications

Specification	Seismic vessel	Support vessel	Chase/spotter vessel(s)
Gross Registered Tonnage (GRT)	~13,000- 22,000	~3000	<400
Length overall	~110 m	~65 m	~22 m
Breadth	~40 m	~20 m	~6 m
Draft (max)	8 m	7 m	~2 m
Persons on board	80	50	4–12
Fuel type	Marine diesel oil (MDO)	MDO	MDO

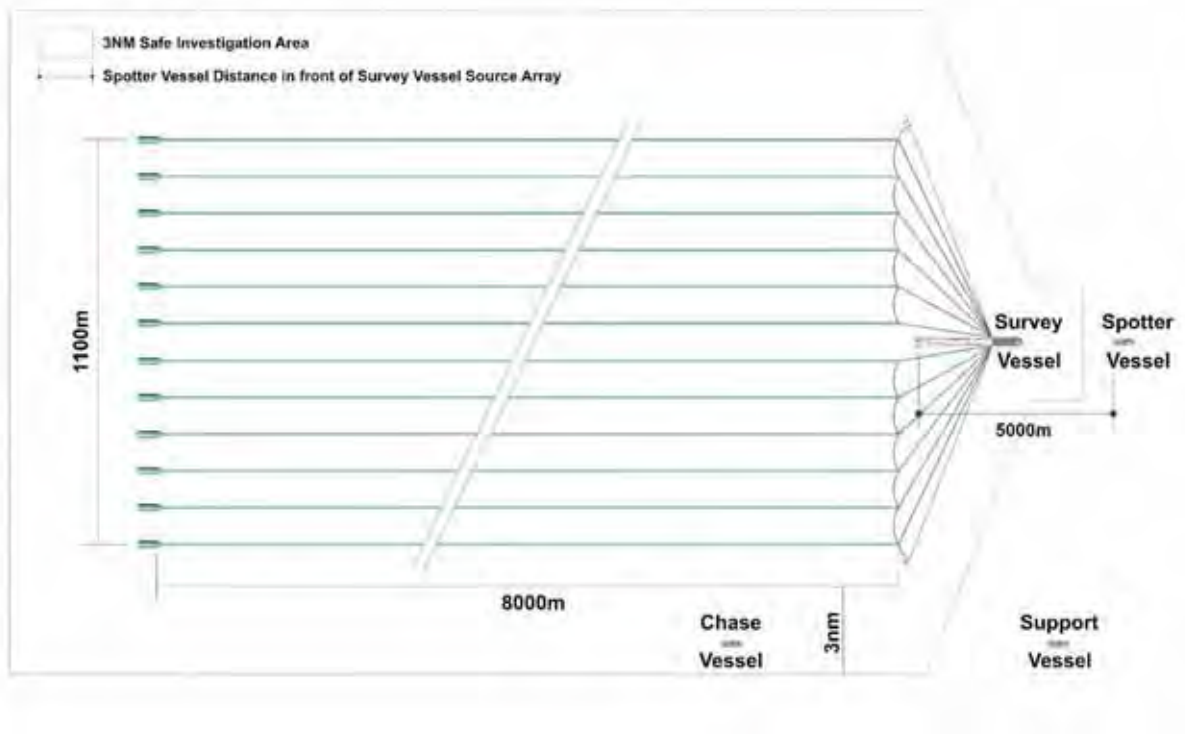


Figure 3-2: Safe Navigation Area surround the seismic vessel and towed arrays (note that streamer lengths and spreads are indicative and may vary)

Potable water, primarily for accommodation and associated domestic areas, will be generated on the seismic and support/chase vessels using a reverse osmosis system. This process will produce brine, which is diluted and discharged at the sea surface in accordance with the controls detailed in **Section 6.6.5**.

The project vessels will also discharge deck drainage from open drainage areas, bilge water from closed drainage areas, putrescible waste and treated sewage and grey water. Any hazardous and non-hazardous waste will be appropriately stored and transported to shore for disposal.

3.5.6 Helicopters

Due to the distance from the coast, if required crew changes will most likely be via a support or chase vessel from the nearest port(s) of call, but may be made by helicopter. If required during the seismic survey (in event of an emergency), helicopters may be used and operated out of the Karratha heliport or Exmouth Aerodrome.

3.5.7 Refuelling

At-sea refuelling (bunkering) of the seismic vessel may occur, depending on fuel consumption during the survey. At-sea refuelling operations will occur within the Operational Area, and in accordance with contractor operational procedures and the control measures outlined in **Section 6.7.3**.

4 DESCRIPTION OF THE EXISTING ENVIRONMENT

4.1 Overview

In accordance with Regulations 13(2) and 13(3) of the Environment Regulations, this section describes the existing environment that may be affected by the activity (planned and unplanned, as described in **Section 3**), including details of the particular relevant values and sensitivities of the environment, which were used for the risk assessment.

The Environment that May Be Affected (EMBA) is the largest spatial extent where unplanned events could have an environmental consequence on the surrounding environment. For this EP, the EMBA is the potential spatial extent of surface and in-water hydrocarbons at concentrations above ecological impact thresholds, in the event of the worst-case credible spill, ecological impact thresholds used to delineate the EMBA are defined in **Section 6.7.1.2**. The worst-case credible spill scenario for this EP is a vessel collision resulting in hydrocarbon release. Note, no shoreline accumulation of hydrocarbons above threshold concentrations (100 g/m²) resulted from the modelled worst-case credible spill.

Woodside recognises that hydrocarbons may be visible beyond the EMBA at lower concentrations than the ecological impact thresholds defined in **Section 6.7.1.2**. These visible hydrocarbons are not expected to cause ecological impacts. In respect of this, an additional socio-cultural EMBA is defined, as the potential spatial extent within which social-cultural impacts may occur from changes to the visual amenity of the marine environment. Receptors relevant to the socio-cultural EMBA include Commonwealth and State marine protected areas (MPAs), National and Commonwealth Heritage Listed places, areas of tourism and recreation, and commercial and traditional fisheries. For this EP, the socio-cultural threshold for surface hydrocarbons encompasses an area fully within the boundaries of the EMBA for ecological impacts. The EMBA and socio-economic EMBA are described in **Table 4-1**.

The EMBA presented does not represent the predicted coverage of any one hydrocarbon spill or a depiction of a slick or plume at any particular point in time. Rather, the areas are a composite of a large number of theoretical paths, integrated over the full duration of the simulations under various metocean conditions.

Table 4-1: Hydrocarbon spill thresholds used to define EMBA for surface and in-water hydrocarbons

Hydrocarbon type	EMBA ¹	Socio-cultural EMBA ¹	Planning area for scientific monitoring
Surface	10 g/m ² This represents the minimum oil thickness (0.01 mm) at which ecological impacts (e.g. to birds and marine mammals) are expected to occur.	1 g/m ² This represents a wider area where a visible sheen may be present on the surface and, therefore, the concentration at which socio-cultural impacts to the visual amenity of the marine environment may occur. However, it is below concentrations at which ecological impacts are expected to occur. This low exposure value also establishes the planning area for scientific monitoring (NOPSEMA guidance note: A652993, April 2019).	
Dissolved	50 ppb This represents potential toxic effects, particularly sub-lethal effects to highly sensitive species (NOPSEMA guidance note: A652993, April 2019). As dissolved hydrocarbons are within the water column and not visible, impacts to socio-cultural receptors can be associated with ecological impacts. Therefore, dissolved hydrocarbons at this threshold also represent the level at which socio-cultural impacts may occur. The review and results are presented in Section 6.7.1 .		10 ppb This low exposure value establishes the planning area for scientific monitoring (based on potential for exceedance of water quality triggers) (NOPSEMA guidance note: A652993, April 2019). This area is described further in Appendix D . In the event of a spill, DNP will be notified of Australian Marine Parks (AMPs) which may be contacted by

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Hydrocarbon type	EMBA ¹	Socio-cultural EMBA ¹	Planning area for scientific monitoring
Entrained	100 ppb This represents potential toxic effects, particularly sub-lethal effects to highly sensitive species (NOPSEMA guidance note: A652993, April 2019). As entrained hydrocarbons are within the water column and not visible, impacts to socio-cultural receptors can be associated with ecological impacts. Therefore, entrained hydrocarbons at this threshold also represent the level at which socio-cultural impacts may occur.		hydrocarbons at this threshold Table 7-4 .
Shoreline	100 g/m ² This represents the threshold that could impact the survival and reproductive capacity of benthic epifaunal invertebrates living in intertidal habitat.	10 g/m ² This represents the volume where hydrocarbons may be visible on the shoreline but is below concentrations at which ecological impacts are expected to occur.	N/A

¹ Further details including the source of the thresholds used to define the EMBA in this table are provided in **Section 6.7.1.2**

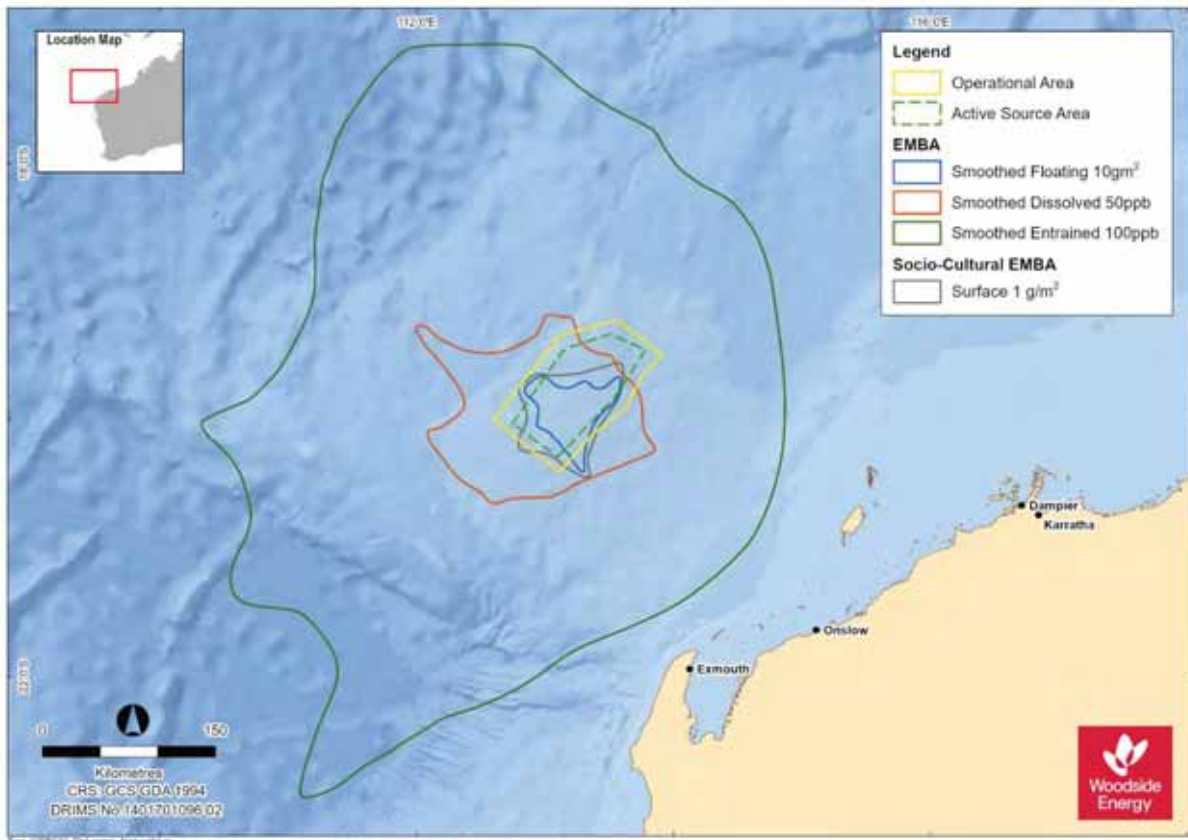


Figure 4-1: Environment that May Be Affected (EMBA) by the Petroleum Activities Program

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4.2 Regional Context

The Operational Area is located in Commonwealth waters within the North-west marine region (NWMR), as defined under the Integrated Marine and Coastal Regionalisation of Australia (IMCRA v4.0) (Commonwealth of Australia, 2006), in water depths of about 800-1150 m. Within the NWMR, the Operational Area lies within the Northwest Province (**Figure 4-2**). The EMBA partially overlaps with additional provincial bioregions of the NWMR including the Northwest Transition, Central Western Transition, Northwest Shelf Province and Central Western Shelf Transition. The southern tip of the EMBA enters the South-west Marine Region (SWMR), and Central Western Province provincial bioregion. Woodside's Description of Existing Environment (**Appendix H**) summarised the characteristics for the relevant marine bioregions.

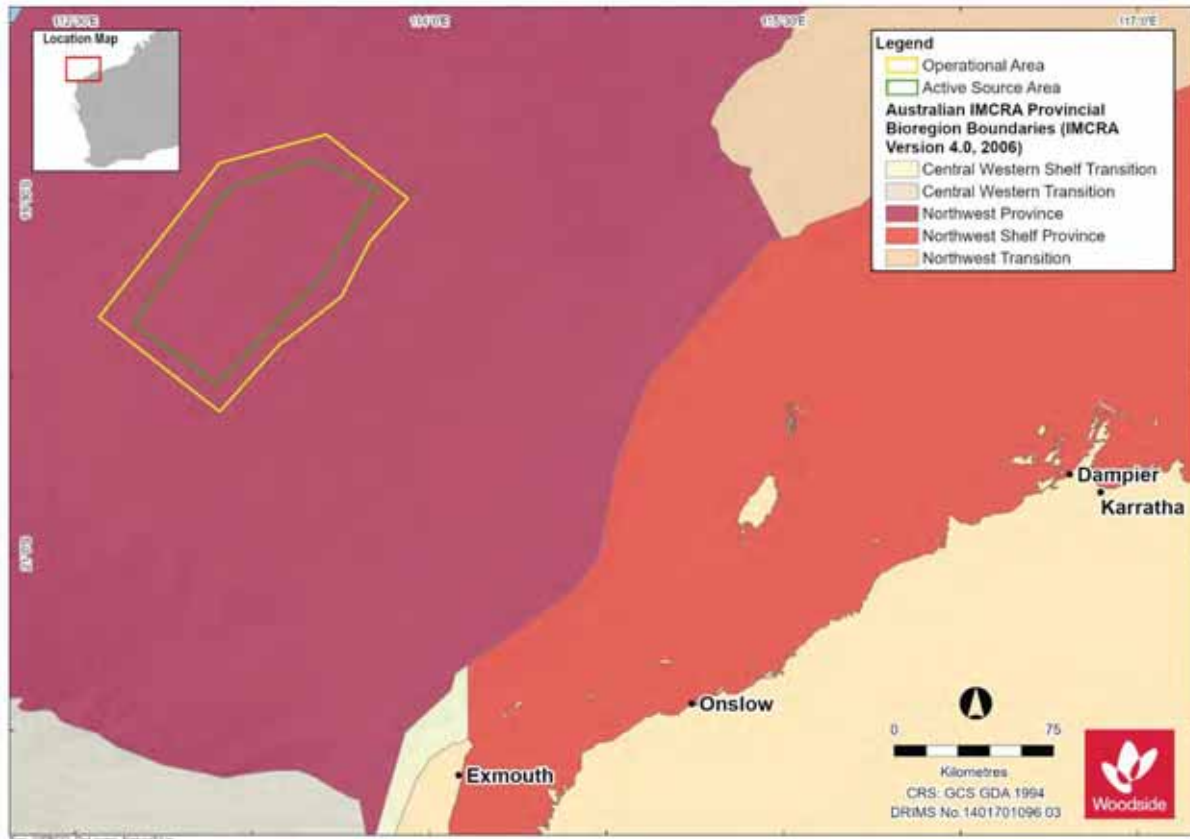


Figure 4-2: Location of the Operational Area and relevant marine bio-regions

4.3 Matters of National Environmental Significance

Table 4-2 and **Table 4-3** summarise the matters of national environmental significance (MNES) overlapping the Operational Area and EMBA, respectively, according to Protected Matters Search Tool (PMST) results (**Appendix C**). It should be noted that the EPBC Act PMST is a general database that conservatively identifies areas in which protected species have the potential to occur.

Additional information on these MNES are provided in subsequent sections of this chapter and described in detail in **Appendix H**.

Table 4-2: Summary of MNES identified by the EPBC Act PMST as potentially occurring within the Operational Area

MNES	Number	Description
World Heritage Properties	None	The closest World Heritage Property is the Ningaloo Coast World Heritage Property, located approximately 168 km SSE of the Operational Area.
National Heritage Places	None	The closest National Heritage Place is the Ningaloo Coast, located approximately 168 km SSE of the Operational Area.
Wetlands of International Importance (Ramsar)	None	The closest Ramsar wetland is Eighty Mile Beach, located approximately 615 km east of the Operational Area.
Commonwealth Marine Area	1	Generally, the Commonwealth Marine Area (EEZ) stretches from 3 nm to 200 nm from the coast. The Operational Area is located within the NWMR.
Listed Threatened Ecological Communities	None	No Threatened Ecological Communities (TECs) as listed under the EPBC Act are known to occur within the marine waters of the NWMR (Appendix H: Section 10.6).
Listed Threatened Species	14	Threatened species that were identified by the PMST as potentially occurring within the Operational Area are identified in Sections 4.6.1 to 4.6.4 and described in Appendix H: Sections 5–8 .
Listed Migratory Species	26	Migratory species that were identified by the PMST as potentially occurring within the Operational Area are identified in Sections 4.6.1 to 4.6.4 and described in Appendix H: Sections 5–8 .

Table 4-3: Summary of MNES identified by the EPBC Act PMST as potentially occurring within the EMBA

MNES	Number	Description
World Heritage Properties	None	There are no World Heritage Properties located within the EMBA.
National Heritage Places	None	There are no National Heritage Places located within the EMBA.
Wetlands of International Importance (Ramsar)	None	There are no Ramsar wetlands located within the EMBA.
Commonwealth Marine Area	2	The EMBA overlaps with the NWMR and SWMR.
Listed Threatened Ecological Communities	None	No Threatened Ecological Communities (TECs) as listed under the EPBC Act are known to occur within the marine waters of the NWMR (Appendix H: Section 10.6).
Listed Threatened Species	27	Threatened species that were identified by the PMST as potentially occurring within the EMBA are identified in Sections 4.6.1 to 4.6.4 and described in Appendix H: Sections 5–8 .
Listed Migratory Species	43	Migratory species that were identified by the PMST as potentially occurring within the EMBA are identified in Sections 4.6.1 to 4.6.4 and described in Appendix H: Sections 5–8 .

4.4 Physical Environment

The Operational Area is located entirely on the 'Exmouth Plateau' Key Ecological Feature (KEF), in water depths ranging from about 800 to 1150 m (**Figure 4-3**). The Exmouth Plateau is a distinctive geomorphic feature containing topographic features including terraces, canyons and pinnacles (DEWHA, 2008). The topography of the Exmouth Plateau is thought to modify deep water flow and

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contribute to upwelling of deep nutrient-rich waters, as well as provide conduits for moving sediment from the plateau surface to the abyss (DoEE n.d.).

Appendix H: Section 2 provides a summary of the physical characteristics of the environment within the Operational Area. The Operational Area is influenced by ocean currents as described in **Appendix H: Section 2.3**, which also provides a summary of the physical characteristics of the environment within the wider EMBA.

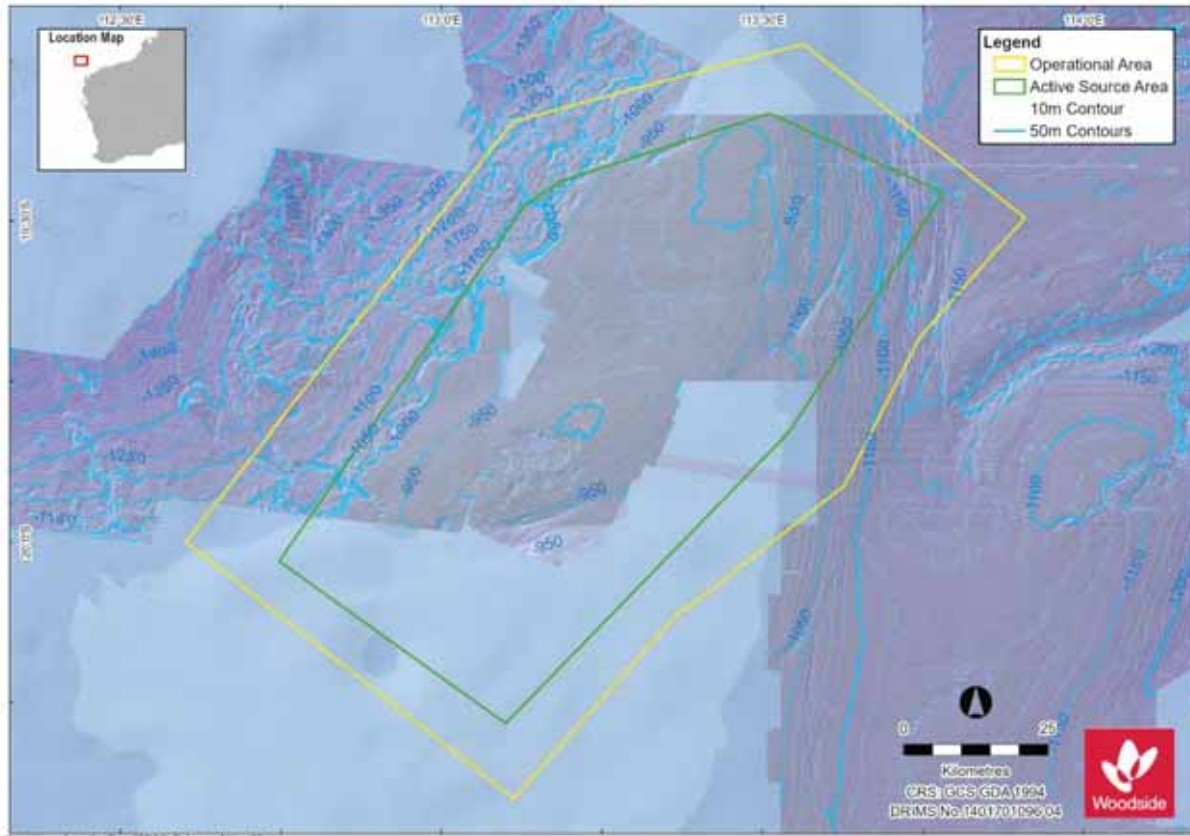


Figure 4-3: Bathymetry of the Operational Area

4.5 Habitats and Biological Communities

The benthic habitat associated with the deep water (>800 m), fine grain soft sediments in the Operational Area include fauna living within the sediments (infauna) and those living on or above the seabed (sessile and mobile epifauna). A remotely operated vehicle (ROV) survey conducted by Woodside at four well-sites (Toro-1, Steel Dragon-1, Hanover South and Anhalt-1) in waters between 821 and 2038 m depths off the coast of WA identified benthic associated species across the four distinct sites (Bryce et al., 2015). At the ROV survey location (Toro-1, located around 115 km SSE of the Operational Area) most consistent with the depths, sediment and geomorphology of the Operational Area, benthic fauna encountered were mostly echinoderms (e.g. sea cucumbers and sea stars), with distinct signs of infaunal bioturbators and potential mounds created by burrowing fish also noted, however abundance was found to be generally low. Benthic filter feeders and other epifauna and infauna are likely to inhabit the Operational Area, however the deep water depths and the presence of mostly fine grained sediments with a lack of hard substrate suggest abundances and diversity will be low, and consistent with much of the broader Northwest Province.

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The Operational Area lies within the Exmouth Plateau KEF, an area that contributes to the productivity of the region driven by upwelling of deep nutrient-rich waters. The plateau's surface is rough and undulating at 900–1000 m depth (DoEE, n.d.). The Exmouth Plateau is generally an area of low habitat heterogeneity; however, it is likely to be an important area of biodiversity as it provides an extended area offshore for communities adapted to depths of around 1000 m (DOEE, n.d.). Additionally, the Operational Area overlaps entirely with the Northwest Province, which typically supports a low abundance, richness and diversity of benthic communities (Heyward et al., 2001).

No Critical Habitats or Threatened Ecological Communities as listed under the EPBC Act are known to occur within the Operational Area.

Key habitats and ecological communities within the EMBA are identified in **Table 4-4** and described in **Appendix H**.

Table 4-4: Key Habitats within the EMBA

Habitat/Community	Key locations within the EMBA
Marine primary producers	
Coral	Key locations for coral/habitat communities within the EMBA are at Rankin Bank, approximately 180 km east of the Operational Area. Refer to Appendix H: Section 4 for a description of coral communities in the NWMR.
Seagrass beds and macroalgae	There are no recognised key locations for seagrass beds and macroalgae habitat/communities within the EMBA.
Mangroves	Shoreline accumulation of hydrocarbons is not expected above ecological thresholds and therefore no mangrove systems occur within the EMBA.
Sandy beaches	Shoreline accumulation of hydrocarbons is not expected above ecological thresholds and therefore no sandy beaches occur within the EMBA.
Salt marshes	Shoreline accumulation of hydrocarbons is not expected above ecological thresholds and therefore no salt marshes occur within the EMBA.
Other communities and habitats	
Plankton	Plankton within the Operational Area is expected to reflect the conditions of the NWMR. Primary productivity of the NWMR appears to be largely driven by offshore influences, with periodic upwelling events and cyclonic influences driving coastal productivity with nutrient recycling and advection. Refer to Appendix H: Section 4.3 for a description of planktonic communities in the NWMR.
Pelagic and demersal fish populations	In the EMBA, fish diversity and abundance is typically correlated with habitat distribution, with complex habitats, such as coral and rocky reefs, hosting more diverse and abundant assemblages. Notable habitats hosting diverse fish assemblages include the Continental slope demersal fish communities KEF. Refer to Appendix H: Section 5.5 for a description of pelagic and demersal fish populations in the NWMR.
Epifauna and infauna	The EMBA contains deep water habitats dominated by soft, fine grain sediments and sparse benthic biota. The benthic communities are characterised by benthic filter feeders and other epifauna, and infaunal bioturbators. Refer to Appendix H: Section 5.5 for a description of epifauna and infauna in the NWMR.

4.6 Protected Species

A total of 40 EPBC Act listed species considered to be MNES were identified as potentially occurring within the EMBA of which a subset of 24 species were identified as potentially occurring within the Operational Area. The full list of marine species identified from the PMST reports is provided in **Appendix C**, including several MNES that are not considered to be credibly impacted (e.g. terrestrial species within the EMBA). Criteria for determining species to be considered for impact assessment is outlined in **Appendix H: Section 3.2**. Two conservation dependent species have also been

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identified with a potential to occur within the Operational Area and EMBA; the scalloped hammerhead shark and the southern bluefin tuna. Species identified as potentially occurring within the Operational Area and EMBA and Biologically Important Areas (BIAs) or Habitat Critical to their Survival (Habitat Critical) that overlap the EMBA are listed in **Table 4-5** to **Table 4-13**, and a description of species is included in **Appendix H**. **Figure 4-4** to **Figure 4-8** show the spatial overlap with relevant BIAs and Habitat Critical areas and the EMBA.

4.6.1 Fish, Sharks and Rays

Table 4-5: Threatened and Migratory fish, shark and ray species predicted to occur within the Operational Area and EMBA

Species name	Common name	Threatened status	Migratory status	Potential for interaction	
				Operational Area	EMBA
<i>Anoxypristis cuspidata</i>	Narrow sawfish	N/A	Migratory	N/A	Species or species habitat may occur
<i>Carcharias taurus</i>	Grey nurse shark	Vulnerable	N/A	N/A	Species or species habitat known to occur
<i>Carcharhinus longimanus</i>	Oceanic whitetip shark	N/A	Migratory	Species or species habitat may occur	Species or species habitat likely to occur
<i>Carcharodon carcharias</i>	Great white shark	Vulnerable	Migratory	Species or species habitat may occur	Species or species habitat known to occur
<i>Isurus oxyrinchus</i>	Shortfin mako	N/A	Migratory	Species or species habitat likely to occur	Species or species habitat likely to occur
<i>Isurus paucus</i>	Longfin mako	N/A	Migratory	Species or species habitat likely to occur	Species or species habitat likely to occur
<i>Lamna nasus</i>	Mackerel shark	N/A	Migratory	N/A	Species or species habitat may occur
<i>Manta alfredi</i>	Reef manta ray	N/A	Migratory	N/A	Species or species habitat known to occur
<i>Manta birostris</i>	Giant manta ray	N/A	Migratory	Species or species habitat may occur	Species or species habitat known to occur
<i>Pristis clavate</i>	Dwarf sawfish	Vulnerable	Migratory	N/A	Species or species habitat known to occur
<i>Pristis pristis</i>	Freshwater sawfish	Vulnerable	Migratory	N/A	Species or species habitat likely to occur
<i>Pristis zijsron</i>	Green sawfish	Vulnerable	Migratory	N/A	Species or species habitat known to occur
<i>Rhincodon typus</i>	Whale shark	Vulnerable	Migratory	N/A	Foraging, feeding or related behaviour known to occur

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Species name	Common name	Threatened status	Migratory status	Potential for interaction	
				Operational Area	EMBA
Sphyrna lewini	Scalloped Hammerhead	Conservation Dependant	N/A	Species or species habitat may occur	Species or species habitat likely to occur
Thunnus maccoyii	Southern Bluefin Tuna	Conservation Dependant	N/A	Breeding known to occur	Breeding known to occur

Table 4-6: Fish, shark and ray BIAs within the EMBA

Species	BIA type	Approximate distance and direction of BIA from Operational Area (km)
Whale shark	Foraging (northward from Ningaloo along 200 m isobath)	136 km south-east

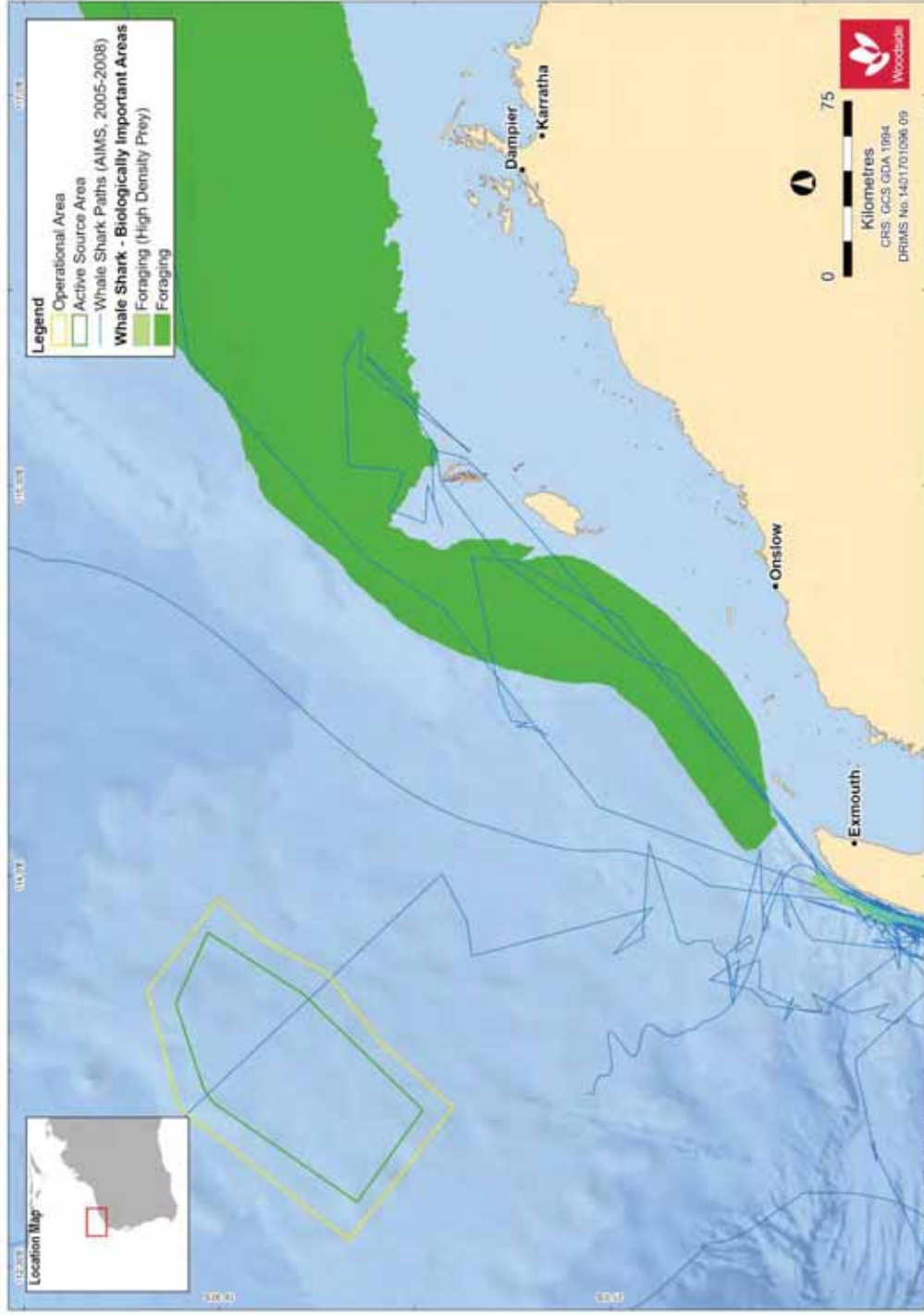


Figure 4-4: Whale shark BIA and satellite tracks of whale sharks tagged between 2005 and 2008 (Meekan and Radford, 2010)

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4.6.2 Marine Reptiles

Table 4-7: Threatened and Migratory marine reptile species predicted to occur within the Operational Area and EMBA

Species name	Common name	Threatened status	Migratory status	Potential for interaction	
				Operational Area	EMBA
Caretta caretta	Loggerhead turtle	Endangered	Migratory	Species or species habitat likely to occur	Species or species habitat known to occur
Chelonia mydas	Green turtle	Vulnerable	Migratory	Species or species habitat likely to occur	Species or species habitat known to occur
Dermochelys coriacea	Leatherback turtle	Endangered	Migratory	Species or species habitat likely to occur	Species or species habitat known to occur
Eretmochelys imbricata	Hawksbill turtle	Vulnerable	Migratory	Species or species habitat likely to occur	Species or species habitat known to occur
Natator depressus	Flatback turtle	Vulnerable	Migratory	Species or species habitat likely to occur	Congregation or aggregation known to occur

Table 4-8: Marine turtle BIAs adjacent to the EMBA

Species	BIA type	Approximate distance and direction of BIA from Operational Area
Flatback turtle	Internesting buffer (Montebello Island, Hermite Island, NW Island, Trimouille Island)	135 km south-east
	Internesting buffer (Thevenard Island – South coast)	149 km south-east
Green turtle	Internesting buffer (Montebello Islands)	170 km south-east
	Internesting buffer (north and south Muiron Island)	170 km south-east
	Internesting buffer (Montebello Island, Hermite Island, NW Island, Trimouille Island)	174 km south-east
Hawksbill turtle	Internesting buffer (Middle Island, west coast Barrow Island, west coast and north coast)	181 km south-east
	Internesting buffer (Montebello Island, Hermite Island, NW Island, Trimouille Island)	174 km south-east
Loggerhead turtle	Internesting buffer (Barrow Island)	181 km south-east
	Internesting buffer (Montebello Islands)	187 km east

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Table 4-9: Internesting Habitat Critical to the survival of marine turtle species predicted to occur within or adjacent to the EMBA

Species	Genetic stock	Nesting locations	Approximate distance and direction from Operational Area	Inter-nesting buffer	Nesting period	Hatching period
Green turtle	North West Shelf	Adele Island, Maret Island, Cassini Island, Lacepede Islands, Barrow Island, Montebello Islands (all with sandy beaches), Serrurier Island, Dampier Archipelago, Thevenard Island, North-west Cape, Ningaloo coast	175 km south-east	20 km	Nov-Mar	Jan-May (peak: Feb-Mar)
Flatback turtle	Pilbara	Montebello Islands, Mundabullangana Beach, Barrow Island, Cemetery Beach, Dampier Archipelago (including Delambre Island and Huay Island), coastal islands from Cape Preston to Locker Island.	147 km south-east	60 km	Oct-Mar (peak: Feb-Mar)	Oct-Mar
Hawksbill turtle	Western Australia	Dampier Archipelago (including Rosemary Island and Delambre Island), Montebello Islands (including Ah Chong Island, South East Island and Trimouille Island), Lowendal Islands (including Varanus Island, Beacon Island and Bridled Island), Sholl Island	175 km south-east	20 km	All year (peak: Oct-Feb)	All year (peak: Dec-Feb)
Loggerhead turtle	No overlap within EMBA					
Leatherback turtle	No overlap – nesting located in Northern Territory and North Queensland					
Olive Ridley turtle	No overlap – nesting located in Northern Australia and North Queensland					

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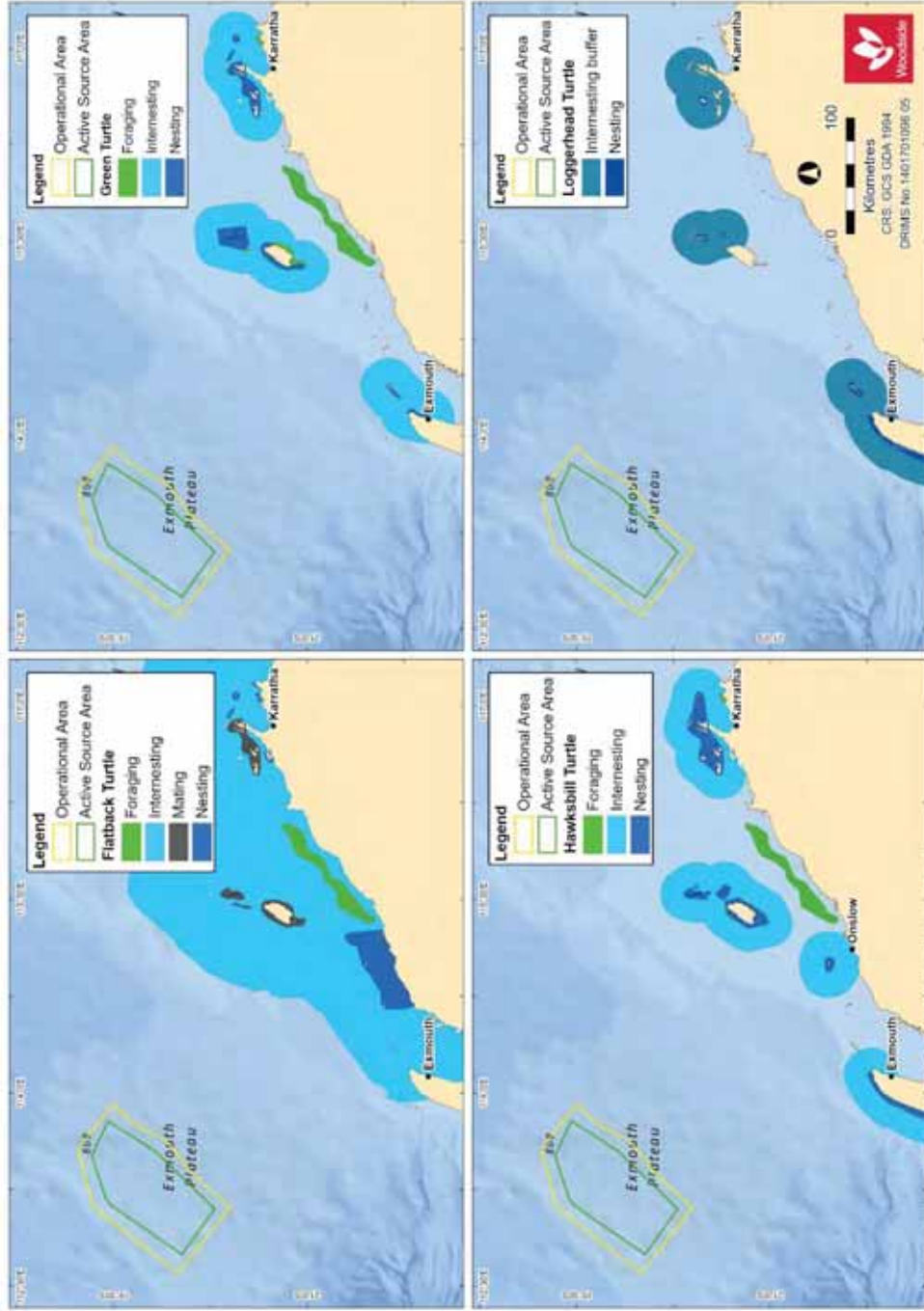


Figure 4-5: Marine reptile BIAs

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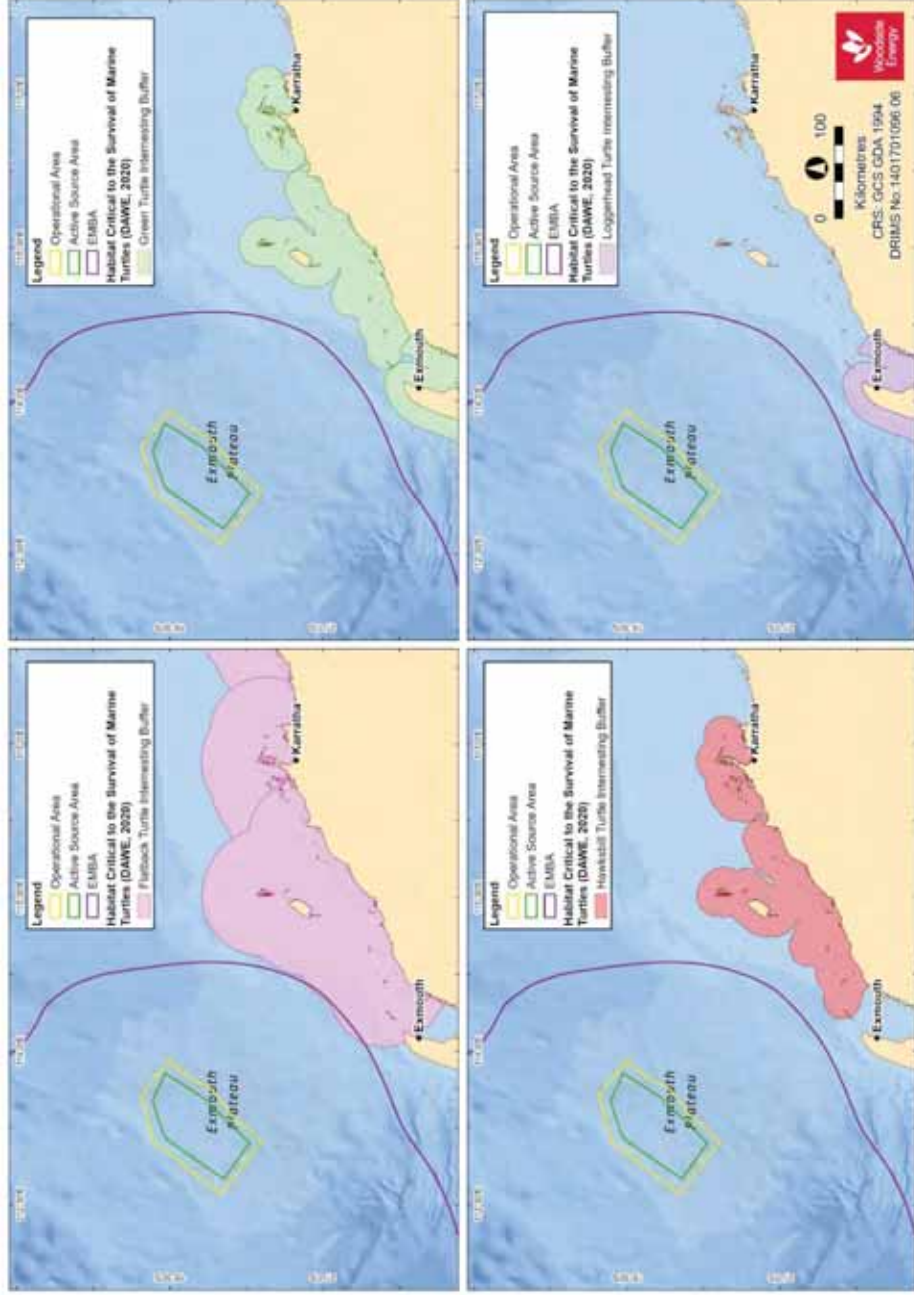


Figure 4-6: Habitat Critical to the survival of marine turtles

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4.6.3 Marine Mammals

Table 4-10: Threatened and Migratory marine mammal species predicted to occur within the Operational Area and EMBA

Species name	Common name	Threatened status	Migratory status	Potential for interaction	
				Operational Area	EMBA
<i>Balaenoptera bonaerensis</i>	Antarctic minke whale	N/A	Migratory	Species or species habitat likely to occur	Species or species habitat likely to occur
<i>Balaenoptera borealis</i>	Sei whale	Vulnerable	Migratory	Species or species habitat likely to occur	Foraging, feeding or related behaviour likely to occur
<i>Balaenoptera edeni</i>	Bryde's whale	N/A	Migratory	Species or species habitat likely to occur	Species or species habitat likely to occur
<i>Balaenoptera musculus</i>	Blue whale	Endangered	Migratory	Species or species habitat likely to occur	Migration route known to occur
<i>Balaenoptera physalus</i>	Fin whale	Vulnerable	Migratory	Species or species habitat likely to occur	Foraging, feeding or related behaviour likely to occur
<i>Eubalaena australis</i>	Southern right whale	Endangered	Migratory	N/A	Species or species habitat may occur
<i>Megaptera novaeangliae</i>	Humpback whale	N/A	Migratory	Species or species habitat may occur	Breeding known to occur
<i>Orcinus orca</i>	Killer whale	N/A	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Physeter macrocephalus</i>	Sperm whale	N/A	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Tursiops aduncus</i>	Spotted bottlenose dolphin (Arafura/Timor Sea)	N/A	Migratory	N/A	Species or species habitat known to occur

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Table 4-11: Marine mammal BIAs within the EMBA

Species	BIA type (source: National Conservation Values Atlas (NCVA))	Approximate distance and direction from Operational Area
Pygmy blue whale	Migration (Augusta to Derby, tend to pass along the shelf edge at depths of 500 m to 1000 m; appear close to coast in the Exmouth-Montebello Islands area on southern migration), refer to Figure 4-7	14 km south-east
Humpback whale	Foraging (Ningaloo), refer to Figure 4-7 Migration (Extends from the coast to out to approximately 10 0 km offshore in the Kimberley region extending south to North-west Cape. From North-west Cape to south of Shark Bay the migration corridor is reduced to approximately 50 km (Figure 4-8).	154 km south 138 km south-east

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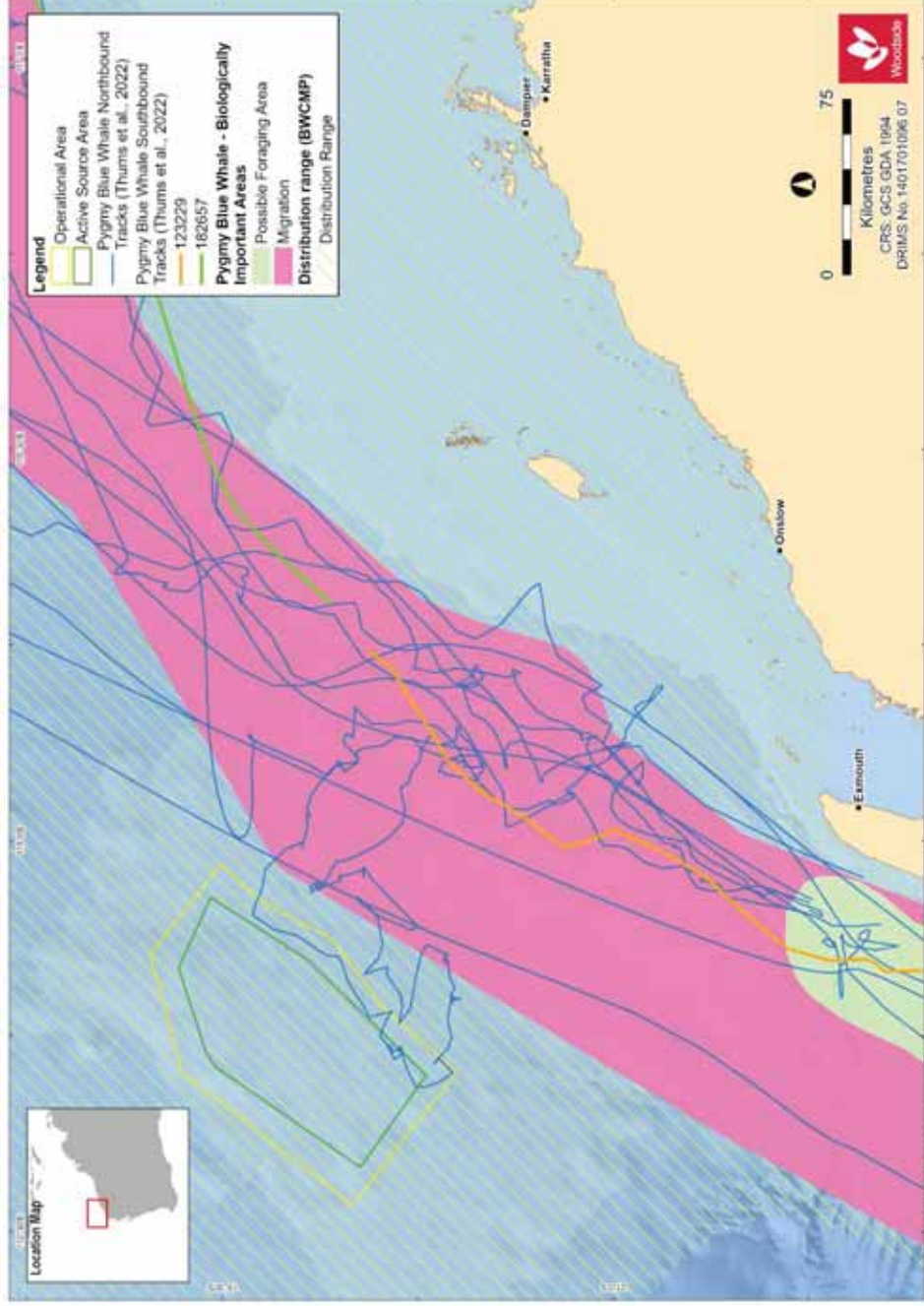


Figure 4-7: Pygmy blue whale BIA and distribution range (as per the NCV and Blue Whale Conservation Management Plan (BWCMP), respectively) with reference to the Operational Area and the 20 tracks of satellite tagged pygmy blue whales recorded in the NW of Ireland, of the 22 tracks presented in Thums et al. (2022).

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Figure 4-8: Humpback whale BIA (as per NCVA) and satellite tracks of humpback whales tagged between 2010 and 2012 (Double et al., 2010, 2012a)

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4.6.3.1 Pygmy Blue Whale

The pygmy blue whale distribution range is a spatially defined area where pygmy blue whales are known to occur based on direct observations, satellite tagged whales or based on acoustic detections (Commonwealth of Australia, 2015). The majority of the important pygmy blue whale migration areas for north-west Australia are within the migratory BIA (**Figure 4-7** and Thums et al. (2022). Thums et al. (2022) does also note that during the northern migration, the satellite tracks show the migrating whales fanning out over a wider and deeper offshore area (within and beyond the migration BIA) and this occurs in line with the northern tip of the Montebello Islands (Thums et al., 2022 and Double et al., 2014; refer to **Figure 4-7**).

The Active Source Area for the Petroleum Activities Program is located ~25 km west of the western boundary of the pygmy blue whale migration BIA, and both the Active Source Area and Operational Area overlap with the pygmy blue whale distribution range (refer to **Figure 4-7**; **Figure 4-9**).

The pygmy blue whale distribution range is a spatially defined area where pygmy blue whales are known to occur based on direct observations, satellite tagged whales or based on acoustic detections (Commonwealth of Australia, 2015). Thums et al. (2022) acknowledged that the majority of important migration areas for north-west Australia were encompassed by the pygmy blue whale migration BIA, as shown by 20 tracks for northbound pygmy blue whale, as presented in **Figure 4-7**. Furthermore, the analysis identified areas off from Ningaloo Reef to the Rowley Shoals as important for foraging (and/or breeding/resting) using the overlay of three modelled metrics (occupancy, number of whales and move persistence) by Thums et al. (2022). These include areas within and to the west of the migration BIA. The possibility that some migrating pygmy blue whales could be opportunistically foraging to the west of the migration BIA is supported by the track of one northbound individual tagged off the North West Cape in early June 2020. This tagged whale spent about 486 hours (20 days) in what appeared to be opportunistic foraging movement behaviour (Thums et al. 2022; AIMS, 2022), over an area that included time in the southern area of the Exmouth Plateau and within the migration BIA, refer to **Figure 4-7**. The area in which the whales have been shown to fan out and migrate beyond the BIA (Thums et al. (2022) is north of the Active Source Area. Two southbound tracked whales also travelled predominantly within the migration BIA (refer to **Figure 4-7**).

Considering the proximity of the pygmy blue whale migration BIA to the Operational Area (14 km) and to the Active Source Area (about 25 km), as well as the recorded presence of an individual, within the distribution range which partially overlapped the Operational Area, it is possible that pygmy blue whales may transit in and around the Operational Area during migratory north and south seasons (April to July and October to January, respectively) (McCauley, 2011; Gavrilov et al., 2018; Thums et al., 2022). However, only transient individuals or small groups are expected occasionally during the north and south bound migratory seasons (April to July and October to January, respectively) (McCauley, 2011, Gavrilov et al. 2018 and Thums et al, 2022).

The Exmouth Plateau KEF (refer to **Section 4.8**) is an area of localised upwelling and may be a source of food for occasional, opportunistic pygmy blue whale foraging. Migrating pygmy blue whales display predominately relatively fast, directed travel (mean travel rate $2.8 \pm 0.8 \text{ km hr}^{-1}$) during the northbound peak period of May and June. This is indicating limited foraging behaviour; however it is interspersed with relatively short periods of slower speeds which may be indicative of opportunistic foraging (Thums et al., 2022). By contrast, acoustic detection (McCauley, 2011) suggests that whales are travelling faster during the southbound migration than during the northbound migration. Thums et al. (2022) also noted the rate of southbound travel was faster than on the northern migration (based on the tracks of two whales). However, short periods of putative foraging was noted for one whale.

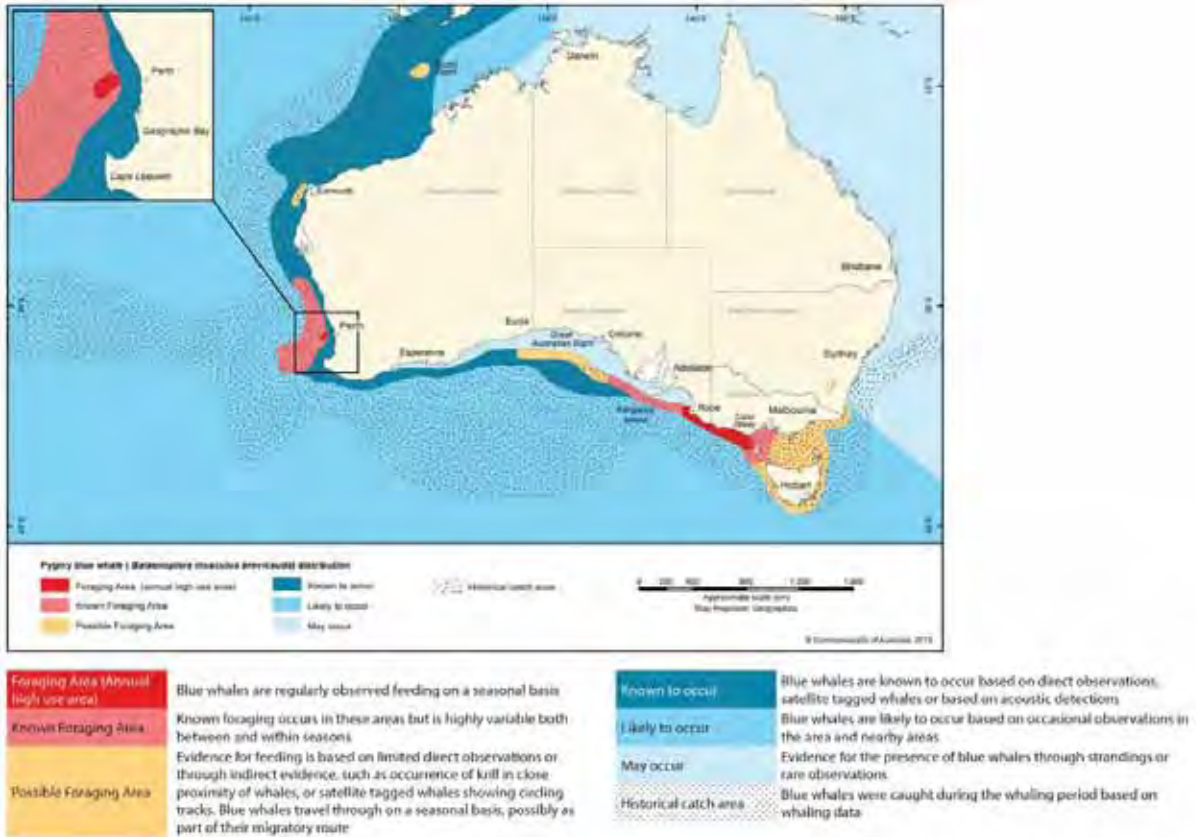


Figure 4-9: Important foraging and areas of occurrence for pygmy blue whales as presented in the Blue Whale Conservation Management Plan (Commonwealth of Australia, 2015). Note: Known to occur area in the BWCMP is the same as the distribution range presented in the National Conservation Values Atlas.

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4.6.4 Seabirds and Migratory Shorebirds

Table 4-12: Threatened and Migratory seabird and shorebird species predicted to occur within the Operational Area and EMBA

Species name	Common name	Threatened status	Migratory status	Potential for interaction	
				Operational Area	EMBA
<i>Actitis hypoleucos</i>	Common sandpiper	N/A	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Anous stolidus</i>	Common noddy	N/A	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Ardenna carneipes</i>	Flesh-footed shearwater	N/A	Migratory	N/A	Species or species habitat may occur
<i>Calidris acuminata</i>	Sharp-tailed sandpiper	N/A	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Calidris canutus</i>	Red knot	Endangered	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Calidris ferruginea</i>	Curlew sandpiper	Critically Endangered	Migratory	N/A	Species or species habitat may occur
<i>Calidris melanotos</i>	Pectoral sandpiper	N/A	Migratory	N/A	Species or species habitat may occur
<i>Calonectris leucomelas</i>	Streaked shearwater	N/A	Migratory	N/A	Species or species habitat likely to occur
<i>Fregata ariel</i>	Lesser frigatebird	N/A	Migratory	Species or species habitat may occur	Species or species habitat likely to occur
<i>Fregata minor</i>	Greater frigatebird	N/A	Migratory	N/A	Species or species habitat may occur
<i>Macronectes giganteus</i>	Southern giant petrel	Endangered	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Numenius madagascariensis</i>	Eastern curlew	Critically Endangered	Migratory	N/A	Species or species habitat may occur
<i>Pandion haliaeetus</i>	Osprey	N/A	Migratory	N/A	Species or species habitat known to occur

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Species name	Common name	Threatened status	Migratory status	Potential for interaction	
				Operational Area	EMBA
<i>Papasula abbotti</i>	Abbott's booby	Endangered	N/A	N/A	Species or species habitat may occur
<i>Phaethon lepturus</i>	White-tailed tropicbird	N/A	Migratory	Species or species habitat may occur	Species or species habitat may occur
<i>Phaethon lepturus fulvus</i>	Christmas Island White-tailed tropicbird	Endangered	N/A	N/A	Species or species habitat may occur
<i>Pterodroma mollis</i>	Soft-plumaged petrel	Vulnerable	N/A	N/A	Foraging, feeding or related behaviour likely to occur
<i>Sternula nereis nereis</i>	Australian fairy tern	Vulnerable	N/A	N/A	Foraging, feeding or related behaviour likely to occur
<i>Thalassarche carteri</i>	Indian yellow-nosed albatross	Vulnerable	Migratory	N/A	Species or species habitat may occur
<i>Thalassarche impavida</i>	Campbell Albatross	Vulnerable	Migratory	N/A	Species or species habitat may occur

N.B. The wedge-tailed shearwater was not identified in the PMST as potentially occurring within the EMBA; however, given a BIA for wedge-tailed shearwater breeding partially overlaps the EMBA, it is considered possible that the species may be encountered within the EMBA.

Table 4-13: Seabird and shorebird BIAs within the EMBA

Species	BIA type	Approximate Distance and Direction from Operational Area (km)
Wedge-tailed shearwater	Breeding and foraging (Kimberley, Pilbara and Gascoyne coasts and islands including Ashmore Reef)	85 km south-east

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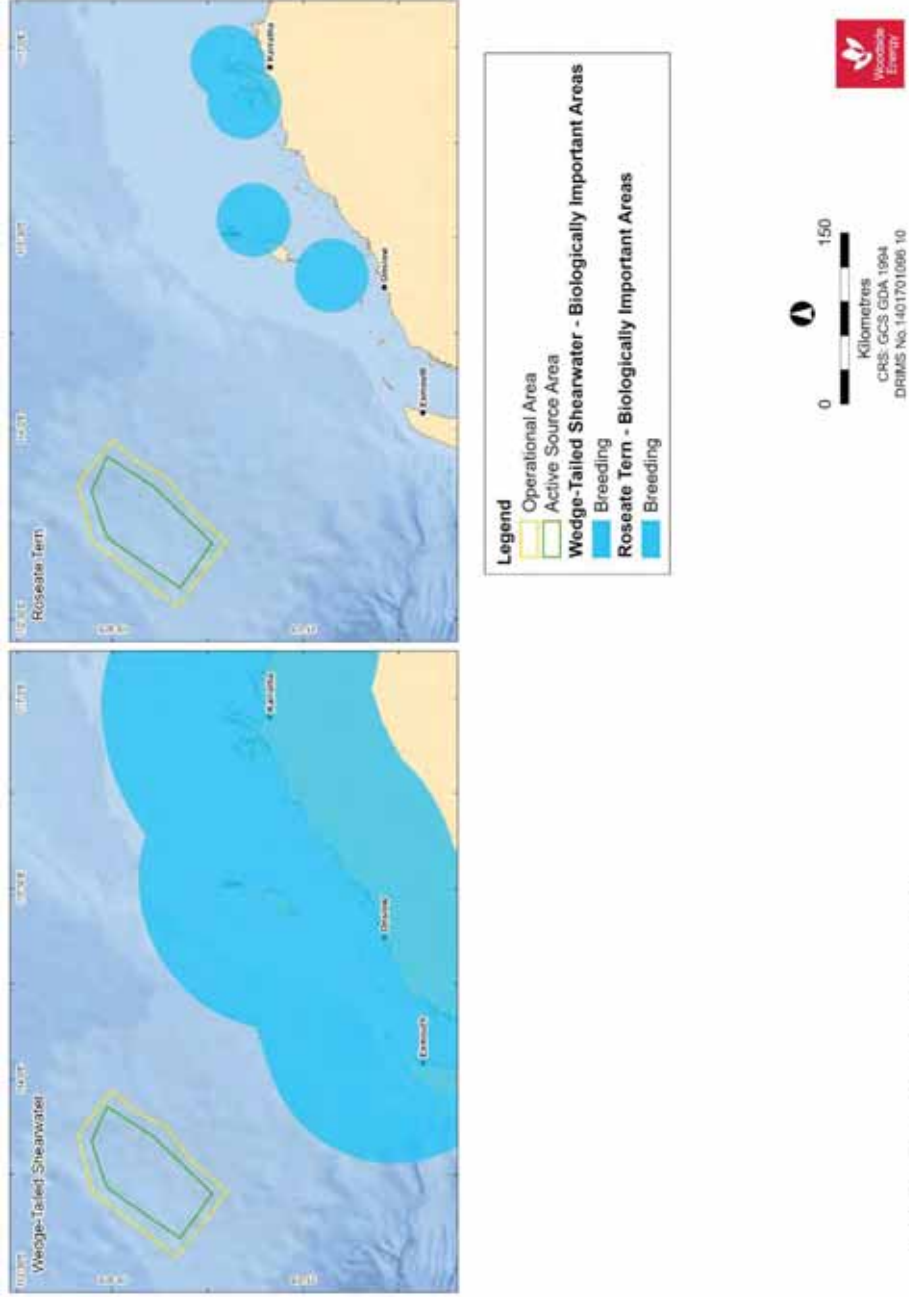


Figure 4-10: Seabird and migratory shorebird BIAs

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4.7 Seasonal Sensitivities for Protected Species

Seasonal sensitivities for protected migratory species identified as potentially occurring within the Operational Area are identified in **Table 4-14**. Movement patterns of all protected species identified in **Section 4.6** are described in **Appendix H**.

Table 4-14: Key seasonal sensitivities for protected migratory species identified potentially as occurring within the Operational Area.

Species	January	February	March	April	May	June	July	August	September	October	November	December
Fish, sharks and rays												
Whale shark – foraging (northward from Ningaloo) ¹												
Mammals												
Pygmy blue whale – northern migration (Exmouth, Montebello, Scott Reef) ²												
Pygmy blue whale – southern migration (Exmouth, Montebello, Scott Reef) ³												
Humpback whale – northern migration (Jurien Bay to Montebello) ⁴												
Humpback whale – southern migration (Jurien Bay to Montebello) ⁵												
Marine reptiles												
Green turtle (G-NWS)– various nesting areas ⁶												
Flatback turtle (F-Pil)– various nesting areas ⁶												
Hawksbill turtle (H-WA)– various nesting areas ⁶												
Loggerhead turtle (L-WA)– various nesting areas ⁶												
Seabirds												
Wedge-tailed shearwater – various breeding sites ⁷												
	Species may be present in the Operational Area											
	Peak period. Presence of animals is reliable and predictable each year											

References for species seasonal sensitivities:

¹ TSSC, 2015; Wilson et al., 2006

² DSEWPaC, 2012; McCauley and Jenner, 2010; Double et al., 2012b, 2014

³ DSEWPaC, 2012; McCauley and Jenner, 2010; Double et al., 2012b, 2014

⁴ DEH, 2005; Jenner et al., 2001; McCauley and Jenner, 2001; Double et al., 2012a

⁵ McCauley and Jenner, 2001, Jenner et al., 2001, Double et al., 2010

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⁶ DoEE, 2017a; Chevron, 2015⁷ Johnstone and Storr (1998)

4.8 Key Ecological Features (KEFs)

KEFs within the Operational Area and EMBA are identified in **Table 4-15** and described in **Appendix H**. **Figure 4-11** shows the spatial overlap with KEFs and the Operational Area and EMBA.

Table 4-15: KEFs within the Operational Area and EMBA.

Key Ecological Feature	Distance and direction from Operational Area to KEF
Exmouth Plateau	Overlaps
Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula	103 km south-east
Continental slope demersal fish communities	145 km south-east

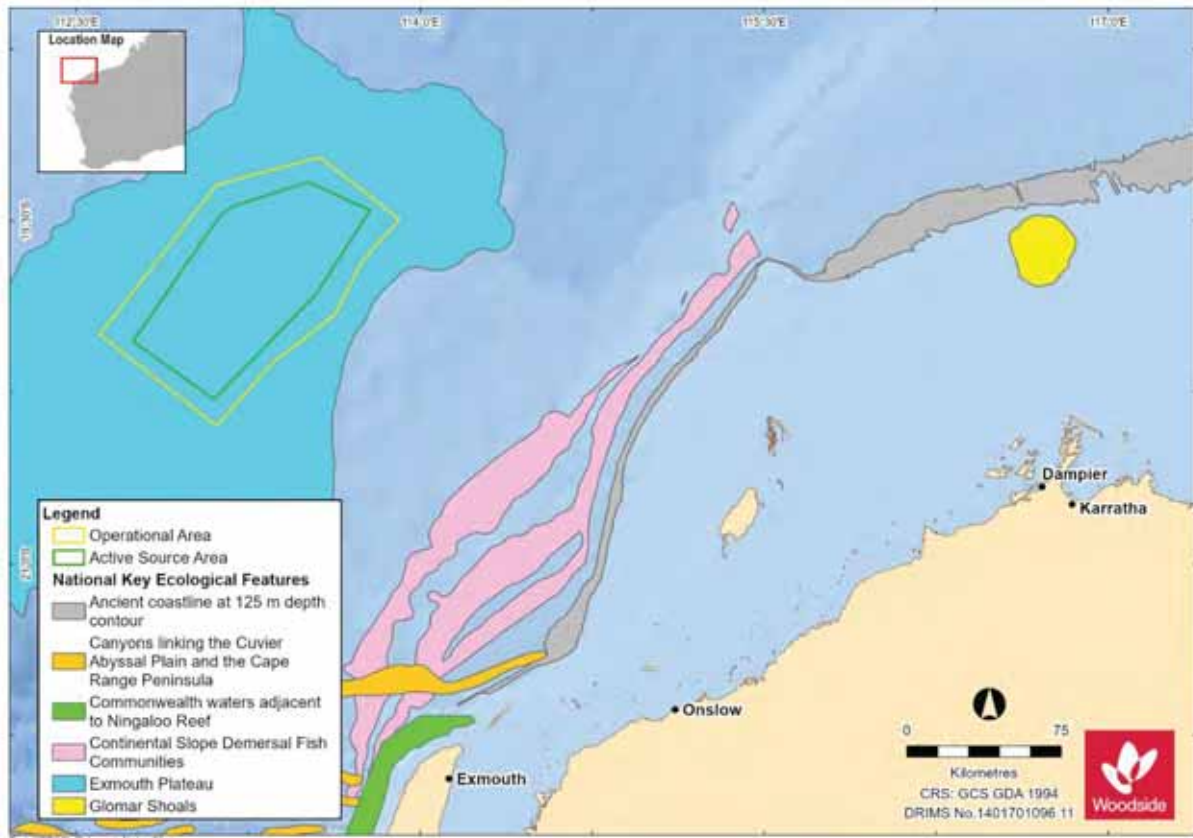


Figure 4-11: KEFs with reference to the Operational Area

4.9 Protected Places

No protected places overlap the Operational Area. Protected places within the EMBA are identified in **Table 4-16** and presented in **Figure 4-12**. **Appendix H** outlines the values and sensitivities of protected places and other sensitive areas in the EMBA.

Table 4-16: Established protected places and other sensitive areas overlapping the EMBA

	Distance and direction from Operational Area to protected place or sensitive area	IUCN category* or relevant park zone overlapping the EMBA
AMPs		
NWMP		
Gascoyne AMP	33 km south	Multiple Use Zone (IUCN VI)
	174 km south	National Park Zone (IUCN II)
	133 km south	Habitat Protection Zone (IUCN IV)
Montebello AMP ¹	170 km east	Multiple Use Zone (IUCN VI)
State Marine Parks and Nature Reserves		
Marine Parks		
None identified	N/A	N/A
Marine Management Areas		
None identified	N/A	N/A
Fish Habitat Protection Areas		
None identified	N/A	N/A
Nature Reserves		
None identified	N/A	N/A
Other sensitive areas		
None identified	N/A	N/A

*Conservation objectives for IUCN categories include:

Ia: Strict Nature Reserve

Ib: Wilderness Area

II: national Park

III: Natural Monument or Feature

IV: Habitat/Species Management Area

V: Protected Landscape

VI: Protected area with sustainable use of natural resources – allow human use but prohibits large scale development.

IUCN categories for the marine park are provided and, in brackets, the IUCN categories for specific zones within each Marine Park as assigned under the North-west Marine Parks Network Management Plan 2018 (DNP, 2018a) and South-west Marine Parks Network Management Plan 2018 (DNP, 2018b).

¹ The Montebello AMP was not predicted to be contact above hydrocarbon impact thresholds however it was included in the EMBA due to its proximity to the EMBA.

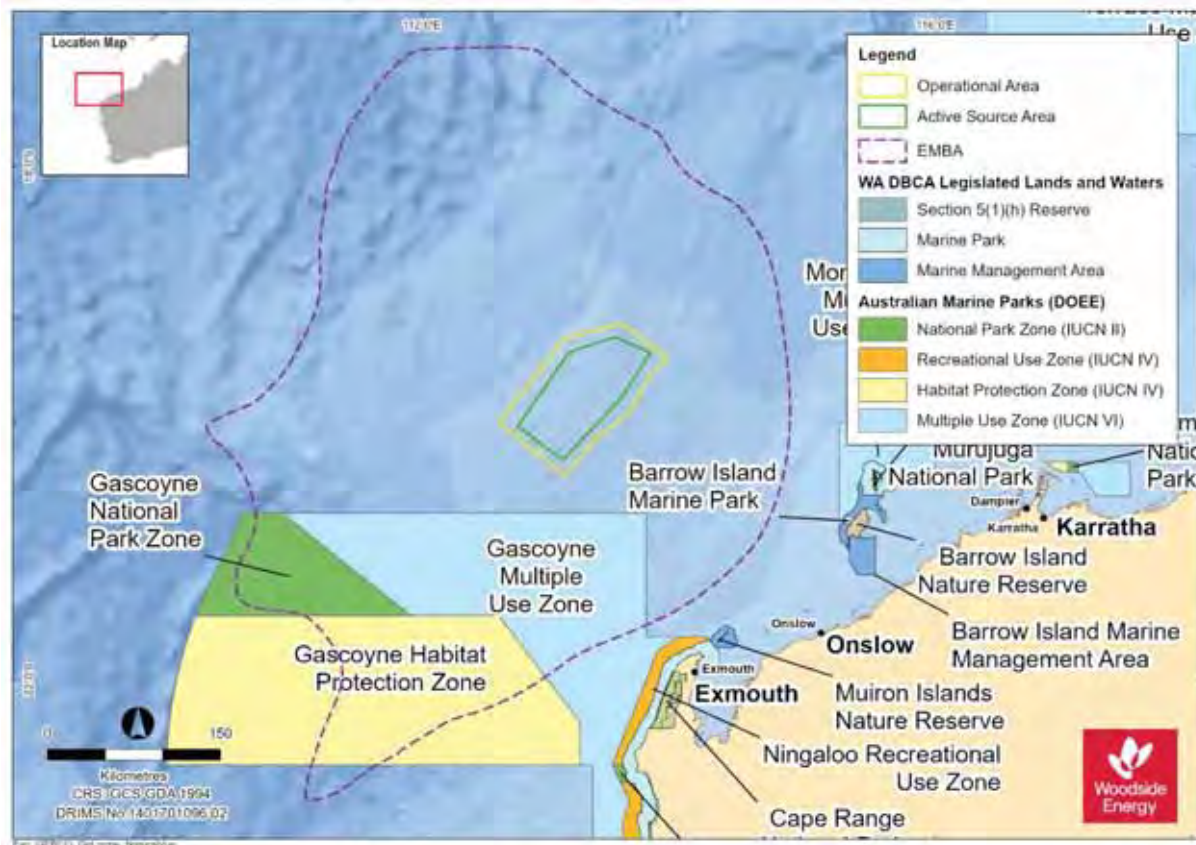


Figure 4-12: Protected Areas with reference to the Operational Area and EMBA

4.10 Socio-Economic Environment

4.10.1 Cultural Heritage

4.10.1.1 Background

Woodside recognises the 'environment' for the purpose of the evaluation required under the Environment Regulations includes:

- the heritage value of places; and
- the social, economic, and cultural features of the broader environment.

In this section, the heritage value of places within the EMBA and the cultural features of the EMBA are described.

4.10.1.2 Native Title Rights and Interests

As a starting point for understanding social and cultural features of the environment for Indigenous groups, Woodside identifies native title claims, determinations and Indigenous Land Use Agreements (ILUAs) which the EMBA overlaps. Native title claims, determinations and ILUAs are defined under the Native Title Act 1993 (Cth). Woodside considers this to be the broadest extent over which Indigenous groups have claimed native title rights and interests, while acknowledging that cultural features and heritage values may exist outside of the native title framework.

Native title claims are applications made to the Federal Court under the Native Title Act for a determination or decision about native title in a particular area. A claim is made by a native title claim

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group which asserts it holds native title rights and interests in an area of land and/or water, according to its traditional laws and customs. By making a claim, the native title claim group seeks a decision that native title exists so that its native title rights and interests are recognised by the common law of Australia. This is called a native title determination. A determination is a decision by a recognised body, such as the Federal Court or High Court of Australia, that native title either does or does not exist in relation to a particular area (Native Title Tribunal).

A requirement to establishing a positive determination of native title in court is proving that there is an organised society that occupied the land and/or waters at the time of British annexation. The requirement of an 'organised society' is set out by Justice Toohey in the historic judgment of *Mabo v Queensland (No 2)* [1992] HCA 23; (1992) 175 CLR 1 ('Mabo'). Justice Toohey had the following to say (at 187):

it is inconceivable that indigenous inhabitants in occupation of land did not have a system by which land was utilized in a way determined by that society. There must, of course, be a society sufficiently organized to create and sustain rights and duties...

Therefore, Woodside understands that native title rights and interests are held communally by an organised society, that native title claims are understood to represent the area over which Indigenous groups are claiming these rights and interests, and that native title determinations provide clarity on where native title rights and interests are found to either exist or not exist. Where native title rights or interests are determined to exist they will be held by a Registered Native Title Body Corporate (section 57, Native Title Act 1993) in trust or as agent for native title holders.

ILUAs are voluntary agreements between native title parties and other people or bodies about the use and management of land and/or waters and are registered by the Native Title Registrar in the Register of ILUAs. An ILUA can be made over areas where:

- native title has been determined to exist in at least part of the area; or
- a native title claim has been made; or
- where no native title claim has been made.
- While registered, ILUAs operate as a contract between the parties, including relevant native title holders (Native Title Tribunal).

The Native Title Act also provides for a Representative Aboriginal/Torres Strait Islander Body (Native Title Representative Body) to be recognised by the Commonwealth Minister for an area. Native Title Representative Bodies have specialist functions set out in the Native Title Act within the area for which they are the Native Title Representative Body. However, the functions of a Native Title Representative Body are such that they do not hold details on the cultural features or heritage values of an area and therefore do not inform Woodside's understanding of heritage values or cultural features.

For the activity in this EP, there are no native title claims or determinations and no ILUAs overlapping the Operational Area and EMBA (see Figure 4-13). Therefore, Woodside understands that no native title rights or interests may be impacted by the activity. A summary of native title claims, determinations and ILUAs which are coastally adjacent to the EMBA is set out in Table 4-17. Claims and determinations have not been differentiated in this table, as it is acknowledged that rights and interests may exist within either of these.

4.10.1.3 Coastally Adjacent Native Title Claims, Determinations and ILUAs

Woodside understands that Indigenous groups are keenly aware of the extent of their rights, interests and responsibilities for Country, and these are generally discrete, defined areas, including areas of sea (Smyth 2007). To identify cultural features and heritage values which may exist outside of native title claim, determination and ILUA areas, Woodside considers native title claims, determinations

and ILUAs coastally adjacent to the EMBA to be an instructive means of identifying potentially relevant Indigenous groups to be consulted (See Table 4-17).

That said, Woodside understands from engagement with stakeholders that extending a native title group's responsibility to areas which those groups have elected to not include in their claims or ILUAs can have significant cultural consequences for Indigenous groups and individuals. This may also, over time, build expectations in the broader Indigenous community that a group is responsible for maintaining environmental values in areas for which they do not hold traditional knowledge. Woodside also acknowledges that an Indigenous group's relative proximity to any Operational Areas or EMBA is not necessarily a meaningful indicator of the connection of Indigenous groups to the area, and providing advice over such areas can be culturally dangerous. As a result, caution must be used when conducting broader engagement.

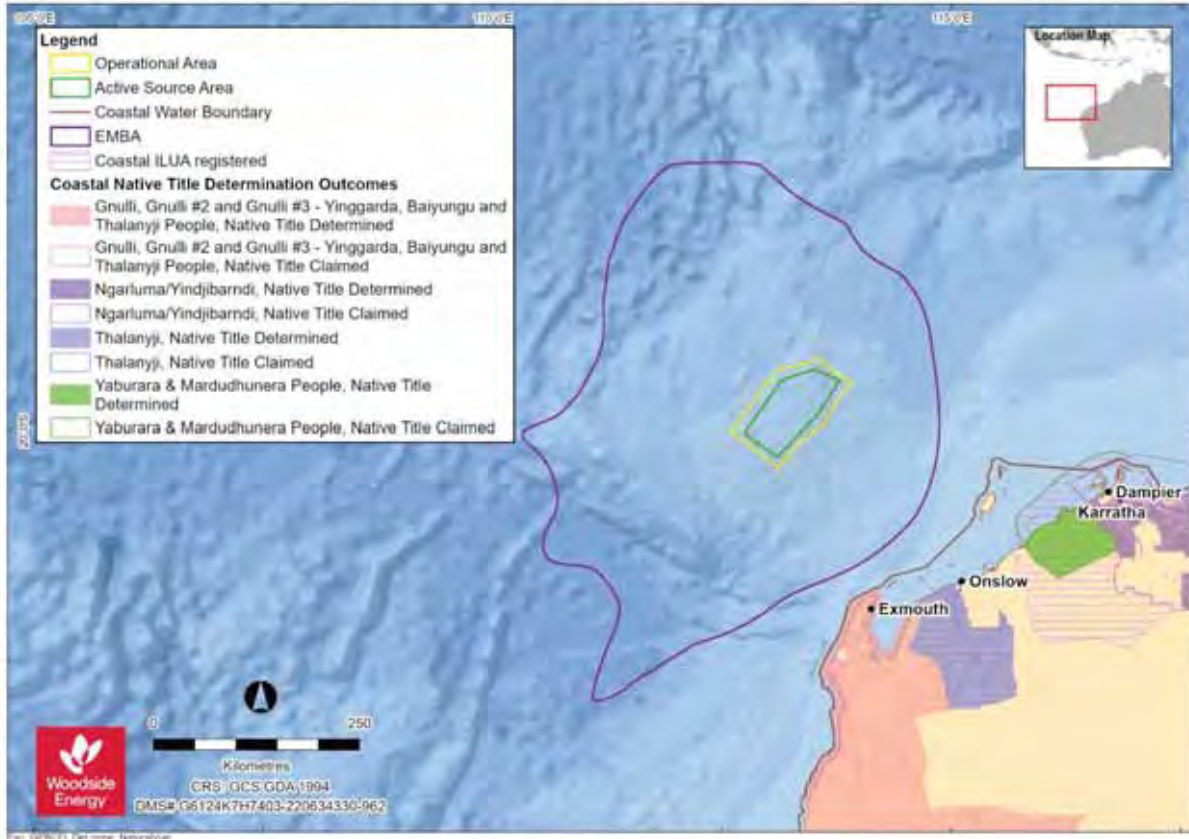


Figure 4-13 : Operational Area and EMBA in relation to native title claims, determinations and ILUAs

Table 4-17 Summary of Native Title Claims, Determinations and ILUAs which overlap or are coastally adjacent to the EMBA.

Claim / Determination / ILUA	Registered Native Title Body Corporate	Overlap with EMBA	Coastally Adjacent to the EMBA
Claim / Determination			
Gnulli, Gnulli #2 and Gnulli #3 - Yinggarda, Baiyungu and Thalanyji People	Nganhurra Thanardi Garrbu Aboriginal Corporation (NTGAC), Yinggarda Aboriginal Corporation (YAC)	No	Yes
Ngarluma/Yindjibarndi People	NAC, Yindjibarndi Aboriginal Corporation	No	Yes

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Claim / Determination / ILUA	Registered Native Title Body Corporate	Overlap with EMBA	Coastally Adjacent to the EMBA
Thalanyji	Buurabalayji Thalanyji Aboriginal Corporation (BTAC)	No	Yes
Yaburara & Mardudhunera People	Wirrawandi Aboriginal Corporation (WAC)	No	Yes
ILUA			
Cape Preston Project Deed (YM Mardie ILUA)	WAC	No	Yes
Cape Preston West Export Facility	WAC	No	Yes
KM & YM ILUA	WAC, Robe River Kuruma Aboriginal Corporation	No	Yes
Kuruma Marthudunera and Yaburara and Coastal Mardudhunera Indigenous Land Use Agreement	No representative body specified.	No	Yes
Macedon ILUA	BTAC	No	Yes
Ningaloo Conservation Estate ILUA	NTGAC	No	Yes
RTIO Ngarluma ILUA (Body Corporate Agreement)	NAC	No	Yes
RTIO Kuruma Marthudunera People ILUA	Robe River Kuruma Aboriginal Corporation	No	Yes

4.10.1.4 Marine Parks

Woodside acknowledges that Commonwealth and State Marine Park Management Plans have sought to recognise cultural values of Indigenous groups. Australian Marine Parks (AMP) describe this framework in the following way: 'when making decisions about what can occur in marine parks and what action we will take to protect marine parks, we take values into account'. AMP summarises these values as natural values, cultural values, heritage values and socio-economic values.

Woodside considers the management plans of marine parks that overlap the Operational Area and EMBA to determine whether cultural features and heritage values have been identified and whether there are Traditional Custodians or representative bodies referenced to contact regarding potential cultural values.

The Operational Area does not overlap any Commonwealth Marine Parks. The EMBA overlaps with features of the Gascoyne AMP managed under the North-West Marine Parks Network Management Plan 2018. The Operational Area and the EMBA do not overlap any State Marine Parks. Where these plans specify identifiable representative bodies who may hold knowledge of heritage values or cultural features—including but not limited to Registered Native Title Bodies Corporate—these bodies are consulted (See Table 5-2). Consultation with these groups may identify heritage values and cultural features beyond those addressed in the marine park management plans. No identifiable representative bodies were specified for the marine park overlapped by the EMBA (See Table 4-18).

The marine park management plans did note for the Gascoyne AMP that the Yamatji Marlpa Aboriginal Corporation (YMAC) is the relevant Native Title Representative Body. YMAC was requested to identify Traditional Custodians who may hold knowledge of heritage values or cultural features (See Table 5-4).

Table 4-18: Summary of Commonwealth and State Marine Park management Plans with EMBA overlap

Marine Park Management Plan	Operational Area Overlap	EMBA Overlap	Specified Bodies
Commonwealth Marine Park Management Plan			
Gascoyne AMP	No	Yes	No identifiable body specified.
State Marine Park Management Plan			
[None]			

In the management plans for the AMPs it is noted that “Sea country is valued for Indigenous cultural identity, health and wellbeing.” Cultural identity is understood to refer to the fact that “essence of being a ‘Saltwater’ person is ontological rather than merely technological. That is, it is about how people relate spiritually to the sea and engage with spiritual forces that created it, the marine flora and fauna and people.” (McDonald and Phillips, 2021) This connection may be damaged where people are displaced or disrupted (e.g. during colonisation) or where there is a loss of technical skills or environmental knowledge (McDonald and Phillips, 2021) however no impacts of this nature are considered to arise from this Petroleum Activities Program.

4.10.1.5 Marine Ecosystems

Woodside recognises the potential for marine ecosystems to include cultural features as well as environmental values. This is one aspect of the broader concept of “sea country”, which can be defined as the area of sea over which an Indigenous group has interests, cultural value, connection and use. It has been noted that “the saltwater peoples of the north-west are associated with discrete clan estates or tribal areas, often referred to in contemporary Aboriginal English as ‘saltwater country’ or ‘sea country’. ‘Country’ refers to more than just a geographical area: it is shorthand for all the values, places, resources, stories and cultural obligations associated with that geographical area.” (Smyth 2007). It necessarily follows that an impact to marine ecosystems has the potential to impact cultural features where the impact is detectable within Sea Country—the seascape which Traditional Custodians view, interact with or hold knowledge of. The link between environmental protection and cultural heritage protection is illustrated in the Australian Government’s Indigenous Protected Areas Program. The Indigenous Protected Areas program provides for “areas of land and sea managed by Indigenous groups as protected areas for biodiversity conservation...IPAs deliver environmental benefits...Managing IPAs also helps Indigenous communities protect the cultural values of their country for future generations...” (DCCEEW, 2023). This intrinsic link concept is also described in MAC (2021) as it relates to the values of the marine environment that are of cultural importance to MAC based on engagement with their Elders and Murujuga Land and Sea Unit Rangers. Elders were clear that all living things in Mermaid Sound are connected and that Mermaid Sound and Dampier Archipelago (Murujuga) are considered one place where the entire environment and all ecosystems hold both cultural and environmental value, with these types of values (cultural and environmental) intrinsically linked (MAC, 2021 also cited in Woodside 2023).

McNiven (2004) suggests that “For those mainland groups whose exploitation of the sea was limited to littoral resources, it is likely that seascapes extended no more than c. 20–30km out to sea, out to the horizon and the limit of human visibility. ... However, in some coastal places, clouds that can be seen well over 100km out to sea are imbued with spiritual significance. For those groups with elaborate canoe technology, seascapes extend well over the horizon.” While there is some evidence of traditional watercraft in Australia’s North West, the recorded evidence is limited to travel across inland rivers (e.g. Barber and Jackson 2011) or travel between coastal islands (Paterson et al 2019). The process for identifying Indigenous groups who may have interests and connection in Sea Country are set out in Section 4.10.1.2 and Section 5.7. The scope of advice Traditional Custodians

were encouraged to provide through ethnographic surveys (see Section 4.10.1.7) or through project consultation was not limited by reference to any particular boundaries or limits of sea country.

Cultural features of coastal areas may include marine species (e.g., humpback whales, turtles and dugongs) that may travel many thousands of kilometres through areas with similar cultural values to multiple Indigenous language groups. For example, a humpback whale may travel 5,000 km from Antarctica to the Kimberley region of Western Australia (Double et al., 2010, 2012), passing Indigenous language groups along the entire west coast of Australia.

As set out above, an impact to marine ecosystems has the potential to impact cultural values where the impact is detectable within Sea Country. Woodside considers that impact to cultural values of marine species will be adequately managed in areas of traditional Sea Country, and therefore management of the environmental values will preserve the cultural values of environmental receptors, as assessed in Section 6.

During consultation, BTAC advised it has a cultural obligation to care for the environmental values of sea country (See Table 5-4). BTAC has not provided further detail regarding cultural features or heritage values of the Operational Area or the EMBA.

Woodside has committed to ongoing engagement to further understand these values. Should feedback be received (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).

No other cultural features or heritage values related to marine species within the Operational Area or EMBA were raised by Traditional Custodians in the course of preparing the EP.

4.10.1.6 Indigenous Archaeological Heritage Assessment

Woodside understands that communal cultural connection may exist between Traditional Custodians and land and waters. It is understood from the onshore archaeological record that Aboriginal people have occupied the Australian continent for at least 65,000 years (Clarkson et al 2017) and in many places maintain a strong continuing connection that is said to extend back in Indigenous cosmology to the beginning of time.

It is understood that the sea level has risen significantly during the 65,000 years of Indigenous occupation, and areas that were once inhabited are now submerged on the continental shelf (Veth et al 2019; UWA 2021). The Ancient Coastline KEF at 125 m depth contour represents the lowest sea level during Indigenous occupation (O’Leary et al 2020; see also Williams et al 2018; UWA 2021). Archaeological material preserved on the Ancient Landscape has the potential to provide further information about the earliest periods of human occupation (Veth et al 2019; UWA 2021).

Recent archaeological discoveries demonstrate that the now submerged landscape was occupied and inhabited, and can retain archaeological material from this time (Benjamin et al, 2020; see Ward et al 2021 for an opposing view).

In recognition of this, Woodside considers the Ancient Landscape between the mainland and the Ancient Coastline KEF (see Figure 4-12) as an area where potential Indigenous archaeological material may exist on the seabed, as this covers the full extent of this possible Indigenous occupation. The Operational Area does not overlap the Ancient Landscape. There is slight overlap of the EMBA with the Ancient Landscape but no potential for seabed disturbance from planned activities and therefore no potential for impacts to archaeological material.

Known Indigenous heritage places including archaeological sites may be protected under the Aboriginal and Torres Strait Islander Heritage Protection Act 1984, Underwater Cultural Heritage Act 2018 or EPBC Act 1999. However, these Acts only extend protection to heritage places specified by declaration or otherwise included on a statutory list. Woodside understands that there is no

Indigenous archaeology known to exist anywhere within Commonwealth waters, and no declarations or prescriptions under these Acts are located within the EMBA.

For this EP, a search of DPLH's Aboriginal Heritage Inquiry System was undertaken, which showed no registered Aboriginal sites in the EMBA (see Appendix G).

No archaeological sites within the Operational Area or EMBA were identified by Traditional Custodians during the course of preparing the EP (see Table 5-4). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).

Where Indigenous archaeological material is identified within the EMBA, Woodside will discuss the management of this material with appropriate Traditional Custodian group(s), starting with any adjacent Native Title Body Corporate.

4.10.1.7 Ethnographic Heritage Assessment

To supplement understanding of the area, Woodside commissioned an ethnographic survey to support the Scarborough Project (McDonald and Phillips 2021), including the Operational Area (See Figure 4-14). An ethnographic survey determines both the tangible and intangible cultural heritage which may be associated with a particular story, person/peoples, animals, plants, area, features or objects. Typical results from surveys of this nature may include the identification of songlines, ceremonial places such as 'thalu' sites for managing environmental resources, or places where activities such as birthing, initiation or other significant activities are performed.

The survey was conducted by MAC as representatives of Traditional Custodians for the onshore and nearshore aspects of the Scarborough Project. MAC appointed their preferred heritage consultants to meet on Country with the MAC Circle of Elders to discuss the project and identify any cultural values (McDonald and Phillips 2021). The resulting report is owned by MAC and was approved by the Circle of Elders prior to being provided to Woodside. Representatives from the Mardudhunera, Ngarluma, Yaburara, Yindjibarndi and Wong-Goo-Tt-Oo Peoples—all five Indigenous groups represented by MAC (MAC 2022)—participated in this survey (McDonald and Phillips 2021). This scope of the assessment was informed by the Scarborough project's development footprint as provided in Figure 4-15, however a landscape-scale approach was undertaken, considering heritage values that may be identified by participants well beyond this footprint. No boundary was imposed on the participants, and participants were not restricted in the types of heritage value they were encouraged to identify. Participants were shown an introductory video explaining the key parameters of the Scarborough project including the proposed pipeline (McDonald and Phillips 2021). The survey purpose as outlined in the survey scope of work included providing understanding of the cultural values within the coastal, nearshore and offshore proposed Scarborough trunkline and associated works areas. These associated works areas included the Borrow Ground as well as other state-water project areas. The survey identified ethnographic sites onshore, but these are outside the Operational Area and EMBA and scope of this EP (McDonald and Phillips 2021). It was noted that some traditional knowledge of ethnographic values may have been lost through the effects of colonisation generally, and as a result of the Flying Foam Massacre in particular (McDonald and Phillips 2021).

The survey found no ethnographic sites or values within the EMBA. The survey identified ethnographic sites onshore, but these are outside the EMBA and scope of this EP (McDonald and Phillips 2021). It is not appropriate or practical to request Traditional Custodians to list all ethnographic values onshore which they have not identified as potentially impacted, however some identified in the report included stories related to Eaglehawk Island and several sites at Withnell Bay several kilometres from the project footprint, outside of the EMBA and exclusively onshore. Some of these sites have spiritual connections throughout the landscape including to Cape Preston and

Depuch Island. It was not proposed in the report that the Project would pose any risk to these sites or values, which are located well outside the Project footprint.

McDonald and Phillips (2021) represents the findings of Phase I of a planned two-part ethnographic survey, and recommends that the Phase II ethnographic survey be initiated. The second phase goes beyond industry standard by engaging with neighbouring Aboriginal groups to identify potential ethnographic values that traverse traditional group boundaries. Per Table 5-4, Woodside has communicated its' commitment to the Phase II survey to MAC on multiple occasions, is ready to progress these at MAC's earliest availability, and believes it has taken all reasonable steps to progress the Phase II survey. The ethnographic survey was run by MAC, and the scope of this survey required "Full recording and significance assessment. The consultant is to provide advice as to whether there are cultural values within and nearby the footprint area..." Discussion with MAC's CEO has confirmed that MAC do not consider that they have failed to deliver on this scope. The survey was conducted with members of MAC's Circle of Elders, who are recognised as cultural authorities for Murujuga, and the final report was approved by the Circle of Elders prior to being provided to Woodside.

Therefore, Woodside understands the Phase I works to adequately describe and assess the cultural, spiritual, aesthetic and social values held by Traditional Custodians for the project area and surrounding land- and seascape. Woodside does not consider the Phase II works to be necessary to the construction of the Scarborough Project.

Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received (including any relevant new information on cultural values from the Phase II survey or other sources), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).



Figure 4-14: Scarborough Development Location considered in the 2020 ethnographic survey (McDonald and Phillips 2021)

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4.10.1.8 Historic Sites of Significance

There are no known sites of historic heritage of significance within the Operational Area. **Appendix H** describes heritage sites within the EMBA.

4.10.1.9 Historic Underwater Heritage

A search of the Australasian Underwater Cultural Heritage Database, which records all known Maritime Cultural Heritage (shipwrecks, aircraft, relics and other underwater cultural heritage) in Australian waters does not contain records of sites within the Operational Area, but does include nine sites within the EMBA. The closest Underwater Cultural Heritage site is the wreck of the *Wild Wave*, a Chinese sailing vessel sunk off the Montebello Islands, approximately 150 km east of the Operational Area.

4.10.1.10 World, National and Commonwealth Heritage Listed Places

No listed World, National and Commonwealth heritage places overlap the Operational Area or EMBA.

4.10.2 Commercial Fisheries

A number of Commonwealth and State fishery management areas are located within the Operational Area and EMBA. The Annual Fishery Status Reports published by the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) were used to identify if Commonwealth managed fisheries that have fished within the Operational Area in the last 5 years. FishCube data were also requested from the WA Department of Primary Industries and Regional Development (DPIRD) for the most recently available 5-year period of fishery catch and effort data (2018-2022) to analyse the potential for interaction with State managed fisheries within the Operational Area (DPIRD, 2022). Data from Fishcube and ABARES was reviewed from the last 5 years as a subset of past fishing effort. This was deemed an appropriate period to represent potential future fishing effort over the lifecycle of this EP (1 year). In addition, any impacts to fish are expected to be temporary in nature (See Section 6.1 and Section 6.2) and therefore not extending beyond the life of the EP. This information was used to determine relevant fisheries for consultation who may be impacted by proposed petroleum activities. **Table 4-19** provides an assessment of the potential interaction and provides further detail on the fisheries that have been identified through desk-based assessment and consultation (**Section 5**).

Table 4-19: Commonwealth and State Managed Commercial Fisheries Management Areas overlapping the Operational Area and EMBA

Fishery	Potential for interaction		
	Operational Area	EMBA	Description
Commonwealth Managed Fisheries			
North West Slope Trawl Fishery	*	✓	The North West Slope Trawl Fishery management area overlaps the EMBA. Between one to six vessels have been active in the fishery since 2005. Fishery Status Reports indicate most recent activity inside the EMBA occurred in the 2020-2021 season (Patterson et al., 2021). Fishery Status Reports indicate there has been no activity inside the Operational Area in the last 5 years. Accordingly, Woodside considers it a possibility that interactions with the fishery may occur in the EMBA.

Fishery	Potential for interaction × no potential for interaction ✓ potential for interaction		
	Operational Area	EMBA	Description
Western Deepwater Trawl Fishery	×	✓	The Western Deepwater Trawl Fishery overlaps the Operational Area and the EMBA. Fishery Status Reports indicate most recent activity overlapping the EMBA occurred in the 2020-2021 season (Patterson et al., 2021). Fishery Status Reports indicate most recent activity overlapping the Operational Area occurred in the 2016 – 2017 season (Patterson et al. 2017). Accordingly, Woodside considers it a possibility that interactions with the fishery may occur in the EMBA.
Western Tuna and Billfish Fishery	×	×	The Western Tuna and Billfish Fishery spans the Australian Fishing Zone west of Victoria and the Torres Strait. However, in the last five years (2016 – 2021), fishing effort has concentrated south of Carnarvon (Patterson et al., 2021). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program.
Southern Bluefin Tuna Fishery	×	×	The Southern Bluefin Tuna Fishery spans the Australian Fishing Zone, however since 1992, the majority of Australian catch has concentrated in south-eastern Australia. (Patterson et al., 2022). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program.
Western Skipjack Tuna Fishery	×	×	The Western Skipjack Tuna Fishery spans the Australian Fishing Zone west of Victoria and the Torres Strait. The Fishery is not currently active and no fishing has occurred since 2009 (Patterson et al., 2022). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program.
State Managed Fisheries			
Pilbara Line Fishery	×	✓	The Pilbara Line Fishery licensees are permitted to operate anywhere within Pilbara waters (Newman et al., 2021), overlapping the Operational Area and EMBA. The fishery is active in the EMBA, with one 60 NM Catch and Effort System (CAES) block reporting up to four licences across the 2017 – 2022 seasons (DPIRD, 2022). FishCube data is not available at the 10 NM CAEs block scale for this fishery (DPIRD, 2022). Accordingly, Woodside considers it a possibility that interactions with the fishery may occur within the EMBA.
Marine Aquarium Fish Managed Fishery	×	✓	The Marine Aquarium Fish Managed Fishery management area overlaps the Operational Area and EMBA, however generally collects fish for display in water depths of less than 30 m. The fishery is active in the EMBA, with one 60 NM CAES block reporting less than three licences across the 2017 – 2021 seasons (DPIRD, 2022). FishCube data reported no active fisheries at 10 NM CAES block overlapping the Operational Area (DPIRD, 2022). Woodside considers it a possibility that interactions with the fishery and the Petroleum Activities Program may occur in the EMBA.
West Coast Deep Sea Crustacean Managed Fishery	×	✓	The West Coast Deep Sea Crustacean Managed Fishery is permitted to fish in waters deeper than the 150 m isobath, overlapping the Operational Area and EMBA. The fishery is active in the EMBA with two 60NM CAES blocks overlapping the EMBA reported less than 3 vessels in the 2021 – 2022 seasons (DPIRD, 2022). FishCube data reported no fishing effort at 10 NM CAES blocks in the last five years overlapping the Operational Area (DPIRD, 2022). Woodside considers there to be potential for interaction with the fishery in the EMBA.

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Fishery	Potential for interaction × no potential for interaction ✓ potential for interaction		
	Operational Area	EMBA	Description
Mackerel Managed Fishery (Areas 2 and 3)	×	✓	The Mackerel Managed Fishery overlaps the Operational Area and EMBA. FishCube data reported active fishing by up to three vessels in one CAES block between the 2017 – 2022 seasons (DPIRD, 2022). FishCube data reported no fishing effort at 10 NM CAES blocks in the last five years overlapping the Operational Area (DPIRD, 2022). Accordingly, Woodside considers there to be potential for interaction with the fishery in the EMBA.
Pilbara Crab Managed Fishery	×	×	The Pilbara Crab Managed Fishery management area overlaps the Operational Area and EMBA. However, FishCube data reported no fishing effort within the Operational Area or EMBA in the last five years (2017 – 2022) (DPIRD, 2022). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program.
West Coast Rock Lobster Fishery	×	×	The Western Rock Lobster Fishery management area overlaps the EMBA (DPIRD, 2022). However, FishCube data reported no fishing effort within the Operational Area or EMBA in the last five years (2017 – 2022) (DPIRD, 2022). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program (DPIRD, 2022).
South West Coast Salmon Managed Fishery	×	×	The South West Coast Salmon Fishery management area overlaps the Operational Area and EMBA. However, FishCube data reported no fishing effort within the Operational Area or EMBA in the last five years (2017 – 2022) (DPIRD, 2022). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program.
Pearl Oyster Managed Fishery	×	×	The Pearl Oyster Managed Fishery management area overlaps the EMBA (DPIRD, 2022). However, FishCube data reported no fishing effort within the Operational Area or EMBA in the last five years (2017 – 2022) (DPIRD, 2022). Accordingly, Woodside considers there to be no potential for interaction with this fishery and the Petroleum Activities Program (DPIRD, 2022).
Charter based commercial operators			
Tour Operators	×	✓	Fishing Tour Operators are permitted to operate across WA state waters and are required to report monthly logbook records of client fish catches. FishCube data reports consistent fishing effort across three 60 NM CAES blocks that overlap the EMBA (DPIRD, 2022). Fishing effort was reported by up to 17 vessels across the 2017 – 2022 seasons (DPIRD, 2022). FishCube data reported no active tour operators at 10 NM CAES blocks overlapping the Operational Area in the last 5 years (DPIRD, 2022). FishCube data indicate tour operator fishing effort highest around Ningaloo and Murion Islands and at Barrow Island and the Montebello Islands, east of the EMBA. Accordingly, Woodside considers it a possibility that interactions with tour operators will occur within the EMBA.

4.10.3 Traditional Fisheries

There are no traditional, or customary, fisheries within the Operational Area, as these are typically restricted to shallow coastal waters and/or areas with structures such as reefs. However, it is recognised that Barrow Island, Montebello Islands, Exmouth, Ningaloo Reef and the adjacent foreshores have a known history of fishing when areas were occupied (as from historical records). Areas that are covered by registered native title claims are likely to practice Aboriginal fishing techniques at various sections of the WA coastline.

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4.10.4 Tourism and Recreation

Current FishCube data (2018- 2022) indicates that no tour operators use the waters within the Operational Area (DPIRD, 2022). The Operational Area is considered too far offshore for recreational fishing or tourism activities to occur. Additionally, the wider EMBA does not overlap with any recognised tourism or recreational areas, however, it is adjacent to the Montebello Islands (200 km east of the Operational Area), where fishing, surfing, snorkelling and diving activities occur year round.

It is acknowledged that there are growing tourism and recreational sectors in WA. These sectors have expanded in area over the last couple of decades. Potential for growth and further expansion in tourism and recreational activities in the Pilbara and Gascoyne regions is recognised, particularly with the development of regional centres and a workforce associated with the resources sector (Gascoyne Development Commission, 2012).

4.10.5 Oil and Gas

The Operational Area is situated within a region of established oil and gas operations, with additional infrastructure in the broader North West Shelf region.

There are no oil and gas facilities owned or operated by other petroleum titleholders located within 50 km of the Operational Area (**Figure 4-15**). **Appendix H** describes current oil and gas development within the EMBA.

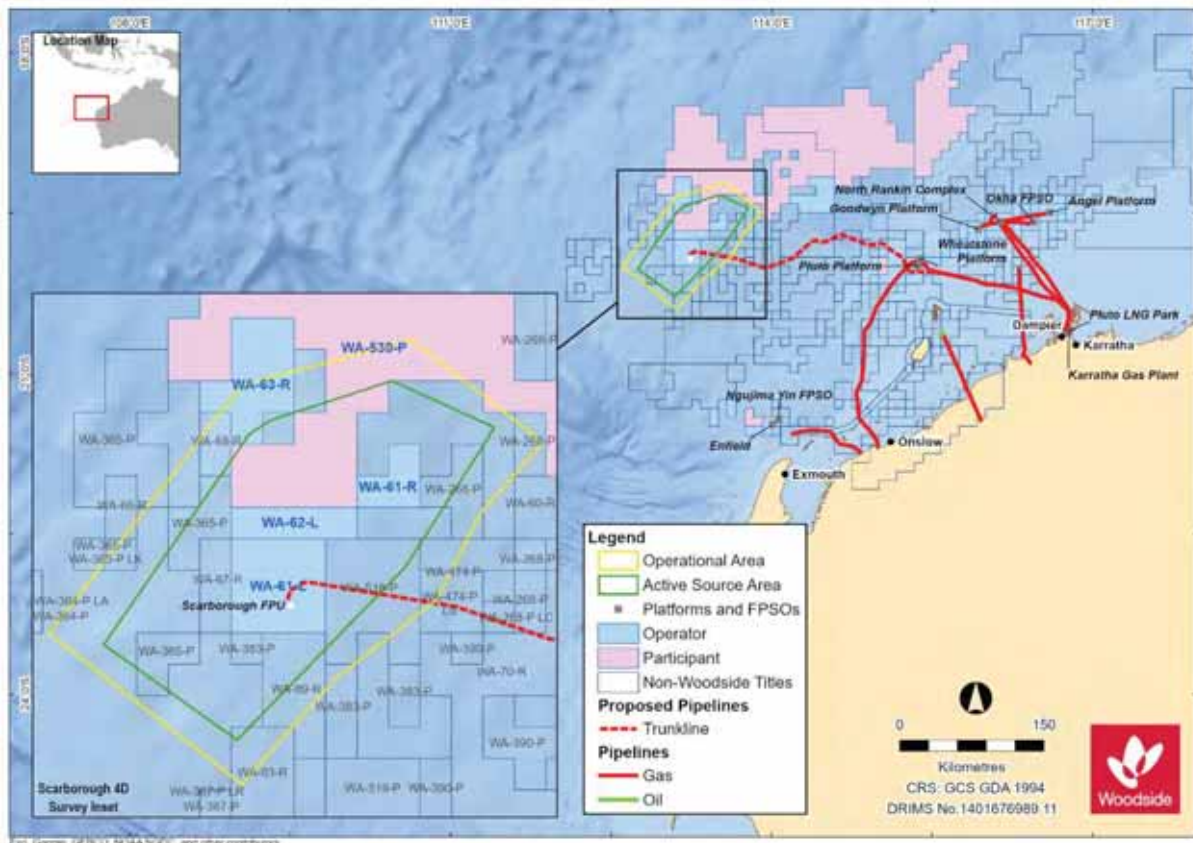


Figure 4-15: Oil and gas Infrastructure in relation to the Operational Area

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4.10.6 Commercial Shipping

The Australian Maritime Safety Authority (AMSA) has introduced a network of shipping fairways across the NWMR off WA to reduce the risk of vessel collisions with offshore infrastructure. It is noted that none of these fairways intersect with the Active Source Area; the nearest fairway intersects the north-east corner of the Operational Area (**Figure 4-16**). Vessel tracking data suggest shipping traffic is concentrated within or close to the fairway in the north-east of the Operational Area and is mostly associated with international vessel movements between Australia and Asia.

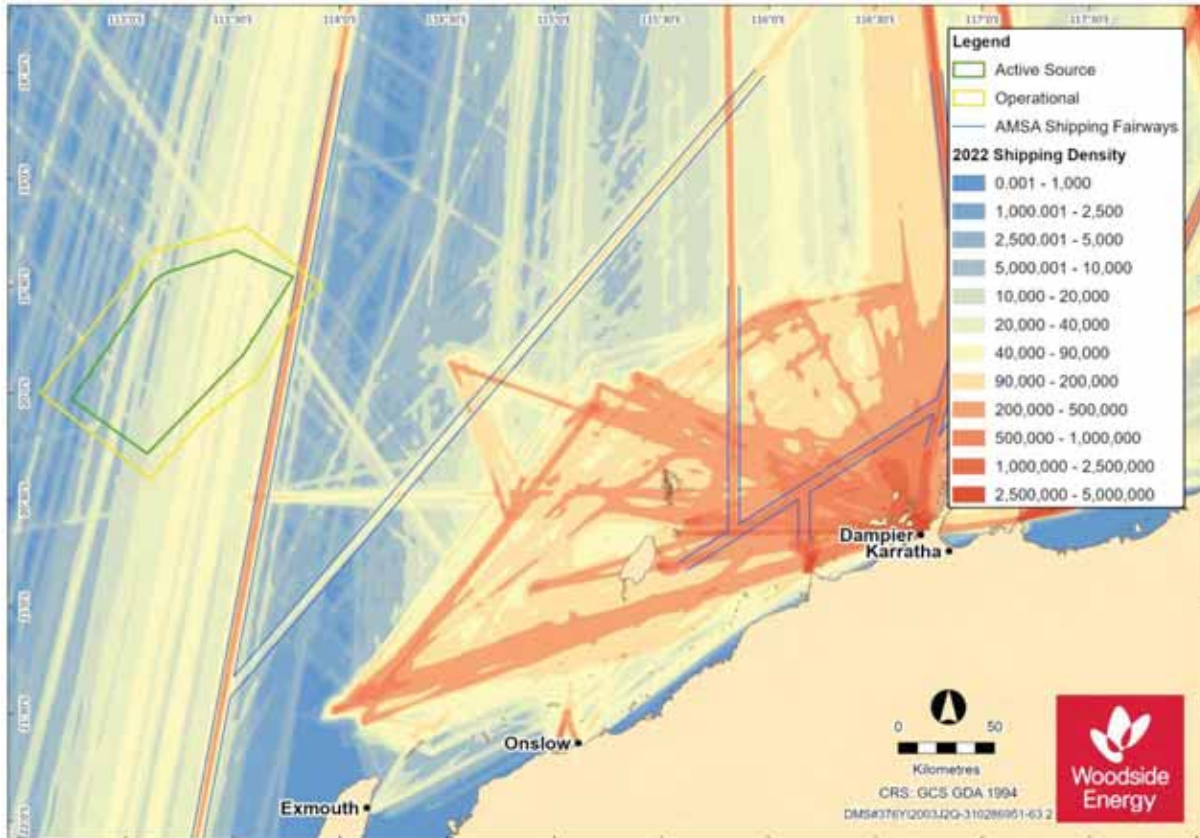


Figure 4-16: Vessel density map for the Operational Area, derived from AMSA satellite tracking system data (vessels include cargo, LNG tanker, passenger vessels, support vessels, and others/unnamed vessels)

4.10.7 Defence

There are designated defence practice and training areas in the offshore marine waters off Ningaloo and the North-west Cape in the EMBA. The Operational Area lies within the northern tip of one of these defence training areas, the North West Exercise Area (NWXA) accessed by Royal Australian Air Force (RAAF) Base Learmonth (**Figure 4-17**). The Learmonth Air Weapons Range (AWR) practice area is located approximately 20 km south of the Operational Area. The closest site where unexploded ordnance is known to occur is 20 km north-west of Bessieres Island, located approximately 190 km from the Operational Area, and outside of the EMBA. Defence areas overlapping the Operational Area are presented in **Figure 4-17**.

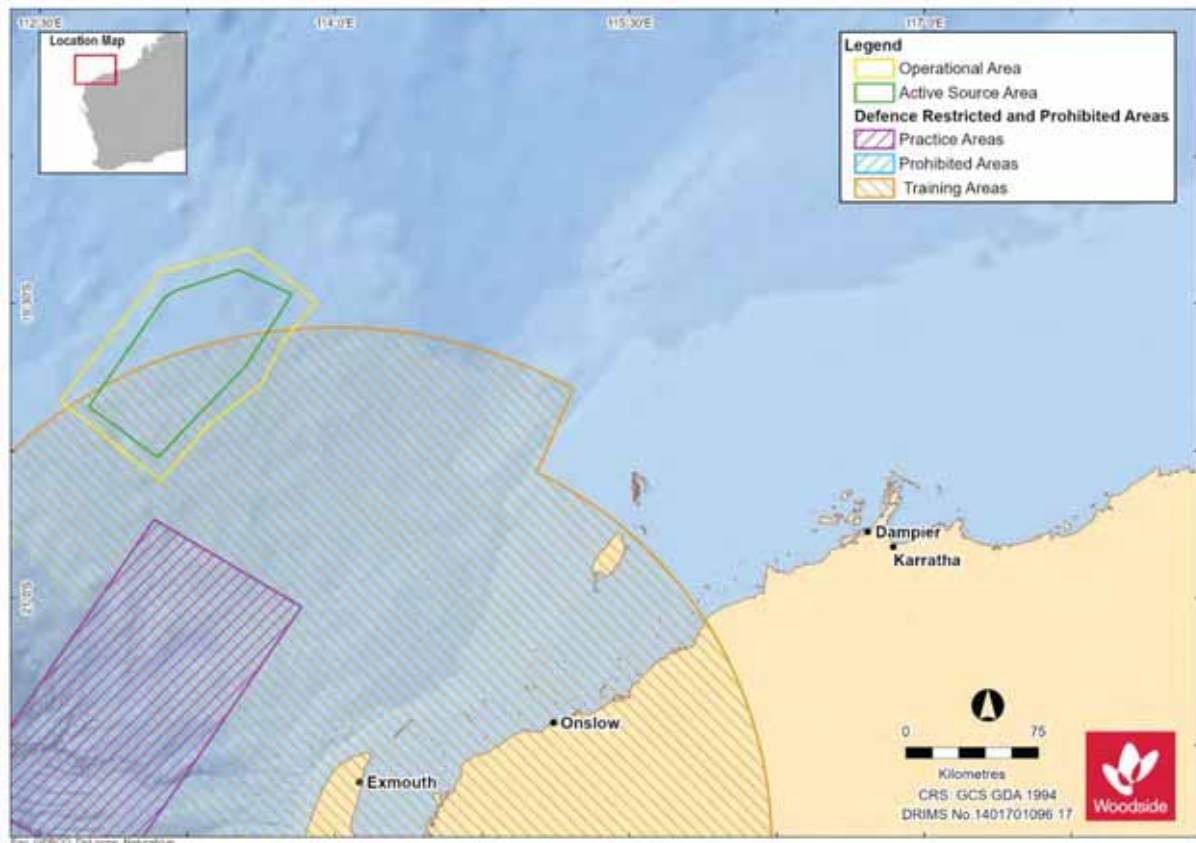


Figure 4-17: Defence areas overlapping and adjacent to the Operational Area

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5 Consultation

5.1 Summary

Woodside consults relevant persons in the course of preparing an EP in accordance with regulation 11A of the Environment Regulations. Woodside acknowledges that consultation is designed to ensure that relevant persons are identified and given sufficient information and a reasonable period to allow them to make an informed assessment of the possible consequences of the proposed activity on them and, to ensure that Titleholders can consider and adopt appropriate measures in response to the matters raised by relevant persons. Consistent with regulation 3 of the Environment Regulations, consultation also supports Woodside's objective to ensure that the environmental impacts and risks of the activity are reduced to ALARP and an acceptable level.

Woodside acknowledges that a titleholder's approach to consultation must be informed by both the Environment Regulations and the findings of the Full Federal Court in the Santos NA Barossa Pty Ltd v Tipakalippa [2022] FCAFC 193 (see **Section 5.2** delivered on 2 December 2022).

For this PAP, Woodside has considered both the Operational Area and the broader EMBA in undertaking consultation (see further discussion in **Section 5.2**). The broadest extent of the EMBA has been determined by reference to the highly unlikely event of a hydrocarbon release resulting from the PAP (see Section 4).

Woodside's consultation methodology is divided into three parts:

- the first section (**Section 5.2 to 5.6**) provides an overview of Woodside's consultation methodology for its EPs, including how we apply regulation 11A(1) of the Environment Regulations to identify relevant persons.
- the second section (**Section 5.7**) explains Woodside's application of the consultation methodology and Woodside's assessment of relevant persons for this EP.
- the third section (**Section 5.8**) details the:
 - opportunities provided to persons or organisations to be aware of Woodside's proposed EP and participate in consultation, including individual Traditional Custodians.
 - consultation information provided to relevant persons, feedback received and Woodside's assessment of the merits of objections or claims.
 - engagement with persons or organisations that Woodside chose to contact who are not relevant persons for the purposes of regulation 11A(1) of the Environment Regulations (see **Section 5.3.4**).

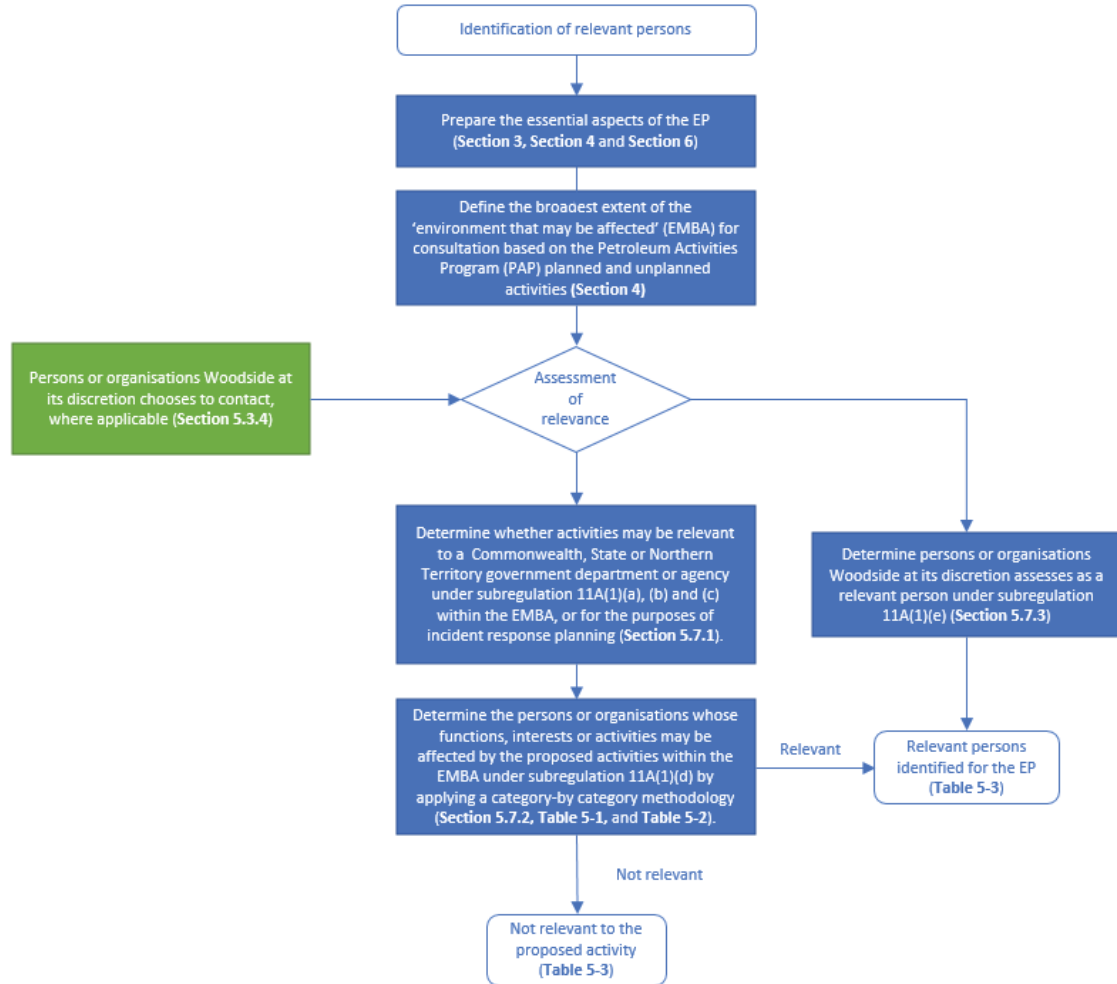


Figure 5-1: Overview of Woodside’s methodology to identify relevant persons

5.2 Consultation – General Context

Woodside has a portfolio of quality oil and gas assets and more than 30 years of operating experience. We have a strong history of working with local communities, the relevant regulators and a broad range of persons and organisations to understand the potential risks and impacts from our proposed activities and to develop appropriate measures to manage them.

The length of time that we have operated in Commonwealth and State waters, and the history of continued engagement with a wide range of persons and organisations enables Woodside to develop an extensive consultation list to inform its consultation process. This consultation list is not used as a definitive list of persons to consult, but rather, assists Woodside as an input to its understanding of relevant persons with whom to consult on a proposed petroleum activity. The information in the consultation list has been captured from years of experience, it contains insights relating to the type of information particular persons or organisations want to receive during consultation, the appropriate method of consultation for relevant persons and includes appropriate contact details, which are periodically reviewed and updated.

Woodside acknowledges NOPSEMA’s Guideline on Consultation in the course of preparing an environment plan (12 May 2023) as well as recent judicial guidance (in the Full Federal Court’s decision in Santos NA Barossa Pty Ltd v Tipakalippa [2022] FCAFC 193) on the intent of consultation as follows:

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- At paragraph 54 of the appeal decision: ... provide a basis for NOPSEMA's considerations of the measures, if any, that a titleholder proposes to take or has taken to lessen or avoid the deleterious effect of its proposed activity on the environment, as expansively defined.
- At paragraph 89 of the appeal decision: ... its purpose is to ensure that the titleholder has ascertained, understood and addressed all the environmental impacts and risks that might arise from its proposed activity. Consultation facilitates this outcome because it gives the titleholder an opportunity to receive information that it might not otherwise have received from others affected by its proposed activity. Consultation enables the titleholder to better understand how others with an objective stake in the environment in which it proposes to pursue the activity perceive those environmental impacts and risks. As the Regulations expressly contemplate, it enables the titleholder to refine or change the measures it proposes to address those impacts and risks by taking into account the information acquired through the consultations. Objectively, the scheme intends that this is likely to improve the minimisation of environmental impacts and risks from the activity.

In order to undertake consultation, Woodside has developed a methodology for identifying relevant persons, in accordance with regulation 11A(1) of the Environment Regulations. This methodology reflects NOPSEMA's recent guideline and demonstrates that, in order to meet the requirements of regulation 10A (criteria for EP acceptance) when preparing the EP, Woodside understands:

- our planned activities in the Operational Area, being the area in which our planned activities are proposed to occur (see **Section 3.3.2**); and
- the geographical extent to which the environment may be affected (EMBA) by risks and impacts from our activities (unplanned) (identified in **Section 4.1** and assessed in **Section 6.8**).

Woodside has undertaken consultation in the course of preparing this EP in compliance with regulation 11A of the Environment Regulations, which requires a titleholder to:

- consult with each of the following (a relevant person) in the course of preparing an environment plan:
 - each Department or agency of the Commonwealth to which the activities to be carried out under the environment plan, or the revision of the environment plan, may be relevant.
 - each Department or agency of a State or the Northern Territory to which the activities to be carried out under the EP, or the revision of the EP, may be relevant;
 - the Department of the responsible State Minister, or the responsible Northern Territory Minister;
 - a person or organisation whose functions, interests or activities may be affected by the activities to be carried out under the EP, or the revision of the EP; and
 - any other person or organisation that the titleholder considers relevant (regulation 11A(1)).
- give each relevant person sufficient information to allow the relevant person to make an informed assessment of the possible consequences of the activity on the their functions, interests or activities (regulation 11A(1)(2));
- allow a relevant person a reasonable period for the consultation (regulation 11A(1)(3)); and
- tell each relevant person that the titleholder consults with that the relevant person may request that particular information it provides in the consultation not be published and any information subject to such a request is not to be published (regulation 11A(1)(4)).

Further, Woodside seeks to carry out consultation in a manner that:

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- is consistent with the principles of ecologically sustainable development (ESD) set out in section 3A of the EPBC Act – see **Section 2**.
- is intended to reduce the environmental impacts and risks from the activity to ALARP and an acceptable level;
- seeks to ensure that the environmental impacts and risks of the activity will be of an acceptable level;
- is intended to minimise harm to the relevant person and the environment from the proposed petroleum activities and to enable Woodside to consider measures that may be taken to mitigate the potential adverse environmental impacts that the petroleum activity may otherwise cause;
- is collaborative; Woodside respects that for a relevant person, consultation is voluntary. Where the relevant person seeks to engage, Woodside collaborates with the relevant person with the aim of seeking genuine and meaningful two-way dialogue; and
- provides opportunities for relevant persons to provide feedback throughout the life of the EP through its ongoing consultation process (refer to **Section 5.6** and **Section 7.9.2.1**).

An overview of Woodside’s consultation approach is outlined at **Figure 5-2**.

The methodology for consultation for this activity has been informed by various guidelines and relevant information for consultation on planned activities, including:

Federal Court:

- [Santos NA Barossa Pty Ltd v Tipakalippa \[2022\] FCAFC 193](#)

NOPSEMA:

- [GL2086 – Consultation in the course of preparing an environment plan – May 2023](#)
- [GN1847 - Responding to public comment on environment plans - July 2022](#)
- [GN1344 - Environment plan content requirements - September 2020](#)
- [GL1721 - Environment Plan Decision Making Guideline - December 2022](#)
- [GN1488 - Oil pollution risk management - July 2021](#)
- [GN1785 – Petroleum activities and Australian Marine Parks – June 2020](#)
- [GL1887 – Consultation with Commonwealth agencies with responsibilities in the marine area – January 2023](#)
- [PL2098 – Draft Policy for managing gender-restricted information](#)
- [Consultation on offshore petroleum environment plans – Information for the community](#)

Department of Climate Change, Energy, the Environment and Water:

- [Sea Countries of the North-West; Literature review on Indigenous connection to and uses of the North West Marine Region](#)

Australian Fisheries Management Authority:

- [Petroleum industry consultation with the commercial fishing industry](#)

Commonwealth Department of Agriculture and Water Resources:

- [Fisheries and the Environment – Offshore Petroleum and Greenhouse Gas Act 2006](#)
- [Offshore Installations Biosecurity Guide](#)

WA Department of Primary Industries and Regional Development:

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- [Guidance statement for oil and gas industry consultation with the Department of Fisheries](#)

WA Department of Transport:

- [Offshore Petroleum Industry Guidance Note](#)

Good practice consultation:

- [IAP2 Public Participation Spectrum](#)
- [Interim Engaging with First Nations People and Communities on Assessments and Approvals under the Environment Protection and Biodiversity Act 1999](#)

5.3 Identification of Relevant Persons for Consultation

5.3.1 Regulations 11A(1)(a), (b) and (c)

The relevant inquiry for determining relevant persons within the description of regulations 11A(1)(a) and (b) is whether the activities to be carried out under the EP may be relevant to one of the government departments or agencies in those regulations. These government departments and agencies are listed in Table 5-3. In accordance with regulation 11A(1)(c), Woodside consults with the department of the relevant State Minister, which for this EP is the Department of Mines, Industry Regulation and Safety (DMIRS).

5.3.2 Regulation 11A(1)(d)

In order to identify a relevant person for the purposes of regulation 11A(1)(d), the meaning of “functions, interests or activities” needs to be understood. In regulation 11A(1)(d), the phrase “functions, interests or activities” should be construed broadly and consistently with the objects of the Environment Regulations (regulation 3) and the objects of the EPBC Act (section 3A).

In developing its methodology for consultation, Woodside acknowledges that the guidance on the definition of functions, interests and activities is as follows in accordance with NOPSEMA’s *GL2086 – Consultation in the course of preparing an environment plan* guideline (May 2023):

Functions	Refers to a power or duty to do something.
Interests	Conforms to the accepted concept of ‘interest’ in other areas of public administrative law and includes any interest possessed by an individual whether or not the interest amounts to a legal right or is a proprietary or financial interest or relates to reputation.
Activities	Broader than the definition of ‘activity’ in Regulation 4 of the Environment Regulations and is likely be directed to what the relevant person is already doing.

As discussed in **Section 5.1** and **Section 5.2**, Woodside’s methodology for determining ‘relevant persons’ for the purpose of regulation 11A(1)(d) of the Environment Regulations includes consideration of:

- whether a person or organisation has functions interests or activities that overlap with the Operational Area and EMBA; and
- whether a person or organisation’s functions, interests or activities may be affected by Woodside’s proposed planned or unplanned activities.

5.3.3 Regulation 11A(1)(e)

In addition to assessing relevance under regulation 11 A(1)(d), Woodside has discretion to categorise any other person or organisation as a relevant person under regulation 11A(1)(e).

5.3.4 Persons or organisations Woodside chooses to contact

In addition to undertaking consultation with relevant persons under regulation 11A(1) there are persons or organisations that Woodside chooses to contact, from time to time, in relation to a proposed activity. For example, these are persons or organisations:

- that are 'not relevant' pursuant to regulation 11A(1) but that Woodside has chosen to seek additional guidance from, for example, to inform the correct contact person that Woodside should consult, or engage with;
- that are 'not relevant' pursuant to regulation 11A(1) but have been contacted as a result of consultation requirements changing or updated guidance from the Regulator; and
- where it is unclear what their functions, interests or activities are, or whether their functions, interests or activities may be affected. In this circumstance, engagement is required to inform relevance under Woodside's methodology. Woodside follows the same methodology for assessing a person or organisations relevance as it does during its initial assessment (as described in **Figure 5-1** and **Section 5.7**. The result of Woodside's assessment of relevance during the development of the EP is outlined at **Table 5-3**.

5.4 Consultation Material and Timing

Regulation 11A(2) provides that a titleholder must give each relevant person sufficient information to allow the relevant person to make an informed assessment of the possible consequences of the activity on the functions, interests or activities of the relevant person. Regulation 11A(3) provides that the titleholder must allow a relevant person a reasonable period for the consultation.

As set out in **Section 5.2**, Woodside notifies relevant persons, of the proposed activities, respecting that consultation is voluntary (for the relevant person) and collaborates on a consultation approach where further engagement is sought by the relevant person. Woodside understands that the consultation process should be appropriate for the category of relevant persons and that not all persons or organisations will require the same level of engagement. Woodside recognises that the level of engagement is dependent on the nature and scale of the PAP. Woodside recognises published guidance for good practice consultation relevant to different sectors and disciplines (see **Section 5.2**). Woodside's methodology for providing relevant persons with sufficient information as well as a reasonable period of time to provide feedback is set out in this section.

5.4.1 Sufficient information

Woodside produces a Consultation Information Sheet for each EP (Appendix F, reference 1.1). This is provided to relevant persons and organisations and is also available on Woodside's website for interested parties to access and to provide feedback on. The Consultation Information Sheet typically includes a description of the proposed petroleum activity, the Operational Area where the activity will take place, the timing and duration of the activity, a location map of the Operational Area and EMBA, a description of the EMBA, relevant exclusion zones as well as a summary of relevant risks and mitigation and/or management control measures relevant to the proposed petroleum activity. It also sets out contact details to provide feedback to Woodside.

Woodside recognises that the level of information necessary to assist a person or organisation to understand the impacts of the proposed activity on their functions, interests or activities may vary and, also may depend on the degree to which a relevant person is affected. For example, Woodside considers that relevant persons who may be impacted by planned activities in the Operational Area, for example as a result of temporary displacement due to exclusion zones, may require more

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targeted information relevant to their functions, interests or activities. Woodside also acknowledges NOPSEMA's brochure entitled Consultation on offshore petroleum environment plans information for the community, which advises consultees that they may inform titleholders that they only want to be consulted in the very unlikely event of an oil spill.

As described in **Section 5.3.4**, Woodside places advertisements in a selected local, state and national newspaper. This typically includes the name of the EP Woodside is seeking feedback on, an overview of the activity, the consultation feedback date and the ways in which a person or organisation can provide feedback. Advertising in the local paper in the area of the activity is also consistent with the public notification process under section 66 of the Native Title Act for native title applications. Woodside typically aligns advertisement feedback timeframes with the timing described below. Feedback received is assessed in accordance with **Section 5.7** to determine relevance and evidenced in **Table 5-4** as appropriate.

Woodside utilises a range of tools to provide sufficient materials to relevant persons, which may include one or more of the following:

- Consultation Information Sheet available on Woodside's website (Appendix F, reference 1.1);
- Bespoke Consultation Information Sheet, presentations or summaries specific to a particular relevant person group (Appendix F);
- Subscription available on Woodside's website to receive notification of new Consultation Information Sheets for Woodside EPs;
- Emails;
- Letters;
- Phone calls;
- Face-to-face meetings (virtual or in person) with presentation slides or handouts as appropriate;
- Maps outlining a persons or organisations defined area of responsibility in relation to the proposed activity, for example a fisheries management area or defence training area; and
- Community meetings, as appropriate.

Woodside recognises that information may need to be provided to relevant persons in an iterative manner during the consultation process. Woodside considers that in line with the intent of consultation (see **Section 5.2**), the threshold for genuine two-way engagement is met via feedback on incorporation of controls, where applicable, being provided to the relevant person to ensure the relevant persons understands how their input has been considered in the development of the EP.

Information which is provided to relevant persons for the purposes of consultation on this EP is summarised at **Table 5-4**.

Table 5-5 sets out the information which is provided to persons or organisations that are not relevant for the purposes of regulation 11A but which Woodside has chosen to contact (see **Section 5.3.4**).

When engaging in consultation, Woodside notifies relevant persons that, in accordance with regulation 11A(4), the relevant person may request that particular information the person or organisation provides in the consultation not be published and that information subject to that request will not be published.

5.4.2 Sufficient time

Woodside seeks feedback in order to support preparation of its environment plan. Woodside recognises that what constitutes a reasonable period for consultation should be considered on a

case-by-case basis, with reference to the nature, scale and complexity of the activity. Woodside's typical approach is as follows:

- advertising in selected local, state and national newspapers (see Appendix F, reference X) to give persons or organisations the opportunity to understand the activity and identify whether their functions, interests or activities may be affected;
- providing consultation materials directly to identified relevant persons as well as persons who are not relevant but Woodside chose to contact (see **Section 5.3.4**), and providing a target date for feedback. Woodside acknowledges that feedback may be received from relevant persons following the target date;
- acknowledging that the way in which Woodside provides consultation information may vary depending on the relevant person or organisation and, may depend on the degree to which a relevant person or organisation is affected. Different consultation processes may be required for relevant persons and organisations depending on the information requirements;
- following up with relevant persons prior to EP submission. Where possible, Woodside will endeavour to use an alternative method of communication to contact the relevant person; and
- engaging in two-way dialogue with relevant persons or organisations where feedback is received.

The specific consultation materials and engagements for this EP are set out in **Section 5.8.1, Table 5-4** and **Table 5-5**.

Woodside communicates with relevant persons in different ways. Woodside recognises that as part of genuine two-way dialogue, these forms of communication may evolve, including for example due to changes to organisation representation, as relationships are further established, or an alternative form of communication is expressed by a person or organisation. Woodside acknowledges that there might be limitations in how it can consult with relevant persons.

Typical forms of communications for categories of relevant persons are set out below.

Category of relevant person	Typically accepted form of communication
Government departments / agencies – marine	Woodside applies NOPSEMA's guideline for engagement with Commonwealth government departments or agencies in line with <i>GL1887 – Consultation with Commonwealth agencies with responsibilities in the marine area – January 2023</i> by using email for its consultation unless another form of communication is requested.
Government departments / agencies – environment	
Government departments / agencies – industry	Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.
Commercial fisheries and peak representative bodies	<p>Commonwealth commercial fisheries: The Australian Fisheries Management Agency (AFMA) has responsibility for providing licence holder contact details which are limited to email addresses. Alternative forms of communication are at the licence holder's discretion. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.</p> <p>State commercial fisheries and recreational marine users: The Western Australian Department of Primary Industries and Regional Development (DPIRD) has responsibility for managing the <i>Fish Resources Management Act 1994</i> and <i>Aquatic Resources Management Act 2016</i>, which limits the provision of contact details from the register to the name and business address of licence holders. Alternative forms of communication are at the licence holder's discretion. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.</p> <p>Peak representative bodies: Email is used as the primary form of communication with commercial fishery and recreational marine user peak representative bodies in the ordinary course of business. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.</p>
Recreational marine users and peak representative bodies	

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Category of relevant person	Typically accepted form of communication
Titleholders and Operators	Email is used as the primary form of communication between titleholders and operators in the ordinary course of business. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.
Peak industry representative bodies	Email is used as the primary form of communication with peak representative bodies in the ordinary course of business. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.
Traditional Custodians and nominated representative corporations	There are many forms of communication that Woodside uses on a case-by-case basis and as appropriate to the specific group, such as; email, phone calls, meetings and community forums. Other forms of communication are used on request.
Native Title Representative Bodies	There are many forms of communication that Woodside uses on a case-by-case basis and as appropriate to the specific group, such as; email, phone calls, meetings and community forums. Other forms of communication are used on request.
Historical heritage groups or organisations	NOPSEMA's guideline (<i>GL1887 – Consultation with Commonwealth agencies with responsibilities in the marine area – January 2023</i>) for engagement with government departments or agencies is used as a reference for Woodside's approach for communicating with historical heritage groups or organisations. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.
Local government and recognised local community reference/liaison groups or organisations	Local government: NOPSEMA's guideline (<i>GL1887 – Consultation with Commonwealth agencies with responsibilities in the marine area – January 2023</i>) for engagement with local government is used as a reference for Woodside's approach for communicating with historical heritage groups or organisations. Community reference/liaison groups and chambers of commerce: Email is used as the primary form of communication with local community reference/liaison groups or organisations in the ordinary course of business. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.
Other non-government groups or organisations	Email is used as the primary form of communication with Other non-government groups or organisations. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.
Research Institutes and Local conservation groups or organisations	Email is used as the primary form of communication with research institutes and local conservation groups or organisations. Other forms of communication, such as phone calls, and meetings and/or presentation briefings are used on request.

As detailed in **Section 5.6** and **Section 7.9.2.1**, if comments and feedback are received after the EP has been submitted, Woodside will consider those comments and update controls as appropriate, at all stages during the life of the EP.

5.5 Providing Feedback and Assessment of Merit of Objections or Claims

There are a number of ways in which feedback can be provided. Feedback can be provided through the Woodside feedback email or via the Woodside feedback toll free phone line as outlined in the Consultation Information Sheet and the Woodside website. Where appropriate, consultation may also be supported by phone calls or meetings.

Woodside consults widely on its EPs and notes that feedback is received in various forms. Feedback that is considered inappropriate or that puts the environment, health, safety or wellbeing of Woodside employees or operations at risk will not be tolerated. Woodside respects people's rights to protest peacefully and lawfully but actions that put the environment, health, safety or wellbeing of Woodside employees or operations at risk go beyond those boundaries.

Woodside accepts feedback and engages in consultation in order to achieve the aims set out in **Section 5.2**. Woodside recognises that there are persons and organisations that take a view that

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Woodside's operations and/or growth projects should be stopped or at least delayed as far as possible. Whilst Woodside assesses the merits of objections or claims received, it acknowledges NOPSEMA's guidance in its brochure entitled Consultation on offshore petroleum environment plans information for the community, which states that relevant persons are free to respond on any matter and raise any concern, however this may not be able to be considered if it is outside the scope or purpose of the environment plan and approval process, for example, statements of fundamental objection to offshore petroleum activities or information containing personal threats or profanities.

Feedback from relevant persons is reviewed and an assessment of the merits is made of information provided as well as objections or claims about the adverse impact of each activity to which the EP relates. This might, for instance, be done through a review of data and literature and for relevance to the nature and scale of the activity outlined in the EP. Consistent with the aim of consultation in **Section 5.2**, Woodside will consider information received when reviewing and designing measures to put in place to minimise harm to relevant persons and where reasonable or practical to further manage impacts and risks to ALARP and acceptable levels.

Woodside considers feedback during consultation from relevant persons and other persons Woodside chose to contact (see **Section 5.3.4**). This information is summarised in **Table 5-4** and **Table 5-5** of the EP and includes a statement of Woodside's response, or proposed response, if any, to each objection and claim.

In accordance with regulation 9(8) of the Environment Regulations, sensitive information (if any) in an EP, and the full text of any response by a relevant person to consultation under regulation 11A, must be contained in the sensitive information part of the plan and not anywhere else in the plan.

5.6 Ongoing Consultation

Consultation can continue to occur during the life of an EP, including after an EP has been accepted by NOPSEMA.

As per Woodside's ongoing consultation approach (refer to **Section 7.9.2.1**), feedback and comments received from relevant persons continue to be assessed and responded to, as required, throughout the life of an EP, including during its assessment and once accepted, in accordance with the intended outcome of consultation (as set out in **Section 5.2**).

Should consultation feedback be received following the acceptance of an EP that identifies a measure or control that requires implementation or updates to meet the intended outcome of consultation (see **Section 5.2**), Woodside will apply its Management of Change and Review process as appropriate (see **Section 7.6**).

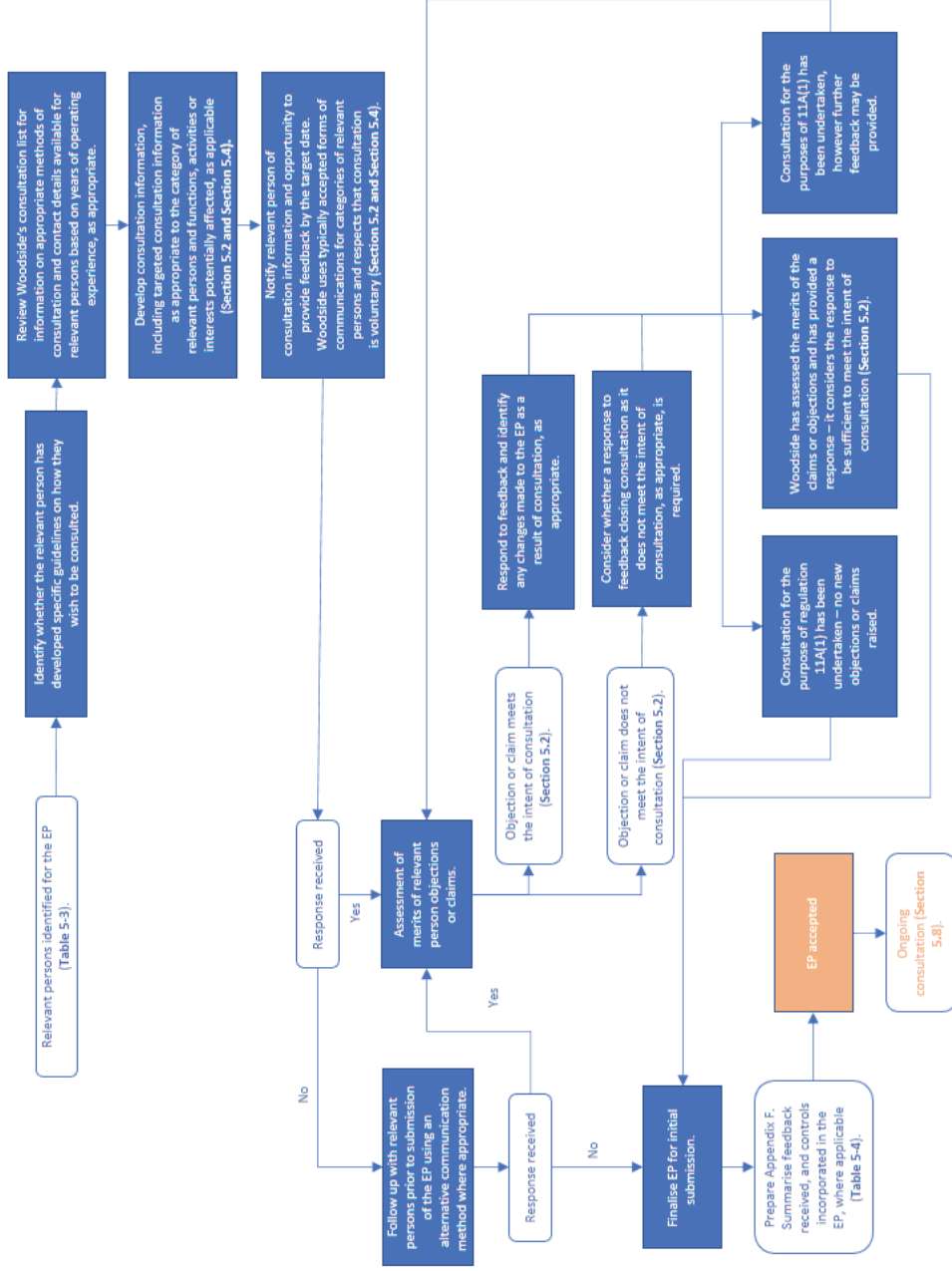


Figure 5-2: Overview of Woodside's consultation approach

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5.7 Identification of Relevant Persons for this EP

5.7.1 Identification of relevant persons under regulation 11A(1)(a), (b) and (c)

Woodside's methodology for identifying relevant persons under regulations 11A(1)(a), (b) and (c) is as follows:

- Woodside considers the defined responsibilities of each of the departments and agencies to which the activities in the EMBA to be carried out under the EP may be relevant. This list of relevant department and agencies is formulated by reference to the responsibilities of the government departments as set out on their websites, in NOPSEMA's GL1887 - Consultation with Commonwealth agencies with responsibilities in the marine area guideline (January 2023), which describes where the Department is a relevant agency under the Environment Regulations, as well as experience and knowledge that Woodside has gained from years of operating in relation to the departments and agencies which Woodside has historically consulted over the years. This list is revised from time to time, for example, for the purposes of to accommodating government restructures, renaming of departments, shifting portfolios and/or to account for new agencies that might arise.
- Woodside has categorised government department or agency groups as follows:

Government departments / agencies – marine	Agencies with legislated responsibilities for use of the marine environment.
Government departments / agencies – environment	Agencies with legislated responsibilities for the protection of the marine environment.
Government departments / agencies – industry	The legislated Department of the responsible Commonwealth, State or Northern Territory Minister for Industry.

- Woodside considers each of the responsibilities of the departments and agencies and determines whether those responsibilities overlap with potential risks and impacts specific to the proposed petroleum activity in the EMBA. The assessment is both activity and location based.
- Woodside acknowledges the roles and responsibilities of government departments and agencies acting on behalf of various industry participants. For example, AMSA - Marine Safety is responsible for the safety of vessels and the seafarers who are operating in the domestic commercial shipping industry and AHO is responsible for maritime safety and Notices to Mariners. To undertake the PAP in a manner that prevents a substantially adverse effect on the potential displacement of marine users, Woodside therefore consults AMSA - Marine Safety and AHO on its proposed activities. Woodside considers each of the responsibilities of the departments and agencies and determines those that would either be involved in the incident response itself or in relation to the regulatory or decision-making capacity with respect to planning for the unlikely event of a worst-case hydrocarbon release incident response specific to the PAP. Feedback received, if any, is assessed in accordance with the intended outcome of consultation (as set out in **Section 5.2**).
- The list of those government departments and agencies assessed as relevant is set out in **Table 5-3**.
- Feedback received, if any, is assessed in accordance with the intended outcome of consultation (as set out in **Section 5.2**) and summarised at **Table 5-4** and **Table 5-5** as appropriate to the relevance assessment.

Woodside does not consult with departments or agencies with interests that do not overlap with risks and impacts specific to the proposed petroleum activity in the EMBA or would not be involved in incident response planning. For instance, in this EP, Woodside has not consulted with the

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department for the Minister of the Northern Territory because there is no overlap given that the proposed activities are in Commonwealth waters offshore of Western Australia.

5.7.2 Identification of relevant persons under regulation 11A(1)(d)

Relevant persons under regulation 11A (1)(d) are defined as a person or organisation whose functions, interests or activities may be affected by the activities to be carried out under the EP, or a revision of the EP. In identifying relevant persons, Woodside considers:

- the planned activities to be carried out under this EP (described in **Section 3**); and
- the EMBA by unplanned activities (identified in **Section 4** and assessed in **Section 6**).

To identify relevant persons who fall within regulation 11A(1)(d), Woodside adopts the following methodology, and then undertakes consultation with relevant persons which is set out further in **Section 5.8**.

- As a general proposition, Woodside assesses whether a person or organisation is a relevant person having regard to:
 - whether a person or organisation has functions interests or activities or that overlap with the Operational Area and EMBA; and
 - whether a person or organisation's functions, interests or activities may be affected by Woodside's proposed planned or unplanned activities.
- This assessment will include applying professional judgement, knowledge and current literature.
- Further, to assist in identifying the full range of relevant persons, Woodside considers the impacts and risks associated with its proposed activities and considers the broad categories of relevant persons who may be affected by the activities. For this EP, the broad categories are identified in **Table 5-1** below and identification methodology applied as set out in **Table 5-2**.
- The list of those persons or organisations assessed as relevant and persons or organisations Woodside chose to contact is set out in **Table 5-3**.
- Feedback received, if any, is assessed in accordance with the intended outcome of consultation (as set out in **Section 5.2**) and applying the categories of relevant persons methodology outlined in **Table 5-2**, as appropriate.
- Feedback from relevant persons is summarised at **Table 5-4**. Feedback from persons assessed as not relevant but whom Woodside chooses to contact is summarised at **Table 5-5**.

Table 5-1: Categories of relevant persons

Category	Explanation
Commercial fisheries and peak representative bodies	Commonwealth or State Commercial Fishery with a fishery management plan recognised under the Commonwealth Fisheries Management Act 1991 (Cth) and Western Australian Fish Resources Management Act 1994 (WA), which may be amended from time to time. Commonwealth peak fishery representative bodies are identified by AFMA. WAFIC is the peak representative body for state fishers in Western Australia.
Recreational marine users and peak representative bodies	Charter boat, tourism and dive operators identified by DPIRD specific to the location of the proposed activity. Representative bodies are the recognised peak organisation(s) for recreational marine users.
Titleholders and Operators	Registered holder of an offshore petroleum title or GHG title governed by the OPGGS Act and associated regulations.
Peak industry representative bodies	Recognised peak organisation(s) for the oil and gas sector.

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Category	Explanation
Traditional Custodians and nominated representative corporations	<p>Traditional Custodians are persons who are descended from Indigenous peoples, who self-identify and are recognised by the Traditional Custodian group.</p> <p>Nominated representative corporations are Traditional Custodians' nominated representative institutions such as Prescribed Body Corporates (PBC).</p> <p>The PBC is the body incorporated by native title holders to hold their native title rights and interests in perpetuity for them and is recognised by the Federal Court in its determination of native title as the appropriate representative body. Thereby the PBC becomes the governing and representative body for the native title group (Traditional Owner society) through which decisions relating to communal interests are made.</p>
Native Title Representative Bodies	A Representative Aboriginal/Torres Strait Islander Bodies (RATSIB) is a regional organisation appointed under the Native Title Act 1993 (NTA) with prescribed functions, set out in Part 11 of the Native Title Act 1993, which relate to: facilitation and assistance; certification; dispute resolution; notifications; agreement making. They are also known, and referred to here, as Native Title Representative Bodies.
Historical heritage groups or organisations	Legislated or government enlisted groups or organisations responsible for the management of marine heritage.
Local government and recognised local community reference/liaison groups or organisations	Local government governed by the Local Government Act 1995 (WA) which is responsible for representing the local community. Recognised local community reference/liaison group or organisation in relation to oil and gas matters.
Other non-government groups or organisations	Non-government organisation with public website material targeting the proposed activity.
Research Institutes and local conservation groups or organisations	<p>Research institutes are government or private institutions that conduct marine or terrestrial research.</p> <p>Local conservation groups are local non-government organisation that regularly conduct conservation activities focused on the local environment or wildlife.</p>

Table 5-2: Methodology for identifying relevant persons within the EMBA undertaken under subcategory 11 A (1) (d) – by category

Category	Relevant person identification methodology
Commercial fisheries (Commonwealth and State) and peak representative bodies	<p>Woodside assesses relevance for commercial fisheries (Commonwealth and State) and their representative bodies using the following next steps in its methodology:</p> <ul style="list-style-type: none"> Defining the parameters having regard to timing, location and duration of the proposed petroleum activity. Confirming whether the EMBA overlaps with the fisheries management area (i.e. the spatial area the fishery is legally permitted to fish in) (see Section 4.1). Woodside acknowledges WAFIC's consultation guidance² (accessed on 2 February 2023), that titleholders develop separate consultation strategies for significant unplanned events (for example oil spill) where titleholders can demonstrate the likelihood of such events occurring is extremely low. WAFIC's guidance is that consultation on unplanned events resulting in an emergency scenario should only be undertaken if an incident occurs (see Appendix I). For Commonwealth and State commercial fisheries, Woodside assesses the potential spatial and temporal extent for interaction with the fishery by reviewing AFMA ABARES and DPIRD Fishcube data within the Operational Area and EMBA (see Section 4.10.2). <p>Assessment of relevance:</p>

² [Consultation Approach for Unplanned Events - WAFIC](#)

Category	Relevant person identification methodology
	<ul style="list-style-type: none"> • State commercial fisheries that have been assessed as having a potential for interaction within the Operational Area or EMBA (see Section 4.10.2) are assessed as relevant to the proposed activity. Woodside acknowledges WAFIC's consultation guidance¹ (see above) and applies this by: <ul style="list-style-type: none"> • directly consulting fishery licence holders that are assessed as having a potential for interaction in the Operational Area; and • consulting fisheries that are assessed as having a potential for interaction in the EMBA via WAFIC. • Commonwealth commercial fisheries that have been assessed as having a potential for interaction within the Operational Area or EMBA (see Section 4.10.2) are assessed as relevant to the proposed activity. • If Woodside has identified that a Commonwealth or State fishery is a relevant person, then Woodside also consults the fisheries relevant representative body. For example, WAFIC represents the interests of State fisheries in Western Australia. If a state fishery is identified as relevant, Woodside would also identify WAFIC as relevant. Recognised Commonwealth fishery representative bodies are identified by AFMA via its website. WAFIC is the only recognised state fishery representative body.
Recreational marine users and peak representative bodies	<p>Woodside assesses relevance for recreational marine users and peak representative bodies using the following next steps in its methodology:</p> <ul style="list-style-type: none"> • From Woodside knowledge and operating experience, knowledge of recreational marine users in the area. This assessment is both activity and location based. • Defining the parameters having regard to timing, location and duration of the proposed petroleum activity. • Assessing the potential spatial and temporal extent for interaction with recreational marine users by reviewing DPIRD Fishcube data to assess whether there has been activity within the EMBA in the past 5 years. <p>Assessment of relevance:</p> <ul style="list-style-type: none"> • Recreational marine users that have been active in the past 5 years within the EMBA are assessed as relevant to the proposed activity. Woodside is provided with the contact details of charter, boat tourism and dive operators specific to the region of the EMBA by DPIRD to consult with the relevant persons. • If Woodside has identified recreational marine users as relevant persons, then Woodside also consults identified peak recreational marine user representative bodies. For example, Recfishwest represents the interests of recreational fishers. These representative bodies are identified via Woodside's existing consultation list, which is updated as appropriate via advice from known groups and DPIRD.
Titleholders and Operators	<p>Woodside assesses relevance for other titleholders and operators using the following next steps in its methodology:</p> <ul style="list-style-type: none"> • Using WA Petroleum Titles (DMIRS-011) to determine overlap with other Titleholders or Operators permit areas within the EMBA. • From Woodside knowledge and operating experience, knowledge of other operators in the area. • Woodside produces a map showing the outcome of this assessment. <p>Assessment of relevance:</p> <ul style="list-style-type: none"> • Titleholders and Operators whose permit areas are identified as having an overlap within the EMBA are assessed as relevant.
Peak industry representative bodies	<p>Woodside assesses relevance for peak industry representative bodies using the following next steps in its methodology:</p> <ul style="list-style-type: none"> • Review of peak industry representative bodies responsibilities that Woodside actively participates in, with consideration of overlap between industry focus area and Woodside's proposed activities within the EMBA. • Review of Woodside's existing consultation list.

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Category	Relevant person identification methodology
	<ul style="list-style-type: none"> • Website search to identify whether any additional peak industry representative bodies have been created whose responsibilities may overlap with Woodside's proposed activities within the EMBA. <p>Assessment of relevance:</p> <ul style="list-style-type: none"> • Peak industry representative bodies whose responsibilities are identified as having an overlap with Woodside's proposed activities within the EMBA are assessed as relevant.
Traditional Custodians and nominated representative corporations	<p>Consistent with its understanding of the matters discussed in Section 4.10.1, Woodside assesses relevance for Traditional Custodians using the following steps in its methodology:</p> <ul style="list-style-type: none"> • In line with the "tri-partite test", Traditional Custodians are persons descended from Indigenous peoples, who self-identify and are recognised by the Traditional Custodian group. The "tripartite test" was described by Justice Brennan in the High Court case of <i>Mabo v Queensland (No. 2)</i> [1992] HCA 23 and has continued to be accepted and applied broadly, most recently by the High Court in a case that <i>Love v Commonwealth of Australia</i> [2020] HCA 3. As Woodside has more than 30 years of operating experience, over the years, it has undertaken extensive engagement with recognised Traditional Custodians for its operations. • Using the database of the National Native Title Tribunal to determine whether there are any Native Title Claims (historical or current) or Determinations overlapping or coastally adjacent to the EMBA. The original Native Title Claims are understood to represent the lands and waters over which Indigenous groups claim or claimed rights (including rights to conduct activities) and interests, and Native Title Determinations are understood to represent the lands and waters over which Indigenous groups have determined rights and interests and their representative institutions have certain functions (see Section 4 and below). • Where there is a positive determination of native title, contacting the PBC. • Where appropriate, contacting the relevant Native Title Representative Body to request a list of any Traditional Custodian groups asserting Traditional Custodianship over an area of coastline adjacent to the EMBA who do not and have never had a native title claim or determination of which the land council or Native Title Representative Body are aware. • Review of relevant Indigenous Land Use Agreements (ILUA), or similar agreements which Woodside has entered into or are publicly available, by which Aboriginal organisations or Traditional Custodian Groups have made a voluntary agreement regarding the use or management of areas of land or water overlapping or coastally adjacent to the EMBA (see Section 4). ILUAs are registered with the Native Title Tribunal and may identify Traditional Custodians or representative bodies to contact regarding potential cultural values. • Review of Commonwealth and State Marine Park Management Plans that overlap the EMBA which may identify Traditional Custodians or representative bodies to contact regarding potential cultural values. • Woodside applies the principles of self-determination when consulting with Traditional Custodians through consulting with representative institutions utilising traditional decision-making mechanisms. • Where the native title group is not clear or there is no representative institution, Woodside may seek guidance from the Native Title Representative Body as to the Traditional Custodian group whose rights and interests may overlap with the EMBA. Woodside may have reference to maps of native title claims and determinations produced by the National Native Title Tribunal, registered Indigenous Land Use Agreements, heritage databases and Indigenous Protected Areas. • Woodside will consult with individual Traditional Custodians where we have been directed to do so by the representative institution or the native title representative body. This may occur when for cultural reasons, and as recognised by the broader group, a person is regarded as having particular obligations in relation to a site or area that are distinct from that of the broader group.

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Category	Relevant person identification methodology
	<ul style="list-style-type: none"> • Woodside provides the opportunity for individual Traditional Custodians to participate in consultation in response to broader notification and advertising, or at community information sessions (see Section 5.8.1). <p>Assessment of relevance:</p> <ul style="list-style-type: none"> • Where there is a positive determination or claim of native title overlapping the EMBA or coastally adjacent to the EMBA, the representative institution will be the PBC (also referred to as the Registered Native Title Body Corporate) for the native title group and assessed as relevant. • Where a relevant Native Title Representative Body provides advice that any Traditional Custodian groups are asserting Traditional Custodianship over an area of coastline adjacent to the EMBA who do not and, have never had a native title claim or determination of which land council or Native Title Representative Body are aware, Woodside will engage with the group to determine relevance. • Where there is an Indigenous Land Use Agreements (ILUA) whereby Aboriginal organisations or Traditional Custodian groups have made a voluntary agreement regarding the use or management of areas of land or water overlapping or coastally adjacent to the EMBA, the PBC for the native title group (where a determination of native title has been made) or the Native Title Representative Body (where a determination has not yet been made) are assessed as relevant. Where there is more than one Traditional Custodian group that is party to an ILUA, the Traditional Custodian group whose native title claim/determination overlaps the EMBA, where applicable, is assessed as relevant. • Where Woodside has entered into an agreement with an Aboriginal organisation or Traditional Custodian group or there is an agreement publicly available regarding the use or management of areas of land or water overlapping or coastally adjacent to the EMBA, Woodside will engage with the organisation or group to determine relevance. • In the WA context, when an Aboriginal Corporation is appointed as a Local Aboriginal Cultural Heritage Service (LACHS) under the Aboriginal Cultural Heritage Act 2021 for an area that overlaps the EMBA, the LACHS will be the representative institution for the group and assessed as relevant. • Where a Traditional Custodian group is referenced as having traditional rights and interests in a marine park management plan overlapping the EMBA, Woodside will consult the organisation or group to determine whether there is any intersect of the organisation or group's functions, interests and activities with risks and impacts from the proposed petroleum activity and assess feedback, if any, to determine relevance. • Where Woodside has been provided guidance from the native title representative body or land council as to the appropriate Traditional Custodian group to be consulted, Woodside will assess feedback from the group or groups, if any, to assess and determine relevance. • Where Woodside receives feedback from a person or organisation that identifies as a Traditional Custodian for an area overlapping the EMBA, including via an advertisement, Woodside will assess the feedback provided including whether the person(s) functions, interests and activities are represented by virtue of their membership of a PBC, and determine relevance. Where it is not clear whether the person(s) is a member of a PBC or native title group that Woodside has determined relevant in line with the above methodology, Woodside will engage the PBC or native title group to determine whether the person(s) membership.
Native Title Representative Bodies	<p>Woodside assesses relevance for Native Title Representative Bodies using the following steps in its methodology:</p> <ul style="list-style-type: none"> • A Representative Aboriginal/Torres Strait Islander Bodies (RATSIB) is a regional organisation appointed under the Native Title Act 1993 (NTA) with prescribed functions set out in Part 11 of the Native Title Act 1993, which relate to: facilitation and assistance; certification; dispute resolution; notifications; agreement making. They are also known, and referred to here, as Native Title Representative Bodies. • Review of National Native Title Tribunal RATSIB areas that overlap or are coastally adjacent to the EMBA. <p>Assessment of relevance:</p>

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Category	Relevant person identification methodology
	<ul style="list-style-type: none"> Where the area for which a Native Title Representative Body is recognised under the Native Title Act 1993, overlaps with the EMBA or is coastally adjacent to the EMBA, Woodside will assess the Native Title Representative Body as relevant.
Historical heritage groups or organisations	<p>Woodside assesses relevance for groups or organisations whose responsibilities are focused on historical heritage using the following next steps in its methodology:</p> <ul style="list-style-type: none"> Using the Australasian Underwater Cultural Heritage Database to assess any known records Maritime Cultural Heritage sites (shipwrecks, aircraft and relics) within the EMBA (see Section 4.10.1). <p>Assessment of relevance:</p> <ul style="list-style-type: none"> Where there is a known underwater heritage site (shipwrecks, aircraft and relics) within the EMBA, the relevant group or organisation that manages the site will be assessed as relevant.
Local government and recognised local community reference/liaison groups or organisations	<p>Woodside assesses relevance for local government and recognised local community reference/liaison groups or organisations using the following next steps in its methodology:</p> <ul style="list-style-type: none"> Review of Woodside maps (developed based on data from the WA Local Government, Sport and Cultural Industries My Council database and WA Local Government Association (WALGA) Local Government Directory maps) to assess any overlap between the local government's defined area of responsibility and the EMBA. Woodside hosts regular community reference/liaison group meetings. Members represent a cross-section of the community and local towns interests. Representatives are from community and industry and generally include, Woodside, State Government (for instance relevant Regional Development Commissions), Local Government, Indigenous Groups, Industry representative bodies, Community and industry organisations. Woodside considers these reference/liaison groups to be the appropriate recognised representatives of the local community for the oil and gas sector. Woodside reviews the community reference/liaison group's terms of reference to determine its area of responsibility and any overlap with the EMBA. For example, the Exmouth Community Liaison Group's area of responsibility in relation to Woodside's operational, development and planning activities, is defined in the terms of reference as the Exmouth sub-basin. Comparatively, the Karratha Community Liaison Group's area of responsibility is the Pilbara region (i.e. onshore). <p>Assessment of relevance:</p> <ul style="list-style-type: none"> The local government whose defined area of responsibility overlaps the EMBA is assessed as relevant. The community reference/liaison group whose defined area of responsibility overlaps the EMBA is assessed as relevant and consulted collectively via the relevant reference/liaison group.
Other non-government groups or organisations	<p>Woodside assesses relevance for other non-government groups or organisations using the following next steps in its methodology:</p> <ul style="list-style-type: none"> Review of Woodside's existing consultation list. Website search of registered non-government groups or organisations (i.e. registered with an Australian Business Number (ABN) and publicly available contact information) that may have public website material specific to the proposed activity at the time of development of the EP. Organisation has a publicly available mission statement (or purpose) that clearly describes their collective functions, interests or activities. Review of current website material to identify targeted information which demonstrates functions, interests or activities relevant to the potential risks and impacts associated with planned activities. <p>Assessment of relevance:</p> <ul style="list-style-type: none"> Registered non-government groups or organisations with current targeted public website material specific to the proposed activity at the time of developing the EP and who have demonstrated functions, interests or activities relevant to the

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Category	Relevant person identification methodology
	<p>potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2) will be assessed as relevant.</p>
<p>Research institutes and local conservation groups or organisations</p>	<p>Woodside assesses relevance for research institutes and local conservation groups or organisations using the following next steps in its methodology:</p> <ul style="list-style-type: none"> • Review of Woodside’s existing consultation list. • Website search for research institutes that may operate within the EMBA. This assessment is both activity and location based. • Website search for local conservation groups or organisations that regularly conduct conservation activities within the EMBA. <p>Assessment of relevance:</p> <ul style="list-style-type: none"> • Where there is known research being undertaken by a research institute within the EMBA, the research institute that is conducting the research will be assessed as relevant. • Local environmental conservation groups who regularly conduct conservation activities or have demonstrated conservation functions, interests or activities within the EMBA are assessed as relevant. This assessment is both activity and location based.

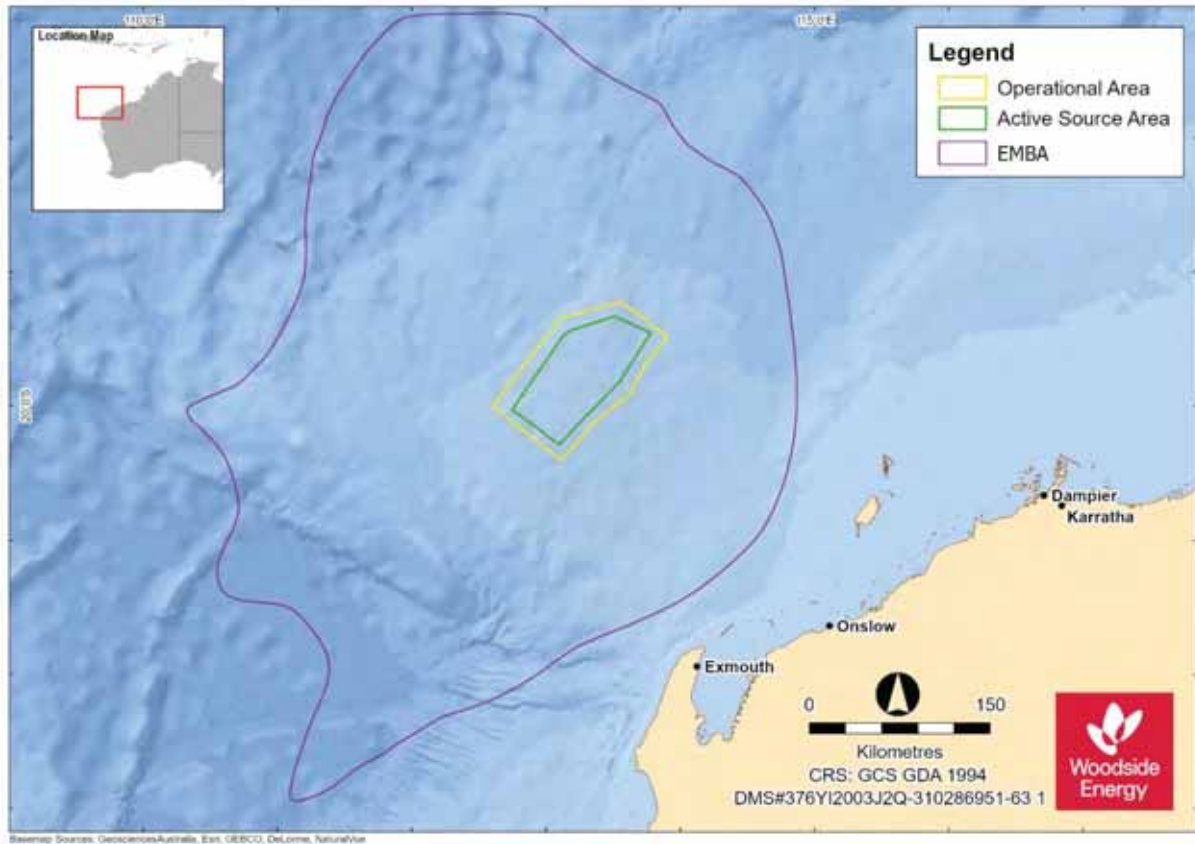


Figure 5-3: Operational Area and EMBA for this EP

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Table 5-3: Assessment of relevance

Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth and WA State Government Departments or Agencies – Marine			
Australian Border Force (ABF)	Responsible for coordinating maritime security	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). ABF's functions may be relevant to the activity as there are proposed vessel activities.	Yes
Australian Fisheries Management Authority (AFMA)	Responsible for managing Commonwealth fisheries	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). The North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA. AFMA's functions may be relevant to the activity as the North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA.	Yes
Australian Hydrographic Office (AHO)	Responsible for maritime safety and Notices to Mariners	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). AHO's functions may be relevant to the activity as there are proposed vessel activities.	Yes
Australian Maritime Safety Authority (AMSA) – Marine Safety	Statutory agency for vessel safety and navigation	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). AMSA – Marine Safety's functions may be relevant to the activity as there are proposed vessel activities.	Yes
Australian Maritime Safety Authority (AMSA) – Marine Pollution	Legislated responsibility for oil pollution response in Commonwealth waters	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). AMSA – Marine Pollution's functions may be relevant to the activity as the proposed activity has a hydrocarbon spill risk which may require AMSA response in Commonwealth waters.	Yes
Department of Agriculture, Fisheries and Forestry (DAFF) – Fisheries (formerly DAWE)	Responsible for implementing Commonwealth policies and programs to support agriculture, fishery, food and forestry industries	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). The North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA. DAFF – Fisheries' (formerly DAWE) functions may be relevant to the activity as the North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Department of Defence (DoD)	Responsible for defending Australia and its national interests.	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). DoD's functions may be relevant to the activity as defence training areas lie within the EMBA.	Yes
Department of Primary Industries and Regional Development (DPIRD)	Responsible for managing State fisheries	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). No State fisheries are active in the Operational Area. The Marine Aquarium Managed Fishery, Mackerel Managed Fishery (Area 2 and 3), West Coast Deep Sea Crustacean Managed Fishery and Pilbara Line Fishery are active in the EMBA. DPIRD's functions may be relevant to the activity as the government department responsible for State fisheries.	Yes
Department of Transport (DoT)	Legislated responsibility for oil pollution response in State waters	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). The proposed activity has a hydrocarbon spill risk, which may require DoT response in State waters.	Yes
Department of Planning, Lands and Heritage (DPLH)	Responsible for state level land use planning and management, and oversight of Aboriginal cultural heritage and built heritage matters.	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). There is no known Maritime Cultural Heritage overlapping the EMBA.	No
Pilbara Ports Authority	Responsible for the operation of the Port of Dampier.	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). The proposed activity does not have the potential to impact Pilbara Ports Authority's functions, interests or activities as the EMBA does not overlap the Pilbara Ports Authority's area of responsibility.	No
Commonwealth and WA State Government Departments or Agencies – Environment			
Department of Agriculture, Fisheries and Forestry (DAFF) – Biosecurity (marine pests, vessels, aircraft and personnel)	DCCEEW administrators, implements and enforces the Biosecurity Act 2015. The Department requests to be consulted where an activity	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a). DAFF – Biosecurity's (formerly DAWE) functions may be relevant to the proposed activities in the EMBA in the prevention of introduced marine species.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
(formerly DAWE)	<p>has the potential to transfer marine pests.</p> <p>DCCEEW also has inspection and reporting requirements to ensure that all conveyances (vessels, installations and aircraft) arriving in Australian territory comply with international health regulations and that any biosecurity risk is managed.</p> <p>The Department requests to be consulted where an activity involves the movement of aircraft or vessels between Australia and offshore petroleum activities either inside or outside Australian territory.</p>		
Department of Climate Change, Energy, the Environment and Water Agriculture (DCCEEW) (formerly DAWE)	<p>Responsible for implementing Commonwealth policies and programs to support climate change, sustainable energy use, water resources, the environment and our heritage.</p> <p>Administers the Underwater Cultural Heritage Act 2018 in collaboration with the States, Northern Territory and Norfolk Island, which is responsible for the protection of shipwrecks, sunken aircraft and other</p>	<p>Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a).</p> <p>DCCEEW's (formerly DAWE) functions may be relevant to the proposed activities in the EMBA as there are potential environmental impacts from the proposed activity.</p> <p>There are known Maritime Cultural Heritage overlapping the EMBA.</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
	types of underwater heritage and their associated artefacts in Commonwealth waters.		
Director of National Parks (DNP)	Responsible for the management of Commonwealth parks and conservation zones.	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a). DNP's functions may be relevant to the activity as DNP requires an awareness of activities that occur within AMPs, and an understanding of potential impacts and risks to the values of parks (NOPSEMA guidance note: N-04750-GN1785 A620236, June 2020). Titleholders are required to consult DNP on offshore petroleum and greenhouse gas exploration activities if they occur in, or may impact on the values of marine parks, including where potential spill response activities may occur in the event of a spill (i.e. scientific monitoring).	Yes
Ningaloo Coast World Heritage Advisory Committee (NCWHAC)	Supports the DBCA to manage the Ningaloo Coast World Heritage Area.	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a). The proposed activity does not have the potential to impact NCWHAC's functions, interests or activities as the EMBA does not overlap the Ningaloo Marine Park.	No
Department of Biodiversity, Conservation and Attractions (DBCA)	Responsible for managing WA's parks, forests and reserves to achieve wildlife conservation and provide sustainable recreation and tourism opportunities.	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(b). The proposed activity EMBA does not overlap WA parks, forests or reserves. Activities have the potential to impact marine tourism in the EMBA.	Yes
Commonwealth and State Government Departments or Agencies – Industry			
Department of Industry, Science and Resources (DISR) (formerly DISER)	Department of relevant Commonwealth Minister.	Required to be consulted under regulation 11A(1)(a).	Yes
Department of Mines, Industry Regulation and Safety (DMIRS)	Department of relevant State Minister	Required to be consulted under regulation 11A(1)(c).	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth Commercial fisheries and representative bodies			
North West Slope and Trawl Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery overlaps the EMBA and has been active in the EMBA within the last 5 years.	Yes
Southern Bluefin Tuna Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the EMBA it has not been active in the EMBA within the last 5 years. Woodside does not consider that the proposed activity will present a risk to licence holders, given since 1992, the majority of Australian catch has concentrated in south-eastern Australia. (Patterson et al., 2022). In addition, given fishing methods by licence holders for species fished in this fishery (Australia has a 35% share of total global allowable catch of Southern Bluefin Tuna, which is value-added through tuna ranching near Port Lincoln (South Australia), or fishing effort in New South Wales (Australian Southern Bluefin Tuna Industry Association).	No
Western Deepwater Trawl Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery overlaps the EMBA and has been active in the EMBA within the last 5 years.	Yes
Western Skipjack Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps Operational Area and EMBA, it has not been active in the EMBA within the last 5 years. Woodside does not consider that the activity will present a risk to licence holders, given the fishery spans the Australian Fishing Zone west of Victoria and the Torres Strait. The Fishery is not currently active and no fishing has occurred since 2009 (Patterson et al., 2022). In addition, interactions are not expected given the species' pelagic distribution fishing methods for species fished by licence holders.	No
Western Tuna and Billfish Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps Operational Area and EMBA, it has not been active in the Operational Area or EMBA within the last 5 years.	No

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Commonwealth Fisheries Association (CFA)	Represents the interests of commercial fishers with licences in Commonwealth waters	Woodside does not consider that the activity will present a risk to licence holders, given fishing methods for species fished by licence holders. Future interactions are not expected given the species' pelagic distribution.	
Australian Southern Bluefin Tuna Industry Association (ASBTIA)	Represents the interests of the Southern Bluefin Tuna Fishery and Western Skipjack Fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA. CFA's functions may be relevant to the activity as the North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA.	Yes
Tuna Australia	Represents the interests of the Western Tuna and Billfish Fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The Southern Bluefin Tuna Fishery has been assessed as not relevant to the proposed activity. As the peak representative body for the Southern Bluefin Tuna Fishery, the ASBTIA has also been assessed as not relevant. Woodside has provided information to the ASBTIA at its discretion in line with Section 5.3.4 on AFMA advice that it expects all Commonwealth fishers who have entitlements to fish within the proposed area to be consulted, which can be through the relevant fishing industry associations.	No
Pearl Producers Association (PPA)	Peak representative organisation of The Australian South Sea Pearling Industry, with members in Western	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The Western Tuna and Billfish Fishery has been assessed as not relevant to the proposed activity. As the peak representative body for the Western Tuna and Billfish Fishery, Tuna Australia has also been assessed as not relevant. Woodside has provided information to Tuna Australia at its discretion in line with Section 5.3.4 on AFMA advice that it expects all Commonwealth fishers who have entitlements to fish within the proposed area to be consulted, which can be through the relevant fishing industry associations.	No
		Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The Pearl Oyster Managed Fishery has been assessed as not relevant to the proposed activity. As the peak representative body for the Pearl Oyster Managed Fishery, the PPA has also been assessed as not relevant.	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
	Australia and the Northern Territory		
State Commercial fisheries and representative bodies			
Marine Aquarium Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area it has not been active in the Operational Area within the last 5 years. The fishery has been active in the EMBA in the last 5 years.	Yes
South West Coast Salmon Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area and EMBA, the fishery has not been active in the Operational Area or EMBA within the last 5 years. Woodside does not consider that the activity will present a risk to licence holders, given fishers are active south of Perth and from the beach (previous WAFIC advice).	No
Mackerel Managed Fishery (Area 2 and 3)	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, it has not been active in the Operational Area within the last 5 years - no fishing occurs due to the water depths and distance from shore. The fishery has been active in the EMBA in the last 5 years.	Yes
Pilbara Crab Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area and EMBA, the fishery has not been active in the Operational Area or EMBA within the last 5 years. The Operational Area overlaps with a closed area of the fishery (as per Schedule 2 of the draft Management Plan [DPIRD, 2018]) and therefore, fishing activity within the Operational Area is currently not permitted.	No
West Coast Deep Sea Crustacean Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, the fishery has not been active in the Operational Area within the last 5 years. Fishing effort is primarily concentrated between Fremantle and Carnarvon. A single 10 nm CAES block (202125) was reportedly fished on the Exmouth Plateau at the southern	Yes

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Pearl Oyster Managed Fishery	State commercial fishery	boundary of the Operational Area sometime between 2003 and 2010 (How et al., 2015, 2017). However, fishing effort has not been reported here since and more recent catch and effort data (2010–2019) confirms no catch or effort within the Operational Area; the closest blocks fished during this period were located about 300 km south (10 nm CAES block 230130) of the Operational Area (DPIRD, 2021). The fishery has been active in the EMBA in the last 5 years.	
Western Australian Sea Cucumber Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area. The fishery overlaps the EMBA but has not been active in the EMBA within the last 5 years. Woodside does not consider that the activity will present a risk to licence holders given fishing methods and location for species fished by licence holders (fishing effort is mostly focussed in shallow coastal waters of 10-15 m depth, with a maximum depth of 35 m) (Lulofs et al. 2002).	No
West Coast Rock Lobster Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, the fishery has not been active in the Operational Area within the last 5 years. Due to water depth, distance offshore, and distance from popular fishing spots, fishers do not collect sea cucumber within the Operational Area. The fishery has not been active in the EMBA within the last 5 years.	No
Demersal Scalefish Fishery: Pilbara Trawl Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area. The fishery overlaps the EMBA but has not been active in the EMBA in the last 5 years.	No
Pilbara Trap Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area or EMBA.	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Pilbara Line Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, it has not been active in the Operational Area within the last 5 years. The fishery has been active in the EMBA in the last 5 years.	Yes
Western Australian Fishing Industry Council (WAFIC)	Represents the interests of commercial fishers with licences in State waters.	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). No State fisheries are active in the Operational Area. The Marine Aquarium Managed Fishery, Mackerel Managed Fishery (Area 2 and 3), West Coast Deep Sea Crustacean Managed Fishery and Pilbara Line Fishery are active in the EMBA. WAFIC's functions may be relevant to the activity as the peak representative body for State fisheries.	Yes
Recreational marine users and representative bodies			
Exmouth recreational marine users	Exmouth-based dive, tourism and charter operators	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact Exmouth-based dive, tourism and charter operator's functions, interests or activities due to the location of activities and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Gascoyne Recreational Marine Users	Gascoyne-based dive, tourism and charter operators	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact Gascoyne-based dive, tourism and charter operator's functions, interests or activities due to the location of activities and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Recfishwest	Represents the interests of recreational fishers in WA.	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact recreational fishers' functions, interests or activities due to the location offshore and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Marine Tourism WA	Represents the interests of marine tourism in WA.	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d).	Yes

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WA Game Fishing Association	Represents the interests of game fishers in WA.	Activities have the potential to impact recreational fishers' functions, interests or activities due to the location offshore and there has been recorded charter effort in the EMBA in the past 5 years. Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact game fishers' functions, interests or activities due to the location offshore and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Titleholders and Operators			
Chevron Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Western Gas	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Exxon Mobil Australia Resources Company	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Shell Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
INPEX Alpha Ltd	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Carnarvon Energy Ltd	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
BP Developments Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Osaka Gas Gorgon	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Tokyo Gas Gorgon	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
JERA Gorgon	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
PE Wheatstone	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Kyushu Electric Wheatstone	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Eni Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Fugro Exploration	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Finder No 9 /10 / 17	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
KUFPEC	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Santos NA Energy Holdings / Santos Ltd / Santos WA Northwest / Santos Offshore // Santos (BOL) / Santos WA PVG	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
OMV Australia / Sapura OMV Upstream	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
JX Nippon O&G Exploration (Australia)	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
National Energy Resource Australia (NERA) Collaborative Seismic Environment Plan Project (CSEP) acting for a consortium of operators	Titleholder or Operator	Woodside has applied its methodology for 'Additional Persons' and 'Titleholders and Operators' under regulation 11A(1)(d). During the course of preparing the EP, NERA CSEP self-identified and requested to be consulted. Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Peak Industry Representative bodies			
APPEA	Represents the interests of oil and gas explorers and producers in Australia.	Woodside has applied its methodology for 'Peak Industry Representative bodies' under regulation 11A(1)(d). APPEA's responsibilities are identified as having an intersect with Woodside's planned activities in the EMBA.	Yes
Traditional Custodians and nominated representative corporations			
Murujuga Aboriginal Corporation (MAC)	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). MAC is the Nominated Representative Corporation under the Burrup and Maitland Industrial Estates Agreement (BMIEA), which is coastally adjacent to the EMBA and underpins land access for the onshore component of the Scarborough Project. The EMBA does not overlap the Murujuga National Park. MAC was established to represent the members of competing Native Title claims over Murujuga, collectively known as the Ngarda Ngardi and comprising Marduhunera, Ngardluma,	Yes

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Ngarluma Aboriginal Corporation (NAC)	Representative Aboriginal Corporation	<p>Yaburara, Yindjibarndi and Wong-Goo-Ti-Oo people. The determination of the competing Native Title claims resulted in no native title being found over the lands subject to the BMIEA or below the low water mark.</p> <p>MAC also owns and co-manages the Murujuga National Park, is responsible for the Dampier Archipelago National Heritage Place and is progressing the World Heritage nomination of the Murujuga Cultural Landscape.</p> <p>Woodside has consulted with MAC in regard to the Scarborough Project area generally since 2018 and MAC has been involved in ethnographic surveys that included the planned activities of this EP.</p> <p>As discussed further below, Woodside engaged YMAC as the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia to confirm the best approach to confirm additional cultural values (if any) for the broader Scarborough Project, the scope of which included the proposed activity for this EP. YMAC advised that the most appropriate stakeholders for the Scarborough project generally are MAC and NAC, who are not represented by YMAC (refer to Table 5-4).</p> <p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Ngarluma/Yindjibarndi native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which NAC and the Yindjibarndi Aboriginal Corporation are the Registered Native Title Body Corporates for.</p> <p>NAC is party to the RTIO Ngarluma Indigenous Land Use Agreement (Body Corporate Agreement), which is coastally adjacent to the EMBA.</p> <p>As noted above (and discussed further below), Woodside sought guidance from YMAC as the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia to confirm the best approach to confirm additional cultural values (if any) for the broader Scarborough Project, the scope of which included the proposed activity for this EP. YMAC advised that the most appropriate stakeholders for the Scarborough project generally are MAC and NAC, who are not represented by YMAC (refer to Table 5-4).</p>	Yes
Wirrawandi Aboriginal Corporation (WAC)	Representative Aboriginal Corporation	<p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Yaburara & Mardudhunera People claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which WAC is the Registered Native Title Body Corporate for.</p>	Yes

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Nganhurra Thanardi Garrbu Aboriginal Corporation (NTGAC)	Representative Aboriginal Corporation	<p>WAC is party to the Cape Preston Project Deed (YM Mardie ILUA), Cape Preston West Export Facility ILUA, Kuruma Marthudunera and Yaburara and Coastal Mardudhunera ILUA and KM & YM ILUA, which are coastally adjacent to the EMBA.</p> <p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Gnulli, Gnulli #2 and Gnulli #3 - Yinggarda, Baiyungu and Thalanyji People native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which the Baiyungu, Thalanyji and Yinggarda people are party to. The NTGAC and YAC are the Registered Native Title Body Corporates holding native title on behalf of the Baiyungu, Thalanyji and Yinggarda people.</p> <p>The NTGAC is also party, with the WA State Government, to the Ningaloo Conservation Estate Indigenous Land Use Agreement (the ILUA) which is coastally adjacent to the EMBA. The NTGAC is responsible for the joint management of the inner Ningaloo Marine Park (State Waters), the Cape Range National Park and new conservation areas extending along the Ningaloo Coast, which runs in parallel to the outer Ningaloo Marine Park in Commonwealth waters.</p> <p>The NTGAC's nominated representative is the YMAC and the NTGAC executive officer and contact officer pursuant to the Corporations (Aboriginal and Torres Strait Islander) Act 2006 is employed by YMAC. Woodside has therefore consulted the NTGAC, via YMAC.</p>	Yes
Yinggarda Aboriginal Corporation (YAC)	Representative Aboriginal Corporation	<p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Gnulli, Gnulli #2 and Gnulli #3 - Yinggarda, Baiyungu and Thalanyji People native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which the Baiyungu, Thalanyji and Yinggarda people are party to. The NTGAC and YAC are the Registered Native Title Body Corporates holding native title on behalf of the Baiyungu, Thalanyji and Yinggarda people.</p> <p>The YAC nominated representative was the YMAC and the YAC executive officer and contact officer pursuant to the Corporations (Aboriginal and Torres Strait Islander) Act 2006 is employed by YMAC. Woodside therefore consulted YAC, via YMAC. Woodside was advised that as of late April 2023, the nominated representative for YAC was now Gumala Aboriginal Corporation.</p>	Yes

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Robe River Kuruma Aboriginal Corporation (RRKAC)	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). There are no native title claims that the RRKAC is party to overlapping the EMBA or coastally adjacent to the EMBA. The RRKAC is party to the RTIO Kuruma Marthudunera People ILUA, Kuruma Marthudunera and Yaburara and Coastal Marthudunera ILUA and KM & YM ILUA, which are coastally adjacent to the EMBA.	Yes
Yindjibarndi Aboriginal Corporation	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). The Ngarluma/Yindjibarndi native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which NAC and the Yindjibarndi Aboriginal Corporation are the Registered Native Title Body Corporates for.	Yes
Buurabalayji Thalanyji Aboriginal Corporation (BTAC)	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). The Thalanyji native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which BTAC is the Registered Native Title Body Corporate for. BTAC is also party to the Macedon ILUA which is coastally adjacent to the EMBA.	Yes
Native Title Representative Bodies			
Yamatji Maripa Aboriginal Corporation (YMAC)	Native Title Representative Body	Woodside has applied its methodology for 'Native Title Representative Bodies' under regulation 11A(1)(d). YMAC is the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia. As such, they are not a Prescribed or Registered Native Title Body Corporate but exist to assist native title claimants and holders. The NTGAC's nominated representative is YMAC. Woodside has therefore consulted the NTGAC via YMAC. YMAC was also the nominated representative for YAC. Woodside was advised that as of late April 2023, the nominated representative for YAC is now Gumala Aboriginal Corporation. Woodside contacted YMAC to seek guidance with respect to the appropriate Traditional Custodian group(s) to engage with respect to the proposed activity where this was not clear.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Historical cultural heritage groups or organisations			
Western Australian Museum	Manages 200 shipwreck sites of the 1,500 known to be located off the Western Australian coast.	Woodside has applied its methodology for 'Historical cultural heritage groups or organisations' under regulation 11A(1)(d). There are no known shipwrecks overlapping the EMBA which the Western Australian Museum may be responsible for.	No
Local government and community representative groups or organisations			
Shire of Exmouth	Local government governed by the Local Government Act 1995 representing the suburbs and localities of Exmouth, Learmonth and North West Cape.	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The Shire of Exmouth's area of responsibility does not overlap the EMBA. The Shire of Exmouth was consulted as a member of the Exmouth Community Reference Group. Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess the Shire of Exmouth as a relevant person.	Yes
City of Karratha	Local government governed by the Local Government Act 1995 representing the suburbs and localities of Baynton, Baynton West, Bulgarra, Cossack, Dampier, Gap Ridge, Karratha, Karratha Industrial Estate, Jingarri, Madigan, Millars Well, Nickoi, Pegs Creek, Point Samson, Roebourne, Whim Creek and Wickham.	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The City of Karratha's area of responsibility does not overlap the EMBA. The City of Karratha was consulted as a member of the Karratha Community Liaison Group. Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess the City of Karratha as a relevant person.	Yes
Exmouth Community Reference Group (CRG) Base Marine Bgahwan Marine	The Exmouth CRG represents the interests of a range of local government, industry and community organisations in relation to	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The Exmouth CRG's area of responsibility under its terms of reference overlaps the EMBA.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
<p>Cape Conservation Group Inc. DBCA Department of Defence Department of Transport Exmouth Bus Charter Exmouth Chamber of Commerce and Industry Exmouth District High School Exmouth Freight and Logistics Exmouth Game Fishing Club Exmouth Tackle and Camping Supplies Exmouth Visitors Centre Exmouth Volunteer Marine Rescue Fat Marine Gascoyne Development Commission Gun Marine Services Ningaloo Lodge Offshore Unlimited Shire of Exmouth BHP Petroleum Santos Community Member</p>	<p>oil and gas matters in the Exmouth region.</p>		
<p>Karratha Community Liaison Group (KLG) WA Police</p>	<p>The KLG is the recognised community group that represents the interests of a range of local government,</p>	<p>Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The KLG's area of responsibility under its terms of reference does not overlap the EMBA.</p>	<p>Yes</p>

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Karratha Health Care Development WA Ngarluma Yindjibarndi Foundation Ltd (NYFL) Department of Education Pilbara Ports Authority Regional Development Australia Pilbara Development Commission Dampier Community Association City of Karratha Karratha & Districts Chamber of Commerce and Industry Horizon Power Murujuga Aboriginal Corporation (MAC)* Department of Local Government, Sport and Cultural Industries *MAC was consulted directly as described above.	industry and community organisations in relation to oil and gas matters in the Pilbara region.	Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess the KLG as a relevant person.	
Other non-government groups or organisations			
350 Australia (350A)	Non-government organisation	During the course of preparing the EP, 350A self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d). Woodside has assessed that 350A's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Australasian Centre for Corporate Responsibility (ACCR)	Non-government organisation	<p>activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine ACCR's relevance for the proposed activity.</p> <p>Woodside has assessed that ACCR's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact ACCR at its discretion in line with Section 5.3.4.</p>	No
Australian Conservation Foundation (ACF)	Non-government organisation	<p>During the course of preparing the EP, ACF self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that ACF's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	Yes
Australian Marine Conservation Society (AMCS)	Non-government organisation	<p>Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine AMCS's relevance for the proposed activity.</p> <p>Woodside has assessed that AMCS's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess AMCS as a relevant person.</p>	Yes
Climate Council	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine Climate Council's relevance for the proposed activity.</p> <p>Woodside has assessed that Climate Council's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact Climate Council at its discretion in line with Section 5.3.4.</p>	No
Conservation Council of Western Australia (CCWA)	Non-government organisation	<p>During the course of preparing the EP, CCWA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
		<p>has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that CCWA's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	
Doctors for the Environment (DEA)	Non-government organisation	<p>During the course of preparing the EP, DEA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that DEA's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	No
Extinction Rebellion WA (XRWA)	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine XRWA's relevance for the proposed activity.</p> <p>Woodside has assessed that XRWA's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact XRWA at its discretion in line with Section 5.3.4.</p>	No
Friends of Australian Rock Art. Inc (FARA)	Non-government organisation	<p>During the course of preparing the EP, FARA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that FARA's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	No
Greenpeace Australia Pacific (GAP)	Non-government organisation	<p>During the course of preparing the EP, GAP self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
International Fund for Animal Welfare (IFAW)	Non-government organisation	<p>Woodside has assessed that GAP's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine IFAW's relevance for the proposed activity.</p> <p>Woodside has assessed that IFAW's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact IFAW at its discretion in line with Section 5.3.4.</p>	No
Lock The Gate Alliance (LTGA)	Non-government organisation	<p>During the course of preparing the EP, LTGA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that LTGA's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	No
Market Forces	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine Market Force's relevance for the proposed activity.</p> <p>Woodside has assessed that Market Force's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact Market Force at its discretion in line with Section 5.3.4.</p>	No
Say No to Scarborough Gas (SNTSG)	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine SNTSG's relevance for the proposed activity.</p> <p>Woodside has assessed that SNTSG's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Sea Shepherd Australia (SSA)	Non-government organisation	Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine SSA's relevance for the proposed activity. Woodside has assessed that SSA's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2). Under subregulation 11 A 1 (e), Woodside, at its discretion, chose to assess SSA as a relevant person.	Yes
The Wilderness Society (TWS)	Non-government organisation	Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine TWS's relevance for the proposed activity. Woodside has assessed TWS's public website material and feedback, with the latter demonstrating an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).	Yes
World Wildlife Fund (WWF) Australia	Non-government organisation	Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine WWF's relevance for the proposed activity. Woodside has assessed that WWF's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2). Woodside chose to contact WWF at its discretion in line with Section 5.3.4 .	No
Research institutes and local conservation groups or organisations			
University of Western Australia (UWA)	Research institute	Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine UWA's relevance for the proposed activity. There is no known research being undertaken by the UWA that intersects within the EMBA. Woodside chose to contact UWA at its discretion in line with Section 5.3.4 .	No
Western Australian Marine Science Institution (WAMSI)	Research institute	Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine WAMSI's relevance for the proposed activity. There is no known research being undertaken by WAMSI that intersects within the EMBA	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth Scientific and Industrial Research Organisation (CSIRO)	Research institute	Woodside chose to contact WAMSI at its discretion in line with Section 5.3.4 . Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine CSIRO's relevance for the proposed activity. There is no known research being undertaken by CSIRO that intersects within the EMBA. Woodside chose to contact CSIRO at its discretion in line with Section 5.3.4 .	No
Australian Institute of Marine Science (AIMS)	Research institute	Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine AIMS's relevance for the proposed activity. There is no known research being undertaken by AIMS that intersects within the EMBA. Woodside chose to contact AIMS at its discretion in line with Section 5.3.4 .	No
Other			
Save Our Songlines (SOS) and/ or █████ and/ or █████ individuals █████ and/ or █████	Representatives of Non-Government Organisation Save Our Songlines and/ or individuals █████ and/ or █████	Woodside has applied its methodology for 'Traditional Custodians and nominated representative corporations' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine Save Our Songlines (SOS) and/ or █████ and/ or █████ relevance for the proposed activity. During the course of preparing the EP, Save Our Songlines and/ or █████ and/ or █████ self-identified and requested to be consulted on Scarborough EPs. Woodside has assessed that SOS and/ or █████ and/ or █████ feedback demonstrates an interest with the proposed activity.	Yes
Woodside Come Clean	Campaign website	Woodside Come Clean is not a registered organisation (i.e. no Australian Business Number (ABN)) and has no contact details publicly available. As this is not a group or organisation, but rather a campaign website, it would not be reasonable for Woodside to consider relevance for the proposed activity, nor attempt to consult. Irrespective, Woodside has reviewed the Woodside Come Clean public website material and determined that the material does not demonstrate any intersect with potential direct impacts specific to the proposed petroleum activity, while remaining in accordance with the intended outcome of consultation (as set out Section 5.2). Woodside notes that the Woodside Come Clean campaign website links to Say No to Scarborough Gas, which Woodside has consulted for the proposed activity.	No

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5.8 Consultation activities and additional engagement

5.8.1 Seismic EP Consultation

Woodside has been conducting extensive consultation with relevant persons for this EP since 2021 when NOPSEMA's public consultation was conducted. This public consultation process occurred in accordance with subregulation 11 B. In this process, the Regulator invited comments from the public on this EP for 30 days between 17 October and 17 November 2021.

5.8.1.1 General and Traditional Custodian Consultation Activities

- Woodside advertised the planned activities proposed for this EP in the national, state and relevant local newspapers including The Australian, The West Australian, Pilbara News, Midwest Times, North West Times (18 January 2023) and Geraldton Times (20 January 2023) (see Appendix F, reference 1.114). Regional newspapers do not require subscription and are available and in some cases delivered directly to households. All communities within or adjacent to the EMBA had access to this information via this media. No direct comments or feedback were received from the advertisements.
- A Consultation Information Sheet was provided to relevant persons and persons Woodside chose to contact (see Section 5.3.4), which included details such as an activity overview, maps, a summary of key risks and/or impacts and management measures (Appendix F, reference 1.1).
- An activity update Consultation Information Sheet was provided to relevant persons and persons Woodside chose to contact (see Section 5.3.4), which included an update regarding planned activities, information regarding the EMBA's for this EP and additional information relating to mitigation and management measures for this EP (Appendix F, reference 1.39).
- Since the commencement of the initial consultation period (31 August 2021), the Stakeholder Consultation Information Sheet has also been available on Woodside's website and the activity update Consultation Information Sheet has been available on the Woodside website since 17 January 2023. The Information Sheets include a toll-free 1800 phone number and Woodside's feedback email address (feedback@woodside.com.au).
- Additional targeted information was provided to relevant marine users including Commonwealth and State fisheries, fishery representative bodies, AHO and AMSA – Marine Safety. The targeted information included maps and additional information relevant to the specific category of persons. The relevant persons had a 30-day period in which to provide feedback.
- From 3 May 2023, Woodside commenced a geotargeted sponsored social media campaign (Appendix F, reference 1.117) to various local government authorities that are within or coastally adjacent to the EMBA for the proposed activities.
- The campaign brought the proposed activity to the attention of persons who may be interested and advised persons or organisations on how they can find out about Woodside's proposed activities by visiting Woodside's website.
- Where appropriate, Woodside conducted phone calls and meetings with relevant persons.
- Where appropriate, targeted follow-up emails were sent to relevant persons who had not provided a response prior to the close of the target feedback period.
- Where feedback was sought and consultation information had been publicly available for an extended period, and the consultation period had closed, Woodside provided a further 14-day period for feedback. Woodside considers this to be a reasonable period for consultation in

accordance with the Regulations given the extended timeframe the consultation information had been publicly available to interested parties. For this EP, this includes a public comment period (see above), consultation information being publicly available on Woodside's website, newspaper advertising in national, state and local newspapers and the EP being published for assessment and available on the NOPSEMA website.

- Woodside considered relevant person responses and assessed the merits and relevance of objections and claims about the potential adverse impact of the proposed activity set out in the EP, in accordance with the intended outcome of consultation (see Section 5.2).
- Woodside hosted community reference group information sessions with the Karratha Community Liaison Group and the Exmouth Community Liaison Group, where updates on the proposed activity were provided.

Consultation activities undertaken with relevant persons are summarised at **Table 5-4**.

Engagement undertaken with persons or organisations Woodside assessed as not relevant but chose to contact (see **Section 5.3.4**) are summarised **Table 5-5**.

5.8.1.2 Traditional Custodian Specific Consultation

Woodside provides persons or organisations, including individual Traditional Custodians, with the opportunity to be aware of Woodside's proposed activities and to participate in consultation. Woodside's First Nations Communities Policy is guided by the United Nations Declaration on the Rights of Indigenous People (UNDRIP) which respects Traditional Custodians by directing consultations through their nominated representative body (referred to in UNDRIP as "their own representative institutions". This has been reinforced throughout consultation with PBCs who have requested that Woodside engage with them as the representative bodies for that Traditional Custodian group.

Woodside asks nominated representative bodies and the Native Title Representative Bodies to identify individuals, and also enables individuals to self-identify in response to national and local advertising, social media and community engagement opportunities. Woodside does not directly approach individuals for consultation, because this is misaligned with UNDRIP and undermines the role of the nominated representative bodies. Approaching individuals directly is an outdated practice which is no longer considered acceptable because of divisions it has been shown to cause in communities.

However, individuals are given the opportunity to self-identify, consult and provide feedback on the proposed activity. In these circumstances, Woodside will engage individuals as relevant persons and also advise the nominated representative body of the consultation where it relates to cultural values. Woodside has not been directed to engage individual Traditional Custodians by nominated representative bodies for this proposed activity, however Woodside has nevertheless provided reasonable opportunity for individual Traditional Custodians to engage in consultation through appropriate and adapted consultation methods. These methods are consistent with the requirements for notification under the Native Title Act (1993), which requires notification of the Native Title Representative Body, the PBC (or nominated representative) and notification through newspapers. The notification process has been selected as a practical and pragmatic analogue for consultation, rather than the authorisation process which aims to seek authorisation of agreements and Native Title claims under the Native Title Act³.

The most effective consultation methods for this activity, specifically designed for Traditional Custodians, to ensure that information is provided in a form that is readily accessible and appropriate are provided below:

³ • Santos NA Barossa Pty Ltd v Tipakalippa [2022] FCAFC 193, at [104]

- Direct engagement with nominated representative bodies via the contact listed on the ORIC website, requesting advice on how they would like to be engaged and asking whether other members and/or individuals should be consulted. This has resulted in:
 - Meetings with directors, elders and any nominated representatives, on country or in Perth
 - Requests and offers of resourcing to enable and support consultation
 - Exchange of written feedback and correspondence
 - A bespoke targeted Consultation Summary Sheet, developed and reviewed by Indigenous representatives to ensure content is appropriate to the intended recipients, was provided to relevant Traditional Custodian groups (**Appendix F**, reference 1.40). and phone calls to provide context to the consultation made.
- Ongoing efforts were made to engage and develop relationships with these bodies via a variety of means such as email, phone calls, alternative contacts, texts, social media and in some cases physical visits.
- Consultation meetings with attendees decided by Traditional Custodian groups, supported by senior Woodside representatives, subject matter experts, First Nations Relations advisers with skills and experience in community engagement. Meetings are developed through a two-way consultation process to ensure effective information sharing via:
 - Mutually agreed agenda avoiding time pressure
 - Visual aids such as posters, presentations, simplified technical videos and real-world pictures and footage
 - Emphasis on potential planned and unplanned risks and impacts
 - Ample opportunity for questions and feedback
 - Discussion about ongoing relationship development and opportunities
 - Distribution of hard-copy Consultation Information Sheets (**Appendix F**, reference 1.1 and 1.39) and bespoke targeted Consultation Summary Sheets (**Appendix F**, reference 1.40)
 - Meeting all costs such as sitting fees, travel, legal support and executive support and other support required
- Woodside has a geotargeted sponsored social media campaign (Appendix F, reference 1.117) to various communities that are coastally adjacent to the EMBA for the proposed activities.
- The wide-reaching campaign brought the proposed activity to the attention of persons who may be interested and advised persons or organisations how they can find out about Woodside's proposed activities by visiting Woodside's website, which details the intent of consultation with relevant persons under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth). The reach of this campaign is shown in Appendix F, reference 1.117), providing the opportunity to consult via over 139,000 views to date across various regions.
- These social media posts were developed with input from Indigenous representatives. Social media is a highly effective means to engage Indigenous audiences as outlined in Indigenous Digital Life (Professor Carlson, 2021). Advertisements used language and information appropriate to Indigenous audiences. Feedback from community engagements indicates a high level of penetration for this technique.
- Community information barbecue sessions were held on 5 May 2023, 10 May 2023, 19 May 2023 and 24 May 2023 in Roebourne. Roebourne was primarily selected for these community

information sessions because of the geographic proximity to Scarborough planned activities, for example Murujuga. This is in contrast to instances where Woodside was directly requested by the relevant Native Title Representative Body not to hold community information session, due to events such as floods and for cultural reasons.

- Ahead of the events, Woodside advertised the sessions via the means below, which provided the opportunity for local individuals to become aware of the event and have access to experts and information about the activity. The methods used to promote these consultation opportunities were developed with input from Indigenous representatives and were adapted to incorporate culturally appropriate and accessible language to encourage engagement and understanding of Woodside's proposed activities:
 - Posters (**Appendix F**, reference 1.116) displayed on community notice boards, local businesses and government agencies
 - The shared Roebourne Community Calendar which is understood to have wide usage
 - Posting and paid boosting on Woodside's social media (**Appendix F**, reference 1.116), as well as re-sharing via local third-party media accounts. Feedback from the sessions indicated this was a very effective way to reach Traditional Custodians.
 - Local door-knocking to ensure maximum awareness of the community information session and opportunity to consult on Woodside's proposed activities.
 - Representatives from Woodside, including project personnel and a heritage specialist equipped to answer technical questions, attended the event. Copies of the Consultation Information Sheets and bespoke targeted Consultation Summary Information Sheets were available to attendees. Community members were able to engage with Woodside representatives to understand the proposed activity and how it may affect them, ask questions and provide their feedback.
- Woodside hosts regular heritage meetings to which Mardudhunera, Ngarluma, Yaburara and Wong-Goo-Tt-Oo representatives are invited. Meetings were held on 19 March 2021, 10 June 2021, 20 September 2021, 13 December 2021, 28 March 2022, 17 June 2022, 25 October 2022 and 21 March 2023, where updates on the proposed activity were provided.

Woodside has employed a diverse range of techniques to allow relevant persons to become aware of the proposed activity and how it may affect their functions activities or interests, and understand their ability to provide feedback. The combination of PBC engagement meetings, traditional print media, social media and face-to face community interaction was designed with input from Indigenous representatives and adapted to the audience, so that it provides a wide-ranging opportunity to consult.

Table 5-4: Consultation report with relevant persons or organisations.

Commonwealth and WA State Government Departments or Agencies – Marine		
<p>Australian Border Force (ABF)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed ABF advising of the proposed activity (Appendix F, reference 1.2) and provided a Consultation Information Sheet. On 27 January 2023, Woodside emailed ABF with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy’s Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has addressed maritime security-related issues in Section 6 of this EP based on previous offshore activities.</p> <p>No additional measures or controls are required.</p>
<p>Australian Fisheries Management Authority (AFMA)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed AFMA advising of the proposed activity (Appendix F, reference 1.3) and provided a Consultation Information Sheet, a fisheries map and a list of previous seismic surveys. On 4 June 2021, AFMA responded, advising it was unable to provide comment on specific proposals, and directed Woodside to continue consulting with all fishers who have entitlements to fish within the proposed area via the relevant fishing industry associations or directly with fishers who hold entitlements in the area. On 3 February 2023, Woodside emailed AFMA with an update on the proposed activity (Appendix F, reference 1.71) and provided an updated Consultation Information Sheet and fisheries maps. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.77). 		
<p>Summary of Feedback, Objection or Claim</p> <p>AFMA has requested Woodside consult with operators who have entitlements to fish within the proposed area.</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy’s Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided information to relevant fishery licence holders as well as representative organisations on behalf of Commonwealth fishery licence holders who have entitlements to fish within the proposed area.</p> <p>Woodside has addressed AFMA’s feedback, including confirming that Woodside had provided information to relevant fishery licence holders as well as representative organisations on behalf of Commonwealth fishery licence holders who have entitlements to fish within the proposed area.</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Australian Hydrographic Office (AHO) / Australian Hydrographic Service (AHS)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed the AHO advising of the proposed activity (Appendix F, reference 1.4) and provided a Consultation Information Sheet, and shipping lanes map (Appendix F, reference 1.5). On 27 January 2023, Woodside emailed AHO with an update on the proposed activity (Appendix F, reference 1.53) and provided an updated Consultation Information Sheet and fisheries maps. Woodside confirmed it would make available a shipping lane map as soon as possible. On 30 January 2023, the AHO responded and acknowledged receipt of Woodside’s consultation email. On 28 February 2023, Woodside emailed AHO and provided an updated shipping lane map (Appendix F, reference 1.106). On 1 March 2023, the AHO responded and acknowledged receipt of Woodside’s consultation email. On 9 March 2023 Woodside emailed AHO with a corrected version of the shipping lane map (Appendix F, reference 1.106). On 10 March 2023, the AHO responded and acknowledged receipt of Woodside’s consultation email. 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	AHO has acknowledged receipt of Woodside's consultation emails. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	Woodside will notify the AHO no less than four working weeks before operations commence, as referenced as a C 1.1 in this EP. No additional measures or controls are required.
Australian Maritime Safety Authority (AMSA) - Marine Safety		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> • On 13 May 2021, Woodside emailed AMSA advising of the proposed activity (Appendix F, reference 1.6) and provided a Consultation Information Sheet, and shipping lanes map (Appendix F, reference 1.5). • On 18 May 2021, AMSA emailed Woodside requesting: <ul style="list-style-type: none"> - The AHO be contacted no less than four working weeks before operations commence for the promulgation of related notices to mariners. - AMSA's Joint Rescue Coordination Centre (JRCC) be notified at least 24–48 hours before operations commence - Provide updates to the AHO and JRCC should there be changes to the activity. - Vessels exhibit appropriate lights and shapes to reflect the nature of operations and comply with the International Rules of Preventing Collisions at Sea. - AMSA provided advice on obtaining vessel traffic plots, including digital datasets and maps. • On 22 July 2021, Woodside responded to AMSA's feedback and confirmed it would address AMSA's requests. • On 27 January 2023, Woodside emailed AMSA with an update on the proposed activity (Appendix F, reference 1.53) and provided an updated Consultation Information Sheet and fisheries maps. <ul style="list-style-type: none"> - Woodside confirmed it would make available a shipping lane map as soon as possible. • On 31 January 2023, AMSA emailed Woodside requesting: <ul style="list-style-type: none"> - Additional information relating to moorings and their potential impact on shipping traffic. - Woodside to confirm its current GIS data so that AMSA can map it and assess navigation safety. - Woodside to send its updated Shipping Lane figures. • On 10 February 2023, AMSA emailed Woodside and reiterated its 31 January 2023 request for additional information. • On 15 February 2023, AMSA emailed Woodside and reiterated its 31 January 2023 and 10 February 2023 request for additional information. • On 16 February 2023, Woodside received a phone message from AMSA requesting digital data regarding the proposed activity. • On 17 February 2023, Woodside had a phone conversation with AMSA to clarify the data required and was advised that AMSA would like the operational area polygons in shapefile format for the proposed activity. • On 17 February 2023, Woodside emailed AMSA the operational area polygons in shapefile format for the proposed activity. • On 21 February 2023, AMSA emailed Woodside: <ul style="list-style-type: none"> - Provided a vessel traffic plot showing AIS data and an updated vessel traffic plot for the Scarborough area of interest. - AMSA reiterated its 31 January 2023 request. • On 28 February 2023, Woodside emailed AMSA: <ul style="list-style-type: none"> - Provided additional information relating to the moorings (Appendix F, reference 1.105). - Provided an updated shipping lane map (Appendix F, reference 1.106). • On 3 March 2023 AMSA emailed Woodside: <ul style="list-style-type: none"> - Requested clarification on the vessel traffic plots provided and how the Environment that May Be Affected (EMBA) areas will actually be affected by working vessels, support craft and associated activities. - AMSA commented that the EMBA's are quite large unique areas, so AMSA is curious about the extent of vessel traffic and activity within these areas and lines of traffic and charted shipping fairways. • On 8 March 2023 Woodside emailed AMSA advising (Appendix F, reference 1.108): <ul style="list-style-type: none"> - The environment that may be affected (EMBA) is the largest spatial extent where the Petroleum Activities Program could potentially have an environmental consequence (direct or indirect impact). - The broadest extent of the EMBA takes into consideration planned and unplanned activities, and for this Environment Plan (EP) is determined by a highly unlikely release of marine diesel to the environment as a result of vessel collision. - The EMBA does not represent the extent of predicted impact of the highly unlikely marine diesel release. Rather, the EMBA represents the merged area of many possible paths a highly unlikely hydrocarbon release could travel depending on the weather and ocean conditions at the time of the release. This means in the highly unlikely event a hydrocarbon release does occur, the entire EMBA will not be affected and the specific and minimal part of the EMBA that is affected will only be known at the time of the release. - Woodside also provided an updated version of the shipping lane map noting there was an error on the previous version. 		

<p>Summary of Feedback, Objection or Claim</p> <p>AMSA has provided feedback relating to:</p> <ul style="list-style-type: none"> • Notification requirements • Update requirements • Vessel light and shapes <p>AMSA requested further information relating to:</p> <ul style="list-style-type: none"> • Moorings and their potential impact on shipping traffic • GIS data • Shipping Lane figures • Digital data • Vessel traffic plots and how the EMBA will be affected by working vessels, support craft and associated activities 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed AMSA's requests and provided additional information (see above and within the relevant response contained within Appendix F).</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside will notify AMSA's JRCC at least 24–48 hours before operations commence, as referenced as C 1.2 in this EP.</p> <p>Woodside will notify AHO no less than four working weeks before operations commence, as referenced as a C 1.1 in this EP.</p> <p>Woodside considers the measures and controls in the EP are appropriate.</p>
<p>Australian Maritime Safety Authority (AMSA) – Marine Pollution</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> • On 13 May 2021, Woodside emailed AMSA advising of the proposed activity (Appendix F, reference 1.7) and provided a Consultation Information Sheet, and shipping lanes map (Appendix F, reference 1.5). • On 6 July 2021, Woodside emailed AMSA and provided the First Strike Plan (Appendix F, reference 1.25). • On 27 January 2023, Woodside emailed AMSA with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. • On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has addressed oil spill preparedness and response strategy planning in Appendix D. No additional measures or controls are required.</p>

Department of Climate Change, Energy, the Environment and Water Agriculture (DCCEE) / Department of Agriculture, Fisheries and Forestry (DAFF) – Fisheries (formerly DAWF)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 13 May 2021, Woodside emailed DAWF advising of the proposed activity considering biosecurity matters (Appendix F, reference 1.8) and provided a Consultation Information Sheet, and fisheries map (Appendix F, reference 1.9).
- On 25 May 2021, DAWF responded noting the information required and requested Woodside communicate future developments with the AFMA and the relevant fishing industry representation organisations.
- On 17 December 2021, Woodside emailed DAWF (prompted by Woodside to seek overall clarification):
 - Woodside sought clarification around the Blue Whale CMP, the Department's Guideline and NOPSEMA's FAQ in relation to the definition of, and Woodside's interpretation of BIA.
 - Woodside requested clarification of its understanding of the documents on the DAWF website, (Blue Whale CMP) which state that "BIAs are not defined under the EPBC Act, but they are areas that are particularly important for the conservation of protected species and where aggregations of individuals display biologically important behaviour such as calving, foraging, resting or migration. BIAs have been identified using expert scientific knowledge about species' distribution abundance and behaviour".
 - Woodside clarified that consequently, distribution in itself, is not a BIA (for blue whales); whereas areas where biologically important behaviour such as calving, foraging, resting or migration clearly are BIAs.
- On 20 December 2021, DAWF emailed Woodside:
 - DAWF advised that the definition provided is the agreed working definition of BIAs and this interpretation is correct. BIAs are not defined or described under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). They are however a geospatial tool used to inform regulatory decision-making given the biologically critical behaviours that they represent.
 - DAWF advised that the assumption is correct, that the entire distribution of the blue whale is not considered a BIA. The 'distribution BIA' for the blue whale, as designated in the National Conservation Values Atlas (NCVA) does not constitute a BIA (that represents an area where biologically important behaviour is displayed, such as foraging and migration for the blue whale). DAWF believe the distribution BIA was included in the NCVA following development of the Conservation Management Plan for the Blue Whale (CMP) to flag the importance of their range.
- On 30 March 2022, Woodside emailed DCCEE to ensure DCCEE was aware NOPSEMA had requested correspondence between DCCEE and
 - Woodside which must be completed with regarding blue whale distribution and BIAs. Woodside advised details of the correspondence would be included for NOPSEMA's assessment of this EP.
- On 30 March 2022, DCCEE thanked Woodside for the advice and that DCCEE had been in contact with NOPSEMA and were aware of this requirement.
- On 3 February 2023, Woodside emailed DCCEE / DAFF - Fisheries with an update on the proposed activity (Appendix F, reference 1.54) and provided an updated Consultation Information Sheet and fisheries maps.
- On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.92).

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>In the course of preparing this and other Woodside EPs, DCCEE has provided clarification around the Blue Whale CMP, the Department's Guideline and NOPSEMA's FAQ in relation to the definition of BIAs. Woodside's interpretation of the Blue Whale CMP advice has been applied in the EP, see Section 4.6.3.1.</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside notes DCCEE clarification around the Blue Whale CMP, the Department's Guideline and NOPSEMA's FAQ in relation to the definition of BIAs. Woodside's interpretation of the Blue Whale CMP advice has been applied in the EP, see Section 4.6.3.1.</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>The Environment Plan demonstrates that the proposed activities are outside the boundaries of a proclaimed Commonwealth Marine Park and identifies that there are no credible impacts to the values of any Commonwealth Marine Parks as a result of planned activities (Section 4.9). While impacts to Commonwealth Marine Parks are possible in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of an incident, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>The Environment Plan demonstrates that there are no known underwater heritage sites or shipwrecks within the Petroleum Activities Area and identifies that there are no credible impacts as a result of planned activities (Section 4.10.1). While impacts to underwater heritage sites or shipwrecks are possible in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of an incident, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>Woodside has addressed maritime biosecurity issues in Section 6.7 of this EP based on previous offshore activities.</p> <p>No additional measures or controls are required.</p>

<p>Department of Defence (DoD)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DoD advising of the proposed activity (Appendix F, reference 1.10) and provided a Consultation Information Sheet, and defence map (Appendix F, reference 1.11). On 15 May 2021, DoD emailed Woodside: <ul style="list-style-type: none"> DoD advised that the activity area is located within the North West Exercise Area (NWXEA) and restricted airspace and unexploded ordnance (UXO) may be present on and in the sea floor within the NWXA. All activities in the area are conducted at Woodside's own risk. DoD advised that the Commonwealth of Australia, represented by the Department of Defence, takes no responsibility for: <ul style="list-style-type: none"> Reporting the location and type of UXO that may be in the areas. Identifying or removing any UXO from these areas. Any loss or damage suffered or incurred by Woodside Energy or any third party arising out of, or directly related to, UXO in the area. DoD require the following notifications: <ul style="list-style-type: none"> DoD - five weeks prior to the commencement of activities. Airservices Australia (if Notice to Airmen notification is required for activities in Restricted Airspace). AHO - three weeks prior to the commencement of activities. On 4 August 2021, Woodside emailed DoD: <ul style="list-style-type: none"> Woodside responded to DoD's feedback and noted the advice provided regarding risks and notification requirements. Woodside confirmed it will notify the Department of Defence at least five weeks prior to the commencement of activities. Woodside requested DoD provide shape files or further specific detail in relation to the mentioned UXO so that Woodside can then map it against the proposed activity. On 4 August 2021, DoD responded and provided a link to its mapping system which identifies UXO locations within the NWXWA. On 10 May 2022 Woodside emailed DoD to clarify the potential risk of UXOs in the Scarborough Development Operational Area. On 13 May 2022 DoD emailed Woodside: <ul style="list-style-type: none"> DoD noted that the UXO risk data has been updated. Currently the UXO webmap has one historical location but it falls outside of the proposed pipeline route. It is reasonable to assess the risk of UXO in the Operational Area to be negligible. On 13 May 2022, Woodside thanked DoD for their email of the same date and the information provided. On 25 August 2022, Woodside emailed DoD: <ul style="list-style-type: none"> Woodside noted DoD had previously confirmed there are no specific UXO records for activities in the North West Exercise Area (NWXEA) and it is reasonable to assess the risk to be negligible. Woodside asked for clarification as to whether the advice that there are no specific records of UXO in the area means that no categorisation is required and so no further advice is required. On 23 September 2022, Woodside followed up on its 25 August 2022 email. On 23 September 2022, DoD emailed Woodside: <ul style="list-style-type: none"> DoD confirmed that the area of the NWXA would be classed as Remote in accordance with its land counterpart. The risk of encountering UXO is Very Low, but not absent. On 27 January 2023, Woodside emailed DoD with an update on the proposed activity (Appendix F, reference 1.55) and provided an updated Consultation Information Sheet. Woodside asked DoD for access to sufficient data or a map of Defence Restricted and Prohibited Areas to inform Woodside's development of defence zone maps and figures for DoD's use. On 20 February 2023, DoD responded thanking Woodside for its email and reiterated previous advice provided on 15 June 2021. DoD also provided Woodside with a figure outlining its restricted airspace and Defence Training Areas off the WA Coast. On 13 March 2023, Woodside emailed DoD and provided an updated defence zone map (Appendix F, reference 1.110). 		<p>Environment Plan Controls</p> <p>Woodside has addressed DoDs expectations on notifications – Defence, restricted air space and AHO (C 1.1 and C 1.5, Table 7-2). AHO have been engaged for the activity and are included in Woodside's activity notification protocols. AHO will be notified four weeks prior to the start of activities.</p> <p>Woodside considers the measures and controls in the EP are appropriate.</p>
<p>Summary of Feedback, Objection or Claim</p> <p>DoD has provided feedback relating to:</p> <ul style="list-style-type: none"> The location of the activity in proximity to the NWXA and the potential presence of UXO. Notification requirements. <p>DoD has provided advice relating to:</p> <ul style="list-style-type: none"> Details of its restricted airspace and Defence Training Areas off the WA Coast. 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has reviewed the proposed activity and the location of the NWXA and UXOs to understand the potential for UXOs to be within the Operational Area. The Learmonth Air Weapons Range (AWR) practice area is approximately 20 km south of the operational area and the location of any UXOs (known to occur) are near Bessieres Island which is located 190 km from the Operational Area. Based on the locations of the proposed activity and advice from DoD, UXO risk in the Operational Area is considered negligible / remote and it was determined there is no credible risk from UXOs for the proposed activity.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	

Department of Primary Industries and Regional Development (DPIRD)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 14 May 2021, Woodside emailed DPIRD (Appendix F, reference 1.24) advising of the proposed activity and provided a Consultation Information Sheet, fisheries map and list of previous seismic surveys.
- On 3 February 2023, Woodside emailed DPIRD with an update on the proposed activity (Appendix F, reference 1.67) and provided an updated Consultation Information Sheet and fisheries maps.
- On 17 February 2023, DPIRD responded noting that as the activity is proposed for waters unlikely to influence fishing activities it has no further comments at this time.
- On 24 February 2023, Woodside emailed DPIRD thanking it for its feedback and confirming that Woodside has consulted state commercial fishery licence holders and recreational fishery licence holders that are active within the EMBA for the proposed activity (Appendix F, reference 1.100).

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>DPIRD has provided feedback that the activity is proposed for waters unlikely to influence fishing activities and it has no further comments at this time.</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside confirmed with DPIRD it has consulted state commercial fishery licence holders and recreational fishery licence holders that are active within the EMBA for the proposed activity. (See this Consultation Report with Commonwealth and State Fisheries.)</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>

Department of Transport (DoT)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 13 May 2021, Woodside emailed DoT advising of the proposed activity (Appendix F, reference 1.15) and provided a Consultation Information Sheet.
- On 18 May 2021, DoT emailed Woodside:
 - Requested that if there is a risk of a spill impacting State waters from the proposed activities, to ensure that DoT is consulted as outlined in the Department of Transport Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements (July 2020).
- On 8 July 2021, Woodside responded to DoT's feedback and confirmed that if there is a risk of a spill impacting State waters, the Department of Transport will be consulted.
- On 9 July 2021, DoT responded and advised it will review.
- On 11 August 2021, DoT responded with comments for review, which sought clarification on priorities, estimates of waste quantities and marine response options.
- On 12 August 2021, Woodside responded to DoT's feedback:
 - Providing feedback on responses priorities.
 - Provided feasible response thresholds.
 - Advised that this EP has a diesel-only scenario.
 - On 19 August 2021, DoT emailed Woodside:
 - DoT advised it didn't have any further comments.
 - DoT requested a copy of the final version of the First Strike Plan once accepted.
- On 19 August 2021, Woodside responded and confirmed that it will send DoT a copy of the First Strike Plan once approved.
- On 27 January 2023, Woodside emailed DoT with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet.
- On 7 February 2023, DoT responded restating its advice from 18 May 2021.
- On 22 February 2023, Woodside responded confirming that if there is a risk of a spill impacting State waters, the Department of Transport will be consulted.

<p>Summary of Feedback, Objection or Claim</p> <p>DoT has provided feedback relating to:</p> <ul style="list-style-type: none"> • Consultation requirements in the event of a spill impacting State waters from any of the proposed activities. • The draft Oil Pollution First Strike Plan and a request for a final accepted version of the plan when available. <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed DoT's feedback regarding the Oil Pollution First Strike Plan and incorporated referenced changes based on feedback.</p> <p>Woodside will send DoT a copy of the First Strike Plan once accepted.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside will provide DoT with a copy of the accepted Oil Pollution First Strike Plan (Appendix 1), as referenced in the OSPRMA (Appendix D).</p> <p>Woodside will consult DoT if there is a spill impacting State waters from the proposed activity, as referenced in the OSPRMA (Appendix D).</p> <p>No additional measures or controls are required.</p>
<p>Commonwealth and WA State Government Departments or Agencies – Environment</p>		
<p>Director of National Parks (DNP)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> • On 13 May 2021, Woodside emailed DNP advising of the proposed activity considering potential risks to Australian marine Parks (Appendix F, reference 1.13), and provided a Consultation Information Sheet. • On 5 July 2021, DNP responded, noting it has no claims or objections. • On 27 January 2023, Woodside emailed DNP with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. • On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.76). • On 24 February 2023, DNP emailed Woodside: <ul style="list-style-type: none"> - DNP noted they have no further comment or objections and claims on the proposed activity. DNP noted that comments on the proposed activity were previously provided to Woodside on 5 July 2021. - DNP requested clarification on the Operational Area (OA). - The Director of National Parks considers the OA to encompass operational activities such as line turns / repositioning, equipment maintenance, deployment and recovery, crew change and resupply. - These are offshore petroleum activities and Commonwealth environment regulatory matters and, as such, should be included in the EP so relevant risks are assessed and effective mitigation applied. • On 8 March 2023, Woodside emailed DNP (Appendix F, reference 1.107): <ul style="list-style-type: none"> - Woodside acknowledged the comments already provided by DNP previously on each of the relevant EPs and that DNP has no further comment or objections and claims. - Copies of DNP's previous responses have been received and have been addressed where relevant within each of the proposed EPs. - Woodside provided clarification that the Operational Area includes both the Active Source Area and a surrounding buffer for the purpose of vessel line turns and other vessel manoeuvres. The seismic source will not be discharged within this buffer. 		
<p>Summary of Feedback, Objection or Claim</p> <p>DNP provided feedback about the Operational Area and that it has no comment on the proposed activity.</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed DNP's feedback and provided additional information on the operational area.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>The Environment Plan demonstrates that the proposed activities are outside the boundaries of a proclaimed Commonwealth Marine Park and identifies that there are no credible impacts to the values of any Commonwealth Marine Parks as a result of planned activities (Section 4.9). While impacts to Commonwealth Marine Parks are possible in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of an incident, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>Woodside will ensure DNP is made aware of any incidences within a marine park for the activity, as per the commitment in the Oil Pollution First Strike Plan (Appendix I; Table 7-4).</p> <p>No additional measures or controls are required.</p>

<p>Department of Biodiversity, Conservation and Attractions (DBCA)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DBCA advising of the proposed activity and provided a Consultation Information Sheet (Appendix F, reference 1.17). On 24 May 2021, DBCA emailed Woodside: <ul style="list-style-type: none"> DBCA advised that based on the documentation provided for review and other readily available information, DBCA has no comments in relation to its responsibilities under the Conservation and Land Management Act 1984 and Biodiversity Conservation Act 2016. On 27 January 2023, Woodside emailed DBCA with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 8 February 2023, DBCA emailed Woodside: <ul style="list-style-type: none"> DBCA advised that based on the documentation provided for review and other readily available information, DBCA has no comments in relation to its responsibilities under the Conservation and Land Management Act 1984 and Biodiversity Conservation Act 2016. 		<p>Environment Plan Controls</p> <p>The Environment Plan demonstrates that the proposed activities are outside the boundaries of a proclaimed State Marine Park and identifies that there are no credible impacts to the values of any State Marine Parks as a result of planned activities (Section 4.9). While impacts to State Marine Parks are not expected in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of a hydrocarbon spill, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>No additional measures or controls are required.</p>
<p>Commonwealth and State Government Departments or Agencies – Industry</p>		
<p>Department of Industry, Science and Resources (DISR) (formerly DISER)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DISR advising of the proposed activity (Appendix F, reference 1.12) and provided a consultation Information Sheet. On 27 January 2023, Woodside emailed DISR with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Department of Mines, Industry Regulation and Safety (DMIRS)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DMIRS advising of the proposed activity (Appendix F, reference 1.14) and provided a Consultation Information Sheet. On 27 January 2023, Woodside emailed DMIRS with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Summary of Feedback, Objection or Claim</p> <p>DBCA provided feedback that it has no comment on the proposed activity. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside acknowledges that DBCA had no comment on the proposed activities. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	

Commonwealth Commercial fisheries and representative bodies

Western Deepwater Trawl Fishery

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 13 May 2021, Woodside emailed licence holders advising of the proposed activity and provided a Consultation Information Sheet and fisheries map (Appendix F, reference 1.18)
- On 3 February 2023, Woodside emailed licence holders with an update on the proposed activity (Appendix F, reference 1.65) and provided an updated Consultation Information Sheet and fisheries map.
- On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86).

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP</p> <p>No additional measures or controls are required.</p>
<p>North West Slope and Trawl Fishery</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside emailed licence holders on the proposed activity (Appendix F, reference 1.65) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86). 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Commonwealth Fisheries Association (CFA)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed the CFA advising of the proposed activity (Appendix F, reference 1.19) and provided a Consultation Information Sheet, fisheries map and list of previous seismic surveys. On 3 February 2023, Woodside emailed CFA on the proposed activity (Appendix F, reference 1.65) and provided an updated Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86). On 22 February 2023, CFA emailed Woodside: <ul style="list-style-type: none"> CFA advised it is not resourced to give feedback on Woodside's Environment Plan. CFA requested to direct enquiries to the associations that represent the directly affected fisheries/fishers. CFA noted that the increasing volume of requests for consultation on EP from oil and gas and more recently windfarm proposals are beyond the capacity of most associations. For this reason, please be prepared to engage those associations on a fee for service basis. On 15 March 2023, Woodside emailed CFA: <ul style="list-style-type: none"> Woodside confirmed it has provided consultation information directly to fishery licence holders that it has assessed as 'relevant persons' for the proposed EP, as well as to their fishery representative bodies. As per Woodside's ongoing consultation approach, feedback continues to be assessed and responded to, as required, through the life of an EP. 		

<p>Summary of Feedback, Objection or Claim</p> <p>CFA provided feedback that it is not resourced to give feedback on Woodside's Environmental Plan and that it should consult with fishery licence holders directly. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed the CFA's feedback, including confirming it has provided consultation information directly to licence holders it has assessed as 'relevant persons' for the proposed EP as well as their fishery representative bodies. Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
<p>State Commercial fisheries and representative bodies</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside sent a letter to the Marine Aquarium Managed Fishery on the proposed activity (Appendix F, reference 1.66) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up letter (Appendix F, reference 1.82). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
<p>Mackerel Managed Fishery (Area 2 and 3)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside sent a letter to the Mackerel Managed Fishery (Area 2 and 3) on the proposed activity (Appendix F, reference 1.81) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up letter (Appendix F, reference 1.97). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
<p>West Coast Deep Sea Crustacean Managed Fishery</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside sent a letter to the West Coast Deep Sea Crustacean Managed Fishery on the proposed activity (Appendix F, reference 1.66) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up letter (Appendix F, reference 1.82). 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Pilbara Line Fishery</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 3 February 2023, Woodside emailed to the Pilbara Line Fishery on the proposed activity (Appendix F, reference 1.72) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.81). 		
<p>Summary of Feedback, Objection or Claim</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Western Australian Fishing Industry Council (WAFIC)</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed WAFIC advising of the proposed activity (Appendix F, reference 1.20) and provided a Consultation Information Sheet, fisheries map and list of previous seismic surveys. On 16 June 2021, WAFIC thanked Woodside for the information. <ul style="list-style-type: none"> WAFIC noted the following risks: <ul style="list-style-type: none"> Mobile invertebrates – Moderate Immobile invertebrates – Low Finfish demersal – Moderate Pelagic – Negligible 		
<ul style="list-style-type: none"> WAFIC noted that commercial fishers have advised them that they are encountering a significant change in catchability of mackerel species following seismic survey activity so fish behaviour and distribution are changing which is having a direct impact on the economic viability of commercial fishers and potential fish stocks for those species. There is an opportunity for further research into this indirect impact to fully understand the effect. WAFIC also noted notwithstanding the above, risk mitigation and control measures should be implemented to ensure all impacts are managed and detailed evidence-based analysis has considered the timing of the survey to minimise impacts to commercial fishing operations and the ecological impacts to fish species. 		
<ul style="list-style-type: none"> On 23 August 2021, Woodside responded, thanking WAFIC for the feedback and confirmed the receptors outlined, and impact of seismic surveys will be considered in the EP, and control measures implemented where relevant. On 3 February 2023, Woodside emailed WAFIC on the proposed activity (Appendix F, reference 1.68) and provided an updated Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.78). On 5 May 2023, Woodside had a phone call with WAFIC to follow up on a number of EPs, including the activities proposed under this EP, and to request any further feedback. Woodside committed to providing WAFIC with a consolidated email outlining all the EPs Woodside is currently consulting WAFIC on for ease of feedback. On 5 May 2023, Woodside sent an email to WAFIC providing the status of feedback on a number of EPs, including the activities proposed under this EP. Woodside advised it would soon be submitting the EP for assessment and requested any further feedback. On 19 May 2023, Woodside had a phone call with WAFIC to follow up on a number of EPs, including the activities proposed under this EP and to request any feedback. 		

<p>Summary of Feedback, Objection or Claim</p> <p>WAFIC provided feedback about risks and communicated advice from commercial fisheries about changes to fish behaviour and distribution, particularly the catchability of mackerel species following seismic survey activity. WAFIC also commented on the implementation of risk mitigation and control measures to minimise impacts. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed WAFIC's feedback and confirmed that the receptors outlined, and impact of seismic surveys will be considered in the EP, and control measures implemented where relevant including application of EPBC controls (Section 6). Woodside has provided consultation information to DPIRD, WAFIC and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7.2 and Control 1.3 in Section 6.6.4 of this EP. No additional measures or controls are required.</p>
<p>Recreational marine users and representative bodies</p>		
<p>Exmouth Recreational Marine Users</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside emailed Exmouth Recreational Marine Users on the proposed activity (Appendix F, reference 1.69) and provided a Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F Appendix F, reference 1.79). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Review process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Gascoyne Recreational Marine Users</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 6 February 2023, Woodside sent a letter to Gascoyne Recreational Marine Users on the proposed activity (Appendix F, reference 1.73) and provided a Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.83). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Recfishwest</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Recfishwest advising of the proposed activity (Appendix F, reference 1.56) and provided a Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.87). 		

<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has responded to and incorporated feedback from Recfishwest on other Scarborough EPs.</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Marine Tourism Association WA</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Marine Tourism Association WA advising of the proposed activity (Appendix F, reference 1.56) and provided a Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.87). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>WA Game Fishing Association (WAGFA)</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed WAGFA advising of the proposed activity (Appendix F, reference 1.56) and provided a Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.87). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>

Titleholders and Operators	
<p>Chevron Australia / Osaka Gas Gorgon, Tokyo Gas Gorgon, JERA Gorgon</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed Chevron Australia advising of the proposed activity (Appendix F, reference 1.16) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Chevron Australia advising of the proposed activity (Appendix F, reference 1.58) and provided an updated Consultation Information Sheet. Woodside requested that Chevron forward the consultation information to Chevron's Joint Venture partners Osaka Gas Gorgon, Tokyo Gas Gorgon and JERA Gorgon for feedback. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.88). On 22 March 2023, Chevron emailed Woodside: <ul style="list-style-type: none"> Chevron advised it was actively reviewing a list of 10 of Woodside's EP submissions. Chevron advised the current forecast is for the list to be completed by mid-April at the latest, although it has prioritised a list of five EPs to be completed sooner. Chevron requested for Woodside to advise if there is a particular EP that is of higher urgency so that it can prioritise its review accordingly. Once this initial backlog is clear Chevron anticipates being in a position to respond within 30 days. Chevron requested to assist in its review of the potential effect on its interests and activities, could Woodside please provide GIS shape files for the EPs listed (including this proposed activity). On 29 March 2023, Chevron emailed Woodside: <ul style="list-style-type: none"> Chevron advised it had reviewed five of Woodside's EPs that were submitted to Chevron and have captured initial feedback on each. In addition to the previously requested GIS shape files, Chevron requested for Woodside to confirm that the area of seismic data collection and operations have not changed since the Seismic Ingress Agreements executed in 2022. On 3 April 2023, Woodside emailed Chevron: <ul style="list-style-type: none"> Woodside provided GIS shapfiles for a list of 10 Woodside EPs, including this proposed activity. Woodside advised it would respond to Chevron's feedback dated 29 March 2023 separately. On 6 April 2023, Woodside emailed Chevron: <ul style="list-style-type: none"> Woodside re-attached the GIS shapfiles provided on 3 April 2023 and advised it has provided the requested shapfiles for the Scarborough Seismic activity on 3 April 2023. Woodside confirmed that the survey area as described in the EP and associated Ingress Agreement has not changed. The Agreement will expire in Oct 2023 however Woodside are currently planning to acquire seismic under the Scarborough EP in June 2023 – it is a three-month campaign. If this timeframe cannot be achieved, Woodside will engage Chevron to renegotiate the Ingress Agreement. 	
<p>Summary of Feedback, Objection or Claim</p> <p>Chevron has requested:</p> <ul style="list-style-type: none"> GIS shapfiles for the proposed activity. Confirm that the area of seismic data collection and operations have not changed since the Seismic Ingress Agreements executed in 2022. 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided GIS shapfiles to Chevron for the Scarborough Seismic activity. Woodside confirmed that the survey area as described in the EP and associated Ingress Agreement has not changed.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>
<p>Environment Plan Controls</p> <p>Section 6.7.6 of the EP was updated to include cumulative underwater noise impact assessment, should the Chevron 4D MSS be carried out at the same time as Scarborough Trunkline installation (within the 4D MSS Operational Area). Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on Chevron's functions, interests or activities. No additional measures or controls are required.</p>	
<p>Exxon Mobil Australia</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed Exxon Mobil Australia advising of the proposed activity (Appendix F, reference 1.16) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Exxon Mobil Australia advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.89). 	
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>
<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>	
<p>Finder Energy</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Finder Energy advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 	

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
KUPEEC		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed KUPEEC advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Western Gas		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed Western Gas advising of the proposed activity (Appendix F, reference 1.16) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Western Gas advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Shell Australia		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed title holder advising of the proposed activity (Appendix F, reference 1.22) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Shell Australia advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 7 February 2023, Shell emailed advising it has no comments on the proposed activity. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
Shell advised it has no feedback on the proposed activity. Whilst feedback has been received, there were no objections or claims.	Woodside notes Shell's advice that it has no feedback on the proposed activity. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Santos		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Santos advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.89). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.

Eni Australia	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Eni Australia advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). On 23 February 2023, Eni Australia emailed Woodside advising it has no comments and that it requested to remain updated on the proposed activity. On 23 February 2023, Woodside emailed Eni Australia to advise that it will provide commencement and cessation of activity notifications relating to the proposed activities (Appendix F, reference 1.99). 	
Summary of Feedback, Objection or Claim	Environment Plan Controls
<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside notes Eni Australia's feedback that it has no comment on the proposed activity. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has consulted Eni Australia in the course of preparing this EP. Woodside has assessed the claims or objections raised by Eni Australia.</p> <p>An additional measure was put in place- Woodside will notify Eni Australia prior to the commencement and at the end of the activity, as referenced as C1.3 in this EP.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on Eni Australia's functions, interests or activities.</p>
OMV Australia / Sapura OMV Upstream (WA)	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed OMV Australia / Sapura OMV Upstream (WA) advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 23 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 	
Summary of Feedback, Objection or Claim	Environment Plan Controls
<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
JX Nippon Oil & Gas Exploration Corporation	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed JX Nippon advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside emailed JX Nippon via its website to obtain more up to date contact details for providing the EP Consultation Information (Appendix F, reference 1.94). On 23 February 2023, Woodside also sent a letter to JX Nippon advising of the proposed activity (Appendix F, reference 1.97). Woodside also sent an email advising of the proposed activity (Appendix F, reference 1.98). On 24 February 2023, JX Nippon emailed Woodside seeking confirmation of the location and topic of the activity so as to obtain the correct contact to provide feedback. On 24 February 2023, Woodside emailed JX Nippon to advise on the location of the specific proposed activity and resent the consultation information. On 24 February 2023, JX Nippon emailed Woodside and copied in the appropriate contact for reviewing the consultation information. On 28 February 2023, Woodside emailed JX Nippon to advise it has updated its stakeholder distribution list. On 10 March 2023, Woodside followed up with JX Nippon via email (Appendix F, reference 1.109). 	
Summary of Feedback, Objection or Claim	Environment Plan Controls
<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
BP Developments Australia (BP)	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed BP advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 	

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Carmarvon Energy		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Carmarvon Energy advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
PE Wheatstone (PEW)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed PEW advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Kyushu Electric Wheatstone (KEW)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed KEW advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Fugro Exploration		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Fugro Exploration advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.

INPEX Alpha		Environment Plan Controls	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed INPEX Alpha advising of the proposed activity (Appendix F, reference 1.60) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.95). 			
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls	
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.	
Peak Industry Representative bodies			
APPEA			
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed APPEA advising of the proposed activity (Appendix F, reference 1.23) and provided a Consultation Information Sheet. On 27 January 2023, Woodside emailed APPEA advising of the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 			
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls	
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.	

Traditional Custodians

Ngarluma Aboriginal Corporation (NAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 20 January 2023, Woodside emailed NAC advising of the proposed activity (Appendix F, reference 1.42) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. Woodside made it clear it was prepared to consult in the manner and location preferred by NAC and resource the meeting appropriately. Woodside requested that the information be forwarded to NAC members as required.
- On 26 January 2023, Woodside and NAC representatives met to discuss the proposed activity in more detail.
- On 3 February 2023, Woodside and NAC representatives met in Roebourne to discuss how best to consult on the proposed activity.
- On 17 February 2023, Woodside spoke with NAC representatives to discuss the proposed activity and to plan further engagement on a range of Woodside EPs. NAC representatives stated there would be opportunity at the NAC March Board meeting for further engagement.
- On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity and following on from the 17 February 2023 meeting (Appendix F, reference 1.101). Woodside noted it was seeking NAC's feedback as soon as possible on the proposed activity. Woodside made it clear it was prepared to consult in the manner and location preferred by NAC and resource the meeting appropriately.
- On 24 February 2023, NAC emailed Woodside acknowledging receipt of Woodside's emails noting that it was yet to attend to the emails and would do so following the w/c 27 February 2023.
- On 9 March 2023, Woodside emailed NAC and also left a phone message to follow up on the email received 24 February 2023. Woodside advised it was seeking opportunity for Woodside to present to the NAC board with an EP overview and asked if there had been any progress in terms of securing a preferred day and timeslot.
- On 9 March 2023, NAC emailed Woodside to advise that the contact at NAC was unavailable to meet on 30 March 2023.
- On 9 March 2023, Woodside emailed NAC:
 - Woodside noted that during a previous meeting, NAC had advised its next board meeting would be held on 29 and 30 March 2023 and that Woodside would be potentially assigned time on the agenda to present to the NAC Board on either one of those days.
 - Woodside advised that this is an important opportunity to ensure that NAC board have the opportunity to provide feedback on the Environmental Plans and note if they have interests in the environment that may be affected (EIMBA).
 - Woodside welcomed the suggestion of alternative days/times or ways that it can provide an overview to the NAC Board.
- On 14 March 2023, NAC emailed Woodside to advise that its March Board Meeting was full with overflows from January and February and at this stage will need to leave the Environmental Plan consultation until the April meeting.
- On 14 March 2023, Woodside emailed NAC to request the dates for the April board meeting and to confirm what time Woodside might be allocated to present at NAC's earliest convenience.
- On 14 March 2023, NAC emailed Woodside to advise that the Board meeting is tentatively set for 29th April 2023. NAC advised this needs to be confirmed with its Board before it can commit to a time or date.
- On 17 April, Woodside emailed NAC noting there had been no confirmation of an April meeting and seeking advice on whether NAC have feedback in relation to the proposed activities. The email explained that Woodside's plan to submit the EP and was seeking pre-submission feedback, noting that feedback could be provided for the life of the EP. Woodside sought an email supporting the approach and also looked forward to meeting in future.
- On 20 April 2023, NAC emailed Woodside acknowledging receipt of the materials and asked questions of an unrelated EP.
- On 21 April 2023, NAC advised that there was no time for Woodside on the April agenda but time would be set aside for May, with a tentative date of 17 May 2023.
- On 21 April 2023, Woodside thanked NAC for their response.
- On 26 April 2023, Woodside emailed NAC with a response to queries raised by NAC in their 20 April email. Woodside re-sent Ngarluma RTM information sheet with updated information.
- On 28 April 2023 Woodside emailed NAC advising that the next step is for the EP to be submitted but no feedback has been received to date. Stated that before Woodside submits, Woodside seeks to understand whether there are any issues or concerns with the proposed activities that need to be reflected in the EP.
- On 10 May 2023, NAC replied to Woodside stating that they are supportive of submission of the EP and look forward to ongoing consultation.
- On 12 May 2023, NAC emailed Woodside to notify that Woodside had been allocated a one-hour window in the NAC Board Meeting of 17 May.
- On 17 May 2023, Woodside presented to the NAC Board of Directors in Karratha:
 - Woodside opened the meeting with introductions
 - Woodside thanked the Ngarluma Aboriginal Corporation (NAC) for inviting Woodside Energy to speak with them and provided Acknowledgement of Country
 - Woodside talked through agenda and reasons for consultation
 - Woodside introduced the regulations we need to comply with and the role of NOPSEMA. Explained that many of our activities could impact Ngarluma country in the highly unlikely event of an oil spill, and some activities like Scarborough could have a more direct impact
 - Woodside referred to an example EMBA and described how it is comprised of many replicates of a single spill
 - Woodside explained that we are consulting with many people up and down the coastline including multiple Aboriginal Corporations
 - Woodside proposed what consultation outcomes it would like to meet with NAC, including understanding
 - How the activities could impact cultural values, functions, interests or activities
 - Whether protecting the environment is enough to protect these things
 - What NAC's concerns are about the proposed activities and what NAC thinks we should do about it
 - If there's anything NAC would like included in EPs
 - Woodside noted that feedback will be welcomed throughout the life of all Environment Plans
 - Woodside provided a high-level overview of the Scarborough project
 - NAC asked when these activities are proposed to happen, Woodside responded later this year pending government approvals
 - Woodside asked if there was any further feedback or questions about these activities, none were received
 - Woodside described the proposed seismic activity
 - Woodside described the planned and unplanned environmental impacts and risks of the activities described in the meeting and proposed controls, in accordance with the Information Sheets

<ul style="list-style-type: none"> Woodsid e asked whether there are any questions on the environmental risks and impacts, none were received Woodsid e noted that any questions or considerations can be directed through Shamine, or the Quarterly Heritage Meetings which NAC has a standing invite to. This is also an opportunity to discuss job opportunities and other matters Woodsid e left hard copies of Information Sheets and Plain Language Summaries for each discussed activity with NAC attendees. <p><u>Quarterly Heritage Meetings:</u></p> <ul style="list-style-type: none"> Woodsid e convenes a quarterly meeting of Traditional Custodian representatives from the Representative Aboriginal Corporations involved in historical native title claims over the Burrup Peninsula, including NAC. Individual attendees are nominated by their representative Aboriginal Corporations. These meetings are summarised separately in this table. NAC did not nominate attendees to quarterly meetings in 2021 or the first half of 2022 but were provided with copies of the slides used which included overviews of the Scarborough Project. 	<p>Environment Plan Controls</p> <p>Woodsid e considers the measures and controls described within this EP address the potential impact from the proposed activities on NAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>
<p>Summary of Feedback, Objection or Claim</p> <p>NAC has not provided objections or claims in response to the information provided since consultation commenced in October 2022. NAC has confirmed receipt of materials on more than one occasion, and there has been ample opportunity for two-way dialogue. As of 10 May 2023, NAC stated they support the submission of the EP and look forward to ongoing consultation.</p> <p>During face-to-face engagement with the WAC board did not provide any objections, claims or feedback on the proposed activity.</p>	<p>Woodsid e Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Consultation with NAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>No material issues or concerns related to the proposed activity were raised during consultation to date. Woodsid e invited further feedback in accordance with Woodsid e's approach to ongoing consultation (see Section 7.3.2.1).</p> <p>Woodsid e engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodsid e will apply its Management of Change and Revision process (see Section 7.6).</p>

Murujuga Aboriginal Corporation (MAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:**Historical Engagement**

- Woodside has been consulting with MAC on the Scarborough project area generally since 2018, including over the area for which this EP relates. Below is evidence of the ongoing consultation.
- 12 June 2018 - Meeting: Woodside provided a briefing on a number of projects including Scarborough.
- 11 September 2018 - Meeting: Woodside provided a briefing on Scarborough's approvals pathway, schedule and proposed engagement approach.
- 12 December 2018 - Meeting: Woodside provided a briefing on Scarborough's construction footprint and future engagement.
- On 25 August 2020, Woodside CEO and MAC Board met in person at the MAC office on Murujuga about a number of issues including high-level summary of Scarborough project. MAC members expressed a positive opinion of Woodside and a desire to work together in partnership to achieve future ambitions.
- On 2 October 2020, Woodside email MAC to request advice on progressing a Scarborough ethnographic survey, to be completed by MAC with a final report provided to Woodside
- On 5 October 2020, MAC called Woodside to discuss way forward with the proposed Scarborough ethnographic survey
- On 6 October 2020, Woodside emailed MAC to confirm arrangements and request an updated quote
- On 8 October 2020, Woodside finalised the requested scope of works for the ethnographic survey to identify heritage values known to exist in the nearshore or offshore footprints of the Scarborough project or surrounding seascape.
- From 20-22 October 2020 members of MAC's Circle of Elders participated in an on-country ethnographic survey with both male and female heritage consultants, consistent with industry standard practice. The heritage consultants were selected by MAC, who also coordinated the survey and guided the consultations. The resulting report is owned by MAC and was approved by the Circle of Elders prior to being provided to Woodside. This survey included the entire Scarborough Project development area, including the Operational Area for this EP. This survey was undertaken at a landscape level. Due to the distance of the Operational Area from onshore and coastal areas where the participants are known to hold rights and interests it was not practical to limit the scope of this assessment to a defined boundary. Additionally, in areas of open water beyond the Ancient Landscape that would have been occupied by ancestral people, the relevant values are not expected to have clearly defined or discrete distributions. Therefore, participants were provided with a map of the Scarborough development and asked to identify any values in the surrounding landscape. Consistent with the understanding that cultural values cannot be extrapolated over long distances offshore beyond any native title claims, determinations or ILUAs, no cultural values were identified in the Operational Area or EMBA (McDonald and Phillips 2021). Recommendations of the report related to onshore, nearshore islands and the Ancient Landscape outside the Operational Area of this EP.
- On 10 March 2021, Woodside provided an overview of the Scarborough project to MAC's CEO. No feedback was received on the proposed activity.
- On 19 and 20 May 2021, Woodside provided an overview of the Scarborough project to MAC's Circle of Elders. No feedback was received on the proposed activity.
- On 22 June 2021, MAC provided a report (McDonald and Phillips 2021) on the ethnographic survey to Woodside. MAC has not consented to Woodside sharing this report. It contained the following recommendations:
 - That further ethnographic survey ("Phase II") is conducted
 - That bathymetric mapping and other information is provided to MAC
 - That MAC and Woodside continue to consult on heritage management
 - That an onshore heritage site, outside the Operational Area, be registered by MAC
 - The report did not identify any sites within the Operational Area or EMBA.
- On 7 July 2021, a meeting was held with a presentation and discussion about submerged heritage assessments completed to date and mitigations proposed.
- On 11 November 2021, MAC provided Woodside a presentation/position about intangible heritage values.
- On 15 December 2021, Woodside met with MAC Board and Circle of Elders to provide a project overview.
- On 9 January 2022, Woodside sent a letter to MAC clarifying roles, composition, funding and milestones around the Heritage Management Committee.
- On 2 February 2022, Woodside proposed to MAC the establishment of a Heritage Management Committee (HMC) whose role would be to consider the necessary mitigation measures required to address any new heritage information arising following certain milestones related to the Scarborough Project and advise Woodside where any additional mitigation measures are recommended and of any other actions MAC or Woodside should consider.
- On 25 February 2022, an all day meeting was held between MAC and Woodside on heritage management and on 28 February 2022 an email of action items from meeting held on 25 February was sent to MAC.
- On 18 May 2022, Woodside sent a letter to MAC requesting clarity from MAC on whether the Phase II ethnographic survey for Scarborough is still supported by MAC.
- On 15 June 2022, Woodside held a meeting with MAC to discuss the scope, purpose and composition of the Heritage Management Committee (HMC). MAC committed to providing feedback on the HMC in writing.
- On 28 June 2022, MAC provided a letter to Woodside reaffirming their commitment to carry out the Phase II survey.
 - Woodside remains committed to supporting MAC to conduct the Phase II works at the earliest date convenient to MAC and their preferred consultant but will also respect any decision by MAC not to proceed.
- Woodside believes it has taken all reasonable steps to progress this work and is committed to support this additional ethnographic survey work to be undertaken, subject to MAC undertaking the works.
- Available bathymetric and other geophysical data is depicted in UWA 2021 and was provided to MAC on 18 May 2021 after the survey but prior to receiving McDonald and Phillips 2021.
- On 20 September 2022, Woodside sent an email to MAC seeking permission to share ethnographic survey results with NOPSEMA.
- On 9 January 2023, Woodside sent a letter to MAC regarding the proposed Heritage Management Committee.

Ensuring Sufficient Information and Sufficient Time

- On 20 January 2023, Woodside emailed MAC advising of the proposed activity (Appendix F, reference 1.44) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. Woodside also outlined:
 - In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).
 - Woodside is seeking to understand the nature of the interests that Murujuga Aboriginal Corporation (MAC) and its members may have in the 'Environment that May Be Affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet that was attached.
 - Woodside advised that it understands that it will be attending the MAC board meeting on 24 January 2023 to discuss this and information relating to a separate Woodside activity.
 - Woodside advised it would be pleased to speak with MAC members in addition to the MAC Board / office holders.
- On 25 January 2023, Woodside presented to the MAC Board on the status of the proposed Seismic activity. The meeting included the following topics relating to the proposed activity and the broader Scarborough Project:
 - EMBA map explained and left with MAC for information
 - Plain English fact sheets provided (Appendix F, reference 1.41 and 1.40)
 - MAC reiterated role of Board v Circle of Elders in consultation processes.
 - Local content outcomes continue to be a priority for MAC and its members.
- On 20 February 2023, Woodside presented to the MAC CEO and consultant to discuss the project including the Seismic EP. The meeting focused on scope and results of an ethnographic survey conducted in 2020, in context of the proposed activity and the broader Scarborough Project.
- On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity and following on from the 20 February 2023 meeting. Woodside noted it is seeking MAC's feedback as soon as possible on the proposed activity.
- On 7 March 2023, Woodside spoke with MAC to follow up on the material provided and sought meetings with the Board and Circle of Elders if required.
- On 30 March 2023, Woodside spoke with MAC and followed up on the material provided.
- On 3 April 2023, MAC emailed Woodside asking for a list of outstanding issues that Woodside would like to progress
- On 5 April 2023, Woodside responded to MAC via email with a list of open topics, which included the request for feedback on the proposed activity. Woodside requested advice from MAC on:
 - How the activity could impact cultural values
 - If MAC proposes anything to be included in the EP prior to submission
 - If MAC would like a meeting to discuss the activity
 - Whether MAC does not intend to provide advice prior to EP submission.
- On 12 April 2023, Woodside spoke with MAC regarding a number of topics including feedback on the proposed activity. MAC responded that their Board of Directors are meeting soon and that Woodside can expect a forward plan on EP consultation. Ongoing Relationship Building
- As of 15 May 2023, Woodside was still awaiting feedback from MAC.
- Woodside will continue to pursue an ongoing two-way relationship with MAC focused on future opportunities to work together.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>MAC have provided significant valuable input into the management of known and potential heritage values in the broader Scarborough Project footprint.</p> <p>As a result of consultation with MAC, three areas of concern have been raised:</p> <ul style="list-style-type: none"> This EP does not account for indirect impacts as a result of the broader Scarborough Project (e.g. potential impacts to Murujuga from onshore emissions associated with processing Scarborough gas) Uncertainty over the results of further ethnographic surveys, as new heritage values identified may require further mitigations Additionally, MAC's input has helped shape the structure and operation of the HMC described in 7.5 including their advice: <ul style="list-style-type: none"> That recommendations of the HMC need not be unanimous, That the HMC include MAC staff in addition to MAC Board, executive and Circle of Elders, and That developments in regards to the World Heritage listing of the Murujuga Cultural Landscape not trigger any meeting of the HMC. 	<p>MAC have provided significant valuable input into the management of known and potential heritage values in the broader Scarborough Project footprint.</p> <p>Woodside assessed MAC's points as follows:</p> <ul style="list-style-type: none"> The purpose of the Petroleum Activities program is to undertake a seismic survey. The Scarborough EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program, having regard to the nature and scale of the proposed Petroleum Activities Program. The extraction of Scarborough gas for onshore processing is not included in the Petroleum Activities Program for this EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of this Petroleum Activities Program but will be evaluated in future Scarborough EPs as appropriate. The completed ethnographic surveys, which align with industry practice, have not identified any heritage risks. Woodside remains committed to the further ethnographic surveys planned for the Scarborough project which go beyond industry standards, and is ready to progress these at MAC's earliest availability. The results of these surveys will be addressed through the Heritage Management Committee described in Section 7.5. <p>Woodside has agreed to the matters advised by MAC regarding the HMC with regards to the requirement for unanimous recommendations, membership of the HMC and the appropriate triggers for HMC meetings.</p> <p>Woodside will continue to consult with MAC on all relevant aspects of this EP prior to and during the execution of activities.</p> <p>Woodside continues to engage with MAC on the Scarborough project generally, and has committed to ongoing engagement with MAC Board and Elders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside recognises that whales and other species of totemic importance need to be protected, including their populations and migration patterns (Section 4.9.1.5). As assessed in Section 6, Woodside considers that when the impacts and risks to marine species, including potential totemic species, have been reduced to ALARP and an acceptable level in offshore areas, the potential impacts and risks to cultural values associated with coastal indigenous connection with, or traditional uses of marine species and associated ecosystems in nearshore coastal waters are also reduced to ALARP and an acceptable level.</p> <p>Woodside and MAC have established the HMC. Recommendations of the HMC will be implemented where they (independently or in conjunction with other actions) lower the risk of impacts to heritage to ALARP. New heritage information, where applicable to this proposed activity, will be addressed as part of ongoing consultation (Table 7.8).</p> <p>Woodside has consulted MAC in the course of preparing this EP. Woodside has assessed the claims or objections raised by MAC. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on MAC's functions, interests or activities.</p>

Wirrawandi Aboriginal Corporation (WAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 20 January 2023 Woodside emailed WAC advising of the proposed activity (Appendix F, reference 1.46) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website), as well as a summary overview fact sheet. The email requested information on the interests that WAC and its members may have within the EMBA, information on how WAC would like to engage, and requested that WAC provide information to members as required.
- On 27 January 2023 Woodside placed a phone call and emailed WAC to follow up on the information provided (Appendix F, reference 1.61).
 - Woodside noted the upcoming opportunity to meet with WAC on 21 February while it was in Karratha and would send a proposed time to meet to discuss the information Woodside has provided on a number of Woodside activities and EMBA's, including this proposed activity.
 - Woodside requested it would like to gain an understanding on best way to progress if the WAC Board wish to have further discussions in relation to this information and also on how they prefer Woodside to engage for any future information shares.
- On 24 February 2023, Woodside spoke with WAC to discuss the proposed activity and plan a consultation meeting.
- On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity and following on from the 21 February 2023 meeting (Appendix F, reference 1.102). Woodside noted it is seeking WAC's feedback as soon as possible on the proposed activity.
 - Woodside also requested confirmation of the opportunity to meet with the WAC Board when they are next due to meet in Perth in March.
 - Further details and associated costs will be discussed once the meeting has been confirmed, in discussion with Woodside.
- On 24 February 2023 WAC emailed Woodside:
 - WAC acknowledged receiving the EP information and the meeting with proposed for the Elders and Directors in March, but that the meeting is still yet to be finalised.
 - Further details and associated costs will be discussed once the meeting has been confirmed, in discussion with Woodside.
- On 7 March 2023, WAC emailed Woodside to advise a draft agenda has been set and Woodside has been allotted Thursday 23 March 2023 for presentation.
- On 7 March 2023, Woodside emailed WAC welcoming this opportunity and advised it was looking forward to receiving further information in relation to timing and location.
- On 8 March 2023, WAC agreed by phone to meet with Woodside and a full meeting of the Board and Elders on 23 March 2023 in Perth.
- On 8 March 2023, Woodside phoned WAC and agreed to proceed with the meeting.
- On 9 March 2023, Robe River Kuruma Aboriginal Corporation (RRKAC) emailed Woodside (and copied in the CEO of WAC) and advising it has discussed the proposed activity with the Robe River Kuruma Heritage Advisory Committee and they have recommended that the interests of Robe River Kuruma people are best served through the joint Heritage Advisory Committee that is required under Yaburara Marthudhunera and Kuruma Marthudhunera Indigenous Land Use Agreement.
- RRKAC also suggested that WAC is required to facilitate this Committee and noted there is an emerging need to deal with other proponent matters, so there is an opportunity to link the engagement from a meeting efficiency perspective. Since the separate meeting with WAC had already been arranged, Woodside decided to proceed with both meetings.
- On 15 March 2023, Woodside emailed WAC to follow up on details relating to the meeting of the Board and Elders on 23 March 2023 in Perth.
- On 15 March 2023, WAC emailed Woodside:
 - WAC advised the 23 March 2023 meeting has been scheduled and arranged.
 - WAC advised that as discussed previously the intention is to present to WAC Directors and Elders on information requires WAC feedback.
- Woodside has continued to engage WAC on the proposed activity and in relation to presenting at the upcoming Board and Elders meeting.
- On 16 March 2023, WAC emailed Woodside to confirm conference room booking and querying numbers for meeting of 31 March 2023.
- On 17 March 2023, Woodside emailed WAC:
 - Woodside advised it was looking forward to connect and will ensure relevant representation to provide the suite of EP information overviews and will cover the broader community activity for awareness as requested.
- On 17 March 2023, Woodside emailed WAC re Joint Heritage Advisory Group, confirming numbers at meeting from Woodside (copied to RRRKAC).
- On 23 March 2023, Woodside presented to a meeting of the WAC Board and Elders in Perth:
 - Woodside described the Environment Plan framework, referring to the Offshore Petroleum and Greenhouse Gas Storage Act (Environment) Regulations, NOPSEMA's role as regulator and general contents of Environment Plans.
 - Woodside encouraged WAC to raise anything which they feel is missing in the information provided during the meeting, or any issues or concerns.
 - Woodside displayed a map of activities open for feedback to be discussed in the meeting and provided a list of other upcoming activities which will be open for consultation in 2023.
 - Woodside provided an overview of the broader Scarborough Project and overview of activities, including the process of the seismic survey, that a vessel will send sound through the seabed which will be reflected back and measured to help understand the reservoir.
 - WAC asked a number of questions relevant to the broader Scarborough Project
 - In relation to the seismic survey, WAC asked about potential impact of noise on whale communication.
 - Woodside responded that this is a key potential impact, and that controls have been put in place to try to avoid it.
 - Woodside stated that the seismic survey will generate some impulsive noise which has been modelled and controlled
 - Woodside described planned and unplanned environmental risks and impacts in accordance with tables provided in the Information Sheets for the activities, emphasising that unplanned risks are not expected to occur and are unlikely.
 - The EMBA for each proposed Scarborough activity was displayed, and the individual worst case loss of containment scenarios identified, noting that they are all diesel fuel releases which would only be caused by vessel collisions.
 - WAC asked how the EMBA influences consultation, Woodside responded that the EMBA has always been understood but it is now being used to identify people who may have an interest in the activity
 - Woodside noted this concluded the Scarborough section of the meeting, and called for any further questions or feedback. None were received.
 - WAC stated that this kind of information sharing is important, and that Woodside's time is appreciated. WAC asked whether this type of information is broadly available to the community, Woodside responded that there are a number of open community sessions available in the region where it could be discussed

<ul style="list-style-type: none"> - WAC indicated that since they are engaging with a number of energy industry operators they will consider the information provided and discuss internally before any further response. - Woodside provided personal contact details for further feedback - Woodside provided NOPSEMA contact details, should WAC desire to provide feedback directly to the regulator. • On 3 May 2023, Woodside emailed a letter to WAC as a follow up to the 23 March meeting held in Perth with WAC Directors and Elders - Woodside thanked WAC for the careful consideration of matters - Acknowledge the WAC have interests in the EMBA - Woodside provided a response on matters raised at the meeting by WAC • On 3 May 2023, Woodside emailed a letter to WAC regarding the meeting with the joint Robe River Kuruma and Wirrawandi Joint Heritage Advisory Committee (JHAC) on 31 March: - Woodside thanked the HAC for the meeting, their careful consideration of the matters and feedback provided - Woodside acknowledged that the RRKAC have interests in the EMBA and noted that we want to ensure impacts are as minimal as reasonably practicable - A high level overview of presented topics was provided - Woodside provided responses to questions noted from the meeting that were not related to the proposed activity. Woodside notified that the feedback and the letter will be included in Environment Plans that will be submitted to NOPSEMA. <p><u>Quarterly Heritage Meetings:</u></p> <ul style="list-style-type: none"> • Woodside convenes a quarterly meeting of Traditional Custodian representatives from the Representative Aboriginal Corporations involved in historical native title claims over the Burrup Peninsula, including WAC. Individual attendees are nominated by their representative Aboriginal Corporations. These meetings are summarised separately in this table. • Copies of slides are made available to representative Aboriginal Corporations for the general awareness of members who were not able to attend individual meetings. 	<p style="text-align: center;">Environment Plan Controls</p> <p>Woodside considers the measures and controls in the EP address the potential impact from the proposed activities on WAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional measures or controls are required.</p>
<p>Summary of Feedback, Objection or Claim</p> <p>During face-to-face engagement with the WAC board and directors and circle of elders, WAC requested further information on topics related to this proposed activity which was responded to during the meeting:</p> <ul style="list-style-type: none"> • Potential impact of noise on whale communication • Emergency preparedness • The relevance of the EMBA to consultation • WAC expressed a desire for ongoing engagement and partnership. • WAC raised feedback and request for further information on the Scarborough project more broadly which will be provided as part of ongoing engagement. <p>Response</p> <p>Woodside has continued to engage WAC on the proposed activity. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>WAC as had a reasonable opportunity to participate in consultation.</p> <p>Consultation with WAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has continued to engage WAC on the proposed activity. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>WAC as had a reasonable opportunity to participate in consultation.</p> <p>Consultation with WAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>

Yinggarda Aboriginal Corporation (YAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

YMAC is the Native Title Representative Body (NTRB) for the Yamatji and Pilbara regions. NTRBs exist to provide assistance to native title claimants and holders in regards to their native title rights. No native title has been recognised over the Project Area, however YMAC is identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks.

- On 7 July 2022, Woodside met with YMAC to request advice on the appropriate cultural authorities for the Scarborough project area, including but not limited to the scope of this EP and nearby marine parks.
- Woodside described the Scarborough Project and its footprint and gave an overview of indigenous parties consulted.
- Woodside noted that YMAC was identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks. Woodside sought to understand if the cultural values of the nearby Gascoyne Marine Park may extend into the offshore Scarborough project areas.
- Woodside requested advice on how best (in addition to work completed) to identify any cultural values in the Marine Parks and in the broader project footprint.
- YMAC requested Woodside provide the relevant detailed information relating to the location and extent of the project.
- On 19 July 2022, YMAC responded to Woodside and stated the area Woodside has identified requires correspondence directed to Murujuga Aboriginal Corporation (MAC) and Ngarluma Aboriginal Corporation (NAC). No reference was made at that stage about consulting with YAC.
- On 20 January 2023 Woodside emailed YAC via the representative body Yamatji Marpa Aboriginal Corporation (YMAC) advising of the proposed activity (Appendix F, reference 1.47) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. The email requested information on the interests that YAC and its members may have within the EMBA, information on how YAC would like to engage, and requested that YAC provide information to members as required.
- On 22 January 2023 YAC/YMAC emailed Woodside to advise it would make contact with Woodside once the consultation material had been reviewed.
- On 6 February 2023, Woodside called YAC/YMAC to follow up. YAC/YMAC said they would send an email that day inviting Woodside to meet with the group.
- On 22 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity (Appendix F, reference 1.80). Woodside noted it is seeking YAC's feedback as soon as possible on the proposed activity. Woodside stated that it would be grateful to meet with YAC at the earliest convenience at location of YAC's preference, providing budget and resources.
- On 24 February 2023 Woodside followed up with YAC/YMAC via phone call. YAC/YMAC advised it would send an email on 24 February to discuss an invitation for Woodside to meet with YAC.
- On 20 March 2023, Woodside emailed YMAC to follow up the discussed invitation for a face-to-face meeting with its Board of Directors and offered a phone discussion if YAC had any questions on the activities in the meantime
- On 23 March 2023, YMAC responded and proposed a meeting on 3 May 2023 in Carnarvon and provided an estimated of its proposed costs. The invitation was accepted and arrangements made for a pre-meeting with YMAC to coordinate details.
- On 23 March 2023, Woodside emailed YAC via YMAC to confirm face to face meeting and request budget.
- On 24 March the YMAC lawyer emailed to arrange a pre-meet conversation on 31 April.
- On 24 March Woodside emailed to confirm the pre-meet conversation.
- On 27 March email from YAC via YMAX confirming pre-meet conversation.
- On 30 March, the YMAC lawyer emailed to cancel the pre-meet conversation
- On 27 April, Woodside emailed the YMAC lawyer to confirm timing and location for the face-to-face meeting on 3 May but the email bounced back requesting correspondence be forwarded to an alternate contact in YMAC
- On 27 April, Woodside forwarded the email seeking to confirm time and location for the planned meeting to the alternate contact in YMAC
- On 27 April, YMAC confirmed by email and phone call that they no longer represented Yinggarda Aboriginal Corporation and that the meeting on 3 May had been cancelled. Gumula Aboriginal Corporation is now representing YAC and YMAC is in the process of hand over, including correspondence with Woodside
- On 27 April, Woodside acknowledged YMAC email re Gumula Aboriginal Corporation transition to new service provider.
- On 28 April, Woodside attempted to call Gumula Aboriginal Corporation and left a voicemail to establish connection
- On 28 April, Woodside emailed Gumula Aboriginal Corporation to establish contact and inform them of the prior context. Woodside stated that it is still interested in meeting with the YAC board if they are interested.
- On 8 May, Woodside phoned Gumula Aboriginal Corporation to follow up the email, explaining that it is seeking to consult Yinggarda on the proposed activity and how the meeting had been cancelled. Gumula Aboriginal Corporation indicated that the email address previously contacted was correct and indicated that it would call back. No return call was received.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>In consultation in the course of preparing the EP since January 2023, YAC has not provided feedback, objections or claims in response to the information provided. YAC invited Woodside to discuss the proposed activity with its Board of Directors, which has since been cancelled due to change of support services.</p>	<p>Woodside demonstrated reasonable effort to engage in two way dialogue. YAC has had a reasonable opportunity to participate in consultation. Consultation with YAC has not identified any other groups or individuals relevant to communally held functions, activities or interests. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>As no response was provided by YAC, Woodside is not in a position to assess the merits of any objection or claim about the adverse impact of the Petroleum Activities Program or to provide a response. As identified in Section 7.9.2.1 of this EP, Woodside will continue to consult YAC following acceptance of the EP, as required by the implementation strategy and set out in Regulation 14(9) of the Environment Regulations.</p>

<p>Yindjibarndi Aboriginal Corporation</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 20 January 2023, Woodside emailed Yindjibarndi advising of the proposed activity (Appendix F, reference 1.48) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website), as well as a summary overview fact sheet. The email requested information on the interests that Yindjibarndi and its members may have within the EMBA, information on how Yindjibarndi would like to engage, and requested that Yindjibarndi provide information to members as required. On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity (Appendix F, reference 1.103). On 26 February 2023, Yindjibarndi emailed Woodside. Yindjibarndi advised that it will not be providing any comment on the proposed activity and noted it respected the traditional owners whose land and sea lies adjacent to, and within the precinct of, the projects, and will leave any comment and advice to be provided by them. On 28 February 2023, Woodside emailed Yindjibarndi to thank them and noted the response. 		
<p>Summary of Feedback, Objection or Claim</p> <p>Yindjibarndi has provided a response and advised that it will not be providing any comment on the proposed activity. Yindjibarndi expressed that they would prefer that traditional owner groups with land and sea adjacent to and within the precinct of the projects provide comment.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Yindjibarndi Aboriginal Corporation has informed Woodside that it does not intend to provide feedback. Woodside agrees with Yindjibarndi's position that traditional owners whose land and sea are adjacent to or within the precinct of the projects should be able to provide comment. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on YAC's functions, interests or activities. Based on the engagement to date, no additional controls have been identified.</p>

Buurabalayji Thalanyji Aboriginal Corporation (BTAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:**Historical Engagement**

- Prior to sending out the Consultation Information Sheets, Woodside spoke to BTAC on 4 January 2023 to discuss the best way forward to consult with BTAC. On 10 January 2023, Woodside emailed BTAC stating it would be very grateful for the opportunity to meet with BTAC in the second half of February as discussed, or sooner if possible. Woodside also offered to cover the reasonable costs of consultations. Specifically, in relation to this EP, Woodside stated they would like to discuss:
 - BTAC's expectations for consultation - how can Woodside and BTAC best work together.
 - BTAC's aspirations and plans - how can Woodside support BTAC regarding potential employment and contracting opportunities.
 - Environmental planning consultations about Woodside's Scarborough Project with gas fields planned to be located offshore, approximately 380km northwest of Karratha.
 - In addition:
 - Woodside advised it would like to and is required to consult with BTAC about the nature of any interests BTAC have in the "environment that may be affected" (EMBA) by this work, and any concerns BTAC may have about potential environmental impacts, so these concerns can be addressed through the environmental planning and approvals process.
 - Woodside provided further information about government guidelines for these consultations and provided a link to <https://consultation.norsema.gov.au/environment-division/consultation-guideline/>.
 - Woodside advised it would reach out in the next week with consultation information sheets.
 - Woodside stated in the 10 January 2023 email that it would like to arrange a meeting between senior Woodside staff and BTAC's Board if BTAC felt that was appropriate and it would await guidance from BTAC.

Ensuring Sufficient Information and Sufficient Time

- On 20 January 2023, Woodside emailed BTAC advising of the proposed activity (Appendix F, reference 1.50) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. The email requested information on the interests that BTAC and its members may have within the EMBA, information on how BTAC would like to engage, and requested that BTAC provide information to members as required.
- On 23 January 2023, Woodside emailed BTAC with the consultation information noting it had previously sent an email to an incorrect email address (Appendix F, reference 1.51).
- On 24 January 2023, BTAC emailed Woodside acknowledging it had received the information.
- On 27 January 2023, Woodside placed a phone call and emailed BTAC to follow up on the information provided (Appendix F, reference 1.62 and 1.63).
- On 20 February 2023, BTAC provided a letter to Woodside in relation to consultation on the broader Scarborough activities, including this proposed activity:
 - BTAC referred to the advertisements placed by Woodside regarding the proposed activity which sought feedback from persons or organisations who may hold interests in the EMBA by the activities.
 - BTAC confirmed that BTAC on behalf of Thalanyji people has interests and that the Thalanyji people have an enduring deep connection to sea country
 - BTAC advised it was seeking the opportunity to engage with Woodside and NORSEMA on the activity.
 - BTAC advised it seeks support from Woodside to enable BTAC to define and articulate its values on Sea Country in a manner that could be more clearly understood by the offshore sector, government, and the community. This would enable BTAC and Woodside to collaborate to develop effective management plans that can provide adequate protection to sea country values.
 - BTAC advised the information in the consultation fact sheets is very general. BTAC seeks support from Woodside to obtain technical support to review the information and provide BTAC and its members with feedback on the project risks to Sea Country and help BTAC contemplate the potential management controls that could be developed to protect its values and interests.
 - BTAC requested that emergency response capability is developed and locally provided to be able to respond to potential activities/actions that may cause an impact in the EMBA. BTAC encouraged Woodside and industry to build capacity and capability in BTAC's ranger program so that it could participate in response planning and management activities.
 - BTAC noted that ongoing consultation with BTAC will be imperative and likely continuous given recent changes to consultation requirements and this will continue to be a burden on the organisation. BTAC requested that Woodside enter into a consultation or engagement framework to ensure BTAC can be properly resourced financially and intellectually to participate in the consultation and management planning processes for the activities.
- On 22 February 2023, Woodside emailed BTAC:
 - Woodside thanked BTAC for its 20 February 2023 correspondence regarding consultations about the Scarborough project.
 - Woodside advised it will respond to this correspondence in the coming days and would be most grateful for the opportunity to meet with BTAC to discuss the matters raised in its letter and Woodside's relationship more broadly.
- On 13 March 2023, Woodside contacted BTAC via phone to discuss the correspondence on 20 February 2023.
- On 17 March 2023, Woodside emailed a letter to BTAC:
 - Woodside thanked BTAC for its feedback and it looks forward to working with BTAC.
 - Woodside advised it acknowledges and respects that BTAC on behalf of the Thalanyji People (Thalanyji) has interests in the EMBA by the Scarborough Activities and wants to ensure these values and interests are protected.
 - Woodside advised it also acknowledges that through BTAC's correspondence, BTAC has proposed several important risk mitigation and management measures.
 - Woodside agreed that the principles BTAC have outlined are important. To paraphrase, these principles are that:
 - Woodside and BTAC work in a structured way and on an ongoing basis to learn about, articulate and understand each other's values, aspirations and work, particularly to ensure BTAC understands how Woodside's activities may impact on Thalanyji values and interests.
 - Arising from this consultation, Woodside and BTAC will continue to identify environmental risks and design and implement monitoring and management responses to these risks on an ongoing basis. This includes building on Woodside's knowledge base to understand Thalanyji values and interests. Woodside understands this work will also improve BTAC's capability and capacity to identify risks and address monitoring and management arrangements, including through BTAC's ranger program.
 - BTAC has requested that Woodside provides BTAC with the resources that are necessary to undertake this work, including through the provision of information and Woodside personnel to provide briefings, and independent expert anthropological and environmental management advice to BTAC.

- Woodside advised that in response to the provision of independent expert environmental management advice to BTAC, Woodside would be pleased to provide the resources necessary for BTAC to obtain and retain this advice on the basis that such advice is provided by an experienced and reputable oil and gas environmental management expert who is independent of Woodside, and who has the capacity to undertake this work to meet consultation schedules.
 - Woodside suggested a range of organisations for BTAC's consideration who are not working for Woodside.
 - Woodside also advised it would also be pleased to support BTAC to acquire anthropological advice.
 - Woodside advised that it respects that BTAC has assessed the likelihood of unplanned events and impacts as possible, Woodside has assessed the likelihood of a major unplanned hydrocarbon release event as highly unlikely. By way of example the Scarborough Activities EMBA's are premised on an unmitigated diesel spill arising from the collision of large vessels, the piercing of fuel tank(s) from that collision causing all the fuel tank to leak out, and no control measures being enacted. Woodside has been operating for over 35 years and has never caused an unplanned event like this, however Woodside must plan for and consult about such events
 - Woodside advised that Woodside's target is to ship the first cargo of LNG from the Scarborough project in 2026, and to enable that:
 - Drilling and completions work is planned to occur anytime within a five-year window commencing in the second half of 2023, pending approvals.
 - Seabed installation and trunkline installation activities in Commonwealth waters are expected to commence in around late 2023, pending approvals.
 - Subsea infrastructure installation activities are planned to commence in the second half of 2023, pending approvals, with activities occurring in multiple campaigns and estimated to be completed within about 18 months.
 - Seismic activities are planned to start in the first half of 2023, pending approvals, and will take place over a period of between 55 and 70 days.
 - Links to relevant consultation information sheets to the above activities were also provided to BTAC for the second time (first sent on 23 January).
 - Woodside noted that considering the above schedule, there is time for BTAC and Woodside to work together in the short, medium and longer term to identify, develop and refine management responses to environmental risk.
 - Woodside advised that with reference to the timeframes as described above, environmental protection and management associated with these activities is subject to an adaptive management approach. This means that consultation between Woodside and BTAC about environmental risk and management responses is ongoing, and changes can be made to improve environmental protection and management practices over time, including in the associated Environment Plans (EPs). Woodside proposed the following next steps:
 - Woodside formalises the matters outlined in its correspondence by including in each of the Environment Plans statements along the following lines:
 - BTAC for and on behalf of Thalanjiji has interests and values in the EMBA's and is concerned about the possible impact on these interests and values, including to Sea Country, arising from Woodside's proposed activities.
 - BTAC, with support from Woodside and through the provision of independent expertise, will on an ongoing basis:
 - convey to Woodside the nature of Thalanjiji interests and values, noting that BTAC would like to conduct work to articulate those values in a manner that Woodside understands.
 - provide information to Woodside about how those interests and values intersect with the EMBA's and how that should be managed.
 - Woodside will engage in ongoing consultation with BTAC for the purposes of ongoing monitoring, management and emergency response associated with environmental risk.
 - Woodside and BTAC will work under an adaptive management approach as the understanding of each other's values and interests, activities, needs and aspirations grow during the course of ongoing consultation. This means that Woodside's Environment Plans may be updated from time to time so they accurately reflect environmental risk as they relate to BTAC's interests and values, and the management measures that Woodside and BTAC will put in place to avoid and otherwise mitigate and manage environmental risk.
 - BTAC can at any time can make direct representations to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) about the nature of BTAC's interests and how they may be affected by Woodside's activities.
 - Woodside proposed if BTAC considers it appropriate, that the principles discussed in its correspondence (this 17 March 2023 letter and BTAC's correspondence of 20 February 2023) apply to the various decommissioning and drilling EPs that Woodside has notified BTAC about. This will ensure these arrangements are formalised into regulatory processes and documentation. As per Woodside's ongoing consultation approach, feedback continues to be assessed through the life of the EPs.
 - Woodside advised BTAC that its letter of 20 February 2023 and this response will be included in the EP. Woodside requested that if their feedback is sensitive, please inform Woodside, and it will make this known to NOPSEMA upon submission of the Environment Plans to ensure this information remains confidential to NOPSEMA.
 - On 30 March 2023, Woodside spoke with BTAC to follow up on correspondence described above. BTAC indicated that they desire a consultation agreement and intend to provide correspondence accordingly.
 - On 17 April 2023, Woodside spoke with BTAC by telephone. The BTAC representative stated that they were aware that there were archaeological sites identified on nearshore islands and a cultural obligation to care for the environmental values of sea country. The BTAC representative stated there was in principle agreement to submission of current EPs while continuing to negotiate the collaboration agreement for support for rangers and support for recording of cultural values.
 - On 18 April 2023, BTAC emailed a response regarding Woodside's Scarborough activities.
 - BTAC agreed that subject to formalising arrangements, BTAC agrees in principle for Woodside to include the statements described in our letter dated 17 March
 - BTAC proposed that a Collaboration Agreement would be an appropriate mechanism to provide ongoing feedback to Woodside regarding its activities
 - BTAC invited Woodside to a board meeting to discuss Scarborough activities and other short, medium and longer term activities, discuss BTAC's strategic plan and details of a collaboration agreement
 - On 19 April, Woodside emailed to accept an invitation from BTAC to attend their forthcoming board meeting and requesting half a day of the board's time, preferably before the first week of May.
 - On 28 April 2023, Woodside emailed BTAC to follow up in relation to BTAC's proposed collaboration agreement and confirmed Woodside's intention to submit this EP on the understanding that BTAC is agreeable to this course of action, on the basis that we will progress the collaboration agreement. Woodside asked BTAC to identify if it had misinterpreted BTAC's position.
 - On 4 May 2023, Woodside called BTAC. It was discussed that:
 - Woodside would be sending BTAC more EPs (for other activities) for consultation
 - Woodside is working on draft key terms/principles for the collaboration agreement for BTAC's consideration
 - A meeting between Woodside and the BTAC board may be possible in June
 - Woodside intended to submit the Scarborough EPs (including this proposed activity) soon
 - On 4 May 2023, BTAC emailed Woodside to continue discussion regarding a potential future meeting between Woodside and the BTAC board to discuss activities on Thalanjiji Country, activities for which BTAC's ongoing consultation is sought, the collaboration agreement and other items not related to this proposed activity.
- On-going Relationship Building.**
- Woodside will continue to pursue an ongoing two-way relationship with BTAC including the development of a Collaboration Agreement focused on future opportunities to work together and working towards a meeting with the BTAC board.

<p>Summary of Feedback, Objection or Claim</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p>	<p>Environment Plan Controls</p>
<p>Woodside commenced consultation with BTAC on 4 January 2023.</p> <p>Through consultation relevant to the activity, BTAC has:</p> <ul style="list-style-type: none"> • Stated that their interests include archaeological sites identified on nearshore islands • State a cultural obligation to care for the environmental values of sea country. • Requested Woodside supports BTAC in obtaining technical advice relating to the proposed activity which was sent to BTAC. • Expressed desire to be involved in local emergency response capability <p>Woodside has responded to these items accordingly and engaged in a two-way dialogue with BTAC about working together in the future.</p>	<p>Woodside has been in a two-way dialogue with BTAC since 4 January 2023. Consultation with BTAC has not identified any other groups or individuals relevant to communally held functions, activities or interests</p> <p>No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing two-way consultation (see Section 5 and Section 7.9.2.1). This will be facilitated via the Collaboration Agreement that Woodside and BTAC are committed to working towards.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on BTAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>

Robe River Kuruma Aboriginal Corporation (RRKAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 20 January 2023, Woodside emailed RRKAC advising of the proposed activity (Appendix F, reference 1.49) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. The email requested information on the interests that RRKAC and its members may have within the EMBA, information on how RRKAC would like to engage, and requested that RRKAC provide information to members as required.
- On 31 January 2023, Woodside held a discussion with RRKAC representative to discuss the proposed activity and ways forward for consultation.
- RRKAC advised during the virtual meeting that the activity would need to be considered by their Heritage Advisory Committee scheduled for late February 2023.
- On 24 February 2023, Woodside emailed RRKAC to follow up on the information provided (Appendix F, reference 1.104) and the proposed February 2023 meeting. Woodside noted it is seeking RRKAC's feedback as soon as possible on the proposed activity.
- On 9 March 2023, RRKAC emailed Woodside (and copied in CEO of Wirrawandi Aboriginal Corporation (WAC)); RRKAC advised it has discussed the proposed activity with the Robe River Kuruma Heritage Advisory Committee and they have recommended that the interests of Robe River Kuruma people are best served through the joint Heritage Advisory Committee that is required under Yaburara Mardudhunera and Kuruma Marthudhunera Indigenous Land Use Agreement.
- RRKAC also suggested that WAC is required to facilitate this Committee and noted there is an emerging need to deal with other proponent matters, so there is an opportunity to link the engagement from a meeting efficiency perspective.
- Between 15-17 March 2023, Woodside exchanged email correspondence with RRKAC (and WAC) and in relation to establishing a meeting with the joint Heritage Advisory Committee. The meeting was confirmed for 31 March 2023.
 - On 15 March 2023, Woodside emailed RRKAC to ask when date of joint HAC would occur and how Woodside can support it.
 - On 15 March 2023, RRKAC emailed Woodside regarding contacts for the proposed meeting.
 - On 15 March 2023, Woodside emailed RRKAC to advise who from Woodside would lead the process.
 - On 15 March 2023, RRKAC emailed Woodside to advise the joint HAC meeting was scheduled tentatively for 31 March 2023 but that this would depend on WAC's availability but that the RRKAC representatives are able to attend.
- On 31 March 2023, Woodside met with the Robe River Kuruma and Wirrawandi Joint Heritage Advisory Committee (HAC) in Karratha. Woodside described the Environment Plan framework, referring to the Offshore Petroleum and Greenhouse Gas Storage Act (Environment) Regulations, NOPSEMA's role as regulator and general contents of Environment Plans. Woodside encouraged HAC to raise anything which they feel is missing in the information provided during the meeting, or any issues or concerns.
 - Woodside displayed a map of activities open for feedback to be discussed in the meeting and provided a list of other upcoming activities which will be open for consultation in 2023.
 - Woodside provided an overview of the broader Scarborough Project and overview of activities.
 - HAC asked a number of questions related to the broader Scarborough project
 - Woodside described the proposed seismic activity
 - Woodside showed a video example of a seismic survey
 - Woodside described planned and unplanned environmental risks and impacts in accordance with tables provided in the Information Sheets for the activities, emphasising that unplanned risks are not expected to occur and are unlikely.
 - The EMBA for each proposed Scarborough activity was displayed, and the individual worst case loss of containment scenarios identified, noting that they are all diesel fuel releases which would only be caused by vessel collisions.
 - HAC asked what response Woodside would implement for a diesel spill. Woodside responded that response arrangements are checked by NOPSEMA and since diesel rapidly evaporates and disperses response is mainly monitoring
 - Woodside noted this concluded the Scarborough section of the meeting, and called for any further questions or feedback. None were received.
 - Woodside provided personal contact details for further feedback
 - Woodside provided NOPSEMA contact details, should the HAC desire to provide feedback directly to the regulator.
- On 3 May 2023, Woodside contacted RRKAC by mail to summarise the information presented at the meeting on 31 March 2023 and the actions for Woodside to follow up:
 - Woodside thanked the HAC for the meeting, their careful consideration of the matters and feedback provided.
 - Woodside acknowledged that the RRKAC have interests in the EMBA and noted that we want to ensure impacts are as minimal as reasonably practicable.
 - A high level overview of presented topics was provided.
 - Woodside provided responses to questions noted from the meeting that were not related to the proposed activity.
 - Woodside notified that the feedback and the letter will be included in Environment Plans that will be submitted to NOPSEMA.
 - Woodside provided responses to questions noted from the meeting that were not related to the proposed activity.
 - Woodside notified that the feedback and the letter will be included in Environment Plans that will be submitted to NOPSEMA.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>During face-to-face engagement, the RRRKAC HAC requested further information on topics related to this proposed activity which was responded to during the meeting:</p> <ul style="list-style-type: none"> • Spill response arrangements • The HAC expressed a desire for ongoing engagement and partnership. <p>The HAC raised feedback and request for further information on the Scarborough project more broadly which will be provided as part of ongoing engagement.</p>	<p>Woodside continues to engage RRRKAC in relation to the proposed activity. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>RRKAC has had a reasonable opportunity to participate in consultation</p> <p>Consultation with RRRKAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on RRRKAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>

Nganhurra Thanardi Garrbu Aboriginal Corporation (NTGAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- YMAC is the Native Title Representative Body (NTRB) for the Yamatji and Pilbara regions. NTRBs exist to provide assistance to native title claimants and holders in regards to their native title rights. No native title has been recognised over the Project Area, however YMAC is identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks.
- On 7 July 2022, Woodside met with YMAC to request advice on the appropriate cultural authorities for the Scarborough project area, including but not limited to the scope of this EP and nearby marine parks.
 - On 6 January 2023, Woodside phoned NTGAC via the representative body Yamatji Maripaa Aboriginal Corporation (YMAC) for the purpose of introduction and to explain that Woodside will be sending information concerning EPs.
 - On 20 January 2023, Woodside emailed NTGAC via the representative body YMAC advising of the proposed activity (Appendix F, reference 1.43) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet.
 - On 27 January 2023 Woodside phoned and emailed NTGAC/YMAC to follow up on the information provided (Appendix F, reference 1.45). Woodside requested if NTGAC required anything further ahead of a planned meeting with Woodside on 16 February 2023.
 - On 1 February 2023, NTGAC/YMAC phoned Woodside to confirm the planned meeting for 16 February 2023. It was arranged to hold a subsequent phone discussion between key representatives on 10 February to discuss scope for the consultation meeting. Woodside said that it is anticipating feedback from the group on the proposed activity at this consultation meeting and asked for any specific families or individuals that Woodside should be engaging with to be invited. NTGAC/YMAC responded that consultation with NTGAC as the representative body is appropriate.
 - On 10 February 2023, Woodside phoned NTGAC and described the proposed scope of the consultation meeting planned for 16 February.
 - On 16 February 2023, Woodside presented to a meeting of the NTGAC/YMAC Board:
 - Woodside described the Environment Plan framework, referring to the Offshore Petroleum and Greenhouse Gas Storage Act (Environment) Regulations, NOPSEMA's role as regulator and general contents of Environment Plans.
 - Woodside encouraged NTGAC to raise anything which they feel is missing in the information provided during the meeting.
 - Woodside displayed a map of activities open for feedback to be discussed in the meeting and provided a list of other upcoming activities which will be open for consultation in 2023.
 - Woodside provided an overview of the broader Scarborough Project and overview of activities.
 - Woodside described the proposed seismic survey, noting that the purpose is to understand the gas reservoirs below the seabed.
 - Woodside provided an overview of the proposed activity and a summary of both planned and unplanned impacts and associated controls.
 - Woodside described planned and unplanned environmental risks and impacts in accordance with tables provided in the Information Sheets for the activities, emphasising that unplanned risks are not expected to occur and are unlikely.
 - NTGAC asked if Woodside could explain impacts on whales from noise.
 - Woodside replied that there has been modelling work done and applied to understanding of thresholds for hearing and behavioural impacts. It shows that there will be no lasting effect on whales, however there could be short term hearing impacts. Measures have been taken like removing driven piling from the activities to reduce noise impacts
 - Woodside further explained that there are not expected to be many turtles, dugongs or humpbacks offshore but there could be pygmy blue whales
 - YMAC asked how Woodside will monitor for whales
 - Woodside explained that it will have dedicated marine fauna observers and systems which can listen for whale song on some vessels. Presence of whales can postpone activities. Woodside noted that noise impacts are time bound and that whale tagging and behaviour monitoring shows they are migrating and unlikely to stay around for hours, reducing the likelihood of impact from noise
 - The EMBA for each proposed Scarborough activity was displayed, and the individual worst case loss of containment scenarios identified, noting that they are all diesel fuel releases which would only be caused by vessel collisions.
 - Woodside noted this concluded the Scarborough section of the meeting, and called for any further questions or feedback. None were received.
 - Woodside stated that there is significant work and consultation coming up, and it hope to spend more time with NTGAC to understand expectations and desire of how Woodside can work with NTGAC
 - YMAC expressed that they are being inundated with requests for consultation from oil and gas operators, and are working internally on processes and priorities for consultation
 - Woodside welcomed the transparency and discussion on capacity
 - NTGAC expressed that consulting on these type of activities is not viewed as wasting time, but consultation which gives nothing back to the community is not a priority. They are interesting in partnership programs and on-country engagements.
 - Woodside stated that while all the big companies will have deadlines and need to get feedback to meet legal requirements, Woodside desires it to be a jointly held process and that NTGAC desires any support or assistance please request it.
 - Woodside provided personal contact details for further feedback
 - Woodside provided NOPSEMA contact details, should NTGAC desire to provide feedback directly to the regulator.
 - On 21 February 2023, NTGAC/YMAC emailed Woodside to seek clarification of the attendee names at the 16 February 2023 Board meeting.
 - On 21 February 2023, Woodside emailed NTGAC/YMAC the attendee names at the 16 February 2023 Board meeting and provided a copy of the presentation pack. Woodside followed up on request for any further feedback on the proposed activity.
 - On 22 February 2023 NTGAC/YMAC emailed Woodside to thank Woodside for sending the relevant information.
 - On 22 March 2023, Woodside followed up by phone with NTGAC/YMAC on any feedback on the proposed activities.
 - On 28 March 2023, YMAC followed up with Woodside on a Woodside action arising from the 16 February meeting to supply photos and diagrams in relation to the different activity.
 - On 31 March 2023, Woodside followed up with the relevant photos and diagrams, noting contact details and welcoming any further feedback. Woodside thanked NTGAC for their work to date and requested that NTGAC reach out for any assistance.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>During face-to-face engagement, the NTGAC requested further information on topics related to this proposed activity which was responded to during the meeting:</p> <ul style="list-style-type: none"> • Potential impacts of noise on whales • Whale monitoring arrangements <p>The NTGAC expressed a desire for ongoing engagement and partnership.</p>	<p>Woodside continues to engage NTGAC via YMAC in relation to feedback following the 16 February 2023 Board meeting.</p> <p>No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>NTGAC has had a reasonable opportunity to participate in consultation.</p> <p>Consultation with NTGAC has not identified any other groups or individuals relevant to communally held functions, activities or interests</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on NTGAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>
Native Title Representative Bodies		
Yamatji Marlpa Aboriginal Corporation (YMAC)		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <p>Historical Engagement</p> <ul style="list-style-type: none"> • On 7 July 2022, Woodside met with YMAC to request advice on the appropriate cultural authorities for the Scarborough project area, including but not limited to the scope of this EP and nearby marine parks. • Woodside described the Scarborough Project and its footprint, and gave an overview of indigenous parties consulted. • Woodside noted that YMAC was identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks. Woodside sought to understand if the cultural values of the nearby Gascoyne Marine Park may extend into the offshore Scarborough project areas. • Woodside requested advice on how best (in addition to work completed) to identify any cultural values in the Marine Parks and in the broader project footprint. • YMAC requested Woodside provide the relevant detailed information relating to the location and extent of the project. <p>Ensuring Sufficient Information and Sufficient Time</p> <ul style="list-style-type: none"> • On 8 July 2022, Woodside emailed YMAC providing the requested information including a link to the factsheet relevant to this EP. • Woodside advised it would like to establish a process to cross check its understanding of cultural and spiritual values associated with proposed offshore development and surrounding areas. We note that YMAC has been listed as the Native Title Representative body in the North West Marine Parks Network Management Plan for nearby Australian Marine Parks, and would therefore like to confirm cultural values of these marine parks don't extend into Woodside's areas of interest. • Woodside provided an extract from a related Scarborough EP which detailed further context and Woodside's current understanding of cultural and spiritual values associated with proposed offshore development and surrounding areas. • On 19 July 2022, YMAC responded to Woodside: • YMAC stated the area Woodside has identified requires correspondence directed to Murujuga Aboriginal Corporation and Ngarluma Aboriginal Corporation. • The extent to which each corporation has interests specifically over the area of this EP was not advised, but both have been involved in assessments of cultural values as detailed below. YMAC does not act for either corporation. • On 13 March 2023, Woodside emailed YMAC as to whether YMAC considers itself a 'relevant person' under sub regulation 11 A (1) of the Environment Regulations for the purposes of consultation on EPs and, if so, whether that relevance is limited to a facilitation function in its capacity as a representative of Traditional Owner groups/corporations that overlap or adjacent to the environment that may be affected (EMBA) of a particular activity. • On 20 March 2023, YMAC replied to confirm that in its view it is a 'relevant person' under sub regulation 11 A (1) of the Environment Regulations for the purposes of consultation on EPs only in relation to its facilitation and coordination function as a Native Title Representative Body under applicable federal legislation. YMAC does not intend to provide substantive comment on the content of EPs. • On 20 March 2023, Woodside emailed YMAC to thank it for its reply and to advise that that this assessment would be included in Woodside's EPs. • On 20 March 2023, YMAC emailed Woodside confirming that it is appropriate to use the assessment in the EPs. 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>YMAC has advised that the most appropriate stakeholders for the Scarborough project generally are Murujuga Aboriginal Corporation and Ngarrluma Aboriginal Corporation who are not represented by YMAC. YMAC has provided feedback that in its view it is a 'relevant person' under sub regulation 11 A (1) of the Environment Regulations for the purposes of consultation on EPs only in relation to its facilitation and coordination function as a Native Title Representative Body under applicable federal legislation, and does not intend to provide substantive comment on the content of EPs.</p>	<p>YMAC is the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia. As such, they are not a Prescribed or Registered Native Title Body Corporate representing the cultural rights of a Traditional Custodian Community but exist to assist native title claimants and holders. YMAC is identified in the North-west Marine Parks Network Management Plan 2018 (DNP, 2018) as the Native Title Representative Body, noting no marine parks overlap the Operational Area. Woodside has approached YMAC to confirm the best approach to confirm additional cultural values (if any) within the Operational Area. Woodside has consulted with YMAC in relation to its facilitation and coordination function as a Native Title Representative Body under applicable federal legislation, and it has responded that it does not intend to provide substantive comment on the content of EPs. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (refer to Section 7.6).</p>	<p>As YMAC has indicated that it does not intend to provide substantive comment on the content of EPs, no further controls are required.</p>
Local government and community representative groups or organisations		
<p>Karratha Community Liaison Group (KCLG)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 21 September 2022, Woodside presented to the KCLG and provided consultation information on related petroleum activities for the Scarborough Project, which included reference to the proposed activities for this EP. On 27 January 2023, Woodside emailed the KCLG advising of the proposed activity and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F Appendix F, reference 1.91). On 24 February 2023, the Pilbara Port Authority responded and noted that as the activity occurs outside of the Port waters it has no comments. 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback was received from the KCLG with the exception of the Pilbara Port Authority, which advised it had no comments on the proposed activity. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside notes that no feedback was received from the KCLG with the exception of the Pilbara Port Authority, which advised it had no comments on the proposed activities. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
Exmouth Community Reference Group (ECRG)		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 7 April 2022, Woodside presented to the ECRG and provided consultation information on related petroleum activities for the Scarborough Project, which included reference to the proposed activities for this EP. On 17 November 2022, Woodside presented an updated on its planned Scarborough activities which included a slide on the proposed Seismic activity (Appendix F, reference 1.38). On 1 February 2023, Woodside emailed the ECRG advising of the proposed activity (Appendix F, reference 1.64) and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.93). On 3 March 2023, an Exmouth CRG representative emailed Woodside: <ul style="list-style-type: none"> Provided comment on the proposed activity and requested information on the timeline for the activity and could it be for a continual period up to 70 days or intervals. On 17 March 2023, Woodside emailed the ECRG representative: <ul style="list-style-type: none"> Advised that the planned duration for the survey is 80 days. The planned duration includes a maximum of 70 days of seismic data acquisition, plus 10 days of contingency for potential vessel or equipment down time and adverse weather conditions. The exact survey duration is dependent upon the final 4D activity scope. The activity is planned to commence in Q2 or Q3 2023 with the earliest potential commencement date for the survey being upon EP acceptance. The survey is planned to be continuous but may have intermittent periods to account for adverse weather conditions or potential vessel or equipment down time. 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>An Exmouth CRG representative queried about the timeline for the activity. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside has provided relevant information to address the ECRG representative's questions. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
Other non-government groups or organisations		
Conservation Council of WA (CCWA)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> • On 12 August 2021, CCWA emailed Woodside about the broader Scarborough Offshore Gas Project and upcoming draft Environmental Plans, and stating it wishes to be consulted as a relevant person. • On 20 August 2021, Woodside emailed CCWA advising of the proposed activity and provided a Consultation Information Sheet. • On 14 September 2021, CCWA emailed Woodside requesting: <ul style="list-style-type: none"> - Additional time to provide feedback - A copy of the draft EP's and other application documents including studies that will be submitted to the regulator in support of the EP's. • On 17 September 2021, Woodside responded to CCWA's feedback. • On 15 December 2021, Woodside received third-party correspondence via NOPSEMA in relation to a related Scarborough activity. Following assessment of the feedback, Woodside determined that the feedback from CCWA on 27 October 2021 had included the following feedback, claims and objections that could also be related to the proposed activity the subject of this EP. The feedback also included a number of additional third-party supporting documents: <ul style="list-style-type: none"> - CCWA asserted that impacts on the Dampier Archipelago National Heritage Place, from the development of the Scarborough gas field, need to be assessed in EP's for the Scarborough Project. - CCWA asserted its previous request for information on direct and indirect impact on the Murujuga Petroglyphs as it had not been met. - CCWA claimed that Woodside's consultation process has been restricted and consultation with a wider group of 'relevant' persons is required (particularly Indigenous groups (i.e., MAC) but also trade union groups, youth groups, health sector groups and government agencies). • On 25 February 2022, Woodside responded to CCWA and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate (Appendix F, reference 1.29). • Woodside advised the purpose of the PAP is the appraisal of the offshore Scarborough gas fields to help inform the optimised management of the hydrocarbon reserves. <ul style="list-style-type: none"> ▪ The EP assesses both direct and indirect environmental impact risks associated with the PAP, having regard to the nature and scale of the PAP. ▪ The extraction of Scarborough gas for onshore processing is not included in the PAP for this EP. • Therefore, the impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP but will be evaluated in Scarborough EPs as appropriate. No changes have been made to the EP. • Woodside confirmed that consultation requirements set out in Reg 11A of the Environment Regulations have been complied with in relation to the consultation process for this EP. • Section 5 has been updated to clarify Woodside's consultation process, in line with the requirements of sub regulation 11A (1) of the Environment Regulations to identify relevant persons for the purposes of consultation on its EPs. Woodside provided criteria for the identification of relevant persons. • Woodside confirmed that for the broader Scarborough project, it has engaged closely with relevant stakeholders (including MAC and other relevant Traditional Owner groups) since 2018. This includes consultation on relevant Scarborough activities in Commonwealth waters during development of the Scarborough Offshore Project Proposal, and activities in State waters as part of the Scarborough Project Nearshore Component environmental review. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>CCWA provided feedback via NOPSEMA relating to:</p> <ul style="list-style-type: none"> • Impacts on the Dampier Archipelago National Heritage Place • Consultation requirements under the Regulations <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Where an amendment has been made to the EP in relation to any of the claims or objections raised, a reference to the updated Section of the EP is shown in the relevant responses contained in Appendix F.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>

Greenpeace Australia Pacific (GAP)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 8 April 2022 during the course of preparing this EP, GAP self-identified and requested to be consulted on this and other Woodside EPs. GAP also made requests for additional information relating to the proposed activity.
- On 29 April 2022, Woodside responded to GAP's feedback..
- On 1 June 2022, Woodside met with GAP representatives to discuss Woodside's broader business, including the Scarborough development.
- On 15 June 2022, Woodside emailed GAP (Appendix F, reference 1.33):
 - Woodside advised it has further reviewed GAP's letter from 8 April 2022 and considers that GAP is a relevant person under Regulation 11A of the OPGGS Regulations, for the purposes of consultation on this EP.
 - Woodside attached a detailed statement of response to GAP's request for additional information.
- On 29 June 2022, GAP emailed Woodside (NOSEMA and NOPTA CC) and provided a letter containing feedback on the proposed activity with a number of claims/objections and requests for further information relating to the proposed activity.
- GAP claim that Woodside has not consulted with all relevant persons and incorporated their feedback into the EP.
 - GAP requested Woodside consult with additional relevant persons (CCWA, AMCS, Indigenous stakeholders [and outline what engagement has taken place], marine tourism representatives [that operate not just in the OA but also in the vicinity of BIAs impacted within the EMBA).
- Disclosure of depth of experience of attendees of the Environmental Risk and Impact Identification Workshop.
 - GAP requests that Woodside provide the regulator with additional information about potential and actual conflicts of interest amongst the workshop participants to ensure the regulator and public can have confidence about the hazard identification and evaluation.
- Routine acoustic emissions relating to seismic survey equipment and the avoidance of impacts. GAP also made a number of claims about the impacts of the activity and recommendations:
 - Additional information to explain why the activity (survey) needed to be repeated.
 - Requests that Woodside use lower impact technology alternatives in line with ALARP, and if they don't provide evidence as to why.
 - Woodside has failed to address direct impacts to fauna, particularly predator/prey interactions and how an increase in zooplankton mortality impacts whales.
 - Woodside assess and report on potential cumulative impacts from all activities (upstream and downstream) to be conducted at the Scarborough site as a whole, especially in relation to acoustic impacts, and considers interactive cumulative effects.
 - Woodside should commission additional modelling estimate the activity's impact on zooplankton.
 - Noise pollution exceeding the impact thresholds identified in the EP should be prohibited by Woodside during peak cetacean activities (April to July northern migration and November to December southern migration), and additional acoustic monitoring to be done.
 - Evidence about likely masking impacts and song interference with respect to cetaceans.
 - Distance modelling values in Tale 6-7 for all species be revisited.
 - Assess options to perform acoustic monitoring for cetaceans up to 60.7km away from the sound source.
 - Activities should cease immediately after malfunction of or damage to the passive acoustic monitoring system.
 - Full assessment of the displacement costs and impacts for cetaceans.
 - Before and after monitoring of marine mammal presence, density and distribution, plus submit a monitoring and mitigation plan.
- Routine acoustic emissions relating to vessels and AUV. GAP recommends that Woodside includes modelling evidence to demonstrate the distance over which continuous noise levels could potentially impact cetacean behaviour, and factor results into its impact assessment.
 - Accidental hydrocarbon release: vessel collision. GAP recommended that:
 - The EMBA be recalculated based on the amended worst-case scenario, and should it extend into the Ningaloo World heritage area or any of the marine protected areas following the recalculation, it should be taken into consideration in the EP.
 - Table 6-17 should be expanded to include the various BIAs that overlap with the EMBA and Montebello AMP. Additionally, information should be included as to the probability of hydrocarbon contact within each BIA.
 - Timing of the activities be restricted further to help reduce the likelihood of a spill impacting threatened species.
- Physical presence: vehicle collision/entanglement with marine fauna. GAP recommended that:
 - Woodside employ two additional marine fauna observers on each support vessel
 - All vessels operated by Woodside, its contractors or servicing the project be restricted to a maximum speed of 8 knots when in the operational area (except in the event of an emergency).
- GAP makes a number of claims that Woodside is not fit and proper to hold an Access Authority and Environmental Plan.
 - GAP claim that until Woodside provides more information on the aspects raised in its letter, it's not possible for the regulator to assess whether impacts have been reduced to acceptable and ALARP levels. If GAP's concerns are not addressed, it recommends that the regulator does not accept the EP.
- GAP requested an updated version of the EP once it has been drafted.

- On 22 July 2022, Woodside emailed GAP and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate (Appendix F, reference 1.34).
- GAP has been provided with a reasonable level of information and a sufficient period to respond for the purposes of consultation on this EP.
- Woodside has complied with the consultation requirements set out in Reg 11A of the Environment Regulations in relation to the consultation process for this EP.
 - This includes consultation with CCWA, and a summary of that consultation is provided in this EP (Section 5.7; Revision 3).
 - Woodside has followed requirements of sub-regulation 11A (1) of the Environmental Regulations to identify relevant persons for its EPs.
 - Woodside has engaged with relevant stakeholders (including MAC and other relevant Traditional Owner groups) since 2018. This includes consultation on relevant Scarborough activities in Commonwealth waters during the development of the Scarborough Offshore Project Proposal, and activities in State waters as part of the Scarborough Project Nearshore Component environmental review.
 - Ongoing consultation can occur during the life of an EP and enables updates on activities and a continued understanding of stakeholder views. The EP has been updated (Section 5.8 and Section 7.9.2.1; Revision 3) to outline Woodside's ongoing consultation approach and engagements in accordance with Regulation 14 (9) of the Environmental Regulations.
 - Woodside advised it welcomes ongoing feedback on its activities from stakeholders. Woodside also provided details of its publicly available Information sheets on Woodside's EPs.
- Woodside confirmed the experience of the participants at the Environmental Risk and Impact Identification workshop to address GAP's information request.
- Woodside provided an explanation as to why the survey must be repeated, as no further uplift can be gained from the 2004, 2010 and 2018 data. Additionally, the original survey does not extend over the full Scarborough gas field or over the Jupiter gas field.
- Woodside advised that the technical alternatives proposed by GAP are either yet to be developed commercially (marine vibroseis) or are not considered a lower impact technology (ROV deployed OBN).
- The EP has been updated to include consideration of marine vibroseis in the ALARP assessment (Section 6.6.3; Revision 3). Due to not yet being commercially available, as described above, it has not been adopted.
- Woodside confirmed that the risk assessment in the EP concludes that impacts to zooplankton are likely to be localised (>110m from the seismic source) and localised changes in zooplankton abundance are likely to be replenished and indistinguishable from natural levels and distributions within hours of a seismic survey vessel passing.
 - The EP (Section 6.6.2; Revision 3) has been updated to include a statement that impacts to zooplankton are unlikely to result in impacts to higher order trophic levels.
- Woodside has assessed the cumulative impacts of the Petroleum Activities Program in relation to other petroleum activities which could realistically result in overlapping temporal and spatial extents. The potential cumulative impact of concurrent seismic activities is assessed in Section 6.6.1 (Physical presence) and Section 6.6.2 (Routine Acoustic Emissions; Seismic Survey Equipment) (Revision 3).
 - The EP was updated to acknowledge that Scarborough drilling and completion activities may be undertaken within WA-61-L however there will be no temporal overlap and therefore no cumulative impacts are predicted with this activity. This is outlined in Section 6.3 of the EP (Revision 3).
- Woodside advised that additional modelling over and above the mortality threshold (110m) for zooplankton is not warranted. Woodside also provided information about its involvement in the North West Shoals Research Program.
- Woodside explained its use of JASCO Animal Simulation Model including Noise Exposure (JASMIN) to predict the exposure of animals (pygmy blue whales) to sound arising from the seismic activity. It is regarded as best practice for surveys taking place within or adjacent to pygmy blue whale migration and foraging BIAs.
 - Based on the animal modelling results, the conservative range for potential TTS effects in pygmy blue whales is ~22 km from the seismic source, compared with 60.7 km range predicted from the acoustic modelling. The closest point of approach from the Active Source Area and the migration BIA is ~30km, and therefore, pygmy blue whales will continue to utilise the migration BIA without injury, and therefore the activity is not inconsistent with the Conservation Management Plan for Blue Whales.
- Woodside provided results from the Thums et al. (2022) and Double et al. (2014) satellite tracking studies on pygmy blue whale migration, which does not support GAP's hypothesis that the Active Source Area is frequently used by pygmy blue whales.
 - Woodside advised that it is highly unlikely that the activity would displace pygmy blue whales from any critical habitat, such as foraging location or resting area.
- Woodside advised that the EP (Section 6.6.2; Revision 3) has been updated to provide further information on masking impacts to pygmy blue whales.
 - Woodside advised that individual pygmy blue whales are expected to pass through the ensouffled area in less than 24 hours and are highly unlikely to have exposure times to cause TSS.
 - As impacts to whales are already reduced to ALARP and acceptable levels, acoustic monitoring for cetaceans up to ~60m from the sound source is considered disproportionate to any environmental benefits.
- Woodside advised that the adopted thresholds presented in Table 6-7 are based on the best data available published in peer-reviewed literature and represent conservative internationally accepted and applied impact evaluation thresholds.
 - Woodside provided additional information about the TSS threshold level and SPL in regard to the potential impact from acoustic emissions. Woodside advised there are multiple SEL threshold criteria that can be applied and the marine mammal behavioural threshold presented in Table 6-5 is based on current NOAA (2019) criterion for marine mammals. This is why the TSS onset range always considerably exceeds the behavioural response range in modelling studies of acoustic emissions from seismic surveys.
- Woodside confirmed that the TSS impacts to LF-cetaceans are predicted to be constrained to within ~22km (with a 24 hour exposure) of the seismic source (Table 6-7). Woodside reiterated information about the outcome of the tagging study of pygmy blue whales. Therefore, as impacts are already reduced to ALARP and acceptable levels, no TSS is predicted in pygmy blue whale migration and acoustic monitoring up to ~60km from the sound source is considered disproportionate to any environmental benefit.
 - Woodside advised that the passive acoustic monitoring system (PAM) is engineered for multiple redundancy and a malfunction or failure due to catastrophic streamer damage is highly unlikely and is managed to ALARP, e.g. a number of conditions must be met to allow operations to continue without PAM, as described in the EP.
- Woodside advised that the Activity Source and Operational areas for the Scarborough 4D MSS, whilst within the distribution range for pygmy blue whales, are outside of the migration BIA, and also not in an area where foraging or resting is likely to take place. Additionally, the activity does not overlap BIA's for any other marine mammal species. Hence, dedicated pre-and post-survey monitoring of marine mammals is not warranted.
 - Woodside advised that seismic source emissions are not regarded as continuous a noise source as they are brief and intermittent with rapid rise times and decay back to ambient levels (within a few seconds).
 - Modelling and measurement studies have demonstrated that the threshold for behavioural responses in marine mammals from continuous noise sources would not be exceeded beyond a range of several kilometres from relatively small, slow-moving vessels such as a seismic survey vessel accompanied by a support vessel.
- Woodside advised that the worst-case scenario in the EP is based on collision, an impact between two moving vessels. Furthermore, no change has been made to the worst-case scenario as it is in line with calculating the maximum worst case spill, for a collision, based on the volume of the largest fuel tank. Woodside noted that collision relating sinking of a seismic survey vessel has never occurred in Australia in over 50 years of seismic operations.
 - Woodside advised that the inclusion of the probability of hydrocarbon contact with the BIA has not been included as it is not considered to help inform the impact assessment and demonstration of ALARP and acceptability.
- The impact and ALARP assessment in the EP has demonstrated that in the highly unlikely event that a spill occurs and that the plume reaches those BIAs, that the risk is ALARP acceptable.
 - The Montebello AMP was included in the EMBA in Section 4 conservatively, however modelling did not predict contact with the AMP ecological thresholds. Section 4 (Revision 3) has been updated to clarify.

- Woodside advised a number of controls that are planned to be implemented in order to reduce the risk of a collision. In the event of a worst-case spill, impacts would be limited to individual threatened species and are not expected to impact on the overall population viability of the species.
 - The risk has been managed to ALARP and acceptable level and no changes have been made to the EP.
- Woodside advised that the use of additional marine fauna observers on the support vessel (over and above two employed on the support vessel) is not warranted.
 - Woodside reiterated information provided about the Active Source and Operational areas of the Scarborough 4D MSS being outside the migration BIA, and accordingly, the likelihood of encountering the pygmy blue whale and other cetaceans is expected to be low.
 - The EP includes application of the EPBC Act Policy Statement 2.1 Part B.6 – Adaptive measures to minimise the potential impacts to pygmy blue whales from seismic noise, which will be triggered if encounters with pygmy blue whales are more frequent than suspected.
- Woodside confirmed that the seismic vessel maintains a constant upper speed of 5 knots when in operation to minimise the noise of movement of water over the seismic streamers. This largely dictates the speed of both the escorting support and chase vessel that accompanies the survey vessel.
 - Vessels adopt the go-slow buffers around marine fauna as per EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans (C14.1).
 - The EP has been updated to include consideration of vessel speed in the ALARP assessment (Section 6.7.6; Revision 3).
- Woodside has responded to Greenpeace's concerns raised and updated the EP where indicated. Woodside considers the impacts have been reduced to ALARP and acceptable levels, as demonstrated in the EP. NOPSEMA will determine whether they are reasonably satisfied that the EP meets the acceptance criteria, including criteria 10A (b) and (c).
- Full copies of draft EPs are not provided to stakeholders while they are being developed or under assessment. The EP has been revised through the NOPSEMA assessment process and the responses provided in this document reflect the information under assessment with NOPSEMA.
- On 2 August 2022, GAP provided correspondence to NOPSEMA (Woodside CC). GAP requested an additional two weeks to provide feedback.
- On 16 August 2022, GAP emailed Woodside (NOPSEMA CC):
 - GAP reiterated its feedback, objections and claims from 29 June 2022 relating to:
 - Consultation with all relevant persons
 - Evaluation of all impacts and risks
 - Demonstrating that the environmental impacts and risks will be reduced as low as reasonably practical
 - Demonstrating that the environmental impacts and risks will be of an acceptable level
 - The EP is inconsistent with Blue Whale Conservation Management
 - GAP provided additional information and literature to its claims.
 - No new claims or objections were raised requiring additional specific mitigation measures or controls.
 - Greenpeace request copies of specific documents cited in the Environment Plan.
- On 1 September 2022, GAP provided correspondence to NOPSEMA (Woodside CC) that contained a number of claims/objections relating to the proposed activity.
 - GAP requests that NOPSEMA not accept the EP as Woodside has not met its consultation obligations under reg 11A of the Environment Regulations nor demonstrated the criteria for acceptance of the Environment Plan in reg 10A.
 - GAP requests that, if necessary, the regulator should make a request to Woodside for further information under reg 10(1)(b) in relation to the additional information identified as being required by GAP.
- On 12 September 2022, Woodside responded to GAP and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate (Appendix F, reference 1.35).
 - Woodside noted that correspondence dated 1 September 2022 relates to Woodside's incorporation of GAP's previous feedback in the Scarborough 4D B1 Marine Seismic Survey Environment Plan, and no new claims or objections have been raised.
 - Woodside added following further feedback and assessment the EP has been updated (Section 5, Revision 4) which includes an updated consultation approach and relevant person and additional person identification process (see Section 5.4). The update to the EP includes further clarification on the identification of a person whose functions, interests or activities may be affected by the activity.
 - Woodside provided details of the number of factors that inform the stakeholder consultation approach.
 - Woodside described its process to determine that the marine tourism representatives' function, interests and activities are not impacted by the proposed activity.
 - Woodside has updated the EP (Section 7.9.4.3, Revision 4) and the First Strike Plan (Appendix I, Revision 4) to provide additional guidance on its incident reporting approach.
 - Woodside advised and listed specific controls that are in the EP (Section 6.6.2, Revision 4) to manage risk to an ALARP and acceptable level, addressing GAP's specific claims.
 - Regarding the potential for acoustic emissions from the seismic source to mask calls between migrating pygmy blue whale mothers and calves, Woodside confirmed potential impacts are limited by a number of factors and masking between mother and calves is not expected. Further clarification has been included in Section 6.6.2 (Revision 4).
 - Woodside has responded to GAP's concerns raised and updated the EP where indicated. Woodside considers that the impacts have been reduced to ALARP and acceptable levels, as demonstrated in the EP. NOPSEMA will determine whether they are reasonably satisfied that the EP meets the acceptance criteria, including criteria 10A (b) and (c).
 - Woodside will review list of documents requested and determine if they can be provided, where appropriate.
 - Woodside advised the availability of the reports and findings of the North West Shoals to Shore Program on the AIMS website.
- On 6 December 2022, GAP provided correspondence to Woodside (NOPSEMA CC) that contained a number of claims/objections relating to the proposed activity.
 - GAP reiterated its feedback, objections and claims from 29 June 2022 relating to:
 - Consultation with all relevant persons
 - Evaluation of all impacts and risks
 - Demonstrating that the environmental impacts and risks will be reduced as low as reasonably practical
 - Demonstrating that the environmental impacts and risks will be of an acceptable level
 - The EP is inconsistent with Blue Whale Conservation Management
 - GAP asks that Woodside assesses (and provides to NOPSEMA) the tracking data underlying the pygmy blue whale movement research papers to justify its claim

- GAP continues to contend that the EP is inconsistent with the Blue Whale Conservation Management Plan.
- GAP asks Woodside to provide comprehensive justification (beyond the EP and JASCO modelling) as to how animal modelling demonstrates compliance with requirement of the Blue Whale Conservation Management Plan.
 - GAP asks Woodside for justification for failing to base its impact assessment on the slowest pygmy blue whales in population.
 - GAP asks that Woodside provide information on the total number of tracked whales whose behaviour has been incorporated into the animal modelling, and what proportion of the population this number equates to.
 - GAP considers that the EP should not rely on animal modelling to define the area over which acoustic impacts will exceed the low frequency threshold values. The modelling is not sufficient to “demonstrate” the matters in reg 10A(b)-(c) of the Regulations.
- GAP requests that Woodside provides full and detailed justification (beyond what provided in the EP and Koessler et al 2021) for the use of assumptions and inputs that underlie the JASCO animal modelling.
 - GAP also makes specific information requests about animal movements in migration.
 - GAP makes information requests about closest point of approach for pygmy blue whales, data summarising maximum distance relating to acoustic impacts and injury
- GAP claims that Woodside is failing to adhere to the principles of ecological sustainable development outlined in NOPSEMA’s EP Decision Making Guideline, specifically “precautionary principle” and “biodiversity principle”.
- GAP contends that Woodside has not reduced acoustic risk and impact to pygmy blue whales to either an acceptable or ALARP level, therefore not meeting the criteria in reg 10A of the regulations.
- GAP urges Woodside to amend the impact assessment and the mitigation actions to address its concerns and ensure all pygmy blue whales can continue to use the migration BIA without injury.
- GAP urges Woodside to remove the animal modelling from the impact assessment.
 - GAP states that if Woodside continues to rely on animal modelling despite its concerns, it urges Woodside to amend the underlying inputs, assumptions and methodology to fully address the issues it has raised; and
 - GAP urges Woodside to provide the additional information it has requested.
- GAP requested full text for sections 5.8 and 7.9.2.1 of revision 5 of the EP so it can understand the changes to Woodside’s approach to ongoing consultation.
- GAP again asked for an updated version of the EP to see how its feedback had been incorporated.
- GAP reiterated its request from 16/08/22 for full texts for the references.
 - On 17 March 2023, Woodside emailed GAP and attached a detailed table of responses to address specific claims and objections in the 1 September 2022 and 6 December 2022 correspondence regarding the proposed activity, where appropriate (Appendix F, reference 1.132).
- Woodside thanked GAP for its correspondence on the EP and advised it has revisited the available telemetry data (Thums et al., 2022) which has confirmed the track for one individual pygmy blue whale that travelled to the west of the migration BIA in the peak northbound migratory season (June 2022).
 - Woodside confirmed it has included a precautionary additional control (C4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the Seismic EP.
 - The control will be implemented in the peak northbound migration season (May and June) and comprises a spotter vessel (with two Marine Fauna Observers onboard) ahead of the seismic vessel to observe for PBWs.
- Woodside advised that based on the information provided throughout extensive consultation with GAP and set out within Attachment A of the email, Woodside believes it has provided GAP with sufficient information to allow GAP to provide Woodside with an outline of its claims, interests and activities as they relate to the proposed activity.
 - Woodside has also provided GAP with details of amendments made to the EP including additional controls, throughout consultation.
- Given the well-informed feedback received together with the length of time the Seismic EP has been open for comment, any further feedback GAP provides on the Seismic EP will be accepted and considered as part of ongoing consultation.
- Woodside has undertaken a comprehensive assessment, including full justification of the impacts and risks for the regulator to assess in accordance with: Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (the Environment Regulations) and NOPSEMA Guidance Note (N-04750-GN1344 A339814) EP Content Requirement.
- Woodside advised that GAP’s correspondence of 2 August 2022 and 16 August 2022 has been addressed by Woodside in its correspondence to GAP dated 12 September 2022.
 - This includes a response to JASCO’s JASWINE modelling referenced in the 1 September letter.
 - Where an amendment has been made in the EP in relation to the claims or objections raised, a reference has been included in the table.
 - The accepted EP will be published by the regulator NOPSEMA after assessment and acceptance.
- Woodside advised that the data used as input for the behavioural profiles was collated from sources provided in the Kossier et al. 2021 report. The satellite tracking data used to determine travel speed was sourced specifically from Möller et al. (2020). Refer to section 6.6.2 (Revision 0) of the EP for the assessment of potential impacts to pygmy blue whales.
- Woodside confirmed that the proposed activities are not inconsistent with the Blue Whale Conservation Management Plan. Woodside referred to Table 6-21 and Demonstration of Acceptability in Section 6.6.3 (Revision 0) in the EP which provides the assessment of relevant activities against the Blue Whale Conservation Management Plan, including relevant Environmental Performance Outcomes.
- Woodside confirmed as set out in the EP (Revision 0), as part of the demonstration of acceptability, an assessment is undertaken to demonstrate that the PAP detailed in the EP are not inconsistent with relevant principles of ESD (refer Section 2.7.2).
 - For all impacts and risks assessed in Section 6 of the EP an assessment was conducted to determine if the PAP was consistent with relevant principles of ESD. It determined that the activity is consistent with principles of ESD a), b), c), and d). Principle e) is not relevant to the activity.
- Woodside referred to Section 6.5.3 for the potential impacts of underwater noise generated by seismic survey equipment assessment and Section 6.5.4 for vessels (Revision 0). Woodside advised the impact assessment s use peer-reviewed literature and scientific studies, supported by activity-specific underwater sound propagation modelling and applicant of internationally recognised thresholds.
 - The impact assessments consider a range of receptor groups including (but not limited to) pygmy blue whales.
 - The impact assessments determined highest potential consequence for these receptors to be ‘D’ (Minor, short-term impact) for noise from survey equipment and ‘F’ (No Lasting Effect, localised impact not significant to environmental receptors) for noise from project vessels.
- Woodside referenced a list of controls in the EP (Section 6.5.3, Revision 0) to manage risk to an ALARP and acceptable level.
- Woodside referenced the additional control (C 4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the EP.
- Woodside advised the accepted EP will be published by the regulator NOPSEMA after assessment and acceptance. Woodside otherwise confirmed that the nature of the proposed seismic activity, as well as the location and description of the activity as set out in the Seismic EP and summary information documents, has not changed and remains the same as in the recently submitted versions of the EP.
- Woodside advised, where appropriate, it has provided GAP with details of amendments made to the EP including additional controls, throughout consultation.
- Woodside confirmed that the references requested by GAP are publicly available and provided the list of publicly available references.

- On 28 March 2023, GAP emailed NOPSEMA (and sent a copy of the email to Woodside) regarding this EP (originally submitted to NOPSEMA on 11 October 2021) and the additional information provided to GAP from by Woodside on 22 July 2022, 12 September 2022 and 17 March 2023.
 - GAP stated the information provided to GAP by Woodside and the consultation period fell short of the regulations and the EP did not meet the regulation criteria. Therefore, GAP urged NOPSEMA to not accept the EP.
 - GAP reaffirmed its relevant person status and provided a summary of consultation with Woodside to date.
 - GAP provided an explanation as to why consultation had not met minimum requirements.
 - GAP's relevant person consultation with Woodside on the EP was insufficient; Woodside had failed to:
 - adapt the consultation process to GAP's needs;
 - provide sufficient information;
 - provide sufficient time to consider additional information; and
 - meet the general principles for effective consultation.
 - GAP concluded that Woodside's consultation did not meet the requirements of NOPSEMA's Consultation Guideline or the "Environment Plan decision making" guideline. Woodside had not met its consultation obligations under reg 11A of the Environment Regulations nor demonstrated the criteria for acceptance of the Environment Plan in reg 10A. GAP urged NOPSEMA to not accept the EP and requested Woodside undertake consultation with GAP as required by reg 11A of the Environment Regulations.
- On 24 April 2023, GAP emailed Woodside regarding this EP and the additional information sent to GAP on 22 July 2022, 12 September 2022 and 17 March 2023. GAP discussed Woodside's consultation process to date and provided further feedback on this EP and the additional information Woodside had provided on the above dates. GAP:
 - Reaffirmed its relevant person status and provided a summary of consultation with Woodside to date.
 - Provided an explanation as to why consultation had not met minimum requirements.
 - Detailed the form of information it required as per the Regulations and NOPSEMA's Consultation Guideline as Woodside had not provided GAP with sufficient detailed information.
 - Detailed GAP's expectation around the provision of sufficient time for consultation.
 - Provided a detailed summary of the outstanding additional information GAP required.
 - Concluded by stating that until Woodside provided more information on the aspects detailed in the letter, it was not possible for GAP to provide feedback on the impacts and risks of the activity, nor was it possible for the regulator to assess whether the EP met the criteria and could be accepted.
- On 1 June 2023, Woodside emailed GAP in regard to its correspondence on this EP specifically referring to GAP's additional questions received in correspondence to NOPSEMA (cc. to Woodside) dated 28 March 2023 and Woodside's previous four responses regarding the Seismic EP.
 - Woodside stated that based on the information provided throughout extensive consultation with GAP since June 2022, Woodside has provided sufficient information and ample opportunity for GAP to review the information provided, provide input on the proposed activity, and respond to Woodside's consultation information.
 - Woodside pointed out that in GAP's correspondence on 28 March 2023, GAP stated "...our functions, interests and activities demand a high level of participation in the consultation process in the Environment Plan. We have previously provided thorough interrogation of various complex and technical elements within the Environment Plan and will continue to do so." Woodside stated that GAP has clearly demonstrated it has extensively reviewed the material that Woodside has made available for the requirements of consultation, as well as the full draft EP. Should GAP have further comments on the material it has interrogated, it should provide these in writing to Woodside. Woodside confirms that all feedback relevant to the proposed activity received from GAP to date has been reviewed and incorporated where applicable into the EP. Where appropriate, Woodside has also provided GAP with details of amendments made to the EP, including any updated or additional controls, throughout consultation.
 - Woodside further stated it has followed the requirements of the Environment Regulations in providing consultation information and communication to all relevant persons including continuing to accept feedback on all of its activities during EP development and across the life of the EP.
 - Regarding GAP's claim they had not been provided with sufficient information to respond to Woodside's latest correspondence; had not been provided with the additional information requested, and that Woodside had discouraged two-way consultation, Woodside referred GAP to Woodside's email sent to GAP on 17 March 2023, which contained a detailed table of responses to address their previous specific claims and objections regarding the proposed activity, where appropriate.
 - In response to GAP's claim that Woodside has failed to demonstrate compliance with reg 11A (2), Woodside stated it has assessed the information in GAP's correspondence that describes GAP's functions, interests and activities and how these may be affected by the proposed activity, along with any objections or claims raised by GAP and that this has been assessed against the comprehensive impact and risk assessment undertaken for the proposed activity.
 - In response to GAP's statement that GAP requires a thorough understanding of the potential environmental risks and impacts posed by the proposed activities within the EP and the mitigation actions proposed by Woodside, Woodside stated where appropriate, Woodside had previously provided specific technical information at GAP's request relating to impacts and risks and the management measures to allow GAP to make an informed assessment of the possible consequences of the proposed activity on its functions, interests or activities.
 - Woodside responded to GAP's claims regarding to Jasco animal modelling.
 - In response to GAP's request for a copy of the most recent version of the EP, Woodside stated it had provided GAP with the Consultation Information Sheet and a link to the full draft EP publicly available since October 2021 together with technical information relevant to GAP.
 - Woodside stated it had followed the requirements of the Environmental Regulation and provided information where possible.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>GAP has responded and:</p> <ul style="list-style-type: none"> self-identified as a relevant person and requested to be consulted on this EP and other Woodside EPs. requested more information on the activity. <p>GAP claims Woodside has not:</p> <ul style="list-style-type: none"> Consulted with all relevant persons; Adequately evaluated all impacts and risks; Adequately demonstrated that the environmental impacts and risks will be reduced to as low as reasonably practicable; Adequately demonstrated that the environmental impacts and risks will be of an acceptable level; And that the EP is inconsistent with the Blue Whale Conservation Management Plan and threatened species recovery plans; The EP is inconsistent with the principles of ecologically sustainable development, specifically the 'intergenerational principle'. <p>GAP has further responded and provided feedback, objections and claims relating to:</p> <ul style="list-style-type: none"> Consultation Impact and risk identification Routine acoustic emissions from seismic survey equipment, vessels and AUV Accidental Hydrocarbon Release - Vessel Collision Physical presence (unplanned) - interaction with marine fauna Woodside not being a fit and proper Proponent 	<p>Woodside assessed the feedback on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Section 6.6.2 of the EP has been updated with a new control (C.4.6). The control will be implemented in the peak northbound migration season (May and June) and comprises a spotter vessel (with two Marine Fauna Observers onboard) ahead of the seismic vessel to observe for PBWs.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on GAP's functions, interests or activities.</p>

Australian Conservation Foundation (ACF)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 5 September 2022, during the course of preparing this EP, ACF (represented by the Environmental Defender's Office (EDO)) self-identified and raised interest in this EP via correspondence on consultation material it had received from Woodside relating to other Scarborough EPs.
- On 12 September 2022, Woodside responded to ACF / EDO and attached a copy of the Consultation Information Sheet and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate.
- On 23 September 2022, Woodside followed up with ACF / EDO via email.
- On 27 September 2022, ACF / EDO responded via email and advised it would like to meet with Woodside to discuss the proposed activity.
- On 29 September 2022, Woodside responded to ACF offering a meeting on 10 October 2022.
- On 5 October 2022, ACF responded and provided its availability to meet via video conference.
- On 11 October 2022, Woodside provided a briefing to ACF via video conference on the proposed activity and the broader Scarborough Project. The briefing covered:
 - Scarborough project overview
 - Description of specific proposed activities (including this proposed activity) along with a map of the OA.
 - Woodside provided responses for ACF's queries regarding the Seismic EP and the respective proposed seismic activities.
 - ACF queried the difference between the Seismic EP OA and the Active Source Area
 - ACF raised not all titles in the OPP are included in the Operational Area/Active Source Area.
 - ACF asked why data from the previous seismic testing undertaken in 2004 be utilised? And what is gained from another seismic activity – which wasn't captured in previous testing.
 - ACF queried if the material updates to the version of the Seismic EP currently on the NOPSEMA site?
 - ACF provided feedback about the consideration of lower-impact technological alternatives.
 - ACF provided feedback and claims about perceived impacts on marine fauna:
 - The potential seismic activity to take place during pygmy blue whale migration periods.
 - Concerns around humpback whales being impacted by seismic activities as noted in studies undertaken by Dunlop (2017).
 - Negative impacts should be mitigated entirely, rather than avoided.
 - Acoustic pollution and negative impacts on whale calves
 - ACF provided feedback on the cumulative impacts of seismic and the proposed Scarborough Project more broadly.
 - Woodside addressed ACF's questions in relation to the activity scope and scale:
 - Woodside referred to Section 3.4.1 of the publicly available EP (Revision 0), referencing the definition of the Activity Source Area.
 - Woodside advised discharge of the seismic source during vessel run ins, run outs, soft starts and full fold seismic data acquisition will occur in the Activity Source Area. Seismic source testing will also occur in the Activity Source Area. The seismic source will not be discharged within this buffer.
 - Woodside referred to Section 3.4.2 of the EP (Revision 0), referencing the definition of the Operational Area. The seismic source will not be discharged within this buffer.
 - Woodside advised the Woodside-operated Petroleum Titles relevant to this PAP are listed in table 3-1 of this EP (Revision 0).
 - Woodside confirmed the latest version of the EP has been updated to include WA-63-R in Table 3-1, as it was inadvertently omitted from this table in Revision 0.
 - Woodside noted the PAP will be carried out under an access Authority which authorises an existing Petroleum Title Holder to carry out petroleum exploration or recovery operations, other than drilling a well, outside of the boundary of their existing titles.
 - Woodside advised the Activity Source Area and Operational Area show a buffer around the Woodside-operated Title(s) to enable full imagery and understanding of the entire Scarborough plus Jupiter reservoirs, which were not included in the original surveys.
 - Regarding the previous seismic testing data, Woodside referred to its correspondence sent on 12 September 2022.
 - Woodside advised that since Revision 0 the EP has been updated through successive revisions in response to feedback from NOPSEMA and stakeholders and shows examples of how feedback has been considered. Woodside confirmed that no material changes have been made to the location, duration or activity as described in the original EP, with the scope being narrowed over time as project definition is refined. Woodside provided an example of the decision to remove AUV seismic nodes from the PAP, which is reflected in subsequent versions of the EP.
 - Regarding the consideration of lower impact technological alternatives, Woodside referred to its correspondence sent on 12 September 2022.

<p>Woodside addressed ACF's claims in relation to impacts on marine fauna:</p> <ul style="list-style-type: none"> • The Activity Source and Operational Areas for the seismic survey, while within the distribution range for pygmy blue whales, are outside the migration BIA and that it is also not in an area where foraging or resting is likely to take place. • The activity does not overlap BIAs for any other marine mammal species. • The likelihood of encountering pygmy blue whales and other cetaceans is expected to be low, even if the timing overlaps peak periods for northbound and southbound migration. • The Active Source Area is located ~25km from the western boundary of the migration BIA and the results of satellite tracking studies showed that out of a total of 20 pygmy blue whales tagged and tracked during these studies there was only one individual migrating north that travelled to the west of the migration BIA. • Woodside referred to Section 6.6.2 (Revision 0) of the EP includes EPBC Act Policy Statement 2.1 art B.6 – Adaptive Management Measures to minimise potential impacts on pygmy blue whales from seismic noise, which will be triggered if encounters are more frequent than expected. • Woodside confirmed the seismic survey vessel maintains a constant upper speed of 5 knots which largely dictates the speed of escorting and chase vessels accompanying it. In addition the vessels adopt go-slow buffers around marine fauna as per EPBC Regulations 2000 Part 8 Division 8.1 Interacting with cetaceans (C15.1). • Additionally, Woodside provided a list of the controls in the EP to manage this risk to an ALARP and acceptable level. • Woodside advised that as a precautionary approach, it has included an additional control (C 4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the EP. • Woodside advised the Activity Source and Operational Areas are located a significant distance (138km) to the west of the humpback whale migration BIA. Woodside confirmed that Telemetry data from satellite tracking of northbound and southbound migrating humpback whale has confirmed the migratory pathways are within the continental shelf waters of the North-West Shelf. The location, distribution, and movement of humpback whales documented in the North-West Marine Region show that it is unlikely that migrating humpback whales will be encountered at any time of the year within the area of the proposed activity. • Woodside advised the EP (Revision 0) includes application of the EPBC Act Policy Statement 2.1 Part A standard management procedures to minimise the impacts to all cetaceans including humpback whales. • Additionally, Woodside provided a list of the controls in the EP to manage this risk to an ALARP and acceptable level. • Woodside also referred to the additional control added (C 4.6) Application of EPBC Policy Statement 2.1 Part B.3 – Use of additional vessels to detect presence of cetaceans (spotter vessel). • Woodside referred to section 2.6 of the EP (Revision 0) which describes Woodside's approach to addressing the risks and impacts associated with its activities. • This includes the application of international guidance in decision support, calibration and the hierarchy of controls which preferences elimination of risks and impacts over mitigative controls. The application of these tools results in a demonstration that each identified risk and impact is minimised to an ALARP level, as described in section 2.72 of the EP (Revision 0). • Regarding Acoustic pollution and negative impact on humpback whales, Woodside referred to section 6.5.3 of the EP which describes potential impacts of acoustic emissions on cetaceans. Woodside also referred to its correspondence on 12 September 2022. • Woodside addressed ACF's claims in relation to cumulative impact assessment. • Woodside referred its correspondence on 12 September 2022. 	<p>Summary of Feedback, Objection or Claim</p> <p>ACF has met with Woodside and provided additional consultation information on the broader Scarborough activities, including this proposed activity. ACF has provided feedback, objections and claims relating to:</p> <ul style="list-style-type: none"> • The activity scope and scale • Alternative technologies (lower impact) • Perceived impacts on marine fauna • Cumulative impact assessment. <p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p> <p>Environment Plan Controls</p> <p>Woodside has consulted ACF in the course of preparing this EP. Woodside has assessed the claims or objections raised by ACF. No additional measures or controls have been put in place. Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on ACF's functions, interests or activities.</p>
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The Wilderness Society (TWS)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 16 September 2022 Woodside emailed TWS advising of the proposed activity and provided a Consultation Information Sheet.
- Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the TWS public website.
- Woodside extended an opportunity to meet to discuss the proposed activity.
- On 21 September 2022, TWS emailed Woodside seeking an opportunity to meet in relation to the proposed activity.
- On 23 September 2022, Woodside emailed TWS to confirm it is able to offer a meeting on 27 or 28 September 2022.
- Woodside received an out of office reply and subsequently offered to meet on 3 October 2022.
- On 29 September 2022, TWS emailed Woodside and requested alternative options for meeting dates.
- On 30 September 2022, Woodside emailed TWS requesting it propose a suitable date to meet.
- On 30 September 2022, TWS emailed Woodside requesting to meet on either 6 or 7 October 2022.
- On 3 October 2022, Woodside emailed TWS confirming its availability to meet on 6 October 2022.
- On 3 October 2022, TWS emailed Woodside and confirmed the 6 October 2022 meeting time.
- On 4 October 2022, Woodside emailed TWS acknowledging its confirmation and advising it would receive a meeting invite.
- On 6 October 2022, Woodside provided a briefing to TWS on the proposed activities and the broader Scarborough Project. The briefing covered:
 - Scarborough project overview.
 - Description of specific proposed activities (including this proposed activity) along with a map of the OA.
- On 17 October 2022 Woodside emailed TWS:
 - Woodside attached a meeting summary which included responses to address specific claims and objections raised on the proposed activity, where appropriate. The following topics were covered relevant to the broader Scarborough activities, including this proposed activity.
 - The decision to consult TWS with regard to Woodside's proposed activities for the purpose of understanding how Woodside may mitigate any adverse impacts its activities may have on The Wilderness Society's functions, interests and activities.
 - The work undertaken to understand marine fauna populations and their migration patterns in relation to Woodside's proposed activities and the controls in place to mitigate any potential impacts, including, but not limited to, acoustic surveillance and marine fauna observers.
 - In response to questions raised by TWS during the meeting regarding perceived environmental impacts, Woodside confirmed that
 - A significant number of scientific studies and findings informed the Scarborough OPP and subsequent EPs, including Woodside-supported studies undertaken by the Australian Institute of Marine Science and The University of Western Australia
 - Scientific studies and modelling were also used to inform the impact assessment in relevant EPs which demonstrate the activities (i.e., seismic acquisition) will be performed in a manner that prevents injury to whales, and minimises the potential for biologically significant behavioural disturbance
 - Continuous consideration of cumulative impacts for the proposed activities under each EP, as was previously considered for the OPP, and
 - Regarding TWS's queries in relation to Woodside's engagement with Traditional Owners on the relevant EPs, Woodside confirmed it has undertaken extensive engagement with the relevant Traditional Owners and Traditional Owner representative groups with respect to the proposed activities. Woodside confirmed this engagement included archaeological and ethnographic surveys, which have informed the Scarborough EPs.
 - In relation to TWS's query regarding zooplankton and any potential impacts from the proposed activities on the broader food chain, Woodside confirmed scientific studies and modelling have been used to assess and ensure an ALARP and acceptable approach to activities.
 - Woodside noted that no new concerns or queries have been raised by TWS directly to Woodside that have not already been addressed by Woodside in each of the EPs discussed.
 - Noting TWS's more general interest in carbon offsets, biodiversity and native vegetation, though outside of the scope of the Scarborough Project consultation, Woodside would welcome the opportunity for TWS to meet with subject matter advisers from Woodside to discuss the work that is being undertaken in this space.
- On 19 October 2022, Woodside received correspondence from TWS via NOPSEMA dated 14 October 2022 that contained a number of claims/objections and requests for information relating to the proposed activity.
 - Woodside's current methodology and application regarding offset (carbon and biodiversity), in response to the proposed activities.
 - Any remuneration or business unit KPIs to the progression of the Environmental Plan or the commencement of the related activities.
 - Confirmation that the development of a cumulative/holistic impact assessment covers the full breadth of the development, production and decommissioning activities.
 - An outline of how dissenting scientific or technical expertise to Woodside's proposal was identified, actively sought and considered in the EP.
 - Contemporary approaches to reducing the outstanding issues arising from views regarding the impacts of seismic survey activity on zooplankton population (particularly as cited by McCauley et al. (2017) and recommended by the Senate Inquiry.
 - Woodside's current and proposed investment in alternative or lower-impact technological innovations to seismic surveying.

- On 14 February 2023, TWS emailed Woodside in response to the letter provided by Woodside on 17 October 2022 regarding Woodside's Scarborough Subsea Installation EP. TWS' email contained a number of claims/objections and request for information relating to the proposed activity.
 - TWS provided feedback on Woodside's consultation process, highlighting that consultation should be adaptable and specifically designed for each relevant person. TWS additionally claimed that a statement of finality by Woodside that declares consultation has been undertaken, does not mean that this consultation was satisfactory, nor does it mean that the method or conclusion of consultation has been mutually agreeable.
 - How has Woodside addressed the risk of real or perceived bias in relation to funding, support or influence of scientific studies, for example those cited as undertaken by The Australian Institute of Marine Science (AIMS) and The University of Western Australia (UWA)? TWS highlighted AIMS has cited in its 2021-22 corporate plan that 46% of its external funding is provided by industry. The linkages between UWA and industry are well understood.
 - What carbon and biodiversity offsets are currently proposed by Woodside, where are these offsets located and how are these offsets being certified?
 - Does any corporate or business unit KPI suite link to the progress and finalisation of EPs to employee or contractor remuneration?
 - How is Woodside reconciling its confirmation of localised and indistinguishable impacts of seismic surveys
 - Comparisons of previous seismic surveys to Table 6-0 of this EP and quantitative data relating to the frequency, volume, duration of seismic blasting undertaken during prior surveys.
- On 22 February 2023, TWS emailed Woodside to check its 14 February 2023 email had been received.
- On 23 February 2023, Woodside emailed TWS to confirm its 14 February 2023 email had been received.
- On 17 March 2023, Woodside emailed TWS and attached a detailed table of responses to address specific claims and objections raised during the 6 October 2022 meeting, and within the 14 October 2022 letter (received by Woodside on 19 October 2022 via NOPSEMA) and the 14 February 2023 letter regarding the proposed activity, where appropriate.
 - Woodside confirmed that the claims raised by TWS are already addressed in the Seismic EP. Therefore, given the in-depth meeting with TWS on 6 October 2022, the well-informed feedback received and responded to in the meeting, subsequent correspondence from Woodside together with the length of time the EP has been open for comment, any further feedback provided by TWS on the Seismic EP will be accepted and considered as part of ongoing consultation.
 - Woodside advised the Seismic EP assesses both direct and indirect environmental impacts and risks associated with the PAP, having regard to the nature and scale of the PAP. The extraction of Scarborough gas for onshore processing is not included in the PAP for this EP. Therefore, indirect impacts and risks arising from onshore processing of Scarborough gas are not considered indirect impacts/risks of this PAP but will be considered in relevant Scarborough EPs as appropriate.
 - Woodside confirmed there is no linkage to remuneration or bonus schemes for achievement of EP acceptance.
 - Woodside advised cumulative impacts for this activity are assessed in later revisions of the EP. Woodside referred to Control 7.1 in the EP (Revision 0) as an example. Woodside referred to Table 6-11 of the EP (Revision 0) which identifies other potential seismic surveys occurring in the region; the closest being approximately 27.5km away, with a four-year window for execution.
 - Woodside advised the importance of scientific understanding and knowledge to its environmental management approach. Woodside confirmed that input from internal subject matter experts and external specialists with proven track records and academic credentials is part of the established EP process. This includes consideration of recently published peer-reviewed data and studies to inform understanding of risk and impact assessment, and consideration of current best practice controls within the ALARP framework.
 - Regarding feedback relating to seismic survey activity impacts on zooplankton, Woodside referred to its correspondence on 17 October 2022, where this topic is addressed.
 - Woodside referred to Section 6.7 of the EP that assesses the impacts of seismic surveys on zooplankton.
 - Woodside advised the EP has been updated to include a statement that impacts that zooplankton are unlikely to result in impacts to higher order trophic levels.
 - Additionally, Woodside provided a list of the controls in the EP to manage this risk to an ALARP and acceptable level.
 - Regarding investment in alternative or lower-impact technologies, Woodside referred to its correspondence on 17 October 2022, where this topic is addressed.
 - Woodside confirmed it has and continues to follow the development of marine seismic vibrator technology and has participated in technical forums held with seismic contractors. However, marine seismic vibrator technology is still in research and development and is yet to be offered commercially.
 - Woodside advised the newest revision of the EP has been updated to include consideration of marine seismic vibrator technology in the ALARP assessment.
 - Woodside advised it considered a trial of a small-scale ocean bottom node (OBN) survey using emerging technology with AUV, which was included in earlier versions of the EP, however, due to technical issues with this technology the scope was removed from Revision 5 of the EP. Woodside also noted that an OBN survey still requires an energy source.
 - Woodside advised that the Australian Institute of Marine Science (AIMS) operates under the Australian Institute of Marine Science Act 1972 (Cth) and is engaged in research.
 - The Act allows AIMS to participate in partnerships and the Statement of Ministerial Expectations requires that AIMS work with industry.
 - Woodside advised that it and AIMS have a long-standing relationship spanning more than 25 years. Woodside provided key details to the success of that partnership to address TWS' specific claims. For example, the source of AIMS funding has no influence on how the science is conducted or reported.
 - Woodside advised that Routine Atmospheric and GHG emissions associated with the seismic activity have been added to Section 6.7.2 of the revised EP. This includes an additional control that requires the evaluation of tenders for the project will include consideration of vessel fuel usage / emissions and low carbon / alternative fuels (C 8.2).
 - Woodside confirmed there are no corporate or business unit KPI suite links to the progress/finalisation of EPs to employee or contractor remuneration.
 - Regarding impacts of seismic surveys and previous seismic surveys, Woodside advised it has undertaken a comprehensive assessment, including full justification of the impacts and risks of seismic surveys for the regulator NOPSEMA to assess in accordance with the Environment Regulations and NOPSEMA Guidance Note (N-04750-GN1344339814) EPC Content Requirement.

<p>Summary of Feedback, Objection or Claim</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p>	<p>Environment Plan Controls</p>
<p>Woodside has received feedback from TWS during the course of consultation on a range of Woodside EPs covering the broader Scarborough activities. TWS has provided feedback, objections or claims about the proposed activity, and the broader Scarborough project relating to:</p> <ul style="list-style-type: none"> • Consultation process • Industry funding, support or influence on scientific studies • Carbon and biodiversity offsets • KPIs and remuneration relating to EP process and completion • Impacts of seismic surveys • Previous seismic surveys 	<p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on TWS's functions, interests or activities.</p>

Say No to Scarborough Gas (SNTSG)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 16 September 2022 Woodside emailed SNTSG advising of the proposed activity and provided a Consultation Information Sheet.
- Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the SNTSG public website relating to Climate change and GHG and Rock art and Aboriginal cultural heritage.
 - Woodside confirmed that the concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Seismic EP.
 - Woodside advised the Seismic EP assesses both direct and indirect environmental impacts and risks associated with the PAP, having regard to the nature and scale of the PAP. The extraction of Scarborough gas for onshore processing is not included in the PAP for this EP. Therefore, indirect impacts and risks arising from onshore processing of Scarborough gas are not considered indirect impacts/risks of this PAP but will be considered in relevant Scarborough EPs as appropriate.
 - Woodside advised that Routine Atmospheric and GHG emissions associated with the seismic activity have been added to Section 6.7.2 of the revised EP. This includes an additional control that requires the evaluation of tenders for the project will include consideration of vessel fuel usage / emissions and low carbon / alternative fuels (C.8.2).
 - Woodside confirmed that activities covered by this EP are located ~374km away from Murujuga and will have no impact on access to sites of cultural and spiritual significance. Woodside also confirmed there would be no impact from emissions or rock art displacement and that damage to heritage sites is not anticipated.
 - Woodside advised it has undertaken archaeological assessments and ethnographic surveys to identify cultural heritage that may be impacted by the Scarborough development. These works have not identified any heritage places, objects or values which will be impacted by the activities covered in this EP.
- Woodside extended an opportunity to meet to discuss the proposed activity.
- On 23 September 2022 Woodside followed up with SNTSG via email.
- On 29 September 2022 SNTSG emailed Woodside requesting more time to provide feedback and asked for a copy of the current version of the EP.
 - SNTSG advised its availability to meet with Woodside to discuss the EP.
- On 4 October 2022 Woodside emailed SNTSG confirming its availability to meet on 10 October 2022.
- On 5 October 2022, SNTSG emailed Woodside advising it was unavailable to meet on 10 October 2022 and requested to meet on 13 October 2022.
- On 6 October 2022 Woodside emailed SNTSG confirming its availability to meet on 13 October 2022.
- On 11 October 2022 SNTSG emailed Woodside in response to other Scarborough EP consultation and referenced that its focus of the scheduled meeting on 13 October 2022 was to discuss a separate specific proposed Woodside activity.
 - SNTSG noted that more information about all of the EPs will be valued but SNTSG will require more time after the meeting to give feedback and go through a thorough consultation process.
- On 11 October 2022 Woodside emailed SNTSG:
 - Woodside confirmed the purpose of the meeting is to provide context and an overview on the upcoming activities for the Scarborough Project to allow for feedback and information to be provided as relevant.
 - Woodside advised it will discuss a number of Scarborough EPs.
 - Woodside encouraged SNTSG to share any interests, claims or concerns it has in relation to these EPs to inform Woodside of appropriate measures it may take to mitigate any adverse impacts Woodside's activities may have.
- On 12 October 2022 SNTSG emailed Woodside and advised: it will endeavour to give as much feedback as possible on the day and as soon as it can after the 13 October 2022 meeting.
- On 13 October 2022, Woodside provided a briefing to SNTSG on the proposed activities and the broader Scarborough Project. The briefing covered:
 - Scarborough project overview
 - Description of specific proposed activities (including this proposed activity) along with a map of the OA.
 - During the meeting SNTSG noted it will provide Woodside, early in the week commencing Monday, 17 October 2022, with a summary of concerns it has in relation to the relevant EPs.
 - During the meeting, SNTSG asked questions and provided feedback regarding:
 - The purpose of the seismic survey, specifically why data cannot be used from previous seismic testing undertaken in 2004. SNTSG asked what is gained from another seismic activity? Is the survey required due to the time that has passed since the last survey, and what is the minimum acceptable time between surveys?
 - Activity timing, specifically the timing of the proposed activity, timing of other surveys to ensure they do not take place at the same time.
 - SNTSG noted the fact sheet is out of date from May 2021, and asked of there has been material changes to the EP.
 - Activity location, regarding the activity source area size against the WA-61-L title and difference between the EP operational area and activity source area, and titles inclusion in the operational area and active source area.
 - Underwater noise, regarding impact on marine species. SNTSG requested an expert opinion on impacts.
 - Impacts of the activity on pygmy blue whales
 - Impacts of cyclones on the activity and union consultation on potential cyclone risk
 - Impacts on zooplankton and the marine food chain
 - Whale shark vessel strike risk regarding vessel speeds over 10 knots
 - Light emissions, specifically what results have been determined from assessments undertaken on artificial light
- On 14 October 2022 Woodside emailed SNTSG:
 - Woodside acknowledged the EPs discussed during the meeting and noted the date of week commencing 17 October 2022 for SNTSG to provide feedback.
 - At the request of SNTSG, Woodside resent the consultation information sheet as SNTSG mentioned it had not yet received it. Woodside confirmed that it emailed SNTSG and sent the consultation information on 30 September 2022.
 - Woodside encouraged SNTSG to visit the Consultation Activities page of the Woodside Energy website, where all Consultation Information Sheets can be located, and to sign up to the mailing list on the Consultation Activities page, enabling it to receive notifications when new Information Sheets are released.

- On 19 October 2022, Woodside received correspondence from SNTSG via NOPSEMA dated 29 September 2022 which advised the regulator of the engagements and consultation conducted by Woodside.
- On 16 November 2022, SNTSG emailed Woodside and included a letter. The letter contained a number of claims/objections relating to the proposed activity.
 - SNTSG provided feedback about community consultation:
 - Community consultation, stating there was no information on which communities and community groups would be consulted. Further, there was no information on what the process would be for incorporating feedback and then re-releasing the EPs. SNTSG asked if Woodside will publish it's redrafted EP's
 - Indigenous peoples and communities have strong cultural and spiritual connections to sites within the EPs and would have an interest in management decisions impacting culturally important oceanic fauna. To what extent are they being consulted? Which communities are being consulted? And how is their feedback incorporated into the EPs?
 - Query whether certain groups had been consulted such as Australian Marine Conservation Society and marine tourism operators
 - SNTSG commented it was concerned that project work was well underway, before approvals had been granted, and that parties are acting as though environmental approvals are guaranteed.
 - SNTSG provided feedback about consistency with existing conservation plans or ecological principles:
 - SNTSG claims the plans are not consistent with ecological principles of sustainable development, particularly the intergenerational principle. It asked how Woodside plans to meet these principles.
 - SNTSG asked how the plan is consistent with the Blue Whale Conservation Management Plan and threatened species recovery plans
 - SNTSG provided feedback about independence:
 - SNTSG asked about the skills of the people at the Environmental Risk and Impact identification workshop and their ties to Woodside and any conflicts of interest they hold. SNTSG also asked about the lifetime for identifying environmental risk and impact identification.
 - Regarding environmental impacts and risks being reduced to ALARP, SNTSG asked who is responsible for determining what is reasonably practical and what their ties are to Woodside, and what grounds are the determinants for ALARP based upon (economic or environmental)?
 - SNTSG provided feedback on emissions:
 - Emissions caused by the project are a major concern for SNTSG and it noted the EPs ignore scope 1, 2, and 3 and they cannot be ignored when considering approvals. SNTSG requested more information and figures on the lifetime of emissions of the project and emissions forecasting, consistency with conservation management plans and species recovery plans, Woodside's response to various external reports and sources, CCS and carbon offset planning, emissions projections and Scope 3 emissions.
 - SNTSG provided feedback on lighting:
 - What are the impacts of artificial lights on ecological processes and sea birds? Why are the routine light emissions impacts estimated to have an impact for less than one year? Will Woodside commit to the National Light Pollution guidelines for Wildlife?
 - SNTSG provided feedback on ecosystem impacts:
 - Ecosystem impacts such as effects of climate change on interactions between marine life and the disturbance and pollution caused by the project, ecological parameters used to assess impacts on species / populations etc., the process of the deep-water survey, microbial communities and carrying out work during PBW migration season
 - SNTSG provided feedback on seismic activity:
 - Concern over Woodside's ALARP system. SNTSG asked for definitions about ALARP, and measures taken.
 - Requested an updated version of the information sheet.
 - The need for another seismic survey, why Woodside could not use data collected in 2004?
 - The timing of the activity and overlap of testing and behavioural effects of the activity on species outside of the operational area.
 - Impacts of cyclones on the activity and union consultation on potential cyclone risk
 - SNTSG asked or access to results from animat modelling and details about the decibel level of the seismic blasting.
 - Have expert opinions been sourced regarding exposure experiments and observed behaviours, and whether the experts are part of the community consultation.
 - SNTSG asked Woodside's plans about the impacts on zooplankton
 - SNTSG asked the speed at which the vessels are travelling during the surveys.
 - On 17 March 2023, Woodside emailed SNTSG and included responses to address specific claims and objections raised during the 13 October 2022 meeting, and the 16 November 2023 correspondence regarding the proposed activity, where appropriate.
 - Regarding the purpose of the seismic activity, Woodside provided an explanation as to why the survey must be repeated, as no further uplift can be gained from the 2004, 2010 and 2018 data. Additionally, the original survey does not extend over the full Scarborough gas field or over the Jupiter gas field.
 - Woodside advised that the requirement of the survey is not related to a specific time period between surveys.
 - Regarding the activity timing, Woodside advised details determining the timing of the activity, two years from EP acceptance.
 - Woodside advised the EP (revision 0) contains Control 7.1 requiring a separation distance from any identified concurrent seismic survey to reduce the potential for cumulative impacts.
 - Woodside referred to table 6-11 in the EP (revision 0) which identifies other potential seismic surveys occurring in the region, the closest being 275km away with a four year window execution.
 - Woodside confirmed a revised version of the consultation sheet is available on its website. Since Revision 0, which is available on the NOPSEMA website, the EP has been updated through successive revisions in response to feedback from NOPSEMA and stakeholders. No material changes have been made to the location, duration, or activity, as described in the original document and fact sheet.
 - Regarding the activity location, Woodside advised the Woodside-operated Petroleum Titles relevant to this PAP are listed in table 3-1 of this EP (Revision 0).
 - Woodside confirmed the latest version of the EP has been updated to include WA-63-R in Table 3-1, as it was inadvertently omitted from this table in Revision 0.
 - Woodside noted the PAP will be carried out under an access Authority which authorises an existing Petroleum Title Holder to carry out petroleum exploration or recovery operations, other than drilling a well, outside of the boundary of their existing titles.
 - Woodside advised the Activity Source Area and Operational Area show a buffer around the Woodside-operated Title(s) to enable full imagery and understanding of the entire Scarborough plus Jupiter reservoirs, which were not included in the original surveys.
 - Woodside referred to Section 3.4.1 of the publicly available EP (Revision 0), referencing the definition of the Activity Source Area.

- Woodside advised discharge of the seismic source during vessel run ins, run outs, soft starts and full fold seismic data acquisition will occur in the Activity Source Area. Seismic source testing will also occur in the Activity Source Area. The seismic source will not be discharged within this buffer.
- Woodside referred to Section 3.4.2 of the EP (Revision 0), referencing the definition of the Operational Area. The seismic source will not be discharged within this buffer.
- Regarding underwater noise, Woodside advised the impacts of underwater noise generated by the seismic survey equipment are assessed in the EP Section 6.5.3 and Section 6.5.4 for vessels (Revision 0).
- Woodside advised the impact assessments use peer reviewed literature and scientific studies, supported by activity specific underwater sound program modelling.
- Woodside advised the impact assessments consider a range of receptor groups and provided a list of example groups.
- The impact assessments determined highest potential consequence for these receptors to be 'D' (Minor, short-term impact) for noise from survey equipment and 'F' (No Lasting Effect, localised impact not significant to environmental receptors) for noise from project vessels.
- Woodside referenced a list of controls in the EP (Section 6.5.3, Revision 0) to manage risk to an ALARP and acceptable level.
- Woodside referenced the additional control (C 4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the EP.
- Regarding pygmy blue whales, Woodside provided information about the Active Source and Operational areas of the Scarborough 4D MSS being outside the migration BIA, and accordingly, the likelihood of encountering the pygmy blue whale and other cetaceans is expected to be low.
- The EP includes application of the EPBC Act Policy Statement 2.1 Part B.6 – Adaptive measures to minimise the potential impacts to pygmy blue whales from seismic noise, which will be triggered if encounters with pygmy blue whales are more frequent than suspected.
- Woodside referred to Section 6.6.6 of the EP (Revision 0) which assesses the risk of accidental collision between project vessels and marine fauna, including PBWs.
- Regarding impacts on zooplankton and the marine food chain, Woodside confirmed that scientific studies and modelling have been used to assess and ensure an ALARP and acceptable approach to activities.
- Further to Woodside's response in it the meeting, Woodside provided confirmation that the risk assessments in the EP conclude that impacts to zooplankton are likely to be localised (>100 m from the seismic source) and localised changes in zooplankton abundance are likely to be replenished and indistinguishable from natural levels and distributions within hours of the seismic vessel passing.
- Woodside referred to Section 6 of the EP (Revision 0), particularly 6.6.2 Routine Acoustic Emissions from Project Vessels and 6.6.5 Routine Discharges, which consider the potential impacts to zooplankton in the risk/impact assessments.
- Regarding Whale shark and vessel strike risk due to vessel speeds over 10 knots, Woodside confirmed the constant maintained speed of the seismic survey vessel (upper speed of 5 knots). This largely also dictates the speed of both the escorting support and chase vessel. Woodside advised that the vessels also adopt a go-slow buffer around marine fauna as per the EPBC Regulations - Part 8 Division 8.1 Interacting with cetaceans (C14.1).
- Woodside advised the PAP Operational Area does not overlap with any known foraging, feeding or related areas for whale sharks. The nearest BIA is 136 km south-east from the Operational Area.
- Woodside referred to Section 6.7.6 of the EP (revision 0) which assesses the risk of vessel collision or entanglement with marine fauna. While contact with whale sharks is not considered credible as part of this risk assessment, the EP does require implementation of Control 14.1 which includes the requirement that "vessels will not travel faster than eight knots within 250m of whale shark and not allow the vessel to approach closer than 30m of a whale shark.
- Regarding light emissions and assessments undertaken, Woodside referred to Section 6.5.7 (Revision 0) of the EP which considers Routine Light Emissions associated with External Lighting on Project Vessels.
- Woodside advised in the latest revision of the EP, receptors that have important habitat within a 20km radius of the Operational Area were considered as part of the impact assessment, based on recommendations of the Natural Light Pollution Guideline for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds. The impact assessment determined that light emissions from project vessels will not result in an impact greater than localised and temporary disturbance to marine fauna in the vicinity of the Operational Area, with no lasting effect to any species.
- Regarding community consultation, Woodside advised that consultation requirements as set out in Reg 11A of the Environmental Regulations have been complied with in relation to the consultation process for EPs Woodside detailed during its consultation meeting with SNTSG on 13 October 2022.
- Where feedback is received which informs Woodside of new risks or measures that it may take to mitigate the potential adverse environmental impacts from the PAP, Woodside incorporates this feedback into the EP, and where appropriate will introduce additional controls to ensure risks are managed to an ALARP and an acceptable level.
- Woodside confirmed that the PAP of the EP remains the same as what is included in the Consultation Information Sheets. Woodside advised that after publishing to the NOPSEMA website, EPs may change whilst under assessment prior to the final EP being accepted. Following the initial public comments period, an additional round of stakeholder Consultation Information Sheets and advertisements in local publications were issued during the development of the EP.
- Woodside advised it has undertaken extensive consultation with relevant Traditional Owners and Traditional Owner representative groups with respect to the proposed activities.
- Woodside confirmed the engagement included archaeological and ethnographic surveys, which have informed the Scarborough EPs.
- Woodside confirmed it has not undertaken any of the activities which are subject of environmental approvals which are currently under assessment.
- Regarding consistency with existing conservation plans or ecological principles, Woodside confirmed the PAP is carried out in a manner consistent with the principles of ecological sustainable development.
- Woodside advised it confirmed with SNTSG during the consultation meeting on 13 October 2022 that proposed activities are consistent with the Blue Whale Conservation Management Plan.
- Woodside also confirmed that Table 6-21 and Demonstration of Acceptability in Section 6.5.3 in the EP (Revision 0) provides the assessment of the relevant activities against the Blue Whale Conservation Management Plan.
- Regarding independence, Woodside confirmed the experience of the participants in the Environmental Risk and Impact Identification Workshop, which included external environmental consultants supporting the EP development. Woodside referred to Table 2-3 of the EP (Revision 0) for a summary of duration for identifying environmental risk and impacts.
- Regarding responsibility for determining what is reasonably practicable and ties to Woodside, Woodside confirmed the details are provided in Sections 2.2, 2.3 and 2.7.2 of the EP (Revision 0).
- Regarding emissions and ecosystem impacts, Woodside advised that concerns relating to carbon and the impact on climate change from Scarborough gas are not relevant to the EP. The EP assesses both direct and indirect impacts and risks associated with the PAP, having regard for the nature and scale of the PAP.
- Woodside also advised the extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the EP, therefore indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered those of the PAP for the EP but may be evaluated in other Scarborough EPs as appropriate.
- Woodside also confirmed that Section 6.7 of the EP (Revision 0) Recovery Plan and Threat Abatement Plan Assessment describes the assessment that Woodside has undertaken to demonstrate that the PAP is not inconsistent with any recovery or threat abatement plans. Woodside referred to Table 6-19 for more information.
- Woodside advised that the various external comments provided by SNTSG are not applicable to the activity which is the subject of the EP.
- Regarding ecosystem impacts, Woodside advised that impacts to all relevant ecological parameters are considered in the risk/impact assessments in Section 6 of the EP (Revision 0).
- Woodside advised the deep-water environment surveys are not relevant to the EP, and information in the EP is drawn from Bryce et al, 2015.
- Woodside referred to Section 4.5 (Revision 0) of the EP for information on the habitats and biological communities in the Operational Area.

<ul style="list-style-type: none"> ▪ Woodside referred to Sections 6.5.3 and 6.5.4 of the EP (Revision 0) which contain an ALARP assessment of the controls to reduce seismic and vessel noise. Regarding seismic activity Woodside referred to the ALARP assessments in Section 6 of the EP (Revision 0) and several previous responses provided above. ▪ Regarding the activity timing, Woodside confirmed that as advised in the consultation meeting on 13 October 2022, it plans to undertake the activity as soon as possible, following regulator acceptance. ▪ Regarding cyclone risk and consultation, Woodside referred to its previous responses, as well as Section 7.12 Severe Weather Preparation of the EP (Revision 0). ▪ Woodside referred to Table 6-7 of the EP (Revision 0) for result from the animal modelling. ▪ Regarding seismic blasting, Woodside referred to Section 6.5.3 of the EP (Revision 0). 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside assessed the feedback on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate.</p> <p>Woodside has assessed claims and objections raised on the SNTSG public website that cover topics relevant to the proposed activity, where appropriate and provided responses to SNTSG (shown above).</p> <p>Woodside has provided specific information from the EP to address feedback, objections and claims, as well as Woodside's consultation approach and methodology to identify relevant persons (see Section 5.7).</p> <p>No amendments have been made to the EP in relation to any of the feedback, objections or claims raised. Woodside has provided responses to feedback received as shown above.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has consulted SNTSG in the course of preparing this EP. Woodside has assessed the claims or objections raised by SNTSG. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on SNTSG's functions, interests or activities.</p>
<p>-Summary of Feedback, Objection or Claim</p> <p>Following a briefing with Woodside, SNTSG has provided feedback, objections and claims relating to:</p> <ul style="list-style-type: none"> • Assessment of climate change from activity • Rock art and Aboriginal cultural heritage • Purpose of the seismic survey (use of the 2004 data) • Activity timing • Activity location • Underwater noise • Pygmy blue whales • Impacts of cyclones on the proposed activity and union consultation • Impacts on zooplankton • Whale shark and vessel strike risk • Light emissions • Community consultation • Consistency with existing conservation plans and ecological principles • Independence • Emissions • Lighting • Ecosystem impacts • Seismic activity 	<p>Australian Marine Conservation Society (AMCS)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> • On 16 September 2022 Woodside emailed AMCS advising of the proposed activity and provided a Consultation Information Sheet. • Woodside also provided an attached statement of response to claims and objections raised by topic on the AMCS public website relevant to the proposed activity. • Woodside extended an opportunity to meet to discuss the proposed activity. • On 23 September 2022, Woodside followed up with AMCS via email. • On 10 October 2022, Woodside followed up with AMCS via email and confirmed no response had been received. • On 11 October 2022, AMCS emailed Woodside and advised that it was unable to make a submission before 30 September 2022 due to the large number of consultations it is involved with and needs to prioritise its limited resources at this time. AMCS requested for Woodside to continue to send notifications and reminders of its consultations. 	<p>Environment Plan Controls</p> <p>Woodside has consulted SNTSG in the course of preparing this EP. Woodside has assessed the claims or objections raised by SNTSG. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on SNTSG's functions, interests or activities.</p>

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside has assessed claims and objections raised on the AMCS public website that cover topics relevant to the proposed activity, where appropriate and provided responses to AMCS (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Sea Shepherd Australia (SSA)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation: <ul style="list-style-type: none"> • On 16 September 2022, Woodside emailed SSA advising of the proposed activity and provided a Consultation Information Sheet. • Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the SSA public website. • Woodside extended an opportunity to meet to discuss the proposed activity. • On 23 September 2022, Woodside followed up with SSA via email. • On 10 October 2022, Woodside followed up with SSA via email and confirmed no response had been received. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside has assessed claims and objections raised on the AMCS public website that cover topics relevant to the proposed activity, where appropriate and provided responses to AMCS (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Other		
and/or, and/or and Save Our Songlines		

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.

Summary of information provided and record of consultation:

Historical Engagement

2018 – September 2022

Woodside has engaged with the Ngarluma and Mardudhunera communities on the Scarborough project since 2018 through their representative organisations including Murujuga Aboriginal Corporation, Yaburara and Coastal Mardudhunera Aboriginal Corporation, Wirrawandi Aboriginal Corporation and Ngarluma Aboriginal Corporation. During these two-way discussions, in three years leading up to November 2021, Woodside was not made aware of any specific concerns of [REDACTED] (Mardudhunera Traditional Owners) and [REDACTED] (Ngarluma Traditional Owner) around the Scarborough Project. The first time Woodside became aware of these concerns was via a number of public statements on Save Our Songlines websites and social media (November 2021).

- After seeing the concerns, Woodside has met or attempted to meet with individuals involved in Save Our Songlines to discuss the Scarborough project area in other capacities on numerous occasions, including:
 - On 15 December 2021, a meeting was held with MAC Board and Circle of Elders, including [REDACTED] to provide a project overview of Scarborough and Pluto Train 2 projects at the MAC office in Dampier.
 - On 23 March 2022, Woodside received an email from [REDACTED] on behalf of [REDACTED] and [REDACTED] which contained an open letter signed by several Traditional Custodians requesting a halt to progress on the Scarborough Project.
 - An online meeting with [REDACTED] and [REDACTED] was arranged for 24 March 2022 but did not proceed due to technical issues.
 - On 24 March 2022, Woodside emailed [REDACTED] and Save Our Songlines relating to an attempted virtual meeting on 24 March 2022:
 - Woodside noted that despite its representatives being online and waiting for 35 minutes, the meeting did not proceed due to technical issues.
 - Woodside advised that it remained keen to understand Traditional Custodian concerns, including those matters that [REDACTED] and Save Our Songlines have set out, and that Woodside remained available to meet.
 - On 24 March 2022, [REDACTED] and Save Our Songlines emailed Woodside to advise that:
 - They were waiting to join the virtual meeting but there was no response.
 - They were disappointed at this outcome and hoped to have a more formal meeting in times to come.
 - Emails exchanged later that day extended the offer to hold further meetings. By this stage, there had been four attempts by Woodside to meet and discuss these issues with [REDACTED]. This is in addition to the previous three years of consultation with Traditional Owner representative groups of which [REDACTED] were members.
 - On 6 June 2022, some seven months after Save Our Songlines had launched its public campaign on social media, [REDACTED] and Save Our Songlines emailed Woodside and attached a letter regarding consulting NOPSEMA assessment of Scarborough offshore gas field development. The letter summarised the following claims and objections relating to the broader Scarborough activities as follows:
 - We assert our rights to be consulted as 'relevant persons' in relation to cultural heritage impacts of the Scarborough gas development according to the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009;
 - Given the lack of previous assessment of cultural heritage impacts and the significant uncertainties regarding these impacts a precautionary approach must be taken according to the ESD Principles in Section 3A of the EPBC Act.
 - Direct and indirect impacts on cultural heritage must be assessed now, and for all stages of the Scarborough development according to Section 527E of the Environmental Protection and Biodiversity Conservation (EPBC) Act and the EPBC Act Indirect Consequences Policy.
 - In order to comply with requirements to consult under the regulations, disclosure of certain information is required from Woodside.
 - Woodside's own policy, the UNDRIIP and other frameworks require that Traditional Owners are provided with the right of free, prior and informed consent regarding any cultural heritage impacts.
 - The Murujuga Aboriginal Corporation does not represent the interests of Traditional Owners seeking to protect cultural heritage and Woodside's limited consultation with MAC does not satisfy the requirement for free, prior and informed consent for cultural heritage impacts, or the requirements of 'relevant person' consultation according to the above regulations.
 - After consulting with the correspondence was an open letter signed by several Traditional Custodians requesting (among other things) that further investment on project on Murujuga be withheld and that any further investments decisions on the Scarborough Project be paused. The letter was titled 'Open letter from Traditional Owners and Custodians of Murujuga concerning the proposed Woodside Scarborough gas development'.
 - On 22 July 2022, Woodside sent [REDACTED] and Save Our Songlines a letter regarding this EP.
 - Throughout July and August 2022, Ngarluma and Yindjibarndi Foundation Ltd (NYFL) offered to engage [REDACTED] and [REDACTED] and to facilitate a series of up to three meetings between Woodside and [REDACTED] and [REDACTED] to discuss Scarborough and Pluto Train 2 project and activities. Woodside pursued this opportunity, including outlining payment for [REDACTED] and [REDACTED] time, but it did not progress, due to lack of responses from [REDACTED] and [REDACTED]
 - On 2 August 2022, Woodside provided acceptance in writing of NYFL offer to facilitate Save our Songlines meetings.
 - On 26 September 2022, [REDACTED] and Save Our Songlines emailed a letter to NOPSEMA regarding a number of Scarborough EPs, including this one:
 - [REDACTED] and Save Our Songlines raised several claims relating to Woodside's consultation requirements under the Regulations.
 - [REDACTED] and Save Our Songlines raised that they have functions interests and activities within the EMBA's of the Scarborough EPs (including this EP) which might be directly affected by the proposed activity.
 - [REDACTED] and Save Our Songlines requested NOPSEMA to refrain from accepting the Scarborough EPs (not this EP) until Woodside had properly complied with Reg 11A in relation to its functions, interests and activities.
 - On 29 September 2022, Woodside emailed [REDACTED] and Save Our Songlines:
 - Woodside requested a meeting to share information in relation to the Scarborough Gas Project. Woodside requested to hold this meeting prior to 10 October 2022.
 - Woodside advised it welcomed the opportunity to meet to discuss the matters raised in the letters of 6 June 2022 and 29 September 2022, to share information in relation to the Scarborough Gas Project and demonstrate how items raised in the correspondence have been addressed in the relevant environment plans.
 - Woodside proposed that the meeting would be attended by subject matter experts and project personnel as required to answer any questions.
 - On 6 October 2022, Woodside followed up with [REDACTED] and Save Our Songlines via email and phone / voicemail.
 - On 7 October 2022, [REDACTED] and Save Our Songlines responded to Woodside via phone to arrange a suitable date and time.
 - On 7 October 2022, Woodside and [REDACTED] and Save Our Songlines discussed arrangements via phone to meet on 11 October 2022.
 - On 7 October 2022, [REDACTED] and Save Our Songlines contacted Woodside via phone to advise that a colleague would be in touch to set up the meeting. [REDACTED] and Save Our Songlines could not confirm if the 11 October 2022 meeting was proceeding as planned.
 - On 10 October 2022, Woodside emailed [REDACTED] and Save Our Songlines noting it had not received any further contact confirmation of the 11 October 2022 consultation meeting. Woodside advised it was still ready and available to proceed with a meeting.

- On 11 October 2022, Woodside sent personnel to Karratha in preparation for the meeting and followed up with [REDACTED] and Save Our Songlines via phone and SMS.
- On 11 October, [REDACTED] and Save Our Songlines advised Woodside via SMS that it was awaiting confirmation from its lawyers regarding the proposed meeting.
 - Woodside did not receive further contact and this meeting did not proceed.
 - Woodside received correspondence from [REDACTED] and Save Our Songlines via NOPSEMA which was directed to Woodside and dated 8 November 2022:
 - The correspondence acknowledged Woodside's invitation to meet to discuss the Scarborough Environment Plans and proposed some alternative meeting dates.
 - The correspondence referenced prior correspondence between Woodside and [REDACTED] and Save Our Songlines.
 - The correspondence referenced a number of other related Scarborough Gas Project Environment Plans.
 - On 22 November 2022, Woodside emailed [REDACTED] and Save Our Songlines:
 - Woodside acknowledged the letter addressed to Woodside on 8 November 2022 that was passed on via NOPSEMA.
 - Woodside confirmed its availability to meet on Tuesday 29 November 2022.
- On 8 November 2022, [REDACTED] and Save Our Songlines sent a letter to Woodside in relation to the Scarborough gas project EP meetings request including this EP.
- On 22 November 2022, Woodside emailed [REDACTED] and Save Our Songlines regarding 8 November 2022 correspondence.
- On 24 November 2022, [REDACTED] and Save Our Songlines provided correspondence to Woodside regarding the proposed meeting date. The correspondence sought to clarify the intended scope and purpose of the meeting before setting a date. In particular [REDACTED] and Save Our Songlines sought confirmation on the following items:
 - Acknowledgement of relevant person status
 - Provision of necessary information
 - Purpose of meeting
- On 2 December 2022, Woodside emailed [REDACTED] and Save Our Songlines and included responses to address the items raised on 24 November 2022, where appropriate. Woodside reiterated its availability to meet and provided an option for any date in December 2022.
 - Woodside reiterated that it is open to continue consulting, receiving feedback and discussing concerns in relation to Woodside's Scarborough Environment Plans (EPs). Consultation is ongoing and feedback will continue to be accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.
 - Woodside confirmed its arrangements to meet and consult that have been ongoing since November 2021, and it remains open to continue consulting in relation to the Scarborough EPs.
 - Woodside advised it is available to meet with [REDACTED] and Save Our Songlines on any date in December 2022 in Karratha. Woodside requested confirmation of availability to meet by 9 December 2022.
 - Woodside provided a link to the Consultation Information Sheet, which has been available on Woodside's website since September 2022, invited comments on the proposed activities to be provided before 21 October 2022. This EP is in development, and we are seeking your feedback to assist in its preparation.
 - Woodside noted there has been ample time and information available to inform feedback on our proposed Scarborough EPs. Woodside requested [REDACTED] and Save Our Songlines provide feedback no later than at the proposed meeting in December 2022.
 - Woodside noted the letter dated 24 November 2022 makes reference to arrangements which would enable [REDACTED] and Save Our Songlines to share relevant information such as matters that are restricted to women or men only. Woodside requested for [REDACTED] and Save Our Songlines to confirm what arrangements are required to enable them to share this information by 9 December 2022.
- Despite Woodside being available to meet any time in December and the date of December 9 being suggested, there was no response from [REDACTED] and Save Our Songlines so a meeting could not proceed.
- On 4 January 2023, Woodside emailed [REDACTED] and Save Our Songlines to follow-up on its meeting request (Appendix F, reference 1.105). Woodside reiterated its availability to meet and provided an option for any date in January 2023.
- On 13 January 2023, [REDACTED] and Save Our Songlines emailed Woodside:
 - [REDACTED] and Save Our Songlines confirmed it would like to meet with Woodside, but reiterated its requests contained within its 24 November 2022 correspondence.
 - [REDACTED] and Save Our Songlines stated it can advise of its availability for a meeting once the information requested above is provided.
- On 19 January 2023, Woodside emailed [REDACTED] and Save Our Songlines. Woodside included the following responses to address the items raised, where appropriate:
 - Woodside reiterated it is open to continue consulting with [REDACTED] and Save Our Songlines, receiving feedback and discussing their concerns in relation to Woodside's Scarborough Environment Plans (EPs) in Commonwealth and State waters (collectively referred to as the Scarborough EPs).
 - That consultation on the Scarborough EPs began when Woodside provided [REDACTED] and Save Our Songlines with consultation information on the Scarborough EPs.
 - That Woodside has made every effort to meet with [REDACTED] and Save Our Songlines to understand their claim of relevance and to develop a comprehensive understanding of potential impacts to their functions, interests or activities.
 - That it has been trying to arrange a meeting with [REDACTED] and Save Our Songlines since November 2021 to discuss the Scarborough EPs, including a representative travelling to Karratha for a planned meeting on 11 October 2022 and making representatives available for a meeting on 29 November 2022.
- Woodside reiterated its availability to meet and provided an option for any date in January or early February 2023.
- On 8 February 2023, Woodside was copied into correspondence sent from the Environmental Defender's Office (EDO) to the WA State Minister for Mines and Petroleum regarding a separate Environment Plan under State Regulations. Copies of previous correspondence between Woodside and [REDACTED] and Save Our Songlines were attached to the email.
- On 8 February 2023, the EDO (acting on behalf of SOS) emailed Woodside and provided a proposed date of the w/c 13 and 20 March 2023 for the meeting with its client.
- On 15 February 2023, Woodside emailed [REDACTED] and Save Our Songlines. Woodside reiterated its availability to meet and, based on dates suggested within the 8 February correspondence, provided [REDACTED] and Save Our Songlines with confirmation it was available to meet on the suggested dates in March 2023.
- On 24 February 2023 Woodside sent [REDACTED] and Save Our Songlines a follow up email. Woodside reiterated its availability to meet.
- On 24 February 2023 the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside and advised its client was available to meet on 13 and 14 March 2023.
- On 28 February 2023 the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside to follow up on the request to secure a meeting.
- On 1 March 2023 Woodside emailed [REDACTED] and Save Our Songlines (and CC to EDO) to propose the meeting time and location for 14 March 2023.
- On 7 March 2023 the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside to confirm the meeting time and location for 14 March 2023.

- On 8 March 2023 Woodside emailed the EDO, [REDACTED] and Save Our Songlines with a proposed agenda for the 14 March 2023 meeting and requested the stakeholder advise if there are any particular issues they wish to discuss during the meeting.
- On 10 March 2023, Woodside emailed EDO, [REDACTED] and Save Our Songlines with further logistic and meeting protocol details for the proposed meeting on 14 March 2023.
- On 14 March 2023, Woodside met with EDO, [REDACTED] and Save Our Songlines on-country and discussed the proposed activity. This meeting represented the first time Woodside and [REDACTED] and Save Our Songlines had met in person since the initial identification of Save Our Songlines in November 2021.
- Woodside provided an overview of the Scarborough activities (Seismic EP, Subsea EP, D&C EP, SITI EP (Ch and State)).
- Feedback from [REDACTED] and Save Our Songlines (at the on-Country meeting):
- [REDACTED] and Save Our Songlines told Woodside that the proposed activities gave them a sick feeling and the activities should be stopped. [REDACTED] and Save Our Songlines also informed Woodside that, in their view, there is nothing that can be done by Woodside to progress with the proposed Scarborough activities in a way that could minimise impact to [REDACTED] and Save Our Songlines' functions, activities and interests or is respectful to its culture and country.
- Woodside Response (at the on-Country meeting):
- Woodside agreed not to share cultural details which were shared with at the 14 March 2023 meeting.
- Woodside provided responses to specific actions taken during the meeting.
- Woodside provided background information on the "why" behind the Scarborough activities.
- Woodside's Scarborough Gas Project helps play a role in the global energy transition, helping neighbouring Asian countries take action on emissions reduction and advised there is further information on Woodside's website.
- Woodside to check with MAC whether MAC's ethnographic survey can be shared with [REDACTED] and Save Our Songlines –
- The ethnographic survey is held by MAC and Woodside does not have permission to share it.
- Confirm fracking in relation to the Scarborough activities – there is no fracking to be undertaken as part of the proposed Scarborough activities.
- On 16 March 2023, Woodside emailed EDO, [REDACTED] and Save Our Songlines to advise that:
 - It appreciated the request for Woodside to attend the meeting with open hearts, deep listening and respectful conversation and that it would intend to continue this approach to engagement.
 - Woodside's consultation process is ongoing through the environmental approval process and when an activity is being performed and that Woodside looks forward to continuing its discussions with [REDACTED] and Save Our Songlines in the future.
 - Woodside is open to consulting further with [REDACTED] and Save Our Songlines on the proposed Scarborough activities and are open to the continuing engagements regarding the Scarborough activities.
- On 17 March 2023, Woodside emailed [REDACTED] and Save Our Songlines acknowledging SOS's correspondence to Woodside dated 6 June 2022, 26 September 2022 and 24 November 2022 and the discussion with Woodside on 14 March 2023. Woodside included an attachment containing responses to relevant objections, claim and additional information raised in the correspondence relating to the activities the subject of this EP. Woodside stated:
 - Woodside has conducted an ethnographic survey to support the development of EPs for the Scarborough Project which have not identified any heritage places, objects or values which will be impacted by the activities covered by the this EP.
 - None of Woodside's agreements with Traditional Custodians include "gag clauses" or restrictions on voicing opinions on our projects.
 - Re the principles of FPIC Woodside is guided by UNDRIIP under our Indigenous Communities Policy and has consulted representative institutions including MAC for a number of years.
 - Woodside has made several attempts since November 2021 to engage with Save Our Songlines, [REDACTED] and [REDACTED] with a meeting held on Tuesday 14 March 2023. Woodside is open to receiving feedback.
 - Re cultural heritage impacts, concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Seismic EP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for this EP but may be evaluated in other Scarborough EP's as appropriate.
 - Re impacts on rock art through pollution, emissions from the activities covered by the Seismic EP are of a scale and physical remoteness from Murujuga's rock art that no credible impact pathway is foreseen. The activities covered by the Seismic EP are located ~374 km away from Murujuga.
 - Re the proposed removal of rock art from the Pardaman site, Woodside stated it is not appropriate for Woodside's EP's to address or seek to regulate the activities of third parties progressing separate projects.
 - Woodside has resourced Traditional Custodian representative institutions to access relevant information and independent expert advice so that they are enabled to provide informed and considered feedback on the broader Scarborough activities.
 - A number of documents containing cultural heritage information, including heritage assessments, contain the intellectual property of Traditional Custodians or sensitive information that may be culturally restricted. For these reasons, Woodside does not disclose this information. This information is held by representative institutions and may be disclosed by them where they consider in appropriate to do so. The Scarborough Project Cultural Heritage Management Plan is a publicly available document and can be found on Woodside's website.
 - Woodside continues to consult with MAC on all relevant aspects of this EP prior to and during the execution of activities.
 - Re impacts and risks on Aboriginal heritage sites on and around Murujuga, Woodside has undertaken archaeological assessments and ethnographic surveys to identify cultural heritage that may be impacted by Scarborough activities. These works have not identified any heritage places, objects or values which will be impacted by the activities covered by the Seismic EP.
 - Woodside considers the time it has provided to consider information prior to meetings to be more than suitable to inform SOS's feedback on Woodside's proposed Scarborough EPs.
 - We confirm as per Woodside's ongoing consultation approach, feedback and comments received continue to be assessed and responded to, as required, through the life of an EP, including during EP assessment and throughout the duration of the accepted EP, in accordance with the intended outcome of consultation.
- On 24 March 2023, the EDO (acting on behalf of [REDACTED] and Save Our Songlines) provided a letter to Woodside which copied NOPSEMA, DMIRS and the WA Minister for Mines and Petroleum:
 - The letter detailed a response to the 14 March 2023 meeting and Woodside's 16 March 2023 email, and covered a range of Scarborough EPs, including this proposed activity.
 - The EDO noted its client's concerns relating to:
 - The summary of the meeting provided by Woodside
 - clarification of its client's position
 - communication of relevant person status
 - Acknowledgement of response to questions arising at the meeting of 14 March 2023.
 - The letter noted that the EDO's clients would review the consultation information provided, and that it anticipates its clients would require approximately six weeks to do this.

- The letter requested Woodside not submit the draft environment plan until consultation was complete.
- On 29 March 2023 Woodside emailed the EDO, [REDACTED] and Save Our Songlines (CC to NOPSEMA) in response to the 24 March 2023 letter. Woodside reiterated its responses to topics raised during the meeting and in previous correspondence, relevant to the proposed activity. The response included the following responses which are summarised as follows:
 - Additional or new information
 - Woodside advised it has a process in place for the life of an EP that allows the EP to be updated to include additional or new information or feedback that is received after an EP is submitted. This is done through a "Management of Knowledge" process. This means that feedback or information provide in future meetings can still be taken into account and, where appropriate, can be incorporated in the EP during the life of the activity.
 - Woodside advised that following the meeting, based on the information provided, no updates were required to the EP via the Management of Knowledge process.
 - Functions, interests and activities
 - Woodside acknowledged that it had been advised that [REDACTED] and Save our Songlines' functions interests and activities are distinct from those of MAC and that it was interested to learn about this further.
 - In response to a request for the ethnographic survey undertaken by MAC, Woodside reiterated that it has no authority to provide this information. Woodside suggested that [REDACTED] may have contacts at MAC to request a copy of that survey.
 - Woodside advised that as to [REDACTED] and Save Our Songlines' functions, interests and activities (and those of Save Our Songlines), it continues to invite these to be shared with Woodside so it can consider the likely impacts and risks of the EP activities on these functions, interests and activities and what Woodside can do to lessen or avoid those impacts.
 - Woodside confirmed that as [REDACTED] and Save Our Songlines' were not prepared to share some information with Woodside, it remains open to hearing from them when this is known, and it is ready to be shared.
 - Minimising impacts to functions, interests and activities
 - Woodside reshared its interpretation of the take-aways from the meeting in relation to:
 - Underwater activities
 - Greenhouse gas emissions.
 - In the meeting, Woodside provided an overview of the Scarborough Project and potential impacts of activities on whales.
 - Emissions from the activities covered by the Commonwealth EPs are of a scale that no credible impact pathway is foreseen. This has been the subject of separate correspondence.
 - Industrialisation of Murujuga
 - This subject has been addressed in separate correspondence in which Woodside has set out its understanding of the history of the Burrup and the industrial agreements involved. Woodside has also provided responses which are along the lines that no credible impact pathway is foreseen from the activities covered by the Commonwealth EPs which could damage rock art and heritage sites and that no cultural impact to future access to sites of cultural and spiritual significance is foreseen.
 - Detail of EPs and information accessed and provided.
 - The meeting provided an overview of the Scarborough Project and followed volumes of previous correspondence on the Scarborough Project. Previous correspondence indicates that a large volume of information on the Scarborough Project has been accessed, read and thought through. The correspondence shows an informed and thorough understanding of the various Scarborough activities and the Scarborough Project.
 - Consultation in general
 - Woodside advised it has continued to consult with [REDACTED] and Save Our Songlines' and continues to invite further consultation.
 - Relevant persons
 - Woodside advised that the Commonwealth approval process requires Woodside to consult with "relevant persons".
 - Woodside has previously explained the approval process relating to the concept of "relevant persons" and noted that, at the relevant time consultations are included under a category of "relevant persons" in EPs. Woodside generally applies this category at a stage when they are trying to understand more about a person's functions, interests and activities and also the impacts of Woodside's activities on them.
 - Woodside reiterated that there is no need for it to categorise persons as relevant in order to consult with them.
 - Ongoing consultation
 - Woodside advised that once an EP is accepted, Woodside continues ongoing consultations with relevant persons. is open to continuing consultation to understand how the proposed Commonwealth EP activities relevantly affect [REDACTED] and Save Our Songlines.
 - Further consultation
 - Woodside noted that in [REDACTED] and Save Our Songlines' correspondence, it would like to organise another meeting and will require approximately six weeks to read into materials and prepare for a meeting.
 - Woodside requested for [REDACTED] and Save Our Songlines' to advise its preferred times for the next meeting, noting the time taken to arrange the previous meeting.
 - Woodside advised it is available to meet in the week commencing 8 May 2023 or earlier.
 - On 6 April 2023, the EDO sent a letter to NOPSEMA and copied Woodside with a subject of "Relevant interested person" consultation requirements – Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan (sic)". The letter suggests that consultation with the EDO's clients [REDACTED] ([REDACTED]) and Save Our Songlines (SOS) has not been completed and therefore this EP should not be accepted.
 - On 17 April 2023, Woodside responded by email to a letter from the EDO dated 6 April 2023 addressed to NOPSEMA and copied to Woodside. Woodside stated:
 - The letter sent by EDO dated 6 April 2023 suggests that consultation with the EDO's clients [REDACTED] ([REDACTED]), [REDACTED] ([REDACTED]) and Save Our Songlines (SOS) has not been completed and therefore this EP should not be accepted by NOPSEMA.
 - Woodside provided notes giving additional context in relation to it raised in the letter, including in relation to Woodside's repeated and protracted attempts to meet, engage and consult with [REDACTED] and SOS on the Scarborough Project, including this EP.
 - Woodside confirmed the EP was submitted for approval on the grounds it met the regulations and that the underpinning consultation effort is documented within the EP, demonstrating provision of sufficient information, time and opportunity to consult over an extended period.
 - Woodside reiterated the process for consultation remains open post EP approval and that it has consistently offered an open invitation to [REDACTED] and SOS to provide feedback to allow Woodside to consider the potential impacts and risks of the activities on functions, interests and activities and to provide input on things Woodside can do to mitigate those potential impacts and risks.
 - An attachment of 5 pages sent with this response to NOPSEMA sets out the history of Woodside's extensive engagements with Alex, [REDACTED] and SOS. It states that since June 2018, Woodside has undertaken 82 substantial engagements relating to the Scarborough Project including 32 meetings with Traditional Custodians and their representatives.

- The letter went on to provide further context and highlighted relevant engagements with [REDACTED] and SOS, and stated Woodside's position i.e. having regard to all of the circumstances of the consultation undertaken with [REDACTED] and SOS, and in light of the concepts of "reasonable time", "reasonable diligence", a consultation obligation that "must be capable of practical and reasonable discharge ... that must be capable of performance", NOPSEMA can be reasonably satisfied that an appropriate level of consultation has taken place with [REDACTED] and SOS.
- It further stated that a previous EP which included the seismic activity proposed to be undertaken in June 2019 and accepted by NOPSEMA in December 2019. The activity was unable to be commenced because of COVID and that for the current EP, the Activity description, location, risks and impacts and controls have substantially remained the same through the various re-submissions of the EP that have occurred since October 2021. During the re-submission process, the EP Activity description has, however reduced – for example, the Activity no longer proposes to include use of autonomous ocean bottom seismic nodes.
- Woodside also outlined details about correspondence and the opportunities and invitations Woodside has attempted to provide for consultation to occur and why these have not occurred.
- Woodside closed the letter by stating Woodside would be pleased to discuss the notes contained in this letter and the issues raised in the Letter from EDO with NOPSEMA.
- On 9 May 2023, Woodside emailed [REDACTED] and Save Our Songlines and included responses to relevant objections, clai and additional information raised on 6 June 2022, 26 September 2022 and 24 November 2022.
- Woodside confirmed it has conducted an ethnographic survey to support the development of EPs for the Scarborough Project (Mott 2019, McDonald and Phillips 2021, Nutley 2022a and 2022b). These works have not identified any heritage places, objects or values which will be impacted by the activities covered by the SITI EP. An ethnographic survey determines the cultural values which are associated with a particular area, feature or object. Representatives from the Mardudhunera, Ngarrinma, Yaburara, Yindjibarndi and Wong-Goo-Ti-Oo Peoples—all five indigenous groups represented by MAC—participated in these surveys (Mott 2019, McDonald and Phillips 2021). Participants were not restricted in the types of heritage or other values they were encouraged to identify, but typical results from surveys of this nature might include songlines, ceremonial places such as 'thalu' sites for managing environmental resources, or places where activities such as birthing, initiation or other significant activities are performed.
- Woodside advised Archaeological assessments have been made over the ancient landscape, being the extent of the continental shelf which was previously exposed during human occupation. This includes an Australian-first assessment of the archaeological perspective along the trunkline route conducted with the support and consultation of Traditional Custodians (UJWA 2021). An executive summary is available on Woodside's website at <https://www.woodside.com/docs/default-source/sustainability-documents/indigenous-peoples/cultural-heritage/scarborough-pipeline-cultural-heritage-assessment-exec-summary.pdf>
- Woodside advised it has had all of its submerged heritage work assessed by an expert underwater archaeologist for gaps in our processes (Nutley 2022a), as well as a review of Side Scan Sonar data to confirm whether archaeological sites could be identified on the seabed (Nutley 2022b).
- Woodside advised that Section 4.9.1 of the EP includes a summary of these assessments. The assessments include the relevant areas sufficient to assess the cultural values of the Operational Area for this EP.
- Woodside confirmed None of Woodside's agreements with Traditional Custodians include "gag clauses" or restrictions on voicing opinions on its projects. Woodside has supported Traditional Custodian representative institutions to access relevant information and independent expert advice so that they are enabled to provide informed and considered feedback on the Scarborough project.
- Woodside advised that the principles of Free, Prior and Informed Consent (FPIC) are based in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) where it is envisaged as a communal right of Indigenous communities and secured through consultation with representative institutions utilising traditional decision-making mechanisms such as deferring to MAC's Circle of Elders. Woodside is guided by UNDRIP under its First Nations Communities Policy and has consulted representative institutions including MAC for a number of years.
- Woodside confirmed it has made several attempts since November 2021 to engage with Save Our Songlines, [REDACTED] and [REDACTED] with a meeting held on Tuesday 14 March 2023. Woodside confirmed that Woodside is open to receiving feedback on the SITI EP.
- Woodside confirmed that concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to this EP. This EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program, having regard to the nature and scale of the proposed Petroleum Activities Program.
- Woodside advised the proposed Petroleum Activities Program is outside of the National Heritage Place and the anticipated boundary of the Murujuga Cultural Landscape World Heritage Property.
- Woodside confirmed the extraction of Scarborough gas for onshore processing is not within the scope of the activity described in this EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the Petroleum Activities Program for this EP but may be evaluated in other Scarborough EPs as appropriate.
- Woodside confirmed emissions from the activities covered by this EP are of a scale and physical remoteness from Murujuga's rock art that no credible impact pathway is foreseen. Woodside advised that no rock art will be displaced as a result of the Scarborough Project.
- The activities covered by this EP are located in Commonwealth waters and will have no impact on access to sites of cultural and spiritual significance.
- Woodside advised it has resourced Traditional Custodian representative institutions to access relevant information and independent expert advice so that they are enabled to provide informed and considered feedback on the broader Scarborough activities. A number of documents containing cultural heritage information, including heritage assessments, contain the intellectual property of Traditional Custodians or sensitive information that may be culturally restricted. For these reasons, Woodside does not disclose this information. This information is held by representative institutions and may be disclosed by them where they consider it appropriate to do so.
- Woodside provided a link to the Scarborough Project Cultural Heritage Management Plan which is a publicly available document and can be found at: https://www.woodside.com/docs/default-source/our-business---documents-and-files/burnup-hub---documents-and-files/scarborough---documents-and-files/scarborough-cultural-heritage-management-plan.pdf?srsltid=AfmORpW3e353a_3
- Woodside advised it continues to consult with MAC on all relevant aspects of this EP prior to and during the execution of activities.
- Woodside advised it considers the adequate time and information it has provided, including the meeting on Tuesday 14 March 2023, to be more than suitable to inform feedback on Woodside's proposed Scarborough EPs.
- Woodside confirmed that as per Woodside's ongoing consultation approach, feedback and comments received continue to be assessed and responded to, as required, through the life of an EP, including during EP assessment and throughout the duration of the accepted EP, in accordance with the intended outcome of consultation.
- Woodside reiterated the consultation information sheet has been available on Woodside's website since August 2021 and invited feedback on the proposed activities to be provided before 30 September 2021. Revision 1 of the EP has been available on the NOPSEMA website since 13 January 2022. Woodside re-provided links to both documents.
- On 10 May 2023, the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside to query the date of previous correspondence.
- On 15 May 2023, Woodside emailed the EDO confirming that the May 2023 correspondence refers to emails dated 9 May 2023 with the subject line "RE: Scarborough Environment Plans – Consultation.
- On 1 June 2023, the EDO emailed Woodside confirming [REDACTED] and Save Our Songlines were available to meet in Karratha on Tuesday, 13 June 2023.

<p>Summary of Feedback, Objection or Claim</p> <p>Ms [redacted] and Save Our Songlines have provided requests for further information on the broader Scarborough activities (including the proposed activity) relating to:</p> <ul style="list-style-type: none"> Background information on the Scarborough activities with Ms [redacted] and Save Our Songlines. Confirmation if fracking will be conducted in relation to the Scarborough activities Ms [redacted] and Save Our Songlines have provided feedback, claim and objections on the broader Scarborough activities (including the proposed activity), relating to: <ul style="list-style-type: none"> Consultation requirement in general, including the consultation information and additional information provided by Woodside, as well as responses to questions and topics raised. Ms [redacted] and Save Our Songlines sought to be recognised as relevant persons Impacts from the proposed activity on Ms [redacted] and Save Our Songlines' functions, interests and activities: <ul style="list-style-type: none"> Underwater activities Greenhouse gas emissions Industrialisation of Murujuga Details of EPs and information accessed and provided Ongoing consultation 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has consulted with Ms [redacted] and Save Our Songlines on both the proposed activity and the broader Scarborough project.</p> <p>Following a meeting with Ms [redacted] and Save Our Songlines on 14 March 2023 (and subsequent correspondence from the EDO on 24 March 2023), Woodside has assessed feedback and topics raised relevant to the proposed activity. Feedback has been assessed as it applies to this EP and a summary of responses has been provided to address specific claim and objections raised on the proposed activity, where appropriate.</p> <p>Section 4.10.1 of the EP includes a summary of assessments of relevant areas sufficient to assess the cultural values of the Operational Area for this EP.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has consulted Ms [redacted] and Save our Songlines in the course of preparing this EP. Woodside has assessed the claims or objections raised by Ms [redacted] and Save our Songlines. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on Ms [redacted] and Save our Songlines's functions, interests or activities.</p>
<p>Research institutes and local conservation groups or organisations</p>		
<p>National Energy Resource Australia (NERA) Collaborative Seismic Environment Plan Project (CSEP)</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 28 April 2022, NERA self-identified via email on a separate EP and requested information on the proposed activity. NERA noted that the Operational Area of the proposed activity overlaps with the area outlined in its Collaborative Seismic Environment Plan. On 11 May 2022, Woodside emailed NERA advising of the proposed activity (Appendix F, reference 1.28) and provided a Consultation Information Sheet. Woodside noted to NERA that given the EP is in its final stages of assessment, stakeholder feedback at this time may not be able to be incorporated into the EP but will be considered as necessary. NERA was advised it would be kept informed of any future relevant consultation regarding the activity. On 11 November 2022, Woodside sent an email to NERA in relation to the Scarborough EPs. (Appendix F, reference 1.37) On 22 February 2023, Woodside emailed NERA a reminder that consultation is closing soon (Appendix F, reference 1.90). On 24 February 2023, NERA thanked Woodside for keeping CSEP up to date and confirmed they have no comments and no planned activities for 2023. On 28 February 2023, Woodside emailed and confirmed they will provide NERA with commencement and cessation of activity notifications relating to the proposed activities. On 1 May 2023, NERA emailed Woodside on a separate project advising the Collaborative Seismic EP had been withdrawn and will no longer go ahead. NERA requested that the CSEP be removed from relevant person consultation. On 2 May 2023, Woodside emailed NERA confirming Woodside would remove the CSEP from its relevant person consultation for future EPs. 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>

Table 5-5: Engagement Report with Persons or Organisations Assessed as Not Relevant

Commonwealth Commercial fisheries and representative bodies		
<i>Australian Southern Bluefin Tuna Industry Association (ASBTIA)</i>		
Summary of information provided and record of consultation: <ul style="list-style-type: none"> On 3 February 2023, Woodside emailed ASBTIA on the proposed activity (Appendix F, reference 1.65) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86). 		
<i>Summary of Feedback, Objection or Claim</i>	<i>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</i>	<i>Environment Plan Controls</i>
No feedback, objections or claims received despite follow up.	Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. No additional measures or controls are required.

Tuna Australia

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 3 February 2023, Woodside emailed Tuna Australia on the proposed activity (Appendix F, reference 1.65) and provided a Consultation Information Sheet and fisheries map.
- On 3 February 2023, Tuna Australia responded and requested remuneration for consultation.
- On 15 March 2023, Woodside emailed Tuna Australia:
 - Woodside advised that the level of feedback provided by an organisation, if any, is at the person or organisation's discretion.
 - Woodside advised it would be happy to meet with Tuna Australia to provide an overview of our proposed activities, how we develop our environmental plans and the extensive controls we have in place to reduce impacts to as low as reasonably practical (ALARP) and acceptable level.
 - The aim is to provide an efficient and simple way to obtain feedback and to assist in an understanding of Woodside's activities.
- On 15 March 2023, Tuna Australia emailed Woodside:
 - Tuna Australia attached what it described as 'an industry position statement for engaging with energy companies seeking consultation advice from stakeholders on environmental plans and project proposals'. This included:
 - An overview of Tuna Australia's functions, interests and activities as well as the organisation's company objectives.
 - The geographic areas that Tuna Australia represents by membership Statutory Fishing Rights
 - A recommendation that project proponents also engage with the Australian Southern Bluefin Tuna Industry Association for any proposals in the Southern Bluefin Tuna fishing area.
 - The position that Tuna Australia considers itself a 'relevant person' consistent with NOPSEMA guidelines.
 - A request that Tuna Australia be contacted when any proposed activity has the potential to impact vessel navigation, fishing activities, and/or the conservation of fish resources consistent with the Offshore Petroleum and Greenhouse Gas Storage Act 2006.
 - A request for a map from proponents of the proposed activity to determine if its member interests may be affected on a case-by-case basis.
 - A request that where potential effects exist, there is a need for a service agreement. Tuna Australia advised it can no longer coordinate consultation with offshore energy activities on behalf of Tuna Australia's members without a service agreement in place. Tuna Australia requests proponents execute Tuna Australia's services agreement and provide information in a written succinct manner including estimated boundaries for extent of planned activity impacts (i.e. artificial light, noise, discharges etc) as well as activities within the operational area. This advice will be distributed to members and non-members holding SFRs in the Eastern (114 concession holders) and Western (61 concession holders) Tuna and Billfish Fisheries for comment. Information provided would be relevant to tuna and billfish fisheries in the area that may affect vessel navigation, fishing activities, and/or the conservation of fish resources based on the planned aspects of the activity, and proposed control measures to manage impacts.
 - Tuna Australia noted that it wishes to engage constructively with project proponents for all situations where there is potential for conflict with vessel navigation, access to fishing area and/or gear, and the biology of target fish and baitfish. Advice provided can change annually due to the dynamic nature of its fisheries.
 - Tuna Australia encouraged companies requiring advice from its sector to enter into a consultation services agreement with Tuna Australia to support their applications. Noting that Tuna Australia may be able to provide information on vessel navigation, fishing activities and/or the conservation of fish resources that may be affected that is not publicly available and will be an important input to environmental impact and risk assessment processes.
- On 17 May 2023, Woodside emailed Tuna Australia (Appendix F, reference 1.115) thanking it for its position statement and:
 - Noted the level of feedback provided by an organisation, if any, is at the person or organisation's discretion.
 - Woodside does not have an expectation that organisations will provide a report or engage a consultant to engage in consultation or provide feedback on their behalf.
 - Woodside is open to suggestions from Tuna Australia as to ways to improve efficiency and simplicity for feedback so that the process is manageable.
 - Woodside reiterates it would be happy to meet with Tuna Australia to provide an overview of our proposed activities, how we develop our environmental plans and the extensive controls we have in place to reduce impacts to as low as reasonably practical (ALARP) and acceptable level.
- On 17 May 2023, Tuna Australia sent an email to NOPSEMA, and copied in Woodside, regarding Woodside's position on engagement with Tuna Australia. The email stated:
 - When energy companies execute a service agreement with Tuna Australia, this ensures that all Western Tuna and Billfish Fishery (WTBF) and Eastern Tuna and Billfish Fishery concession holders are consulted on environmental plans and responses are provided in a report.
 - Woodside do not have an appreciation of the nature fishing and are more content to receive information to support their environmental plans and proposals free of charge. This is not consistent with their company values.
 - Woodside has failed to recognise the WTBF is a relevant person.
 - WTBF concession holders are very concerned with developments in their fishing zone and have many comments and questions on environmental plans and proposals.
 - Tuna Australia requested that to meet sound consultation principles NOPSEMA stipulate that all environmental plan submissions receive formal advice from Tuna Australia.
- On 26 May 2023, Woodside had a phone call with the Tuna Australia CEO and:
 - Explained that Woodside would like to discuss a path forward following receipt of Tuna Australia's Position Statement across its EP activities, including the activities proposed under this EP.
 - Noted Tuna Australia's correspondence to NOPSEMA and copied to Woodside dated 17 May 2023.
 - Noted Tuna Australia's previous EP consultation feedback that Woodside had responded to with respect to unrelated EPs.
 - Reiterated that Woodside does not expect Tuna Australia to provide a consultation report for each of its EPs and are concerned about this potential misalignment on expectations.
 - Tuna Australia advised it would like to discuss a way forward as woodside suggested and requested Woodside call Tuna on 30 May 2023, which Woodside committed to.

<ul style="list-style-type: none"> On 2 June 2023, Woodside made a follow up phone call to Tuna Australia and left a voicemail covering the following: <ul style="list-style-type: none"> Woodside called Tuna Australia on 2 June 2023 to follow up on phone call on 26 May 2023. Woodside left a message requesting a call back and the opportunity to meet with Tuna Australia to discuss Woodside's portfolio of environment plan activities. Woodside requested the opportunity to discuss options to consult with Tuna Australia and potentially lessen the burden on Tuna Australia for providing feedback on Woodside's EPs. Woodside offered the opportunity to take Tuna Australia through the entire EP portfolio, inclusive of decommissioning, so Tuna Australia could better assess the volume of activities. Woodside reiterated that there was no expectation for Tuna Australia to provide a consultation report on each individual EP, and potentially there is an opportunity for Woodside and Tuna Australia to work together on a more strategic approach. 	<p>Summary of Feedback, Objection or Claim</p> <p>Tuna Australia has responded providing a position statement that outlines a request for how it would like to be consulted on EP activities. The position statement requests that where there is the potential for the proposed activity to impact Tuna Australia's functions, interests or activities or that of its members, there is a need for a service agreement to be executed.</p> <p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>The fishery management area for the Western Tuna and Billfish Fishery, which Tuna Australia represents, overlaps both the operational area and EMBA. However, there is considered to be no potential for interaction within these areas as:</p> <ul style="list-style-type: none"> No fishing effort has occurred within or nearby to the Operational Area or EMBA in at least the last 10 years, with the nearest fishing effort occurring over 350 km south of the Operational Area (Patterson et al., 2015, 2016, 2017, 2018, 2019, 2020). In the highly unlikely event of a marine diesel spill (represented by the EMBA under a range of different weather conditions), there is considered to be no potential for interaction with the fishery, with its nearest fishing effort ~110 km to the west of the EMBA boundary. <p>Woodside acknowledges previous feedback received from Tuna Australia with respect to separate EPs, and notes that for the proposed activities:</p> <ul style="list-style-type: none"> Woodside has controls in place to identify and manage potential interaction with recreational and commercial fisheries, including establishing and maintaining a publicly available interactive map which provides stakeholders with updated information on activities, including location of seismic vessel, and establishing and maintaining a 3 nm radius Safe Navigation Area around the seismic vessel and towed array. Acoustic emissions from the seismic survey, and general vessel-based noise will be managed in accordance with legislative and regulatory requirements (e.g. EPBC Act Policy Statement 2.1 and EPBC Regulations 2000 – Part 8 Division 8.1) Routine marine vessel discharges will be managed in accordance with legislative and regulatory requirements (e.g. marine orders) There is no planned direct interaction with the seabed as part of the proposed activities. <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside has adopted the following controls to manage potential interactions with commercial fisheries:</p> <ul style="list-style-type: none"> C 10.3 – vessels will comply with the Navigation Act and Marine Order 21 C 1.1 – notifications to AHO to allow generation of navigation warnings and Notice to Mariners C 2.1 – establishment of temporary exclusion zones C 1.3 – AFMA, DAFF – Fisheries, DPIRD, WAFIC, CFA, and relevant Fishery Licence Holders that have the potential to be directly impacted by planned activities in the Operational Area will be notified prior to the commencement and at the end of the activity <p>Woodside has also adopted the following controls to manage the points raised in Tuna Australia's Feedback</p> <ul style="list-style-type: none"> C13.1 and C 9.2 vessels will comply with Marine orders 95 and 96
<p>Other non-government groups or organisations</p>		
<p>350 Australia (350A)</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 14 February 2022, during the course of preparing the EP, 350A self-identified and provided comment on the broader Scarborough development and requested to be consulted on the proposed activity. <ul style="list-style-type: none"> 350A's members are affected by the Scarborough development in a number of ways; it has the potential to impact on marine wildlife. 350A needs to be certain the EP has considered impacts from all pollution sources on all potential receptors and has stringent monitoring and pollution response programs. 350A believes the Scarborough development will produce over one billion tonnes of carbon emissions over the next 25 years, adding to WA's emissions and the planet's burden of climate change impacts, and it will accelerate climate change. On 25 February 2022, Woodside emailed 350A and included responses to address specific claims and objections raised regarding the proposed activity, where appropriate. <ul style="list-style-type: none"> Woodside advised it will assess the self-identification by 350A and the comments received to determine relevancy for the purposes of consultation for future Scarborough EPs when those EPs are being prepared. Woodside provided a link to the publicly available draft EP on the NOPSEMA website which has been available since 13 January 2022. Woodside invited 350A to provide further feedback on the proposed activity. 		

<p>Summary of Feedback, Objection or Claim</p> <p>350A self-identified, provided comment on the broader Scarborough development and requested to be consulted on the proposed activity. 350A provided feedback relating to:</p> <ul style="list-style-type: none"> Impacts to marine wildlife from pollution Carbon emissions and climate change. <p>350A asked for additional time to provide feedback.</p> <p>350A later provided additional feedback:</p> <ul style="list-style-type: none"> Consultation should be undertaken when Revision 3 of the EP is complete and available 350A requested a JASCO report on marine acoustic impacts Impacts of vessel use on turtles Limiting vessel speed in relation to whales Risks controlled to ALARP for vulnerable and endangered species. 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Australian Centre for Corporate Responsibility (ACCR)</p>		
<p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 16 September 2022, Woodside emailed ACCR (Appendix F, reference 1.33) advising of the proposed activity and provided a Consultation Information Sheet. Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the ACCR website. Woodside extended an opportunity to meet to discuss the proposed activity. On 23 September 2022, Woodside followed up with ACCR via email. On 10 October 2022, Woodside followed up with ACCR via email and confirmed no response had been received. 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has assessed claims and objections raised on the ACCR public website that cover topics relevant to the proposed activity, where appropriate and provided responses to ACCR (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>The Climate Council (TCC)</p>		
<p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 16 September 2022 Woodside emailed TCC (Appendix F, reference 1.29) advising of the proposed activity and provided a Consultation Information Sheet. Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the TCC public website. Woodside extended an opportunity to meet to discuss the proposed activity. On 16 September 2022, TCC emailed an automated response to Woodside noting that due to the high volume of emails it receives, TCC may not be able to respond individually to your enquiry. No feedback was received from the organisation. On 23 September 2022, Woodside followed up with TCC via email. On 10 October 2022, Woodside followed up with TCC via email and confirmed no response had been received. 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has assessed claims and objections raised on the TCC public website that cover topics relevant to the proposed activity, where appropriate and provided responses to TCC (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>

Doctors for the Environment Australia (DEA)		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 1 February 2022, during the course of preparing the EP, DEA self-identified and provided comment on the broader Scarborough development and requested to be consulted on the proposed activity. DEA believes it is a relevant organisation due to its membership being comprised of medical professionals who deal with people impacted directly and indirectly by climate change e.g youth, elderly, First Nations people, people from low socioeconomic backgrounds, disabled people, those with disabilities, pre-existing medical conditions and people who live in remote and rural communities. DEA believe that climate change is being called "the greatest global health threat of the 21st century". In Australia, the Australian Medical Association and the Australian College of Nursing have said climate change is health emergency and that health impacts of climate change threaten to undermine the last centuries progress in public and global health. DEA believe that gas is also recognised as a health threat e.g., gas in domestic premises has been shown to contribute to childhood asthma. DEA believe that gas processing on the Burrup Peninsula will also increase existing levels of nitrogen dioxide, sulphur dioxide, ozone, mercury, other heavy metals and many thousands of tonnes of volatile organic compounds. Air pollutants of this type can cause serious health impacts, including heart disease, stroke, lung cancer, asthma and diabetes, even at low levels of exposure. 	<ul style="list-style-type: none"> On 25 February 2022, Woodside emailed DEA and included responses to address specific claims and objections raised regarding the proposed activity, where appropriate. Woodside advised that it will assess the self-identification by DEA and the comments received to determine relevancy for the purposes of consultation for future Scarborough EPs when those EPs are being prepared. Woodside provided a link to the publicly available draft EP on the NOPSEMA website which has been available since 13 January 2022. Woodside invited DEA to provide further feedback on the proposed activity. 	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
Summary of Feedback, Objection or Claim		
<p>DEA self-identified, provided comment on the broader Scarborough development and requested to be consulted on the proposed activity. DEA provide feedback relating to:</p> <ul style="list-style-type: none"> Climate change and global impacts to human health. Pollutants produced by gas processing. 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Based on Woodside's methodology for the Assessment of Additional Persons (see Section 5.3.1) Woodside has determined there is no potential for the functions, interests or activities of DEA to be affected by the activities to be carried out under the Environment Plan, or the revision of the Plan.</p> <p>Woodside confirms the 4D Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP.</p> <p>The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the 4D Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the SITI EP but may be evaluated in Scarborough EPs as appropriate.</p> <p>GHG emissions associated with the Seismic activity (i.e., fuel combustion from project vessels) are considered in Section 6.6.4.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
Extinction Rebellion WA (XRWA)		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 16 September 2022, Woodside emailed XRWA (Appendix F, reference 1.31) advising of the proposed activity and provided a Consultation Information Sheet. Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the XRWA public website. Woodside extended an opportunity to meet to discuss the proposed activity. On 23 September 2022, Woodside followed up with XRWA via email. On 30 September 2022, XRWA emailed Woodside advising it is 'entirely opposed to all of Woodside's new offshore gas extraction projects' and 'When you are ready to respond in a considered and responsible manner to the overwhelming weight of scientific opinion that demands that there must be no new gas projects Extinction Rebellion WA will be only too happy to meet with you.' On 4 October 2022, Woodside emailed XRWA noting XRWA's position that it does not wish to engage further on the proposed activity. 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has assessed claims and objections raised on the XRWA public website that cover topics relevant to the proposed activity, where appropriate and provided responses to XRWA (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
Summary of Feedback, Objection or Claim		
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside has assessed claims and objections raised on the XRWA public website that cover topics relevant to the proposed activity, where appropriate and provided responses to XRWA (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>

Friends of Australian Rock Art, Inc (FARA)

Summary of information provided and record of consultation:

- On 14 January 2022, during the course of preparing the EP, FARA self-identified and provided comment on the broader Scarborough development and requested to be consulted on the proposed activity.
- FARA believes it is a 'relevant organisation' due to being involved for many years in the preservation and conservation of the Murujuga rock art and surrounding landscape.
- FARA raised concerns about the broader impacts of the Scarborough Project including climate change impacts and socio-economic pressures on remote and indigenous communities in the Pilbara.
- FARA raised concerns regarding damage to the cultural landscape and rock art and impacts on Traditional custodians of Murujuga and the Dampier Archipelago who will be directly impacted (emissions, facilities) and indirectly impacted (noise, view, dust).
- FARA believes that increased industrial emissions on the Burrup Peninsula will almost certainly compromise the application to have the site added as a World Heritage place.
- FARA believes its members (focal workers in the gas industry and community members) will be affected by atmospheric emissions from offshore drilling, along associated pipelines, production, transport of the Scarborough gas, and gas used by Perdaman and others on the Burrup Peninsula.
- FARA raised concerns regarding the marine environment and endangered species. FARA's members want to know:
 - That the Scarborough EPs have considered the impacts from all pollution sources on all potential receptors, and include stringent monitoring and pollution-response programs,
 - That there is a robust decommissioning plan with funds set aside.
- On 28 January 2022, Woodside received correspondence from FARA, via NOPSEMA (letter dated 16 January 2022) providing comment on the broader Scarborough development and requested to be consulted on the proposed activity.
- On 25 February 2022, Woodside emailed FARA:
 - Woodside included advice that Woodside has determined there is no potential for the functions, interests or activities of FARA to be affected by the activities to be carried out under the Environment Plan, or the revision of the Plan.
 - Woodside advised that it will assess the self-identification by FARA and the comments received to determine relevancy for the purposes of consultation for future Scarborough EPs when those EPs are being prepared.
 - Woodside provided a link to the publicly available draft EP on the NOPSEMA website which has been available since 13 January 2022.
 - Woodside invited FARA to provide further feedback on the proposed activity
- On 5 April 2022, FARA responded noting it had since consulted with NOPSEMA and understands Woodside's assessment of FARA's relevance.
- FARA also commented that it understands it is appropriate for Woodside to consult with FARA for the Scarborough Operations EP.
- On 22 June 2022, FARA provided further comment on the broader Scarborough development.
- FARA endorses and supports the request made by Murujuga custodians [redacted] and [redacted] that they are 'relevant persons' to be consulted by Woodside on the Scarborough gas project.
- FARA stated it also has relevant person status as Murujuga's rock art will be indirectly impacted by the proposed development.
- FARA claimed acidic emissions from Woodside's JV site at Karratha Gas Plant have been impacting on the fragile patina of the adjoining petroglyphs and emissions from Scarborough activities will further increase this impact. Using scrubber technology advocated by FARA has never been adopted by Woodside due to costs.
- With the proposal to process additional gas for another 25 years using the aging infrastructure of the Karratha Gas Plant, FARA sees it as extremely urgent that Woodside's emissions-control technology, and that of the two Pluto plants, is updated to world standards in order to substantially reduce its toxic NOx and SOx emissions.
- FARA wishes to be consulted by Woodside on all EPs pertaining to developments which would cause or lead to damage (both direct and indirect impacts) to Murujuga's rock art.
- On 22 July 2022, Woodside advised FARA that the previous advice provided on 25 February 2022 still applies.
- Woodside confirmed it makes information on each of its EPs publicly available via its website. Woodside also confirmed it continues to accept feedback on the EPs which are made publicly available by the regulator upon initial submission and final acceptance and remain available online following final acceptance.

Summary of Feedback, Objection or Claim

- FARA self-identified, provided comment on the broader Scarborough development.
- FARA's feedback relating to:
 - Murujuga rock art and surrounding landscape
 - Climate change
 - Socio-economic pressures on remote and indigenous communities
 - Direct and indirect impacts on Traditional custodians of Murujuga and the Dampier Archipelago
 - Burrup Peninsula's World Heritage listing application compromised
 - Their members being affected by impacts of emissions from Scarborough activities
 - The Impacts to marine environment and endangered species
 - Impacts from all pollution sources on all potential receptors.

Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response

Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Based on Woodside's methodology for the Assessment of Additional Persons (see Section 5.3.1) Woodside has determined there is no potential for the functions, interests or activities of FARA to be affected by the activities to be carried out under the Environment Plan, or the revision of the Plan. Woodside confirms the 4D Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the 4D Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the seismic EP but may be evaluated in Scarborough EPs as appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).

Environment Plan Controls

No additional measures or controls are required.

Internal Fund for Animal Welfare (IFAW)	
Summary of information provided and record of consultation:	
<ul style="list-style-type: none"> On 16 September 2022, Woodside emailed IFAW (Appendix F, reference 1.34) advising of the proposed activity and provided a Consultation Information Sheet. Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the IFAW public website. Woodside extended an opportunity to meet to discuss the proposed activity. On 23 September 2022, Woodside followed up with IFAW via email. On 10 October 2022, Woodside followed up with IFAW via email and confirmed no response had been received. 	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
Summary of Feedback, Objection or Claim	
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has assessed claims and objections raised on the IFAW public website that cover topics relevant to the proposed activity, where appropriate and provided responses to IFAW (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>
Lock The Gate Alliance (L.TGA)	
Summary of information provided and record of consultation:	
<ul style="list-style-type: none"> On 4 February 2022, during the course of preparing the EP, LTGA self-identified and provided comment on the broader Scarborough development and requested to be consulted on the proposed activity: <ul style="list-style-type: none"> LTGA believes it is a relevant organisation which will be affected by the Scarborough development. Its members, especially those who live in the Pilbara and Kimberley, those who depend on groundwater, and those who live in areas subject to flooding (especially the Kimberley), will be affected by climate change which will be increased by the project. LTGA commented that the development will produce carbon emissions over the next 25 years, impacting climate change and socioeconomic pressures which will directly affect LTGA and its supporters. LTGA believe that the Scarborough development will lead to damage to the National Heritage values of the Burrup Peninsula. On 25 February 2022, Woodside emailed LTGA and included responses to address specific claims and objections raised regarding the proposed activity, where appropriate. <ul style="list-style-type: none"> Woodside advised it will assess the self-identification by LTGA and the comments received to determine relevancy for the purposes of consultation for future Scarborough EPs when those EPs are being prepared. Woodside provided a link to the publicly available draft EP on the NOPSEMA website which has been available since 31 August 2021. Woodside invited LTGA to provide further feedback on the proposed activity. 	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
Summary of Feedback, Objection or Claim	
<p>LTGA self-identified, provided comment on the broader Scarborough development and requested to be consulted on the proposed activity. LGTA provided feedback relating to:</p> <ul style="list-style-type: none"> Socio-economic impacts of climate change and carbon emissions on its members Damage to National Heritage values of the Burrup Peninsula. 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Based on Woodside's methodology for the Assessment of Additional Persons (see Section 5.3.1) Woodside has determined there is no potential for the functions, interests or activities of LTGA to be affected by the activities to be carried out under the Environment Plan, or the revision of the Plan. Woodside confirms the 4D Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the 4D Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the Seismic EP but may be evaluated in Scarborough EPs as appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>
Market Forces	
Summary of information provided and record of consultation:	
<ul style="list-style-type: none"> On 16 September 2022, Woodside emailed Market Forces (Appendix F, reference 1.32) advising of the proposed activity and provided a Consultation Information Sheet. Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the Market Forces public website. Woodside extended an opportunity to meet to discuss the proposed activity. On 23 September 2022, Woodside followed up with Market Forces via email (Appendix F, reference 1.27). On 10 October 2022, Woodside followed up with Market Forces via email and confirmed no response had been received. On 10 October 2022, Market Forces emailed Woodside noting it would like to continue to receive correspondence regarding EPs for Woodside projects and the opportunity to consult and provide feedback on those plans. 	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>

<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has assessed claims and objections raised on the Market Forces public website that cover topics relevant to the proposed activity, where appropriate and provided responses to Market Forces (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>World Wildlife Fund (WWF) Australia</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> • On 19 September 2022, Woodside emailed WWF (Appendix F, reference 1.35) advising of the proposed activity and provided a Consultation Information Sheet. - Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the WWF public website. - Woodside extended an opportunity to meet to discuss the proposed activity. • On 19 September 2022, WWF provided an automated email response to Woodside noting a member of its Supporter Relation team will be in touch shortly. • On 23 September 2022, Woodside followed up with WWF via email. No feedback received from WWF. • On 10 October 2022, Woodside followed up with WWF via email and confirmed no response had been received. 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has assessed claims and objections raised on the WWF public website that cover topics relevant to the proposed activity, where appropriate and provided responses to WWF (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>University of Western Australia (UWA)</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> • On 14 December 2022, Woodside emailed UWA in response to an email regarding Woodside's Scarborough State EP and arranged a time to meet. • On 15 December 2022, Woodside met with representatives from UWA via video conference to provide a briefing on the broader Scarborough Project activities and related EPs. During its meeting UWA confirmed: <ul style="list-style-type: none"> - In general, Woodside's offshore activities are out of the scope of interest for UWA, however, it has a particular interest in the Madeleine Shoals and the adjacent borrow ground in Commonwealth waters; - There is a lack of data on terrain outside of the current mapping on Madeleine Shoals that, while unlikely, may extend north (towards the borrow ground area); - The full extent of the terrain was not captured given time and cost constraints; and, - The current mapping has the Shoals mapped ~1.3 km from the borrow ground boundary and ~1.3 km from the marine park boundary and ~100 m from the borrow ground that indicates no exposed rock or hard material. • UWA also acknowledged Woodside may already have mapping of the borrow ground and adjacent marine park found no hard material and a substantial depth of sand. • Woodside confirmed extensive studies of the borrow ground and adjacent marine park found no hard material and a substantial depth of sand. • UWA concluded it has submitted for additional funding for further exploration of Madeleine Shoals. • On 6 February 2023, Woodside emailed UWA advising of the proposed activity (Appendix F, reference 1.74) and provided an updated Consultation Information Sheet. 		
<p>Summary of Feedback, Objection or Claim</p> <p>UWA has advised that the proposed Scarborough activities are predominantly outside the scope of interest for UWA. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Western Australian Marine Science Institution (WAMSI)</p>		
<p>Summary of consultation provided and responses:</p>		
<ul style="list-style-type: none"> • On 3 February 2023, Woodside emailed WAMSI advising of the proposed activity (Appendix F, reference 1.70) and provided an updated Consultation Information Sheet. - Woodside also asked for details of any research activities WAMSI is undertaking that may overlap with the proposed activity. • On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.84). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>

Commonwealth Scientific and Industrial Research Organisation (CSIRO)		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 6 February 2023, Woodside emailed CSIRO advising of the proposed activity and provided an updated Consultation Information Sheet. Woodside also asked for details of any research activities CSIRO is undertaking that may overlap with the proposed activity. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.96). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Australian Institute of Marine Science (AIMS)		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 6 February 2023, Woodside emailed AIMS advising of the proposed activity (Appendix F, reference 1.75) and provided an updated Consultation Information Sheet. Woodside also asked for details of any research activities AIMS is undertaking that may overlap with the proposed activity. On 9 February 2023, AIMS emailed Woodside thanking it for the opportunity to consider the proposed activity. AIMS confirmed there are no overlaps with planned AIMS science activities in the area. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
AIMS has confirmed there are no overlaps with planned AIMS science activities in the area. Whilst feedback has been received, there were no objections or claims.	Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.

6 ENVIRONMENTAL IMPACT AND RISK ASSESSMENT, PERFORMANCE OUTCOMES, STANDARDS AND MEASUREMENT CRITERIA

6.1 Overview

This section presents the impact and risk analysis and evaluation, EPOs, EPSs and MC for the Petroleum Activities Program, using the methodology described in **Section 2**.

6.2 Analysis and Evaluation

The analysis and evaluation demonstrate that the identified risks and impacts associated with the Petroleum Activities Program are reduced to ALARP, are of an acceptable level and consider all operations of the activity, including potential emergency conditions.

The risks identified during the ENVID (including decision type, current risk level, acceptability of risk and tools used to demonstrate acceptability and ALARP) have been divided into two broad categories:

- planned (routine and non-routine) activities
- unplanned events (accidents, incidents or emergency situations).

Within these categories, impact assessment groupings are based on stressor type, e.g. emissions, physical presence, etc. In all cases, the worst credible consequence was assumed.

The ENVID conducted on 12 April 2021 identified seven impacts and seven risks associated with the Petroleum Activities Program. Planned activities and unplanned events are summarised in **Table 6-1**.

The analysis and evaluation for the Petroleum Activities Program indicate that all the current environmental risks and impacts associated with the activity are reduced to ALARP and are of an acceptable level, as discussed further in **Sections 6.6** and **6.7**. As described in **Section 4** marine ecosystems and species hold both cultural and environmental value to traditional custodians.

Woodside recognises the potential for marine ecosystems to include cultural features as well as environmental values, as described in **Section 4.10.1**. As a result, potential impacts and risks to environmental receptors must be managed to ALARP and an acceptable level in offshore areas. Therefore potential impacts and risks to cultural features associated with coastal Indigenous connection with, or traditional uses of marine species and associated ecosystems in nearshore coastal waters are also reduced to ALARP and an acceptable level.

Consultation with Indigenous Groups has not resulted in any advice which contradicts this approach in regards to cultural, spiritual or environmental values. Where ongoing consultation identifies a need for additional mitigations beyond those established to manage environmental values, this will be managed through the processes described in **Section 7.6**.

6.3 Cumulative Impacts

Woodside has assessed the cumulative impacts of the Petroleum Activities Program in relation to other petroleum activities which could realistically result in overlapping temporal and spatial extents. Scarborough drilling and completion activities may be undertaken within WA-61-L however there will be no temporal overlap (activities will not occur concurrently) and therefore no cumulative impacts are predicted with this activity. The potential cumulative impact of concurrent activities is assessed in **Section 6.6.1** (Physical Presence) and **Section 6.6.2** (Routine Acoustic Emissions: Seismic Survey Equipment).

6.4 Environment Risks/Impacts not Deemed Credible or Outside the Scope of this EP

The ENVID identified one source of environmental risk/impact, the generation of noise from helicopters, that was assessed as not being applicable (not credible) within or outside the Operational Area and therefore was determined to not form part of this EP (refer **Section 2.6**).

Impacts of noise from helicopter transfers to marine fauna is not considered credible as the Operational Area is more than 185 km from mainland Australia and there are no identified BIAs or other biologically sensitive areas within the Operational Area.

6.5 Indirect Impacts from Activities Outside of the Operational Area

For the proposed Scarborough 4D Baseline (B1) MSS, the potential 'indirect' environmental impacts and risks evaluated are those associated with mobilisation/demobilisation of the seismic vessel and project vessels to the Operational Area, which have been considered in the environmental impact assessment in **Sections 6.6 and 6.7**. Due to the nature and scale of the PAP and these potential indirect environmental impacts and risks, and the regulatory frameworks and applicable maritime regulations in place to manage them, Woodside considers the potential impacts and risks from mobilisation and demobilisation of the seismic and project vessels to be inherently ALARP in its current state. Therefore, Woodside considers that standard vessel operations are appropriate to manage the potential impacts and risks from mobilisation and demobilisation of the seismic and project vessels to a level that is acceptable.

As described in **Section 3.2**, the purpose of the Petroleum Activities program is for the appraisal of gas fields for the management of hydrocarbon reserves. The extraction of Scarborough gas for onshore processing is not included in this Petroleum Activities Program. Future petroleum activities must first be authorised under the OPGGS(E)R and implemented before Scarborough gas is able to be extracted for onshore processing. Therefore, any indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of this Petroleum Activities Program, and will be evaluated in Scarborough EPs as appropriate.

Table 6-1: Environmental risk and impact analysis summary of planned and unplanned activities

Aspect	EP section	Consequence	Risk rating		Acceptability of impact/risk
			Potential impact/consequence level	Likelihood	
Planned activities (routine and non-routine)					
Physical presence: Interference with marine users	6.6.1	E	Social and Cultural – Slight, short-term impact (less than one year) to a community or areas/items of cultural significance	-	Broadly acceptable
Routine acoustic emissions: Seismic survey equipment	6.6.2	D	Environment – Minor, short-term impact (one to two years) on species, habitat (but not affecting ecosystems function), physical or biological attributes	-	Acceptable
Routine acoustic emissions: Vessels and mechanical equipment operation	6.6.3	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors.	-	Broadly acceptable
Routine atmospheric emissions: Fuel combustion	6.6.4	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors (e.g. air quality).	-	Broadly acceptable
Routine discharges: Bilge water, grey water, sewage, putrescible wastes and deck drainage water	6.6.5	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors.	-	Broadly acceptable
Routine light emissions: External lighting on project vessels	6.6.6	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors.	-	Broadly acceptable
Unplanned activities (accidents, incidents, emergency situations)					
Accidental hydrocarbon release: Vessel collision	6.7.2	D	Environment – Minor, short-term impact (one to two years) on species, habitat (but not affecting ecosystems function), physical or biological attributes	1	M Acceptable
Accidental hydrocarbon release: Bunkering	6.7.3	E	Environment – Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes.	1	L Broadly acceptable
Unplanned discharge: Deck spills	6.7.4	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors (e.g. water quality).	2	L Broadly acceptable
Unplanned discharge: Loss of solid hazardous and non-hazardous wastes (including dropped objects)	6.7.5	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors (e.g. water quality).	1	L Broadly acceptable
Physical presence: Vessel collision/entanglement with marine fauna	6.7.6	E	Environment – Slight, short term local impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes.	1	L Broadly acceptable
Physical presence: Loss of equipment	6.7.7	F	Environment – No lasting effect (less than one month); localised impact not significant to environmental receptors.	2	L Broadly acceptable
Physical presence: Introduction and establishment of invasive marine species	6.7.8	D	Environment – Minor, short-term impact (one to two years) on species, habitat (but not affecting ecosystems function), physical or biological attributes.	0	L Broadly acceptable

6.6 Planned Activities (Routine and Non-routine)

6.6.1 Physical Presence: Interactions with Other Marine Users

Context														
Activity Components – Section 3.5				Socio-Economic Environment – Section 4.10				Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted						Evaluation							
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socio-Economic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Displacement of other marine users – proximity of project vessels (and submersible equipment) interfering with or displacing third party vessels (commercial fishing, recreational fishing/tourism, research/monitoring programs and commercial shipping)							X	A	F	-	-	GP	Broadly Acceptable	EPO 1, 2
Potential interactions with proposed oil and gas activities							X							
Description of Source of Impact														
<p>Project Vessels (including the towed seismic equipment)</p> <p>The Petroleum Activities Program will be conducted using a single seismic vessel. A temporary 3 nm SNA will be maintained around the seismic vessel and towed array (comprising the airgun array and streamer array, which includes header buoys, starboard and port deflectors or baravanes, streamers and tail buoys) during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.</p> <p>The support vessel will accompany the seismic vessel to re-supply it with fuel and other logistical and operational supplies (including taking the seismic vessel under tow, if required). An additional chase vessel may be used to manage interactions with shipping and fishing activities, if required. It is intended that a dedicated spotter vessel with two MFOs aboard will be deployed ahead of the seismic vessel during all activities with seismic source discharge.</p>														

Impact Assessment
Potential Impacts to Environmental Values
<p>Commercial Fishing</p> <p>Potential for interaction with commercial fisheries is a common consideration for marine seismic surveys. Should any commercial fishing activities occur within the Operational Area, commercial fishers may be asked to deviate from fishing grounds periodically to accommodate seismic survey operations, any potential interactions with commercial</p>

Impact Assessment

fisheries would be short term due to the transient nature of the seismic vessel and the small area occupied by the seismic vessel (and SNA) at any one time, and limited to operational inconvenience (navigational hazard) and temporary displacement from fishing grounds within the Operational Area.

There are a number of Commonwealth and State managed fisheries with management areas that overlap with the Operational Area, however, none of these fisheries have conducted any fishing activities within the Operational Area in at least the last 10 years. There is only one Commonwealth managed fishery (Western Deepwater Trawl Fishery) and one State managed fishery (West Coast Deep Sea Crustacean Managed Fishery) that have historically had catch/effort within the Operational Area prior to 2010. There has been no recent fishing catch/effort within the Operational Area from 2008-2019 (Woodhams and Bath 2017; Patterson et al., 2020) and 2018- 2022 (DPIRD, 2022), respectively (refer to **Section 4.10.2**). The Operational Area is located in water depths ranging from about 800-1150 m, located outside of the depth range where significant fisheries effort normally occurs.

Given the lack of fishing catch/effort in the Operational Area in recent years, it is expected that there will be no impact to commercial fisheries as a result of the presence of the proposed Scarborough 4D B1 MSS.

Recreational Fishing and Tourism Operations

The presence of project vessels and submersible equipment has the potential to impact third party vessels within or adjacent to the Operational Area. Interactions could result in short-term displacement of vessels as they make course alterations to avoid the project vessels (and associated towed seismic equipment in the SNA)

However, the Operational Area is considered too far offshore for recreational fishing or tourism activities to occur. Therefore, it is expected that there will be no impact to recreational fishing or tourism activities as a result of the presence of the proposed Scarborough 4D B1 MSS.

Commercial Shipping

The presence of project vessels and submersible equipment may cause temporary disruptions to commercial shipping. Moderate density shipping traffic may be encountered in the northeast corner of the Operational Area.

The potential impacts to commercial shipping vessels are expected to include short-term displacement of vessels as they make slight course alterations to avoid the project vessels (and associated towed seismic equipment in the SNA).

Oil and Gas Activities

No oil and gas production wells or facilities are located within the Operational Area (refer to **Figure 4-15**). Therefore, no impacts to oil and gas activities are expected.

Defence

The DoD did not identify any activities within the NWSA however the potential for UXOs was raised. Based on the locations of the proposed activity and potential UXOs it was determined that there is no credible risk from UXOs for the proposed activity.

Cumulative Assessment

Commercial Fishing

As above, there has been no recent fishing catch/effort within the Operational Area for the Commonwealth Western Deepwater Trawl Fishery (2008-2019) and WA West Coast Deep Sea Crustacean Managed Fishery (2010-2019), and therefore no impacts to commercial fisheries are expected. There are no other known seismic surveys planned to occur in these fisheries and, therefore, no cumulative impacts are expected.

Commercial Shipping

The Operational Area overlaps with a shipping fairway and north-south international shipping traffic. There are no other known seismic surveys planned to occur on the west coast of WA that may interact with the same international vessels within the fairway and, therefore, no cumulative impacts to shipping are expected.

Summary of Potential Impacts to Environmental Values(s)

Given the adopted controls, it is considered that physical presence of project vessels (including towed seismic equipment) will not result in a potential impact greater than slight, short-term temporary displacement of commercial shipping. Commercial vessels may be required to make small alterations to their course to avoid the project vessels (and associated towed seismic equipment in the SNA) but these interactions can be managed in accordance with standard maritime practices.

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
None identified.				
Good Practice				
Notify AHO of activities and movements no less than four weeks before the scheduled activity commencement date.	F: Yes CS: Minimal cost. Standard practice.	Notification to AHO will enable them to generate navigation warnings (Maritime Safety Information Notifications (MSIN)) and NTM and NTA [including AUSCOAST warnings where relevant]).	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.1
Notify AMSA Joint Rescue Coordination Centre (JRCC) of activities and movements 24–48 hours before the scheduled activity commencement date.	F: Yes CS: Minimal cost. Standard practice.	Communication of the Petroleum Activities Program to other marine users ensures they are informed and aware, thereby reducing the likelihood of interference with other marine users.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.2
Notify relevant government departments, fishing industry representative bodies, fishery licence holders, and other oil and gas operators (if agreed during consultation) of activities prior to commencement and upon completion of activities	F: Yes CS: Minimal cost. Standard practice.	Communication of the Petroleum Activities Program to other marine users ensures they are informed and aware, thereby reducing the likelihood of interference with other marine users.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.3
Engage with proponents identified as having potential concurrent activities within the Operational Area prior to commencing the Petroleum Activities Program and develop an operations plan including the following aspects: <ul style="list-style-type: none"> communications work programming hazard management emergency response. 	F: Yes CS: Minimal cost. Standard practice.	Communication of the Petroleum Activities Program to other marine users ensures they are informed and aware, thereby reducing the likelihood of interference with other marine users.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.4
Notify Defence of activities and movements no less than five weeks before the scheduled activity commencement date	F: Yes CS: Minimal cost. Standard practice.	Communication of the Petroleum Activities Program to other marine users ensures they are informed and aware, thereby reducing the	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.5

⁴Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
		likelihood of interference with other marine users.		
Establish and maintain a publicly available interactive map which provides persons with updated information on activities being conducted as part of the Petroleum Activities Program, including location of seismic vessel.	F: Yes. CS: Minimal cost	Interactive map provides additional/alternate method for marine users to obtain information on the timing of activities, thereby reducing the likelihood of interference with other marine users.	Benefits outweigh cost/sacrifice.	Yes C 1.6
Establish and maintain a 3 nm radius SNA around the seismic vessel and towed array.	F: Yes CS: Minimal cost. Standard practice.	Presence of the SNA will reduce the likelihood of interfering with other marine users.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 2.1
At least one dedicated support/chase vessel will be employed to assist the seismic vessel.	F: Yes CS: Minimal cost. Standard practice.	Use of a support/chase vessels to assist the seismic vessel will reduce the likelihood of an interaction with a third party vessel.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 2.2
Project vessels to operate AIS, and tail buoys will be fitted with lights, Global Navigation Satellite System (GNSS) and virtual AIS.	F: Yes CS: Minimal cost. Standard practice.	Use of AIS on project vessels, and lights, virtual AIS and GNSS on tail buoys will reduce the likelihood of an interaction with a third party vessel.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 2.3
Woodside will consider evidence based claims from commercial fishing licence holders where: <ul style="list-style-type: none"> There is genuine displacement from undertaking normal fishing activities that results in demonstrable economic loss. Deployed fishing equipment has been accidentally lost or damaged by any activities under Woodside's control. There is a loss of catch due to the seismic activity that can be demonstrated 	F: Yes However, due to the absence of commercial fishing in the Operational Area, displacement of fishers are not expected. CS: Time, stakeholder fatigue and potential confusion associated with communicating [Document Title] and engaging with fishers unnecessarily.	Given limited fishing activity has ever taken place in or near the Operational Area and no fishing effort has been reported in over 10 years, the Operational Area does not represent an area that is significant to fisheries and displacement is not expected. Therefore, providing a process for compensation claims provides no benefit.	Cost is grossly disproportionate to the limited benefit gained.	No

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
Professional Judgement – Eliminate				
Limit activities to avoid peak shipping and commercial fishing activities.	F: No. Shipping occurs year-round and cannot be avoided. Concurrent operations (CONOPS) with fishing seasons cannot be eliminated as fishing activities occur consistency throughout the year, and exact timings and locations of fishing activities are not known. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Eliminate use of vessels.	F: No. The use of vessels is required to conduct the Petroleum Activities Program. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				
ALARP Statement				
On the basis of the environmental impact assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts and risks of the physical presence of the project vessels on other marine users, which is expected to be limited to commercial shipping movements. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
<p>The impact assessment has determined that, given the adopted controls, physical presence of the project vessels (and associated towed seismic equipment in the SNA) is unlikely to result in potential impact greater than slight, short-term impact to other marine users, such as commercial shipping. In addition, these activities will not interfere with other marine users rights to a greater extent than is necessary. Further opportunities to reduce the impacts and risks have been investigated above.</p> <p>The adopted controls are considered good oil-field practice/industry best practice and meet expectations of AMSA and AHO provided during consultation with stakeholders. The potential impacts and risks are considered broadly acceptable if the adopted controls are implemented.</p> <p>Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks of the physical presence of the project vessels (and associated towed seismic equipment in the SNA) to a level that is broadly acceptable.</p>

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 1 Marine users are aware of the Petroleum Activities Program.	C 1.1 Notify AHO of activities and movements no less than four weeks before the scheduled activity commencement date.	PS 1.1 Notification to AHO four weeks prior to scheduled commencement to allow for the generation of navigation warnings (MSIN, NTA and NTM [including AUSCOAST warnings where relevant]).	MC 1.1 Consultation records demonstrate that AHO has been notified prior to commencement of the Petroleum Activities Program within the required timeframes.
	C 1.2 Notify AMSA Joint Rescue Coordination Centre (JRCC) of activities and movements 24–48 hours before the scheduled activity commencement date.	PS 1.2 Notification to AMSA JRCC 24–48 hours prior to the scheduled commencement date.	MC 1.2.1 Consultation records demonstrate that AMSA JRCC has been notified prior to commencement of the Petroleum Activities Program within the required timeframes.
	C 1.3 Notify relevant government departments, fishing industry representative bodies, fishery licence holders, and other oil and gas operators (if agreed during consultation) of activities prior to commencement and upon completion of activities	PS 1.3 Notification to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2	MC 1.3.1 Consultation records demonstrate that relevant stakeholders have been notified prior to commencement of the Petroleum Activities Program within the required timeframes and on completion of activities.
	C 1.4 Engage with proponents identified as having potential concurrent activities within the Operational Area prior to commencing the Petroleum Activities Program and develop an operations plan including the following aspects: <ul style="list-style-type: none"> • communications • work programming • hazard management • emergency response 	PS 1.4 A concurrent operations plan developed for any concurrent MSS activities identified within the Operational Area.	MC 1.4.1 Records demonstrate Woodside re-engage with identified proponent before commencing the Petroleum Activities program and developed a concurrent operations plan (if required).
	C 1.5 Notify Defence of activities and movements no less than five weeks before the scheduled activity commencement date.	PS 1.5 Notification to Defence five weeks prior to the scheduled commencement date.	MC 1.5.1 Records demonstrate that Defence has been notified prior to commencement of the Petroleum Activities Program within the required timeframes.

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	C 1.6 Establish and maintain a publicly available interactive map which provides stakeholders with updated information on activities being conducted as part of the Petroleum Activities Program, including location of seismic vessel.	PS 1.6 Activity interactive map established and maintained throughout activities.	MC 1.6.1 Records demonstrate interactive map was provided and available to stakeholders throughout activities.
EPO 2 Prevent adverse interactions between vessels and other marine users during the Petroleum Activities Program	C 2.1 Establish and maintain a 3 nm radius SNA around the seismic vessel and towed array.	PS 2.1 SNA established, communicated and maintained around the seismic vessel and towed array during the Petroleum Activities Program.	MC 2.1.1 Records demonstrate that the SNA has been established and details have been communicated to approaching third-party vessels.
	C 2.2 Employ at least one support/chase vessel will be employed to assist the seismic vessel.	PS 2.2 At least, one vessel employed to assist the seismic vessel mitigate interactions with third-party vessels.	MC 2.2.1 Records demonstrate that a second vessel is employed for the Petroleum Activities Program.
	C 2.3 Project vessels to operate AIS, and tail buoys will be fitted with lights, GNSS and virtual AIS.	PS 2.3 Project vessels operating AIS and tail boys fitted with lights, GNSS and virtual AIS.	MC 2.3.1 Records demonstrate that project vessels operating AIS, and tail boys are fitted with lights, GNSS and virtual AIS.

6.6.2 Routine Acoustic Emissions: Seismic Survey Equipment

Context														
Activity Components – Section 3.5			Physical Environment – Section 4.4 Biological Environment – Section 4.5 Socio-Economic Environment – Section 4.10					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Generation of underwater noise from seismic survey equipment					X	X	X	B	D	-	-	LG S GP	Acceptable	EPO 3, 4, 5, 6
Description of Source of Impact														
<p>The Petroleum Activities Program will use a seismic source, consisting of an airgun array with a maximum capacity of up to 3150 in³, towed at a water depth of 6–8 m (±1 m). The source will be used to generate acoustic pulses by periodically discharging compressed air into the water column, at intervals of about five to six seconds as the vessel transits along planned survey lines within the Active Source Area.</p> <p>The 3150 in³ seismic source is expected to produce far-field source levels up to a maximum of 254.4 dB re 1 µPa m (PK) and per-pulse SEL of 227.4–230.2 dB re 1 µPa²m²s (at 10-2000 Hz) in the vertical plane directly beneath the array. In the horizontal (broadside) plane, the seismic source is expected to produce far-field source levels up to a maximum of 248.1 dB re 1 µPa m (PK) and per-pulse SEL of 224.1 dB re 1 µPa²m²s (at 10-2000 Hz).</p>														

Impact Assessment
<p>Elevated underwater noise can affect marine fauna, including marine mammals (cetaceans), turtles and fishes in three main ways (Richardson et al., 1995; Simmonds et al., 2004):</p> <ul style="list-style-type: none"> • By causing direct physical effects, including injury or hearing impairment. Hearing impairment may be temporary (temporary threshold shift – TTS), or permanent (PTS), with PTS generally considered to represent a form of injury. • Through disturbance leading to behavioural changes or displacement from important areas. The occurrence and intensity of disturbance is highly variable and depends on a range of factors relating to the animal and situation. • By masking or interfering with other biologically important sounds (including vocal communication, echolocation, signals and sounds produced by predators or prey). <p>The area over which seismic sound may adversely impact marine species depends upon multiple factors including the extent of sound propagation relative to the location of receptors, and the sensitivity and range of spectral hearing of different species (Slabbekoorn et al., 2010; Popper and Hawkins, 2012).</p> <p>Without adequate control measures in place, noise emitted from the seismic source used during the Petroleum Activities Program has the potential to impact a range of receptor groups, being:</p> <ul style="list-style-type: none"> • plankton • benthic invertebrates • fish, sharks and rays

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- cetaceans
- marine turtles
- seabirds and migratory shorebirds
- commercial fisheries
- marine protected areas.

Sound metric terminology

Sound levels and the decibel scale

The decibel (dB) scale is used to measure the amplitude or 'loudness' of a sound wave. For underwater sounds, the dB scale is denoted relative to the reference pressure of 1 micropascal (μPa) e.g. dB re 1 μPa , whereas the reference pressure level used in air is 20 μPa , which was selected to match human hearing sensitivity. Because of these differences in reference standards, dB sound levels in air are not comparable to underwater sound levels i.e. dB sound levels underwater are much quieter than the same dB sound levels in air (Carroll et al., 2017).

Sound metrics

Marine seismic surveys emit pulses of underwater sound. These sounds are termed 'impulsive' sounds as they are brief and intermittent with rapid rise times and decay back to ambient levels (within a few seconds).

There are four main metrics used to measure and describe underwater sound pressure and energy that are applied to the assessment of these types of sound, all of which use the decibel scale (adapted from ISO/DIS 18405.2:2017):

- **Zero-to-peak sound pressure (PK)**, the greatest magnitude of the sound pressure during a specified time interval (**Figure 6-1**); unit: dB re 1 μPa ; PK levels are relevant to the assessment of potential physical injury and impairment impacts to marine fauna and biota resulting from a single seismic pulse.
- **Peak-to-peak sound pressure (PK-PK)**, sum of the peak compressional pressure and the peak rarefactional pressure during a specified time interval (approximately double the zero-to-peak pressure) (**Figure 6-1**); unit: dB re 1 μPa ; PK-PK levels, like PK levels, are relevant to the assessment of potential physical injury and impairment impacts to marine fauna and biota resulting from a single seismic pulse.
- **Root-mean-square sound pressure level (SPL)**, the time-mean-square sound pressure, in a stated frequency band, to the square of the reference sound pressure over the duration of an acoustic event (i.e. the duration of a single seismic pulse) (**Figure 6-1**); unit: dB re 1 μPa ; because the SPL represents the effective sound pressure over the full duration of the acoustic event rather than the maximum instantaneous peak pressure, it is regularly used to represent the effective loudness of a sound and to assess the potential for a behavioural response from marine fauna.
- **Sound exposure level (SEL)**, a measure related to the sound energy (instead of the sound pressure) in one or more pulses, or the ratio of the time-integrated squared sound pressure to the specified reference value; unit: dB re 1 $\mu\text{Pa}^2\cdot\text{s}$; SEL is specified in terms of either a per-pulse SEL or an accumulated SEL (SEL_{cum}) from multiple pulses over a given period. SEL recognises that the effects of sound can be a function of exposure duration as well as maximum instantaneous peak pressure. SEL can therefore be considered a dose-type measurement with SEL_{cum} being used to assess dose-type impacts such as the potential for the gradual onset of temporary threshold shift (TTS) in marine fauna hearing because of prolonged exposure to high sound levels. It is standard practice for SEL_{cum} to be assessed over a summation period of 24-hours ($\text{SEL}_{24\text{h}}$).

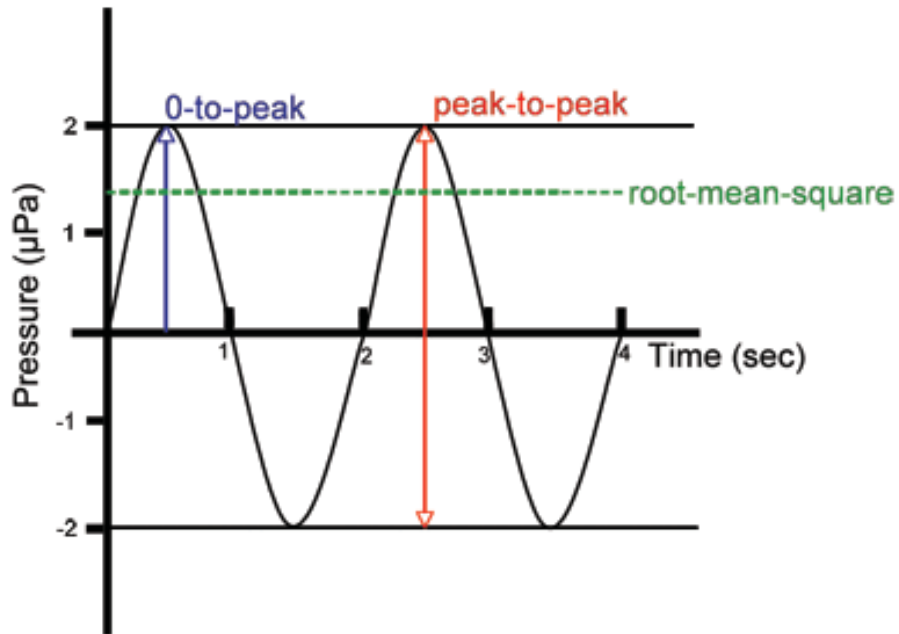


Figure 6-1: Simplified sound wave and sound pressure metrics (University of Rhode Island and Inner Space Center, 2017)

Particle motion

The particle motion component of sound is also relevant to the assessment of potential impacts to marine fauna. Acoustic particle motion refers to the physical motion caused by a sound wave within the water, seabed or other medium. Unlike pressure, particle motion is directional in nature, although the actual to-and-fro particle displacements that constitute sound are extremely small, in the order of nanometres (Popper and Hawkins, 2018). Particle motion can be described in terms of particle displacement (m), velocity (m/s), or acceleration (m/s^2) (Popper et al., 2014; Carroll et al., 2017). Alternatively, it is sometimes expressed in dB with respect to a reference value of displacement (dB re 1 μm), velocity (dB re 1 nm/s) or acceleration (dB re 1 $\mu m/s^2$) (Nedelec et al., 2016).

Particle motion is important because marine invertebrates and most fishes are primarily sensitive to particle motion rather than sound pressure and, therefore, particle motion is the most relevant metric for perceiving underwater sound by invertebrates and most fish species (Popper and Hawkins, 2019). However, there is currently limited information available to quantify the particle motion sensitivity of fishes and invertebrates. It is complex and challenging to directly measure particle motion compared to sound pressure, hence most research is presented in the context of sound pressure or exposure levels instead of particle motion (Carroll et al., 2017; Popper and Hawkins, 2018). Therefore, while the assessment of underwater noise impacts in this EP considers the role of particle motion and its effect on fishes and invertebrates, the acoustic modelling and impact threshold criteria are based upon sound pressure and sound exposure metrics.

It should be noted that particle motion is most relevant close to the source where it is the dominant component of a sound wave, while pressure will dominate a sound wave propagating over distance (Radford et al., 2012; Morley et al., 2014; Nedelec et al., 2016; Popper and Hawkins, 2018). Sound pressure levels received at increasing distance from a source do not, therefore, provide a reliable representation of particle motion. Organisms that are sensitive only to particle motion have typically been found to be sensitive only at close range where these particle motions are greatest (Popper et al., 2014; Edmonds et al., 2016; Popper and Hawkins, 2018).

Sound frequency and hearing sensitivity

Different animals are sensitive to different sound frequencies, which are measured in Hertz (Hz) and kilohertz (kHz). Therefore, if an animal is sensitive to a particular frequency range, a sound in that frequency range will seem louder to that animal than to a different animal which is less sensitive to those frequencies. For example, some large baleen whales are sensitive to very low frequency sounds (7 Hz to 35 kHz), while other toothed whales and dolphin species are considered more sensitive to mid-high frequency sounds (150 Hz to 160 kHz) with their peak hearing frequency somewhere between these frequency ranges (National Marine Fisheries Service, 2018). Therefore, how loud a sound will be perceived will differ between species.

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In some cases, a sound level is specified relative to a given frequency range or is weighted according to the auditory sensitivity of an animal (e.g. low-frequency, medium-frequency and high-frequency groups of cetaceans). This has the advantage of placing the sound into a more biologically relevant context for that animal. If a frequency range or weighting is not specified, the frequency of the sound is generally referred to as “broadband” sound i.e. the sound level accounts for sound across all frequencies, noting again that a particular animal may not be able to detect all of the sound frequencies and associated energy that are emitted.

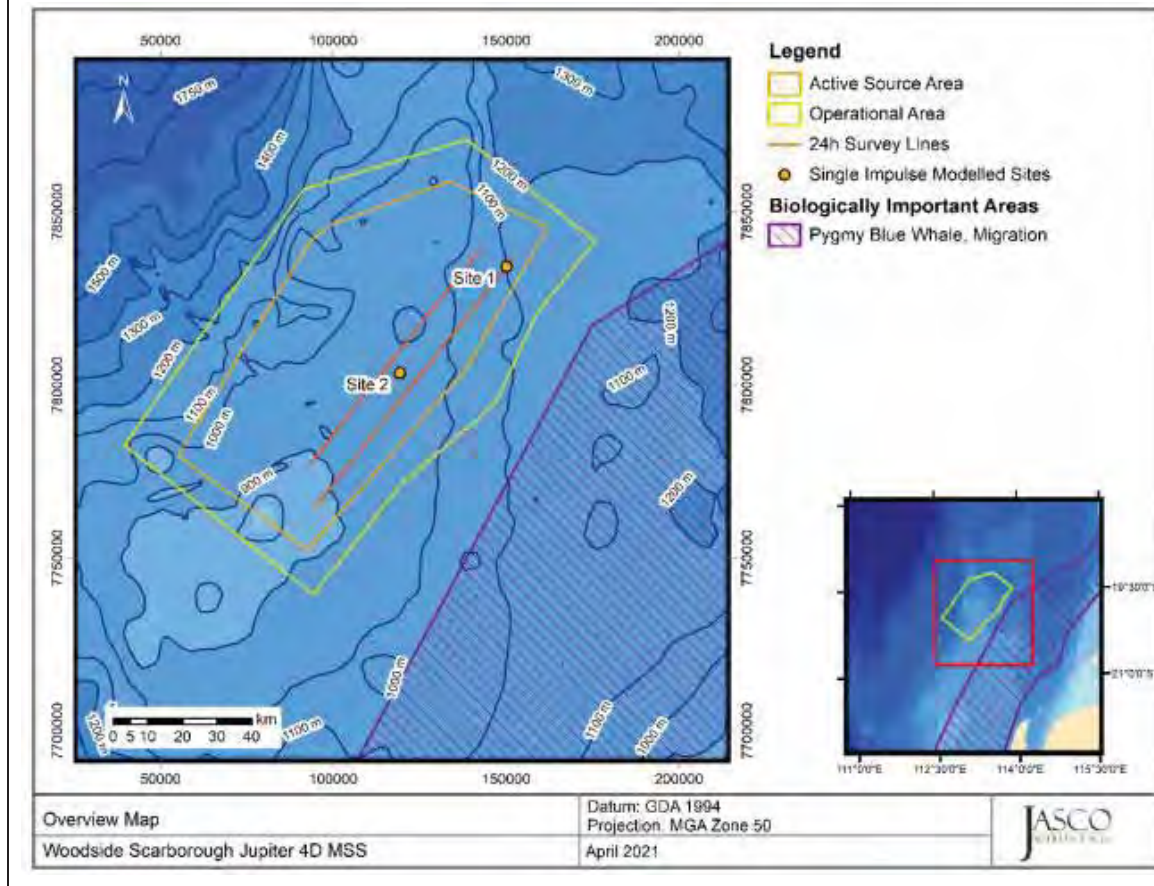
Therefore, the frequency of a sound and how sensitive different animals are to sound can make a considerable difference to how loud the sound is perceived to be and any resultant impact.

Acoustic modelling

To assess the potential magnitude and extent of impacts from underwater noise produced during the Petroleum Activities Program, Woodside commissioned JASCO Applied Sciences (JASCO) to model sound propagation at several locations that were representative of the different water depths, bathymetry and seabed properties within the Active Source Area (Koessler et al., 2021; **Appendix G**).

The objective of this acoustic modelling study was to evaluate the potential effects of sound (potential injury and behavioural disruption) to marine fauna including cetaceans, marine reptiles, fishes, elasmobranchs, and zooplankton. The modelling also provides information to support the evaluation of potential effects of sound on socio-economic receptors such as commercial fisheries and marine protected areas.

Two standalone single-impulse sites were modelled and used to model one scenario for survey operations over 24 hours to assess accumulated SEL. The modelled sites and acquisition lines are shown in **Figure 6-2** along with the survey boundaries and other areas of interest. The accumulated SEL scenario assumed that a survey vessel sailed along survey lines at ~4.5 knots, with an impulse interval of 12.5 m. The locations of the single impulse sites were selected to cover a range of water depths along the survey lines that will be acquired during the Scarborough 4D B1 MSS, and the potential sound propagation characteristics that may arise during acquisition.



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Figure 6-2: Overview of the modelled sites, acquisition lines, and features for the Scarborough 4D B1 MSS (Koessler et al., 2021)

Contours of the modelled underwater sound fields were computed, sampled either as the maximum value over all modelled depths (maximum-over-depth: MOD) or at the seafloor for the two single pulse locations, and one cumulative SEL_{24h} scenario. The modelled distances to each of the sound exposure thresholds for marine fauna were computed from these contours.

Two distances relative to the source are reported for each sound level:

- R_{max} - the maximum range to the given sound level over all azimuths; and
- R_{95%} - the range to the given sound level after the 5% farthest points were excluded.

The difference between R_{max} and R_{95%} depends on the source directivity and the non-uniformity of the acoustic environment. In some environments a sound level contour might have small anomalous isolated fringes in which case the use of R_{max} can misrepresent the area of the region exposed to such effects. In these instances R_{95%} is considered more representative. In environments that have bathymetric features that affect sound propagation then the R_{95%} may neglect to account for these and therefore R_{max} might better represent the region of effect in specific directions. For this impact assessment the R_{max} values have been considered. In many of the impact assessments, the maximum R_{max} values resulting from the various modelling sites have been referenced (unless specified) which provides a further level of conservatism to the assessment.

The results of the acoustic modelling are presented in relation to the sound exposure thresholds relevant to each receptor group assessed below. The detailed results are provided in the acoustic modelling report (Koessler et al., 2021; **Appendix G**).

Animal movement and exposure modelling (ANIMAT modelling)

In addition to the propagation modelling outlined above, Woodside commissioned JASCO to perform an acoustic exposure analysis study for pygmy blue whales (*Balaenoptera musculus brevicauda*) within the migration BIA to investigate any potential effects on pygmy blue whale migration from the Scarborough 4D B1 MSS (Koessler et al., 2021; **Appendix G**). Detailed information on pygmy blue whales was derived from a range of sources that used multi-sensor tags to record fine-scale dive and movement behaviour (Owen et al., 2016; Möller et al., 2020). Where information was unavailable for pygmy blue whales, parameters were derived from blue whale (*B. musculus*) tagging data (Goldbogen et al., 2011).

Sound exposure distribution estimates were determined by moving large numbers of simulated animals (animats) through a modelled time-evolving sound field, computed using the existing sound source and sound propagation model (Koessler et al., 2021). This approach provides the most realistic prediction of the maximum expected root-mean-square sound pressure level (SPL) and peak pressure level (PK), and the temporal accumulation of sound exposure level (SEL) that are now considered the most relevant sound metrics for impact assessment.

The acoustic exposure analysis and animal movement (animat) scenario was modelled for a seven day period, with the spatial distribution of animats restricted to the migration BIA, and the same vessel speed and impulse interval as the accumulated SEL scenario discussed above. On each day, a 24-hour segment of the planned seismic track lines was run. **Figure 6-3** shows the geographic features associated with the modelled animat scenario. The results of the ANIMAT modelling are discussed below, and detailed results are provided in the acoustic modelling report (Koessler et al., 2021; **Appendix G**).

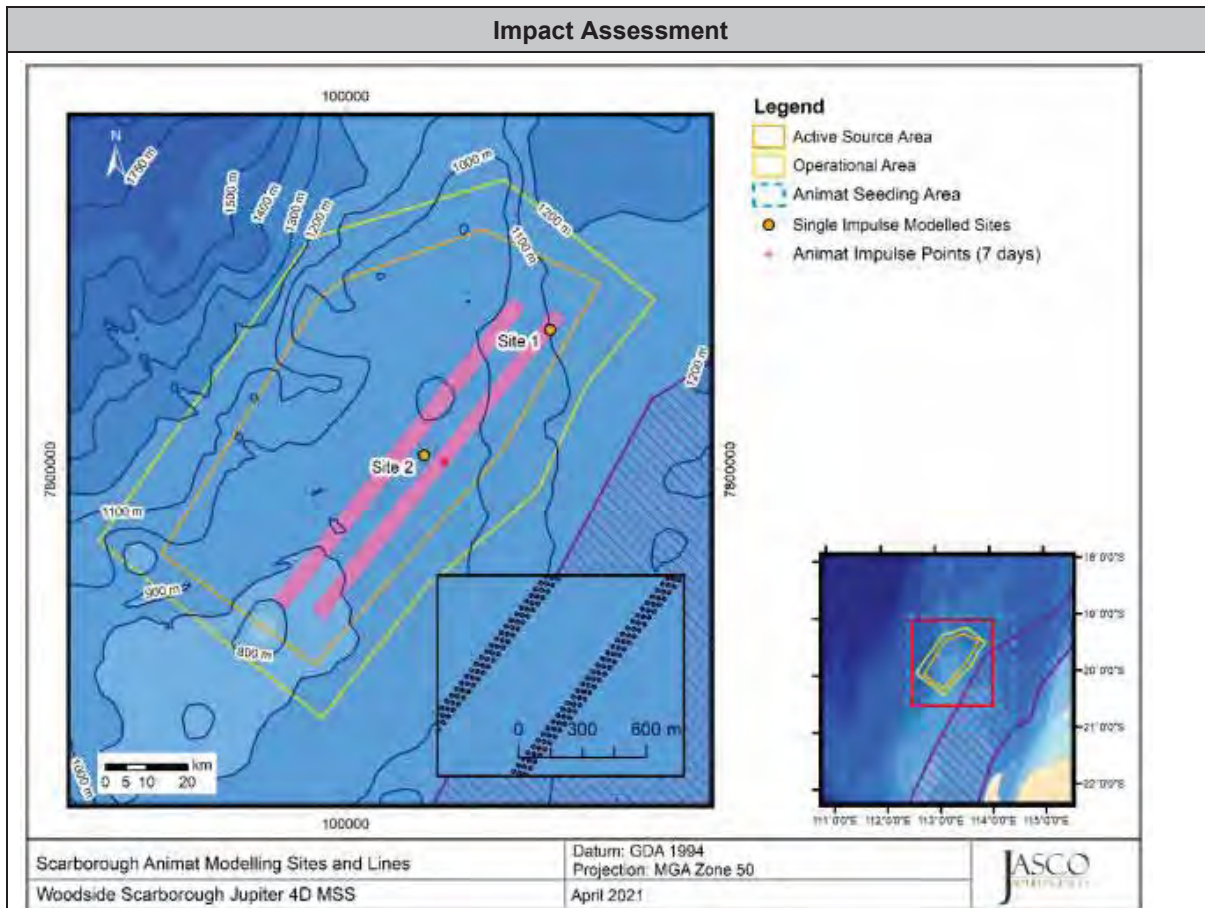


Figure 6-3: Overview of the features for the pygmy blue whale exposure modelling for the Scarborough 4D B1 MSS (Koessler et al., 2021)

Zooplankton

Species sensitivity and sound exposure thresholds

Plankton is a collective term for all marine organisms that are unable to swim against a current. This group is diverse and includes phytoplankton (plants) and zooplankton (animals), as well as fish and invertebrate eggs and larvae. There is no scientific information on the potential for noise-induced effect in phytoplankton and no functional cause-effect relationship has been established. Noise-induced effects on zooplankton, such as copepods, cladocerans, chaetognaths and euphausiids, have been investigated in a number of sound exposure experiments.

Zooplankton includes fish eggs and larvae that are transported by currents and winds and hence cannot take evasive behaviour to avoid seismic sources. Larval fish species studied appear to have hearing frequency ranges similar to those of adults and similar acoustic startle thresholds (Popper et al., 2014). Swim bladders may develop during the larval stage and may render larvae susceptible to pressure-related injuries such as barotrauma. Effects of sound upon eggs, and larvae containing gas bubbles, is focused on barotrauma rather than hearing (Popper et al., 2014). Larval stages are often considered more sensitive to stressors than adult stages, but exposure to seismic sound reveals no differences in larval mortality or abundance for fish, crabs or scallops (Carroll et al., 2017).

Parry et al. (2002) studied the abundance of plankton after exposure to airgun sounds but found no evidence of mortality or changes in catch-rate at a population-level. Other studies have also noted limited negative impacts on zooplankton, fish eggs, larvae or fry, and most have reported that impacts occur within a few metres or tens of metres from the source (Kostyuchenko, 1973; Dalen and Knutsen, 1987; Holliday et al., 1987; Kosheleva, 1992; Pearson et al., 1994; Turnpenny and Nedwell, 1994; Booman et al., 1996; Payne, 2004; Payne et al., 2009). These studies included exposures to sound pressures up to approximately 242 dB re 1 μ Pa, comparable to those predicted in close range to the Scarborough 4D B1 MSS seismic source.

McCauley et al. (2017) found that after exposure to airgun sounds generated with a single airgun (150 cui) zooplankton abundance decreased and mortality in adult and larval zooplankton increased two-to three fold when compared with controls. In this large-scale field experiment on the impact of seismic activity on zooplankton, a sonar

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and net tows were used to measure the effects on plankton, and a maximum effect-range of horizontal 1.2 km was determined. The findings contradicted the conventional idea of limited and very localised impact of intense sound in general, and seismic airgun signals in particular, on zooplankton, with the results indicating that there may be noise-induced effects on these taxa and that these effects may even be negatively affecting ocean ecosystem function and productivity.

The study measured zooplankton abundance and the proportion of the population that was dead at three distances from a single 150 cui airgun; 0 m, 200 m and 800 m. The experiment estimated the proportion of the zooplankton that was found to be dead, both before and after exposure to airgun noise, using net samples to measure zooplankton abundance, and bioacoustics to identify the distribution of zooplankton. In this study, copepods dominated the mesozooplankton (0.2–20 mm), and impacts were not assessed on microzooplankton (0.02–0.2 mm) or macrozooplankton (>20 mm).

McCauley et al. (2017) provide three findings from the experiment to show that zooplankton were affected by the seismic source:

- the proportion of the mesozooplankton community that was dead increased two- to three-fold;
- the abundance of zooplankton estimated by net samples declined by 64%; and
- the opening of a “hole” in the zooplankton backscatter observed via acoustics.

They found that exposure to airgun noise significantly decreased zooplankton abundance, and increased the mortality rate from a natural level of 19% per day to 45% per day (on the day of exposure, and that these impacts were observed out to the maximum range assessed (1.2 km) (McCauley et al., 2017).

Scientists from CSIRO’s Oceans and Atmosphere Business Units were contracted by APPEA to undertake a desktop study that: a) critically reviewed the methodologies and findings of the McCauley et al. (2017) experiment; and b) simulated the large scale impact of a seismic survey on zooplankton in the North West Shelf region, based on the mortality rate associated with airgun noise exposure reported by McCauley et al. (2017).

The CSIRO review of the McCauley et al. (2017) study found that there were three primary questions raised by the results of the experiment, all of which warrant further investigation (Richardson et al., 2017):

- Why was there no attenuation of the impact with distance? There is no consistent decline in the proportion of zooplankton that are dead with increasing distance away from the airgun. The energy of the sound waves at a distance of 1.2 km is substantially lower than at the source.
- Why was there an immediate decline in abundance? It is unclear why there would be a near immediate drop in zooplankton abundance as measured by net samples and acoustic data. If zooplankton were killed, they would not immediately sink from the surface layers, or be rapidly eaten. A drop in abundance would be more likely once the dead zooplankton either sunk to the bottom or were removed by predation.
- Was there sufficient replication to be confident in the study findings?

The conclusions made by McCauley et al. (2017) were based on a relatively small number of zooplankton samples. A total of 24 samples were collected – 2 tows each sampling time x 3 distances from the gun (0 m, 200 m, 800 m) x 2 levels (Control, Exposed) x 2 replicate experiments (Day 1, Day 2). Therefore, there were only 12 samples collected under conditions exposed to the airgun, six on each day of the two experiments. The major confounding explanation for this study is that a different water mass entered the area on each day of the experiment and had lower abundance and higher quantities of dead zooplankton. Richardson et al. (2017) concluded that: “although this is relatively unlikely it cannot be discounted because of the relatively few samples collected and only two replicate experiments conducted.”

Independently of the APPEA/CSIRO study, the International Association of Geophysical Contractors (IAGC) conducted its own review of the McCauley et al. (2017) paper. This review came to the following conclusion: “While we found the study interesting, we are also troubled by the small sample sizes, the large day-to-day variability in both the baseline and experimental data, and the large number of speculative conclusions that appear inconsistent with the data collected over a two-day period. Both statistically and methodologically, this project falls short of what would be needed to provide a convincing case for adverse effects from geophysical survey operations.” (IAGC, 2017).

The second component of the CSIRO study (Richardson et al., 2017) was to estimate the spatial and temporal impact of seismic activity on zooplankton on the North West Shelf from a large-scale seismic survey, considering mortality estimates of McCauley et al. (2017), and accounting for typical growth rates, natural mortality rates, and the ocean circulation in the region. The approach modelled a hypothetical 3D survey (2,900 km² in size, over a 35-day period, in water depths of 300-800 m) on the edge of the North West Shelf during summer. To simulate the movement of zooplankton by currents, the researchers used a hydrodynamic model that seeded 0.5 million particles into CSIRO’s Ocean Forecast Australia Model. Zooplankton particles could be hit multiple times by airgun pulses if they were carried by currents into the future survey path. The greatest limitation in this approach was accurate knowledge of the natural growth and mortality rates of zooplankton, and to address this the CSIRO researchers tested the sensitivity of

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the model to different recovery (growth-mortality) rates, and also the sensitivity of the results to ocean circulation by undertaking simulations with and without water motion (Richardson et al., 2017).

The results of the simulations, that included ocean circulation, showed that the impact of the seismic survey on zooplankton biomass was greatest in the Survey Region (defined as the survey Acquisition Area with a 2.5 km impact zone around it) (22% of the zooplankton biomass was removed) and declines as one moves beyond it to the Survey Region + 15 km (14% of biomass removed), and the Survey Region + 150 km (2% of biomass removed). The time to recovery (to 95% of the original level) for the Survey Region and Survey Region + 15 km recovery was 39 days (38–42 days) after the start of the survey and 3 days (2–6 days) after the end of the survey (Richardson et al., 2017).

The major findings of the CSIRO study were that there was substantial impact of seismic activity on zooplankton populations on a local scale within or close to the survey area, however, on a regional scale the impacts were minimal and were not discernible over the entire North West Shelf bioregion. Additionally, the study found that the time for the zooplankton biomass to recover to pre-seismic levels inside the survey area, and within 15 km of the area, was only three days following the completion of the survey. This relatively quick recovery was due to the fast growth rates of zooplankton, and the dispersal and mixing of zooplankton from both inside and outside of the impacted region (Richardson et al., 2017).

A more recent study by Fields et al. (2019) exposed zooplankton (copepods) to seismic pulses at various distances up to 25 m from a seismic source. The source levels produced were estimated to be 221 dB re $\mu\text{Pa}^2\cdot\text{s}$. The study observed an increase in immediate mortality rates of up to 30% of copepods in samples compared to controls at distances of 5 m or less from the airguns. Mortality one week after exposure was significantly higher by 9% relative to controls in the copepods placed 10 m from the airguns. Fields et al. (2019) also reported no sub-lethal effects of seismic exposure to the copepods. These findings of the study are consistent with numerous other field studies referenced above, indicating that the potential effects of seismic pulses to zooplankton are limited to within approximately 10 m from the seismic source. Fields et al. (2019) note that the findings of the McCauley et al. (2017) study are difficult to reconcile with the body of other available research. The findings of the McCauley et al. (2017) study may, therefore, provide an overly conservative estimate of the potential effects of seismic pulses to zooplankton.

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For this impact assessment the sound exposure thresholds for mortality/potential mortal injury (PMI) to fish eggs and larvae from Popper et al. (2014) were applied and consider both PK and $\text{SEL}_{24\text{h}}$ metrics (refer to **Table 6-2**). The thresholds were based on limited data, and were selected on the basis that Popper et al. (2014) note that they are likely to be conservative. While research generally suggests limited impacts to plankton beyond approximately 10 m distance from seismic sources, the precautionary Popper et al. (2014) thresholds for larval mortality / PMI have been selected to indicate the magnitude and extent of potential impacts from the survey.

Table 6-2: Maximum predicted distance (R_{max}) to mortality/PMI thresholds in the water column for fish eggs and larvae, and zooplankton

Sound Exposure Threshold	R_{max} distance (km)
207 dB re 1 μPa (PK)	0.11
210 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ ($\text{SEL}_{24\text{h}}$)	0.05

As shown in **Table 6-2**, the maximum distance (R_{max}) to mortality/PMI thresholds for fish eggs and larvae, and zooplankton, applying the single pulse (PK) 207 dB re 1 μPa threshold from Popper et al. (2014) is 110 m.

Any potential mortality/PMI impacts to zooplankton communities have to be assessed in the context of natural mortality in these populations. Any mortality or mortal injury effects to zooplankton (including fish eggs and larvae) resulting from seismic noise emissions are likely to be inconsequential compared to natural mortality rates, which are very high—exceeding 50% per day in some species and commonly exceeding 10% per day (Tang et al., 2014). For example, in a review of mortality estimates (Houde and Zastrow, 1993), the mean mortality rate for marine fish larvae was $M = 0.24$, a rate equivalent to a loss of 21.3% per day. In the experiment undertaken by McCauley et al. (2017) zooplankton mortality rate background levels were 19%. Sætre and Ona (1996) calculated that under the 'worst-case' scenario, the number of larvae killed during a typical seismic survey was 0.45% of the total population, and they concluded that mortality rates caused by exposure to airgun sounds are so low compared to natural mortality that the impact from seismic surveys must be regarded as insignificant.

The magnitude of such localised impacts (≤ 110 m from the seismic source) is negligible and is not expected to be discernible at the regional scale when considering the large natural spatial and temporal variability and scale of plankton and spawning biomass in the NWMR. In particular, phytoplankton and zooplankton biomass in the oceans can vary significantly at spatial scales ranging from hundreds of metres to hundreds of kilometres and temporal scales of hours, days, seasons and inter-annually, due to tidal and large scale currents, bathymetry, temperature, salinity, water chemistry parameters and other environmental factors (Gibbons and Hutchings, 1996; Holliday et al., 2011; McKinnon et al., 2008; Pearce et al., 2000; Sutton and Beckley, 2017). Therefore, changes in zooplankton abundance are likely to be replenished and indistinguishable from natural levels and distributions within hours of a seismic survey

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vessel passing. Furthermore, impacts to predator/ prey interactions, given the highly localised impact (<110 m from seismic source) and temporary nature of the impacts (hours), are unlikely.

Zooplankton – Impact Assessment Conclusion

The potential impacts of noise emissions from the seismic source on zooplankton during the seismic acquisition are considered to be slight and short-term, and the activity is not likely to result in any ecologically significant impacts at a population level for any zooplankton, fish eggs or larvae that may be present in the water column within or adjacent to the Operational Area. The Exmouth Plateau KEF is recognised as an area of upwelling of deeper, nutrient rich waters to the surface. These upwelling events experience high natural variability and therefore it is expected any impacts to zooplankton will be minimal at a regional scale and unlikely to result in impacts to high order trophic levels.

Benthic Invertebrates

Species Sensitivity and Sound Exposure Thresholds

Research is ongoing into the relationship between sound and its effects on benthic invertebrates, including the relevant metrics for both effect and impact. Marine invertebrates lack a gas-filled bladder and are unable to detect the pressure component of sound waves (Parry and Gason, 2006; Carroll et al., 2017) or “hear” sound in the way that mammals and fish are able to. Instead, invertebrates detect sound by sensing the particle motion component of sound in water and seabed sediments through physiological structures such as sensory hairs, statocysts and muscles, and therefore detect sound at close range (McCauley, 1994; Parry and Gason, 2006; André et al., 2016; Roberts et al., 2016; Edmonds et al., 2016; Carroll et al., 2017; Popper and Hawkins, 2018).

Statocysts, found in a wide range of invertebrates, are utilised by animals to maintain their orientation, direct their movements through the water and may play a key role in controlling the behaviour responses of invertebrates to a wide range of stimuli. Although directly sensitive to particle motion and not to sound pressure, most available research on seismic impacts to invertebrates characterises received sound levels in terms of the sound pressure. Therefore, available literature suggests particle motion, rather than sound pressure, is a more important factor for benthic invertebrates such as crustacean and molluscs. Water depth and seismic source size are related to the particle motion levels at the seafloor, with larger arrays and shallower water being related to higher particle motion levels, thus more relevant to effects on crustaceans and bivalves (Koessler et al., 2021; **Appendix G**).

A range of physiological responses have been identified in some studies; however, the received sound levels are typically at levels that would be received within tens or a few hundred metres from the sound source or have been from repeated exposure at the same sound levels, which is not typical of an actual seismic survey (Carroll et al., 2017; Edmonds et al., 2016; Salgado Kent et al., 2016; Webster et al., 2018).

Studies by Christian et al. (2003), DFO (2004) and Payne et al. (2007, 2008) have exposed crustaceans to seismic sound levels of approximately 197–237 dB re 1 μ Pa PK-PK. No acute or chronic lethal or sub-lethal effects were observed in the weeks to months following exposure, with the exception of Payne et al. (2007, 2008) who noted a decrease in serum enzymes and an increase in food consumption in the weeks to months post exposure, which may indicate stress effects or potential osmo-regulatory disturbance.

Research undertaken by Day et al. (2016a, 2016b) in Australian waters exposed captive southern rock lobster (*Jasus edwardsii*) to multiple passes of a seismic source element in 10-12 m water depths. Maximum received sound exposures were 209-212 dB re 1 μ Pa PK-PK, 186 to 190 dB re 1 μ Pa²-s per-pulse SEL, and SEL_{cum} of 192 to 199 dB re μ Pa²-s. Exposed lobsters and control lobsters were sampled up to a year post-exposure. The findings of the study are as follows:

- Exposure to seismic sound did not result in any mortalities to adult lobsters.
- Some potential sub-lethal changes in adult lobsters were observed, including some long-term impairment to lobsters’ statocysts, which was also linked to a short delay in the lobsters’ ability to right themselves when upturned.
- Haemocyte count (indicative of immune response function) also showed some evidence of decline over time.
- The condition or development of eggs carried by female lobsters at the time of exposure, even at close proximity directly beneath the seismic source, were not affected.

The significance of the seismic exposures and whether the sub-lethal effects may have wider ecological implications (e.g. ability to feed, avoid predators and resist disease) warrants further consideration. Day et al. (2016a, 2016b) reported that some of the control lobsters used in the experiments were collected from a marine reserve and were found to have a high level of pre-existing impairment to statocysts similar to that induced by the seismic exposure experiments, which was considered to be the result of long-term exposure to shipping noise. Some experiments showed no significant differences in righting times between control and exposed lobsters, while in some instances the control lobsters demonstrated slower righting times than exposed lobsters. Lobsters with pre-existing statocyst impairment demonstrated the fastest righting times of all experiments, which Day et al. (2016a, 2016b) suggested may indicate that lobsters are able to adapt or compensate for long-term statocyst impairment. Therefore, the level of statocyst impairment resulting from seismic exposure is not clear. Monitoring of the lobster population at the same

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reserve where the lobsters with pre-existing statocyst impairment were taken from showed that the rock lobster population within the reserve was thriving and at carrying capacity (Green and Gardner, 2009; Kordjazi et al., 2015). Therefore, the levels of statocyst impairment reported in the Day et al. (2016a, 2016b) study does not appear to be impacting on the survival of the lobster population, and any population-level survivability effects from statocyst impairment are not significant and wider ecological implications are likely to be negligible.

More recently Day et al. (2019) concluded that airgun exposure did cause damage to the righting reflect and statocysts in rock lobsters (*Jasus edwardsii*). Following exposure equivalent to a full-scale commercial array (3100 cui) passing within 100–500 m, lobsters showed impaired righting and significant damage to the sensory hairs of the statocyst. Reflex impairment and statocyst damage persisted up to 365 days post-exposure and did not improve following moulting. For this study, maximum measured received noise levels were 209–213 dB re 1 μPa (PK-PK).

Day et al. (2021) examined the potential impacts of seismic surveys on the larval stages of southern rock lobster (*Jasus edwardsii*) to determine whether early development and recruitment may be affected. Lobster puerulus (post-larval stage) and juveniles were held in baskets and exposed to multiple passes of a seismic source element in 10–12 m water depths. Maximum received sound exposures were 203–219 dB re 1 μPa PK-PK, 181 to 190 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ per-pulse SEL, and SEL_{cum} of 201 to 205 dB re $\mu\text{Pa}^2\cdot\text{s}$, comparable to Day et al. (2016a, 2016b) (Day et al., 2021). Lobster puerulus were randomly assigned to control (not exposed to airgun signals) or E0 (exposed to airgun signals at a nominal range of 0 m from the sail line), and juveniles were assigned to control, E0 and E500 (exposed to airgun signals at a nominal range of 500 m from the vessel sail line). The findings of the study are as follows:

- Exposure did not result in any elevated mortality for puerulus or juveniles.
- Righting was significantly impaired for all exposure treatments immediately after exposure, indicating that the range of impact extended to at least 500 m from the source (maximum range tested in the study).
- Puerulus and juvenile E0 treatment lobsters did not show the capacity for recovery, while juvenile E500 lobsters recovered from impairment after the first moult, providing evidence of a range threshold for recovery.
- Intermoult period was significantly increased in E0 juvenile lobsters, and appeared to be increased in puerulus, while juvenile E500 treatment lobsters show a moderate, non-significant increase in moult duration.
- Increased intermoult duration suggested impacted development and potentially slowed growth, and physiological stress.

Kosheleva (1992) identified no detectable effects to marine bivalves and gastropods (mussels and periwinkles) after exposure to a single seismic source element of source level 233 dB re 1 μPa at a distance of 0.5 m or greater from the source. Conversely, Matishov (1992) reported a single scallop shell splitting in a sample of three scallops, but this was located 2 m beneath a seismic source element and therefore exposed to maximum sources levels (which is not representative of a typical commercial seismic survey).

Recent Australian studies (Przeslawski et al., 2016, 2018; Day et al., 2016b, 2017) have focused on commercial scallops (*Pecten fumatus*). Przeslawski et al. (2016, 2018) examined the short-term impacts on scallops and other marine invertebrates from a 2,530 in³ seismic array and found no evidence of mortality or change in condition following exposure to a seismic survey. Analysis of images and samples revealed some site-specific differences in scallop abundance, size, condition and assemblages, but these were not related to seismic operations. Day et al. (2016b, 2017) exposed scallops to maximum received sound exposures of up to 213 dB re 1 μPa PK-PK, 181 to 188 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ per-pulse SEL, and SEL_{cum} of 188 to 198 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$. The study also predicted ground acceleration of up to 37.57 m/s². Day et al. (2016b, 2017) concluded that exposures did not result in any immediate mass mortalities, however, repeated exposures resulted in a chronic increase in mortality over timeframes of approximately four months post-exposure, though not beyond naturally occurring rates of mortality. Separate experiments undertaken in 2013 and 2014 yielded mortalities of 3.6–3.8% in control scallops (no seismic exposure), 9.4–11.3% mortality in scallops exposed to a single pass of the seismic source, 11.3–16.1% mortality in scallops exposed to two passes of the seismic source, and 14.8–17.5% mortality in scallops exposed to four passes of the seismic source. The mortality rates were at the low end of the range of naturally occurring mortality rates documented in the wild, which range from 11–51% with a six year mean of 38% (Day et al., 2017). A third experiment in 2015 resulted in 100% mortality to both control scallops and exposed scallops, and accordingly was attributed to other causes and not to seismic exposure (Day et al., 2016b, 2017).

Sub-lethal effects to exposed scallops were also observed by Day et al. (2016b, 2017) indicating a compromised capacity for homeostasis and potential immunodeficiency over acute (hours to days) and chronic (months) timescales post exposure. Exposures did not elicit energetically expensive behaviours (i.e. extensive swimming or long periods of valve closure), but scallops showed significant changes in some behavioural patterns during exposure (e.g. “flinch” response) and an increase in recessing into sediment following exposure (Day et al., 2017).

Published sound exposure criteria do not currently exist for acoustic impacts to invertebrates but the available literature above provides an indication of the sound levels and distances within which some impacts may occur. A range of sound levels, from 202 dB re 1 μPa PK-PK to 212 dB re 1 μPa PK-PK, based on the findings of the Payne et al. (2008) and Day et al. (2016a, 2016b) studies, were applied in the assessment. The Payne et al. (2008) 202 dB re 1 μPa PK-PK is considered to be associated with no impacts to benthic crustaceans (such as prawns, scampi and

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lobsters), whereas the 209-212 re 1 μ Pa PK-PK thresholds could be associated with some level of sub-lethal effects in these animals (Koessler et al., 2021). A 213 dB re 1 μ Pa PK-PK level is considered as representative of levels that may result in sub-lethal effects and chronic mortality in molluscs and some other invertebrates based on Day et al. (2016b, 2017). A PK sound level of 226 dB re 1 μ Pa PK was applied for sponges, based on a study where corals and sponges received maximum sound pressure levels of 226-232 dB re 1 μ Pa PK-PK, but no mortality, damage to soft tissue or skeletal integrity, visible signs of stress, change in abundance or community structure was detected immediately after, and up to four months following exposure (Heyward et al., 2018).

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The benthic habitats and communities present in the Operational Area are likely to be related to the water depth. As described in **Section 4.5**, the Operational Area is located entirely on the Exmouth Plateau KEF. The benthic communities associated with the water depths of the Operational Area (>800 m) include mostly echinoderms (e.g. sea cucumbers and sea stars), with benthic filter feeders and other epifauna likely present, although diversity and abundance is expected to be low. The substrate in these water depths is comprised of fine grain soft sediments, with a lack of hard substrate.

The seismic source will not be operated in shallow water areas where benthic communities are likely to be more diverse than in deeper waters. Seafloor sound levels and ranges were not specifically assessed in the noise modelling report; however, Koessler et al. (2021) note that the distribution of the sound within the water column indicates the ranges at the seafloor would not exceed the reported maximum-over-depth distances. Given the water depths of the Active Source Area (>800 m), it is likely that the ranges at the seafloor are less than the maximum-over-depth distances. Adjusting the PK levels reported in Koessler et al. (2021) by 6 dB (double the sound pressure) to convert to PK-PK levels, the Payne et al. (2008) 202 dB re 1 μ Pa PK-PK level associated with no impacts to benthic crustaceans is equivalent to 196 dB re 1 μ Pa PK, which has reported maximum-over-depth distance of 390 m. Similarly, converting the higher PK-PK levels that may result in sub-lethal effects to crustaceans and sub-lethal effects and chronic mortality in molluscs, suggests a maximum-over-depth distance in Koessler et al. (2021) of up to a few tens of metres. The effects ranges on the seafloor are likely to be less and may not be exceeded. The 226 dB re 1 μ Pa PK level is not expected to be exceeded at the seafloor and so deep water sponges or other similar filter-feeders that may be present in low abundance in the Operational Area will not be impacted.

Given the low diversity benthic communities present in the Operational Area, and the likely received sound levels on the seafloor in the >800 m water depths, impacts to benthic invertebrate communities on the seafloor are expected to be highly localised and temporary. Any impacts are likely to occur in parallel with the continuous natural cycle of death, recovery and recruitment of invertebrates, and therefore it is questionable whether any impacts from seismic exposure would be detectable from natural fluctuations in relative abundance, benthic community composition and structure (Day et al., 2017; Payne et al., 2007, 2008).

It is acknowledged that crystal crabs (also commonly known in Australia as snow crab), a commercial crab species targeted by the West Coast Deep Sea Crustacean Fishery, have been recorded off the west coast of WA in water depths of 300–1200 m (How et al., 2015) and so are considered in this assessment due to having the potential to occur within the Operational Area. However, the species core depth range is 500–800 m and the Ningaloo/North-west Cape region is understood to represent the species' most northerly extent (How et al., 2015). Egg-bearing females also tend to be found in greater abundance in water depths of less than 700 m (How et al., 2015). While some fishing effort was reported on the Exmouth Plateau between 2003 and 2010 (How et al., 2015), reported effort was low (potentially an isolated event) and based on 2010–2019 FishCube data, no fishing effort has been reported here since. Based on this information, it is unlikely that the Operational Area supports any significant numbers of crystal crab.

A study specifically into the effects of seismic on snow crabs (Christian et al., 2003, 2004) exposed captive adult male crabs and egg-bearing female crabs to approximately 197–237 dB re 1 μ Pa PK. The crabs were exposed to 200 pulses over a 33-minute period. No acute or chronic (12-weeks post-exposure) mortality impacts were observed in the adult crabs. Stress indicators in the snow crabs also showed no evidence of significant acute or chronic impacts. The crabs also did not exhibit any overt startle response during the exposure period or avoidance of the area following exposure.

Given the Operational Area is unlikely to support significant numbers of crystal crab and the limited reported effects of seismic to crustaceans, including to egg-bearing female crabs reported in Christian et al., (2003, 2004), no impacts to the commercial crystal crab stock are expected.

Benthic invertebrates – Impact Assessment Conclusion

Impacts to benthic invertebrates from noise emissions from the seismic source during the acquisition of the survey include potential sub-lethal effects and chronic mortality to some organisms within a few tens of metres below the source. However, given the water depths (>800 m), natural cycle of death, recovery and recruitment, impacts are expected to be slight and short-term, and the activity is not likely to result in any ecologically significant impacts at a population level for any benthic invertebrates that may be present on the seafloor within or adjacent to the Active Source Area.

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Fish, Sharks and Rays

Species Sensitivity and Sound Exposure Thresholds

Every species of fish studied to date is able to hear. Fish produce sounds in a wide range of context such as feeding, mating or fighting, and as a result anything that inhibits the detection of these sounds can have a negative effect on their fitness and survival (Popper and Hawkins, 2019). The majority of fish species detect sounds from <50 Hz up to 500-1,500 Hz (Popper and Hawkins, 2019). A smaller number of species can detect sounds over 3 kHz, while very few species can detect ultrasound over 100 kHz (Ladich and Fay, 2013). The critical issue for understanding whether an anthropogenic sound will affect the hearing of a fish is whether it is within the hearing frequency range of the fish and loud enough to be detectable above background ambient noise.

The hearing sensitivity of fishes varies depending upon the auditory structures in the inner ear (otoliths surrounded by an epithelium of hair cells) and, if present, the swim bladder (Finneran and Hastings 2000; Nedwell et al., 2004). Otoliths are sensitive only to particle motion, while the swim bladder may provide an indirect route for sound pressure to reach the inner ear. The other main mechano-reception system in fishes is the lateral line system, which runs along the side of the body and is more pronounced in some groups of fish than others. The lateral line system responds to particle motion produced in the near-field of a sound source, as well as to tiny water currents set up by the motions of the fish (Nedwell et al., 2004), therefore all fish are sensitive to the particle motion component of sound at close range from a sound source. Particle motion is the most relevant metric for perceiving underwater sound for most species, but with the exception of a few species (Popper and Fay, 2011; Popper et al., 2014), there is an almost complete lack of relevant data on particle motion sensitivity in fishes (Popper and Hawkins, 2018). Some more specialised fish with a swim bladder that they use for hearing are sensitive to sound pressure and are capable of detecting less intense noise and a wider range of frequencies, compared to less-specialised groups of fish (Popper et al., 2014; Carroll et al., 2017; Hawkins and Popper, 2017). The susceptibility of fishes to injury from noise exposure varies depending on the species and the presence and possible role of a swim bladder in hearing.

In marine fishes, the connection with the swim bladder and ability to detect sound pressure is understood to be present to some varying degree in the families Clupeidae (e.g. herrings, sardines, pilchards and shads), Gadidae (e.g. true cods such as Atlantic cod and whiting), and some nearshore/reef species relevant to tropical Australia, including some species in the families Pomacentridae (e.g. damsel fishes and clown fishes), Holocentridae (soldierfishes and squirrelfishes) and Haemulidae (e.g. grunters and sweetlips) (Nedwell et al., 2004; Braun and Grande, 2008; Popper et al., 2014; Popper and Hawkins, 2018, 2019). However, the vast majority of marine fish species do not have this hearing specialisation.

A great many fish species possess a swim bladder or other gas-filled cavity but do not have a connection with their hearing, for example various demersal snapper, emperor and cod. Fish species that lack a gas-filled cavity altogether include elasmobranchs (e.g. sharks and rays), some flat fishes, some tunas, and mackerels (Casper et al., 2012; Popper et al. 2014).

The sound exposure thresholds applied for fish and elasmobranchs (sharks and rays) in the acoustic modelling study and in this impact assessment are summarised in **Table 6-3** and explained in more detail in the acoustic modelling report (Koessler et al., 2021). The modelling study assessed the ranges for quantitative threshold criteria based on the Popper et al. (2014) guidelines for three types of immediate effects to fish:

- Mortality, including injury leading to death.
- Recoverable injury, including injuries unlikely to result in mortality, such as hair cell damage and minor haematoma.
- TTS.

The modelling study considered single pulse (PK) and multiple pulse (SEL_{24h}) metrics for both the entire water column and seafloor in the following categories reflective of the different hearing mechanisms and sensitivity to sound:

- I - Fish without a swim bladder (also appropriate for sharks in the absence of other information).
- II - Fish with a swim bladder that do not use it for hearing.
- III - Fish that use their swim bladders for hearing.

For this impact assessment, it is assumed that all fish can detect signals below 500 Hz and so can 'hear' the seismic source.

Table 6-3: Thresholds for seismic sound exposure for fish, adopted from Popper et al. (2014)

Type	Mortality and Potential Mortality Injury	Impairment			Behaviour
		Recoverable Injury	TTS	Masking	
I Fish:	>219 dB SEL _{24h}	>216 dB SEL _{24h}	>>186 dB SEL _{24h}	(N) Low	(N) High

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No swim bladder (particle motion detection)	or >213 dB PK	or >213 dB PK		(I) Low (F) Low	(I) Moderate (F) Low
II Fish: Swim bladder not involved in hearing (particle motion detection)	>210 dB SEL _{24h} or >207 dB PK	203 dB SEL _{24h} or >207 dB PK	>>186 dB SEL _{24h}	(N) Low (I) Low (F) Low	(N) High (I) Moderate (F) Low
III Fish: Swim bladder involved in hearing (primarily pressure detection)	207 dB SEL _{24h} or >207 dB PK	203 dB SEL _{24h} or >207 dB PK	186 dB SEL _{24h}	(N) Low (I) Low (F) Moderate	(N) High (I) High (F) Moderate

Notes: Peak sound level (PK) dB re 1 μ Pa; SEL_{24h} dB re 1 μ Pa²-s. All criteria are presented as sound pressure, even for fish without swim bladders, since no data for particle motion exist. Relative risk (high, moderate, or low) is given for animals at three distances from the source defined in relative terms as near (N – tens of metres), intermediate (I – hundreds of metres), and far (F – thousands of metres).

Mortality/Injury

It is noted that while thresholds for fish mortality have been included for consideration in this assessment based on the Popper et al. (2014) guidelines, no studies to date have demonstrated direct mortality of free-swimming adult fishes in response to airgun emissions, even when fired at close proximity (within 1–7 m) (DFO, 2004; Boeger et al., 2006; Popper et al., 2016; Carroll et al., 2017). Although some fish deaths have been reported during cage experiments, these were more likely caused by experimental artefacts of handling fish or confinement stress (Hassel et al., 2004). For free-swimming fishes that are able to move away from seismic sources as they approach, the potential for lethal physical damage from airgun emissions is even further nullified. However, reef or bottom-dwelling fish that show greater site attachment may be less inclined to flee from a seismic sound source and experience greater effects as a consequence.

Despite mortality being a possibility for fishes exposed to airgun sounds, Popper et al. (2014) did not reference an actual occurrence of this effect. At the time of developing the guidelines, no quantified data on injury and mortality from seismic sources on fish had been reviewed by the Working Group. Therefore, the Popper et al. (2014) exposure guidelines for mortality/potential mortal injury and recoverable injury for fish exposed to seismic source emissions are based solely on data from pile driving conducted on predominantly temperate, freshwater fish species. Although seismic surveys and pile driving both produce impulsive sound, their sound characteristics are markedly different; pile driving impulses result in a more rapid rise time in sound pressure than seismic pulses and it is this rapid rise time that has the greatest potential for trauma (Caltrans, 2001, 2004; Hastings and Popper, 2005; Popper et al., 2006).

Environmental Resources Management Australia (ERM) undertook a detailed literature review of potential fish mortality and physical injury as a result of exposure to seismic sources (ERM, 2017). Of the 28 studies reviewed, only three observed direct mortality and in each case, mortalities occurred to caged fishes at very close proximity to the seismic source (<2 m), which is not representative of real-life exposures from seismic surveys because fish are free-swimming and are not typically exposed at such close range. The received sound levels that resulted in mortality ranged from 220 to 241 dB re 1 μ Pa PK, however, other studies reported no mortality or injury at levels as high as 246 dB re 1 μ Pa PK. Therefore, the sound exposure criteria proposed by Popper et al. (2014) for mortality and injury are considered to be highly conservative and provide a precautionary approach in the assessment of potential injury and mortality effects to fishes from exposure to underwater noise from marine seismic surveys.

Temporary Threshold Shift

Temporary hearing impairment, known as temporary threshold shift (TTS), can occur due to fatigue and temporary changes to the epithelium (hair cells) of the inner ear and/or damage to auditory nerves innervating the ear, which has the potential to occur in some fishes exposed to intense sound pressures for prolonged periods of time (Smith et al., 2006; Popper et al., 2014; Liberman, 2015). While experiencing TTS, fishes may have a decrease in fitness in terms of communication, detecting predators or prey, and/or assessing their environment. The period over which normal hearing ability returns following the termination of a sound that causes TTS is variable, and dependent on many factors including the intensity and duration of sound exposure (e.g. Popper and Clarke, 1976; Scholik and Yan, 2001; Amoser and Ladich, 2000; Smith et al., 2004a, 2004b, 2006, 2011; Popper et al., 2005, 2007).

The impact threshold of 186 dB re 1 μ Pa²-s proposed by Popper et al. (2014) in **Table 6-3** is based on exposure of a freshwater fish species with a connection between the swim bladder and inner ear (more specialised hearing than the demersal and pelagic fish species likely to occur in the Scarborough 4D B1 MSS Operational Area). Fish that showed TTS recovered to normal hearing levels within 18–24 hours. Given that reliable auditory frequency weightings have

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not been defined for the three categories of fishes in the way they have for cetaceans, the 186 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ SEL_{24h} criteria in **Table 6-3** includes a level of conservatism as:

- Many types of fish that are likely to occur in the Operational Area do not possess a direct connection between the swim bladder and the inner ear; they are therefore sensitive primarily to particle motion rather than sound pressure and may be less sensitive than the types of fish upon which the 186 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ threshold is derived;
- Modelled SELs are based on broadband sounds and may therefore account for more sound energy associated with frequencies that are not within the auditory ranges of the fish species likely to occur in the Operational Area; and
- The main contribution of sound energy to the onset of TTS will occur over just a few hours when the source is at the closest point of approach; the 24-hour modelled accumulation period accounts for additional sound energy accumulated while the seismic source is at greater distances and potentially not audible to fishes.

It is also noted that many of the available studies on TTS are based on captive fish, whereas free-swimming fishes in the wild are likely to make some effort to avoid the intense sound pressures that contribute the most to the onset of TTS. If TTS does occur, the effects will be temporary and recoverable.

Behavioural Effects

Behavioural effects of noise on fish will vary depending on the circumstances of the fish, hearing sensitivity, the activities in which it is engaged, its motivation, and the context in which it is exposed to sounds (Hawkins and Popper, 2017). Responses may include avoidance behaviours, startle reactions, increased swimming speed, change in orientation, change in position in the water column, changes to schooling behaviour (e.g. tightening of school structure), and temporary avoidance of an area (Simmonds and MacLennan, 2005; McCauley et al., 2000a; Fewtrell and McCauley, 2012; Popper et al., 2014; Carroll et al., 2017). Changes in movement patterns may also temporarily divert efforts away from feeding, egg production and spawning success (Hawkins and Popper, 2017). The potential extent and duration of behavioural effects based on studies of seismic exposure are summarised below.

A degree of caution should be given when interpreting behavioural studies, given that many are conducted on captive fishes which may not provide an accurate representation of responses in free-swimming fishes in the wild (Popper et al., 2014; Salgado Kent et al., 2016; Carroll et al., 2017). Behavioural studies are also highly subjective. Extrapolation of observed effects on fish should also be undertaken with caution (Carroll et al., 2017). This is particularly the case given that many exposure experiments report received SPL or SEL, even though the most relevant metric for most fish species is particle motion (Popper and Hawkins, 2018, 2019). Many exposure experiments are undertaken using a single airgun and it is not clear how transferrable the behaviours and received SPL/SEL levels are to a full commercial-sized seismic array, particularly if observed behaviours are in response to particle motion close to the sound source rather than to sound pressure.

Pearson et al. (1992) exposed captive demersal rockfish to multiple 10-minute periods of seismic sound from a seismic source towed at distances of less than 215 m, which is not representative of real-life exposures to a seismic survey. Schools of rockfish were observed to exhibit a 'startle' response (shudders, flexions of the body followed by rapid swimming) at sound levels above 200-205 dB re 1 μPa SPL. An 'alarm' response (change in vertical position in the water column to be closer to the seabed, short-term post-exposure behavioural changes) was found to occur above approximately 180 dB re 1 μPa SPL, although it was suggested that some individuals may begin to exhibit subtle changes in behaviour and position in the water column at sound levels above 161 dB re 1 μPa SPL. Changes in behaviour were found to return to normal before the end of the sound exposure or within just minutes of the sound ceasing, indicating only very short-term, transient effects and potential habituation to the disturbance.

Santulli et al. (1999) exposed caged European sea bass (a demersal species) to a 2,500 in³ seismic source. Limited response was observed at 2.5 km distance, a startle response was observed when the array was at a distance of approximately 800 m, but after passing within 180 m, fish behaviour appeared to return to normal within one hour.

The Scott Reef Study associated with the Woodside Maxima 3D survey reported in McCauley et al. (2008), Miller and Cripps (2013), and summarised in Salgado-Kent et al. (2016), included a component that examined how the behaviour of caged fishes exposed to seismic signals changed. The study examined the effects to fish species in the Holocentridae family, which have adaptations linking the swim bladder to the otolith system of the inner ear, as well as to bluestripe snapper, a demersal species without such a hearing adaptation. Fish were exposed to either one or two passes of the active source at three distance categories (45–74 m, 105–131 m, 475–807 m). Alarm responses (including the startle response and behavioural avoidance) occurred within less than 200 m either side of the pass by, but responses were too infrequent to include in analyses. Less significant agitation levels (defined by changing swim direction) in Holocentridae increased with increasing received sound level above 155–165 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ SEL, but agitation levels did not seem to increase with increasing received sound levels for the less sensitive bluestripe snapper (McCauley et al., 2008). Fish began to feed and behave normally again within 20-minutes after the passage of the seismic source (McCauley et al., 2008; Miller and Cripps, 2013).

McCauley et al. (2000a, 2003) reported that trials involving captive fishes (of various species, including snappers, emperors, groupers, trevally, bream, herring and others) exposed to seismic sound showed a common 'startle' response (C-turns), 'alarm' responses (e.g. swimming faster, darting movements and sudden changes in school

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structure), or less obvious changes such as moving closer to the seabed or huddling closer together. Subtle responses such as moving closer to the seabed or changes in schooling behaviour were suggested to commence when sound levels exceeded approximately 147 - 151 dB re 1 $\mu\text{Pa}^2 \cdot \text{s}$ SEL. Similar behaviours in pink snapper and trevally were noted by Fewtrell and McCauley (2012) in response to comparable sound levels. These are minimal reactions that are likely to be an indication of awareness and perception of the sound rather than a response that could result in significant ecological impacts. More obvious startle and alarm responses were apparent in trials when received sound levels were in the order of 159-172 dB re 1 $\mu\text{Pa}^2 \cdot \text{s}$ SEL. In situations where a behavioural response was observed, fish were considered to have resumed normal behaviour within 4–31 minutes after cessation of the seismic activity (McCauley et al., 2000, 2003). Startle and alarm responses reduced with time, indicating some habituation to the sound. No statistically clear trends in physiological stress response were observed following exposure (McCauley et al., 2000, 2003).

Behavioural observations of two tropical snapper species and another coral reef fish species, spadefish, in field enclosures before, during and after exposure to seismic sound showed that repeated exposure resulted in increasingly less obvious startle responses (Boeger et al., 2006). This is consistent with the potential habituation suggested by McCauley et al. (2000a) and by Fewtrell and McCauley (2012).

McCauley and Salgado Kent (2007) observed the behaviour of goldband snapper in fish traps in the Timor Sea using cameras placed inside the fish traps. A seismic vessel towed two 3090 in³ seismic sources. Maximum signals reached at the closest trap to each seismic pass-by were 200, 202 and 212 dB re 1 μPa PK-PK (equivalent to approximately 194, 196 and 206 dB re 1 μPa PK). No dramatic behavioural responses of fishes to the passing seismic source were observed. Fishes generally displayed increased activity immediately after entering a trap presumably as they searched for a way out, with this activity reducing with time. Fishes that had been in a trap for some time showed increased activity levels as the operating seismic source approached but were 'quiet' when the array passed at the point of closest approach.

Bruce et al. (2018) tagged tiger flathead and two shark species, which were monitored during a seismic survey undertaken in Australian waters. Sharks moved freely in and out of the study area and exposed sharks did not show any indication of differences in behaviour or distribution compared with control areas. Minor behavioural effects were observed in exposed tiger flathead, which increased their swimming speed during the seismic survey and changed daily movement patterns after the survey, but showed no significant displacement. Overall, there was little evidence for consistent behavioural responses (Bruce et al., 2018).

Paxton et al. (2017) observed temperate reef fish, including snapper and grouper species, in 33 m water depths located 7.9 km from a seismic survey line using video recordings. The authors observed fish abundance and habitat use during the evening hours for three days prior to a seismic survey and then during the evening of the day when seismic activity occurred. The authors attempted to measure sound at two other reefs in closer proximity to the survey, but the hydrophones malfunctioned. No video recordings were made at the other reefs where hydrophone measurements were attempted. While no hydrophone measurements were made at the reef where video recordings took place, maximum sound levels were estimated to be in excess of 170 dB re 1 μPa SPL. Despite no clear visual evidence of behavioural responses in fishes during the seismic survey, the authors noted a 78% decline in abundance in the evening following the survey. No further recordings were made to assess when fish abundance returned to pre-exposure levels or how far they may have moved. Therefore, with limited data, it is not clear from this study if reduced abundance is attributed to the seismic sound or other natural factors such as tidal influence or food availability. However, the study may indicate a possible avoidance response and change in local abundance and distribution.

Meekan et al. (2021) studied the effects of seismic surveys on tropical demersal fishes targeted by commercial fisheries on the North West Shelf of WA. The authors found no short-term (days) or long-term (months) effects of seismic exposure on the composition, abundance, size structure, behaviour of movement of these species, suggesting that seismic surveys have little impact on demersal fishes in this environment (Meekan et al., 2021).

Many pelagic Scombroidei species, including some tuna species do not possess a swim bladder or it is poorly developed (Popper et al., 2014; Bray and Schultz, 2019a, 2019b), indicating they are sensitive only to the particle motion component of sound at close range to a sound source. Some other types of tuna, including southern bluefin tuna, yellowfin tuna, bigeye tuna and billfish have swim bladders but have no apparent specialist connection with the inner ear (Bertrand and Josse, 2000; Song et al., 2006). The lateral line system appears to feature in Scombroidei fishes, again indicating fishes are mainly sensitive to particle motion, but some pressure detection is possible. Song et al. (2006) note that unless bluefin tuna are exposed to very high intensity sounds from which they cannot swim away, short- and long-term effects may be minimal or non-existent. And, considering that bluefin tuna are powerful swimmers and divers, it is possible that if they encounter a sound that is very loud to them, they will move away from the sound rapidly enough to result in minimal exposure.

Some other studies looking at the behavioural response of sound pressure-sensitive Gadidae and Clupeidae species, such as whiting, Atlantic cod and herring, have reported changes in vertical position in the water column, potential avoidance responses and short-term changes in distribution. Chapman and Hawkins (1969) observed that the depth distribution of free-ranging whiting changed in response to an intermittently discharging stationary seismic source, which resulted in fish being exposed to an estimated SPL of 178 dB re 1 μPa . The fish school responded to the sound

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by shifting downward, forming a more compact layer at greater depth although temporary habituation was observed after one hour of continual sound exposure (Chapman and Hawkins, 1969).

Hawkins et al. (2014) exposed free-swimming sprat (a sound pressure-sensitive Clupeidae species with a swim bladder connected to the inner ear) and Atlantic mackerel (a particle motion detecting species without a swim bladder) to playback of impulsive sound. Sprat schools were more likely to disperse laterally in response to received sound levels of approximately 135 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ SEL. Mackerel schools were more likely to alter their depth in the water column in response to approximately 142 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ SEL. Hawkins et al. (2014) note how the two different species seemed to respond to the sound playback at similar sound levels despite the differences in sound sensitivity of the two species, but suggested that mackerel were simply more “flighty” than sprat and therefore more likely to react. The tests were also undertaken using low sound level playback in very close proximity to the schools of fish and it is not clear how relevant the sound pressure and sound exposure levels are in relation to mackerel given that their response was likely driven by particle motion. The study location, a very small, enclosed, quiet, coastal sea lough, where fishes were not accustomed to heavy disturbance from shipping and other intense sound sources is also very different from an open ocean location.

Slotte et al. (2004) monitored the effects of a 3,090 in³ seismic array on migrating herring (Clupeidae) and whiting (Gadidae), mapping their distribution and abundance in relation to the seismic survey lines. There was no significant evidence of immediate, near-field scaring reactions on the horizontal scale in response to acquiring survey lines, but there was some evidence that fish changed position in the water column, moving closer to the seabed. Some short-term changes in distribution were observed but weren’t statistically significant; fish consistently remained within the immediate vicinity of the survey area, but in a limited number of measurements there was an indication that fish abundance was lower near to the survey area and increased with distance out to a maximum range of 37 km. However, results were inconsistent and clear trends were not observed in all cases. Slotte et al. (2004) concluded that it was not possible to determine how much abundance and distribution were attributed to the seismic survey or to the natural migration patterns and food availability of the fish, or other natural factors. Herring and whiting were found to be abundant in the survey area again after a pause in seismic acquisition and monitoring of fishes for three to four days, indicating that if any displacement did occur as a result of seismic sound exposure, the displacement was temporary (i.e. less than three to four days) (Slotte et al., 2004).

In similar studies, Engås et al. (1996) and Engås and Løkkeborg (2002) reported on the effects of seismic surveys on Atlantic cod and haddock (Gadidae) and found that the abundance of fishes were lower in the survey area compared with areas outside of the survey area, which the authors hypothesize may be the result of an avoidance response. Some differences in abundance were still detectable within the survey area five days after the survey was completed (Engås et al., 1996; Engås and Løkkeborg, 2002).

Conversely, Peña et al. (2013) described the real-time behaviour of herring schools exposed to a full-scale 3D seismic survey, observed using sonar. No changes were observed in swimming speed, swimming direction, or school size that could be attributed to a transmitting seismic vessel as it approached from a distance of 27 km to 2 km, over a six hour period. The unexpected lack of a response to the seismic survey was interpreted as a combination of a strong motivation for feeding by the fishes, a lack of suddenness of the onset of sound, and an increased level of tolerance to seismic pulses.

Dauidsen et al. (2019) investigated the effects of seismic sound exposure on the physiology and behaviour of captive Atlantic cod (*Gadus morhua*) and saithe (*Pollachius virens*) using a combination of biologgers and acoustic tags, as well as video monitoring. Experimental sound exposures were 18–60 dB above ambient. Fish were held in a large sea cage and exposed over a 3-day period. The cod exhibited reduced heart rate in response to the particle motion component of the sound from the airgun, indicative of an initial flight response. No behavioural startle response to the airgun was observed; both cod and saithe changed both swimming depth and horizontal position more frequently during sound exposure. The saithe became more dispersed in response to the elevated sound levels. The fish seemed to habituate both physiologically and behaviourally with repeated exposure. The authors concluded that sound exposures induced over the time frames used in this study appear unlikely to be associated with long-term alterations in physiology or behaviour.

Hubert et al. (2020) exposed captive Atlantic cod to one hour of playback of seismic airgun sound pulses with a 10 second shot point interval. Cod were placed in a net pen positioned 7.8 m from the speaker. The mean peak sound pressure and particle acceleration levels at a distance of 9.7 m from the speaker were 164 dB re 1 μPa and 101 dB re 1 nm/s^2 respectively. At a distance of 16.4 m from the speaker, the mean peak sound pressure and particle acceleration levels were 158 dB re 1 μPa and 99 dB re 1 nm/s^2 respectively. These levels compare with a mean SPL of the ambient conditions in the pen of 113 dB re 1 μPa and a mean sound particle acceleration of 61 dB re 1 nm/s^2 . Results indicated no strong overall pattern of change in swimming patterns or immediate, short-term behaviours during the exposure, compared to baseline periods without playback. However, several individuals changed their time spent in several behavioural states during the one hour sound exposure. Several individuals spent more time transiting and less time being locally active or inactive. This may be indicative of changes in energy expenditure, which may be relevant if sound exposure occurs over the long term. However, due to experimental design limitations, it was not possible to test the significance of these behavioural state trends (Hubert et al., 2020).

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Van der Knaap (2021) investigated the effect of a 3.5-day, full-scale, seismic survey exposure on the movement behaviour of free-swimming Atlantic cod, using acoustic telemetry. The closest point of approach to the tagging location was 2.25 km. The study found that during the experimental survey, cod did not leave the detection area more than expected from baseline data. However, cod left more quickly than expected, from two days to two weeks after the seismic survey. Furthermore, behavioural analyses indicated that during the exposure cod decreased their activity, with time spent being locally active (moving over small distances, showing high body acceleration) becoming shorter, and time spent being inactive (moving over small distances, having low body acceleration) longer. Additionally, diurnal activity cycles were disrupted with lower locally active peaks at dusk and dawn, periods when cod is known to actively feed.

The following conclusions are made regarding behavioural effects to fish from seismic airguns, based on the literature above:

- Different fishes may exhibit different behavioural responses when exposed to seismic survey noise, depending on their activities, motivation and the context in which they receive sound.
- Fish may initially change position in the water column (i.e. move closer to the seabed) in response to becoming aware of approaching seismic sound, but this varies depending on hearing sensitivity and context (e.g. Pearson et al., 1992; McCauley et al., 2000, 2003; Slotte et al., 2004; Fewtrell and McCauley, 2012; Miller and Cripps, 2013; Davidsen et al., 2019).
- Exposure to higher sound levels at close range to a seismic source may begin to result in more noticeable startle or alarm responses, such as changes in school structure, increased swimming speed and avoidance of the sound source (typically observed within hundreds of metres of the seismic source) depending on hearing sensitivity and context (e.g. Simmonds and MacLennan, 2005; McCauley et al., 2000, 2003; Fewtrell and McCauley, 2012; Popper et al., 2014; Carroll et al., 2017).
- Many exposure experiments are undertaken using a single airgun and it is not clear how transferrable the behaviours and received SPL/SEL levels are to a full commercial-sized seismic array, particularly if observed behaviours are in response to particle motion close to the sound source rather than to sound pressure.
- There is some evidence that fish may tolerate gradual increases in sound levels and habituate to repeated sound exposures (Chapman and Hawkins, 1969; McCauley et al., 2000; Boeger et al., 2006; Fewtrell and McCauley, 2012; Peña et al., 2013; Davidsen et al., 2019).
- Many studies indicate that fishes resume normal behaviour shortly after cessation of the acoustic disturbance (within minutes / less than an hour), with no evidence of long-term changes (e.g. Wardle et al., 2001; Pearson et al., 1992; Santulli et al., 1999; McCauley et al., 2000, 2003; Fewtrell and McCauley, 2012; Miller and Cripps, 2013).
- There is some evidence that changes in distribution may persist for longer than the initial change in behaviour, i.e. position in the water column, schooling behaviours and swim speeds may return to normal relatively quickly (within minutes or hours), but their distribution may not return to normal for hours or days. Potential changes in distribution of fish have been observed in some studies for approximately five days following sound exposure, although such changes are limited to studies that focused primarily on migrating sound pressure-sensitive types of fish with a swim bladder-ear connection (e.g. Clupeidae, Gadidae). These studies also acknowledge that it is difficult to attribute these changes in distribution directly to the seismic survey or to natural migration patterns, food availability or other natural factors (Slotte et al., 2004; Engås et al., 1996; Engås and Løkkeborg, 2002). However, it is possible that changes to the behaviour and distribution of some sound-sensitive prey species (e.g. herring, sardines) may have some indirect influence on the distribution of larger predatory fishes during the days following exposure and disturbance.
- Changes in behaviour or disruption to diurnal activities may indicate that activities such as feeding and energy expenditure can be affected if exposed long term (Hubert et al., 2020; Van der Knaap, 2020, 2021).

Given the limited convergence in results from the available studies, the subjective nature of many assessments and the context under which fish received sound, the Popper et al. (2014) ANSI-Accredited Standards Committee Sound Exposure Guidelines for Fishes and Turtles determined that it is not possible to define exact sound level thresholds for changes in fish behaviours. Instead, Popper et al. (2014) applies relative risk criteria (**Table 6-3**). The criteria reflect the potential for substantial changes in behaviour for a large proportion of the animals exposed to a sound, which may alter distribution, and movement from preferred sites for feeding and reproduction. The criteria do not include effects on single animals or small changes in behaviour such as a startle response or minor movements. As such, Popper et al. (2014) indicate that fish without a swim bladder or with no connection between the swim bladder and the inner ear may experience substantial changes in behaviour within tens or hundreds of metres of a seismic source. These peer-reviewed and accredited sound exposure criteria are reflected in Woodside's risk assessment. It is acknowledged that some fishes with swim bladders may show varying levels of awareness of sound pressure at greater distances from the seismic source, but it is important to recognise changes in behaviour that may be of ecological significance from those that are not.

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The Operational Area lies entirely within the Exmouth Plateau KEF. While parts of this KEF are characterised by topographic features including terraces, canyons and pinnacles, in the deep water depths of the Operational Area (~800-1,200 m) sediments are mostly soft and there is a lack of hard substrate, therefore, is expected that abundance and diversity of marine life will be low. However, a range of bony fishes (teleosts) and elasmobranchs (sharks and rays), including benthic, demersal, and pelagic fishes may still be present.

Benthic and demersal fish species recorded on or around the Exmouth Plateau in similar water depths as the Operational Area include grenadiers, slickheads, cusk eels, basketwork eels, and halosaurs, smelts, anglerfish, dogfish sharks and sixgill stingrays (Williams et al., 1996). Pelagic species include small bathy-pelagic and meso-pelagic species, such as lanternfishes (Williams et al., 1996), plus larger pelagic species such as tunas and billfish. Juvenile southern bluefin tuna may occur during their migration south from spawning grounds near Indonesia to more temperate southern waters. Southern bluefin tuna is listed as a conservation dependent species under the EPBC Act (DAWE, 2021). Due to the water depths of the Operational Area being greater than 800 m, it does not support any of commercial indicator species such as the snapper, emperor, cod or mackerel species targeted by Commonwealth or WA fisheries on the continental shelf or upper continental slope. For example, the core water depth range for ruby snapper (*Etelis carbunculus*, *Etelis* spp.), an indicator species for the Commonwealth managed Western Deepwater Trawl Fishery and the WA managed Pilbara Line Fishery, is 150–480 m (DPIRD, 2019).

In addition to the elasmobranch species reported in Williams et al. (1996), the EPBC Protected Matters Search (**Appendix C**) identified four shark species and one ray species that may potentially occur within the Operational Area.

Table 6-4 presents the results of the acoustic modelling study for maximum predicted distances to mortality/PMI, recoverable injury and TTS onset in fish. Data is presented for both the entire water column (MOD) and at the seafloor.

Table 6-4: Summary of maximum distances to mortality/PMI, recoverable injury and TTS onset in fish for single pulse and SEL_{24h} modelled scenarios

Relevant hearing group	Potential impact	Sound exposure threshold	Water column (MOD)
			R _{max} (km)
I Fish: No swim bladder	Mortality/PMI	219 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	0.05
		213 dB re 1 μPa (PK)	0.06
	Recoverable injury	216 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	0.05
		213 dB re 1 μPa (PK)	0.06
TTS	186 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	4.5	
II Fish: Swim bladder not involved in hearing	Mortality/PMI	210 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	0.05
		207 dB re 1 μPa (PK)	0.11
	Recoverable injury	203 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	0.05
		207 dB re 1 μPa (PK)	0.11
TTS	186 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	4.5	
III Fish: Swim bladder involved in hearing	Mortality/PMI	207 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	0.05
		207 dB re 1 μPa (PK)	0.11
	Recoverable injury	203 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	0.05
		207 dB re 1 μPa (PK)	0.11
TTS	186 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL _{24h})	4.5	

The following fish types, associated with the Exmouth Plateau KEF, have been identified for this assessment:

- Deep water demersal fish species.
- Pelagic fish species.
- Shark species.

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Demersal fish species

As shown in **Table 6-4**, for all fish with a swim bladder both involved and not involved in hearing (Group II and III fish, which would represent most demersal fish) mortality/PMI and recoverable injury thresholds within the entire water column were reached within 110 m based on the application of the PK threshold. These ranges are reported in Koessler et al., (2021) as maximum-over-depth distances and the ranges at the seafloor may be less. Therefore, injury effects could occur to demersal fish in close proximity to the seismic source within or adjacent to the Active Source Area. However, as discussed above, the thresholds for mortality and injury are considered highly conservative. While injury or mortality to fish in the immediate proximity of the seismic source is theoretically possible, free-swimming fish such as the demersal species are expected to be able to avoid the seismic source as it approaches their position or ramps up during soft starts.

Based on the maximum predicted R_{max} distance to TTS of 4.5 km within the entire water column (SEL_{24h} threshold – refer to **Table 6-4**), individuals in demersal fish communities within the Active Source Area could experience TTS effects. The radii that corresponds to SEL_{24h} typically represent an unlikely worst-case scenario for SEL-based exposure since, more realistically, fish would not stay in the same location or at the same range for a period of 24-hours. Therefore, this method is highly conservative and a reported radius of SEL_{24h} criteria does not necessarily mean that animals travelling within this radius of the source will suffer hearing impairment. It is possible that some demersal fishes may not avoid the approaching seismic source completely and some level of TTS is possible, but the effects are temporary and recoverable, and the potential for such effects to have significant implications on fish fitness and survival is low.

The majority of studies relevant to behavioural responses in demersal fish species (e.g. Pearson et al., 1992; Santulli et al., 1999; McCauley et al., 2000a, 2003; McCauley and Salgado Kent, 2007; Woodside, 2011; Fewtrell and McCauley, 2012; Miller and Cripps, 2013; Bruce et al., 2018; Meekan et al., 2021), indicate that exposure to a mobile seismic source and significant changes in behaviour are likely to be limited to durations of minutes or hours and occur within hundreds of metres of the seismic source as it passes.

Popper et al. (2014) suggest that the potential for significant behavioural impacts in the Group II category of fishes is high in the near-field (tens of metres), moderate at intermediate distances (hundreds of metres) and low in the far field (thousands of metres). Therefore, the awareness of fishes to the seismic sound and any resultant behavioural responses may be limited to a few hours as the seismic source approaches from several kilometres away and passes, while significant startle or avoidance responses are more likely to be limited to a shorter period (less than an hour) when the seismic source passes close by. Consistent with the studies reviewed earlier in this section, behaviours may return to normal within less than an hour (sometimes just minutes) of the survey vessel passing.

Further, the implications for demersal fishes at a population level are expected to be limited. McCauley (1994) suggests that behavioural changes in fishes may only be localised and temporary, without significant repercussions at a population level. Hawkins and Popper (2017) highlight that some responses to man-made sound may have minimal or no consequences for fish populations. For example, short-term startle responses to sounds that rapidly diminish with repeated presentation, or that do not change the overall behaviour of fishes are unlikely to affect key life functions. In addition, anthropogenic sound events that are transient in nature, such as a seismic survey, and result in short-term impacts do not necessarily translate into long-term consequences to populations (Hawkins and Popper, 2017). Meekan et al. (2021) noted that if behavioural changes to demersal fish species did take place, they had no measurable short- (days) to long-term (weeks) impacts on behaviour or abundance.

Demersal fish communities within the Operational Area may exhibit some temporary behavioural responses to noise emissions from the seismic source; however, this is not likely to have any impact at the ecosystem level.

Pelagic fish species

Pelagic fish species likely to be present in the Operational Area include tuna, billfish and small pelagic species such as lanternfishes. Many species of tuna and billfish do not possess a swim bladder.

As shown in **Table 6-4**, the maximum predicted R_{max} distances to mortality/PMI and recoverable injury for fish with no swim bladder (Group I fish) within the entire water column was within 60 m (PK threshold). For all fish with a swim bladder (Group II and III fish) the maximum predicted R_{max} distance to mortality/PMI within the entire water column was within 110 m. The maximum distance to the TTS threshold in the water column for all fish hearing groups (Group I, II, III) was within 4.5 km.

All pelagic fish species, particularly large, fast-swimming fish species such as tuna and billfish are highly unlikely to experience TTS effects as they are not restricted by seabed habitat and can swim away from a seismic source. Individuals would have to remain within ranges of approximately 4.5 km of the operating seismic source for several hours to be exposed to sound levels that could cause TTS. Pelagic fishes are most likely to exhibit behavioural responses (avoidance) by moving away from an operating seismic source that approaches within a few tens of metres of them. Behaviour may return to normal within minutes. However, it is acknowledged that the behaviours and distributions of the pelagic species could be affected for hours or days following exposure as a result of potential disturbance to more sound-sensitive prey species, such as herrings, sardine's, sprat and shads.

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Sharks

Five shark species (great white shark, oceanic whitetip shark, shortfin mako shark, scalloped hammerhead and longfin mako shark) were identified in the EPBC PMST search as potentially occurring within the Operational Area. No sound exposure thresholds currently exist for acoustic impacts from seismic sources that are specific to sharks, which are sensitive only to particle motion. As a conservative and precautionary approach, the Popper et al. (2014) exposure guidelines for fish with no swim bladder for injury; 213 dB re 1 μPa (PK) and 219 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL_{24h}); and TTS (186 dB re 1 $\mu\text{Pa}^2\cdot\text{s}$ (SEL_{24h})), have been used for this assessment.

As shown in **Table 6-4**, the maximum predicted R_{max} distances to mortality/PMI/recoverable injury for fish with no swim bladder (incl. sharks) within the entire water column was within 60 m (PK threshold). TTS thresholds across the water column for fish without a swim bladder could be reached within 4.5 km. It is important to appreciate that individual sharks would have to remain within a range of 4.5 km of the operating seismic source (which is also moving) for several hours to be exposed to sound levels that could cause TTS.

It is expected that the potential effects to sharks associated with acoustic noise will be the same as for other pelagic fish species, resulting in minor and temporary behavioural change such as avoidance. This aligns with the Popper et al. (2014) guidelines, which detail that there is the potential for high risk of behavioural impacts in fish species near the seismic source (tens of metres), moderate risk within hundreds of metres, and low risk at thousands of metres from the seismic source.

Fish, Sharks and Rays – Impact Assessment Conclusion

The potential impacts of noise emissions from the seismic source on fish, sharks and rays during the acquisition of the survey are considered to be localised and of no lasting effect, and restricted to temporary behavioural changes (avoidance) in any isolated individuals that may transit the area in close proximity to the operating seismic source. Based on the duration (up to 80-days) of seismic acquisition, and the proposed control measures, predicted noise levels from seismic acquisition are not considered likely to cause mortality/PMI, recoverable injury or significant TTS effects to fish communities or result in any ecologically significant impacts at a population level.

Cetaceans

Species Sensitivity and Sound Exposure Thresholds

Marine mammals and especially cetaceans rely on sound for important life functions including individual recognition, socialising, detecting predators and prey, navigation and reproduction (Weilgart, 2007; Erbe et al., 2015; Erbe et al., 2018). Underwater noise can affect marine mammals in various ways including interfering with communication (masking), behavioural changes, a shift in the hearing threshold, physical damage and stress (Erbe, 2012; Rolland et al., 2012).

When exposed to intense or moderately intense noise levels (e.g. seismic airguns), marine mammals can experience physiological impacts such as physical damage to the auditory apparatus, for example loss of hair cells or permanently fatigued hair cell receptors, which could cause permanent or temporary loss of hearing sensitivity. While the loss of hearing sensitivity is usually strongest in the frequency range of the emitted noise, it is not limited to the frequency bands where the noise occurs but can affect a broader hearing range. This is because animals perceive sound structured by a set of auditory bandwidth filters that proportionately increase in width with frequency.

Exposure to sufficiently intense sound may lead to an increased hearing threshold in any living animal capable of perceiving acoustic stimuli. If this shift is reversed and the hearing threshold returns to normal, the effect is called a temporary threshold shift (TTS). The onset of TTS is often defined as threshold shift of 6 dB above the normal hearing threshold (Southall et al., 2007). If the threshold shift does not return to normal, the residual shift is called a permanent threshold shift (PTS). PTS is hearing loss from which marine fauna do not recover (permanent hair cell or receptor damage).

Threshold shifts can be caused by acoustic trauma from a very intense sound of short duration, as well as from exposure to lower level sounds over longer time periods (Houser et al., 2017). Injury to the hearing apparatus of a marine animal may result from a fatiguing stimulus measured in terms of sound exposure level (SEL), which considers the sound level and duration of the exposure signal. Intense sounds may also damage the hearing apparatus independent of duration, so an additional metric of peak pressure level (PK) is needed to assess acoustic exposure injury risk.

In marine mammals, the onset level and growth of TTS is frequency specific, and depends on the temporal pattern, duty cycle and the hearing test frequency of the fatiguing stimuli. Sounds generated by seismic airguns have been proven to cause noise-induced threshold shifts in marine mammals at high received levels. However, there is considerable individual difference in all TTS-related parameters between subjects and species tested so far. Furthermore, TTS requires relatively high noise levels and thus occurs at shorter distances compared with behavioural effects, which are likely to occur at much lower levels (Dunlop et al., 2017).

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There are no published data on the sound levels that cause PTS in marine mammals. Hence, PTS effects in marine mammals should be viewed as theoretical, as they have never actually been demonstrated in either captive or wild animals.

In response to noise from seismic airguns marine mammals were observed to exhibit localised spatial avoidance and temporary displacement, however different species of cetaceans may adopt different strategies for responding to acoustic disturbance (Stone and Tasker, 2006).

The sound exposure thresholds applied for cetaceans in the acoustic modelling study, and in this impact assessment, are summarised in **Table 6-5**. Noise thresholds have been defined for both the per-pulse sound energy released (PK), as well as the total sound energy (accumulated) (SEL) that marine fauna is subjected to over a defined period of time. For recent regulatory assessments of seismic surveys the period of total sound energy integration (i.e. accumulation) has been typically defined as 24-hours; hence, this was the period used for modelling and in this assessment (SEL_{24h}). The PK and frequency-weighted accumulated SEL presented in **Table 6-5** are from the U.S. National Oceanic and Atmospheric Administration (NOAA) Technical Guidance (NMFS, 2018) for the onset of PTS and TTS in marine mammals and are consistent with a detailed review published by Southall et al. (2019). The marine mammal behavioural threshold presented in **Table 6-5** is based on the current NOAA (2019) criterion for marine mammals of 160 dB re 1 µPa sound pressure level (SPL) for impulsive sound sources.

Table 6-5: Acoustic effects thresholds applicable to cetaceans

Hearing group	NOAA (2019)	NMFS (2018), Southall et al. (2019)			
	Behaviour	PTS onset thresholds* (received level)		TTS onset thresholds* (received level)	
	Unweighted SPL (L_{pk} ; dB re 1 µPa)	Weighted SEL _{24h} (L_E ; 24h; dB re 1 µPa ² ·s)	PK (L_{pk} ; dB re 1 µPa)	Weighted SEL _{24h} (L_E ; 24h; dB re 1 µPa ² ·s)	PK (L_{pk} ; dB re 1 µPa)
Low-frequency (LF) cetaceans	160	183	219	168	213
High-frequency (HF) cetaceans		185	230	170	224

* Dual metric acoustic thresholds for impulsive sounds: Use whichever results in the largest isopleth for calculating PTS and TTS onset. If a non-impulsive sound has the potential of exceeding the peak sound pressure level thresholds associated with impulsive sounds, these thresholds should also be considered. L_p —denotes sound pressure level period and has a reference value of 1 µPa. L_{pk} , flat-peak sound pressure is flat weighted or unweighted and has a reference value of 1 µPa. L_E - denotes cumulative sound exposure over a 24-hour period and has a reference value of 1 µPa²·s.

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The type and scale of the effect of seismic sound on cetaceans will depend on a number of factors including; the level of exposure, physical environment, location of the animal in relation to the sound source, how long the animal is exposed to the sound, the exposure history, how often the sound is repeated (repetition period) and the ambient sound level. The context of the exposure plays a critical and complex role in the way an animal might respond (Gomez et al., 2016; NMFS, 2016). Without appropriate control measures in place, noise emissions from the seismic source have the potential to impact cetaceans by causing injury or changes to hearing (PTS and TTS) as a result of high sound levels at close range to the seismic source, or behavioural disturbance impacts (refer to the sound exposure thresholds for PTS, TTS and behavioural disturbance described above).

Based on the information presented in **Section 4.6.3**, there are no BIAs for cetaceans identified within the Operational Area; however, a pygmy blue whale migration and foraging BIAs are located 14 km south-east and 154 km south of the Operational Area, respectively. The Operational Area overlaps the pygmy blue whale distribution range and includes the recorded presence of an individual (Thums et al. 2022). The pygmy blue whale may be encountered within the Operational Area during their northbound migration from April to July, and southbound migration from October to January; however the likelihood of encountering migrating or foraging pygmy blue whales is considered low.

As described in **Section 4.6.3.1**, there is the possibility that some migrating northbound pygmy blue whales may also be opportunistically foraging to the west of the migration BIA (during the peak period of northbound migration), as indicated by the track of one northbound individual animal tagged off North West Cape in early June 2020 (in **Figure 4-7**). This represents <5% of total number of tagged whales (refer to Thums et al. (2022)). As shown in **Figure 4-7**, the track of this one individual partially overlapped the eastern edge of the Operational Area and the south-east corner of the Active Source Area, with recorded presence as shown by the satellite track in June 2020 (peak northbound

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migration). Acoustic and telemetry data indicate faster migration speeds for the southbound migration compared to the northbound migration and no evidence of foraging by southbound pygmy blue whales within the Operational Area.

A humpback whale migration BIA is located 138 km south-east of the Operational Area. An additional seven cetacean species listed under the EPBC Act (three threatened and migratory, and four migratory), including baleen and toothed whales were identified as potentially occurring within the Operational Area. Similarly, other migratory cetacean species including the humpback, fin, sei and killer whale, may occur within or adjacent to the Operational Area during the acquisition of the survey, however, the presence of these species is likely to be limited to infrequent occurrences of individuals or small groups.

Considering the NMFS (2018) SEL_{24h} threshold criterion, LF cetaceans could reach PTS thresholds within 380 m from the nearest survey line based on the application of the multiple pulse SEL_{24h} threshold, but within 30 m based on the single pulse PK metric (**Table 6-6**). TTS thresholds could be reached within 60.7 km based on the application of the multiple pulse SEL_{24h} threshold, and within 60 m based on the single pulse PK metric (**Table 6-6**). For HF cetaceans, PTS and TTS thresholds were not reached within the limits of the modelling resolution or 20 m (i.e. either the threshold will not be exceeded, or the range to exceedance will be limited to the immediate proximity of the seismic source).

Table 6-6: Maximum predicted horizontal distances (R_{max}) to PTS, TTS and behavioural response thresholds in cetaceans

Hearing Group	Sound Exposure Threshold	R _{max} distance (km)*
PTS		
LF cetaceans	219 dB re 1 µPa (PK)	0.03
	183 dB re 1 µPa ² .s (SEL _{24h})	0.38
HF cetaceans	230 dB re 1 µPa (PK)	-
	185 dB re 1 µPa ² .s (SEL _{24h})	-
TTS		
LF cetaceans	213 dB re 1 µPa (PK)	0.06
	168 dB re 1 µPa ² .s (SEL _{24h})	60.7
HF cetaceans	224 dB re 1 µPa (PK)	-
	170 dB re 1 µPa ² .s (SEL _{24h})	-
Behavioural Response		
LF cetaceans	160 dB re 1 µPa (SPL)	7.28
HF cetaceans		

N.B. A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

The 24-hour SEL is a cumulative metric that reflects the dosimetric (measured dose) impact of noise levels within 24-hours, based on the conservative assumption that an animal is consistently exposed to such noise levels at a fixed position. This represents a conservative worst-case scenario. More realistically, whales would not stay in the same location and may not remain within range of the survey line for 24-hours. This would particularly be the case for an animal migrating through offshore waters that do not represent a migratory or foraging BIA. Therefore, a reported radius for SEL_{24h} criterion does not mean that a whale travelling within this radius of the source will experience PTS or TTS, but rather that an animal could be exposed to the sound levels associated with these effects if it remained in that range for 24-hours (Koessler et al., 2021).

It is highly unlikely that an individual whale (e.g. pygmy blue whale) would remain within a range of 380 m (predicted distance for PTS for LF cetaceans, based on the SEL_{24h} metric) from the operating seismic source (which is moving) for a full 24-hour period, or even for a few hours. Should an individual remain within the range for potential impact, some recoverable TTS could occur. However, the likelihood of TTS occurring is reduced to some degree by the implementation of control measures including a shut-down zone of 500 m and a low-power zone of 2 km under Part A of the EPBC Policy Statement 2.1, which reduces the potential for close range sound exposures where the greatest sound contribution is received.

For both LF and HF cetaceans, a behavioural response could occur within 7.28 km of the seismic source.

Based on the noise modelling results in Koessler et al. (2021), received sound levels at the pygmy blue whale foraging BIA and the humpback whale migration BIA are predicted to be below 130 dB re 1 µPa SPL. No significant

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behavioural responses are expected and the BIAs are well beyond the maximum range in which TTS effects could occur.

The Blue Whale Conservation Management Plan (BWCMP) (Action Area 2) states that anthropogenic noise in BIAs should be managed such that any blue whale continues to utilise the area without injury (DoE, 2015a). Although TTS in cetaceans has previously been regarded as hearing impairment, not injury, advice from NOPSEMA and DAVE is that TTS should be considered a form of injury to pygmy blue whales and this should be prevented within the BIAs. Therefore, the potential for TTS effects (and therefore injury) to pygmy blue whales and management of this risk warrants further evaluation to ensure no inconsistency with the (BWCMP)..

Pygmy blue whales migrate as solitary animals or in small groups along the continental slope, typically at depths between 500 m and 1000 m on the way to the Banda and Molucca seas near Indonesia, where calving is understood to occur (Double et al., 2014). The northern migration typically passes north-western Australia between approximately April to July with the return southern migration between October and January.

The modelled range to TTS effects in LF cetaceans, such as the pygmy blue whale, of 60.7 km may be overly conservative for the following reasons:

- The 60.7 km range to TTS is based on the modelled maximum-over-depth range and may correspond with water depths that are greater than the depths at which pygmy blue whales typically swim and dive to.
- As explained above, the SEL_{24h} criterion is a cumulative metric that reflects the dosimetric impact of sound energy accumulated over a 24-hour period and assumes that an animal is consistently exposed to such noise levels at a fixed location. The radii that correspond to SEL_{24h} typically represent an unlikely worst-case scenario for SEL-based exposure since, more realistically, marine fauna would not stay in the same location or at the same range for 24 hours (Koessler et al., 2021). It is noted that the accumulation of sound energy is not linear and rapid growth in accumulated exposures may occur over a matter of hours as the seismic source approaches an animal's location, but the criterion and modelling are still limited by the assumption that animals remain in a fixed location for this period.

To account for the movement of pygmy blue whales within the water column, Woodside commissioned JASCO to undertake animal movement (animat) modelling. The JASCO Animal Simulation Model Including Noise Exposure (JASMINE) was used to predict the exposure of animats (pygmy blue whales) to sound arising from the seismic activity. Given that the Scarborough 4D B1 MSS is adjacent to the migration BIA for pygmy blue whales, migratory behaviour was the only behavioural profile considered. The behavioural profile applied for pygmy blue whales was derived from a range of sources that used multi-sensor tags to record fine-scale dive and movement behaviour (Owen et al. 2016, Möller et al. 2020). Where information was unavailable for pygmy blue whales, parameters were derived from blue whale (*B. musculus*) tagging data (Goldbogen et al. 2011). Owen et al. (2016) monitored the fine-scale movement and diving behaviours of a migrating sub-adult pygmy blue whale off the west coast of WA. To reduce energy expenditure during migration, the whale dives to a depth that is likely to allow it to avoid surface wave drag and maximize horizontal movement. The mean depth of migratory dives (82% of all dives) was 14 m ± 4 m, and the whale spent 94% of observed time and completed 99% of observed migratory dives at water depths of less than 24 m. The mean maximum depth of exploratory dives was 107 ± 81 m (range 23–320 m) and did not appear to be related to seafloor depth. The behaviour of migrating pygmy blue whales was modelled to represent the animals migrating along the west coast of Australia, to and from Indonesia (Double et al., 2014; DoE, 2015a). The speed for travel for migratory behaviour (1.17 ± 0.60 m/s) and exploratory dives (0.88 ± 0.14 m/s) were calculated from data presented in Möller et al. (2020).

The estimated sound fields produced by source and propagation models for the seismic survey were incorporated into a sound exposure model to estimate the radial distance within which 95% of the exposure exceedances occur (ER_{95%}). The maximum distance within which exposure exceedances occur (ER_{max}) was also included given the sensitivity of pygmy blue whales and the limited knowledge about their behaviour within the migratory BIA. Noise effect metrics included peak pressure level (PK), sound exposure levels (SEL_{24h}), and sound pressure level (SPL).

The animat modelling indicated that no whales within the pygmy blue whale migration BIA were exposed to sound levels exceeding the threshold criteria for PTS, TTS and a behavioural response within the 95th percentile exposure ranges (ER_{95%}) and maximum exposure ranges (ER_{max}) (Koessler et al., 2021; **Appendix G**). However, to provide context a second simulation was run that did not limit the distribution of whales to the migration BIA. A summary of these results are presented in **Table 6-7** below.

Table 6-7: Summary of animat simulation results for migrating pygmy blue whales. The 95th percentile exposure ranges (ER_{95%}) and maximum exposure ranges (ER_{max}) in kilometres and probability of animats being exposed above thresholds with the ER_{95%} and ER_{max} ranges

Threshold			Maximum acoustic radial distance to threshold (km)	ER _{95%}		ER _{max}	
Description	Threshold level (dB)	Distance (km)		Probability of exposure (%)	Distance (km)	Probability of exposure (%)	
TTS	PK	213 ¹	0.06	0.05	88	0.06	84
	SEL _{24h}	168 ²	60.7	15.02	42	21.73	32
PTS	PK	219 ¹	0.03	0.04	73	0.04	71
	SEL _{24h}	183 ³	0.38	0.06	80	0.13	65
Behavioural response		160 ³	7.28	6.54	71	7.33	67

¹ PK (Lpk; dB re 1 µPa)

² LF-weighted SEL_{24h} (L_E,24h; dB re 1 µPa² · s)

³ SPL (Lp; dB re 1 µPa)

As shown in **Table 6-7**, maximum exposure ranges (ER_{max}) to SEL_{24h} thresholds were 130 m and 21.73 km for PTS and TTS respectively. For PK thresholds, ER_{max} distances were 40 m to PTS and 60 m to TTS.

The 95th percentile exposure ranges (ER_{95%}) to SEL thresholds for PTS were 60 m, and for TTS were 15.02 km. For PK thresholds, ER_{95%} distances were 40 m to PTS and 50 m to TTS.

Based on these results, the conservative range for potential TTS effects in pygmy blue whales is approximately 22 km from the seismic source, compared with the 60.7 km range previously predicted in Koessler et al. (2021) when animal movement was not factored into the model. The closest point of approach from the Active Source Area and the pygmy blue whale migration BIA is ~25 km and therefore, pygmy blue whales will continue to utilise the migration BIA without injury or significant behavioural disturbance, which is not inconsistent with the BWCMP (**Section 6.8.3**) There is no impact to the foraging BIA.

The potential for masking impacts to migrating pygmy blue whales within the migration BIA is limited, as the intermittent nature and relatively short duration of the seismic pulses is unlikely to result in any significant masking of whale calls. During seismic operations the longest line acquired within the Active Source Area is 105 km, which would take approximately 12.5 hours to acquire, however on average lines will take ~9 hours to acquire data. The source array is then shut-down and recovered during line turns, which would take approximately 3–4 hours, before the source is deployed and activated again for seismic acquisition on the next line in the 'race track' pattern. Hence, there would be at least one silent period of several hours within each 24-hour period and migrating whales would be exposed to the seismic pulses for less than a day. A tagging study of blue whales showed that migrating individuals can travel 50 to 100 km per day (Double et al., 2014). This equates to an average swimming speed of 2–4 km/hr over a 24-hour period. In comparison, the seismic vessel will be travelling at around 4.5 knots (8 km/hr) therefore individual pygmy blue whales are expected to pass through the ensonified area in less than 24 hours. Consequently, masking impacts from sound exposure are unlikely to cause any long-term masking (<24 hours) for migrating individuals.

In relation to the southbound migration there is the potential for acoustic emissions from the seismic source to mask calls between migrating pygmy blue whale mothers and calves. Potential impacts are limited by a number of factors, including the source is ~25km from the migratory BIA, background ambient noise levels and the fact that mother-calf pairs will be communicating with each other over very short distances (tens to hundreds of metres). It is likely that pygmy blue whales will respond to noise interference according to the context and the signal produced and masking between mother and calves is not expected.

To account for the potential presence of blue pygmy whales within the distribution range (and possibly west of the migratory BIA) in the peak northbound migratory season, additional adaptive management procedures will be implemented to manage potential impacts to pygmy blue whales (refer to **Control 4.5** in ALARP table below) and to ensure the activity is not inconsistent with the BWCMP (Action Area 2 and 3 see Section 6.8.3).

Cetaceans - Impact Assessment Conclusion

Based on the assessment above, the implementation of controls and the absence of any TTS effects within the pygmy blue whale migration BIA, and no impact to the foraging BIA, the implementation EPBC Statement Policy 2.1 management procedures during the survey and an additional control during the peak northbound migration when there has been recorded presence, the potential impacts of noise emissions from the seismic source on cetaceans during the acquisition of the survey are considered to be slight and short-term. Impacts to cetaceans are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause injury effects. This is not inconsistent with the BWCMP (**Section 6.8.3**)

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Marine Reptiles

Species Sensitivity and Sound Exposure Thresholds

Acute noise, or temporary exposure to loud noise, may result in the avoidance of important habitats and in some situations physical damage to turtles. However, there is a scarcity of data regarding the responses of turtles to acoustic exposure, and no studies of hearing loss due to exposure to loud sounds. Marine turtles have the best hearing sensitivity and low frequencies in the range of 100-700 Hz (Bartol and Musick, 2003; Finnernan et al., 2017), and are known to have poor auditory sensitivity (Bartol and Ketten, 2006; Dow Piniak et al., 2012). Accordingly, PTS and TTS thresholds for turtles are likely more similar to those of fishes than to marine mammals (Popper et al., 2014). McCauley et al. (2000b) observed the behavioural response of caged sea turtles—green (*Chelonia mydas*) and loggerhead (*Caretta caretta*)—to an approaching seismic airgun. For received levels above 166 dB re 1 μPa (SPL), the turtles increased their swimming activity and above 175 dB re 1 μPa (SPL) they began to behave erratically, which was interpreted as an agitated state.

The 166 dB re 1 μPa level has been used as the threshold level for a behavioural response to sea turtles by NMFS and applied in the Arctic Programmatic Environmental Impact Statement (PEIS) (NSF, 2011) and the Recovery Plan for Marine Turtles in Australia (DoEE, 2017a). The 175 dB re 1 μPa level from McCauley et al. (2000b) is recommended as the threshold for behavioural disturbance.

Some additional data suggest that behavioural responses occur closer to an SPL of 175 dB re 1 μPa , and TTS or PTS at even higher levels (Moein et al., 1995), but the received levels were unknown and the NSF (2011) PEIS maintained the earlier NMFS criteria levels of 166 and 180 dB re 1 μPa (SPL) for behavioural response and injury, respectively. Popper et al. (2014) suggested injury to turtles could occur for sound exposures above 207 dB re 1 μPa (PK) or above 210 dB re 1 $\mu\text{Pa}^2\text{-s}$ ($\text{SEL}_{24\text{h}}$). Sound levels defined by Popper et al. (2014) show that animals are very likely to exhibit a behavioural response when they are near an airgun (tens of metres), a moderate response if they encounter the source at intermediate ranges (hundreds of metres), and a low response if they are far (thousands of metres) from the airgun.

The sound exposure thresholds applied for marine turtles in the acoustic modelling study, and in this impact assessment, are summarised in **Table 6-8**. The peak pressure levels (PK) and frequency-weighted accumulated sound exposure levels (SEL) presented in **Table 6-8** are as reported in Finnernan et al. (2017) for PTS and TTS effects in turtles. The behavioural response threshold presented in **Table 6-8** is based on the NMFS and applied in the Arctic Programmatic Environmental Impact Statement (PEIS) (NSF, 2011), and the behavioural disturbance threshold is based on the level reported in McCauley et al. (2000b).

Table 6-8: SPL, $\text{SEL}_{24\text{h}}$, and PK thresholds for acoustic effects on marine turtles

Effect Type	Criterion	Unweighted SPL (L_{pk} ; dB re 1 μPa)	Weighted $\text{SEL}_{24\text{h}}$ ($L_{\text{E},24\text{h}}$; dB re 1 $\mu\text{Pa}^2\text{-s}$)	PK (L_{pk} ; dB re 1 μPa)
Behavioural response	NSF (2011)	166	N/A	
Behavioural disturbance	McCauley et al. (2000a, 2000b)	175		
PTS onset thresholds* (received level)	Finneran et al. (2017)	N/A	204	232
TTS onset thresholds* (received level)			189	226

* Dual metric acoustic thresholds for impulsive sounds: Use whichever results in the largest isopleth for calculating PTS and TTS onset. If a non-impulsive sound has the potential of exceeding the peak sound pressure level thresholds associated with impulsive sounds, these thresholds should also be considered. L_{p} denotes sound pressure level period and has a reference value of 1 μPa . L_{pk} flat denotes peak sound pressure is flat weighted or unweighted and has a reference value of 1 μPa . L_{E} denotes cumulative sound exposure over a 24-hour period and has a reference value of 1 $\mu\text{Pa}^2\text{s}$.

Impact Assessment

As presented in **Section 4.6.2**, there are no BIAs or Habitat Critical to the survival of marine turtles within the Operational Area. The nearest BIAs and Habitat Critical are for flatback turtles, located approximately 135 km south-east and 147 km south-east of the Operational Area, respectively. The Recovery Plan for Marine Turtles (DoEE, 2017a) specifies a 60 km internesting buffer for flatback turtles, and 20 km internesting buffer for green, hawksbill and loggerhead turtles. The 60 km internesting buffer for flatback turtles (DoEE, 2017a) is based primarily on longshore

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movements in nearshore coastal waters or travel between island rookeries and the adjacent mainland (Whittock et al., 2014).

Whittock et al. (2016) defined suitable interesting habitat as water 0–16 m deep and within 5–10 km of the coastline, while unsuitable interesting flatback habitat was defined as waters >25 m deep and >27 km from the coastline. There is no evidence to date to indicate that flatback turtles swim out into deep offshore waters during the interesting period (Whittock et al., 2016).

It is important to note that flatback turtle hatchlings do not undertake oceanic migrations offshore to deep, pelagic waters. Instead, juveniles grow to maturity in shallow coastal waters close to their natal beaches (Musick and Limpus, 1996).

Additionally, one other marine turtle species was also identified as potentially occurring within the Operational Area. However, there are no BIAs nearby, and therefore their occurrence within or adjacent to the Operational Area is considered unlikely, as are any impacts to these species as a result of underwater sound from the seismic source.

Table 6-9 presents the results of the acoustic modelling study for the maximum R_{max} distances to PTS (injury), TTS, behavioural response and behavioural disturbance thresholds in turtles, for all modelled source scenarios. The results for the thresholds applied for PTS and TTS consider both metrics (single pulse PK and multiple pulse SEL_{24h}).

Table 6-9: Maximum predicted horizontal distances (R_{max}) to PTS, TTS, behavioural response and behavioural disturbance thresholds in turtles, for all modelled scenarios

Hearing group	Sound effect threshold	R_{max} distance (km)
Marine turtles	Behavioural response	
	166 dB re 1 μ Pa (SPL)	3.87
	175 dB re 1 μ Pa (SPL)	0.76
	PTS	
	232 dB re 1 μ Pa (PK)	-
	204 dB re 1 μ Pa ² .s (SEL _{24h})	0.05
	TTS	
	226 dB re 1 μ Pa (PK)	-
	189 dB re 1 μ Pa ² .s (SEL _{24h})	0.28

N.B. A dash indicates that the threshold is not reached within the limits of the modelling resolution (20 m).

As shown in **Table 6-9**, based on the application of the multiple pulse SEL_{24h} thresholds, marine turtles could experience PTS within 50 m of the active source, and experience TTS within 280 m of the active source. Single pulse PK PTS thresholds were not reached within the limits of the modelling resolution for PTS or TTS.

The SEL_{24h} is a cumulative metric that reflects the doisimetric impact of noise levels within 24-hours based on the assumption that an animal is consistently exposed to such noise levels at a fixed position, and represents an unlikely scenario. More realistically, marine turtles would not stay in the same location for 24-hours, but rather a shorter period, depending upon their behaviour and the proximity and movements of the source. Therefore, a reported radius for SEL_{24h} criteria does not mean that marine reptiles travelling within this radius of the source will be impaired, but rather that an animal could be exposed to the sound level associated with impairment (either PTS or TTS) if it remained in that location for 24-hours (Koessler et al., 2021; **Appendix G**).

No PTS or TTS effects to marine turtles are expected given the small distances to SEL_{24h} thresholds, 50 m and 280 m respectively, and the low likelihood of marine turtles being present within the offshore waters of the Operational Area.

Based on the 166 dB re 1 μ Pa SPL behavioural threshold criterion a behavioural response could occur within 3.87 km, and based on the 175 dB re 1 μ Pa SPL behavioural threshold criterion a behavioural disturbance could occur within 760 m.

Given that there are no marine turtle BIAs or Habitat Critical within the Operational Area, and the nearest are located 135 km south-east of the Operational Area, marine turtles are unlikely to occur within the area of potential impact. Should any marine turtles occur within 3.87 km of the seismic source, they may experience some behavioural disturbance, however it is expected that turtles within this area will not be evenly distributed and are likely to be moving in and out of the area, and similarly, the sound levels within this potential impact area with change as the seismic vessel moves throughout the survey for a period of up to 80-days.

Marine Reptiles - Impact Assessment Conclusion

Based on the assessment above, the potential impacts of noise emissions from the seismic source on marine reptiles (turtles) during the acquisition of the survey are considered to be slight and short-term. Impacts are likely to be

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restricted to temporary behavioural changes (avoidance) to transient turtles that may pass within 3.87 km of the seismic source. Turtles would be exposed to noise levels above behavioural threshold levels for a short period of time as the vessel moves through the survey area (up to 80-days).

Seabirds

Impact Assessment

Very little is known about the effects of intense underwater sound (e.g. seismic surveys) on seabirds. However, impacts to seabirds have not been observed previously during seismic surveys (Turnpenny and Nedwell, 1994), and it is generally thought that noise produced from activities associated with seismic surveys may impact only those species of birds that spend large quantities of time underwater, either swimming or plunge diving while foraging for food (US DoIMMS, 2004). Pichegru et al. (2017) found that penguins showed a strong avoidance of their preferred foraging areas during seismic activities, foraging significantly further from the survey vessel when in operation and increasing overall foraging effort.

As outlined in **Section 4.6.4**, 21 species of birds were identified by the EPBC Act PMST as potentially occurring within the Operational Area or EMBA, including three threatened species. There are no BIAs for birds located within the Operational Area.

Birds foraging within the Operational Area have the potential to be exposed to increased sound levels generated by the operating seismic source, while diving for small pelagic fishes near the sea surface. Such behaviours may result in a startle response during diving. Birds resting on the surface of the water in proximity to the seismic vessel have limited potential to be affected by sound emissions underwater due to the limited transmission of sound energy between the water/air interface, but may be startled by seismic pulses in close proximity to the seismic source. However, given the likely avoidance response from fish and other prey species in waters immediately surrounding the seismic source, birds are unlikely to forage near the operating seismic source. In the unlikely event that birds dive and forage near the seismic source, this is likely to only affect individual birds, resulting in a startle response with the affected birds expected to move away from the area as a result.

Seabirds– Impact Assessment Conclusion

In the absence of foraging BIAs it is not likely that seabirds would be impacted by the seismic survey. The behaviour and distribution of some fish may be affected for short periods during and after exposure to the seismic source, which may result in short-term and localised changes in the distribution of target prey species for some bird species. However, it is expected that the behaviours and distribution of prey at any one time will remain largely unaffected within the Operational Area. Furthermore, it is expected that wedge-tailer shearwaters will not be displaced from the wider areas of the breeding BIA. Therefore, impacts to seabird populations are extremely unlikely to occur.

Commercial Fisheries

Noting that no commercial fisheries operate within or near the Operational Area (refer to **Section 4.10.2**) and the Operational Area does not provide suitable habitat or water depths for target fish or crustacean species, no physical or behavioural impacts are predicted to commercial fish stocks and no impacts are predicted to commercial fishery catch rates.

Commercial Fisheries – Impact Assessment Conclusion

Based on the assessment above and the implementation of the identified control measures, the consequence of occasional short-term and localised disturbance to the target species and catch rates of commercial fisheries is of no lasting effect (less than one month) and impacts will not be significant to commercial fisheries.

Marine Protected Areas

Impact Assessment

As described in **Section 4.9**, the Operational Area does not overlap with any Commonwealth or State Marine Parks. However, Australian Marine Parks (AMPs) are located in the wider EMBA that are part of the North-west Marine Park Networks.

The nearest marine park is the Gascoyne AMP, located 33 km south of the Operational Area and approximately 44 km of the Active Source Area at the closest point. Maximum received sound levels at the boundary of the Gascoyne AMP are predicted to be approximately 140 dB re 1 µPa (SPL).

The potential impacts to the natural, social and economic values of the Gascoyne AMP are summarised as follows.

- Exmouth Plateau KEF – The Operational Area and Active Source Area are located within the KEF. As assessed above, the potential impacts to benthic communities will be highly localised, temporary and negligible in the context of natural variability. The productivity, ecological function and value of the KEF will not be affected.
- Continental slope demersal fish communities KEF – The KEF is located over 150 km from the Active Source Area. Underwater sound emissions will not affect the demersal fish communities in this KEF.

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- Canyons linking Cuvier abyssal plain and Cape Range peninsula KEF – The KEF is located over 105 km from the Active Source Area. Underwater sound emissions will not affect the benthic invertebrate or fish communities in this KEF.
- Commonwealth waters adjacent to Ningaloo Reef KEF – The KEF is located over 170 km from the Active Source Area. Underwater sound emissions will not affect the coral reef communities, deep water filter feeder communities or marine fauna that aggregate or migrate within the KEF.
- Humpback whale migratory pathway – As assessed above, received sound levels at the humpback whale migration BIA are predicted to be below 130 dB re 1 μ Pa SPL. No significant behavioural response is expected and the BIA is well beyond the maximum range in which TTS effects could occur.
- Pygmy blue whale migratory pathway and possible foraging habitat – As assessed above, the animat modelling demonstrates that TTS effects are not expected to occur in the migration BIA. Impacts to cetaceans are likely to be limited to temporary behavioural changes (avoidance) in individuals migrating through the Operational Area. Received sound levels at the pygmy blue whale foraging BIA are predicted to be below 130 dB re 1 μ Pa SPL. No significant behavioural response is expected and the foraging BIA is well beyond the maximum range in which TTS effects could occur.
- Interesting habitats for marine turtles – As assessed above, no impacts are expected to turtles within designated interesting habitats, which are located over 150 km from the Active Source Area.

Given that the other marine parks within the EMBA are located a greater distance from the Operational Area no impacts will occur as a result of underwater sound from the survey.

The objectives of the North-west Marine Parks Network Management Plan are to provide for:

- the protection and conservation of biodiversity and other natural, cultural and heritage values of marine parks in the North-west Network
- ecologically sustainable use and enjoyment of the natural resources within marine parks in the North-west Network, where this is consistent with objective (a).

The Petroleum Activities Program will be undertaken in a manner that is consistent with the management objectives for the AMPs and the North-west Marine Park Network. No long-term impacts are predicted and the values will be conserved and protected.

Marine Protected Areas – Impact Assessment Conclusion

Based on the proposed timing and duration (up to 80-days) of the seismic acquisition and the control measures proposed, predicted noise levels from seismic acquisition are not considered likely to cause any ecologically significant impacts to the natural values of the AMPs.

Cumulative Assessment

Previous Seismic Surveys

Cumulative impacts from successive seismic surveys in the same area can occur when timing between the surveys is less than the recovery rate of any potential receptors, which can be in the order of minutes to hours for some receptors (e.g. zooplankton and fish), or weeks to months for others (e.g. benthic invertebrates), as described above. A summary of the marine seismic surveys that have been undertaken in the last five years (2016-2021) within approximately 150 km of the Scarborough 4D B1 MSS Active Source Area is presented in **Table 6-10** and **Figure 6-4**. As shown in **Table 6-10** and **Figure 6-4**, there is no spatial overlap between the Scarborough 4D B1 MSS Operational Area and any other seismic survey Operational Areas.

Table 6-10: Previous seismic surveys completed within 150 km of the Scarborough 4D B1 MSS from 2016-2021

Survey Name	Operator	Acquisition Period(s)	Spatial overlap
Cimatti 4D MSS	Woodside Energy Ltd	13/04/2020–23/04/2020	None
Laverda 4D MSS	Woodside Energy Ltd	09/03/2020–11/04/2020	None
Harmony 4D MSS	Woodside Energy Ltd	12/02/2020–04/03/2020	None
Pluto 4D MSS	Woodside Energy Ltd	05/01/2020–09/02/2020	None
Bianchi-Hockey 3D MSS	Quadrant Northwest Pty Ltd	23/01/2017–09/03/2017	None
Exmouth SLB15 MC 3D MSS	Schlumberger Australia	07/12/2016–01/05/2017	None
Gorgon OBN MSS	Chevron Australia Pty Ltd	03/11/2015–07/04/2016	None

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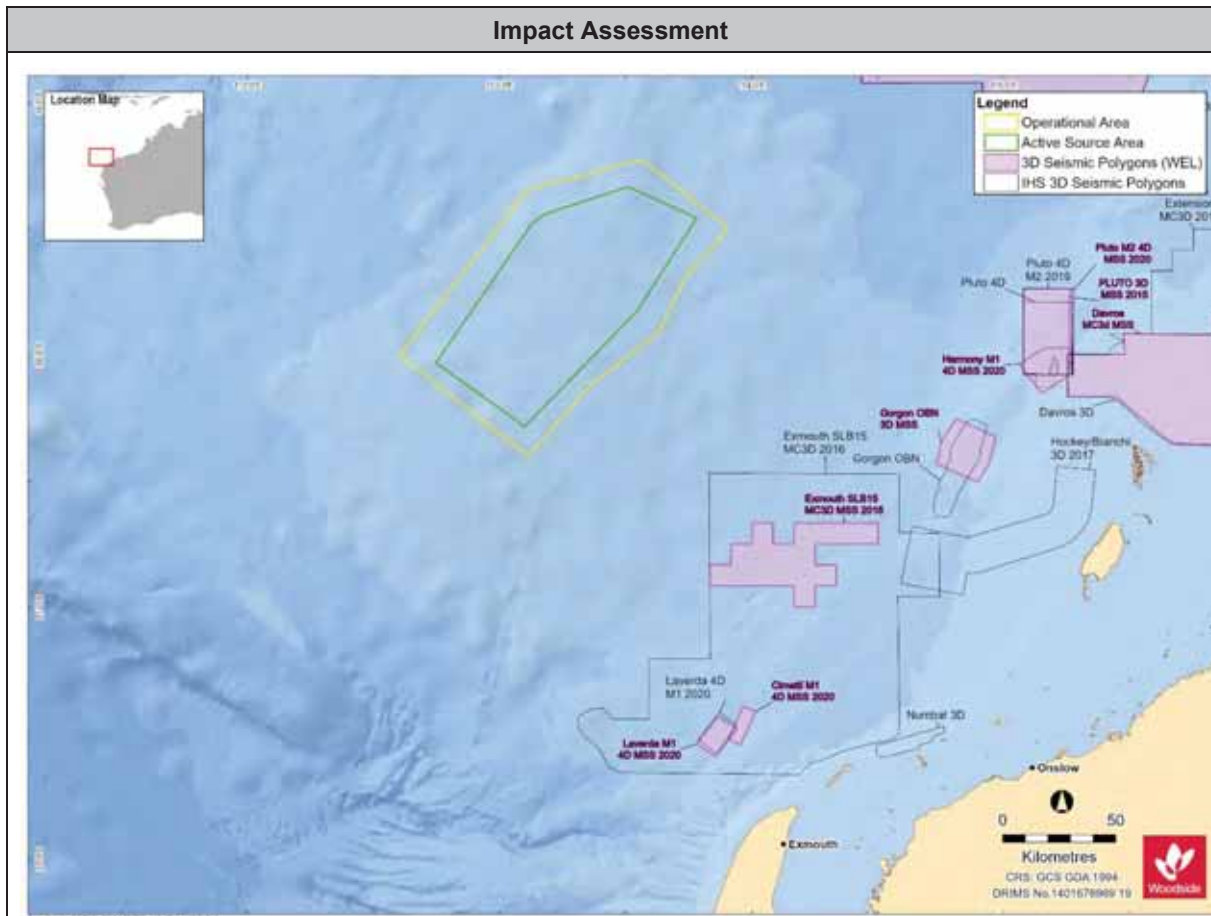


Figure 6-4: Previous seismic surveys that have occurred in the region

Marine fauna

The footprint of any significant underwater noise effects to marine fauna resulting from the proposed seismic survey has been assessed as being within approximately 22 km from the seismic source, based on the maximum range to TTS and behavioural effects for any receptor, in this case pygmy blue whales. However, a 150 km buffer has been selected as a conservative criterion to assess potential cumulative impacts. The maximum recovery rate for marine fauna receptors is in the order of weeks to months, particularly for sharks, marine turtles and cetaceans. Given that there have been no seismic surveys completed over the same area of seabed as the Scarborough 4D B1 MSS in the past five years, ecological receptors are expected to have recovered.

Therefore, cumulative impacts to marine fauna are not expected to occur as a result of any of the identified previous seismic surveys in the region and the proposed Scarborough 4D B1 MSS.

Commercial fisheries

There is only one Commonwealth managed fishery (Western Deepwater Trawl Fishery) and one State managed fishery (West Coast Deep Sea Crustacean Managed Fishery) that have historically had catch/effort within the Operational Area, however there has been no recent fishing catch/effort within the Operational Area from 2008-2019 (Patterson et al., 2020) and 2010-2019 (DPIRD, 2021), respectively (refer to **Section 4.10.2**).

There are three previous seismic surveys within 150 km of the Scarborough 4D B1 MSS Operational Area (Cimatti 4D MSS, Laverda 4D MSS and Exmouth SLB15 MC 3D MSS) with partial overlap with the Western Deepwater Trawl Fishery management boundary and West Coast Deep Sea Crustacean Managed Fishery management boundary. The most recent seismic survey (Cimatti 4D MSS) was completed in late-April 2020. It is acknowledged that the behaviours and distribution of pelagic fish species could be affected for hours to days following exposure, as a result of potential disturbance to more sound-sensitive prey species. Crustaceans were found to recover from impacts from seismic noise exposure within weeks to months after exposure. No long-term impacts on the abundance or community structure of either species were not found. Therefore, it is expected that any impacts to commercially targeted fish or crustacean species will have recovered. Given the lack of recent fishing effort within the Operational

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Area, the Scarborough 4D B1 MSS is expected to have limited to no impact to this commercial fishery, and no cumulative impacts are expected to occur.

Concurrent Seismic Surveys

Over the scheduled duration of the Scarborough 4D B1 MSS there are four other seismic surveys proposed in the broader NWMR. **Table 6-11** presents the seismic surveys that may occur within the same EP timeframes, and have either been accepted by NOPSEMA or have been submitted to NOPSEMA for public comment period or assessment. The below assessment does not assess cumulative impacts from seismic surveys in the region that occur after the Scarborough 4D B1 MSS or that have not yet submitted an Environmental Plan to NOPSEMA.

Table 6-11: Other potential seismic surveys occurring in the region

Survey Name	Operator	Survey Location	Survey Timing	EP Status
Capreolus-2 3D MSS	TGS-NOPEC Geophysical Company Pty Ltd	~ 275 km east of the Operational Area	1/10/2020–31/12/2024	The EP is accepted and valid to 2024
INPEX 2D MSS (WA-532-P, WA-533-P, WA-50-L)	INPEX	~ 700 km east of the Operational Area	1/11/2021–31/05/2022 Contingency: 1/11/2022–31/05/2023; 1/11/2023–31/12/2023	The EP is accepted and valid to 2023
Archer 3D MSS	Santos WA Northwest Pty Ltd	~450 km east of the Operational Area	1/02/2021–31/07/2021; 1/02/2022–31/07/2022	The EP is accepted and valid to 2022
Keraudren Extension 3D MSS	Santos WA Northwest Pty Ltd	~500 km east of the Operational Area	1/02/2020–31/07/2020; 1/02/2021–31/07/2021; 1/02/2022–31/07/2022	The EP is accepted and valid to 2022

The individual sound fields produced by separate concurrent seismic surveys has the potential to interact where sound waves from the separate seismic sources may be received either in synchrony (“in synch”) or out of synchrony (“out of synch”). The way in which these sound waves might react was considered by JASCO Applied Sciences and ERM for the Santos Keraudren Extension 3D MSS EP (Santos, 2020a). An increase in sound levels may occur temporarily at locations where the received signals from each source occur in synch. However, in most instances, pulses will be out of synch and increased received PK-PK sound levels will not occur often.

Given that different seismic sources are unlikely to be discharged at exactly the same time, different surveys will have different source impulse intervals. Additionally, given that each pulse will be a few hundred milliseconds in duration with several seconds in between, pulses will generally be out of synch with one another. Pulses may still line up occasionally for a brief moment at some locations, and when they do, the amplitudes will then be too unequal for the sum level to differ much from the stronger of the two components. However, in the unlikely case that two pulses interact and are exactly synchronised with each other, then the combined SPL would be 3 dB higher than the individual SPL, which represents a doubling of sound energy. Further explanation is provided in Santos (2020a).

A minimum separation distance of at least 40 km will be maintained between the Scarborough 4D B1 MSS and any other concurrently operating seismic source during data acquisition activities to prevent acoustic interference and preserve seismic data integrity. As a result of this separation, underwater sound from the seismic source is not expected to combine to significantly raise the SPL to levels which receptors may be exposed. Modelling of the seismic source for the Scarborough 4D B1 MSS shows that sound levels will be below 150 dB re 1µPa at 20 km from the source (half way between two seismic sources at their minimum separation distance) (Koessler et al. 2021; **Appendix G**). A combination of seismic sound from two similar seismic sources at this distance would therefore be expected to result in an SPL of no greater than 153 dB re 1µPa.

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Impact Assessment

While the overall sound levels are not expected to be significantly increased, it is acknowledged that the result of multiple seismic vessels operating concurrently will represent a wider spatial area of potential exposure to seismic sound for receptors, as well as the potential for receptors to be exposed to separate sound fields from multiple surveys. There are no planned seismic surveys with overlap with the Scarborough 4D B1 MSS Operational Area.

Zooplankton

Based on the maximum worst case mortality exposure suggested by McCauley et al. (2017) and modelling completed by CSIRO (Richardson et al., 2017), impacts to zooplankton are only expected to be significant within a short range (< 15 km) of seismic survey areas. The maximum predicted distances to mortality for zooplankton during the Scarborough 4D B1 MSS was approximately 110 m (**Table 6-2**). Beyond 22 days of acquisition, Richardson et al. (2017) found that no further relative increase in zooplankton mortality occurs, due to recruitment of zooplankton via currents from adjacent areas, and conditions return to normal within a few days of a survey ceasing. At the regional scale, these impacts are not expected to be significant (Richardson et al., 2017). Further, natural mortality rate in zooplankton can be high, and therefore limited impacts are expected relative to the natural variation in zooplankton concentrations and mortality rate.

There are no significant, discernible cumulative impacts to zooplankton, expected to occur given the minimum separation distance of 40 km between the Scarborough 4D B1 MSS and any other operating seismic sources. The cumulative impacts to zooplankton are expected to be negligible.

Benthic Invertebrates

The maximum worst case impacts reported for invertebrates include sub-lethal impacts such as statocyst impairment, temporary reduced immune response function, temporary impaired reflexes, and potentially some chronic effects that lead to mortality of a very small number of sessile benthic invertebrates over and above natural mortality rates. Repeated exposures to seismic noise for some sessile invertebrates, such as bivalves, have been observed to result in additional chronic mortality in the weeks and months following exposure compared with invertebrates exposed to just one pass of a seismic source (i.e. an increase of approximately 2-5%) (Day et al., 2016b). However, such effects may still be within the range of naturally occurring mortality rates documented in the wild (Day et al., 2017). Therefore, given that repeat exposures will affect only a small proportion of benthic organisms, and the natural cycle of death and recruitment will occur in parallel, the impacts of repeated seismic exposure may not be detectable from natural fluctuations in benthic invertebrates.

The Scarborough 4D B1 MSS seismic source will be operated in water depths >800 m, where benthic invertebrate diversity and abundance are expected to be low, and it is not expected that there would be any impact to benthic invertebrates from noise emissions from the seismic source. Impacts to benthic invertebrates during other seismic surveys are expected to occur at close range to the seismic source, within a few hundred metres.

Given the minimum separation distance of 40 km between the Scarborough 4D B1 MSS and other operating seismic sources, no significant, discernible cumulative impacts to benthic invertebrates are expected to occur.

Fish, Sharks and Rays

No significant, discernible cumulative impacts to fish, sharks and rays are expected to occur given the minimum separation distance of 40 km between the Scarborough 4D B1 MSS and any other operating seismic sources. Behavioural impacts to fish are expected to occur within tens to hundreds of metres of a seismic source (Popper et al., 2014), returning to normal within minutes to hours or days, depending on the species, hearing sensitivity and situational context.

Individual groups of fishes in each seismic survey Active Source Area may be subject to occasional behavioural disturbances, however no cumulative overlap of strong behavioural responses is expected to occur. Some changes in fish abundance and distribution could occur as a result of sound exposure from multiple operating seismic sources, although these changes are expected to return to normal within hours to days.

Whale sharks may experience localised disturbance when passing each of the other seismic survey Operational Areas, particularly as they overlap with a whale shark foraging BIA. However, as all vessels will maintain a minimum separation distance of 40 km, and the Scarborough 4D B1 MSS Active Source Area does not overlap with the whale shark foraging BIA, separate and isolated incidents of disturbance are not expected to result in significant cumulative impacts.

Cetaceans

There are no significant, discernible cumulative impacts to cetaceans, expected to occur given the minimum separation distance of 40 km between the Scarborough 4D B1 MSS and any other operating seismic sources. As above, combined seismic sound from two similar seismic sources at a distance of half the minimum separation distance (20 km) would be expected to result in an SPL lower than the defined behavioural response thresholds for cetaceans of 160 dB re 1 μ Pa (**Table 6-5**). Any behavioural avoidance or deviations are expected to be small relative to the long distances (i.e. thousands of kilometres) over which cetaceans usually travel during their migrations.

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Table 6-12 provides an assessment of cumulative impacts to migrating pygmy blue whales. There are no other potential seismic surveys occurring near the pygmy blue whale foraging BIA, located 154 km south of the Scarborough 4D B1 MSS Operational Area.

Table 6-12: Assessment of cumulative impacts to migrating pygmy blue whales

	Pygmy blue whales
Woodside Scarborough 4D B1 MSS	<p>The Scarborough 4D B1 MSS Operational Area is located approximately 14 km north-west of the pygmy blue whale migration BIA.</p> <p>At its closest point, the Active Source Area is 25 km from the migration BIA.</p> <p>TTS effects to pygmy blue whales were predicted to occur up to 22 km from the seismic source (Table 6-7). Therefore, no TTS effects are predicted to migrating pygmy blue whales within the migration BIA.</p> <p>Short-term behavioural impacts may occur up to 7.3 km from the seismic source (Table 6-6). Therefore, short-term behavioural impacts to migrating pygmy blue whales are not expected within the migration BIA.</p>
TGS Capreolus-2 3D MSS (TGS, 2020)	<p>The Capreolus-2 3D MSS overlaps with the pygmy blue whale migration BIA. The seismic source will not be operated within 24 km of the pygmy blue whale migration BIA during the migration periods for the species (April to August and October to December).</p> <p>Maximum predicted distances to TTS thresholds for pygmy blue whales within the migration BIA is 24 km. Therefore, no TTS effects are predicted to migrating pygmy blue whales within the migration BIA.</p> <p>Short-term behavioural impacts may occur up to 9.5 km from the seismic source. Therefore, short-term behavioural impacts to migrating pygmy blue whales are not expected within the migration BIA.</p>
INPEX 2D MSS (INPEX, 2021)	<p>The INPEX 2D MSS overlaps with the pygmy blue whale migration BIA. The seismic source will not be operated within 24 km of the pygmy blue whale migration BIA during the migration periods for the species (April to August and October to December).</p> <p>The maximum predicted distance to TTS thresholds for pygmy blue whales is approximately 23 km. Therefore, no TTS effects are predicted to migrating pygmy blue whales within the migration BIA.</p> <p>Short-term behavioural impacts may occur up to 6.5–8 km from the seismic source in continental slope waters. Migrating pygmy blue whales may deviate from their normal course by several kilometres to avoid the seismic sound source, however this distance does not constrain the migration path of pygmy blue whales. Therefore, occasional and localised short-term behavioural impacts are predicted to migrating pygmy blue whales within the migration BIA.</p>
Santos Keraudren Extension 3D MSS (Santos, 2020a)	<p>The Keraudren Extension 3D MSS Operational Area is located approximately 30 km north-west of the pygmy blue whale migration BIA, and the Active Source Area is located over 100 km from the pygmy blue whale migration BIA. Timing of the survey also only coincides with part of the northbound migration.</p> <p>Maximum predicted distances to TTS thresholds for pygmy blue whales is 31 km. Therefore, no TTS effects are predicted to migrating pygmy blue whales within the migration BIA.</p> <p>Short-term behavioural impacts may occur up to 9 km from the seismic source. Therefore, short-term behavioural impacts to migrating pygmy blue whales are not expected within the migration BIA.</p>

Based on the assessment provided in **Table 6-12**, no significant cumulative TTS or behavioural impacts are expected to pygmy blue whales within the migration BIA. No TTS or behavioural impacts as a result of the Scarborough 4D B1 MSS seismic survey are expected to migrating pygmy blue whales, and the other concurrent planned seismic surveys in the region do not constrain the migration route for pygmy blue whales (only partial overlap with the Operational Areas and migration BIAs). It is expected that pygmy blue whales will continue to utilise the migration routes without injury or displacement.

Other cetacean species that may occur within the region, for example humpback, fin and sei whales, are expected to be transient and no changes to migration or other life stages are expected. Localised disturbances may occur when passing the concurrent seismic surveys, however these isolated incidents of disturbance are not expected to result in significant cumulative impacts.

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Impact Assessment

Marine Reptiles

No significant, discernible cumulative impacts to marine turtles are expected to occur given the minimum separation distance of 40 km between the Scarborough 4D B1 MSS and any other operating seismic sources. Any behavioural avoidance or deviations are expected to be small relative to the long distances over which marine turtles usually travel.

Marine turtles may experience a short-term behavioural response up to approximately 4 km from the Scarborough 4D B1 MSS operating source, based on the NMFS criterion of 166 dB re 1 μ Pa SPL (**Table 6-9**). The Scarborough 4D B1 MSS Operational Area is located 135 km north-west of the nearest interesting buffer for flatback turtles, and 147 km north-west of the nearest Habitat Critical for flatback turtles (refer to **Section 4.6.2**).

Given that there is no expected impact to marine turtles as a result of the Scarborough 4D B1 MSS, no cumulative behavioural effects to marine turtles are expected within interesting buffer BIAs or Habitat Critical areas. Localised disturbances to marine turtles may occur when passing the concurrent seismic surveys, however these isolated incidents of disturbance are not expected to result in significant cumulative impacts.

Commercial Fisheries

Cumulative impacts to commercial fisheries may occur if multiple seismic surveys occur concurrently or in quick succession within a fishery, resulting in displacement of commercial fishing vessels or changes in catch rates due to behavioural changes in target fish or crustacean species. The expected range and duration of impacts to fish abundance, distribution and catch rates is relatively small compared to wider areas within which the fisheries operate.

There is only one Commonwealth managed fishery (Western Deepwater Trawl Fishery) and one State managed fishery (West Coast Deep Sea Crustacean Managed Fishery) that have historically had catch/effort within the Operational Area, however there has been no recent fishing catch/effort within the Operational Area from 2008-2019 (Patterson et al., 2020) and 2018-2022 (DPIRD, 2022), respectively (refer to **Section 4.10.2**).

There are no concurrent seismic surveys proposed in the region that overlap with the Western Deepwater Trawl Fishery or the West Coast Deep Sea Crustacean Managed Fishery. In the absence of any other surveys, and lack of recent fishing effort within the Scarborough 4D B1 MSS Operational Area, cumulative impacts to commercial fisheries are not expected.

Concurrent Woodside Activities

Scarborough drilling and completion activities may be undertaken within WA-61-L; however, there will be no temporal overlap with acquisition of the Scarborough 4D B1 MSS (activities will not occur concurrently) and therefore no cumulative underwater noise impacts are predicted with from this activity (**Section 6.3**).

Concurrent Other Oil & Gas Projects

Acquisition of the Scarborough 4D B1 MSS may coincide with other oil and gas activities in the region – e.g. drilling of the Sasonof-1 exploration well in WA-519-P, and activities associated with the Jansz-Io Compression project. However, these activities will take place at locations that are >50 km (Sasonof-1) and >90 km (Jansz-Io) from the Active Source Area, and consequently no cumulative underwater noise impacts are predicted with from these activities.

Demonstration of ALARP

<i>Control Considered</i>	<i>Control Feasibility (F) and Cost/Sacrifice (CS)⁵</i>	<i>Benefit/Reduction in Impact</i>	<i>Proportionality</i>	<i>Control Adopted</i>
Legislation, Codes and Standards				
Application of EPBC Policy Statement 2.1 Part A Standard Management Procedures to whales and Part B.4, as outlined below: <ul style="list-style-type: none"> observation zone: 	F: Yes. CS: Extending the shut-down zones may result in additional shut-downs potentially resulting in extending the survey and additional costs	Reduces the likelihood of individual whales being within proximity of the acoustic source where TTS could occur and eliminates the potential for PTS. Single pulse PTS and TTS impacts to LF-cetaceans (such as pygmy blue	Benefits outweigh cost/sacrifice. Benefits outweigh cost/sacrifice. Extending the shut-down zone further for pygmy	Yes C 4.1

⁵ Qualitative measure

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<p>3 km+ to the limits of visibility for large unidentified whales 2 km to 3 km for all other whales</p> <ul style="list-style-type: none"> • shut-down zone: • to limits of visibility for positively identified (certain or probable confidence level) pygmy blue whales or large unidentified whales; • 2 km for all whales • Observation and compliance reporting: <p>Use of trained vessel crew in marine fauna observations and monitoring compliance to Policy Statement 2.1. Records kept of marine fauna observations during all surveys.</p> <ul style="list-style-type: none"> • Pre start-up visual observation (30 minutes) • Soft start procedure (30 minutes) • Start-up delay procedure (if sighting occurs) • Operations procedure • Stop work (shut down) procedure • Night-time and low visibility procedure 		<p>whales) are predicted to be constrained to within 40 m and 60 m of the seismic source, respectively (Table 6-6). Therefore, application of a shut-down zone of a minimum of 2 km is an effective control in ensuring that no PTS and TTS impacts will occur to pygmy blue whales from short-term exposure to seismic noise at close range to the source.</p> <p>As the activity is taking place within the distribution range for pygmy blue whales where there is a lower possibility of encountering individual whales as compared to the migration BIA (Thums et al., 2022). If this occurs, the application of EPBC Policy Statement 2.1 Part A Standard Management Procedures and extended observation and shutdown zones (Part B.4) will minimise the likelihood of TTS effects.</p> <p>The pygmy blue whale migration BIA is located ~25 km from the Active Source Area. Based on an overlap of three different metrics (occupancy, number of whales in a cell and move persistence) Thums et al. (2022) identified the most important foraging areas for pygmy blue whales offshore from WA. This included the area off the shelf edge from Ningaloo Reef to the Rowley Shoals but not the Operational Area.</p> <p>Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered of low likelihood but possible, with the occasional individual or small group of whales within the Operational Area and mostly likely in the peak period of the northbound migration (May and June), based on the recorded presence of one pygmy blue whale.</p>	<p>blue whales was considered, including:</p> <ul style="list-style-type: none"> • shut-down zones past the limits of visibility; and • extending shut-down zone to the limits of visibility for large unidentified whales. <p>However as impacts to pygmy blue whales are already reduced to ALARP and acceptable levels considering impacts will be inherently limited to 'Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes', no TTS is predicted in the pygmy blue whale migration BIA and no significant behavioural impacts are predicted, further extension of the shut-down zones is considered disproportionate to the environmental benefits.</p> <p>Given the application of EPBC Act Policy Statement 2.1 Part A Standard Management Measures and Part B.4 - Increased</p>	
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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
		<p>Cumulative PTS and TTS impacts to LF-cetaceans (such as pygmy blue whales) are predicted to be constrained to within 0.13 km and ~22 km of the seismic source, respectively (Table 6-7). A tagging study of blue whales showed that migrating individuals can travel 50 to 100 km per day (Double et al., 2014). This equates to an average swimming speed of 2-4 km/hr over a 24-hour period. In comparison, the seismic vessel will be traveling at around 4.5 knots (~8 km/hr). Migrating pygmy blue whales at greatest risk of seismic noise exposure are likely to be moving parallel to the survey lines (i.e. migrating). At a speed of 8 km/hr it will take the survey vessel ~9 hours on average to acquire lines in the Active Source Area (with the longest line taking ~12.5 hours), and then the source is shut down during line turns. As sound levels from the seismic source will only exceed the PTS SEL_{24hr} metric for LF-cetaceans at a range up to 0.13 km from the vessel, application of the 'to the limits of visibility' shut-down zone will ensure that this threshold is not exceeded. Similarly for cumulative TTS exposure, sound levels from the seismic source will exceed the TTS SEL_{24hr} metric for LF-cetaceans for up to 22 km from the vessel. As a whale is expected to pass through the ensonified area in less than 24-hours, an isolated individual is highly unlikely to remain within the reported SEL_{24hr} radius for the full 24-hours leading to TTS exposure, particularly due to the lack of foraging grounds within the region.</p>	precaution zones and buffer zones, the risk of TTS is reduced to ALARP and acceptable levels.	

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
<p>Application of EPBC Act Policy Statement 2.1 Part B.1 – MMOs:</p> <ul style="list-style-type: none"> Employ four dedicated MFOs to undertake observations for EPBC Act Policy Statement 2.1. 	<p>F: Yes. CS: Minimal cost. Standard practice.</p>	<p>Two dedicated MFOs per observing vessel (seismic vessel and spotter vessel) provides improved marine fauna identification, distance estimation and implementation of EPBC Act Policy Statement 2.1.</p> <p>Two MFOs on board each vessel allows at least one MFO to be undertaking observations with the potential to increase effort as needed.</p> <p>Two MFOs on board each vessel also provides contingency in the event one is unavailable and for managing work shift fatigue.</p>	<p>Benefits outweigh cost/sacrifice.</p>	<p>Yes C 4.2</p>
<p>Application of EPBC Act Policy Statement 2.1 Part B.5 – PAM:</p> <ul style="list-style-type: none"> A PAM system will be installed aboard the survey vessel to detect odontocete whales (specifically sperm and beaked whales). Employ two dedicated PAM operators wherever possible. 	<p>F: Yes CS: Minimal cost.</p>	<p>Two dedicated PAM operators provides improved marine fauna identification and implementation of EPBC Act Policy Statement 2.1.</p> <p>Two PAM operators on board provides contingency in the event one is unavailable and for managing work shift fatigue.</p>	<p>Benefits outweigh cost/sacrifice.</p>	<p>Yes C 4.3</p>
<p>Application of EPBC Act Policy Statement 2.1 Part B.6 – Adaptive Management measures to minimise the potential impacts to pygmy blue whales from seismic noise. The following adaptive measures will be implemented:</p> <ul style="list-style-type: none"> If there are three or more shut-downs for pygmy blue whales within a 24-hour period (including spotter vessel MFO shutdowns), then the seismic operations must not be undertaken thereafter at night-time or during low visibility conditions. <p>Seismic operations cannot resume at night-time or during low visibility conditions, until there has been a cumulative 24-hour period of seismic</p>	<p>F: Yes CS: Increased costs of the survey during no seismic operations, prolonging the survey duration.</p> <p>Any delays to the seismic program could result in significant cost and operational implications.</p> <p>It would also extend the duration of the survey, potentially increasing impacts to other receptors.</p> <p>However, observation zone has been selected to be protective of pygmy blue whales.</p>	<p>PTS or TTS effects to pygmy blue whales are not predicted to occur from exposure to a single impulse. However, adaptive management measures are considered conservative and appropriate to provide protection to pygmy blue whales that may be exposed to multiple pulses at close range.</p>	<p>Benefits outweigh cost/sacrifice.</p>	<p>Yes C 4.4</p>

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
operations (daylight hours with good visibility) during which there has been less than three shut-downs for pygmy blue whales				
<p>EPBC Act Policy Statement 2.1 Part B.3 – Use of additional vessels to detect presence of cetaceans, during all daylight activities with seismic source discharge:</p> <ul style="list-style-type: none"> Use of two MFOs aboard a dedicated spotter vessel travelling ~5 km out ahead of the seismic vessel to implement C 4.1. 	<p>F: Yes. Increases potential likelihood of environmental impacts, health and safety impacts to personnel due to additional vessel in the field.</p> <p>CS: Significant cost of additional vessel and personnel.</p>	<p>Two dedicated additional MFOs aboard a dedicated spotter vessel provides improved marine fauna detection and identification, and implementation of EPBC Act Policy Statement 2.1. The spotter vessel MFOs will work in tandem with survey vessel MFOs to implement C 4.1 (Policy Statement 2.1 Part A Standard Management Procedures and Part B.4) and C 4.4 (Adaptive Management Measures for pygmy blue whales).</p> <p>Stationing the spotter vessel ~5 km ahead of the survey vessel and acoustic array allows for the spotter vessel MFO observation zone (3km+ in good visibility) to extend ahead of the seismic source out to and beyond the 7.28 km behavioural disturbance distance for LF cetaceans. As a result of the extended MFO observation coverage there is an extended range for the implementation of the PBW / large unidentified whale shut down zone. Thus minimising the potential for biologically significant behavioural disturbances.</p> <p>Adaptive management and the use of the pygmy blue whale sightings (e.g numbers are greater than predicted) to trigger the implementation of this control were considered in line with the precautionary principle, to limit potential impacts. However, this could not be implemented due to logistical constraints surrounding vessel availability at short notice.</p> <p>As such the control will be applied throughout the</p>	Benefits outweigh cost/sacrifice.	Yes C 4.6

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
		duration of the activity extending beyond the precautionary principle.		
The seismic source will not be discharged outside of the Active Source Area.	F: Yes CS: CS: Minimal cost. Standard practice.	Limits the effects of underwater sound to the extent that is assessed in this EP.	Benefits outweigh cost/sacrifice.	Yes C 5.1
Good Practice				
Seismic source validation.	F: Yes CS: Source modelling can be undertaken at minimal cost and relatively quickly.	If the seismic source selected for the Petroleum Activities Program is different to the source modelled and assessed in Koessler et al. (2021; Appendix G), then additional source modelling will be undertaken to confirm whether the sound levels are consistent with levels assessed as acceptable in this EP.	Benefits outweigh cost/sacrifice.	Yes C 3.1
No operation of the seismic source within 25 km of the pygmy blue whale migration BIA.	F: Yes CS: Minimal cost. The Active Source Area is located >25 km from the pygmy blue whale migration BIA.	ANIMAT modelling (Appendix G) predicts that the maximum range at which pygmy blue whales may experience TTS is at 21.73 km. Preventing operation of the seismic source within 25 km of the pygmy blue whale migration BIA provides some additional conservatism and prevents TTS effects and injury to pygmy blue whales in the migration BIA.	Benefits outweigh cost/sacrifice.	Yes C 4.5
A 40 km separation distance between the Petroleum Activities Program and any identified concurrent seismic survey	F: Yes CS: In the event that other surveys are present in the region, a 40 km separation distance may result in delays due to vessel downtime or loss of survey area.	The Bureau of Ocean Energy Management (BOEM, 2014) published an environmental review of geological and geophysical survey activities in the south Atlantic Ocean. To minimise impacts to marine life by providing a 'corridor' between vessels, the environmental impact statement from this review included a requirement for a 40 km geographic separation distance (based on worst case scenarios) between the sources of simultaneous seismic surveys.	Benefits outweigh cost/sacrifice.	Yes C 6.1

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
Reduce size of Active Source Area to minimise potential for behavioural responses in pygmy blue whales	F: Yes CS: Significant cost and schedule impacts. The Active Source Area has been designed to cover both the Scarborough and Jupiter fields, so that the survey provides new 3D / baseline 4D seismic data over both fields. Reducing the size of the Active Source Area would mean that the Jupiter extension would have to be acquired as part of a separate additional survey.	There is no overlap between the Active Source Area or the Operational Area with the pygmy blue whale migration BIA. Given the implementation of adaptive management measures and the absence of any TTS effects within the pygmy blue whale migration BIA, the potential impacts of noise emissions from the seismic source on pygmy blue whales are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause injury effects. Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered low. However, based on the recorded presence of one pygmy blue whale overlapping with the Operational Area there may be the occasional individual or small group of whales transiting the area, mostly likely in the peak period of the northbound migration (May and June). An additional control of a dedicated spotter vessel travelling ahead of the seismic vessel increases the ability to detect pygmy blue whales in this peak northbound migratory period, refer to C 4.6 .	Disproportionate. The cost / sacrifice outweighs the benefit gained. Implementing EPBC Policy Statement 2.1 Part A, and selected Part B measures will achieve an acceptable level of risk reduction during the pygmy blue whale northbound and southbound migrations.	No
Professional Judgement – Eliminate				
Reprocess previously acquired data	F: No. Woodside has re-processed the 2004 vintage seismic survey, HEX-003 on two separate occasions, in 2010 and 2018, on the latter occasion the processing involved	Not considered - control not feasible.	Not considered - control not feasible.	No

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
	the implementation of state-of-the-art Full Wave Equation imaging. No further uplift can be gained from this data. Additionally the original survey does not extend over the full Scarborough gas field or over the Jupiter gas field. CS: Not considered – control not feasible.			
Use of alternative technologies to acquire data	F: No. Marine seismic vibrator technology is still in research and development and is yet to be offered commercially. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Vary the timing of the Petroleum Activities Program to avoid migration periods of pygmy blue whales	F: Yes CS: Significant cost and schedule impacts due to difficulties in securing a survey vessel for specific timeframes outside migration periods for pygmy blue whales. Reduces timeframe for acquisition to 4-months (Feb-Mar and Aug-Sept), which would limit the possibility of using a 'vessel of opportunity' that may be in the region.	There is no overlap between the Active Source Area or the Operational Area with the pygmy blue whale migration BIA. Given the implementation of adaptive management measures and the absence of any TTS effects within the pygmy blue whale migration BIA, the potential impacts of noise emissions from the seismic source on pygmy blue whales are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause injury effects. Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered low. However, based on the recorded presence of one pygmy blue	Disproportionate. The cost / sacrifice outweighs the benefit gained. Implementing EPBC Policy Statement 2.1 Part A, and selected Part B measures will achieve an acceptable level of risk reduction during the pygmy blue whale northbound and southbound migrations.	No

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
		<p>whale overlapping with the Operational Area there may be the occasional individual or small group of whales transiting the area, mostly likely in the peak period of the northbound migration (May and June).</p> <p>An additional control of a dedicated spotter vessel travelling ahead of the seismic vessel increases the ability to detect pygmy blue whales in this peak northbound migratory period, refer to C 4.6.</p>		
Professional Judgement – Substitute				
None identified				
Professional Judgement – Engineered Solution				
Reduce seismic source capacity (volume) to minimise potential for behavioural responses in pygmy blue whales	<p>F: Yes</p> <p>CS: Significant cost and schedule impacts. The seismic source specifications were selected following a technical assessment, and a review of legacy seismic survey parameters. The source specifications have considered the range of water depths within the Active Source Area and depth of the targets within the subsurface geology to ensure adequate seismic imaging. It was determined that a maximum volume of 3150 cu in is required to adequately image subsurface prospects, and to provide a 4D baseline for potential future monitoring surveys.</p> <p>Reducing the source capacity would result in the acquisition of inadequate 3D data, potentially requiring all or parts of the</p>	<p>There is no overlap between the Active Source Area or the Operational Area with the pygmy blue whale migration BIA.</p> <p>Given the implementation of adaptive management measures and the absence of any TTS effects within the pygmy blue whale migration BIA, the potential impacts of noise emissions from the seismic source on pygmy blue whales are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause injury effects.</p> <p>Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered low. However, based on the recorded presence of one pygmy blue whale overlapping with the Operational Area there may be the occasional individual or small group of whales transiting the area, mostly likely in the peak period of</p>	Disproportionate. The cost / sacrifice outweighs the benefit gained. Implementing EPBC Policy Statement 2.1 Part A, and selected Part B measures will achieve an acceptable level of risk reduction during the pygmy blue whale northbound and southbound migrations.	No

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
	survey to be re-acquired.	the northbound migration (May and June). An additional control of a dedicated spotter vessel travelling ahead of the seismic vessel increases the ability to detect pygmy blue whales in this northbound migratory period, refer to C 4.6 .		
EPBC Act Policy Statement 2.1 Part B.3 – Use of spotter aircraft to detect presence of cetaceans	F: Yes. Increases potential likelihood of environmental impacts, health and safety impacts to personnel due to aircraft in the field. Unacceptable risk to personnel in operating aircraft so far offshore. CS: Significant cost of aircraft and personnel. Aircraft range limits observation time at the Operational Area requiring multiple aircraft/crew to cover daylight periods.	Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered low. However, based on the recorded presence of one pygmy blue whale overlapping with the Operational Area there may be the occasional individual or small group of whales transiting the area, mostly likely in the peak period of the northbound migration (May and June). Given the implementation of adaptive management measures and the absence of any TTS effects within the pygmy blue whale migration BIA, the potential impacts of noise emissions from the seismic source on pygmy blue whales are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause TTS effects.	Disproportionate. The cost / sacrifice outweighs the benefit gained. Implementing EPBC Policy Statement 2.1 Part A, and selected Part B measures will achieve an acceptable level of risk reduction during the pygmy blue whale northbound and southbound migrations.	No
Use of Unmanned Aerial Vehicles (UAVs – drones) to detect presence of cetaceans	F: Yes. Unproven technology in monitoring cetaceans in offshore marine environments. Dependent on suitable weather conditions (low wind speeds and good visibility). CS: Additional cost of drones and pilots.	Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered low. However, based on the recorded presence of one pygmy blue whale overlapping with the Operational Area there may be the occasional individual or small group of whales transiting the area, mostly	Disproportionate. The cost / sacrifice outweighs the benefit gained. Implementing EPBC Policy Statement 2.1 Part A, and selected Part B measures will achieve an acceptable level	No

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
		likely in the peak period of the northbound migration (May and June). Given the implementation of adaptive management measures and the absence of any TTS effects within the pygmy blue whale migration BIA, the potential impacts of noise emissions from the seismic source on pygmy blue whales are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause TTS effects.	of risk reduction during the pygmy blue whale northbound and southbound migrations.	
Use of sonobuoys to detect presence of cetaceans	F: Yes. Signal reception relies on VHF radio frequencies, and therefore line-of-sight between the transmitter (sonobuoy) and the antenna on the vessel. Therefore, does not extend cetacean detection range beyond that achievable via visual observations (MFOs) or PAM. CS: Additional cost of sonobuoys and operators.	Based on the evidence presented in Thums et al. (2022), the likelihood of encountering migrating or foraging pygmy blue whales is considered low. However, based on the recorded presence of one pygmy blue whale overlapping with the Operational Area there may be the occasional individual or small group of whales transiting the area, mostly likely in the peak period of the northbound migration (May and June). Given the implementation of adaptive management measures and the absence of any TTS effects within the pygmy blue whale migration BIA, the potential impacts of noise emissions from the seismic source on pygmy blue whales are likely to be restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause TTS effects.	Disproportionate. The cost / sacrifice outweighs the benefit gained. Implementing EPBC Policy Statement 2.1 Part A, and selected Part B measures will achieve an acceptable level of risk reduction during the pygmy blue whale northbound and southbound migrations.	No
ALARP Statement				

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Demonstration of ALARP				
<i>Control Considered</i>	<i>Control Feasibility (F) and Cost/Sacrifice (CS)⁵</i>	<i>Benefit/Reduction in Impact</i>	<i>Proportionality</i>	<i>Control Adopted</i>
On the basis of the environmental impact assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type B), Woodside considers the adopted controls appropriate to manage the impacts and risks of noise emissions generated from seismic source. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

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Demonstration of Acceptability	
Receptor	Acceptability Criteria and Assessment
<p>Migratory and threatened cetaceans</p>	<p>Principles of ESD The impact assessment has considered the relevant principles of ESD:</p> <ul style="list-style-type: none"> The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making. Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. <p>Impacts are considered consistent with these principles given controls adopted and that impacts will be inherently limited to 'Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes' (Section 2.6.4).</p> <p>Other principles of ESD were considered not relevant given underwater noise emissions from the seismic source do not represent a threat of "serious or irreversible environmental damage", they will not result in impacts that affect the maintenance or enhancement of the "health, diversity and productivity of the environment" over generational timeframes, and they have no relevance to "improved valuation, pricing and incentive mechanisms."</p> <p>Internal Context The Petroleum Activities Program is consistent with Woodside corporate policies, culture, processes, standards, structure and systems as outlined in the Demonstration of ALARP and Environmental Performance Outcomes, including:</p> <ul style="list-style-type: none"> Woodside Environment and Biodiversity Policy (Appendix A) Woodside Risk Management Policy (Appendix A). <p>External Context Impacts to cetaceans was raised during consultation and this feedback was considered in the finalisation of the EP.</p> <p>Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1</p> <p>Other Requirements The proposed control measures exceed the required standards and control measures set out in EPBC Policy Statement 2.1. Part A Standard Management Measures (DEWHA, 2008).</p>
Statement of Acceptability	<p>The predicted level of impact for migratory and threatened cetaceans is considered to be of an acceptable level given that the:</p> <ul style="list-style-type: none"> the Petroleum Activities Program is consistent with the relevant principles of ESD the proposed controls have considered the environmental consequence and are consistent with Woodside's internal policies, procedures and standards feedback from stakeholders has been taken into consideration impacts and risks to cultural values have been taken into consideration legislative requirements/industry standards have been adopted the Petroleum Activities Program will be managed in a manner that prevents physical injury or displacement of pygmy blue whales from migration and foraging BIA's the Petroleum Activities Program will be managed in a manner that prevents physical injury to pygmy blue whales and other cetacean species the Petroleum Activities Program will be managed in a manner that reduces potential biologically significant behavioural disturbances to pygmy blue whales and other cetacean species the Petroleum Activities Program will be managed in a manner that is consistent with management objectives for relevant WHAs, AMPs, recovery plans and conservation plans/advice the predicted level of impact has been reduced to ALARP. <p style="text-align: center;">Environmental Performance Consideration</p>

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Demonstration of Acceptability	
Receptor	Acceptability Criteria and Assessment
	<p>The proposed activity and control measures are not inconsistent with the requirements of recovery plans or wildlife conservation plans/advice as demonstrated in Section 6.8. The impact assessment has determined that seismic acquisition may be undertaken in a manner that is not inconsistent with the requirements of the Conservation Management Plan for the Blue Whale, specifically that '<i>Anthropogenic noise in biologically important areas will be managed such that any blue whale continues to utilise the area without injury, and is not displaced from a foraging area</i>'. Acoustic modelling and ANIMAT modelling have demonstrated that TTS effects will not occur in the pygmy blue whale migration BIA and sound levels will not result in displacement from foraging areas.</p> <p>The impact assessment and proposed control measures are consistent with NOPSEMA Acoustic Impact Evaluation and Management Guideline (N-04750-IP1765 Rev2 Dec 2018).</p> <p>No significant or long-term impacts are expected to occur to key habitats of EPBC Act listed species included as values of the Montebello and Gascoyne AMPs.</p>
Migratory and threatened marine turtles	<p>Principles of ESD</p> <p>The Petroleum Activities Program is consistent with the relevant principles of ESD:</p> <ul style="list-style-type: none"> • The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making. • Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. <p>Impacts are considered consistent with these principles given controls adopted and that impacts will be inherently limited to 'Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes' (Section 2.6.4).</p> <p>Other principles of ESD were considered not relevant given underwater noise emissions from the seismic source do not represent a threat of "serious or irreversible environmental damage", they will not result in impacts that affect the maintenance or enhancement of the "health, diversity and productivity of the environment" over generational timeframes, and they have no relevance to "improved valuation, pricing and incentive mechanisms."</p> <p>Internal Context</p>
	<p>Statement of Acceptability</p> <p>To manage impacts to migratory and threatened cetaceans to an acceptable level, the following EPOs have been applied:</p> <p>EPO 3: Far-field source levels for the selected seismic source for the Scarborough 4D B1 MSS are consistent with levels assessed in this EP.</p> <p>EPO 4: Undertake seismic acquisition in a manner that prevents injury to whales, and minimises the potential for biologically significant behavioural disturbance.</p> <p>EPO 5: Limit underwater sound production from the seismic source to the area defined and assessed in this EP.</p> <p>EPO 6: Undertake seismic acquisition in a manner that reduces potential cumulative impacts resulting from the Petroleum Activities Programme and other seismic survey operations as far as reasonably practicable.</p> <p>The predicted level of impact for migratory and threatened marine turtles is considered to be of an acceptable level given that the:</p> <ul style="list-style-type: none"> • the Petroleum Activities Program is consistent with the relevant principles of ESD • the proposed controls have considered the environmental consequence and are consistent with Woodside's internal policies, procedures and standards • feedback from stakeholders has been taken into consideration • impacts and risks to cultural values have been taken into consideration • legislative requirements/industry standards have been adopted • the Petroleum Activities Program will be undertaken in a manner that prevents displacement of marine turtles

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Demonstration of Acceptability	
Receptor	Statement of Acceptability
<p>Acceptability Criteria and Assessment</p> <p>The Petroleum Activities Program is consistent with Woodside corporate policies, culture, processes, standards, structure and systems as outlined in the Demonstration of ALARP and Environmental Performance Outcomes, including:</p> <ul style="list-style-type: none"> • Woodside Environment and Biodiversity Policy (Appendix A) • Woodside Risk Management Policy (Appendix A). <p>External Context</p> <p>During stakeholder consultation with relevant persons no specifically relating to turtles were raised.</p> <p>Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1</p> <p>Other requirements</p> <p>The proposed control measures are not inconsistent with the applicable objectives and actions of the Recovery Plan for Marine Turtles (DoEE, 2017a). Specifically, controls measures will <i>'manage anthropogenic activities to ensure marine turtles are not displaced from identified habitat critical to the survival of marine turtles and given that the impacts of noise are unknown, a precautionary approach [will] be applied to seismic work, such that surveys planned to occur inside important intermingling habitat should be scheduled outside the nesting season'</i>. Received noise levels from seismic acquisition are not likely to cause injury impacts, displace any individuals from Habitat Critical or intermingling BIAs, or result in any ecologically significant impacts at a population level for any species of marine turtle that may be present within or adjacent to the Operational Area during the Petroleum Activities Program.</p> <p>The impact assessment and proposed control measures are consistent with NOPSEMA Acoustic Impact Evaluation and Management Guideline (N-04750-IP1765 Rev2 Dec 2018).</p> <p>Nesting and intermingling marine turtle habitats are identified as a natural value of the Montebello and Gascoyne AMP's. No significant impacts to intermingling marine turtles are predicted and the Activity will be undertaken consistent with marine park objectives.</p>	<p>Principles of ESD</p> <p>The Petroleum Activities Program is consistent with the relevant principles of ESD:</p>
<p>Principles of ESD</p> <p>The Petroleum Activities Program is consistent with the relevant principles of ESD:</p>	<p>The predicted level of impact for migratory and threatened fishes and elasmobranchs (including whale sharks) is considered to be of an acceptable level given that the:</p>

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Demonstration of Acceptability	
Receptor	Acceptability Criteria and Assessment
<p>(including whale sharks)</p>	<p>The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making.</p> <ul style="list-style-type: none"> Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. <p>Impacts are considered consistent with these principles given controls adopted and that impacts will be inherently limited to localised impacts with no lasting effect (Section 2.6.4).</p> <p>Other principles of ESD were considered not relevant given underwater noise emissions from the seismic source do not represent a threat of "serious or irreversible environmental damage", they will not result in impacts that affect the maintenance or enhancement of the "health, diversity and productivity of the environment" over generational timeframes, and they have no relevance to "improved valuation, pricing and incentive mechanisms."</p> <p>Internal Context</p> <p>The Petroleum Activities Program is consistent with Woodside corporate policies, culture, processes, standards, structure and systems as outlined in the Demonstration of ALARP and Environmental Performance Outcomes, including:</p> <ul style="list-style-type: none"> Woodside Environment and Biodiversity Policy (Appendix A) Woodside Risk Management Policy (Appendix A). <p>External Context</p> <p>During stakeholder consultation with relevant stakeholders no concerns specifically relating to fish were raised.</p> <p>Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1</p> <p>Other Requirements</p> <p>There are no legislative requirements applicable to managing the effects of seismic surveys in relation to sharks.</p> <p>Seismic noise has not been identified as a threat to whale sharks (or other shark species identified as possibly present in the region) in recovery plans or wildlife conservation plans/advice.</p> <p>Noise pollution is not identified as a pressure to whale sharks in the Marine Bioregional Plan for the NWMR (DSEWPac, 2012a).</p>
Statement of Acceptability	<ul style="list-style-type: none"> the Petroleum Activities Program is consistent with the relevant principles of ESD the proposed controls have considered the environmental consequence and are consistent with Woodside's internal policies, procedures and standards feedback from stakeholders has been taken into consideration impacts and risks to cultural values have been taken into consideration legislative requirements/industry standards have been adopted the Petroleum Activities Program will not result in physical injury to migratory and threatened fishes and elasmobranchs (including whale sharks) the Petroleum Activities Program will be managed in a manner that is consistent with management objectives for relevant WHAs, AMPs, recovery plans and conservation plans/advice the predicted level of impact has been reduced to ALARP. <p>Environmental Performance Considerations</p> <p>The Petroleum Activities Program will not result in physical injury to migratory and threatened fishes and elasmobranchs (including whale sharks).</p> <p>The following EPOs have been applied:</p> <p>EPO 3: Far-field source levels for the selected seismic source for the Scarborough 4D B1 MSS are consistent with levels assessed in this EP.</p> <p>EPO 5: Limit underwater sound production from the seismic source to the area defined and assessed in this EP.</p>

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Demonstration of Acceptability	
Receptor	Acceptability Criteria and Assessment
<p>Fish spawning and commercial fisheries</p>	<p>The impact assessment and proposed control measures are consistent with NOPSEMA Acoustic Impact Evaluation and Management Guideline (N-04750-IP1765 Rev2 Dec 2018).</p> <p>Principles of ESD The Petroleum Activities Program is consistent with the relevant principles of ESD:</p> <ul style="list-style-type: none"> • The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making. • Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. <p>Impacts are considered consistent with these principles given controls adopted and that impacts will be inherently limited to 'Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes' (Section 2.6.4).</p> <p>Other principles of ESD were considered not relevant given underwater noise emissions from the seismic source do not represent a threat of "serious or irreversible environmental damage", they will not result in impacts that affect the maintenance or enhancement of the "health, diversity and productivity of the environment" over generational timeframes, and they have no relevance to "improved valuation, pricing and incentive mechanisms."</p> <p>Internal Context The Petroleum Activities Program is consistent with Woodside corporate policies, culture, processes, standards, structure and systems as outlined in the Demonstration of ALARP and Environmental Performance Outcomes, including:</p> <ul style="list-style-type: none"> • Woodside Environment and Biodiversity Policy (Appendix A) • Woodside Risk Management Policy (Appendix A). <p>External Context During stakeholder consultation with relevant persons no concerns specifically relating to fish spawning or commercial fisheries were raised.</p> <p>Potential impacts to fish spawning have been considered in this EP through review of overlap of behavioural response zones for fish and potential spawning areas, and demonstration that impacts and risks will be managed to levels that are ALARP. The potential impacts of noise emissions from the seismic source on spawning of key indicator commercial fish species are considered to be slight and short-term, and the</p>
	<p>Statement of Acceptability</p> <p>The predicted level of impact for fish spawning and commercial fisheries is considered to be of an acceptable level given that the:</p> <ul style="list-style-type: none"> • the Petroleum Activities Program is consistent with the relevant principles of ESD • the proposed controls have considered the environmental consequence and are consistent with Woodside's internal policies, procedures and standards • feedback from stakeholders has been taken into consideration • impacts and risks to cultural values have been taken into consideration • legislative requirements/industry standards have been adopted • the Petroleum Activities Program will not result in changes to the spawning biomass or changes in recruitment of commercially important species that may be discernible from normal natural variation • the Petroleum Activities Program will not impact commercial fishery catch rates • the predicted level of impact has been reduced to ALARP. <p>Environmental Performance Considerations The Petroleum Activities Program will not result in changes to the spawning biomass or changes in recruitment of commercially important species that may be discernible from normal natural variation. The Petroleum Activities Program will not impact commercial fishery catch rates.</p> <p>The following EPOs have been applied:</p>

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Demonstration of Acceptability	
Receptor	Statement of Acceptability
<p style="text-align: center;">Acceptability Criteria and Assessment</p> <p>Activity is not likely to result in any ecologically significant impacts at a population level for any key indicator commercial fish species that may be spawning within or adjacent to the Operational Area during acquisition activities. Similarly, the potential impacts on commercial catch rates are considered to be slight, as the activity is not likely to result in any ecologically significant impacts at a population level for any key indicator species and the Petroleum Activities Program is not located in an area targeted by commercial fisheries.</p> <p>Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1</p> <p>Other Requirements</p> <p>There are no legislative requirements applicable to managing the effects of seismic surveys in relation to fish spawning and commercial fisheries.</p> <p>The proposed control measures are consistent with key mitigation strategies for seismic surveys published in the WA Department of Fisheries Guidance statement on undertaking seismic surveys in Western Australian waters (DoF, 2013) – e.g. use of soft starts; minimise the sound intensity and exposure time of surveys.</p> <p>Woodside has also considered DPIRD's ecological risk assessment of seismic impacts to marine finfish and invertebrates (Webster et al., 2018) during the assessment of impacts and risks to fish spawning and commercial fisheries, noting that the DPIRD risk assessment considers worst-case potential impacts to individual finfish and invertebrates assuming they do not move to avoid an approaching seismic source. This is not representative of real-life sound exposures and does not represent impacts at a population level. Woodside has, therefore, considered additional information to assess impacts to fish spawning and fish stock populations.</p> <p>The impact assessment and proposed control measures are consistent with NOPSEMA Acoustic Impact Evaluation and Management Guideline (N-04750-IP1765 Rev2 Dec 2018).</p>	<p>EPO 3: Far-field source levels for the selected seismic source for the Scarborough 4D B1 MSS are consistent with levels assessed in this EP.</p> <p>EPO 5: Limit underwater sound production from the seismic source to the area defined and assessed in this EP.</p>
<p>Principles of ESD</p> <p>The Petroleum Activities Program is consistent with the relevant principles of ESD:</p> <ul style="list-style-type: none"> • The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making. • Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. 	<p>The predicted level of impact for AMPs is considered to be of an acceptable level given that the:</p> <ul style="list-style-type: none"> • the Petroleum Activities Program is consistent with the relevant principles of ESD • the proposed controls have considered the environmental consequence and are consistent with

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Demonstration of Acceptability		
Receptor	Acceptability Criteria and Assessment	Statement of Acceptability
Other environmental values (ecosystems/habitats, species and socio-economic)	<p>Impacts are considered consistent with these principles given controls adopted and that impacts will be inherently limited to 'Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes' (Section 2.6.4).</p> <p>Other principles of ESD were considered not relevant given underwater noise emissions from the seismic source do not represent a threat of "serious or irreversible environmental damage", they will not result in impacts that affect the maintenance or enhancement of the "health, diversity and productivity of the environment" over generational timeframes, and they have no relevance to "improved valuation, pricing and incentive mechanisms".</p> <p>Internal Context</p> <p>The Petroleum Activities Program is consistent with Woodside corporate policies, culture, processes, standards, structure and systems as outlined in the Demonstration of ALARP and Environmental Performance Outcomes, including:</p> <ul style="list-style-type: none"> Woodside Environment and Biodiversity Policy (Appendix A) Woodside Risk Management Policy (Appendix A). <p>External Context</p> <p>N/A</p> <p>Other Requirements</p> <p>The proposed controls and consequence/residual risk level are consistent with:</p> <ul style="list-style-type: none"> Australian IUCN Reserve Management Principles and objectives of the IUCN Category VI Zone, as outlined in the North-west Marine Parks Network Management Plan (DNP, 2018a) the zone management categories outlined in the North-west Marine Parks Network Management Plan and values of the Montebello and Gascoyne AMPs. 	<p>Woodside's internal policies, procedures and standards</p> <ul style="list-style-type: none"> feedback from stakeholders has been taken into consideration legislative requirements/industry standards have been adopted the Petroleum Activities Program will not be inconsistent with the principles or management objectives of the North-west Marine Parks Network Management Plan (DNP, 2018a) the Petroleum Activities Program will be undertaken in a manner that is consistent with the zone management categories outlined in the North-west Marine Parks Network Management Plan and values of the Montebello and Gascoyne AMPs the predicted level of impact has been reduced to ALARP. <p>Environmental Performance Considerations</p> <p>The Petroleum Activities Program will not impact the values or management objectives of AMPs or the North-west Marine Park Network.</p> <p>The following EPOs have been applied:</p> <p>EPO 3: Far-field source levels for the selected seismic source for the Scarborough 4D B1 MSS are consistent with levels assessed in this EP.</p> <p>EPO 5: Limit underwater sound production from the seismic source to the area defined and assessed in this EP.</p>
	<p>Principles of ESD</p> <p>The Petroleum Activities Program is consistent with the relevant principles of ESD:</p> <ul style="list-style-type: none"> The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making. 	<p>The predicted level of impact is considered to be of an acceptable level given that the:</p> <ul style="list-style-type: none"> the Petroleum Activities Program is consistent with the relevant principles of ESD

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Demonstration of Acceptability	
Receptor	Statement of Acceptability
<p style="text-align: center;">Acceptability Criteria and Assessment</p> <ul style="list-style-type: none"> Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. Impacts are considered consistent with these principles given controls adopted and that impacts will be inherently limited to ‘Slight, short-term impact (less than one year) on species, habitat (but not affecting ecosystems function), physical or biological attributes’ (Section 2.6.4). Other principles of ESD were considered not relevant given underwater noise emissions from the seismic source do not represent a threat of “serious or irreversible environmental damage”, they will not result in impacts that affect the maintenance or enhancement of the “health, diversity and productivity of the environment” over generational timeframes, and they have no relevance to “improved valuation, pricing and incentive mechanisms.” <p>Internal Context</p> <p>The Petroleum Activities Program is consistent with Woodside corporate policies, culture, processes, standards, structure and systems as outlined in the Demonstration of ALARP and Environmental Performance Outcomes, including:</p> <ul style="list-style-type: none"> Woodside Environment and Biodiversity Policy (Appendix A) Woodside Risk Management Policy (Appendix A). <p>External Context</p> <p>Impacts to zooplankton was raised during consultation (Section 5) and this feedback was considered in the finalisation of the EP.</p> <p>Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1</p> <p>Other Requirements</p> <p>No additional legislative requirements applicable to managing the effects of seismic surveys in relation to other identified environment values have been identified.</p>	<ul style="list-style-type: none"> the proposed controls have considered the environmental consequence and are consistent with Woodside’s internal policies, procedures and standards feedback from stakeholders has been taken into consideration impacts and risks to cultural values have been taken into consideration legislative requirements/industry standards have been adopted the Petroleum Activities Program will be managed in a manner that prevents any long term impacts to ecosystems/habitats, species and socio-economic values the Petroleum Activities Program will be managed in a manner that is consistent with management objectives for relevant WHPs, AMPs, recovery plans and conservation plans/advice the predicted level of impact has been reduced to ALARP. <p>Environmental Performance Considerations</p> <p>The Petroleum Activities Program will not result in long term impacts to ecosystems/habitats, species and socio-economic values.</p> <p>The following EPOs have been applied:</p> <p>EPO 3: Far-field source levels for the selected seismic source for the Scarborough 4D B1 MSS are consistent with levels assessed in this EP.</p> <p>EPO 5: Limit underwater sound production from the seismic source to the area defined and assessed in this EP.</p>

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
<p>EPO 3</p> <p>Far-field source levels for the selected seismic source for the Scarborough 4D B1 MSS are consistent with levels assessed in this EP.</p>	<p>C 3.1</p> <p>Seismic source validation.</p>	<p>PS 3.1</p> <p>In the event that a seismic source is selected for the Scarborough 4D B1 MSS that is significantly different to the modelled source⁶, additional acoustic source modelling will be undertaken using the JASCO AASM model to confirm that the far-field horizontal source level specifications of the seismic source selected for the Scarborough 4D B1 MSS are comparable to those assessed in this EP.</p>	<p>MC 3.1.1</p> <p>Acoustic source modelling report for selected seismic source</p>
<p>EPO 4</p> <p>Undertake seismic acquisition in a manner that prevents injury to whales, and minimises the potential for biologically significant behavioural disturbance</p>	<p>C 4.1</p> <p>Application of EPBC Policy Statement 2.1 Part A Standard Management Procedures and Part B.4 to whales, as outlined below:</p> <ul style="list-style-type: none"> • observation zone: 3 km+ to the limits of visibility for large unidentified whales 2 km to 3 km for all other whales • shut-down zone: to limits of visibility for positively identified (certain or probable confidence level) pygmy blue whales or large unidentified whales; 2 km for all whales • observation and compliance reporting: Use of vessel crew to supplement dedicated MFOs in marine fauna observations and monitoring compliance to Policy Statement 2.1. Records kept of marine fauna observations during all surveys. • pre start-up visual observation (30 minutes) • soft start procedure (30 minutes) • start-up delay procedure (if sighting occurs) • operations procedure 	<p>PS 4.1</p> <p>EPBC Policy Statement 2.1 – Part A Standard Management Procedures and Part B.4 as outlined below:</p> <ul style="list-style-type: none"> • observation zone: 3 km+ to the limits of visibility for large unidentified whales 2 km to 3 km for all other whales • shut-down zone: to limits of visibility for positively identified (certain or probable confidence level) pygmy blue whales or large unidentified whales 2 km for all whales • observation and compliance reporting: Use of vessel crew to supplement dedicated MFOs in marine fauna observations and monitoring compliance to Policy Statement 2.1. Records kept of marine fauna observations during all surveys. • pre start-up visual observation (30 minutes) • soft start procedure (30 minutes) • start-up delay procedure (if sighting occurs) • operations procedure 	<p>MC 4.1.1</p> <p>Records demonstrate compliance with Policy Statement 2.1 Part A Standard Management Procedures and Part B.4.</p>

⁶ “Significantly different” is defined as a difference of 3 dB or greater than the modelled peak source pressure levels in the broadside, endfire and vertical directions (see Table 9 in Koessler et al., 2021; **Appendix G**), as determined by seismic contractor in-house modelling of their proposed array (e.g. Gundalf, Nucleus+ outputs).

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	<ul style="list-style-type: none"> stop work procedure night-time and low visibility procedure. 	<ul style="list-style-type: none"> stop work procedure night-time and low visibility procedure. 	
	<p>C 4.2 Application of EPBC Policy Statement 2.1 Part B.1 – MFOs: Employ four dedicated MFOs to undertake observations for EPBC Act Policy Statement 2.1.</p>	<p>PS 4.2.1 Two dedicated MFOs per observing vessel (survey vessel and spotter vessel) will be employed to undertake observations for EPBC Act Policy Statement 2.1.</p>	<p>MC 4.2.1 Records demonstrate two dedicated MFOs per observing vessel (survey vessel and spotter vessel) are on board and undertake observations in accordance with EPBC Act Policy Statement 2.1.</p>
		<p>PS 4.2.2 All MFOs engaged for the Petroleum Activities Program will have, previous experience complete relevant training detailing marine fauna identification and EPBC Act Policy Statement 2.1 requirements.</p>	<p>MC 4.2.2 Records demonstrate that all MFOs engaged for the Petroleum Activities Program have previous experience, received training in marine fauna identification and EPBC Act Policy Statement 2.1 requirements.</p>
		<p>PS 4.2.2 At least one dedicated MFO undertaking observations during daylight hours per observing vessel (survey vessel and spotter vessel). If required additional MFO will be used during times of increased whale sightings.</p>	<p>MC 4.2.2 Log book demonstrates at least one MFO was on duty during daylight hours per observing vessel (survey vessel and spotter vessel) and additional observation effort initiated as required.</p>
	<p>C 4.3 Application of EPBC Policy Statement 2.1 Part B.5 – PAM:</p> <ul style="list-style-type: none"> A PAM system will be installed aboard the survey vessel to detect odontocete whales (specifically sperm and beaked whales) Employ two dedicated PAM operators wherever possible. 	<p>PS 4.3.1 EPBC Policy Statement 2.1 Part B.5 – PAM.</p> <ul style="list-style-type: none"> PAM observations are undertaken on a 24-hour basis by two competent and experienced PAM Operators trained in the PAM system software used. During daylight hours, PAM detections will be validated against MFO observations and ranges to determine the error (if any) in PAM detection distances. At night and during periods of low visibility PAM will be used to trigger: shutdown for any sperm and beaked whales detected in the 2 km shutdown zone. 	<p>MC 4.3.1 Records demonstrate that an operational PAM system is aboard the survey vessel.</p> <p>Calibration records of PAM detections and visual observations during daylight hours.</p> <p>PAM Master Observation Sheet provides acoustic detection record for the surveys.</p> <p>Records (CV) verify the PAM Operators are competent to a standard equivalent to those in the International Association of Geophysical Contractors (IAGC) Guidance on the Use of Towed Passive Acoustic Monitoring during Geophysical Operations (IAGC, 2014).</p>

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
		<p>PS 4.3.2</p> <p>If the PAM system has malfunctioned or become damaged during daylight/periods of good visibility, operations may continue for 20 minutes without PAM while the PAM operator diagnoses the issue. If the diagnosis indicates that the PAM equipment must be repaired to solve the problem, operations may continue for an additional 2-hours without PAM monitoring as long as all of the following conditions are met:</p> <ul style="list-style-type: none"> • The PAM operator believes it can be repaired within this period • It is a period of good visibility • No marine mammals were detected solely by PAM in the relevant mitigation zones in the previous 2-hours • Two MFOs maintain watch at all times during operations when PAM is not operational • The time and location of all operations without an active PAM system are documented. <p>Operations with an active source, but without an active PAM system, do not exceed a cumulative total of 4-hours in any 24-hour period. If the PAM system becomes non-operational at night or during periods of low visibility the seismic source will be shut down and acquisition will cease until such time as the system can be restored.</p>	<p>MC 4.3.2</p> <p>Records demonstrate that operations with an active source, but without an active PAM system do not exceed a cumulative total of 4 hours in any 24-hour period.</p>
	<p>C 4.4</p> <p>Adaptive Management Measures to minimise the minimum potential impacts to pygmy blue whales from seismic noise. The following adaptive management</p>	<p>PS 4.4</p> <p>Adaptive Management Measures to minimise the minimum potential impacts to pygmy blue whales from seismic noise. The following adaptive management</p>	<p>MC 4.4.1</p> <p>Records demonstrate compliance with pygmy blue whale adaptive management measures as described.</p>

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	<p>measures procedures will be implemented:</p> <ul style="list-style-type: none"> If there are three or more shut-downs for pygmy blue whales within a 24-hour period (including spotter vessel MFO shutdowns), then the seismic operations must not be undertaken thereafter at night-time or during low visibility conditions. Seismic operations cannot resume at night-time or during low visibility conditions, until there has been a cumulative 24-hour period of seismic operations (daylight hours with good visibility) during which there has been less than three shut-downs for pygmy blue whales. 	<p>measures procedures will be implemented:</p> <ul style="list-style-type: none"> If there are three or more shut-downs for pygmy blue whales within a 24-hour period (including spotter vessel MFO shutdowns), then the seismic operations must not be undertaken thereafter at night-time or during low visibility conditions. Seismic operations cannot resume at night-time or during low visibility conditions, until there has been a cumulative 24-hour period of seismic operations (daylight hours with good visibility) during which there has been less than three shut-downs for pygmy blue whales. 	
	<p>C 4.5</p> <p>No operation of the seismic source within 25 km of the pygmy blue whale migration BIA.</p>	<p>PS 4.5</p> <p>No operation of the seismic source within 25 km of the pygmy blue whale migration BIA.</p>	<p>MC 4.5.1</p> <p>Records demonstrate compliance with the 25 km buffer from the migration BIA.</p>
	<p>C 4.6</p> <p>EPBC Act Policy Statement 2.1 Part B.3 – Use of additional vessels to detect presence of cetaceans, during all daylight activities with seismic source discharge activities. pygmy blue whale northbound migration (May and June):</p> <ul style="list-style-type: none"> Use of two MFOs aboard a dedicated spotter vessel travelling ~5 km out ahead of the seismic vessel and acoustic array to implement C 4.1. 	<p>PS 4.6</p> <p>Use of two MFOs aboard a dedicated spotter vessel ahead of the seismic vessel to implement C 4.1.</p>	<p>MC 4.6.1</p> <p>Records demonstrate the use of two MFOs aboard a dedicated spotter vessel.</p>
			<p>MC 4.1.1 refer to above.</p>
<p>EPO 5</p> <p>Limit underwater sound production from the seismic source to the area defined and assessed in this EP.</p>	<p>C 5.1</p> <p>No operation of the seismic source outside of the Active Source Area.</p>	<p>PS 5.1</p> <p>No operation of the seismic source outside of the Active Source Area.</p>	<p>MC 5.1.1</p> <p>Records demonstrate compliance with seismic source operation exclusively within the Active Source Area.</p>
<p>EPO 6</p>	<p>C 6.1</p>	<p>PS 6.1</p>	<p>MC 6.1.1</p>

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
Undertake seismic acquisition in a manner that reduces potential cumulative impacts resulting from the Petroleum Activities Programme and other seismic survey operations as far as reasonably practicable.	A 40 km separation distance between the Petroleum Activities Program and any identified concurrent seismic survey	A 40 km separation distance between the Petroleum Activities Program and any identified concurrent seismic survey	Records demonstrate compliance with the 40 km separation distance. Records demonstrate consultation with other seismic companies of seismic surveys and titleholders with acreage within 40 km of the Operational Area prior to commencement of the activity.

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6.6.3 Routine Acoustic Emissions: Project Vessels

Context														
Project Vessels – Section 3.5.5				Physical Environment – Section 4.4 Biological Environment – Section 4.5				Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Generation of noise from project vessels and mechanical equipment during normal operations (excluding seismic survey equipment).						X		A	F	-	-	LC S GP	Broadly acceptable	EPO 7
Description of Source of Impact														
<p>During the Petroleum Activities Program, both atmospheric and underwater noise will be generated from the project vessels (seismic vessel support vessel chase vessel and spotter vessel) and associated mechanical equipment during normal operations.</p> <p>Project Vessels</p> <p>Project vessels will generate noise, due to the operation of thruster engines, propeller cavitation, on-board machinery etc. These noises will contribute to and have the potential to exceed ambient noise levels which range from around 90 dB re 1 µPa (root square mean sound pressure level [SPL]) under very calm, low wind conditions, to 120 dB re 1µPa (SPL) under windy conditions (McCauley, 2005).</p> <p>The sound level and frequency characteristics ('signature') of discernible ships depend on their size, number of propellers, number and type of propeller blades, blade biofouling condition and machinery/transmission maintenance condition. In general, the larger the ship the louder the source level and the lower its frequency. A typical support vessel's peak frequency or band ranges from 1–500 Hz at a peak source level of 170-190 dB re 1 µPa at 1 m. It is expected that similar noise levels will be generated by vessels used for this Petroleum Activities Program.</p>														
Impact Assessment														
Potential Impacts to Environmental Values														
<p>Receptors</p> <p>The Operational Area is located in water depths ranging from about 800 m to 1150 m. The fauna associated with this area will be predominantly pelagic fish species, with the potential for the transient presence of other species such as cetaceans, turtles and whale sharks (refer to Section 4).</p> <p>Based on the information presented in Section 4.6.3, there are no BIAs for cetaceans identified within the Operational Area; however, a pygmy blue whale migration and foraging BIAs are located 14 km south-east and 154 km south of the Operational Area, respectively. The Operational Area overlaps the pygmy blue whale distribution range and includes the recorded presence of an individual (Thums et al. 2022). The pygmy blue whale may be encountered within the Operational Area during their northbound migration from April to July, and southbound migration from October to January; however the likelihood of encountering migrating or foraging pygmy blue whales is considered low.</p> <p>As described in Section 4.6.3.1, there is the possibility that some migrating northbound pygmy blue whales may also be opportunistically foraging to the west of the migration BIA (during the peak period of northbound migration), as indicated by the track of one northbound individual animal tagged off North West Cape in early June 2020 (in Figure</p>														

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4-7). This represents <5% of total number of tagged whales (refer to Thums et al. (2022)). As shown in **Figure 4-7**, the track of this one individual partially overlapped the eastern edge of the Operational Area and the south-east corner of the Active Source Area, with recorded presence as shown by the satellite track in June 2020 (peak northbound migration). Acoustic and telemetry data indicate faster migration speeds for the southbound migration compared to the northbound migration and no evidence of foraging by southbound pygmy blue whales within the Operational Area.

There are no marine turtle BIAs within the Operational Area or EMBA, however interesting buffer BIAs for the flatback, green and hawksbill turtles are located just outside of the EMBA. There is one habitat critical area for flatback turtles that overlaps the EMBA (147 km south-east of the Operational Area). The nearest interesting buffer for flatback turtles, located approximately 135 km south-east of the Operational Area. The 80 km interesting buffer for flatback turtles in the Recovery Plan for Marine Turtles in Australia (DoEE, 2017a) is considered very conservative, and it is likely that the EMBA represents unsuitable interesting habitat (>25 m water depth and >27 km from the coastline) (Whitlock et al., 2016). The occurrence of all marine turtle species within the Operational Area is expected to be limited to infrequent occurrences of transitory individuals.

The Operational Area does not represent important habitat for whale sharks. However, a whale shark foraging BIA is located approximately 136 km south-east of the Operational Area, and therefore due to the species widespread distribution and highly migratory nature, individuals may transit through the Operational Area.

Potential Impact of Noise

As described in **Section 6.6.2**, elevated underwater noise can affect marine fauna, including cetaceans, turtles, fish, sharks and rays in three main ways (Richardson et al., 1995; Simmonds et al., 2004):

- By causing direct physical effects on hearing or other organs. Hearing loss may be temporary (temporary threshold shift [TTS]; referred to as auditory fatigue), or permanent threshold shift (PTS; injury)
- By masking or interfering with other biologically important sounds (including vocal communication, echolocation, signals and sounds produced by predators or prey)
- Through disturbance leading to behavioural changes or displacement from important areas (e.g. BIAs). The occurrence and intensity of disturbance is highly variable and depends on a range of factors relating to the animal and situation.

The potential impacts associated with noise emissions from the seismic equipment are presented in **Section 6.6.2**, detail on impacts specific to noise from project vessels provided below.

Project Vessels

Noise generated by the project vessels is expected to be up to 190 dB re 1 µPa at 1 m. The potential for received levels to exceed weighted thresholds defined for PTS or TTS for marine mammals is considered not credible due to propagation and reduction of sound from the source. Behavioural response thresholds for marine mammals are estimated to be exceeded out to several kilometres from the project vessels. Currently, there are no quantitative sound exposure thresholds for behavioural responses in marine turtles resulting from continuous noise sources.

Marine fauna associated with the Operational Area will be predominantly pelagic fish species, with the potential for species such as whale sharks, rays, marine turtles and cetacean species to transit through the Operational Area. As outlined above, there are no marine fauna BIAs within the Operational Area. Therefore, potential impacts from vessel noise are likely to be restricted to temporary avoidance behaviour to individuals, and are therefore considered localised with no lasting effect.

Compliance with EPBC Regulation 2000 – Part 8 Interacting with Cetaceans to reduce the likelihood of collisions with cetaceans (i.e., vessels are to travel slower) may also further incidentally reduce the noise generated by vessels close to cetaceans and marine turtles—slower vessel speeds may reduce underwater noise.

In summary, potential impacts from vessel noise are likely to be restricted to temporary avoidance behaviour of individuals transiting through the Operational Area with no lasting effect. Individuals may deviate slightly from their activities, but are expected resume normal behaviours as they move away from the activities.

Summary of Potential Impacts to environmental value(s)

Given the adopted controls, it is considered that noise generated by project vessels will not result in a potential impact greater than a localised, temporary disruption to a small portion of the population for any marine fauna species exposed, with no lasting effects.

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS) ⁷	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
EPBC Regulations 2000 –Part 8 Division 8.1 Interacting with cetaceans including the following measures: <ul style="list-style-type: none"> Project vessels will not travel greater than six knots within 300 m of a cetacean or turtle (caution zone) Project vessels will not approach closer than 50 m for a dolphin or turtle and/or 100 m for a whale (with the exception of animals bow riding). If the cetacean or turtle shows signs of being disturbed, project vessels will immediately withdraw from the caution zone at a constant speed of less than 6 knots. Vessels will not travel greater than eight knots within 250 m of a whale shark and not allow the vessel to approach closer than 30 m of a whale shark. <p>Exception: The above requirement does not apply to project vessels operating under limited/constrained manoeuvrability including but not limited to seismic vessel towing equipment and acquiring data, and in the event of an emergency</p>	F: Yes CS: Minimal reduction in vessel speed and manoeuvrability resulting in minimal delay	By managing the interactions with cetaceans and restricting the proximity between vessels and cetaceans, impacts from vessel-generated noise are reduced.	Control is a legislative requirement – must be adopted	Yes C 7.1
Good Practice				
None identified.				

⁷ Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁷	Benefit/Reduction in Impact	Proportionality	Control Adopted
Professional Judgement – Eliminate				
Eliminate use of vessels.	F: No. The use of vessels is required to conduct the Petroleum Activities Program. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Conduct the Petroleum Activities Program away from sensitive receptors	F: No. The location of the petroleum activities is determined by the predicted location of hydrocarbons and the legislative requirement to explore for hydrocarbons CS: Requirement to conduct activity.	Not considered – control not feasible.	Not considered – control not feasible.	No
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				
ALARP Statement				
On the basis of the environmental impact assessment outcomes and use of the relevant tools appropriate to the decision type (i.e., Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts and risks of project vessel noise emissions. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The impact assessment has determined that, given the adopted controls, project vessel noise disturbance are unlikely to result in a potential impact greater than localised and temporary disruption to a small proportion of the population, with no lasting effects, and no impact on critical habitat or activity. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice and meet the requirements of Part 8 (Division 8.1) of the EPBC Regulations 2000. The Activity is not inconsistent with Recovery or Threat Abatement Plans (Section 6.9.3), including the BWCMP (Table 6-21) . The potential impacts and risks are considered broadly acceptable if the adopted controls are implemented. Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1 . Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks of vessel noise emissions to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
<p>EPO 7</p> <p>Minimise impacts of noise generated from the Petroleum Activities Program on threatened and migratory cetacean species listed under the EPBC Act in the Operational Areas</p>	<p>C 7.1</p> <p>EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans including the following measures:</p> <ul style="list-style-type: none"> Project vessels will not travel greater than 6 knots within 300 m of a cetacean or turtle (caution zone) Project vessels will not approach closer than 50 m for a dolphin or turtle and/or 100 m for a whale (with the exception of animals bow riding). If the cetacean or turtle shows signs of being disturbed, project vessels will immediately withdraw from the caution zone at a constant speed of less than 6 knots. Vessels will not travel greater than 8 knots within 250 m of a whale shark and not allow the vessel to approach closer than 30 m of a whale shark. <p>Exception: The above requirement does not apply to project vessels operating under limited/constrained manoeuvrability including but not limited to seismic vessel towing equipment and acquiring data, and in the event of an emergency.</p>	<p>PS 7.1</p> <p>Compliance with EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans, to minimize impacts from underwater noise emissions.</p>	<p>MC 7.1.1</p> <p>Records demonstrate compliance with the EPBC Regulations 2000 (Part 8 Division 8.1).</p>

6.6.4 Routine Atmospheric and GHG Emissions

Context														
Project Vessels – Section 3.5.5 Helicopters – Section 3.5.6				Physical Environment – Section 4.4				Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Exhaust emissions from internal combustion engines and incinerators on project vessels and helicopters within the Operational Area.				X				A	F	-	-	LC	Broadly Acceptable	EPO ₈
Description of Source of Impact														
<p>Atmospheric and greenhouse gas (GHG) emissions will be generated by the project vessels and helicopters from internal combustion engines (including all equipment and generators) and incineration activities (including onboard incinerators) during the Petroleum Activities Program. These have been classified in the following two categories:</p> <p>Atmospheric emissions (non-greenhouse gas emissions) are gases or particles produced from vessels and helicopters, within the Operational Area, which are discharged to the atmosphere and pose a recognised level of adverse effect on flora, fauna and/or human health.</p> <p>GHG emissions refer to gases that trap heat within the atmosphere through the adsorption of longwave radiation reflected from the earth's surface. Considering all vessels included in the activity (including during mobilisation) and potential helicopter travel, the activity is expected to result in GHG emissions of up to 30,000 ktCO_{2e}.</p>														

Impact Assessment
Potential Impacts to Environmental Values
<p>Air Quality</p> <p>Fuel combustion has the potential to result in localised, temporary reduction in air quality. Potential impacts include a localised reduction in air quality and contribution to greenhouse gas emissions. Given the short duration and exposed location of project vessels (which will lead to the rapid dispersion of the low volumes of atmospheric emissions), the potential impacts are expected to be localised and of no lasting effect.</p> <p>Greenhouse Gas Emissions</p> <p>GHG emissions from the Petroleum Activities Program contribute to global concentrations of GHG emissions. It is important to acknowledge that climate change impacts cannot be directly attributed to any one activity, as they are instead the result of global GHG, minus global GHG sinks, that have accumulated in the atmosphere since the industrial revolution.</p> <p>Ecosystems that are particularly susceptible to adverse effects of climate change include alpine habitats, coral reefs, wetlands and coastal ecosystems, polar communities, tropical forests, temperate forests and arid and semi-arid environments (DoEE, 2019). In Australia, this includes coral reefs, alpine regions, rainforests, arid and semi-arid environments, mangroves, grasslands, temperate forests and sclerophyll forests. Future climate change (increased temperature and decreased, but more variable, rainfall) has the potential to have a range of impacts on ecological factors and threaten biodiversity in the Australian Mediterranean ecosystem (CSIRO, 2017).</p>

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Impact Assessment				
Summary of Potential Impacts to Environmental Values(s)				
Given the adopted controls, it is considered that the release of a small volume of atmospheric and greenhouse gas emissions will not result in a potential impact greater than a temporary impact to local air quality with no lasting effect.				
Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁸	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Marine Order 97 (Marine Pollution Prevention – Air Pollution), which details requirements for: <ul style="list-style-type: none"> International Air Pollution Prevention (IAPP) Certificate, required by vessel class use of low sulphur fuel (shall not exceed 0.50% m/m) Ship Energy Efficiency Management Plan, where required by vessel class onboard incinerator to comply with Marine Order 97. 	F: Yes CS: Minimal cost	Legislative requirements to be followed may reduce the consequences of air pollution.	Control based on legislative requirements – must be adopted	Yes C 8.1
Good Practice				
Evaluation of tenders will include consideration of vessel fuel usage / emissions and low carbon / alternative fuels (e.g. LNG)	F: Yes CS: Fuel costs are considered in evaluation of responses, allowing for competitive consideration of low carbon alternatives (e.g. LNG).	Minimises cost and emissions through eco-efficiency approach recognising cost of fuel and carbon emissions for the Petroleum Activities Program	Control effectively allocates a cost to emissions to recognise that vessels with higher fuel consumption / emissions do not represent overall best value.	Yes C 8.2
Professional Judgement – Eliminate				
Do not combust fuel.	F: No. There are no vessels that do not use internal combustion engines. CS: Not considered, control not feasible.	Not considered, control not feasible.	Not considered, control not feasible.	No
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				

⁸ Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁸	Benefit/Reduction in Impact	Proportionality	Control Adopted
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e., Decision Type A), Woodside considers the adopted controls appropriate to manage the potential impacts of release of atmospheric emissions within the Operational Area. As no reasonable additional/alternative controls were identified that would further reduce the impacts without grossly disproportionate sacrifice, the impacts are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The impact assessment has determined that, given the adopted controls, atmospheric emissions during the Petroleum Activities Program will not result in a potential impact greater than a temporary decrease in local air quality with low impact to the environment or human health and no lasting effects. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice. Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1 . Therefore, Woodside considers the adopted controls appropriate to manage the impacts of the described emissions within the Operational Area to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 8 Fuel combustion emissions and incineration during the Petroleum Activities Program will be in compliance with marine order requirements and restrict emissions to those necessary to perform the activity.	C 8.1 Marine Order 97 (Marine Pollution Prevention – Air Pollution) which details requirements for: <ul style="list-style-type: none"> International Air Pollution Prevention (IAPP) Certificate, required by vessel class use of low sulphur fuel (shall not exceed 0.50% m/m) Ship Energy Efficiency Management Plan, where required by vessel class onboard incinerator to comply with Marine Order 97. 	PS 8.1 Project vessels compliant with Marine Order 97 (marine pollution prevention – air pollution) to restrict emissions to those necessary to perform the activity. Vessel marine assurance process implemented, to ensure suitability and compliance with vessel combustion certification / Marine Order requirements.	MC 8.1.1 Records demonstrate compliance with Marine Order 97.
	C 8.2 Evaluation of tenders will include consideration of vessel fuel usage / emissions and low carbon / alternative fuels (e.g., LNG)	PS 8.2 Evaluation of tenders for the Petroleum Activities Program considers of vessel fuel usage / emissions	MC 8.2.1 Records demonstrate that fuel usage / emissions were considered in tender evaluations

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6.6.5 Routine Discharge: Bilge Water, Grey Water, Sewage, Putrescible Wastes and Deck Drainage Water

Context														
Project Vessels – Section 3.5.5			Physical Environment – Section 4.4 Biological Environment – Section 4.5					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Routine discharge of sewage, grey water and putrescible wastes to marine environment from project vessels within the Operational Area			X		X			A	F	-	-	LC S	Broadly acceptable	EPO 9
Routine discharge of deck and bilge water to marine environment from project vessels within the Operational Area			X		X			A	F	-	-			
Description of Source of Impact														
<p>The project vessels routinely generate/discharge:</p> <ul style="list-style-type: none"> • Small volumes of treated sewage, putrescible wastes and grey water to the marine environment (impact assessment based on approximate discharge of 15 m³ per vessel per day), using an average volume of 75 L/person/day and a maximum of 200 persons on board. However, it is noted that these vessels will have considerably less persons on board. • Routine/periodic discharge of relatively small volumes of bilge water. Bilge tanks on the project vessels receive fluids from many parts of the vessel. Bilge water can contain water, oil, detergents, solvents, chemicals, particles and other liquids or solids. • Variable water discharge from project vessel decks directly overboard or via deck drainage systems. Water sources could include rainfall events and/or from deck activities such as cleaning/wash-down of equipment/decks. <p>Routine discharges generated from the Petroleum Activities Program have the potential to cause temporary and localised reduction in water quality.</p> <p>Environmental risk relating to the disposal/discharges above regulated levels or incorrect disposal/discharge of waste would be unplanned (non-routine/accidental) and are addressed in Section 6.7.5.</p>														

Impact Assessment
Potential Impacts to Environmental Values
<p>The main environmental impact associated with ocean disposal of sewage and other organic wastes (i.e. putrescible waste) is eutrophication. Eutrophication occurs when the addition of nutrients, such as nitrates and phosphates, causes adverse changes to the ecosystem, such as oxygen depletion and phytoplankton blooms. Other contaminants of concern occurring in these discharges may include ammonia, <i>E. coli</i>, faecal coliform, volatile and semi-volatile organic compounds, phenol, hydrogen sulphide, metals, surfactants and phthalates.</p> <p>Woodside monitored sewage discharges at its Torosa-4 Appraisal Drilling campaign which demonstrated that a 10 m³ sewage discharge reduced to about 1% of its original concentration within 50 m of the discharge location. In addition</p>

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Impact Assessment
<p>to this, monitoring at distances of 50, 100 and 200 m downstream of the platform and at five different water depths confirmed that discharges were rapidly diluted and no elevations in water quality monitoring parameters (e.g. total nitrogen, total phosphorous and selected metals) were recorded above background levels at any station (Woodside Energy Limited, 2011). Mixing and dispersion would be further facilitated in deep offshore waters, consistent with the location of the Operational Area, through regional wind and large scale current patterns resulting in the rapid mixing of surface and near surface waters where sewage discharges may occur. Studies investigating the effects of nutrient enrichment from offshore sewage discharges indicate that the influence of nutrients in open marine areas is much less significant than that experienced in enclosed areas (McIntyre and Johnston, 1975).</p> <p>Furthermore, open marine waters do not typically support areas of increased ecological sensitivity, due to the lack of nutrients in the upper water column and lack of light penetration at depth. Therefore, presence of receptors such as fish, reptiles, birds and cetaceans, in significant numbers within the Operational Area is unlikely. Research also suggests that zooplankton composition and distribution are not affected in areas associated with sewage dumping grounds (McIntyre and Johnston, 1975). Plankton communities are expected to rapidly recover from any such short-term, localised impact, as they are known to have naturally high levels of mortality and a rapid replacement rate.</p> <p>Other discharges outlined, which may include other non-organic contaminants (e.g. bilge water) will be rapidly diluted through the same mechanisms as above and are expected to be in very small quantities and concentrations as to not pose any significant risk to any relevant receptors.</p> <p>As such, no significant impacts from the planned discharges that are listed above are anticipated because of the minor quantities involved, the expected localised mixing zone and high level of dilution into the open water marine environment of the Operational Area. The Operational Area is more than 12 nm from land, which exceeds the 12 nm exclusion zones required under the relevant Marine Orders.</p>
<p>Summary of Potential Impacts to Environmental Values(s)</p>
<p>Given the adopted controls, it is considered that routine discharges described will not result in a potential impact greater than localised contamination not significant to environmental receptors, with no lasting effect.</p>

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁹	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Marine Orders 95 – pollution prevention – Garbage (as appropriate to vessel class), which requires putrescible waste and food scraps to pass through a macerator so it is capable of passing through a screen with no opening wider than 25 mm.	F: Yes CS: Minimal cost. Standard practice.	No reduction in consequence would result.	Controls based on legislative requirements – must be adopted.	Yes C 9.1
Marine Orders 96 - pollution prevention – sewage (as appropriate to vessel class), specifically: <ul style="list-style-type: none"> • a valid International Sewage Pollution Prevention (ISPP) Certificate, as required by vessel class • an ASMA approved sewage treatment plant • sewage comminuting and disinfecting system • a sewage holding tank sized appropriately to 	F: Yes CS: Minimal cost. Standard practice.	No reduction in consequence would result.	Controls based on legislative requirements – must be adopted.	Yes C 9.2

⁹ Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS) ⁹	Benefit/Reduction in Impact	Proportionality	Control Adopted
<p>contain all generated waste (black and grey water)</p> <ul style="list-style-type: none"> discharge of sewage which is not comminuted or disinfected will only occur at a distance of more than 12 nm from the nearest land discharge of sewage which is comminuted or disinfected using a certified approved sewage treatment plant will only occur at a distance of more than 3 nm from the nearest land discharge of sewage will occur at a moderate rate while the vessel is proceeding (>4 knots), to avoid discharges in environmentally sensitive areas. 				
<p>Marine Orders 91 – oil (as relevant to vessel class) requirements, which include mandatory measures for the processing of oily water prior to discharge:</p> <ul style="list-style-type: none"> machinery space bilge/oily water shall have International Maritime Organisation (IMO) approved oil filtering equipment (oil/water separator) with an on-line monitoring device to measure Oil in Water (OIW) content to be less than 15 ppm prior to discharge IMO approved oil filtering equipment shall also have an alarm and an automatic stopping device or be capable of recirculating in the event that OIW concentration exceeds 15 ppm a deck drainage system shall be capable of controlling the content of discharges for areas of high risk of fuel/oil/grease or 	<p>F: Yes CS: Minimal cost. Standard practice.</p>	<p>No reduction in consequence would result.</p>	<p>Controls based on legislative requirements – must be adopted.</p>	<p>Yes C 9.3</p>

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)⁹	Benefit/Reduction in Impact	Proportionality	Control Adopted
hazardous chemical contamination <ul style="list-style-type: none"> there shall be a waste oil storage tank available, to restrict oil discharges in the event that machinery space bilge discharges cannot meet the oil content standard of <15 ppm without dilution or be treated by an IMO approved oil/water separator, they will be contained on-board and disposed of onshore a valid IOPP Certificate, as required by vessel class. 				
Good Practice				
None identified.				
Professional Judgement – Eliminate				
Storage, transport and treatment/ disposal onshore treatment of sewage, greywater, putrescible and bilge wastes.	F: No. Would present additional safety and hygiene hazards resulting from the storage, loading and transport of the waste material. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				
ALARP Statement				
<p>On the basis of the environmental impact assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts of planned routine discharges from the project vessels. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.</p>				

Demonstration of Acceptability
Acceptability Statement
<p>The impact assessment has determined that, given the adopted controls, planned (routine) discharges from projects vessels are unlikely to result in a potential impact greater than a temporary contamination above background levels and/or national/international quality standards and/or known biological effect concentrations outside a localised mixing zone with no lasting effect. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice and meet legislative requirements under Marine Orders 91, 95 and 96. Activities do not have a significant impact on MNES (Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1.. Therefore,</p>

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Demonstration of Acceptability

Woodside considers the adopted controls appropriate to manage the impacts of these discharges to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria

Outcomes	Controls	Standards	Measurement Criteria
EPO 9 No impact to water quality greater than a consequence level of F ¹⁰ from discharge of sewage, greywater, putrescible wastes, bilge and deck drainage to the marine environment during the Petroleum Activities Program.	C 9.1 Marine Orders 95 – pollution prevention – Garbage (as appropriate to vessel class), which requires putrescible waste and food scraps to pass through a macerator so it is capable of passing through a screen with no opening wider than 25 mm.	PS 9.1 Project vessels compliant with Marine Orders 95 – pollution prevention – Garbage.	MC 9.1.1 Records demonstrate project vessels are compliant with Marine Orders 95 – pollution prevention (as appropriate to vessel class).
	C 9.2 Marine Orders 96 - pollution prevention – sewage (as appropriate to vessel class) specifically: <ul style="list-style-type: none"> • a valid International Sewage Pollution Prevention (ISPP) Certificate, as required by vessel class • an ASMA approved sewage treatment plant • sewage comminuting and disinfecting system • a sewage holding tank sized appropriately to contain all generated waste (black and grey water) • discharge of sewage which is not comminuted or disinfected will only occur at a distance of more than 12 nm from the nearest land • discharge of sewage which is comminuted or disinfected using a certified approved sewage treatment plant will only occur at a distance of more than 3 nm from the nearest land • discharge of sewage will occur at a moderate rate while the vessel is proceeding (>4 knots), to avoid discharges in 	PS 9.2 Project vessels compliant with Marine Order 96 - pollution prevention – sewage (as appropriate to vessel class).	MC 9.2.1 Records demonstrate project vessels are compliant with Marine Orders 96 - pollution prevention – sewage (as appropriate to vessel class).

¹⁰ Defined as 'No lasting effect (<1 month) or negligible impact. Localised impact not significant to environmental receptors.'

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	environmentally sensitive areas.		
	<p>C 9.3 Marine Orders 91 – oil (as relevant to vessel class) requirements, which include mandatory measures for the processing of oily water prior to discharge:</p> <ul style="list-style-type: none"> • machinery space bilge/oily water shall have International Maritime Organisation (IMO) approved oil filtering equipment (oil/water separator) with an on-line monitoring device to measure Oil in Water (OIW) content to be less than 15 ppm prior to discharge • IMO approved oil filtering equipment shall also have an alarm and an automatic stopping device or be capable of recirculating in the event that OIW concentration exceeds 15 ppm • a deck drainage system shall be capable of controlling the content of discharges for areas of high risk of fuel/oil/grease or hazardous chemical contamination • there shall be a waste oil storage tank available, to restrict oil discharges • in the event that machinery space bilge and deck drainage discharges cannot meet the oil content standard of <15 ppm without dilution or be treated by an IMO approved oil/water separator, they will be contained on-board and disposed of onshore • a valid IOPP Certificate, as required by vessel class. 	<p>PS 9.3 Deck drainage and bilge water will be discharged to meet the oil content standard of <15 ppm without dilution</p>	<p>MC 9.3.1 Records demonstrate discharge specification met for project vessels.</p>

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6.6.6 Routine Light Emissions: External Lighting on Project Vessels

Context														
Project Vessels – Section 3.5.5				Physical Environment – Section 4.4 Biological Environment – Section 4.5				Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Routine light emissions from project vessels within the Operational Area.						X		A	F	-	-	LC S GP	Broadly acceptable	N/A
Description of Source of Impact														
<p>Routine light emissions include light sources that alter the ambient light conditions in an environment. Project vessels (including the seismic vessel) will routinely use external lighting to navigate and conduct safe operations at night throughout the Petroleum Activities Program. External light emissions from project vessels are typically managed to maintain good night vision for crew members. Vessel lighting will also be used to communicate the vessel's presence to other marine users (i.e. navigation/warning lights). Lighting is required for safely operating project vessels and cannot reasonably be eliminated.</p> <p>The vessels that may be required for the Petroleum Activities Program in the Operational Area are outlined in Section 3.5.5. External lighting is located on the vessel decks, with most external lighting directed towards working areas such as the main decks. These areas are typically <20 m above sea level.</p> <p>Lighting from vessels may appear as a direct light source from an unshielded lamp with direct line of sight to the observer or through sky glow. Direct lighting falling upon a surface is referred to as light spill. Sky glow is the diffuse glow caused by light that is screened from view, but through reflection and refraction creates a glow in the atmosphere. The distance at which direct light and sky glow may be visible from the source depends on the vessel lighting and environmental conditions.</p>														

Impact Assessment
Potential Impacts to Environmental Values
<p>Receptors that have important habitat within a 20 km radius of the Operational Area were considered for the impact assessment, based on recommendations of the National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds (NLPG). The 20 km threshold provides a precautionary limit based on observed effects of sky glow on marine turtle hatchlings demonstrated to occur at 15–18 km and fledgling seabirds grounded in response to artificial light 15 km away (NLPG, 2020).</p> <p>Light emissions can affect fauna in two main ways:</p> <ul style="list-style-type: none"> • Behaviour: Many species are adapted to natural levels of lighting and the natural changes associated with the day and night cycle as well as the night-time phases of the moon. However, artificial lighting has the potential to create a constant level of light at night that can override these natural levels and cycles. • Orientation: Species such as marine turtles and birds may also use lighting from natural sources to orient themselves in a certain direction at night. If an artificial light source is brighter than a natural source, the artificial light may override natural cues, leading to disorientation.

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Impact Assessment

The fauna within and immediately adjacent to the Operational Area are predominantly pelagic fish and zooplankton, with a low abundance of transient species such as marine turtles, whale sharks, cetaceans and migratory shorebirds and seabirds.

Marine Turtles – Hatchlings

Turtle hatchlings emerge from the nest and orient towards the sea. After entering the water, hatchlings use a combination of cues (wave direction and currents) to orient and travel into offshore waters. Impacts to the sea-finding behaviour of hatchlings are more common for light sources behind a beach, as lighting offshore will orient emerging hatchlings towards the sea. Artificial light at close distances can also impact hatchling dispersal once they are in the water. Light spill may 'entrap' hatchling swimming behaviour, reducing the success of their seaward dispersion and potentially increasing their exposure to predators via silhouetting (Salmon et al., 1992).

Flatback turtle hatchlings do not undertake oceanic migrations offshore to deep, pelagic waters. Instead, juveniles grow to maturity in shallow coastal waters close to their natal beaches (Musick and Limpus, 1996).

The nearest nesting sites in relation to the Operational Area are Barrow Island and the Montebello Islands (over 200 km east of the Operational Area); therefore, sky glow and light spill from project vessels will not reach any nesting beach. Any impacts to hatchling turtles from artificial light will be limited to possible localised behavioural impacts to isolated individual hatchlings offshore, with no lasting effect to the species.

Marine Turtle – Adults

Although individuals undertaking behaviours such as internesting, migration, mating (adults) or foraging (adults and pelagic juveniles) may occur within Operational Area, marine turtles do not use light cues to guide these behaviours. Furthermore, there is no evidence, published or anecdotal, to suggest that internesting, mating, foraging or migrating turtles are impacted by light from offshore vessels. As such, light emissions from the vessels are unlikely to result in displacement of, or behavioural changes to individuals in these life stages (Pendoley Environmental [PENV], 2020).

Artificial lighting may affect the location where nesting adult turtles emerge onto the beach, the success of nest construction, whether nesting is abandoned, and the seaward return of adults (Salmon et al., 1995a, 1995b; Salmon and Witherington, 1995). Such lighting is typically from residential and industrial development at the coastline, rather than offshore from nesting beaches. Barrow Island and the Montebello Islands (over 200 km east of the Operational Area) are known nesting locations, however, light from the project vessels will not be visible as sky glow or light spill to nesting adult turtles. As such, vessel light sources will not discourage females from nesting, or affect nest site selection, and therefore will not displace females from nesting habitat.

There is no emergent habitat within the Operational Area and therefore nesting aggregations of marine turtles would not be expected. There are no BIAs or Habitat Critical to the survival of marine turtles within the Operational Area. The nearest BIAs and Habitat Critical are for flatback turtles are located approximately 135 km south-east and 147 km south-east of the Operational Area, respectively. The 80 km internesting buffer for flatback turtles in the Recovery Plan for Marine Turtles in Australia (DoEE, 2017a) is considered very conservative. There is no evidence to date to indicate that flatback turtles swim out into deep offshore waters during the internesting period. Additionally, suitable areas of internesting habitat were located close to many known flatback turtle rookeries across the region (Whitlock et al., 2016).

The presence of marine turtles in the Operational Area is considered highly unlikely. Light emissions from project vessels are unlikely to result in more than localised behavioural disturbance to isolated transient individuals, with no lasting effect to the species.

Seabirds

Artificial lighting can attract and disorient seabird species resulting in species behavioural changes (e.g. circling light sources or disrupted foraging), injury or mortality near the light source as a result of collision (Longcore and Rich, 2004, Gaston et al., 2014). The Operational Area may be occasionally visited by seabirds; however, there is no emergent land that could be used for roosting or nesting habitat within the Operational Area. The nearest shoreline is Barrow Island (over 200 km east of the Operational Area). In addition, the Operational Area does not overlap with any BIAs or critical habitat for any bird species.

The risk associated with collision from seabirds attracted to the light is considered to be low, given the slow moving speed of project vessels within the Operational Area. Impacts are expected to be limited to temporary behavioural disturbance to isolated individuals, with no lasting effect or displacement from important habitat.

Other Marine Fauna

Lighting from project vessel activities in the Operational Area may result in the localised aggregation of fish around the vessel. These aggregations of fish due to light are considered localised and temporary. Any long-term changes to fish species composition or abundance is considered highly unlikely. Any localised impacts to fish are not expected to impact on any commercial fisheries in the area. Krill or plankton may also aggregate around the source of light. These aggregations of fish, krill or plankton would be confined to a small area. Based on the short duration and localised nature of the Petroleum Activities Program, these aggregations are not expected to attract pygmy blue whales, humpback whales or whale sharks.

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Impact Assessment
Summary of Potential Impacts to Environmental Values(s)
Light emissions from project vessels will not result in an impact greater than a localised and temporary disturbance to marine fauna in the vicinity of the Operational Area with no lasting effect to any species (i.e. Environmental Impact – F).

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS) ¹¹	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
None identified.				
Good Practice				
None identified.				
Professional Judgement – Eliminate				
Restrict the Petroleum Activities Program to daylight hours, eliminating the need for external work lights	F: Yes. Restricting the Petroleum Activities Program to daylight hours is technically feasible, although not considered to be reasonably practicable. CS: Significant cost sacrifice. Limiting the survey to daylight hours would significantly increase the duration of the survey, and therefore result in further potential for interference with other marine users (in particular commercial fisheries).	Negligible reduction in consequence given the duration and nature of the activity.	Grossly disproportionate. Implementation of the control requires considerable cost sacrifice for minimal environmental benefit.	No
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the potential impacts from routine light emissions from project vessels within the Operational Area to be ALARP. This includes consideration of the nature of light emissions for the duration of the Petroleum Activities Program, and the requirements for external lighting for safe operations. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The impact assessment has determined that routine light emissions from project vessels may result in impacts limited to temporary behavioural disturbance to marine fauna within a localised area and with no lasting effect on any species. Further opportunities to reduce the impacts have been investigated above. Regard has been given to relevant conservation advice and wildlife conservation plans during the assessment of potential impacts and the NLPG were taken into consideration during the impact evaluation. Activities do not have a significant impact on MNES

¹¹ Qualitative measure

Demonstration of Acceptability

(Section 2.9.2) including those with an Indigenous connection with, or traditional use in nearshore areas as defined in Section 4.10.1 Therefore, Woodside considers standard operations appropriate to manage the impacts and risks of routine light emissions to a level that is broadly acceptable.

6.7 Unplanned Activities (Accidents, Incidents, Emergency Situations)

6.7.1 Quantitative Spill Risk Assessment Methodology

Quantitative hydrocarbon spill modelling was undertaken by RPS (2019), on behalf of Woodside, using a three-dimensional (3D) hydrocarbon spill trajectory and weathering model, SIMAP (Spill Impact Mapping and Analysis Program), which is designed to simulate the transport, spreading and weathering of specific hydrocarbon types under the influence of changing meteorological and oceanographic forces.

A stochastic modelling scheme was followed in this study, whereby SIMAP was applied to repeatedly simulate the defined credible spill scenarios using different samples of current and wind data. These data samples were selected randomly from an historic time-series of wind and current data representative of the study area. Results of the replicate simulations were then statistically analysed and mapped to define contours of percentage probability of contact at identified thresholds around the hydrocarbon release point.

The model simulates surface releases and uses the unique physical and chemical properties of a hydrocarbon type to calculate rates of evaporation and viscosity change, including the tendency to form oil in water emulsions. Moreover, the unique transport and dispersion of surface slicks and in-water components (entrained and dissolved) are modelled separately. Thus, the model can be used to understand the wider potential consequences of a spill, including direct contact of hydrocarbons due to surface slicks (floating hydrocarbon) and exposure of organisms to entrained and dissolved aromatic hydrocarbons in the water column.

During each simulation, the SIMAP model records the location (by latitude, longitude and depth) of each of the particles (representing a given mass of hydrocarbons) on or in the water column, at regular time steps. For any particles that contact a shoreline, the model records the accumulation of hydrocarbon mass that arrives on each section of shoreline over time, less any mass that is lost to evaporation and/or subsequent removal by current and wind forces.

The collective records from all simulations are then analysed by dividing the study region into a 3D grid. For surface hydrocarbons (floating oil), the sum of the mass in all hydrocarbon particles located within a grid cell, divided by the area of the cell, provides hydrocarbon concentration estimates in that grid cell at each model output time interval. For entrained and dissolved aromatic hydrocarbon particles, concentrations are calculated at each time step by summing the mass of particles within a grid cell and dividing by the volume of the grid cell. The process is also subject to the application of spreading filters that represent the expected mass distribution of each distinct particle. The concentrations of hydrocarbons calculated for each grid cell, at each time step, are then analysed to determine whether concentration estimates exceed defined threshold concentrations.

All hydrocarbon spill modelling assessments undertaken by RPS undergo initial sensitivity modelling to determine appropriate time to add to the simulation after the cessation of the spill. The amount of time following the spill is based on the time required for the modelled concentrations to practically drop below threshold concentrations anywhere in the model domain in the test cases. This assessment is done by post-processing the sensitivity test results and analysing time-series of median and maximum concentrations in the water and on the surface.

6.7.1.1 Hydrocarbon Characteristics

As part of the risk identification process, Woodside identified the range of credible hydrocarbon spill scenarios that may occur from the Petroleum Activities Program. These scenarios are considered in the risk assessments of accidental hydrocarbon spill scenarios (refer to **Section 6.7.2**).

The characteristics of the hydrocarbons, used as the basis for the modelling studies used to inform the assessment, are summarised in **Table 6-13**.

Table 6-13: Hydrocarbon characteristics

Hydrocarbon Type	Initial Density (g/cm ³)	Viscosity (cP)	Component BP (°C)	Volatiles <180 °C	Semi volatiles 180–265 °C	Low Volatility (%) 265–380 °C	Residual (%) >380 °C	Aromatic (%) of whole oil <380 °C BP
				Non-Persistent			Persistent	
Marine diesel	0.829 @ 25 °C	4.0 @ 25 °C	% of total	6.0	34.6	54.4	5.0	3.0
			% aromatics	1.8	1.0	0.2	-	-

6.7.1.2 Environment that May Be Affected and Hydrocarbon Contact Thresholds

The outputs of the quantitative hydrocarbon spill modelling are used to assess the environmental risk if a credible hydrocarbon spill scenario occurred, by delineating which areas of the marine environment could be exposed to hydrocarbon levels exceeding the adopted hydrocarbon threshold concentrations (see **Table 6-14**). The summary of all the locations where hydrocarbon thresholds could be exceeded by any of the simulations modelled is defined as the 'environment that may be affected' (EMBA; **Section 4.1**), which is driven by the worst-case credible hydrocarbon spill scenario. For this Petroleum Activities Program the worst-case credible hydrocarbon spill scenario is a vessel collision resulting in fuel tank rupture (see **Section 6.7.2**).

As the weathering of different fates of hydrocarbons (surface, entrained and dissolved) differs due to the influence of the metocean mechanism of transportation, the EMBA combines the potential spatial extent of the different hydrocarbon fates. Note, no shoreline accumulation of hydrocarbons above threshold concentrations resulted from the modelled worst-case credible spill.

The EMBA covers a larger area than that which will be affected during any single spill event, as the model was run for a variety of weather and metocean conditions (100 simulations in total at one release location). The EMBA therefore represents the total extent of all the locations where the adopted hydrocarbon thresholds could be exceeded from all modelling runs. Given the EMBA comprises the results of many individual simulations, the total area covered at the thresholds has been smoothed to create a continuous boundary for the purpose of describing the environment within it.

A conservative approach for defining thresholds for the EMBA was used by adopting the guideline impact thresholds (NOPSEMA 2019) for floating, entrained, dissolved and accumulated hydrocarbons. An additional threshold has been included to define the boundary within which socio-cultural impacts may occur, based on surface hydrocarbons at 1 g/m² impacting the visual amenity of the marine environment. These hydrocarbon thresholds are presented in **Table 6-14** and described in the following subsections.

Table 6-14: Summary of thresholds applied to the quantitative hydrocarbon spill risk modelling results

Hydrocarbon Type	EMBA				Socio-cultural EMBA	Scientific Monitoring Plan EMBA
	Surface hydrocarbon (g/m ²)	Dissolved hydrocarbon (ppb)	Entrained hydrocarbon (ppb)	Accumulated hydrocarbon (g/m ²)	Surface hydrocarbon (g/m ²)	Accumulated hydrocarbon (g/m ²)
Marine Diesel	10	50	100	100	1	10

Surface Marine Diesel Hydrocarbon Threshold Concentrations

The spill modelling outputs defined the EMBA for surface hydrocarbon spills (contact on surface waters) using the ≥10 g/m² threshold (dull metallic colours) based on the relationship between film thickness and appearance (Bonn Agreement, 2015) (refer to **Table 6-15**). This threshold

concentration, expressed in terms of g/m^2 , is geared towards informing potential oiling impacts for wildlife groups and habitats that may break through the surface slick from the water or the air (e.g. emergent reefs, vegetation in the littoral zone and air-breathing marine reptiles, cetaceans, seabirds and migratory shorebirds).

Thresholds for registering biological impacts resulting from contact of surface slicks have been estimated by different researchers at about $10\text{--}25 \text{ g/m}^2$ (French et al., 1999; Koops et al., 2004; NOAA, 1996; French-McCay, 2018). Potential impacts of surface slick concentrations in this range for floating hydrocarbons may include harm to seabirds through ingestion from preening of contaminated feathers, or the loss of the thermal protection of their feathers. The 10 g/m^2 threshold is the reported level of oiling to instigate impacts to seabirds, and is also applied to other wildlife, although it is recognised that ‘unfurred’ animals (where hydrocarbon adherence is less) may be less vulnerable. ‘Oiling’ at this threshold is taken to be of a magnitude that can cause a response from the most vulnerable wildlife such as seabirds. Due to weathering processes, surface hydrocarbons have a lower toxicity due to changes in their composition over time. Potential impacts to shoreline sensitive receptors may be markedly reduced in instances where there is extended duration until the slick contacts the shoreline.

Woodside recognises that hydrocarbons may be visible at low concentrations of approximately 1 g/m^2 . Therefore, the threshold for visible surface oil (1 g/m^2) was used to define an additional boundary within which socio-cultural impacts to the visual amenity of the marine environment may occur. This area is referred to as the socio-cultural EMBA. Any ecological impacts from dissolved and entrained hydrocarbons above prescribed thresholds, as in **Table 6-14**, may also result in socio-cultural impacts. Potential impacts to socio-cultural values assessed within these EMBA's include the following:

- Protected areas.
- National and Commonwealth Heritage Listed places.
- Tourism and recreation.
- Commercial fisheries.

The boundaries of the two EMBA's may differ due to the different thresholds, hydrodynamics and weathering of the released hydrocarbons.

Table 6-15: The Bonn Agreement oil appearance code

Appearance (following Bonn visibility descriptors)	Mass per area (g/m^2)	Thickness (μm)	Volume per area (L/km^2)
Discontinuous true oil colours	50 to 200	50 to 200	50,000 to 200,000
Dull metallic colours	5 to 50	5 to 50	5000 to 50,000
Rainbow sheen	0.30 to 5.00	0.30 to 5.00	300 to 5000
Silver sheen	0.04 to 0.30	0.04 to 0.30	40 to 300

Dissolved Marine Diesel Hydrocarbon Threshold Concentrations

The dissolved aromatic threshold of 50 ppb for diesel has been selected as a medium level threshold to approximate the potential toxic effects, particularly sub-lethal effects to sensitive species, as consistent with the NOPSEMA Oil Spill Modelling Guidance Bulletin (NOPSEMA, 2019). Dissolved hydrocarbons present a narcotic effect resulting from uptake into the tissues of marine organisms. This effect is additive, increasing with exposure concentration or with time of exposure (French-McCay, 2002; NRC, 2005).

Entrained Marine Diesel Hydrocarbon Threshold Concentrations

The spill modelling outputs are used to define the EMBA by defining the spatial variability of entrained hydrocarbons above a set concentration threshold contacting sensitive receptors (expressed in ppb).

Entrained hydrocarbons present a number of possible mechanisms for toxic exposure to marine organisms. The entrained hydrocarbon droplets may contain soluble compounds, hence have the potential for generating elevated concentrations of dissolved aromatic hydrocarbons (e.g. if mixed by breaking waves against a shoreline). Physical and chemical effects of the entrained hydrocarbon droplets have also been demonstrated through direct contact with organisms, for example through physical coating of gills and body surfaces, and accidental ingestion (National Research Council 2005).

The entrained threshold for diesel has been selected to be consistent with the NOPSEMA Oil Spill Modelling Guidance Bulletin (NOPSEMA, 2019). An entrained threshold of 100 ppb is therefore considered to be appropriate given the oil characteristics for informing potential impacts to receptors.

Accumulated Marine Diesel Hydrocarbon Threshold Concentrations

Owens et al. (1994) define accumulated hydrocarbon <100 g/m² to have an appearance of a stain on shorelines. French-McCay (2009) defines accumulated hydrocarbons ≥100 g/m² to be the threshold that could impact the survival and reproductive capacity of benthic epifaunal invertebrates living in intertidal habitat. A threshold of ≥100 g/m² has therefore been adopted to define the EMBA for a marine diesel spill. Further, any ecological impacts at the accumulated thresholds concentration EMBA may also result in socio-cultural impacts.

6.7.1.3 Scientific Monitoring

A planning area for scientific monitoring is also described in **Section 5.5** of the Oil Spill Preparedness and Response Mitigation Assessment (**Appendix D**). This planning area has been defined with reference to the low exposure entrained value of 10 ppb detailed in NOPSEMA Bulletin #1 Oil Spill Modelling (2019). This low exposure threshold is based on the potential for exceeding water quality triggers.

A scientific monitoring program would be activated following a Level 2 or 3 unplanned hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors. This would consider receptors at risk (ecological and socio-economic) for the entire predicted EMBA and in particular, any identified Pre-emptive Baseline Areas (PBAs) for the worst-case credible spill scenario(s) or other identified unplanned hydrocarbon releases associated with the operational activities.

6.7.2 Accidental Hydrocarbon Release: Vessel Collision

Context														
Project Vessels – Section 3.5.5			Physical Environment – Section 4.4 Biological Environment – Section 4.5 Socio-Economic Environment – Section 4.10					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted						Evaluation							
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socio-Economic	Decision Type	Consequence/Impact	Likelihood	Current Risk Rating	ALARP Tools	Acceptability	Outcome
Hydrocarbon release to the marine environment due to a vessel collision (between Project vessels or third-party vessels)			X		X	X	X	A	D	1	M	LC S GP	Acceptable	EPO 10
Description of Source of Risk														
<p>Background</p> <p>The seismic vessel may have a fuel distributed into multiple isolated tanks. Individual marine diesel tanks. At least one support vessel will accompany the seismic vessel during the Petroleum Activities Program. Typical project support vessels for seismic operations have multiple marine diesel tanks typically ranging in size. In the unlikely event of a vessel collision involving a Project vessel during the Petroleum Activities Program, the vessel will have the capability to pump marine diesel from a ruptured tank to a tank with spare volume in order to reduce the potential volume of fuel released to the environment. A volume of 250 m³ of MDO is considered an appropriate worst-case for a single fuel tank, based on existing facilities.</p> <p>Project vessels (seismic vessel and support vessel(s)) will be present in the Operational Area for the duration of the Petroleum Activities Program. This presence in the area will result in a navigational hazard for other marine users within the immediate area of the vessel (as discussed in Section 6.6.1).</p> <p>Industry Experience</p> <p>Registered vessels or foreign flag vessels in Australian waters are required to report events to the Australian Transport Safety Bureau (ATSB), AMSA or Australian Search and Rescue.</p> <p>From a review of the ATSB marine safety and investigation reports, one vessel collision occurred in 2011–2012 that resulted in a spill of 25–30 L of oil into the marine environment as a result of a collision between a tug and activity support vessel off Barrow Island. Two other vessel collisions occurred in 2010, one in the port of Dampier, where an activity support vessel collided with a barge being towed. Minor damage was reported and no significant injury to personnel or pollution occurred. The second 2010 vessel collision involved a vessel under pilot control in port connected with a vessel alongside a wharf causing it to sink. No reported pollution resulted from the sunken vessel. These incidents demonstrate the likelihood of only minor volumes of hydrocarbons being released during the highly unlikely event of a vessel collision occurring.</p> <p>From 2010 to 2011, the ATSB's annual publication defines the individual safety action factors identified in marine accidents and incidents: 42% related to navigation action (2011). Of those, 15% related to poor communication and 42% related to poor monitoring, checking and documentation. The majority of these related to the grounding instances.</p>														

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Credible Spill Scenario

For a vessel collision to result in the worst-case scenario of a hydrocarbon spill potentially impacting an environmental receptor, several factors must align as follows:

- The identified causes of vessel interaction must result in a collision.
- The collision must have enough force to penetrate the vessel hull.
- The collision must be in the exact location of the fuel tank.
- The fuel tank must be full, or at least of volume which is higher than the point of penetration.

The probability of the chain of events described above aligning, to result in a breach of fuel tanks resulting in a spill that could potentially affect the marine environment is considered remote. Given the offshore location of the Operational Area, vessel grounding is not considered a credible risk.

The environmental risk analysis and evaluation identified and assessed a range of potential scenarios that could result in a loss of vessel structural integrity, resulting in damage to fuel storage tank(s) and a loss of marine diesel to the marine environment (**Table 6-16**). The scenarios considered damage to single and multiple fuel storage tanks in a project vessel due to dropped objects and various combinations of vessel-to-vessel collision scenarios.

The scenarios considered comprised of a collision of the support vessel and the seismic vessel with each other or with a third party vessel (i.e. commercial shipping, other petroleum related vessels and commercial fishing vessels). The likelihood of a collision was assessed as being remote, given standard vessel operations and equipment in place to prevent collision at sea, the standby role of a support vessel (low vessel speed) and its operation in close proximity to the seismic vessel (SNA), and the construction and placement of storage tanks. The largest tank of the support vessel is unlikely to exceed 250 m³. For the purposes of this assessment a worst-case instantaneous loss of 250 m³ from a diesel tank on the seismic vessel has been considered.

Table 6-16: Summary of credible hydrocarbon spill scenario as a result of vessel collision

Scenario	Hydrocarbon Volumes	Preventative and Mitigation Controls	Credibility	Max. Possible Volume loss (m³)
Hydrocarbon release caused by vessel collision (seismic vessel)	250 m ³ instantaneous	Typically double wall, tanks which are located mid-ship (not bow or stern). Vessels are not anchored and steam at low speeds when relocating within the Operational Areas or providing stand-by cover. Normal maritime procedures would apply during such vessel movements.	Credible A vessel collision could potentially result in a release from a seismic vessel fuel tank.	250 m ³
Hydrocarbon release caused by vessel collision (support vessel)	250 m ³ instantaneous	Typically double wall, tanks which are located mid-ship (not bow or stern). Vessels are not anchored and steam at low speeds when relocating within the Operational Areas or providing stand-by cover. Normal maritime procedures would apply during such vessel movements.	Credible A vessel collision could potentially result in a release from a support vessel fuel tank.	250 m ³

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Quantitative Hydrocarbon Risk Assessment

To inform the impact assessment, quantitative hydrocarbon spill modelling was undertaken for the worst-case hydrocarbon release scenario (RPS, 2019). It is not practicable for spill modelling to be undertaken at every potential spill location within the Operational Area. The release location was selected by considering locations that would:

- have the greatest potential environmental consequence to the receiving environment (closest to sensitive receptors)
- be considered at greater risk of a spill event.

Existing modelling for a spill of MDO within WA-61-L at the approximate location of the proposed FPU (the installation and operation of the FPU is outside the scope of this Activity) was selected as an analogue for the worst case spill scenario for this location. The FPU location is within the Operational Area and considered conservative, as it is located closer to shoreline receptors than the other locations within the Operational Area. The loss of containment volume applied in the existing study aligns with the worst case credible loss of containment scenario for this activity. The coordinates of the spill release location for 250m³ are:

Location	Coordinates
Location of the FPU	19° 55'33.60" S 113° 14' 31.20"E

Hydrocarbon Characteristics

DO is a non-persistent fuel oil and contains a small proportion of heavy components (or low volatile components) that tend to physically entrain into the upper water column in the presence of moderate winds (i.e. >12 knots) and breaking waves but may re-float to the surface if these conditions abate. In the event of a substantial spill, the heavier components can remain entrained or remain on the sea surface for an extended period. The characteristics of the marine diesel are given in **Table 6-13**.

When spilled into the warm tropical and subtropical marine environment expected, MDO spreads rapidly and forms a very thin slick, with most of the volatile components typically evaporating in less than a day. Approximately 41% by mass of this oil is predicted to evaporate over the first couple of days depending on the prevailing wind conditions, with further evaporation slowing over time. The heavier (low volatility) components of the oil tend to entrain into the upper water column due to wind-generated waves, but can subsequently resurface depending on conditions (RPS, 2019).

RPS conducted weathering simulations to illustrate the potential behaviour of MDO when exposed at the water's surface under constant (5 knots) and variable wind conditions (**Figure 6-5**). Variable wind conditions generate greater entrainment of the hydrocarbon in the water column. Approximately 24 hours after the spill, around 45% of the oil mass is forecast to have entrained and a further 36% is forecast to have evaporated, leaving only a small proportion of the oil floating on the water surface (<1%). The residual compounds will tend to remain entrained beneath the surface under conditions that generate wind waves (approximately >6 m/s).

Variable wind does result in a higher percentage of biological and photochemical degradation, with an approximate rate of 1.8% per day. Whereas the constant wind scenario shows ~50% of the oil evaporates within 36 hours with negligible entrainment, but with a rate of only ~0.2% degradation per day.

Given the environmental conditions experienced in the Operational Area, marine diesel is expected to undergo rapid spreading and this, together with evaporative loss, is likely to result in a rapid dissipation of the spill. Marine diesel distillates tend not to form emulsions at the temperatures found in the region. The characteristics of the marine diesel are given in **Table 6-13**.

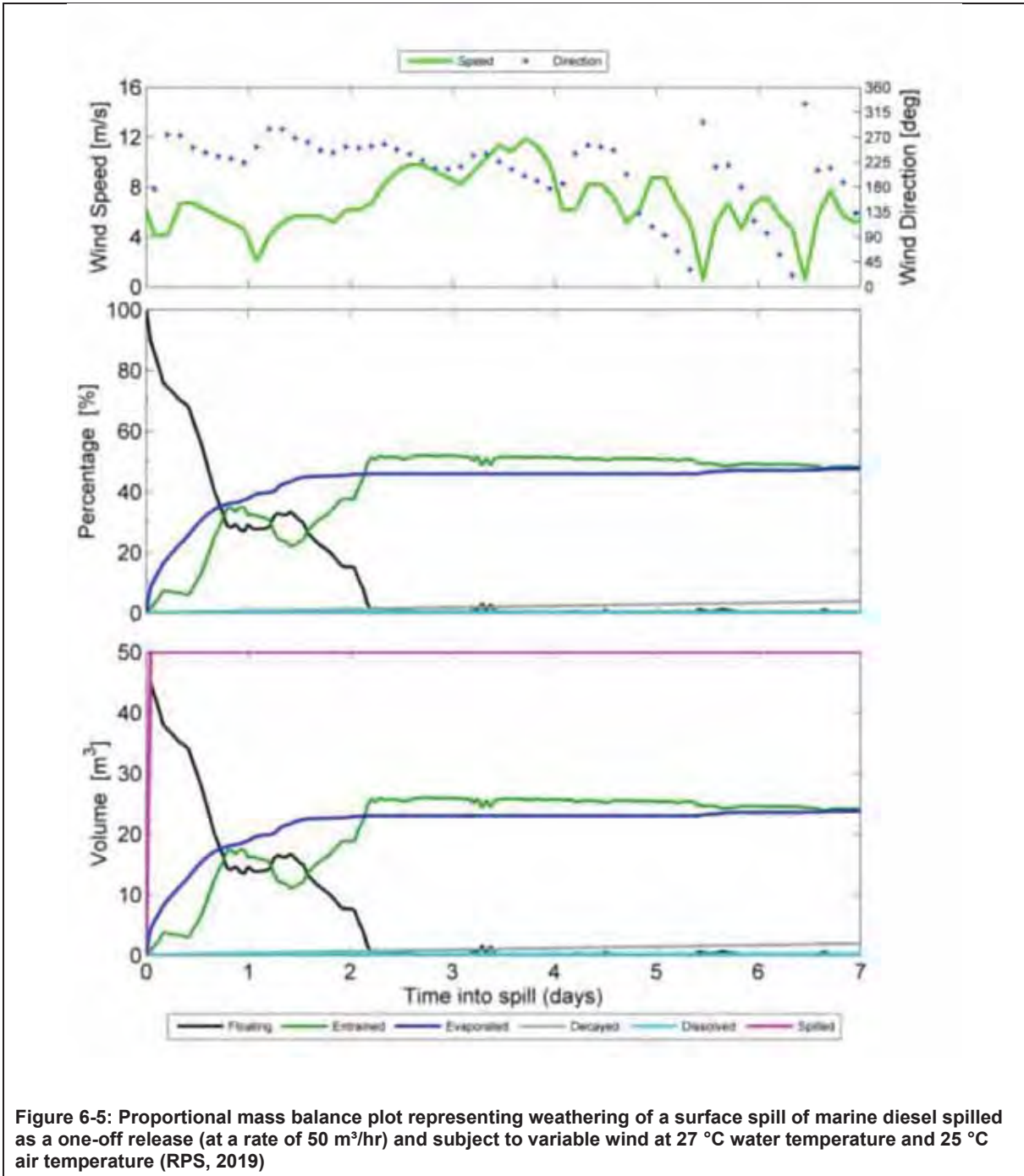


Figure 6-5: Proportional mass balance plot representing weathering of a surface spill of marine diesel spilled as a one-off release (at a rate of 50 m³/hr) and subject to variable wind at 27 °C water temperature and 25 °C air temperature (RPS, 2019)

Consequence Assessment
Potential Impacts Overview
<p>Environment that May Be Affected</p> <p>The overall EMBA for the Petroleum Activities Program is based on stochastic modelling, which compiles data from 100 hypothetical worst-case spills under a variety of weather and metocean conditions (as described in Section 6.7.1). Spill modelling was undertaken based on an instantaneous surface release of 250 m³ of marine diesel.</p>

Consequence Assessment

As the weathering of different fates of hydrocarbons (surface, entrained and dissolved) differs due to the influence of the metocean transport mechanism, a different EMBA is discussed for each fate.

Surface hydrocarbons

Quantitative hydrocarbon spill modelling results for surface hydrocarbons are shown in **Table 6-17**. The modelling indicates that the spill would be localised and confined to open water, extending up to approximately 52 km (at or above the 10 g/m³ impact threshold) from the release location.

A socio-cultural EMBA for surface hydrocarbons which includes the threshold for visible surface hydrocarbons of 1 g/m² may extend up to approximately 58 km from the release site.

Entrained hydrocarbons

Quantitative hydrocarbon spill modelling results for entrained hydrocarbons are shown in **Table 6-17**. If a vessel collision scenario occurred, the plume of entrained hydrocarbons would form down-current of the release location, with the trajectory dependent on the prevailing current conditions at the time. The modelling indicates that locations exposed to entrained hydrocarbons at or above the threshold concentration of 100 ppb are restricted to offshore areas up to approximately 236 km from the release site. The only receptor predicted to be contacted by entrained oil concentrations at the 100 ppb threshold was Gascoyne Marine Park (**Table 6-17**). The maximum entrained oil concentration forecast for Gascoyne Marine Park was 998 ppb. Concentrations above 100 ppb are not expected to exceed depths of approximately 15 m below mean sea level (BMSL).

Dissolved hydrocarbons

Quantitative hydrocarbon spill modelling results for dissolved hydrocarbons are shown in **Table 6-17**. The modelling indicates that locations exposed to dissolved hydrocarbons at or above the threshold concentration of 50 ppb are restricted to offshore areas up to approximately 145 km from the release site. No contact with sensitive receptor locations is predicted.

Accumulated hydrocarbons

Quantitative hydrocarbon spill modelling results for accumulated hydrocarbons are shown in **Table 6-17**. Accumulated hydrocarbons above threshold concentrations (>100 g/m²) were not predicted by the modelling to occur. Floating oil at concentrations equal to or greater than 1 g/m² are not predicted to contact any shoreline receptors.

Summary of Potential Impacts to Environmental Values

Table 6-17 presents the full extent of the EMBA, i.e. the sensitive receptors and their locations that may be exposed to hydrocarbons (surface, entrained and dissolved) at or above the set threshold concentrations in the unlikely event of a marine diesel spill from a vessel collision during the Petroleum Activities Program. Details of these receptors are outlined in **Section 4**. The potential biological and ecological impacts of an accidental hydrocarbon release as a result of a vessel collision during the Petroleum Activities Program are presented in the following sections.

Summary of Potential Risk and Impacts to Environmental Values(s)
Summary of potential impacts to protected species
Marine mammals (Cetaceans and dugongs)
<p>Marine mammals that have direct physical contact with surface, entrained or dissolved aromatic hydrocarbons may suffer surface fouling, ingestion of hydrocarbons (from prey, water and sediments), aspiration of oily water or droplets, and inhalation of toxic vapours (DWH Natural Resource Damage Assessment Trustees, 2016). This may result in the irritation of sensitive membranes such as the eyes, mouth, digestive and respiratory tracts and organs, impairment of the immune system, neurological damage (Helm et al., 2015), reproductive failure, adverse health effects (e.g. lung disease, poor body condition) and potentially mortality (DWH Natural Resource Damage Assessment Trustees, 2016). In a review of cetacean observations relating to a number of large-scale hydrocarbon spills, Geraci (1988) found little evidence of mortality associated with hydrocarbon spills. However, it was concluded that exposure to oil from the DWH resulted in increased mortality to cetaceans in the Gulf of Mexico (DWH Natural Resource Damage Assessment Trustees, 2016). Geraci (1988) did identify behavioural disturbance (i.e. avoiding spilled hydrocarbons) in some instances for several species of cetacean, suggesting that cetaceans have the ability to detect and avoid surface slicks. However, observations during spills have recorded larger whales (both mysticetes and odontocetes) and smaller delphinids travelling through and feeding in oil slicks. During the DWH spill, cetaceans were routinely seen swimming in surface slicks offshore (and nearshore) (Achinger Dias et al., 2017).</p> <p>Impacts to cetaceans depends on the exposure pathway; with exposure to entrained oil and surface slicks not expected to result in significant impacts due to the relatively volatile, non-persistent nature of the hydrocarbons. Direct toxic effects from external exposure are not expected to occur, although mucous membranes and eyes may become irritated. Indirect toxic effects, such as hydrocarbon ingestion through accumulation in prey may occur. Baleen whales feeding within entrained hydrocarbon plumes may ingest hydrocarbons, potentially resulting in toxic effects (particularly fresh hydrocarbons near the release location).</p> <p>Four threatened and migratory, and six migratory cetacean species were identified by a search of the EPBC Act Protected Matters Database, as potentially occurring in the EMBA (refer to Section 4.6.3). No BIAs for cetacean species were identified as occurring within the Operational Area, however a pygmy blue whale migration and foraging BIA, and humpback whale migration BIA occur within the EMBA. The pygmy blue whale is the species most likely to occur within the Operational Area during their northern migration from April to August. However, the presence of all cetacean species, including the pygmy blue whale, is likely to be limited to infrequent occurrences of individuals or small groups.</p> <p>A loss of marine diesel from a vessel collision could result in a disruption to individual marine mammals transiting the EMBA. Such disruption could include behavioural impacts (e.g. avoidance of impacted areas), sub-lethal biological effects (e.g. skin irritation, irritation from ingestion or inhalation) and, in rare circumstances, death. However, such disruptions or impacts are not predicted to impact on the overall population viability of the species within the EMBA.</p>
Marine reptiles (Marine turtles)
<p>Adult sea turtles exhibit no avoidance behaviour when they encounter hydrocarbon slicks (NOAA, 2010). Contact with surface slicks, or entrained hydrocarbon, can therefore, result in hydrocarbon adherence to body surfaces (Gagnon and Rawson, 2010) causing irritation of mucous membranes in the nose, throat and eyes leading to inflammation and infection (NOAA, 2010). Oiling can also irritate and injure skin which is most evident on pliable areas such as the neck and flippers (Lutcavage et al., 1995). A stress response associated with this exposure pathway includes an increase in the production of white blood cells, and even a short exposure to hydrocarbons may affect the functioning of their salt gland (Lutcavage et al., 1995).</p> <p>Hydrocarbons in surface waters may also impact turtles when they surface to breathe and inhale toxic vapours. Their breathing pattern, involving large 'tidal' volumes and rapid inhalation before diving, results in direct exposure to petroleum vapours which are the most toxic component of the hydrocarbon spill (Milton and Lutz, 2003). This can lead to lung damage and congestion, interstitial emphysema, inhalant pneumonia and neurological impairment (NOAA, 2010). Contact with entrained hydrocarbons can result in hydrocarbon adherence to body surfaces causing irritation of mucous membranes in the nose, throat and eyes leading to inflammation and infection (Gagnon and Rawson, 2010).</p> <p>There are no marine turtle BIAs within the Operational Area or EMBA, however there is one habitat critical for the survival of flatback turtles that partially overlaps the EMBA (refer to Section 4.6.2). The nearest interesting buffer BIAs is located approximately 135 km south-east of the Operational Area. The 60 km interesting buffer for flatback turtles in the Recovery Plan for Marine Turtles in Australia (DoEE, 2017a) is considered very conservative. There is no evidence to date to indicate that flatback turtles swim out into deep offshore waters during the interesting period. Additionally, suitable areas of interesting habitat were located close to many known flatback turtle rookeries across the region (Whitlock et al., 2016). Flatback turtle hatchlings do not undertake oceanic migrations offshore to deep, pelagic waters. Instead, juveniles grow to maturity in shallow coastal waters close to their natal beaches (Musick and Limpus, 1996).</p> <p>Due to the absence of potential nesting habitat and the offshore location, the Operational Area is unlikely to represent important habitat for marine turtles (over 200 km from suitable nesting habitat at the Montebello Islands and Barrow</p>

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Summary of Potential Risk and Impacts to Environmental Values(s)
<p>Island). In the event of a vessel collision, a marine diesel spill may impact individual marine turtles that have direct contact with hydrocarbons within the spill affected area but the consequences to marine turtle populations are likely to be minor.</p>
Sharks and rays
<p>Impacts to sharks and rays may occur through direct contact with hydrocarbons and contaminate the tissues and internal organs either through direct contact or via the food chain (consumption of prey). In the offshore environment, it is probable that pelagic shark species are able to detect and avoid surface waters underneath hydrocarbon spills by swimming into deeper water or away from the affected areas. Therefore, any impact on sharks and rays is predicted to be minor and only a temporary disruption.</p> <p>Hydrocarbon contact may affect whale sharks through ingestion (entrained/dissolved hydrocarbons), particularly if feeding. A foraging BIA for the whale shark is located within the EMBA (refer to Section 4.6.1), approximately 136 km south-east of the Operational Area, representing an area where solitary whale sharks may forage during their migration from Ningaloo (primarily between September and November). Therefore, individual whale sharks that have direct contact with hydrocarbons within the spill affected area may be impacted but the consequences to migratory whale shark populations are likely to be minor.</p>
Seabirds and/or migratory shorebirds
<p>As outlined in Section 4.6.4, 20 species of seabirds and/or migratory shorebirds were identified by the PMST as potentially occurring within the EMBA, including 10 threatened species. There are no BIAs for any bird species located within the Operational Area, however the EMBA overlaps with a wedge-tailed shearwater breeding BIA located approximately 85 km south-east of the Operational Area.</p> <p>Seabirds generally do not exhibit avoidance behaviour to floating hydrocarbons. Physical contact of seabirds with surface slicks is by several exposure pathways, primarily, immersion, ingestion and inhalation. Such contact with hydrocarbons may result in plumage fouling and hypothermia (loss of thermoregulation), decreased buoyancy and potential to drown, inability to fly or feed, anaemia, pneumonia and irritation of eyes, skin, nasal cavities and mouths (AMSA, 2013; IPIECA, 2004) and result in mortality due to oiling of feathers or the ingestion of hydrocarbons. Longer-term exposure effects that may potentially impact seabird populations include a loss of reproductive success (loss of breeding adults) and malformation of eggs or chick (AMSA, 2013). The extent of the EMBA for a surface slick may result in impacts on feeding habitat, however this is not expected to result in a threat to the overall population viability of seabirds or shorebirds.</p> <p>Accumulated hydrocarbons above threshold concentrations (>100 g/m²) were not predicted to occur at any shorelines. Floating oil at concentrations equal to or greater than 1 g/m² are not predicted to contact any shoreline receptors. Therefore, no impacts are expected to important nesting habitat.</p>
Summary of potential impacts to other habitats and communities
Benthic fauna communities
<p>Given the deep water depths of the EMBA (>100 m) benthic fauna communities located within the EMBA will not be directly exposed or impacted by a marine diesel spill as hydrocarbons (surface, entrained and dissolved) are confined to the upper layers of the water column.</p>
Plankton and fish communities
<p>There is potential for plankton communities to be impacted by a marine diesel spill where entrained hydrocarbons thresholds are exceeded; however communities are expected to recover quickly (weeks/months) due to high population turnover (ITOPF, 2011). Considering the fast population turn-over of open water plankton populations, it is considered that any potential impacts will be low and temporary in nature.</p> <p>Fish populations in the open water offshore environment of the Operational Area and EMBA are highly mobile and can move away from a marine diesel spill. The spill-affected area will likely be confined to the upper surface layers. It is therefore unlikely that fish populations would be exposed to hydrocarbon contamination. Fish populations are likely to be distributed over a wide geographical area so impacts on populations or species level are considered to be negligible. Given the above factors and the rapid dispersion of marine diesel, it is considered that any potential impacts to fish will be negligible.</p>
Spawning/nursery areas
<p>Fish (and other commercially targeted taxa) in their early life stages (eggs, larvae and juveniles) are at their most vulnerable to lethal and sub-lethal impacts from exposure to hydrocarbons, particularly if a spill coincides with spawning seasons or if a spill reaches nursery areas close to the shore (e.g. seagrass and mangroves) (International Tanker Owners Pollution Federation [ITOPF], 2011a). Fish spawning (including for commercially targeted species</p>

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Summary of Potential Risk and Impacts to Environmental Values(s)

such as snapper and mackerel) mostly occurs in nearshore waters at certain times of the year and nearshore waters are also inhabited by higher numbers of juvenile fishes than offshore waters.

Modelling indicated that in the unlikely event of a marine diesel spill there is potential for entrained hydrocarbons to occur in the surface water layers above threshold concentrations up to approximately 236 km from the release site, and approximately 35 km from the shoreline at the closest point off Cape Range National Park. Therefore, there is the potential for lethal and sub-lethal impacts to a certain portion of fish larvae in affected areas, depending on concentration and duration of exposure and the inherent toxicity of the hydrocarbon. Losses of fish larvae in worst affected areas are unlikely to be of major consequence to fish stocks compared with significantly larger losses through natural predation, and the likelihood that most nearshore areas would be exposed is low. This is supported by a recent study in the Gulf of Mexico which used juvenile abundance data as indices of the acute, population-level responses of young fishes to the Deepwater Horizon spill. Results indicated that there was no change to the juvenile cohorts following this spill. Additionally there were no significant post-spill shifts in community composition and structure, nor were there changes in biodiversity measures (Fodrie and Heck, 2011). Any impacts to spawning and nursery areas are expected to be slight and short term, as would flow on effects to adult fish stocks into which larvae are recruited.

Coral reef habitat

Exposure to entrained hydrocarbons has the potential to result in lethal or sub-lethal toxic effects to corals and other sensitive sessile benthos within the upper water column, including subtidal corals. Mortality in a number of coral species is possible and this would result in the reduction of coral cover and change in the composition of coral communities. Sub-lethal effects to corals may include polyp retraction, changes in feeding, bleaching (loss of zooxanthellae), increased mucous production resulting in reduced growth rates and impaired reproduction (Negri and Heyward, 2000). In the unlikely event of a marine diesel spill occurring at the time of coral spawning at potentially affected coral locations or in the general peak period of biological productivity, there is potential for a reduction in successful fertilization and coral larval survival due to the sensitivity of coral early life stages to hydrocarbons (Negri and Heyward, 2000). Such impacts are likely to result in the failure of recruitment and settlement of new population cohorts. In addition, some non-coral species may be affected via direct contact with entrained hydrocarbons, resulting in sub-lethal impacts and in some cases mortality. This is with particular reference to the early life-stages of coral reef animals (reef attached fishes and reef invertebrates), which can be relatively sensitive to hydrocarbon exposure. Coral reef fish are site attached, have small home ranges and as reef residents they are at higher risk from hydrocarbon exposure than non-resident, more wide-ranging fish species. The exact impact on resident coral communities will be entirely dependent on actual hydrocarbon concentration, duration of exposure and water depth of the affected communities.

The modelling indicates that locations exposed to entrained hydrocarbons at or above the threshold concentration of 100 ppb are restricted to offshore areas up to approximately 236 km from the release site, and dissolved hydrocarbons at or above the threshold concentration of 50 ppb are restricted to offshore areas up to approximately 145 km from the release site. The nearest coral reef habitat (Ningaloo Reef) is located over 30 km outside of the extent of the area exposed to entrained hydrocarbons, and therefore coral reef habitats will not be directly exposed or impacted by a marine diesel spill.

Key Ecological Features

KEFs potentially impacted by a marine diesel spill from a vessel collision event are:

- Exmouth Plateau
- Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula
- Continental slope demersal fish communities

These KEFs are primarily defined by seabed geomorphological features and/or indicate a potential for increased biological productivity and, therefore, ecological significance.

The consequences of a marine diesel spill from a vessel collision may impact the values of the KEFs affected (for the values of each KEF see Woodside's Existing Environment (**Appendix H**). Potential impacts to the above KEFS include, impacts to demersal fish populations and reduced biodiversity. Impacts to benthic habitats are not predicted as hydrocarbons (surface, entrained and dissolved) will be limited to the upper layers of the water column. Most of the KEFs within the EMBA have relatively broad-scale distributions and are unlikely to be significantly impacted.

Therefore, a worst-case hydrocarbon spill scenario has the potential to result in minor, short-term impacts to the ecological values of KEFs within the EMBA, with impacts predicted to be greatest within surface water layers closest to the potential release location.

Summary of potential impacts to water quality

Water quality would be affected due to hydrocarbon contamination which is described in terms of the biological effect concentrations. These are defined by the EMBA descriptions for each of, entrained and dissolved hydrocarbon fates

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Summary of Potential Risk and Impacts to Environmental Values(s)
and their predicted extent (refer to Table 6-17). Furthermore, water quality is predicted to have minor long-term and/or significant short-term hydrocarbon contamination above background and/or national/international quality standards.
Summary of potential impacts to marine sediment quality
Given the deep water depths of the EMBA (>100 m) marine sediment quality will not be directly impacted by a marine diesel spill as hydrocarbons (surface, entrained and dissolved) are confined to the upper layers of the water column.
Summary of potential impacts to protected areas (including AMPs)
<p>The quantitative spill risk assessment results indicate that the open water environment protected within the Gascoyne AMP, may be affected by the released hydrocarbons (refer to Table 6-17). It is noted that there are no State or Territory protected areas within the EMBA.</p> <p>Spill modelling predicts that the Gascoyne AMP may be contacted by entrained hydrocarbons above the 100 ppb ecological impact threshold with a probability of 4%. The Gascoyne AMP contains marine fauna and biological communities, which are considered to be of important environmental value that the AMP is intended to protect.</p> <p>Impact on the values of the above AMPs (refer to Woodside's Existing Environment (Appendix H)) are discussed in the relevant sections above for ecological and physical values and below for socio-economic and cultural values.</p> <p>Additionally, such hydrocarbon contact may alter stakeholder understanding and/or perception of the protected marine environment, given these represent areas largely unaffected by anthropogenic influences and contain biological diverse environments.</p>
Summary of potential impacts to socio-economic and cultural values
Fisheries – commercial
<p>Fish exposure to hydrocarbon can result in 'tainting' of their tissues. Even very low levels of hydrocarbons can impart a taint or 'off' flavour or smell in seafood. Tainting is reversible through the process of depuration which removes hydrocarbons from tissues by metabolic processes, although it is dependent upon the magnitude of the hydrocarbon contamination. Fish have a high capacity to metabolise these hydrocarbons while crustaceans (such as prawns) have a reduced ability (Yender et al., 2002). Seafood safety is a major concern associated with spill incidents. Therefore, actual or potential contamination of seafood can affect commercial and recreational fishing and can impact seafood markets long after any actual risk to seafood from a spill has subsided (Yender et al., 2002). A spill would result in the establishment of an exclusion zone around the spill affected area. There would be a temporary prohibition on fishing activities for a period of time and subsequent potential for economic impacts to affected commercial fishing operators.</p> <p>A loss of marine diesel result from a vessel collision is unlikely to cause significant direct impacts on the target species of Commonwealth and WA commercial fisheries within the defined EMBA. Further details are provided below.</p> <p>Commonwealth fisheries</p> <p>The predicted EMBA resulting from a marine diesel spill may impact on the area fished by the Western Deepwater Trawl Fishery (refer to Section 4.10.2). This fishery generally targets deepwater bugs, deepwater flathead, boarfish, dory and snapper using demersal (bottom) trawl gear (DoE, 2020). Fishing takes place in waters deeper than 200 m. The temporary nature of the predicted marine diesel spill would infer that it is unlikely the hydrocarbon concentrations in the upper surface layers would lead to potential exposure of bottom dwelling target species to contamination.</p> <p>WA fisheries</p> <p>The predicted EMBA resulting from a marine diesel spill may impact the area fished by a number of State fisheries (refer to Section 4.10.2). These fisheries generally use a range of gear types and operate in shallow inshore waters to water depths up to 1,200 m, targeting demersal and pelagic finfish species, crustaceans, and a range of other benthic species. In the unlikely event of a marine diesel spill, there is potential for the targeted fish species to be exposed to entrained hydrocarbons in the water column. However, the potential for direct impact would be reduced as target species such as snapper and mackerel are likely to avoid the surface water layer underneath oil slicks. The temporary nature of the predicted marine diesel spill would infer that it is unlikely the hydrocarbon concentrations in the upper surface layers would lead to potential exposure of pelagic fish to contamination. Demersal species (such as finfish) have limited mobility and therefore, will not be able to easily move away from a spill. As such, mortality/sub-lethal effects may impact demersal fish located close to the release location. Impacts to benthic species are unlikely as hydrocarbons are confined to the upper surface water layers.</p>
Fisheries – traditional
No designated traditional fisheries have been identified to occur within the EMBA and therefore no impacts to traditional fisheries are predicted to occur.
Tourism and recreational activities

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Summary of Potential Risk and Impacts to Environmental Values(s)
No known, regular tourism or recreational activities are expected to take place in the offshore waters of the EMBA and therefore impacts to these activities are highly unlikely and would be limited to negligible.
Offshore oil and gas activities
There are no other oil and gas facilities located within 50 km of the Operational Area therefore, the risk of vessel collision with oil and gas related activities is low. There are a number of oil and gas facilities that occur within the EMBA (i.e. Pluto Platform, Ngujima Yin FPSO). Avoidance of surface hydrocarbons is a possible response by other vessels. However, such occurrences will likely be limited to close proximity to the release site and other oil and gas activities are unlikely to be impacted.
Commercial shipping
A shipping fairway intersects the north-east corner of the Operational Area (refer to Figure 4-16), therefore, loss of marine diesel from a vessel collision may lead to exclusion of commercial shipping near the release location, resulting in operational inconvenience as vessels may be required to deviate course from intended routes.
Cultural heritage
No listed World Heritage Places, Indigenous Sites of Significance, Commonwealth Heritage Places or National Heritage Places were identified in the EMBA. A search of the Australasian Underwater Cultural Heritage Database (Section 4.10.1.9), which records all known Maritime Cultural Heritage (shipwrecks, aircraft, relics and other underwater cultural heritage) in Australian waters, indicated that there are nine Underwater Cultural Heritage sites within the EMBA. These heritage sites are located on the seabed, and will not be directly impacted by a marine diesel spill as hydrocarbons (surface, entrained and dissolved) are confined to the upper layers of the water column. In addition, as described in Section 4 , no ethnographic values are known to occur within the Operational Area or EMBA. This work did identify ethnographic sites onshore, but these are beyond the EMBA and scope of this EP. It was noted that some traditional knowledge of ethnographic values has been lost through the effects of colonisation generally, and as a result of the Flying Foam Massacre in particular. In summary no impacts to traditional or cultural heritage values are expected.

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹²	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Comply with Marine Order 30 (prevention of collisions) 2016, including: <ul style="list-style-type: none"> adherence to steering and sailing rules including maintaining lookouts (e.g. visual, hearing, radar, etc.), proceeding at safe speeds, assessing risk of collision and taking action to avoid collision (monitoring radar) adherence to navigation light display requirements, including visibility, light position/shape 	F: Yes. CS: Minimal cost. Standard practice.	Legislative requirement to reduce the likelihood of interference with other marine users resulting in a collision.	Controls based on legislative requirements – must be adopted	Yes C 10.1

¹² Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹²	Benefit/Reduction in Impact	Proportionality	Control Adopted
<p>appropriate to activity</p> <ul style="list-style-type: none"> adherence to navigation noise signals as required. 				
<p>Comply with Marine Order 27 (Safety of navigation and radio equipment) 2016, including:</p> <ul style="list-style-type: none"> navigational systems and equipment mentioned in Regulations 19 and 20 of Chapter V of SOLAS for the vessel are type approved and installed on board vessels navigational systems and equipment mentioned in Regulations 7 to 11 of Chapter IV of SOLAS are installed on board vessels navigational systems and equipment are maintained in working order navigational activities and incidents of importance to safety of navigation on the vessel are recorded. 	<p>F: Yes. CS: Minimal cost. Standard practice.</p>	<p>Legislative requirement to reduce the likelihood of interference with other marine users resulting in a collision.</p>	<p>Controls based on legislative requirements – must be adopted</p>	<p>Yes C 10.2</p>
<p>Comply with Marine Order 21 (safety and emergency arrangements) 2020, including:</p> <ul style="list-style-type: none"> adherence to minimum safe manning levels maintenance of navigation equipment in efficient working order (compass/radar) navigational systems and 	<p>F: Yes. CS: Minimal cost. Standard practice.</p>	<p>Legislative requirement to reduce the likelihood of interference with other marine users resulting in a collision.</p>	<p>Controls based on legislative requirements – must be adopted</p>	<p>Yes C 10.3</p>

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹²	Benefit/Reduction in Impact	Proportionality	Control Adopted
<p>equipment required are those specified in Regulation 19 of Chapter V of SOLAS</p> <ul style="list-style-type: none"> AIS that provides other users with information about the vessel's identity, type, position, course, speed, navigational status and other safety-related data. 				
Good Practice				
Notify AHO of activities and movements no less than four weeks before the scheduled activity commencement date.	F: Yes CS: Minimal cost. Standard practice.	Notification to AHO will enable them to generate navigation warnings (Maritime Safety Information Notifications (MSIN)) and NTM (including AUSCOAST warnings where relevant)).	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.1
Notify AMSA JRCC of activities and movements 24–48 hours before the scheduled activity commencement date.	F: Yes CS: Minimal cost. Standard practice.	Communication of the Petroleum Activities Program to other marine users ensures they are informed and aware, thereby reducing the likelihood of a collision with a third party vessel.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.2
Engage with proponents identified as having concurrent activities within the Operational Area prior to commencing the Petroleum Activities Program and develop an operations plan including the following aspects: <ul style="list-style-type: none"> communications work programming hazard management emergency response. 	F: Yes CS: Minimal cost. Standard practice.	Communication of the Petroleum Activities Program to other marine users ensures they are informed and aware, thereby reducing the likelihood of a collision with a third party vessel.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 1.4
Establish and maintain a 3 nm radius SNA around the seismic vessel and towed array.	F: Yes CS: Minimal cost. Standard practice.	Presence of the SNA will reduce the likelihood of a collision with a third party vessel.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 2.1
Employ at least one support/chase vessel to	F: Yes CS: Minimal cost. Standard practice.	Use of a support vessel to assist the seismic vessel will reduce the	Benefits outweigh cost/sacrifice.	Yes C 2.2

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹²	Benefit/Reduction in Impact	Proportionality	Control Adopted
assist the seismic vessel.		likelihood of a collision with a third party vessel.	Control is also standard practice.	
In the event of a spill, emergency response activities implemented in accordance with the OPEP.	F: Yes CS: Costs associated with implementing response strategies vary dependent on nature and scale of spill event. Standard practice.	Potentially reduces consequence by implementing response to reduce impacts to the marine environment,	Control based on regulatory requirement – must be adopted.	Yes C 10.4
Arrangements supporting the activities in the OPEP will be tested to ensure the OPEP can be implemented as planned.	F: Yes CS: Moderate costs associated with exercises. Standard practice.	No change to impact or risk, however ensures the OPEP can be implemented in the event of a hydrocarbon spill thereby potentially reducing the consequence.	Control based on regulatory requirement – must be adopted.	Yes C 10.5
Mitigation: Oil spill response.	Refer to Appendix D .			
Professional Judgement – Eliminate				
Eliminate use of vessels.	F: No. The use of vessels is required to conduct the Petroleum Activities Program. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				
Risk Based Analysis				
A quantitative spill risk assessment was undertaken (see detail above).				
ALARP Statement				
<p>On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A) Woodside considers the adopted controls appropriate to manage the impacts and risks of an unplanned loss of hydrocarbon resulting from vessel collision. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.</p>				

Demonstration of Acceptability
Acceptability Statement
<p>The impact assessment has determined that an accidental hydrocarbon release as a result of a vessel collision represents a moderate current risk rating and may result in a minor, short-term impact (1–2 years) on ecosystems, species, habitat or physical or biological attributes. Relevant recovery plans and conservation advice have been considered during the impact assessment, and the Petroleum Activities Program is not considered to be inconsistent with the overall recovery objectives and actions of these recovery plans and conservation advice.</p> <p>The adopted controls are considered consistent with industry legislation, codes and standards, good practice and professional judgement and meet the requirements and expectations of Australian Marine Orders, AMSA and AHO identified during impact assessment and stakeholder consultation. Hydrocarbon spills were raised during consultation (Table 5.4) and these were considered in the finalisation of the EP. On the basis of the environmental impact</p>

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Demonstration of Acceptability

assessment outcomes and Woodside's criteria for acceptability outlined in **Section 2.7.2**, this is considered an acceptable level of risk.

Environmental Performance Outcomes, Standards and Measurement Criteria

Outcomes	Controls	Standards	Measurement Criteria
EPO 10 No release of hydrocarbons to the marine environment due to a vessel collision during the Petroleum Activities Program.	C 10.1 Comply with Marine Order 30 (prevention of collisions) 2016, including: <ul style="list-style-type: none"> • adherence to steering and sailing rules including maintaining lookouts (e.g. visual, hearing, radar, etc.), proceeding at safe speeds, assessing risk of collision and taking action to avoid collision (monitoring radar) • adherence to navigation light display requirements, including visibility, light position/shape appropriate to activity • adherence to navigation noise signals as required. 	PS 10.1 Project vessels compliant with Marine Order 30 (prevention of collisions) 2016 (which requires vessels to be visible at all times).	MC 10.1.1 Marine Assurance inspection records demonstrate compliance with standard maritime safety procedures (Marine Orders 21, 27 and 30).
	C 10.2 Comply with Marine Order 27 (Safety of navigation and radio equipment) 2016, including: <ul style="list-style-type: none"> • navigational systems and equipment mentioned in Regulations 19 and 20 of Chapter V of SOLAS for the vessel are type approved and installed on board vessels • navigational systems and equipment mentioned in Regulations 7 to 11 of Chapter IV of SOLAS are installed on board vessels • navigational systems and equipment are maintained in working order • navigational activities and incidents of importance to safety of navigation on the vessel are recorded. 	PS 10.2 Project vessels compliant with Marine Order 27 (Safety of navigation and radio equipment) 2016.	

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	<p>C 10.3 Comply with Marine Order 21 (safety and emergency arrangements) 2020, including:</p> <ul style="list-style-type: none"> • adherence to minimum safe manning levels • maintenance of navigation equipment in efficient working order (compass/radar) • navigational systems and equipment required are those specified in Regulation 19 of Chapter V of SOLAS • AIS that provides other users with information about the vessel's identity, type, position, course, speed, navigational status and other safety-related data. 	<p>PS 10.3 Project vessels compliant with Marine Order 21 (safety of navigation and emergency procedures) 2016.</p>	
	<p>C 10.4 In the event of a spill, emergency response activities implemented in accordance with the OPEP.</p>	<p>PS 10.4 In the event of a spill the OPEP requirements are implemented.</p>	<p>MC 10.4.1 Records of completed incident documentation.</p>
	<p>C 10.5 Arrangements supporting the activities in the OPEP will be tested to ensure the OPEP can be implemented as planned.</p>	<p>PS 10.5.1 Exercises/tests will be conducted in alignment with the frequency identified in Table 7-6.</p>	<p>MC 10.5.1 Testing of arrangement records confirm that emergency response capability has been maintained.</p>
		<p>PS 10.5.2 Woodside's procedure demonstrates a minimum level of trained personnel, for core roles in the OPEP, are maintained.</p>	<p>MC 10.5.2 Emergency Management dashboard confirms that minimum level of personnel trained for core OPEP roles are available.</p>
	<p>C 1.1 Section 6.6.1</p>	<p>PS 1.1 Section 6.6.1</p>	<p>MC 1.1.1 Section 6.6.1</p>
	<p>C 1.2 Section 6.6.1</p>	<p>PS 1.2 Section 6.6.1</p>	<p>MC 1.2.1 Section 6.6.1</p>
	<p>C 1.4 Section 6.6.1</p>	<p>PS 1.4 Section 6.6.1</p>	<p>MC 1.4.1 Section 6.6.1</p>
	<p>C 2.1 Section 6.6.1</p>	<p>PS 2.1 Section 6.6.1</p>	<p>MC 2.1.1 Section 6.6.1</p>
	<p>C 2.2 Section 6.6.1</p>	<p>PS 2.2 Section 6.6.1</p>	<p>MC 2.2.1 Section 6.6.1</p>

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Environmental Performance Outcomes, Standards and Measurement Criteria			
<i>Outcomes</i>	<i>Controls</i>	<i>Standards</i>	<i>Measurement Criteria</i>
Detailed preparedness and response performance outcomes, standards and measurement criteria for the Petroleum Activities Program are provided in Appendix D .			

6.7.3 Accidental Hydrocarbon Release: Bunkering

Context														
Project Vessels – Section 3.5.5			Physical Environment – Section 4.4 Biological Environment – Section 4.5					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socio-Economic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Loss of hydrocarbons to the marine environment from bunkering/refuelling of seismic vessel			x		x	x	x	A	E	1	L	LCS GP	Broadly Acceptable	EPO 11
Description of Source of Risk														
<p>Credible Scenario</p> <p>Bunkering of marine diesel between the support vessel(s) and the seismic vessel may occur within the Operational Area.</p> <p>Two credible scenarios for the loss of containment of marine diesel during bunkering operations were identified:</p> <ul style="list-style-type: none"> • Partial or total failure of a bulk transfer hose or fittings during bunkering, due to operational stress or other integrity issues could spill marine diesel to the deck and/or into the marine environment. This would be in the order of less than 200 L, based on the likely volume of a bulk transfer hose (assuming a failure of the dry break and complete loss of hose volume). • Partial or total failure of a bulk transfer hose or fittings during bunkering, combined with a failure in procedure to shutoff fuel pumps, for a period of up to five minutes, resulting in approximately 8 m³ marine diesel loss to the deck and/or into the marine environment. <p>Quantitative Spill Risk Assessment</p> <p>Woodside has commissioned RPS to model several small marine diesel spills, including surface spill volumes of 8 m³ in the offshore waters of north-west WA. The results of these models have indicated that exposure to surface hydrocarbons above the 10 g/m² threshold is limited to the immediate vicinity of the release site, with little potential to extend beyond 1 km. Therefore, it is considered that exposure to threshold concentrations from an 8 m³ surface spill from bunkering activities would be well within the EMBA for the vessel collision scenario detailed in Section 6.7.2. Given this, the offshore location of the Operational Area, and the fact that the same hydrocarbon type is involved for both scenarios, specific modelling for an 8 m³ marine diesel release was not performed for this Petroleum Activities Program.</p> <p>Hydrocarbon Characteristics</p> <p>Refer to Section 6.7.1.1 for a description of the characteristics of marine diesel, including detail on the predicted fate and weathering of a spill to the marine environment.</p>														

Consequence Assessment
Potential Impacts to Environmental Values
Previous modelling studies for 8 m ³ marine diesel releases, spilt at the surface as result of bunkering activities, indicated that the potential for exposure to surface hydrocarbons exceeding 10 g/m ² was confined to within the immediate vicinity (approximately 1 km) of the release sites. Therefore, it is considered that there is no potential for

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Consequence Assessment
contact with sensitive receptor locations above surface (10 g/m ²), entrained (100 ppb) or dissolved (50 ppb) threshold concentrations from an 8 m ³ spill of marine diesel within the Operational Area.
Summary of Potential Risks and Impacts to Environmental Values(s)
<p>The potential biological and ecological impacts associated with a much larger hydrocarbon spill (2000 m³) are presented in Section 6.7.2, further detail on impacts specific to a spill of marine diesel from a bunkering loss are provided below.</p> <p>The biological consequences of such a small volume spill on identified open water sensitive receptors relate to the potential for minor impacts to megafauna, plankton and fish populations (surface and water column biota) that are within the spill affected area. No impacts to commercial fisheries and/or benthic habitats are expected. Refer to Section 6.7.2 (potential impacts of unplanned hydrocarbon release to the marine environment from vessel collision) for the detailed potential impacts; however, the extent of the EMBA associated with a marine diesel spill from loss during bunkering will be much reduced in terms of spatial and temporal scales, and hence, potential impacts from bunkering are considered slight and short-term (<1 year).</p>

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹³	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Marine Order 91 (marine pollution prevention – oil) 2014 which requires a Ship Oil Pollution Emergency Plan (SOPEP)/ Spill Monitoring Program Execution Plan (SMPEP) (as appropriate to vessel class).	F: Yes CS: Minimal cost. Standard Practice.	Reduces the likelihood of a spill entering the marine environment. Although no significant reduction in consequence could result, the overall risk is reduced.	Controls based on legislative requirements – must be adopted.	Yes C 11.1
Good Practice				
Bunkering equipment controls: <ul style="list-style-type: none"> • all hoses that have a potential environmental risk following damage or failure shall be placed on the vessel's preventative maintenance system. • all bulk transfer hoses shall be pressure rated at purchase • there shall be dry-break couplings and flotation on fuel hoses • there shall be an adequate number of appropriately 	F: Yes CS: Minimal cost. Standard practice.	Reduces the likelihood of a spill occurring. Although no significant reduction in consequence could result, the overall risk is reduced.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 11.2

¹³ Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹³	Benefit/Reduction in Impact	Proportionality	Control Adopted
stocked, located and maintained spill kits.				
<p>Ensure Contractor procedures include requirements to be implemented during bunkering/refuelling operations, including:</p> <ul style="list-style-type: none"> • a completed Permit to Work and/or JSA shall be implemented for the hydrocarbon bunkering/refuelling operation • gauges, hoses, fittings and the sea surface shall be visually monitored during the operation • hoses shall be visually inspected as per vessel procedures prior to commencement • bunkering/refuelling will commence in daylight hours. If the transfer is to continue into darkness, the JSA risk assessment must consider lighting and the ability to determine if a spill has occurred • hydrocarbons shall not be transferred in marginal weather conditions. 	<p>F: Yes CS: Minimal cost. Standard practice.</p>	<p>Reduces the likelihood of a spill occurring. Although no significant reduction in consequence could result, the overall risk is reduced.</p>	<p>Benefits outweigh cost/sacrifice. Control is also standard practice.</p>	<p>Yes C 11.3</p>
Mitigation: Oil spill response.	Refer to Appendix D.			

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹³	Benefit/Reduction in Impact	Proportionality	Control Adopted
Professional Judgement – Eliminate				
Seismic vessel brought into port to refuel.	F: No. Does not eliminate the fuel transfer risk. It is not operationally practical to transit the seismic vessel back to port for refuelling, based on the frequency of the refuelling requirements and distance from the nearest port (Port Hedland >500 km). CS: Significant due to schedule delay and vessel transit costs and day rates.	Eliminates the risk in the Operational Area; however, moves risk to another location. Therefore, no overall benefit.	Disproportionate. The cost/sacrifice outweighs the benefit gained.	No
Professional Judgement – Substitute				
None identified				
Professional Judgement – Engineered Solution				
None identified.				
Risk Based Analysis				
A quantitative spill risk assessment was undertaken (see details above).				
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type, Woodside considers the adopted controls appropriate to manage the impacts and risks of a bunkering spill. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
Loss of hydrocarbons to marine environment during bunkering has been evaluated as having a low current risk rating that is unlikely to result in potential impact greater than minor and temporary exceedance over national/international water quality standards and a localised, minor and temporary disruption to a small proportion of the population and no impact on critical habitat or activity of protected species. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice. As demonstrated in Section 6.8 , the residual risk of unplanned hydrocarbon release from bunkering is not inconsistent with the relevant objectives and actions of any applicable recovery plans or threat abatement plans, based on the adopted controls. Regard has been given to relevant conservation advice and wildlife conservation plans during the assessment of potential risks. The potential impacts and risks are considered broadly acceptable if the adopted controls are implemented.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 11 No unplanned loss of hydrocarbons to the marine environment from bunkering greater	C 11.1 Marine Order 91 (marine pollution prevention – oil) 2014, requires SOPEP/SMPEP (as appropriate to vessel class).	PS 11.1 Appropriate initial responses prearranged and drilled in case of a hydrocarbon spill, as appropriate to vessel class.	MC 11.1.1 Marine Assurance records demonstrate compliance with Marine Order 91.

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Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
than a consequence level E ¹⁴ during the Petroleum Activities Program.	C 11.2 Bunkering equipment controls: <ul style="list-style-type: none"> all hoses that have a potential environmental risk following damage or failure shall be placed on the vessel's preventative maintenance system all bulk transfer hoses be pressure rated at purchase there shall be dry-break couplings and flotation on fuel hoses there shall be an adequate number of appropriately stocked, located and maintained spill kits. 	PS 11.2.1 Damaged equipment is replaced prior to failure.	MC 11.2.1 Records confirm the vessel bunkering equipment is subject to systematic integrity checks as per vessels preventative maintenance schedule.
		PS 11.2.2 Minimised inventory loss in the event of a failure.	MC 11.2.2 Records confirm presence of dry break couplings and flotation on fuel hoses and are pressure rated.
		PS 11.2.3 Ensure adequate resources are available to allow implementation of the SOPEP.	MC 11.2.3 Records confirm presence of spill kits.
	C 11.3 Ensure Contractor procedures include requirements to be implemented during bunkering/refuelling operations, including: <ul style="list-style-type: none"> a completed Permit to Work and/or JSA shall be implemented for the hydrocarbon bunkering/refuelling operation gauges, hoses, fittings and the sea surface shall be visually monitored during the operation hoses shall be visually inspected as per vessel procedures prior to commencement bunkering/refuelling will commence in daylight hours. If the transfer is to continue into darkness, the JSA risk assessment must consider lighting and the ability to determine if a spill has occurred hydrocarbons shall not be transferred in 	PS 11.3 Compliance with Contractor procedures for managing bunkering/refuelling operations.	MC 11.3.1 Records demonstrate bunkering/refuelling undertaken in accordance with contractor bunkering procedures.

¹⁴ Defined as 'Slight, short-term impact (< 1 year) on species, habitat (but not affecting ecosystem function), physical or biological attributes'.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	marginal weather conditions.		
Detailed oil spill preparedness and response performance outcomes, standards and measurement criteria for the Petroleum Activities Program are presented in Appendix D .			

6.7.4 Unplanned Discharge: Deck Spills

Context														
Project Vessels – Section 3.5.5			Physical Environment – Section 4.4 Biological Environment – Section 4.5					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socio-Economic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Accidental discharge of hydrocarbons/chemicals from Project vessel deck activities and equipment (e.g. cranes and winches) within the Operational Area			x			x		A	F	2	L	LCS GP	Broadly Acceptable	EPO 12
Description of Source of Risk														
<p>Deck spills can result from spills from stored hydrocarbons/chemicals or equipment. Project vessels typically store hydrocarbon/chemicals in various volumes. Storage areas are typically set up with effective primary and secondary bunding to contain any deck spills. Releases from equipment are predominantly from the failure of hydraulic hoses, which can either be located within bunded areas or outside of bunded or deck areas (e.g. over water on cranes).</p> <p>Woodside's operational experience demonstrates that spills are most likely to originate from hydraulic hoses and have been less than 100 L, with an average volume <10 L.</p>														
Consequence Assessment														
Potential Impacts to Environmental Value(s)														
<p>No significant impacts from the accidental discharges described are anticipated in the offshore/open water locations of the Operational Area, because of the minor quantities involved (<10 L), the limited duration of vessel activities during the Petroleum Activities Program (up to 80-days), and high level of dilution into the open water marine environment of the Operational Area. The biological consequences of such a small volume spill on identified open water sensitive receptors relate to a minor potential for toxicity impacts to plankton and fish populations (surface and water column biota) and localised reduction in water quality within a small spill affected area. No impacts are predicted to benthic habitat communities in the Operational Area.</p>														
Summary of Potential Risks and Impacts to Environmental Value(s)														
<p>Given the adopted controls, it is considered that minor hydrocarbon/harmful chemical spills to the marine environment will not result in a potential impact to water quality greater than localised contamination above background levels, quality standards or known effect concentrations, and will not result in a potential impact greater than localised and temporary disruption to a small proportion of the population with no impact on critical habitat or activity.</p>														

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Marine Order 91 (marine pollution prevention—oil) 2014, requires Shipboard Oil Pollution Emergency Plan (SOPEP) (as appropriate to vessel class).	F: Yes. CS: Minimal cost. Standard practice.	Legislative requirements to be followed reduce the likelihood of an unplanned release. The consequence is unchanged.	Controls based on legislative requirements – must be adopted.	Yes C 11.1
Good Practice				
Bulk chemical and fuel storage areas are bunded or secondarily contained when they are not being handled/moved temporarily	F: Yes. CS: Minimal cost. Standard practice.	Reduces the likelihood of contaminated deck drainage water being discharged to the marine environment.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 12.1
Maintain and locate spill kits in close proximity to hydrocarbon storage areas and deck areas for use to contain and recover deck spills.	F: Yes. CS: Minimal cost. Standard practice.	Reduces the likelihood of a deck spill from entering the marine environment. The consequence is unchanged.	Benefits outweigh cost/sacrifice.	Yes C 12.2
Professional Judgement – Eliminate				
None identified.				
Professional Judgement – Substitute				
None identified				
Professional Judgement – Engineered Solution				
Below-deck storage of all hydrocarbons and chemicals.	F: Not feasible. During operations there is a need to keep small volumes near activities and within equipment requiring use of hydrocarbons and chemicals and can result in increased risk of leaks from transfers via hose or smaller containers. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
A reduction in the volumes of chemicals and hydrocarbons stored onboard the vessel.	F: Yes. Increases the risks associated with transportation and lifting operations. CS: Project delays if required chemicals not on board. Increases the risks associated with transportation and lifting operations.	No reduction in likelihood or consequence since chemicals will still be required to enable activities to occur.	Disproportionate. The cost/sacrifice outweighs the benefit gained.	No

¹⁵ Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹⁵	Benefit/Reduction in Impact	Proportionality	Control Adopted
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts and risks of the potential unplanned accidental deck spills described above. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The risk assessment has determined that an unplanned minor discharge of hydrocarbons/chemicals as a result of minor deck spills represents a low current risk rating that is unlikely to result in potential impact greater than localised and temporary disruption to a small proportion of the population and no impact on critical habitat or activity. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are consistent with the most relevant regulatory guidelines and good oil-field practice/industry best practice. The potential impacts and risks are considered acceptable if the adopted controls are implemented. Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks of minor unplanned deck spills to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 12 No unplanned spills to the marine environment from deck activities greater than a consequence level of F ¹⁶ during the Petroleum Activities Program.	C 11.1 Section 6.7.3	PS 11.1 Section 6.7.3	MC 11.1.1 Section 6.7.3
	C 12.1 Liquid chemical and fuel storage areas are banded or secondarily contained when they are not being handled/moved temporarily.	PS 12.1 Failure of primary containment in storage areas does not result in loss to the marine environment.	MC 12.1.1 Records confirm all bulk chemicals and fuel are stored in banded/secondarily contained areas when not being handled/moved temporarily.
	C 12.2 Maintain and locate spill kits in close proximity to hydrocarbon storage areas and deck areas for use to contain and recover deck spills.	PS 12.2 Spill kits to be available for use to clean up deck spills.	MC 12.2.1 Records confirms spill kits are present, maintained and suitably stocked.

¹⁶ Defined as 'No lasting effect (<1 month). Localised impact not significant to environmental receptor'.

6.7.5 Unplanned Discharge: Loss of Solid Hazardous and Non-Hazardous Wastes (including Dropped Objects)

Context														
Activity Components – Section 3.5			Physical Environment – Section 4.4 Biological Environment – Section 4.5					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Accidental loss of hazardous or non-hazardous wastes (including dropped objects) to the marine environment (excludes sewage, grey water, putrescible waste and bilge water).			X		X	X		A	F	1	L	LC SS GP	Broadly Acceptable	EPO 13
Description of Source of Impact														
<p>The project vessels will generate a variety of solid wastes including packaging and domestic wastes such as aluminium cans, bottles, paper and cardboard. Hence, there is the potential for solid wastes to be lost overboard to the marine environment. Wastes on-board are managed in accordance with the on-board waste management plan. Some wastes may be incinerated. Based on industry experience, waste items lost overboard are typically wind-blown rubbish such as container lids, cardboard etc. Such losses typically have occurred during back loading activities, periods of adverse weather and incorrect waste storage.</p>														

Consequence Assessment
<p>Potential Impacts to Environmental Values</p> <p>The potential impacts of solid wastes accidentally discharged to the marine environment include direct pollution and contamination of the environment and secondary impacts relating to potential contact of marine fauna with wastes, resulting in entanglement or ingestion and leading to injury and death of individuals. Several migratory and threatened species were identified as occurring within the Operational Area, including cetaceans, marine turtles and sharks. However, these species are expected to be transient as there are no known key aggregation areas within the Operational Area. The temporary or permanent loss of waste materials into the marine environment is highly unlikely to have a significant environmental impact, based on the types, size and frequency of wastes that could occur during the limited time the vessels will be in the Operational Area and the transient nature of the species present. Given this, impacts will have no lasting effect on any habitat, species or water quality.</p>
<p>Summary of Potential Risks and Impacts to Environmental Values(s)</p> <p>Given the adopted controls, it is considered that the accidental discharge of solid waste described will result in localised impacts not significant to environmental receptors, with no lasting effect.</p>

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹⁷	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Marine Order 95 – marine pollution prevention—garbage (as appropriate to vessel class), prescribes matters necessary to give effect to Annex V of MARPOL, which prohibits the discharge of all garbage into the sea, except as provided otherwise.	F: Yes. CS: Minimal cost. Standard practice.	Legislative requirements to be followed reduces the likelihood of an unplanned release. The consequence is unchanged.	Controls based on legislative requirements – must be adopted.	Yes C 13.1
Good Practice				
Project Vessel Waste Management Plan, which requires: <ul style="list-style-type: none"> dedicated waste segregation bins records of all waste to be disposed, treated or recycled waste streams to be handled and managed according to their hazard and recyclability class. 	F: Yes. CS: Minimal cost. Standard practice.	Reduces the likelihood of an unplanned release. The consequence is unchanged.	Benefit outweighs cost sacrifice.	Yes C 13.2
Lost waste/dropped objects will be recovered, where safe and practicable. Where safe and practicable for this activity, will consider: <ul style="list-style-type: none"> risk to personnel to retrieve object whether the location of the object is in recoverable water depths object's proximity to subsea infrastructure ability to recover the object (i.e. nature of object, lifting equipment and suitable weather). 	F: Yes, however it may not always be practicable. Assessed on a case by case situation. CS: Minimal cost. Standard practice.	No reduction in likelihood, as this is an unplanned event. Since the equipment may be recovered, a reduction in consequence is possible.	Benefit outweighs cost sacrifice.	Yes C 13.3
Professional Judgement – Eliminate				
None identified.				

¹⁷ Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹⁷	Benefit/Reduction in Impact	Proportionality	Control Adopted
Professional Judgement – Substitute				
None identified.				
Professional Judgement – Engineered Solution				
None identified.				
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts and risks of accidental discharges of waste. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The impact assessment has determined that, given the adopted controls, accidental discharge of solid waste represents a low current risk rating that is unlikely to result in a potential impact above localised, not significant to environmental receptors with no lasting effects. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice and meet legislative requirements (Marine Order 95). Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks of these discharges to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 13 No unplanned releases of solid hazardous or non-hazardous waste to the marine environment greater than a consequence level of F ¹⁸ during the Petroleum Activities Program.	C 13.1 Marine Order 95 – marine pollution prevention—garbage (as appropriate to vessel class), prescribes matters necessary to give effect to Annex V of MARPOL, which prohibits the discharge of all garbage into the sea, except as provided otherwise.	PS 13.1 Project vessels compliant with Marine Order 95.	MC 13.1.1 Records demonstrate project vessels are compliant with Marine Order 95.
	C 13.2 Project Vessel Waste Management Plan, which requires: <ul style="list-style-type: none"> • dedicated waste segregation bins • records of all waste to be disposed, treated or recycled • waste streams to be handled and managed according to their hazard and recyclability class. 	PS 13.2 Waste will be managed in accordance with the project vessel waste arrangements.	MC 13.2.1 Records demonstrate compliance against project vessel waste arrangements.
	C 13.3	PS 13.3	MC 13.3.1

¹⁸ Defined as 'No lasting effect (<1 month). Localised impact not significant to environmental receptor'.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	<p>Lost waste/dropped objects will be recovered, where safe and practicable.</p> <p>Where safe and practicable for this activity, will consider:</p> <ul style="list-style-type: none"> • risk to personnel to retrieve object • whether the location of the object is known or is in recoverable water depths and feasible to do so • object's proximity to subsea infrastructure • ability to recover the object (i.e. nature of object, lifting equipment and suitable weather). 	<p>Waste dropped to the marine environment will be recovered where safe and practicable to do so.</p>	<p>Records detail the recovery attempt consideration and status of any waste lost to the marine environment.</p>

6.7.6 Physical Presence: Vessel Collision / Entanglement with Marine Fauna

Context														
Project Vessels – Section 3.5.5				Biological Environment – Section 4.5				Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted						Evaluation							
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Accidental collision between project vessels and threatened and/or migratory marine fauna within the Operational Area.						x		A	E	1	L	LCS GP	Broadly Acceptable	EPO 14
Entanglement of threatened and/or migratory marine fauna with towed seismic equipment within the Operational Area.						x								
Description of Source of Risk														
<p>Project Vessels</p> <p>The project vessels operating in and around the Operational Area may present a potential hazard to cetaceans and other protected marine fauna such as marine reptiles. Vessel movements can result in collisions between the vessel (hull and propellers) and marine fauna, potentially resulting in superficial injury, serious injury that may affect life functions (e.g. movement and reproduction) and mortality. The factors that contribute to the frequency and severity of impacts due to collisions vary greatly due to vessel type, vessel operation (specific activity, speed), physical environment (e.g. water depth) and the type of animal potentially present and their behaviours.</p> <p>The seismic vessel will be advancing at low speeds around 4–5 knots (7–9 km) during seismic acquisition. The support vessel(s) generally travel at higher speeds.</p> <p>Seismic Equipment</p> <p>The seismic vessel will tow seismic geophysical and associated equipment (comprising the acoustic source, header buoys, starboard and port deflectors or baravanes, streamers and tail buoys) within the Operational Area. The seismic vessel may tow up to 14 streamers that could extend approximately 8 km behind the seismic vessel. The streamer(s) will be towed at a depth of approximately 15–25 m. The seismic source will be towed at a depth of approximately 6 to 8 m (± 1 m).</p> <p>The seismic equipment has the potential to present an entrapment/entanglement risk to marine fauna (in particular marine turtles). Anecdotally, there has been no reported cases of marine fauna becoming entangled in seismic equipment in Australian waters.</p>														

Consequence Assessment
Potential Impacts to Environmental Values
Vessel disturbance is a key threat to a number of migratory and threatened species identified as occurring within Operational Area, including cetaceans and marine turtles. Relevant conservation actions outlined in these plans are listed in Section 6.8 .

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Consequence Assessment

Cetaceans

Cetaceans are naturally inquisitive marine mammals. The reaction of cetaceans to the approach of a vessel is quite variable. Some species remain motionless when close to a vessel, while others are known to be curious and often approach ships that have stopped or are slow moving, although they generally do not approach and sometimes avoid faster moving ships (Richardson et al., 1995). The Whale and Dolphin Conservation Society (WDCS, 2006) indicates that some cetacean species, such as humpback whales can detect and change course to avoid a vessel.

Collisions between vessels and marine mammals occur more frequently in areas where high vessel traffic and important habitat coincide (WDCS, 2006). In Australia, the majority of vessel strikes to known species involved humpback, southern right whale and sperm whales, in descending order (Peel et al., 2016). Van Warebeek et al. (2007) report just five blue whale ship strikes in the Southern Hemisphere. No vessel strike collisions were reported in the Northern coast of Australia (Peel et al., 2016). The behaviour exhibited by whales prior to vessel collision varies, with some reported as being asleep/unmoving prior to the collision (Peel et al., 2016) and others displaying a 'last-second flight response' (Laist et al., 2001). Individual cetaceans engaged in behaviours such as feeding, mating or nursing may also be more vulnerable to vessel collisions when distracted by these activities (DoEE, 2017b).

The likelihood of vessel/whale collision being lethal is influenced by vessel speed—the greater the speed at impact, the greater the risk of mortality (Jensen and Silber, 2004; Laist et al., 2001). Vanderlaan and Taggart (2007) found that the chance of lethal injury to a large whale as a result of a vessel strike increases from about 20% at 8.6 knots to 80% at 15 knots. Project vessels within the Operational Area are likely to be travelling <8 knots, therefore, the chance of a vessel collision with protected species resulting in a lethal outcome is considered unlikely, as fauna can move away from project vessels.

The Operational Area does not overlap with any cetacean BIAs or critical habitat. Due to the proximity of a pygmy blue whale migration BIA approximately 14 km south-east of the Operational Area, and also the recorded presence of a tagged whale within the south east corner of the Operational Area (**Section 4.6.3**), it is possible the pygmy blue whale may occur within the Operational Area during their northern migration from April to July, and during their southern migration from October to January. However, the presence of all cetacean species, including the pygmy blue whale, is likely to be limited to infrequent occurrences of individuals or small groups.

According to the data of Vanderlaan and Taggart (2007), it is estimated that the risk of lethal injury to a large whale as a result of a vessel strike is less than 10% at a speed of 4 knots. Vessel-whale collisions at this speed are uncommon and based on reported data contained in the NOAA database (Jensen and Silber, 2004) there only two known instances of collisions when the vessel was travelling at less than 6 knots; both of these were from whale-watching vessels that were deliberately positioned amongst whales. Given the duration of activities within the Operational Area and the slow speeds at which project vessels operate, collisions with cetaceans such as pygmy blue whales are considered highly unlikely.

Marine Turtles

Marine turtles are at potential risk from vessel strike and entanglement with towed seismic equipment. Hazel and Gyuris (2006) reviewed vessel strike data from 1999-2002 on the Queensland east coast and found that during that period at least 65 turtles were killed annually as a result of collisions with vessels. Green turtles, followed by loggerhead turtles comprised the majority of vessel related records, and 72% of cases were adult or sub-adult turtles (Hazel and Gyuris, 2006). In Australian waters, all species of marine turtle have been involved in vessel strikes (DoEE, 2016).

The effect of vessel speed and turtle flee response can be significant. A study by Hazel et al. (2007) found that 60% of green turtles fled from vessels travelling at 2.2 knots (4 km/h) while only 4% fled from vessels travelling at 10.2 knots (19 km/h). When fleeing 75% of turtles moved away from the vessel's track, 8% swam along the vessel track and 18% crossed in front of the vessel. The study concluded that most turtles would be unlikely to avoid vessels travelling at speeds greater than around 2.2 knots (Hazel et al., 2007; DoEE, 2017a). Furthermore, the relatively small size of turtles and the significant time spent below the surface makes their observation by vessel operators extremely difficult or impossible. Green turtles observed by Hazel et al. (2009) generally only exposed the dorsal-anterior part of the head above the surface of the water and never for longer than two seconds.

There is no published literature on marine turtle entanglement with seismic equipment during seismic surveys, however Nelms et al. (2016) state that they received anecdotal reports of turtle entrapments in tail buoys and airgun strings during several offshore seismic surveys off the west coast of Africa. Additionally, there is evidence of marine turtles becoming entangled in discarded seismic cable (Duncan et al., 2017).

There are no BIAs or Habitat Critical to the survival of marine turtles within the Operational Area. Due to the absence of potential nesting habitat and location offshore, the Operational Area is unlikely to represent important habitat for marine turtles. The occurrence of all species of marine reptiles within the Operational Area is expected to be limited to infrequent occurrences of transitory individuals. Given the duration of activities within the Operational Area and the slow speeds at which project vessels operate, collisions or entanglement with transiting marine turtles are considered highly unlikely.

Consequence Assessment
Summary of Potential Risks and Impacts to Environmental Value(s)
The assessment of vessel collision with marine fauna has considered the potential risks to pygmy blue whales. If the Petroleum Activities Program overlaps with the northbound or southbound migration, individuals may deviate slightly due to the presence of vessels, but will continue on their migration unhindered. Vessel collisions with pygmy blue whales are highly unlikely to occur, given the very slow vessel speeds and presence of MFOs. This is not inconsistent with the the BWCMP (Table 6-21) (Action Area 4. Given the adopted controls, it is considered that if a collision or entanglement were to occur, it will not result in a potential impact greater than slight, short-term impact on the species (i.e. Environment Impact – E).

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹⁹	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans, including the following measures ²⁰ : <ul style="list-style-type: none"> • Project vessels will not travel faster than six knots within 300 m of a cetacean or turtle (caution zone) • Project vessels will not approach closer than 50 m for a dolphin or turtle and/or 100 m for a whale (with the exception of animals bowriding). • If the cetacean or turtle shows signs of being disturbed, project vessels will immediately withdraw from the caution zone at a constant speed of less than six knots. • Vessels will not travel faster than eight knots within 250 m of a whale shark and not allow the vessel to approach closer than 30 m of a whale shark. Exception: the above requirement does not apply to project vessels operating under limited/constrained manoeuvrability including but not limited to seismic vessel towing equipment and acquiring data, and in the event of an emergency.	F: Yes. CS: Minimal cost. Standard practice.	Implementation of these controls will reduce the likelihood of a collision between a cetacean, whale shark or turtle occurring. The consequence of a collision is unchanged.	Controls based on legislative requirements – must be adopted.	Yes C 14.1

¹⁹ Qualitative measure

²⁰For safety reasons, the distance requirements below are not applied for a vessel holding station or with limited manoeuvrability; e.g. loading, back-loading, bunkering, close standby cover for overside working and emergency situations.

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)¹⁹	Benefit/Reduction in Impact	Proportionality	Control Adopted
Good Practice				
Fit streamer tail buoys with appropriate turtle guards, or use a design that does not represent an entanglement risk for turtles.	F: Yes. CS: Minimal cost. Standard practice.	Implementing this control will reduce the likelihood of turtle entanglement.	Benefits outweigh cost/sacrifice. Control is also standard practice.	Yes C 14.2
Professional Judgement – Eliminate				
Eliminate use of vessels.	F: No. The use of vessels is required to conduct the Petroleum Activities Program. CS: Not considered – control not feasible.	Not considered – control not feasible.	Not considered – control not feasible.	No
Professional Judgement – Substitute				
The use of dedicated MFOs on support vessel(s) for the duration of the Petroleum Activities Program to watch for cetaceans and marine turtles and provide direction on and monitor compliance with Part 8 of the EPBC Regulations.	F: Yes. Vessel bridge crews already maintain a constant watch during operations, and crew complete specific cetacean observation training. CS: Additional cost of MFOs considered unnecessary.	Given support vessel bridge crews already maintain a constant watch during operations, additional MFOs would not significantly further reduce the risk.	Grossly disproportionate. Implementation of the control requires considerable cost sacrifice for minimal environmental benefit.	No
Professional Judgement – Engineered Solution				
Manage Vessel speed to reduce likelihood of interaction with marine fauna	F: Yes. CS: Good practice	There is an established relationship between the likelihood of vessel strikes to whales and the speed of the vessel. However, the Operational Area does not overlap with any cetacean BIAs or critical habitat and the presence of marine fauna is likely to be limited to infrequent occurrences of individuals or small groups. Therefore, there is no further risk reduction from the application of this control.	Given the slow speeds at which vessels operate, the likely presence of marine fauna in the Operational Area and the controls currently in place (C14.1) the adoption of this control offers no further reduction in risk.	No
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts and risks of potential vessel collision/entanglement with protected marine fauna. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

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Demonstration of Acceptability

Acceptability Statement

The impact assessment has determined that, given the adopted controls, vessel collision/entanglement with marine fauna represents a low risk rating that is unlikely to result in a potential impact to fauna greater than slight and short term, with no population-level effects. Further opportunities to reduce the impacts and risks have been investigated above. Impacts to cetaceans from vessel strikes was raised during stakeholder consultation and were considered in the finalisation of the EP to clarify potential impacts.

The adopted controls are considered good oil-field practice/industry best practice and meet the requirements of Part 8 (Division 8.1) of the EPBC Act Regulations 2000. The residual risk of vessel collision with marine fauna is not inconsistent with the relevant objectives and actions of any applicable recovery plans or threat abatement plans including the BWCMP (*Ensure the risk of vessel strikes on blue whales is considered when assessing actions that increase vessel traffic in areas where blue whales occur and, if required, appropriate mitigation measures are implemented* - refer to **Section 6.8**), based on the adopted controls. Regard has been given to relevant conservation advice during the assessment of potential risks. Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks of vessel collision with marine fauna to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria

Outcomes	Controls	Standards	Measurement Criteria
EPO 14 No vessel strikes with marine fauna (whales, whale sharks and turtles) during the Petroleum Activities Program.	C 14.1 EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans, including the following measures ²¹ : <ul style="list-style-type: none"> Project vessels will not travel faster than six knots within 300 m of a cetacean or turtle (caution zone). Project vessels will not approach closer than 50 m for a dolphin or turtle and/or 100 m for a whale (with the exception of animals bowriding). If the cetacean or turtle shows signs of being disturbed, project vessels will immediately withdraw from the caution zone at a constant speed of less than six knots. Vessels will not travel faster than eight knots within 250 m of a whale shark and not allow the vessel to approach closer than 30 m of a whale shark. Exception: The above requirement does not apply to project vessels operating under limited/constrained manoeuvrability including but not limited to seismic vessel towing equipment and acquiring data, and in the event of an emergency.	PS 14.1 Compliance with EPBC Regulations 2000 – Part 8 Division 8.1 (Regulation 8.05 and 8.06) Interacting with cetaceans to minimise potential for vessel strike and application of these regulation to whale sharks and marine turtles.	MC 14.1.1 Records demonstrate no breaches of EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans and application of these regulations to whale sharks and marine turtles.
		PS 14.1.2 All vessel strike incidents with cetaceans will be reported in the National Ship Strike Database (as outlined in the Conservation Management Plan for the Blue Whale—A Recovery Plan under the EPBC Act 1999, Commonwealth of Australia, 2015).	MC 14.1.2 Records demonstrate reporting cetacean ship strike incidents to the National Ship Strike Database.

²¹For safety reasons, the distance requirements below are not applied for a vessel holding station or with limited manoeuvrability; e.g. loading, back-loading, bunkering, close standby cover for overside working and emergency situations.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	C 14.2 Fit streamer tail buoys with appropriate turtle guards, or use a design that does not represent an entanglement risk for turtles.	PS 14.2 Streamer tail-buoys to have appropriate turtle guards, or will be of a design that does not represent an entanglement risk for turtles.	MC 14.2.1 Records confirm that turtle guards have been fitted appropriately (or are not necessary due to design of tail-buoys).

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6.7.7 Physical Presence: Loss of Equipment

Context														
Activity Components – Section 3.5			Biological Environment – Section 4.5 Socio-Economic Environment – Section 4.10					Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted						Evaluation							
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socio-Economic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Physical loss of seismic equipment (i.e. streamers, acoustic source).					x		x	A	F	2	L	LCS GP	Broadly Acceptable	EPO 15
Description of Source of Risk														
<p>The Petroleum Activities Program will be conducted using a single purpose-built seismic vessel. The seismic vessel will tow seismic equipment (comprising the acoustic source, header buoys, starboard and port spreaders or vanes, streamers and tail buoys). The seismic vessel may tow up to 14 streamers, approximately 8000 m in length, towed approximately 500 m behind the seismic vessel and, therefore, extending approximately 8.5 km behind the vessel. The streamer(s) will be towed at a depth of approximately 15–25 m. The seismic source will be towed at a depth of approximately 6 to 8 m. The streamers will be fitted with streamer recovery devices (SRDs) that will automatically deploy inflatable air bags to raise the streamer to the surface for retrieval.</p> <p>Loss of this equipment has the potential to cause minor physical damage to seabed and benthic communities, and temporary disturbance to marine users (i.e. commercial fishers).</p>														

Consequence Assessment
Potential Impacts to Environmental Values
<p>Benthic Habitat and Communities</p> <p>In the unlikely event of loss of seismic equipment during the Petroleum Activities Program, potential environmental effects would be limited to physical impacts to the seabed and benthic communities. During normal operations, it is considered highly unlikely for streamers to sink and impact the seabed, given the tow depth of streamers (~15–25 m) and the application of depth control built into the design (SRDs).</p> <p>The Operational Area is expected to consist primarily of fine grain, soft sediments. The seabed is likely to be inhabited by a low abundance of filter feeders (primarily echinoderms) and other epifauna and infauna. The Operational Area lies within the Exmouth Plateau KEF. This KEF is generally an area of low habitat heterogeneity, however, it is likely to be an important area of biodiversity as it provides an extended area offshore for communities adapted to depths of around 1000 m (DOEE, n.d.).</p> <p>Additionally, the Operational Area overlaps entirely with the Northwest Province, which typically supports a low abundance, richness and diversity of benthic communities (Heyward et al., 2001).</p> <p>Given the size of seismic equipment, only a relatively small area of the seabed would be disturbed and no lasting impacts to benthic habitats are expected.</p> <p>Commercial Fisheries and Other Marine Users</p> <p>In the unlikely event that equipment is lost, any commercial fisheries and/or other marine users of the Operational Area may be required to make minor diversions to avoid the equipment, until it can be retrieved (if possible). The</p>

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potential for such interactions will be limited to a short period of time while the equipment is retrieved (if possible). Should disruption occur, it is expected to affect individual users and cause a temporary disruption through avoidance of a highly localised area. Given the nature and size of the equipment to be used during the survey, lost equipment may result in a minor navigational hazard. Therefore, anticipated impacts are expected to be low.

Summary of Potential Risks and Impacts to Environmental Value(s)

Given the adopted controls, it is considered that a loss of seismic equipment (i.e. seismic streamers, acoustic source to the seabed) will not result in a potential impact greater than localised disruption to a small area of the seabed, a small portion of the benthic population and no impact on critical habitat or activity.

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)²²	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Comply with Marine Order 21 (safety and emergency arrangements) 2016, including: <ul style="list-style-type: none"> • adherence to minimum safe manning levels • maintenance of navigation equipment in efficient working order (compass/radar) • navigational systems and equipment required are those specified in Regulation 19 of Chapter V of SOLAS • AIS that provides other users with information about the vessel's identity, type, position, course, speed, navigational status and other safety-related data. 	F: Yes. CS: Minimal cost. Standard practice.	Legislative requirement to reduce the likelihood of interference with other marine users resulting in a collision.	Controls based on legislative requirements – must be adopted	Yes C 15.1
Good Practice				
Deploy, retrieve and operate streamers as per predetermined procedures, including: <ul style="list-style-type: none"> • Streamers will only be deployed in suitable sea state in accordance with contractors Matrix of Permitted 	F: Yes. CS: Minimal cost. Standard practice.	Implementing this control will reduce the likelihood of equipment loss. The consequence is unchanged.	Benefit outweighs cost/ sacrifice.	Yes C 15.2

²² Qualitative measure

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)²²	Benefit/Reduction in Impact	Proportionality	Control Adopted
Operations (MOPO) or similar.				
Streamers fitted with steering devices in the form of remote controlled wings/fins, and real-time monitoring equipment.	F: Yes. CS: Minimal cost. Standard practice.	Implementing this control will reduce the likelihood of equipment loss. The consequence is unchanged.	Benefit outweighs cost/ sacrifice.	Yes C 15.3
Activate pressure-activated SRDs within streamers in the event of loss, to bring the equipment to the surface.	F: Yes. CS: Minimal cost. Standard practice.	Implementing this control will reduce the likelihood of equipment loss. The consequence is unchanged.	Benefit outweighs cost/ sacrifice.	Yes C 15.4
Lost equipment will be recovered, where safe and practicable. Where safe and practicable for this activity, will consider: <ul style="list-style-type: none"> risk to personnel to retrieve object whether the location of the equipment is known or in recoverable water depths equipment's proximity to subsea infrastructure ability to recover the equipment (i.e. nature of equipment, lifting equipment and suitable weather). 	F: Yes, however it may not always be practicable. Assessed on a case by case situation. CS: Minimal cost. Standard practice.	No reduction in likelihood, as this is an unplanned event. Since the equipment may be recovered, a reduction in consequence is possible.	Benefit outweighs cost/ sacrifice.	Yes C 15.5
Professional Judgement – Eliminate				
None identified.				
Professional Judgement – Substitute				
Use modified short marine towed streamer(s) (approximately 1.5 to 3 km in length).	F: No. CS: Shorter streamers result in a significant loss of data, especially in deeper waters, and would not enable the survey to image the target depth below mudline.	Not considered – control not feasible.	Not considered – control not feasible.	No
Professional Judgement – Engineered Solution				
None identified.				

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)²²	Benefit/Reduction in Impact	Proportionality	Control Adopted
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the impacts and risks to benthic communities from the loss of seismic equipment to the seabed. As no reasonable additional/alternative controls were identified that would further reduce the impacts and risks without grossly disproportionate sacrifice, the impacts and risks are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The impact assessment has determined that, given the adopted controls, potential loss of seismic equipment to the seabed represent a consequence to benthic community/habitat structure limited to no lasting effect. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice. Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks to marine sediment from loss of seismic equipment to an acceptable level.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 15 No loss of seismic equipment (i.e. streamers, acoustic source) with a consequence level greater than F ²³ for the duration of the Petroleum Activities Program.	C 15.1 Comply with Marine Order 21 (safety and emergency arrangements) 2020, including: <ul style="list-style-type: none"> adherence to minimum safe manning levels maintenance of navigation equipment in efficient working order (compass/radar) navigational systems and equipment required are those specified in Regulation 19 of Chapter V of SOLAS ALS that provides other users with information about the vessel's identity, type, position, course, speed, navigational status and other safety-related data. 	PS 15.1 Project vessels compliant with Marine Order 21 (safety of navigation and emergency procedures) 2016.	MC 15.1.1 Records demonstrate compliance with standard maritime safety procedures (Marine Orders 21 and 30).
	C 15.2 Deploy, retrieve and operate streamers as per predetermined procedures, including: <ul style="list-style-type: none"> Streamers will only be deployed in suitable sea state in accordance with contractors MOPO or similar. 	PS 15.2 Seismic vessel compliance with predetermined procedures on deployment, retrieval and operation of streamers.	MC 15.2.1 Records confirm that seismic vessel hold procedures for streamer deployment, retrieval and operation.
			MC 15.2.2 Daily report demonstrates that streamers were deployed

²³ Defined as 'No lasting effect (<1 month) or negligible impact. Localised impact not significant to environmental receptors.'

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
			in accordance with contractors MOPO.
	<p>C 15.3 Streamers fitted with steering devices in the form of remote controlled wings/fins, and real-time monitoring equipment.</p>	<p>PS 15.3 Ability to control streamer depth and location of streamer in relation to the seabed is known at all times.</p>	<p>MC 15.3.1 Records confirm streamers are fitted with steerable wings/fins, and real-time monitoring equipment.</p>
	<p>C 15.4 Activate pressure-activated SRDs within streamers the event of loss, to bring the equipment to the surface.</p>	<p>PS 15.4 Streamers fitted with SRDs.</p>	<p>MC 15.4.1 Records confirm streamers are fitted with pressure-activated SRDs.</p>
	<p>C 15.5 Lost equipment will be recovered, where safe and practicable. Where safe and practicable for this activity, will consider:</p> <ul style="list-style-type: none"> • risk to personnel to retrieve object • whether the location of the equipment is known or is in recoverable water depths • equipment's proximity to subsea infrastructure • ability to recover the equipment (i.e. nature of equipment, lifting equipment and suitable weather). 	<p>PS 15.5 Lost equipment recovered where safe and practicable to do so.</p>	<p>MC 15.5.1 Records detail the recovery of equipment lost to the marine environment.</p>

6.7.8 Physical Presence: Introduction and Establishment of Invasive Marine Species

Context														
Project Vessels – Section 3.5.5				Physical Environment – Section 4.4 Biological Environment – Section 4.5				Stakeholder Consultation – Section 5						
Impact Evaluation Summary														
Source of Impact	Environmental Value Potentially Impacted							Evaluation						
	Soil and Groundwater	Marine Sediment	Water Quality	Air Quality (incl Odour)	Ecosystems/ Habitat	Species	Socioeconomic	Decision Type	Consequence/Impact	Likelihood	Risk Rating	ALARP Tools	Acceptability	Outcomes
Introduction and establishment of invasive marine species (IMS)					X	X	X	A	D	0	L	LCS GP	Broadly Acceptable	EPO 16
Description of Source of Risk														
<p>During the Petroleum Activities Program, vessels and submersible equipment have the potential to introduce IMS to the Operational Area.</p> <p>Vessels</p> <p>Vessels will be transiting to and from the Operational Area, potentially including traffic mobilising from international waters. There is the potential for project vessels to transfer IMS from either international waters, Australian waters or coastal waters into the Operational Area.</p> <p>All vessels are subject to some level of marine fouling. Organisms attach to the vessel hull, particularly in areas where organisms can find a good attachment surface (e.g. seams, strainers and unpainted surfaces) or where turbulence is lowest (e.g. niches, sea chests, etc.). Commercial vessels typically maintain anti-fouling coatings to reduce the build-up of fouling organisms. Organisms can also be drawn into ballast tanks during on-boarding of ballast water required to maintain safe operating conditions.</p> <p>Project vessels have the potential to introduce IMS to the Operational Area through marine biofouling (containing IMS) on vessels, as well as within high-risk ballast water exchange. Cross-contamination between vessels can also occur (e.g. IMS translocated between project vessels) during times when vessels need to be alongside each other.</p> <p>Submersible Equipment</p> <p>Submersible equipment required for the activity (seismic array) is transported to and used within the Operational Area. There is the potential that this equipment may be used on other projects before being used on this activity. As a consequence, there is the potential for IMS translocation.</p>														

Consequence Assessment
Potential Impacts to Environmental Values
<p>IMS are a subset of Non-Indigenous Marine Species (NIMS) that have been introduced into a region beyond their natural biogeographic range, resulting in impacts to social/cultural, human health, economic and/or environmental values. NIMS are species that have the ability to survive, reproduce and establish founder populations. However, not all NIMS introduced into an area will thrive or cause demonstrable impacts. The majority of NIMS around the world are relatively benign and few have spread widely beyond sheltered ports and harbours. NIMS are only considered IMS when they result in impacts to environmental values and/or have social/cultural, economic and/or human health impacts.</p>

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Consequence Assessment

Once introduced, IMS may prey on local species (which had previously not been subject to this kind of predation and therefore not have evolved protective measures against the attack), they may outcompete indigenous species for food, space or light and can also interbreed with local species, creating hybrids such that the endemic species is lost. These changes to the local marine environment result in changes to the natural ecosystem.

IMS have also proven economically damaging to areas where they have been introduced and established. Such impacts include direct damage to assets (fouling of vessel hulls and infrastructure) and depletion of commercially harvested marine life (e.g. shellfish stocks). IMS have proven particularly difficult to eradicate from areas once established. If the introduction is detected early, eradication may be effective but is likely to be expensive, disruptive and, depending on the method of eradication, harmful to other local marine life.

Potential IMS have historically been introduced and translocated around Australia by a variety of natural and human means, including marine fouling and ballast water. Potential IMS vary from one region to another depending on various environmental factors such as water temperature, salinity, nutrient levels and habitat type, which dictate their survival and invasive capabilities. IMS typically require hard substrate in the photic zone; therefore, requiring shallow waters to become established. Highly-disturbed, shallow-water environments such as shallow coastal waters, ports and marinas are more susceptible to IMS colonisation, whereas IMS are generally unable to successfully establish in deep-water ecosystems and open-water environments where the rate of dilution and the degree of dispersal are high (Williamson and Fitter, 1996; Paulay et al., 2002; Geiling, 2014).

Project vessels and submersible equipment required to undertake the Petroleum Activities Program have the potential to introduce IMS into the Operational Area. Due to the deep water depths (>800 m) and lack of submerged banks/shoals within the Operational Area and surrounding waters, settlement and establishment of IMS is not considered credible. Furthermore, the likelihood is considered remote, given the open-water environment of the Operational Area, distance from shorelines (>200 km) and/or critical habitat and the control measures proposed to be implemented (as outlined below).

Summary of Potential Risks and Impacts to Environmental Value(s)

In support of Woodside's assessment of the risks and consequences of IMS introduction associated with the Petroleum Activities Program, Woodside conducted a risk and impact evaluation of the different aspects of an IMS translocation. The results of this assessment are presented in **Table 6-18**.

As a result of this assessment, Woodside has assessed the potential consequence and likelihood after implementing the identified controls. This assessment concluded that the highest potential consequence is a 'D' and the likelihood is 'Remote' (0), resulting in an overall 'Low' risk.

Table 6-18: Evaluation of risks and impacts from marine pest translocation

IMS Introduction Location	Credibility of Introduction	Consequence of Introduction	Likelihood
Introduced to the Operational Area and establishment on the seafloor.	Not Credible The Operational Area is in deep offshore open waters away from shorelines and/or critical habitat; therefore, they are not conducive to the settlement and establishment of IMS.		
Introduced to the Operational Area and establishment on a project vessel.	Credible There is potential to transfer marine pests between project vessels within the Operational Area	Environment – not credible The translocation of IMS from a colonised project vessel to another vessel via natural dispersion is not credible. This is because of the open-water environment of the Operational Area and distance from shorelines and/or critical habitat. On this basis there is no credible environmental risk. Reputation – D If IMS were on a project vessel, this could potentially impact the vessel operationally through the fouling of intakes and, potentially transfer of an IMS to other support vessels, which would likely result in the quarantine of the vessel until eradication could occur (through cleaning and treatment of	Remote (0) Interactions between project vessels will be limited during the Petroleum Activities Program, with a 3 nm SNA around the seismic vessel, and interactions limited to short periods of time alongside (i.e. during bunkering activities). Spread of marine pests via ballast water in these open ocean environments is not considered credible due to the lack of suitable habitat for

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Consequence Assessment			
		infected areas), which would be costly to perform. Such introduction would be expected to have minor impact to Woodside's reputation, particularly with Woodside's contractors, and would likely have a reputational impact on future proposals.	settlement and establishment.
Transferred between project vessels and from project vessels to other marine environments beyond the Operational Area (i.e. transfer IMS from seismic vessel to a support vessel and then to another environment).	<p>Not Credible</p> <p>The risk is considered so remote that it is not considered credible for the purposes of the activity.</p> <p>As described above, the transfer of IMS between project vessels was already considered remote, given the offshore open ocean environment.</p> <p>Project vessels will be located in an offshore, open ocean environment, where IMS survival is implausible. Furthermore, this marine pest, once transferred, would need to survive on a new vessel that has good hygiene (i.e. has been through Woodside's risk assessment process), and survive the transport back from the Operational Area to shore. If it survived this trip, it would then need conditions conducive to establishing a viable population in nearshore waters to which the infected vessel travels.</p>		

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS) ²⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
Legislation, Codes and Standards				
Project vessels will manage their ballast water using one of the approved ballast water management options, as outlined in the Australian Ballast Water Management Requirements.	F: Yes. CS: Minimal cost. Standard practice.	Reduces the likelihood of transferring marine pests between project vessels within the Operational Area. No change in consequence would occur.	Controls based on legislative requirements under the <i>Biosecurity Act 2015</i> – must be adopted.	Yes C 16.1
Good Practice				
Woodside's IMS risk assessment process ²⁵ will be applied to project vessels and immersible equipment undertaking the Petroleum Activities Program. Assessment will consider these risk factors: For vessels: <ul style="list-style-type: none"> vessel type recent IMS inspection and cleaning history, including for internal niches 	F: Yes. CS: Minimal cost. Good practice implemented across all Woodside Operations.	Identifies potential risks and additional controls implemented accordingly. In doing so, the likelihood of transferring marine pests between project vessels and immersible equipment within the Operational Area is reduced. No change in consequence would occur.	Benefits outweigh cost/sacrifice.	Yes C 16.2

²⁴ Qualitative measure

²⁵ Woodside's IMS risk assessment process was developed with regard to the national biofouling management guidelines for the petroleum production and exploration industry and guidelines for the control and management of a ships' biofouling to minimise the transfer of invasive aquatic species (IMO Guidelines, 2011).

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)²⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
<ul style="list-style-type: none"> • out-of-water period before mobilisation • age and suitability of antifouling coating at mobilisation date • internal treatment systems and history • origin and proposed area of operation • number of stationary/slow speed periods >7 days • region of stationary or slow periods • type of activity – contact with seafloor. <p>For immersible equipment:</p> <ul style="list-style-type: none"> • region of deployment since last thorough clean, particularly coastal locations • duration of deployments • duration of time out of water since last deployment • transport conditions during mobilisation • post-retrieval maintenance regime. <p>Based on the outcomes of each IMS risk assessment, management measures commensurate with the risk (such as treating internal systems, IMS inspections or cleaning) will be implemented to minimise the likelihood of IMS being introduced.</p>				

Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)²⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
Professional Judgement – Eliminate				
Do not discharge ballast water during the Petroleum Activities Program.	F: No. Ballast water discharges are critical for maintain vessel stability. Given the nature of the Petroleum Activities Program, the use of ballast (including the potential discharge of ballast water) is considered to be a safety-critical requirement. CS: Not assessed, control not feasible.	Not assessed, control not feasible.	Not assessed, control not feasible.	No
Eliminate use of vessels including the seismic vessel and support vessel(s).	F. No. Given that vessels must be used to complete the Petroleum Activities Program, there is no feasible means to eliminate the source of risk. CS. Loss of the project.	Not assessed, control not feasible.	Not assessed, control not feasible.	No
Professional Judgement – Substitute				
Source project vessels based in Australia only.	F. Potentially. Limiting activities to only use local project vessels could potentially pose a significant risk in terms of the time and duration of sourcing a vessel, as well as the ability of the local vessel to perform the tasks. While the project will attempt to source support vessels locally, it is not always possible. Availability cannot always be guaranteed. There are limited project vessels based in Australian waters and sourcing Australian-based vessels only will cause increases in cost due to pressures of vessel availability. CS: Significant cost and schedule impacts due to supply restrictions.	Sourcing vessels from within Australia will reduce the likelihood of IMS introduction from outside Australian waters; however, it does not reduce the likelihood of introducing species native to Australia but alien to the Operational Area. It also does not prevent the translocation of IMS that have established elsewhere in Australia. Therefore, the consequence is unchanged.	Disproportionate. Sourcing vessels from Australian waters may result in a slight reduction in the likelihood of introducing IMS to the Operational Area, however it does not completely eliminate the risk. Furthermore, the potential cost of implementing this control could be high, given the potential supply issues associated with only locally sourcing vessels.	No
IMS inspection of all vessels	F: Yes CS. Significant cost and schedule impacts. In addition, Woodside's IMS risk assessment process is seen to be more cost-effective as this control allows Woodside to	Inspection of all vessels for IMS would reduce the likelihood of IMS being introduced to the Operational Area. However, this reduction is unlikely to be significant, given the other control measures	Disproportionate. The cost/sacrifice outweighs the benefit gained, as other controls that are proposed to be implemented	No

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Demonstration of ALARP				
Control Considered	Control Feasibility (F) and Cost/Sacrifice (CS)²⁴	Benefit/Reduction in Impact	Proportionality	Control Adopted
	manage the introduction of IMS through biofouling, while targeting efforts and resources to the areas of greatest concern.	implemented. No change in consequence would occur.	achieve ALARP position.	
Professional Judgement – Engineered Solution				
None identified.				
ALARP Statement				
On the basis of the environmental risk assessment outcomes and use of the relevant tools appropriate to the decision type (i.e. Decision Type A), Woodside considers the adopted controls appropriate to manage the risks and consequences of IMS introduction. As no reasonable additional/alternative controls were identified that would further reduce the risks and consequences without disproportionate sacrifice, the risks and consequences are considered ALARP.				

Demonstration of Acceptability
Acceptability Statement
The impact assessment has determined that, given the adopted controls, introduction of IMS to the Operational Area through ballast water or biofouling on vessels or in-water equipment represents a low residual risk that has a remote likelihood of resulting in a potential impact greater than minor and short term (one to two years) to a small proportion of the benthic community. Further opportunities to reduce the impacts and risks have been investigated above. The adopted controls are considered good oil-field practice/industry best practice. The potential impacts and risks are considered broadly acceptable if the adopted controls are implemented. Therefore, Woodside considers the adopted controls appropriate to manage the impacts and risks of introducing IMS to the Operational Area to a level that is broadly acceptable.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
EPO 16 No introduction and establishment of invasive marine species into the Operational Area as a result of the Petroleum Activities Program.	C 16.1 Project vessels will manage their ballast water using one of the approved ballast water management options, as outlined in the Australian Ballast Water Management Requirements.	PS 16.1 Project vessels will manage ballast water in accordance with Australian Ballast Water Management Requirements.	MC 16.1.1 Ballast Water Records System maintained by vessels which verifies compliance against Australian Ballast Water Management Requirements.
	C 16.2 Woodside's IMS risk assessment process ²⁶ will be applied to project vessels and immersible equipment undertaking the Petroleum Activities Program. Assessment will consider these risk factors: For vessels:	PS 16.2.1 Before entering the Operational Area project vessels and immersible equipment are determined to be low risk ²⁷ of introducing IMS of concern, and maintain this low risk status to mobilisation.	MC 16.2.1 Records of IMS risk assessments maintained for all project vessels and relevant immersible equipment entering the Operational Area or IMS management area to undertake the Petroleum Activities Program.

²⁶ Woodside's IMS risk assessment process was developed with regard to the national biofouling management guidelines for the petroleum production and exploration industry and guidelines for the control and management of a ships' biofouling to minimise the transfer of invasive aquatic species (IMO Guidelines, 2011).

²⁷ Low risk of introducing IMS of concern is defined as either no additional management measures required or, management measures have been applied to reduce the risk.

Environmental Performance Outcomes, Standards and Measurement Criteria			
Outcomes	Controls	Standards	Measurement Criteria
	<ul style="list-style-type: none"> • vessel type • recent IMS inspection and cleaning history, including for internal niches • out-of-water period before mobilisation • age and suitability of antifouling coating at mobilisation date • internal treatment systems and history • origin and proposed area of operation • number of stationary/slow speed periods >7 days • region of stationary or slow periods • type of activity – contact with seafloor. <p>For immersible equipment:</p> <ul style="list-style-type: none"> • region of deployment since last thorough clean, particularly coastal locations • duration of deployments • duration of time out of water since last deployment • transport conditions during mobilisation • post-retrieval maintenance regime. <p>Based on the outcomes of each IMS risk assessment, management measures commensurate with the risk (such as treating internal systems, IMS inspections or cleaning) will be implemented to minimise the likelihood of IMS being introduced.</p>	<p>PS 16.2.2</p> <p>In accordance with Woodside's IMS risk assessment process, the IMS risk assessments will be undertaken by an authorised environment adviser who has completed relevant Woodside IMS training or by qualified and experienced IMS inspector.</p>	<p>MC 16.2.2</p> <p>Records confirm that the IMS risk assessments undertaken by an Environment Adviser or IMS inspector (as relevant).</p>

6.8 EPBC Act Assessment

6.8.1 Principles of ESD

For all impacts and risks assessed in **Section 6** an assessment was conducted to determine if the Petroleum Activities Program was consistent with relevant principles of ESD, as described in **Section 2.7.2**.

This assessment determined that the activity is consistent with principles of ESD a), b), c) and d). Principle e) ('improved valuation, pricing and incentive mechanisms should be promoted') is not relevant to the activity.

6.8.2 MNES Significant Impact Guidelines

As part of the evaluation of potential impacts and risks from routine acoustic emissions from seismic survey equipment (**Section 6.7**) an assessment was undertaken to determine if any relevant significant impact criteria for EPBC Act listed Endangered or Vulnerable species were met.

The activity will not result in any population level effects on any populations of listed Endangered or Vulnerable species, nor will it "modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline". Therefore, the Petroleum Activities Program will not have a significant impact on any MNES.

6.8.3 Recovery Plan and Threat Abatement Plan Assessment

As described in **Section 2.9.3**, NOPSEMA will not accept an EP that is inconsistent with a recovery plan or threat abatement plan for a listed threatened species or ecological community. This section describes the assessment that Woodside has undertaken to demonstrate that the Petroleum Activities Program is not inconsistent with any relevant recovery plans or threat abatement plans. For the purposes of this assessment, the relevant Part 13 statutory instruments (recovery plans and threat abatement plans) are:

- Recovery Plan for Marine Turtles in Australia 2017–2027 (DoEE, 2017a).
- Conservation Management Plan for the Blue Whale 2015–2025 (DoE, 2015a).
- Recovery Plan for the Grey Nurse Shark (*Carcharias taurus*) 2014 (DoE, 2014).
- Sawfish and River Shark Multispecies Recovery Plan (DoE, 2015b)
- Threat Abatement Plan for the impacts of marine debris on the vertebrate wildlife of Australia's coasts and oceans 2018 (DoEE, 2018).

Table 6-19 lists the objectives and (where relevant) the action areas of these plans, and also describes whether these objectives/action areas are applicable to government, the Titleholder, and/or the Petroleum Activities Program. For those objectives/action areas applicable to the Petroleum Activities Program, the relevant actions of each plan have been identified, and an evaluation has been conducted as to whether impacts and risks resulting from the activity are clearly inconsistent with that action or not. The results of this assessment against relevant actions are presented in **Table 6-20** to **Table 6-24**.

Table 6-19: Identification of applicability of recovery plan and threat abatement plan objectives and action areas

EPBC Act Part 13 Statutory Instrument	Applicable to:		
	Government	Titleholder	Petroleum Activities Program
Marine Turtle Recovery Plan			
Long-term Recovery Objective: Minimise anthropogenic threats to allow for the conservation status of marine turtles to improve so they can be removed from the EPBC Act threatened species list	Y	Y	Y
Interim Recovery Objectives			
Current levels of legal and management protection for marine turtle species are maintained or improved, both domestically and throughout the migratory range of Australia's marine turtles	Y		
The management of marine turtles is supported	Y		
Anthropogenic threats are demonstrably minimised	Y	Y	Y
Trends in nesting numbers at index beaches and population demographics at important foraging grounds are described	Y	Y	
Action Areas			
A. Assessing and addressing threats			
A1. Maintain and improve efficacy of legal and management protection	Y		
A2. Adaptively manage turtle stocks to reduce risk and build resilience to climate change and variability	Y		
A3. Reduce the impacts of marine debris	Y	Y	Y
A4. Minimise chemical and terrestrial discharge	Y	Y	Y
A5. Address international take within and outside Australia's jurisdiction	Y		
A6. Reduce impacts from terrestrial predation	Y		
A7. Reduce international and domestic fisheries bycatch	Y		
A8. Minimise light pollution	Y	Y	Y
A9. Address the impacts of coastal development/infrastructure and dredging and trawling	Y	Y	
A10. Maintain and improve sustainable Indigenous management of marine turtles	Y		

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EPBC Act Part 13 Statutory Instrument		Applicable to:		
		Government	Titleholder	Petroleum Activities Program
B. Enabling and measuring recovery				
B1. Determine trends in index beaches		Y	Y	Y
B2. Understand population demographics at key foraging grounds		Y		
B3. Address information gaps to better facilitate the recovery of marine turtle stocks		Y	Y	Y
Blue Whale Conservation Management Plan				
Long-term recovery objective: Minimise anthropogenic threats to allow for their conservation status to improve so that they can be removed from the EPBC Act threatened species list		Y	Y	Y
Interim Recovery Objectives				
The conservation status of blue whale populations is assessed using efficient and robust methodology		Y		
The spatial and temporal distribution, identification of biologically important areas, and population structure of blue whales in Australian waters is described		Y	Y	Y
Current levels of legal and management protection for blue whales are maintained or improved and an appropriate adaptive management regime is in place		Y		
Anthropogenic threats are demonstrably minimised		Y	Y	Y
Action Areas				
A. Assessing and addressing threats				
A.1: Maintain and improve existing legal and management protection		Y		
A.2: Assessing and addressing anthropogenic noise		Y	Y	Y
A.3: Understanding impacts of climate variability and change		Y		
A.4: Minimising vessel collisions		Y	Y	Y
B. Enabling and Measuring Recovery				
B.1: Measuring and monitoring population recovery		Y		

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EPBC Act Part 13 Statutory Instrument		Applicable to:		
		Government	Titleholder	Petroleum Activities Program
B.2: Investigating population structure		Y		
B.3: Describing spatial and temporal distribution and defining biologically important habitat		Y	Y	Y
Grey Nurse Shark Recovery Plan				
Overarching Objective				
To assist the recovery of the grey nurse shark in the wild, throughout its range in Australian waters, with a view to:				
<ul style="list-style-type: none"> improving the population status, leading to future removal of the grey nurse shark from the threatened species list of the EPBC Act ensuring that anthropogenic activities do not hinder the recovery of the grey nurse shark in the near future, or impact on the conservation status of the species in the future 		Y	Y	Y
Specific Objectives				
Develop and apply quantitative monitoring of the population status (distribution and abundance) and potential recovery of the grey nurse shark in Australian waters		Y		
Quantify and reduce the impact of commercial fishing on the grey nurse shark through incidental (accidental and/or illegal) take, throughout its range		Y		
Quantify and reduce the impact of recreational fishing on the grey nurse shark through incidental (accidental and/or illegal) take, throughout its range		Y		
Where practicable, minimise the impact of shark control activities on the grey nurse shark		Y		
Investigate and manage the impact of ecotourism on the grey nurse shark		Y		
Manage the impact of aquarium collection on the grey nurse shark		Y		
Improve understanding of the threat of pollution and disease to the grey nurse shark		Y	Y	Y
Continue to identify and protect habitat critical to the survival of the grey nurse shark and reduce the impact of threatening processes within these areas		Y	Y	
Continue to develop and implement research programs to support the conservation of the grey nurse shark		Y	Y	
Promote community education and awareness in relation to grey nurse shark conservation and management		Y		

EPBC Act Part 13 Statutory Instrument		Applicable to:		
		Government	Titleholder	Petroleum Activities Program
Sawfish and River Sharks Recovery Plan				
Primary Objective				
To assist the recovery of sawfish and river sharks in Australian waters with a view to:				
<ul style="list-style-type: none"> improving the population status leading to the removal of the sawfish and river shark species from the threatened species list of the EPBC Act ensuring that anthropogenic activities do not hinder recovery in the near future, or impact on the conservation status of the species in the future 	Y	Y	Y	
Specific Objectives				
Reduce and, where possible, eliminate adverse impacts of commercial fishing on sawfish and river shark species	Y			
Reduce and, where possible, eliminate adverse impacts of recreational fishing on sawfish and river shark species	Y			
Reduce and, where possible, eliminate adverse impacts of Indigenous fishing on sawfish and river shark species	Y			
Reduce and, where possible, eliminate the impact of illegal, unregulated and unreported fishing on sawfish and river shark species	Y			
Reduce and, where possible, eliminate adverse impacts of habitat degradation and modification on sawfish and river shark species	Y	Y	Y	Y
Reduce and, where possible, eliminate any adverse impacts of marine debris on sawfish and river shark species noting the linkages with the Threat Abatement Plan for the Impact of Marine Debris on Vertebrate Marine Life	Y	Y	Y	Y
Reduce and, where possible, eliminate any adverse impacts of collection for public aquaria on sawfish and river shark species	Y			
Improve the information base to allow the development of a quantitative framework to assess the recovery of, and inform management options for, sawfish and river shark species	Y			
Develop research programs to assist conservation of sawfish and river shark species	Y	Y	Y	
Improve community understanding and awareness in relation to sawfish and river shark conservation and management	Y			

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EPBC Act Part 13 Statutory Instrument		Applicable to:		
		Government	Titleholder	Petroleum Activities Program
Marine Debris Threat Abatement Plan				
Objectives				
Contribute to long-term prevention of the incidence of marine debris		Y	Y	
Understand the scale of impacts from marine plastic and microplastic on key species, ecological communities and locations		Y	Y	Y
Remove existing marine debris		Y		
Monitor the quantities, origins, types and hazardous chemical contaminants of marine debris, and assess the effectiveness of management arrangements for reducing marine debris		Y		
Increase public understanding of the causes and impacts of harmful marine debris, including microplastic and hazardous chemical contaminants, to bring about behaviour change		Y		

Table 6-20: Assessment against relevant actions of the Marine Turtle Recovery Plan

Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
Marine Turtle Recovery Plan	Action Area A3: Reduce the impacts from marine debris	<p>Action: Support the implementation of the Marine Debris Threat Abatement Plan (TAP)</p> <p><u>Priority actions at stock level:</u></p> <ul style="list-style-type: none"> G-NWS – understand the threat posed to this stock by marine debris LH-WA – determine the extent to which marine debris is impacting loggerhead turtles F-Pil and H-WA – no relevant actions 	<p>Refer Section 6.7.5</p> <p>Not inconsistent assessment: The assessment of accidental release of solid hazardous and non-hazardous wastes has considered the potential risks to marine turtles.</p>	<p>EPO 13</p> <p>C 13.1</p> <p>PS 13.1</p>

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Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
	<p>Action Area A4: Minimise chemical and terrestrial discharge</p>	<p>Action: Ensure spill risk strategies and response programs adequately include management for marine turtles and their habitats, particularly in reference to 'slow to recover habitats', e.g. nesting habitat, seagrass meadows or coral reefs</p> <p><u>Priority actions at stock level:</u></p> <ul style="list-style-type: none"> G-NWS – ensure that spill risk strategies and response programs include management for turtles and their habitats LH-WA, F-Pil – ensure that spill risk strategies and response programs include management for turtles and their habitats, particularly in reference to slow to recover habitats, e.g. seagrass meadows or corals H-WA – no relevant actions 	<p>Refer Sections 6.7.2, 6.7.3 and 6.7.4</p> <p>Not inconsistent assessment: The assessment of accidental release of chemicals / hydrocarbons has considered the potential risks to marine turtles. Spill risk strategies and response program include management measures for turtles and their nesting habitats.</p>	<p>Refer Section 7.10.</p> <p>Detailed oil spill preparedness and response performance outcomes, standards and measurement criteria for the Petroleum Activities Program are present in Appendix D.</p>
	<p>Action Area A8: Minimise light pollution</p>	<p>Action: Artificial light within or adjacent to habitat critical to the survival of marine turtles will be managed such that marine turtles are not displaced from these habitats</p> <p><u>Priority actions at stock level:</u></p> <ul style="list-style-type: none"> G-NWS – as above LH-WA – no relevant actions F-Pil and H-WA – manage artificial light from onshore and offshore sources to ensure biologically important behaviours of nesting adults and emerging/dispersing hatchlings can continue 	<p>Refer Section 6.6.6.</p> <p>Not inconsistent assessment: The assessment of light emissions has considered the potential impacts to marine turtles. Internesting, mating, foraging or migrating turtles are not impacted by light from offshore vessels. Vessel light emissions could cause localised and temporary behavioural disturbance to isolated transient individuals, which is unlikely to result in displacement of adult turtles from internesting or nesting habitat critical to the survival of marine turtles.</p>	<p>N/A</p>
	<p>Action Area B1: Determine trends at index beaches</p>	<p>Action: Maintain or establish long-term monitoring programs at index beaches to collect</p>	<p>Not inconsistent assessment: Woodside contributes to Action Area B1 via its support of the Ningaloo Turtle Program²⁸.</p>	<p>N/A</p>

²⁸ http://www.ningalooturtles.org.au/media_reports.html

Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
		<p>standardised data critical for determining stock trends, including data on hatching production</p> <p><u>Priority actions at stock level:</u></p> <ul style="list-style-type: none"> • G-NWS – continue long-term monitoring of index beaches • LH-WA – continue long-term monitoring of nesting and foraging populations • F-Pil and H-WA – no relevant actions 		
	<p>Action Area B3: Address information gaps to better facilitate the recovery of marine turtle stocks</p>	<p>Action: Understand the impacts of anthropogenic noise on marine turtle behaviour and biology</p> <p><u>Priority actions at stock level:</u></p> <ul style="list-style-type: none"> • G-NWS – given this is a relatively accessible stock that is likely to be exposed to anthropogenic noise – Investigate the impacts of anthropogenic noise on turtle behaviour and biology and extrapolate findings from the North West Shelf stock to other stocks • LH-WA, F-Pil – no relevant actions • H-WA – investigate mixed stock genetics at foraging grounds 	<p>Refer Sections 6.6 and 6.6.2</p> <p>Not inconsistent assessment: The assessment of acoustic emissions has considered the potential impacts marine turtles. Vessel and seismic acoustic emissions could cause localised and short-term behavioural disturbance to isolated transient individuals, which is unlikely to result in displacement of adult turtles from interbreeding or nesting habitat critical to the survival of marine turtles.</p>	N/A
<p>Assessment Summary</p> <p>The Marine Turtle Recovery Plan has been considered during the assessment of impacts and risks, and the Petroleum Activities Program is not considered to be inconsistent with the relevant actions of this plan.</p>				

Table 6-21: Assessment against relevant actions of the Blue Whale Conservation Management Plan

Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
Blue Whale Conservation Management Plan	Action Area A.2: Assessing and addressing anthropogenic noise	Action 2: Assessing the effect of anthropogenic noise on blue whale behaviour Action 3: Anthropogenic noise in biologically important areas will be managed such that any blue whale continues to use the area without injury, and is not displaced from a foraging area	Refer Section 6.6.2 Not inconsistent assessment: The assessment of acoustic emissions has considered the potential impacts to pygmy blue whales. PTS or TTS effects to pygmy blue whales are not predicted to occur from exposure to a single impulse. However, as the activity is taking place within the distribution range for pygmy blue whales there is a possibility of encountering individual whales. If this occurs, the application of EPBC Policy Statement 2.1 Part A Standard Management Procedures and extended observation and shut-down zones (Part B.4) will minimise the likelihood of PTS or TTS effects. Further to this seismic source discharge is not planned to occur within 25 km of the pygmy blue whale migration BIA (C 4.5) to conservatively account for the ANIMAT modelling predicted maximum range at which pygmy blue whales may experience TTS of 21.73 km. Additional adaptive management measures (Part B.6) are considered conservative and appropriate to provide protection to pygmy blue whales that may be exposed to multiple pulses at extended ranges from the source (i.e. extended visual observation zone). The use of a spotter vessel with qualified MFOs ~5 km ahead of the seismic vessel and towed array during all daytime seismic activity will effectively extend the implementation of the pygmy blue whale / large unidentified whale shut down zone via sightings triggered activation of EPBC Act Policy Statement 2.1. C 4.4 provides for an	EPO 4 C 4.1, PS 4.1 C 4.4, PS 4.4 C 4.5, PS 4.5 C 4.6, PS 4.6

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Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
		<p>The BWCMP Guidance on Key Terms states 'In areas other than those identified in the CMP or NCVA (described in points (i) and (ii) above), where it can be reasonably predicted that blue whale foraging is probable, known or whale presence is detected, adaptive management should be used during industry activities to prevent unacceptable impacts i.e., no injury or biologically significant behavioural disturbance to blue whales from underwater anthropogenic noise.'</p>	<p>adaptive management process guiding night time seismic activities linked to the number of pygmy blue whale day time mitigation events. The impact assessment has determined that seismic acquisition may be undertaken in a manner that is not inconsistent with the requirements of the Conservation Management Plan for the Blue Whale. Acoustic modelling and ANIMAT modelling have demonstrated TTS effects will not occur in the pygmy blue whale migration BIA and sound levels will not result in displacement from foraging areas.</p> <p>A revisit of the available telemetry data (Thums et al., 2022) has confirmed the track for the one individual pygmy blue whale that travelled to the west of the migration BIA in the peak northbound migratory season did partially overlap the eastern edge of the Operational Area and the south-east corner of the Active Source Area. The residual risk of no potential TTS effects does not change with the confirmation of a migrating pygmy blue whale that may have been opportunistically foraging in and in proximity to the Operational Area and Active Source Area. As a precautionary approach, an additional control (under the application of the EPBC Statement Policy 2.1, Part B.3) will be implemented during all day time seismic activity comprising a spotter vessel (with two MFOs onboard) ~5 km ahead of the seismic vessel to observe for pygmy blue whales. MFOs aboard the spotter vessel will implement mitigations as per C 4.1. This is in addition to the suite of control measures including a shut-down zone to limits of visibility</p>	<p>EPO 4 C 4.1, PS 4.1 C 4.4, PS 4.4 C 4.5, PS 4.5 C 4.6, PS 4.6</p>

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Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
			<p>for positively identified (certain or probable confidence level) pygmy blue whales or large unidentified whales, and 2 km for all whales, which reduces the potential for close range sound exposures where the greatest sound contribution is received.</p> <p>This will ensure the activity is not inconsistent with the BWCMP (Action 2&3): <i>Anthropogenic noise in biologically important areas will be managed such that any blue whale continues to utilise the area without injury, and is not displaced from a foraging area</i></p>	
	<p>Action Area A.4: Minimising vessel collisions</p> <p>Action Area B.3: Describing spatial and temporal distribution and defining biologically important habitat</p>	<p>Action 3: Ensure the risk of vessel strikes on blue whales is considered when assessing actions that increase vessel traffic in areas where blue whales occur and, if required, appropriate mitigation measures are implemented</p> <p>Action 2: Identify migratory pathways between breeding and feeding grounds</p> <p>Action 3: Assess timing and residency within Biologically Important Areas</p>	<p>Refer Section 6.7.6.</p> <p>Not inconsistent assessment: The assessment of vessel collision with marine fauna has considered the potential risks to pygmy blue whales. If the Petroleum Activities Program overlaps with the northbound or southbound migration, individuals may deviate slightly from the migratory route, but will continue on their migration unhindered. Vessel collisions with pygmy blue whales are highly unlikely to occur, given the very slow vessel speeds and presence of MFOs.</p> <p>Not inconsistent assessment: Woodside contributes to Action Area B3 via its support of targeted research initiatives (e.g. satellite tracking of pygmy blue whale migratory movements²⁹).</p>	<p>EPO 14 C 14.1 PS 14.1.1</p> <p>N/A</p>

²⁹ Double, M.C., Andrews-Goff, V., Jenner, K.C.S., Jenner, M.-N., Laverick, S.M., Branch, T.A., Gales, N.J., 2014. Migratory movements of pygmy blue whales (*Balaenoptera musculus brevicauda*) between Australia and Indonesia as revealed by satellite telemetry. PLoS One 9, e83578

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Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
<p>Assessment Summary The Blue Whale Conservation Management Plan has been considered during the assessment of impacts and risks, and the Petroleum Activities Program is not considered to be inconsistent with the relevant actions of this plan.</p>				

Table 6-22: Assessment against relevant actions of the Sawfish and River Shark Recovery Plan

Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
<p>Sawfish and River Shark Recovery Plan</p>	<p>Objective 5: Reduce and, where possible, eliminate adverse impacts of habitat degradation and modification on sawfish and river shark species</p>	<p>Action 5c: Identify risks to important sawfish and river shark habitat and measures needed to reduce those risks</p>	<p>Refer Sections 6.7.2, 6.7.3 and 6.7.4 Not inconsistent assessment: The assessment of accidental release of chemicals / hydrocarbons has considered the potential risks to sawfish and river shark.</p>	<p>Refer Section 7.10. Detailed oil spill preparedness and response performance outcomes, standards and measurement criteria for the Petroleum Activities Program are present in Appendix D.</p>
<p>Assessment Summary</p>	<p>Objective 6: Reduce and, where possible, eliminate any adverse impacts of marine debris on sawfish and river shark species</p>	<p>Action 6a: Assess the impacts of marine debris including ghost nets, fishing gear and plastics on sawfish and river shark species</p>	<p>Refer Section 6.7.5. Not inconsistent assessment: The assessment of accidental release of solid hazardous and non-hazardous wastes has considered the potential risks to sawfish and river sharks.</p>	<p>EPO 13 C 13.1 PS 13.1</p>

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Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
	The Sawfish and River Shark Recovery Plan has been considered during the assessment of impacts and risks, and the Petroleum Activities Program is not considered to be inconsistent with the relevant actions of this plan.			

Table 6-23: Assessment against relevant actions of the Grey Nurse Shark Recovery Plan

Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
Grey Nurse Shark Recovery Plan	Objective 7: Improve understanding of the threat of pollution and disease to the grey nurse shark	Action 7.1: Review and assess the potential threat of introduced species, pathogens and pollutants	Refer Sections 6.7.5 and 6.6.5. Not inconsistent assessment: This EP includes an assessment of the impacts from accidental release of solid wastes as well as planned discharges of drilling waste on marine species.	N/A
			Refer Sections 6.7.2, 6.7.3 and 6.7.4. Not inconsistent assessment: The assessment of accidental release of chemicals / hydrocarbons has considered the potential risks to grey nurse sharks.	Refer Section 7.10. Detailed oil spill preparedness and response performance outcomes, standards and measurement criteria for the Petroleum Activities Program are present in Appendix D.
Assessment Summary				
The Grey Nurse Shark Recovery Plan has been considered during the assessment of impacts and risks, and the Petroleum Activities Program is not considered to be inconsistent with the relevant actions of this plan.				

Table 6-24: Assessment against relevant actions of the Marine Debris Threat Abatement Plan

Part 13 Statutory Instrument	Relevant Action Areas/Objectives	Relevant Actions	Evaluation	EPO, Controls and PS
<i>Marine Debris TAP</i>	Objective 1: Contribute to long-term prevention of marine debris.	Action 1.02: Limit the amount of single use plastic material lost to the environment in Australia.	Refer Section 6.7.5 . Not inconsistent assessment: The assessment of accidental release of solid hazardous and non-hazardous wastes has considered the potential risks to vertebrate wildlife.	EPO 13 C 13.1 PS 13.1
Assessment Summary The Marine Debris TAP has been considered during the assessment of impacts and risks, and the Petroleum Activities Program is not considered to be inconsistent with the relevant actions of this plan.				

7 IMPLEMENTATION STRATEGY

7.1 Overview

Regulation 14 of the Environment Regulations requires an EP to contain an implementation strategy for the activity. The implementation strategy for the Petroleum Activities Program confirms fit-for-purpose systems, practices and procedures are in place to direct, review and manage the activities so that environmental risks and impacts are continually being reduced to ALARP and are acceptable, and that EPOs and EPSs outlined in this EP are achieved.

Woodside, as Operator, is responsible for ensuring that the Petroleum Activities Program is managed in accordance with this implementation strategy and the WMS (see **Section 1.7.4**).

7.2 Systems, Practice and Procedures

All operational activities are planned and carried out in accordance with relevant legislation and internal environment standards and procedures identified in this EP (**Section 2.4**).

Processes are implemented to verify controls to manage environmental impacts and risks to:

- a level that is ALARP and acceptable
- meet EPOs
- comply with EPSs defined in this EP.

The systems, practices and procedures that will be implemented are listed in the EPSs contained in this EP. Document names and reference numbers may be subject to change during the statutory duration of this EP; this is managed through a change register and management of change process.

7.3 Roles and Responsibilities

Key roles and responsibilities for Woodside and contractor personnel relating to implementing, managing and reviewing this EP are described in **Table 7-1**. Roles and responsibilities for oil spill preparation and response are outlined in **Appendix D** and the [Woodside Oil Pollution Emergency Arrangements \(Australia\)](#).

Table 7-1: Roles and Responsibilities

Title (role)	Environmental Responsibilities
<p>Office-based Personnel</p> <p>Woodside Survey Operations Project Manager</p>	<ul style="list-style-type: none"> • Verify relevant Environmental Approvals for the activities exist before commencing activity. • Monitor and manage the activity so it is performed as per the relevant standards and commitments in this EP. • Notify the Woodside Environment Adviser in a timely manner of any scope changes. • Liaise with regulatory authorities as required. • Review this EP as necessary and manage change requests. • Ensure all project and support vessel crew members complete a Project (Including HSE) induction. • Verify that contractors meet environmental related contractual obligations. • Liaise with contractors to ensure communication and understanding of environment requirements as outlined in this EP. • Confirm environmental incident reporting meets regulatory requirements (as outlined in this EP) and Woodside's HSE Reporting and Investigation Procedure. • Monitor and close out corrective actions identified during environmental monitoring or audits. • Track compliance with performance outcomes and performance standards as per the requirements of this EP.
<p>Woodside Environmental Adviser</p>	<ul style="list-style-type: none"> • Prepare environmental component of relevant Induction Package. • Review compliance with performance outcomes and performance standards as per the requirements of this EP. • Ensure relevant Environmental Approvals for the activities exist before commencing activity. • Input to environmental component of relevant Induction Package. • Assist with the review, investigation and reporting of environmental incidents as required. • Assist environmental monitoring and inspections/audits are performed as per the requirements of this EP as required. • Liaise with relevant regulatory authorities as required. • Assist in preparing required external regulatory reports, in line with environmental approval requirements and Woodside incident reporting procedures. • Provide advice to relevant Woodside personnel and contractors to help them understand their environment responsibilities. • Support the Survey Operations Project Manager in ensuring communications and understanding of environment requirements as outlined in this EP. • Provide environmental support for activities through regular engagement with WSR.

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Title (role)	Environmental Responsibilities
Woodside Corporate Affairs Adviser	<ul style="list-style-type: none"> • Prepare and implement the Stakeholder Consultation Plan for the Petroleum Activities Program. • Report on stakeholder consultation. • Continuously liaise and provide notification as required as outlined in the EP.
Woodside Marine Assurance Superintendent	<ul style="list-style-type: none"> • Source and conduct relevant audit and inspection to confirm vessels comply with relevant Marine Orders and Woodside Marine Charters Instructions requirements.
Woodside Corporate Incident Coordination Centre (CICC) Duty Manager	<p>On receiving notification of an incident, the Woodside CICC Duty Manager shall:</p> <ul style="list-style-type: none"> • Establish and take control of the Incident Management Team and establish an appropriate command structure for the incident. • Assess the situation, identify risks and actions to minimise the risk. • Communicate impact, risk and progress to the Crisis Management Team and stakeholders. • Develop the Incident Action Plan (IAP) including objectives for action. • Approve, implement and manage the IAP. • Communicate within and beyond the incident management structure. • Manage and review safety of responders. • Address the broader public safety considerations. • Conclude and review activities.
Vessel-based Personnel	
Vessels Master	<ul style="list-style-type: none"> • Ensure the vessel management system and procedures are implemented. • Ensure personnel commencing work on the vessel receive an environmental induction that meets the relevant requirements specified in this EP. • Ensure personnel are competent to perform the work they have been assigned. • Verify SOPEP drills are conducted as per the vessel's schedule. • Ensure the vessel Emergency Response Team has been given sufficient training to implement the SOPEP. • Ensure any environmental incidents or breaches of relevant EPOs or PSs detailed in this EP, are reported immediately to the Party Chief and Woodside Site Representative. • Ensure corrective actions for incidents or breaches are developed, communicated to the Woodside Site Representative, and tracked to closeout in a timely manner. Ensure closeout of actions is communicated to the Woodside Site Representative.

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Title (role)	Environmental Responsibilities
Party Chief / Manager	<ul style="list-style-type: none"> • Understand and manage environmental aspects of the seismic operations per this EP and approval conditions. • Provide copies of documents, records, reports and certifications (as requested by Woodside) in a timely manner to assist in compliance reporting. • Ensure any environmental incidents or breaches of EPOs or PSs detailed in this EP, are reported immediately to the Woodside Site Representative and Woodside Survey Operations Project Manager.
Woodside Site Representative	<ul style="list-style-type: none"> • Ensure project personnel adhere to the requirements of this EP so the EPOs are met, and the PSs detailed in this EP are implemented during seismic operations. • Ensure environmental incidents or breaches of outcomes or standards are reported as per the Woodside event notification requirements. Corrective actions for incidents and breaches must be developed, tracked and closed out in a timely manner. • Ensure periodic environmental inspections are completed. Monitor and close out corrective actions (eCAR) identified during environmental monitoring or audits/inspections. • Ensure any environmental incidents or breaches of EPOs or PSs detailed in this EP, are reported immediately to the Woodside Survey Operations Project Manager. • Review Contractors' procedures, input into Toolbox talks and JSAs. • Provide environmental support for activities through regular engagement with Woodside Environmental Adviser.
Marine Fauna Observer	<ul style="list-style-type: none"> • Provide training through induction/briefing to all vessel crew likely to assist with marine fauna observations. • Record observations of marine fauna and monitor and report on compliance with acoustic operating requirements.

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It is the responsibility of all Woodside employees and contractors to implement the Woodside Corporate Environment and Biodiversity Policy (refer to **Appendix A**) in their areas of responsibility and that the personnel are suitably trained and competent in their respective roles.

7.4 Training and Competency

Woodside as part of its contracting process assesses a proposed Contractor's environmental management system to determine the level of consistency with the standard AS/NZ ISO 14001. This assessment is conducted for the Petroleum Activities Program as part of the tendering / vendor selection process. The assessment determines whether there is an organisational structure that clearly defines the roles and responsibilities for key positions. The assessment also determines whether there is an up-to-date training matrix that defines any corporate and site/activity-specific environmental training and competency requirements.

All crew will be aware of their roles and responsibilities regarding environmental risks throughout the Petroleum Activities Program. As a minimum, environmental awareness training is required for all personnel, detailing awareness and compliance with the Contractor's environmental policy and environmental management system.

7.4.1 Inductions

Inductions are provided to all relevant personnel (e.g. Contractors and Company representatives) before mobilising to or on arrival at the activity location. The induction covers the HSE requirements and environmental information specific to the activity location. Attendance records are maintained.

The Petroleum Activities Program induction may cover information about:

- description of the activity
- ecological and socio-economic values of the activity location
- regulations relevant to the activity
- Woodside's Environmental Management System – Environment and Biodiversity Policy
- EP importance/structure/implementation/roles and responsibilities
- main environmental aspects/hazards and potential environmental impacts and related performance outcomes
- oil spill preparedness and response
- monitoring and reporting on performance outcomes and standards using measurement criteria
- incident reporting.
- In addition, as recreational fishing is prohibited from seismic vessels, this requirement will be covered in the induction.

7.4.2 Petroleum Activity Specific Environmental Awareness

Before the Petroleum Activities Program begins, a Woodside Project Manager will hold a pre-activity meeting with all relevant personnel. The pre-activity meeting provides an opportunity to reiterate specific environmental sensitivities or commitments associated with the activity. Attendance lists are recorded and retained.

During operations, regular HSE meetings will be held on the seismic vessel and support vessel(s). During these meetings, environmental incidents are reviewed and awareness material presented. Attendance lists are recorded and retained.

Additional materials are to be provided to project personnel as required to facilitate/support compliance with performance standards and collection of data related to measurement criteria.

7.4.3 Management of Training Requirements

All personnel on the vessels are required to be competent to perform their assigned positions. This may be in the form of external or 'on the job' training. The vessel Safety Training Coordinator (or equivalent) is responsible for identifying training needs, keeping records of training undertaken, and identifying minimum training requirements.

7.5 Monitoring, Auditing, Management of Non-conformance and Review

7.5.1 Monitoring

Woodside and its Contractors will conduct a program of periodic monitoring during the Petroleum Activities Program – starting at mobilisation and continuing through the duration of the activity to activity completion. This information will be collected using the tools and systems outlined below, developed based on the environmental performance outcomes, controls, standards and measurement criteria in this EP. The tools and systems will collect, as a minimum, the data (evidence) referred to in the measurement criteria in **Sections 6.6** and **6.7** and **Appendix D**.

The collection of this data (against the measurement criteria) will form part of the permanent record of compliance maintained by Woodside. It will form the basis for demonstrating that the environmental performance outcomes and standards are met, which will be summarised in a series of routine reporting documents.

7.5.1.1 Source-Based Impacts and Risks

The tools and systems to monitor environmental performance, where relevant, will include:

- daily reports, which include leading indicator compliance
- periodic review of waste management and recycling records
- use of Contractor's risk identification program that requires personnel to record and submit safety and environment risk observation cards on a routine basis (frequency varies with contractor)
- collection of evidence of compliance with the controls detailed in the EP relevant to offshore activities by the Woodside Site Representative (other compliance evidence is collected onshore)
- environmental discharge reports that record volumes of planned and unplanned discharges to ocean and atmosphere
- monitoring of progress against key performance indicators
- internal auditing and assurance program as described in Section 7.5.2
- Throughout this activity, Woodside will continuously identify new source-based risks and impacts through the Monitoring and Auditing systems and tools described above and in **Section 7.5.1.1**.

7.5.1.2 Management of Knowledge

Review of knowledge relevant to the existing environment is undertaken in order to identify changes relating to the understanding of the environment or legislation that supports the risk and impact assessments for EPs (in-force and in-preparation). Relevant knowledge is defined as:

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- Environmental science supporting the description of the existing environment
- Socio-economic environment and stakeholder information
- Environmental legislation.

The frequency and documentation of reviews, communication of relevant new knowledge and consideration of management of change are documented in the WMS Environment Plan Guideline.

In addition, in line with Condition 7.2 of Ministerial Statement No. 1172, the Scarborough Project will implement the Cultural Heritage Management Plan (CHMP), which has been developed in consultation with MAC. The CHMP will detail the process for a Heritage Management Committee to assess new information. Any relevant new information on cultural values will be assessed using the EP Management of Change Process (refer to **Section 7.6**).

Under the Oil Spill Scientific Monitoring Program preparedness, an annual review and update to the environmental baseline studies database is completed and documented. Periodic location-focused environmental studies and baseline data gap analyses are completed and documented. Any subsequent studies scoped and executed as a result of such gap analysis are managed by the Environment Science Team and tracked via the Corporate Environment Baseline Database.

7.5.1.3 Management of Newly Identified Impacts and Risks

New sources of receptor based impacts and risks identified through monitoring and auditing systems and tools and the Woodside Environment Knowledge Management System will be assessed using the Change Management Process (refer to **Section 7.6**).

7.5.2 Auditing

Environmental performance auditing will be performed to:

- Identify potential new, or changes to existing environmental impacts and risk, and methods for reducing those to ALARP.
- Confirm that mitigation measures detailed in this EP are effectively reducing environmental impacts and risk, that mitigation measures proposed are practicable and provide appropriate information to verify compliance.
- Confirm compliance with the environmental performance outcomes and performance standards detailed in this EP.

The internal audits/inspections and reviews, combined with the ongoing monitoring described in **Section 7.5.1**, and collection of evidence for measurement criteria are used to assess environmental performance outcomes and standards.

As part of Woodside's EMS and/or assurances processes, activities are periodically selected for environmental audits as per Woodside's internal auditing process. Audit, inspection and review findings relevant to continuous improvement of environmental performance are tracked through the Environmental Commitments and Actions Register (ECAR). This ECAR is used to track compliance with EP commitments, including any findings and corrective actions.

Non-conformances identified will be reported and/or tracked in accordance with **Section 7.5.3**.

7.5.2.1 Marine Assurance

Marine assurance is undertaken in accordance with the Marine Offshore Vessel Assurance Procedure (Woodside Doc No: [W0000PV1400355151](#)). The marine assurance process is managed by the Marine Assurance Team of the Marine Services.

The processes and procedures used are based on industry standards and consideration of guidelines and recommendations from recognised industry organisations such as Oil Companies International Marine Forum and International Maritime Contractors Association.

The Marine Offshore Vessel Assurance Procedure defines the marine offshore assurance activities applicable for all vessels chartered directly by or on behalf of Woodside. The procedure is mandatory for all vessels hired for Woodside operations, including for short-term hires (less than three months in duration).

The Marine Offshore Vessel Assurance Procedure ensures all vessel operators and vessels chartered only operate seaworthy vessels that meet the requirements for a defined scope of work, and are managed with a robust safety management system. The marine offshore vessel assurance process is multi-faceted and encompasses:

- offshore vessel safety management system assessment (OVMSA)
- offshore vessel inspection database (OVID) inspection or similar
- project support for tender review and evaluation, pre/post contract award.

OVID inspections are objective in nature and reflect what was observed while conducting the inspection. The inspection provides observations as opposed to non-conformances. Woodside will maintain records of the marine assurance review.

Where an OVID inspection and/or OVMSA verification review is not available, and all reasonable efforts based on time and resource availability to complete an OVID inspection and/or OVMSA verification review are undertaken (i.e. short-term vessel hire), the Marine Assurance Specialist Offshore may approve using an alternate means of inspection as defined in the Marine Offshore Vessel Assurance Procedure, known as a risk assessment.

7.5.2.2 Risk Assessment

Woodside conducts a risk assessment of vessels where either an OVMSA Verification Review and/or an OVID inspection cannot be completed (i.e. short term vessel hire). This is not a regular occurrence and is typically used when the requirements of the assurance process are unable to be met or the processes detailed are not applicable to a proposed vessel(s). The Marine Vessel Risk Assessment will be conducted by the Marine Assurance Superintendent, or the nominated deputy, where the vessel meets the short term hire prerequisites.

The risk assessment is a semi-quantitative method of determining what further assurance process activity, if any, is required to assure a vessel for a particular task or role. The process compares the level of management control a vessel is subject to against the risk factors associated with the activity or role.

Several factors are assessed as part of a vessel risk assessment, including:

- Management control factors:
 - company audit score (i.e. management system)
 - vessel HSE incidents
 - vessel Port State Control deficiencies
 - instances of Port State Control vessel detainment
 - years since previous satisfactory vessel inspection
 - age of vessel
 - contractors' prior experience operating for Woodside.

- Activity risk factors:
 - people health and safety risks (a function of the nature of the work and the area of operation)
 - environmental risks (a function of environmental sensitivity, activity type and magnitude of potential environment damage (e.g. largest credible oil spill scenario))
 - value risk (likely time and cost consequence to Woodside if the vessel becomes unusable)
 - reputation risk
 - exposure (i.e. exposure to risk based on duration of project)
 - industrial relations risk.

The acceptability of the vessel or requirement for further vessel inspections or audits is based on the ratio of vessel score to activity risk. If the vessel management control is not deemed to appropriately manage activity risk, a satisfactory company audit and/or vessel inspection may be required before awarding work.

The risk assessment is valid for the period a vessel is on hire and for the defined scope of work.

7.5.3 Management of Non-conformance

Woodside classifies non-conformances with environmental performance outcomes and standards in this EP as environmental incidents. Woodside employees and contractors are required to report all environmental incidents, and these are managed as per Woodside's Health, Safety and Environment Event Reporting and Investigation Procedure (Woodside Doc No. [WM0000PG9905421](#)).

An internal computerised database called First Priority is used to record and report these incidents. Details of the event, immediate action taken to control the situation, investigation outcomes and corrective actions to prevent reoccurrence are all recorded. Corrective actions are monitored using First Priority and closed out in a timely manner.

Woodside uses a consequence matrix for classification of environmental incidents, with the significant categories being A, B and C (as detailed in **Section 2.6.1**). Detailed investigations are completed for all categories A, B, C and high potential environmental incidents.

7.5.4 Review

7.5.4.1 Management Review

Within the Environment function, senior management regularly monitors and reviews environmental performance and the effectiveness of managing environmental risks and performance. Within each Function and Business Unit Leadership Team, managers regularly review environmental performance, including through HSE Review meetings.

Risks are also reviewed before the activity commences, including operational, safety and environmental risks of the Petroleum Activities Program, to support continuous improvement as outlined in the Woodside Risk Management Framework (refer to **Section 2.6.1**).

7.5.4.2 Learning and Knowledge Sharing

Learning and knowledge sharing occurs via a number of different methods including:

- HSE meetings
- event investigations

- event bulletins
- post-activity review, including the review of environmental incidents as relevant
- ongoing communication with seismic vessel operators
- formal and informal industry benchmarking
- cross-asset learnings.

7.6 EP Management of Change and Revision

Management of changes are managed in accordance with Woodside's Environmental Approval Requirements Australia Commonwealth Guideline. Management of changes relevant to this EP, concerning the scope of the activity description (**Section 3**) including: review of advances in technology at stages where new equipment may be selected such as vessel contracting; changes in understanding of the environment, DCCEEW EPBC Act listed threatened and migratory species status, Part 13 statutory instruments (recovery plans, threat abatement plans, conservation advice, wildlife conservation plans) and current requirements for AMPs; and potential new advice from external stakeholders (**Section 5**), will be managed in accordance with Regulation 17 of the Environment Regulations.

Risk will be assessed in accordance with the environmental risk management methodology (**Section 2.4**) to determine the significance of any potential new environmental impacts or risks not provided for in this EP. Risk assessment outcomes are reviewed in compliance with Regulation 17 of the Environment Regulations.

Minor changes where a review of the activity and the environmental risks and impacts of the activity do not trigger a requirement for a formal revision under Regulation 17 of the Environment Regulations, will be considered a 'minor revision'. Minor administrative changes to this EP, where an assessment of the environmental risks and impacts is not required (e.g. document references, phone numbers, etc.), will also be considered a 'minor revision'. Minor revisions as defined above will be made to this EP using Woodside's document control process. Minor revisions will be tracked in an MOC Register to ensure visibility of cumulative risk changes, as well as enable internal EP updates/reissuing as required. This document will be made available to NOPSEMA during regulator environment inspections.

7.7 OPEP Management of Change and Revision

Relevant documents from the OPEP (**Section 7.10** and **Table 7-5**) will be reviewed in the following circumstances:

- implementation of improved preparedness measures
- a change in the availability of equipment stockpiles
- a change in the availability of personnel that reduces or improves preparedness and the capacity to respond
- the introduction of a new or improved technology that may be considered in a response for this activity
- to incorporate, where relevant, lessons learned from exercises or events
- if national or state response frameworks and Woodside's integration with these frameworks changes.

Where changes are required to the OPEP, based on the outcomes of the reviews described above, they will be assessed against Regulation 17 to determine if resubmission of the EP, including the OPEP, is required (see **Section 7.6**).

Changes with potential to influence minor or technical changes to the OPEP are tracked in management of change records, project records and incorporated during internal updates of the OPEP or the five-yearly revision.

Woodside will maintain the following records:

- Woodside's HSPU Testing of Arrangements Register.
- Woodside Internal Equipment Maintenance Register.
- OPEP current and available.

Activity OPEPs will be revised at a minimum every five years in accordance with the Woodside Hydrocarbon Spill Preparedness and Response Procedure.

7.8 Record Keeping

Compliance records (outlined in Measurement Criteria in **Sections 6.6** and **6.7**) will be maintained. Record keeping will be in accordance with Regulation 15(7) that addresses maintaining records of emissions and discharge volumes. The records are maintained in the daily seismic reports.

7.9 Reporting

To meet the environmental performance outcomes and standards outlined in this EP, Woodside reports at a number of levels. These reporting arrangements are outlined below.

7.9.1 Routine Reporting (Internal)

7.9.1.1 Daily Progress Reports and Meetings

Daily reports for seismic activities are prepared and issued to key Company support personnel by relevant managers responsible for the activity. The report provides performance information about seismic activities, health, safety and environment, and current and planned work activities.

Meetings between key personnel are used to transfer information, discuss incidents, agree plans for future activities and develop plans and accountabilities for resolving issues.

7.9.1.2 Regular HSE Meetings

Regular HSE meetings are held with the offshore and Perth-based Project Manager and advisers (as required) to address HSE incidents and initiatives. Minutes of these meetings are produced and distributed as appropriate.

7.9.1.3 Performance Reporting

Daily, weekly and monthly performance reports are developed. These reports cover a number of subject matters, including:

- HSE incidents (including high potential incidents and those related to this EP) and recent activities
- corporate Key Performance Indicator targets, which include environmental metrics
- outstanding actions as a result of audits or incident investigations
- technical high and low lights.

7.9.2 Routine Reporting (External)

7.9.2.1 Ongoing Consultation

In accordance with Regulation 14 (9) of the Environment Regulations, the implementation strategy must provide for appropriate consultation with relevant authorities of the Commonwealth, a State or Territory and other relevant interested persons or organisations.

Woodside's approach to ongoing consultation is that feedback and comments received from relevant persons and additional persons continue to be assessed and responded to, as required, through the life of an EP, including during EP assessment and throughout the duration of the accepted EP, in accordance with the intended outcome of consultation (as set out in **Section 5.2**).

Woodside proposes to undertake the engagements with directly impacted relevant persons and additional persons listed in **Table 7-2**. Relevant new information identified during ongoing consultation will be assessed using the EP Management of Knowledge (refer to **Section 7.5.1.2** and Management of Change Process (refer to **Section 7.6**).

Woodside hosts community forums at which members are provided updates on Woodside activities on a regular basis (for example community reference group meetings). Representatives who present at those meetings are from community and industry and include Woodside, State Government (for instance relevant Regional Development Commissions), Local Government, Indigenous Groups, industry representative bodies, Community and industry organisations.

Relevant persons, additional persons and those who are merely interested in the activities, can otherwise remain up to date on this activity through subscribing to the Woodside website, or by reading the publicly available version of the EP on NOPSEMA's website, where available.

Should consultation feedback be received following EP acceptance that identifies a measure or control that requires implementation or update to meet the intended outcome of consultation (see **Section 5.2**), Woodside will apply its EP Management of Knowledge process (refer to **Section 7.5.1.2**) and Management of Change process (refer to **Section 7.6**), as appropriate.

Woodside has established and maintains a publicly available, up to date and interactive map to provide stakeholders with updated information on activities being conducted as part of the Petroleum Activities Program particularly during SIMOPS. The interactive map is available on Woodside's website (**Section 6.6.1, PS 1.6**).

The ongoing consultation engagements that Woodside intends to progress for this EP are set out in the table below.

Table 7-2: Ongoing consultation engagements

Report/ Information	Recipient	Purpose	Frequency	Content
Emails / Meetings	Relevant cultural authorities	Identification, assessment and consideration of cultural values relevant to the Operational Area and Consultation Area	Ongoing	Assessment of cultural values Any relevant new information on cultural values will be assessed using the EP Management of Knowledge (ref to Section 7.5) and Management of Change Process (refer to Section 7.6).

Report/ Information	Recipient	Purpose	Frequency	Content
Notification (email)	AHO	As requested by AMSA during consultation.	No less than 4 weeks prior to commencement.	PS 1.1 (Section 6.6.1) Date of activity start.
Updates (email)			As required.	Changes to planned activities
Notification (email)	AMSA	As requested by AMSA during consultation	At least 24–48 hours before operations commence	PS 1.2 (Section 6.6.1) Date of activity start.
Update (email)			Provide updates to the AHO and JRCC should there be changes to the activity.	Changes to planned activities
Notification (email)	DoD Air Services Australia	As requested by DoD during consultation If Notice to Airmen notification is required for activities in Restricted Airspace.	Five weeks prior to commencement of activities.	PS 1.5 (Section 6.6.1) Date of activity start.
Notification (email)	DMIRS	Good practice	At least 10 days prior to commencement.	Activity start date
Notification (email)	AFMA WAFIC CFA DPIRD Recfishwest DAFF – Fisheries Individual fishery licence holders that have the potential to be directly impacted by planned activities in the Operational Area (no relevant fisheries identified at time of EP submission) Eni	Good practice or as requested during consultation	At least 10 prior to commencement and following completion of activities.	PS 1.3 (Section 6.6.1) Date of activity start and end.
Notification (email)	All Relevant Persons for the Proposed Activity	Notification of significant change	As appropriate	Notification of significant change. Any relevant new information will be assessed using the EP Management of Knowledge (ref to Section 7.5.) and Management of Change Process (refer to Section 7.6.).

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Report/ Information	Recipient	Purpose	Frequency	Content
Emails / Meetings	Persons or organisations who provide feedback to Woodside post EP submission	Identification, assessment and consideration of feedback, claims and / or objections	As appropriate	Assessment of claims and / or objections. Relevant new information will be assessed using the EP Management of Knowledge (ref to Section 7.5) and Management of Change Process (refer to Section 7.6).

7.9.3 Start and End Notifications of the Petroleum Activities Program

In accordance with Regulation 29, Woodside will notify NOPSEMA of the commencement of the Petroleum Activities Program at least ten days before the activity commences and will notify NOPSEMA within ten days of completing the activity.

7.9.4 Environmental Performance Review and Reporting

In accordance with applicable environmental legislation for the activity, Woodside is required to report information on environmental performance to the appropriate regulator. Regulatory reporting requirements are summarised in **Table 7-3**.

Table 7-3: Routine external reporting requirements

Report	Recipient	Frequency	Content
Monthly Recordable Incident Report (Appendix E)	NOPSEMA	Monthly, by the 15 th of each month.	Details of recordable incidents that have occurred during the Petroleum Activities Program for the previous month (if applicable).
Environmental Performance Report	NOPSEMA	After completion all activity close-out actions and documentation. Within three months of completing the activity.	In accordance with the Environment Regulations, the report will address compliance with environmental performance outcomes and performance standards outlined in this EP.

7.9.5 End of the Environmental Plan

The EP will end when Woodside notifies NOPSEMA that the Petroleum Activities Program has ended and all the obligations identified in this EP have been completed, and NOPSEMA has accepted the notification, in accordance with Regulation 25A of the Environment Regulations.

7.9.6 Incident Reporting (Internal)

It is the responsibility of the Woodside Project Manager to ensure reporting of environmental incidents meets Woodside and regulatory reporting requirements as detailed in the Woodside Health, Safety and Environment Event Reporting and Investigation Procedure and this section of this EP.

7.9.7 Incident Reporting (External) – Reportable and Recordable

7.9.7.1 Reportable Incidents

Definition

A reportable incident is defined under Regulation 4 of the Environment Regulations as ‘*an incident relating to the activity that has caused, or has the potential to cause, moderate to significant environmental damage*’.

A reportable incident for the Petroleum Activities Program is:

- an incident that has caused environmental damage with a Consequence Level of Moderate (C) or above (as defined under Woodside’s Risk Table; refer to **Table 2-3**)
- an incident that has the potential to cause environmental damage with a Consequence Level of Moderate (C) or above (as defined under Woodside’s Risk Table – refer to **Table 2-3**).

The environmental risk assessment (**Section 6**) for the Petroleum Activities Program has not identified any risks with a potential consequence level of C+ for environment. All incidents with actual or potential environmental consequences will be investigated. Where an actual or potential environment consequence of C+ is identified this incident will still be classified as a reportable incident and appropriate notifications completed.

Any such incidents represent potential events which would be reportable incidents. Incident reporting is performed with consideration of NOPSEMA (2014) guidance stating, ‘if in doubt, notify NOPSEMA’, and assessed on a case-by-case basis to determine if they trigger a reportable incident as defined in this EP and by the Regulations.

Notification

NOPSEMA will be notified of all reportable incidents, according to the requirements of Regulations 26, 26A and 26AA of the Environment Regulations. Woodside will:

- Report all reportable incidents to the regulator (orally) ASAP, but within two hours of the incident or of its detection by Woodside.
- Provide a written record of the reported incident to NOPSEMA, the National Offshore Petroleum Titles Administrator (NOPTA) and the Department of the responsible Territory Minister (DITT) ASAP after orally reporting the incident.
- Complete a written report for all reportable incidents using a format consistent with the NOPSEMA Form FM0831 – Reportable Environmental Incident (**Appendix E**) which must be submitted to NOPSEMA ASAP, but within three days of the incident or of its detection by Woodside.
- Provide a copy of the written report to the NOPTA and DITT, within seven days of the written report being provided to NOPSEMA.
- AMSA will be notified of oil spill incidents ASAP after their occurrence, and DCCEEW notified if MNES are to be affected by the oil spill incident.

7.9.7.2 Recordable Incidents

Definition

A recordable incident is defined under Regulation 4 of the Environment Regulations as an incident arising from the activity that ‘*breaches an environmental performance outcome or environmental performance standard, in the EP for the petroleum activity, and is not a reportable incident*’.

Any breach of the environmental performance outcomes or standards (presented within **Sections 6.6** and **6.7**) will be raised as an incident and managed as per the notification and reporting requirements outlined below and the Woodside Health, Safety and Environment Event Reporting and Investigation Procedure.

Notification

NOPSEMA will be notified of all recordable incidents, according to the requirements of Regulation 26B(4), no later than 15 days after the end of the calendar month using the NOPSEMA Form – Recordable Environmental Incident Monthly Summary Report detailing:

- All recordable incidents that occurred during the calendar month.
- All material facts and circumstances concerning the recordable incidents that the operator knows or is able, by reasonable search or enquiry, to find out.
- Any action taken to avoid or mitigate any adverse environment impacts of the recordable incidents.
- The corrective action that has been taken, or is proposed to be taken, to prevent similar recordable incidents.
- The action that has been taken, or is proposed to be taken, to prevent a similar incident occurring in the future.

7.9.8 Other External Incident Reporting Requirements

In addition to notifying of and reporting environmental incidents defined under the Environment Regulations and Woodside requirements, **Table 7-4** describes the incident reporting requirements that also apply in the Operational Area.

For oil spill incidents, other agencies and organisations will be notified as appropriate to the nature and scale of the incident, as per procedures and contact lists in the [Woodside Oil Pollution Emergency Arrangements \(Australia\)](#) and Oil Pollution First Strike Plan (refer to **Appendix I**).

Woodside prioritises engagement with those persons who may be directly affected, either by the incident itself or in relation to the regulatory or decision-making capacity with respect to incident response. At the time of an oil spill incident, should it be identified that additional persons such as, but not limited to, commercial fishers, tourism operators or relevant cultural authorities who may be affected within the EMBA, Woodside would, at the relevant time, engage with these parties as appropriate

Table 7-4: External Incident Reporting Requirements

Event	Responsibility	Notifiable party	Notification requirements	Contact	Contact detail
Any marine incidents during Petroleum Activities Program	Vessel Master	AMSA	Incident Alert Form 18 as soon as reasonably practicable* Within 72 hours after becoming aware of the incident, submit Incident Report Form 19	AMSA	reports@amsa.gov.au
Oil pollution incidents in Commonwealth waters	Vessel Master	AMSA RCC	Without delay as per <i>Protection of the Sea Act</i> , part II, section 11(1), AMSA RCC notified verbally via the national emergency 24hour notification contact of the hydrocarbon spill; follow up with a written Pollution Report ASAP after verbal notification	AMSA RCC	Phone: 1800 641 792 or +61 2 6230 6811 AFTN: YSARYCYX
Any oil pollution incident which has the potential to enter a National Park or requires oil spill response activities to be conducted within a National Park	Woodside	DCCEEW	Reported verbally, ASAP	Director of National Parks	Phone: 02 6274 2220
Activity causes unintentional death of or injury to fauna species listed as Threatened or Migratory under the EPBC Act	Woodside	DCCEEW	Within seven days of becoming aware	Secretary of the DAWE	Phone: 1800 803 772 Email: protected.species@environment.gov.au

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The pollution activities should also be reported to AMSA via RCC Australia by the Vessel Master are:

- Any loss of significant plastic material (e.g. streamers).
- Garbage disposed of in the sea within 12 nm of land (garbage includes food, paper, bottles, etc.).
- Any loss of hazardous materials.

For oil spill incidents, other agencies and organisations will be notified as appropriate to the nature and scale of the incident as per procedures and contact lists in the [Oil Pollution Emergency Arrangements \(Australia\)](#) and the Scarborough 4D B1 MSS Oil Pollution First Strike Plan (refer to **Appendix I**).

External incident reporting requirements under the OPGGS (Safety) Regulations, including under sub-regulation 2.42, notices and reports of dangerous occurrences will be reported to NOPSEMA under the approved activity safety cases.

7.10 Emergency Preparedness and Response

7.10.1 Overview

Under Regulation 14(8), the implementation strategy must contain an Oil Pollution Emergency Plan (OPEP) and provide for updating the OPEP. Regulation 14(8AA) outlines the requirements for the OPEP which must include adequate arrangements for responding to and monitoring oil pollution.

A summary of how this EP and supporting documents address the various requirements of Environment Regulations relating to oil pollution response arrangements is shown in **Table 7-5**.

Table 7-5: Oil pollution and preparedness and response overview

Content	Environment Regulations Reference	Document/Section Reference
Details of (oil pollution response) control measures that will be used to reduce the impacts and risks of the activity to ALARP and an acceptable level	Regulation 13(5), (6), 14(3)	Oil Spill Preparedness and Response Mitigation Assessment (Appendix D)
Describes the OPEP	Regulation 14(8)	EP: Woodside's oil pollution emergency plan has the following components: Woodside Oil Pollution Emergency Arrangements (Australia) Oil Pollution First Strike Plan (Appendix I) Oil Spill Preparedness and Response Mitigation Assessment (Appendix D) In accordance with Regulation 31 of the Environmental Regulations the Woodside Oil Pollution Emergency Arrangements (Australia) was provided with the Julimar Phase 2 Drilling and Subsea Installation EP, accepted by NOPSEMA on 8 November 2019.
Details the arrangements for responding to and monitoring oil pollution (to inform response activities), including control measures	Regulation 14(8AA)	Oil Spill Preparedness and Response Mitigation Assessment (Appendix D) Oil Pollution First Strike Plan (Appendix I)

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Content	Environment Regulations Reference	Document/Section Reference
Details the arrangements for updating and testing the oil pollution response arrangements	Regulation 14(8), (8A), (8B), (8C)	EP: Section 7.11 Oil Spill Preparedness and Response Mitigation Assessment (Appendix D)
Details of provisions for monitoring impacts to the environment from oil pollution and response activities	Regulation 14(8D)	Oil Spill Preparedness and Response Mitigation Assessment (Appendix D)
Demonstrates that the oil pollution response arrangements are consistent with the national system for oil pollution preparedness and control	Regulation 14(8E)	Oil Pollution Emergency Arrangements (Australia)

7.10.2 Emergency Response Training

Regulation 14(5) requires that the implementation strategy includes measures to ensure that employees and contractors have the appropriate competencies and training (**Table 7-6**). Woodside has conducted a risk-based training needs analysis on positions required for effective oil spill response. Following the mapping of training to Woodside identified competencies, training was then mapped to positions based on their required competencies.

Table 7-6: Minimum levels of competency for key IMT positions

IMT Position	Minimum Competency
Corporate Incident Coordinate Centre (CICC) Leader	<ul style="list-style-type: none"> Incident and Crisis Leadership Development Program (ICLDP) Oil Spill Response Skills Enhancement Course (OSREC – internal course) Participation in L2 oil spill exercise (initial) Participation in L2 oil spill exercise (refresher)
Security & Emergency Manager Duty Manager	<ul style="list-style-type: none"> ICLDP OSREC IMO2 or equivalent spill response specialist level with an oil spill response organisation (OSRO) Participation in L2 oil spill exercise (initial) Participation in L2 oil spill exercise (refresher)
Operations, Planning, Logistics, Safety	<ul style="list-style-type: none"> OSREC ICC Fundamentals Course (internal course) Participation in L2 oil spill exercise (initial) Participation in L2 oil spill exercise (refresher)
Environment Coordinator	<ul style="list-style-type: none"> ICC Fundamentals OSREC IMO2 or equivalent spill response specialist level with an OSRO Participation in L2 oil spill exercise (initial) Participation in L2 oil spill exercise (refresh)

Note on competency/equivalency

In 2018 Woodside undertook a review of incident and crisis systems, processes and tools to assess whether these were fit-for purpose and has rolled out a change to the Incident and Crisis Management training and the oil spill response training requirements for both ICC and field-based roles.

Note on competency/equivalency

The revised ICC Fundamentals training Program and Incident and Crisis Leaders Development Program (ICLDP) align with the performance requirements of the *PMAOMIR320 – Manage Incident Response Information* and *PMAOM0R418 - Coordinate Incident Response*.

Regarding training specific equivalency:

- ICLDP is mapped to *PMAOM0R418* (and which is equivalent to IMOIII when combined with Woodside's OSREC course) and ensures broader incident management principles aligned with Australasian Inter-service Incident Management System (AIIMS).
- The revised ICC Fundamentals Course is mapped to *PMAOMIR320* (and which is equivalent to IMOII). The blended learning program offers modules aligned to IMOIII, IMOII, IMO I and AMOSC Core Group Training Oil Spill Response Organisation Specialist Level training.
- OSREC involves the completion of two (2) online AMSA Modules (Introduction to National Plan and Incident management; and Introduction to oil spills) as well as elements of IMO I and IMOII tailored to Woodside specific OSR capabilities.
- Woodside Learning Services (WLS) are responsible for collating and maintaining personnel training records. The HSP Dashboard reflects the competencies required for each oil spill role (IMT/operational).

7.10.3 Emergency Response Preparation

The Corporate Incident Coordination Centre (CICC), based in Woodside's head office in Perth, is the onshore coordination point for an offshore emergency. The CICC is staffed by an appropriately skilled team available on call 24-hours a day. The purpose of the team is to coordinate rescues, minimise damage to the environment and facilities, and to liaise with external agencies. A description of Woodside's Incident Command Structure and arrangements is further detailed in the Woodside OPEA (Australia). Roles and responsibilities for facility emergency response are outlined in the [Woodside Oil Pollution Emergency Arrangements \(Australia\)](#).

Woodside will have an Emergency Response Plan (ERP) in place relevant to the Petroleum Activities Program. The ERP provides procedural guidance specific to the asset and location of operations to control, coordinate and respond to an emergency or incident. The ERP will contain instructions for vessel emergency, medical emergency, search and rescue, reportable incidents, incident notification, contact information and activation of the contractor's emergency centre and Woodside Communication Centre (WCC).

In an emergency of any type, the Vessel Master will assume overall onsite command and act as the Incident Controller (IC). All persons aboard the vessel will be required to act under the IC's directions. The vessel will maintain communications with the onshore Project Manager and/or other emergency services. Emergency response support can be provided by the Contractor's emergency centre or WCC if requested by the IC.

The seismic vessel will have on-board equipment for responding to emergencies including medical, firefighting and hydrocarbon spill response equipment.

7.10.4 Oil and Other Hazardous Materials Spill

A significant hydrocarbon spill during the Petroleum Activities Program is unlikely, but should such an event occur, it has the potential to cause serious environmental and reputational damage if not managed properly. The [Woodside Oil Pollution Emergency Arrangements \(Australia\)](#) document, supported by the Oil Pollution First Strike Plan (**Appendix I**) which provides tactical response guidance to the activity/area. Spill response for this Petroleum Activities Program is described further in **Appendix D**.

The Security and Emergency Management Function is responsible for the management of Woodside's hydrocarbon spill response equipment, and for the maintenance of hydrocarbon spill preparedness and response documentation. In the event of a major spill, Woodside will request that AMSA (administrator of the National Plan) supports Woodside through advice and access to

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equipment, people and liaison. The interface and responsibilities, as defined under the National Plan, are described in the [Woodside Oil Pollution Emergency Arrangements \(Australia\)](#) document. AMSA and Woodside have a Memorandum of Understanding (MOU) in place to support Woodside in the event of an oil spill.

The seismic vessel and support vessel(s) will have a SOPEP in accordance with the requirements of MARPOL 73/78 Annex I. These plans outline responsibilities, specify procedures and identify resources available in a hydrocarbon or chemical spill from vessel activities. The Oil Pollution First Strike Plan is intended to work in conjunction with the SOPEPs and provides immediate actions required to commence a response if hydrocarbons are released to the marine environment.

Woodside has established environmental performance outcomes, performance standards and measurement criteria to be used for oil spill response during the Petroleum Activities Program, as detailed in **Appendix D**.

7.11 Emergency and Spill Response

Woodside categorises incidents in relation to response requirements as follows:

- **Level 1 Incident** – A Level 1 incident can be resolved through the use of existing resources, equipment and personnel. A Level 1 incident is contained, controlled and resolved by site/regionally based teams using existing resources and functional support services.
- **Level 2 Incident** – A Level 2 incident is characterised by a response that requires external operational support to manage the incident. It is triggered in the event the capabilities of the tactical level response are exceeded. This support is provided to the activity via the activation of all, or part of, the responsible ICC.
- **Level 3 Incident** – A Level 3 incident or crisis is identified as a critical event that seriously threatens the organisation's People, the Environment, company Assets, Reputation, Livelihood or essential Services. At Woodside, the Crisis Management Team (CMT) manages the strategic impacts in order to respond to and recover from the threat to the company (material impacts, litigation, legal and commercial, reputation, etc.). The CICC may also be activated as required to manage the operational response to the Level 3 Incident.

7.11.1 Emergency and Spill Response Drills and Exercises

Personnel holding responsibilities in a response will test the arrangements supporting the activities OPEP to ensure they are effective and communicated. Testing of Woodside's capability to respond to incidents will be conducted in alignment with the Emergency and Crisis Management Procedure. The scope, frequency and objective of these tests is described in **Table 7-7**. These arrangements are conducted in accordance with Regulation 14 (8B) of the OPGGS (Environment) Regulations 2009.

The company emergency response testing regime is aligned to existing or developing risks associated with Woodside's operations and activities. Corporate hazards/risks outlined in the corporate risk register, respective Safety Cases or project Risk Registers, are the key reference point for emergency management and crisis management exercising schedule development. External participants may be invited to attend crisis exercises and may include government agencies, specialist service providers, hydrocarbon spill response organisations or industry members with which Woodside has mutual aid arrangements.

The objective is to exercise procedures, skills and teamwork of the Emergency Response and Command Teams in their ability to respond to emergency situations. After each exercise, the team holds a debrief session, during which the exercise is reviewed and reported. Any lessons learnt or areas for improvement are identified and incorporated into emergency procedures where appropriate.

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Spill response exercise reports and key participants will be maintained in the Woodside IMS system.

Table 7-7: Testing of response capability

Response Category	Scope	Response Testing Frequency	Response Testing Objective
Level 1 Response	Exercises are project-/ activity-specific	One Level 1 'First Strike' drill conducted within two weeks of activity commencement.	Comprehensive exercises test elements of the Oil Pollution First Strike Plan (Appendix I). Emergency drills are scheduled to test other aspects of the Emergency Response Plan.
Level 2 Response	Exercises are vessel specific	A minimum of one Emergency Management exercise per campaign.	Testing both the facility IMT response and/or that of the CICC following handover of incident control.
Level 3 Response	Exercises are relevant to all Woodside assets	The number of CMT exercises conducted each year is determined by the Chief Executive Officer, in consultation with the Vice President of Security and Emergency Management.	Test Woodside's ability to respond to and manage a crisis level incident.

7.11.2 Hydrocarbon Spill Response Testing of Arrangements

Woodside is required to test hydrocarbon spill response arrangements as per regulations 8B and 8C of the Environment Regulations. Woodside's arrangements for spill response are common across its Australian operating assets and activities to ensure the controls are consistent. The overall objective of testing these arrangements is to ensure that Woodside maintains an ability to respond to a hydrocarbon spill, specifically to:

- ensure relevant responders, contractors and key personnel understand and practise their assigned roles and responsibilities
- test response arrangements and actions to validate response plans
- ensure lessons learned are incorporated into Woodside's processes and procedures and improvements are made where required.

If new response arrangements are introduced, or existing arrangements significantly amended, additional testing is undertaken accordingly. Additional activities or activity locations are not anticipated to occur; however, if they do, testing of relevant response arrangements will be undertaken as soon as practicable.

In addition to the testing of response capability described in **Table 7-7**, up to eight formal exercises are planned annually, across Woodside, to specifically test arrangements for responding to a hydrocarbon spill to the marine environment.

7.11.2.1 Testing of Arrangements Schedule

Woodside's Testing of Arrangements Schedule (**Figure 7-1**) aligns with international good practice for spill preparedness and response management; the testing is compatible with the IPIECA Good Practice Guide and the Australian Emergency Management Institute Handbook. If a spill occurs, enacting these arrangements will underpin Woodside's ability to implement a response across its petroleum activities. **Figure 7-1** shows a condensed snapshot of Woodside's 5-year rolling Testing of Arrangements Schedule.

HSP TESTING OF ARRANGEMENTS SCHEDULE
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5 YEAR ROLLING SCHEDULE		Area to be tested	
Arrangement	Support Agency / Company	Discussion Based (DPSC LK)	Operations Based
1	WEL		
2	WEL		
3	WEL		
4	AMOSC		
5	AMOSC		
6	OSPL		
7	OSPL		
8	Worley Parsons		
9	Worley Parsons		
10	EPRI		
11	EPRI		
12	Jacobs		
13	Jacobs		
14	AMSA		
15	AMSA		
16	DOT (Department of Transport)		
17	DOT (Department of Transport)		
18	WEL		
19	RP'S APLUSA		
20	KSAT		
21	Blomovs		
22	NSPC		
23	Sol Aero		
24	Coronation		
25	Husco/E Ink		
26	Freightson		
27	Seares		
28	Seares		
29	Full Permal		
30	North Air Work		
31	Emouth, Alcockama		
32	Bruner International Repair		
33	Leamouth Airport		
34	Emouth Freight and Logistics		
35	Veolia		
36	IFEC		
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Figure 7-1: Indicative 5-yearly testing of arrangements schedule

(Snapshot of a selection of oil spill response arrangements tested annually; Note: schedule is subject to change, additional detail is included in the live document)

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Numbered hydrocarbon spill arrangements listed in the rows of the schedule are taken from the support plans and operational plans described in Section 1.4 of **Appendix D**. Each arrangement has a support agency/company and an area to be tested (e.g. capability, equipment and personnel). For example, an arrangement could be to test Woodside's personnel capability for conducting scientific monitoring, or the ability of the Australian Marine Oil Spill Centre to provide response personnel and equipment. About 75 hydrocarbon spill preparedness arrangements are tested annually across the eight planned exercises, as described above.

The vertical columns under each year in **Figure 7-1** relate to an individual exercise or additional assurance actions that are conducted over the 5-year rolling schedule. The sub-heading for the column describes the standard method of testing (e.g. discussion exercise, desktop exercise), and the blue cells indicate the arrangements that could be tested for each method.

Arrangements in the schedule are tested at least once a year; however, some arrangements may be tested across multiple exercises (e.g. critical arrangements) or via other 'additional assurance' methods outside the formal Testing of Arrangements Schedule that also constitute sufficient evidence of testing of arrangements (e.g. audits, no-notice drills, internal exercises, assurance drills) (refer to the first and second vertical columns for each year in **Figure 7-1**).

7.11.2.2 Exercises, Objectives, and KPIs

Exercises are designed to cumulatively provide assurance for all arrangements within Woodside's Testing of Arrangements Schedule annually across all facilities. Exercise-initiating scenarios are derived from the worst-case credible scenarios as described in the relevant facility's First Strike Plans.

Objectives and KPIs for each exercise are determined by reviewing:

- The Testing of Arrangements Schedule, which identifies which arrangements can be tested for each testing method (**Section 7.11.2**).
- The objectives and KPIs master generic plan, which summarises generic objectives and KPIs that could be tested for specific response strategies, based on industry good practice guidance (i.e. IPIECA) for testing oil spill arrangements.
- The oil spill ALARP commitments register, which summarises all spill response commitments from accepted EPs (e.g. timings, numbers) for different response strategies, and considers priority commitments and worst-cast spill scenarios.
- Actions undertaken from recommendations from previous exercises, where relevant.

The required capabilities, number of personnel, equipment, and timeframes (i.e. arrangements) form specific KPIs during an exercise. Where this is the case, the ALARP commitments register indicates the specific response strategy performance standards to use/test the arrangements against. Where relevant the most stringent performance standard across all in-force EPs is used as the KPI. After each exercise, a report is produced that includes recommendations for improvements, which are then converted to actions and tracked in the Testing of Arrangements Register.

Additional assurance actions are also routinely undertaken outside formal exercises (e.g. response audits, no-notice drills), which support testing of these arrangements. Evidence and outcomes from additional assurance actions are used, where relevant, to support testing individual arrangements, including from external sources (e.g. evidence of suppliers testing their own arrangements).

7.12 Severe Weather Preparation

The activity is scheduled to occur outside of the typical cyclone season (November to April), however cyclones have been known to develop outside of season, between July and October. The seismic

vessel contractor must have a Severe Weather Procedure, or equivalent, in place outlining the processes and procedures that would be implemented during a severe weather event.

The seismic vessel will receive daily forecasts. If a severe weather event is forecast, the path and its development will be plotted and monitored using the forecast data. If there is the potential for the severe weather event to affect the Petroleum Activities Program, the Severe Weather Procedure will be actioned.

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9 LIST OF TERMS AND ACRONYMS

Acronym	Description
@	At
~	Approximately
<	Less/fewer than
>	Greater/more than
≤	Less than or equal to
≥	Greater than or equal to
°C	Degrees Celsius
24/7	24 hours a day, seven days a week
3D	Three-dimensional
ABARES	Australian Bureau of Agricultural and Resource Economics and Sciences
AFMA	Australian Fisheries Management Authority
AHO	Australian Hydrographic Office
AIS	Automated identification system
ALARP	As low as reasonably practicable
AMP	Australian Marine Park
AMSA	Australian Maritime Safety Authority
ANIMAT	Animal Movement And Exposure Modelling
ANSI	American National Standards Institute
APPEA	Australian Petroleum Production and Exploration Association
AS/NZS	Australian Standard/New Zealand Standard
ASMA	Australian Maritime Safety Authority
ATSB	Australian Transport Safety Bureau
BIA	Biologically Important Area
BMSL	Below Mean Sea Level
BOEM	Bureau of Ocean Energy Management
BP	Boiling Point
CAES	Catch and Effort System
cm	Centimetre
cm ³	Cubic centimetre
CO ₂	Carbon dioxide
CONOPS	Concurrent Operations
CP	Cathodic protection
CS	Cost/Sacrifice
CSIRO	Commonwealth Scientific and Industrial Research Organisation
CV	Company Value
DAWE	Former Department of Agriculture, Water and the Environment (now DCCEEW)
db 1 μPa ² m ² s	Decibels relative to one micropascal squared, metres squared, per second

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Acronym	Description
dB re 1 μ Pa	Decibels relative to one micropascal; the unit used to measure the intensity of an underwater sound
dB re 1 μ Pa ² ·s	Decibels relative to one micropascal squared, per second
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEH	Department of Environment and Heritage
DEWHA	Former Commonwealth Department of the Environment, Water, Heritage and the Arts (now DCCEEW)
DFO	Department of Fisheries and Oceans
DIS	Draft International Standard
DNP	Director of National Parks
DoEE	Commonwealth Department of the Environment and Energy
DoIMMS	Department of the Interior, Minerals Management Service
DPIRD	Western Australian Department of Primary Industries and Regional Development
DRIMS	Document Retrieval Integrated Management System
DSEWPaC	Former Commonwealth Department of Sustainability, Environment, Water, Population and Communities (now DCCEEW)
DWH	Deepwater Horizon
EMBA	Environment that may be affected
ENVID	Environment Identification (study)
EP	Environment Plan
EPBC	Environmental Protection Biodiversity Conservation
EPO	Environmental Performance Outcome
EPS	Environment Performance Standard
ERM	Environmental Resource Management
ESD	Ecologically Sustainable Development
F	Control feasibility
F-Pil	Flatback turtle – Pilbara stock
FRC	Fast Rescue Craft
GNSS	Global Navigation Satellite System
G-NWS	Green turtle – North West Shelf stock
GP	Good Industry Practice
GPS	Global Positioning System
HAZID	Hazard identification (study)
HF	High Frequency
HSE	Health, Safety, and Environment
H-WA	Hawksbill turtle – Western Australia stock
IAGC	International Association of Geophysical Contractors
IAPP	International Air Pollution Prevention
IMCRA	Integrated Marine and Coastal Regionalisation of Australia

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Acronym	Description
IMO	International Maritime Organisation
IMS	Invasive Marine Species
INPEX	International Petroleum Exploration
IOPP	International Oil Pollution Prevention
IPIECA	International Petroleum Industry Environmental Conservation Association
ISO	International Organization for Standardization
ISPP	International Sewage Pollution Prevention
ITOPF	International Tanker Owners Pollution Federation Ltd
IUCN	International Union for the Conservation of Nature
JASCO	Japan American Society of Central Ohio
JASMINE	JASCO Animal Simulation Model Including Noise Exposure
JRCC	Joint Rescue Coordination Centre
JSA	Job Safety Analysis
KEF	Key Ecological Feature
kHz	Kilohertz
km	Kilometre
L	Litre
LCS	Legislation, Codes and Standards
L _{E,24h}	Cumulative sound exposure over a 24-hour period
LF	Low Frequency
LH-WA	Loggerhead turtle – Western Australia stock
LNG	Liquefied Natural Gas
LP	Low Pressure
L _{S,E}	Per-pulse source SEL
L _{S,PK}	Peak Source Pressure
m	Metre
m/s	Metres per second
m ²	Square metre
m ³	Cubic metre
MARPOL	The International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978.
MC	Measurement Criteria
MDO	Marine diesel oil
MEMS	Micro electro mechanical system
MF	Mid Frequency
MNES	Matters of National Environmental Significance
MOD	Maximum-Over-Depth
MOPO	Manual of Permitted Operation
MP	Master Plan

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Acronym	Description
MPA	Marine Protected Area
MSIN	Maritime Safety Information Notifications
MSS	Marine Seismic Survey
n.d.	No date
N/A	Not Applicable
NIMS	Non-indigenous Marine Species
NLPG	National Light Pollution Guidelines
Nm	Nautical Mile
NMFS	National Marine Fisheries Service (US)
NNE	North North East
NOAA	National Oceanic and Atmospheric Administration (US)
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
NO _x	Oxides of nitrogen
NRC	North Rankin Complex
NSF	National Science Foundation
NTM	Notice to Mariners
NW	North West
NWMR	North-west Marine Region
NWS	North West Shelf
OBN	Ocean Bottom Node
OCNS	Offshore Chemical Notification Scheme
OIW	Oil in water
PAM	Passive Acoustic Monitoring
PEIS	Programatic Environmental Impact Statement
PENV	Pendoley Environmental
PJ	Professional Judgement
PK	Zero-to-peak sound pressure
PK-PK	Peak-to-peak sound pressure
PMI	Potential Mortality Injury
PMST	Protected Matters Search Tool
ppb	Parts per billion
ppm	Parts per million
PS	Performance Standard
PTS	Permanent threshold shift
RBA	Risk-based Analysis
RMS	Root Mean Square
ROV	Remotely operated vehicle
RPS	Rural Planning Services

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Acronym	Description
SEL	Sound Exposure Level
SIMAP	Spill Impact Mapping and Analysis program
SMPEP	Spill Monitoring Programme Execution Plan
SNA	Safe Navigation Area
SOLAS	Safety Of Life At Sea
SOPEP	Ship Oil Pollution Emergency Plan
SPL	Sound pressure level
SSE	South South East
SV	Societal Value
SWMR	South-west Marine Region
TAP	Threat Abatement Plan
TGS	Tomlinson Geophysical Services
TSSC	Threatened Species Scientific Committee
TTS	Temporary threshold shift
UK	United Kingdom
US	United States
USBL	Ultra-Short Baseline Acoustic Positioning System
VOC	Volatile Organic Compound
WA	Western Australia
WAFIC	Western Australian Fishing Industry Council
WDCS	Whale and Dolphin Conservation Society
WHP	World Heritage Property
WMS	Woodside Management System
WNW	West North West

Appendix A WOODSIDE ENVIRONMENT AND RISK MANAGEMENT POLICIES

WOODSIDE POLICY

Environment and Biodiversity Policy

OBJECTIVE

Woodside recognises the intrinsic value of nature and the importance of conserving biodiversity and ecosystem services to support the sustainable development of our society. We are committed to doing our part. We understand and embrace our responsibility to undertake activities in an environmentally sustainable way.

PRINCIPLES

Woodside commits to:

- Implementing a systematic approach to the management of the impacts and risks of our operating activities on an ongoing basis, including emissions and air quality, discharge and waste management, water management, biodiversity and protected areas.
- Applying the mitigation hierarchy principle (avoid, minimise, restore) and a continuous improvement approach to ensure we maintain compliance, improve resource use efficiency and reduce our environmental impacts.
- Embedding environmental and biodiversity management, and opportunities, in our business planning and decision making processes.
- Complying with relevant laws and regulations and applying responsible standards where laws do not exist.
- Not undertaking new exploration or development of hydrocarbons within the boundaries of natural sites on the UNESCO World Heritage List (as specified at 1 December 2022). Existing activity may continue if compatible with maintenance of the listed outstanding universal values.
- Not undertaking new exploration or development of hydrocarbons within IUCN Protected Areas (as specified at 1 December 2022) unless compatible with management plans in place for the area. Existing activity may continue if compatible with management plans in place for the area.
- Achieving net zero deforestation¹ associated with new projects that take a Final Investment Decision (FID) after 1 December 2022.
- Developing Biodiversity Action Plans for all new major projects (CAPEX >USD\$2 billion) that take a FID after 1 December 2022.
- Supporting positive biodiversity outcomes in regions and areas in which we operate.
- Setting targets and publicly reporting on our environmental and biodiversity performance.

APPLICABILITY

Responsibility for the application of this Policy rests with all Woodside employees, contractors and joint venturers engaged in activities under Woodside operational control. Woodside managers are also responsible for promotion of this Policy in non-operated joint ventures.

This Policy will be reviewed regularly and updated as required.

Approved by the Woodside Energy Group Ltd Board in December 2022.

¹ Definition of Forest: 'trees higher than 5 meters and a canopy cover of more than 10 percent on the land to be cleared'

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WOODSIDE POLICY**Health and Safety Policy****OBJECTIVES**

At Woodside we believe that process and personal safety related incidents, and occupational illnesses are preventable. We strive to be an industry leader in health and safety and are committed to managing our activities to minimise adverse health and safety risk related impacts.

PRINCIPLES

Woodside will achieve this by:

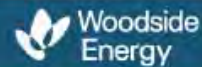
- Implementing a systematic approach to health, personal safety, and process safety risk management.
- Maintaining a culture in which everybody is aware of their health and safety obligations and are empowered to speak up and intervene on health and safety issues.
- Identifying current and emerging hazards across the value chain activities to reduce risks to as low as reasonably practicable.
- Embedding health and safety management in our business planning and decision-making processes.
- Integrating health, personal safety and process safety requirements when designing, purchasing, constructing, and modifying equipment and facilities including requiring our contractors to comply with our HSE expectations in a mutually beneficial manner.
- Complying with relevant laws and regulations and applying responsible standards where laws do not exist.
- Setting targets and publicly reporting on our health and safety performance to help us continually improve.

APPLICABILITY

Responsibility for the application of this Policy rests with all Woodside employees, contractors and joint venturers engaged in activities under Woodside operational control. Woodside leaders are also responsible for promotion of this Policy in non-operated joint ventures.

This Policy will be reviewed regularly and updated as required.

Revised by the Woodside Energy Group Ltd Board in December 2022

WOODSIDE POLICY**Risk Management Policy****OBJECTIVES**

Woodside recognises that risk is inherent in our business and the effective management of risk is vital to deliver our strategic objectives, continued growth and success. We are committed to managing risks in a proactive and effective manner as a source of competitive advantage.

Our approach protects us against potential negative impacts, enables us to take risk for reward and improves our resilience against emerging risks. The objective of our risk management framework is to provide a single consolidated view of risks across the company to understand our full risk exposure and prioritise risk management and governance.

The success of our approach lies in the responsibility placed on everyone at all levels to proactively identify, assess and treat risks relating to the objectives they are accountable for delivering.

PRINCIPLES

Woodside achieves these objectives by:

- Applying a structured and comprehensive framework for the identification, assessment and treatment of current risks and response to emerging risks;
- Ensuring line of sight of financial and non-financial risks at appropriate levels of the organisation;
- Demonstrating leadership and commitment to integrating risk management into our business activities and governance practices;
- Recognising the value of stakeholder engagement, best available information and proactive identification of potential changes in external and internal context;
- Embedding risk management into our critical business processes and control framework;
- Understanding our exposure to risk and tolerance for uncertainty to inform our decision making and assure that Woodside is operating with due regard to the risk appetite endorsed by the Board; and
- Evaluating and improving the effectiveness and efficiency our approach.

APPLICABILITY

The Managing Director of Woodside is accountable to the Board of Directors for ensuring this Policy is effectively implemented.

Responsibility for the application of this Policy rests with all Woodside employees, contractors and joint venturers engaged in activities under Woodside operational control. Woodside managers are also responsible for promotion of this Policy in non-operated joint ventures.

This Policy will be reviewed regularly and updated as required.

Reviewed by the Woodside Energy Group Ltd Board in December 2022.

Appendix B RELEVANT REQUIREMENTS

The table below refers to Commonwealth Legislation related to the project.

Commonwealth Legislation	Legislation Summary
<p><i>Air Navigation Act 1920</i> Air Navigation Regulations 1947 Air Navigation (Aerodrome Flight Corridors) Regulations 1994 Air Navigation (Aircraft Engine Emissions) Regulations 1995 Air Navigation (Aircraft Noise) Regulations 1984 Air Navigation (Fuel Spillage) Regulations 1999</p>	<p>This Act relates to the management of air navigation.</p>
<p><i>Australian Maritime Safety Authority Act 1990</i></p>	<p>This Act establishes a legal framework for the Australian Maritime Safety Authority (AMSA), which represents the Australian Government and international forums in the development, implementation and enforcement of international standards including those governing ship safety and marine environment protection. AMSA is responsible for administering the Marine Orders in Commonwealth waters.</p>
<p><i>Australian Radiation Protection and Nuclear Safety Act 1998</i></p>	<p>This Act relates to the protection of the health and safety of people, and the protection of the environment from the harmful effects of radiation.</p>
<p><i>Biosecurity Act 2015</i> Quarantine Regulations 2000 Biosecurity Regulation 2016 Australian Ballast Water Management Requirements 2017</p>	<p>This Act provides the Commonwealth with powers to take measures of quarantine, and implement related programs as are necessary, to prevent the introduction of any plant, animal, organism or matter that could contain anything that could threaten Australia's native flora and fauna or natural environment. The Commonwealth's powers include powers of entry, seizure, detention and disposal.</p> <p>This Act includes mandatory controls on the use of seawater as ballast in ships and the declaration of sea vessels voyaging out of and into Commonwealth waters. The Regulations stipulate that all information regarding the voyage of the vessel and the ballast water is declared correctly to the quarantine officers.</p>
<p><i>Environment Protection and Biodiversity Conservation Act 1999</i> Environment Protection and Biodiversity Conservation Regulations 2000</p>	<p>This Act protects matters of national environmental significance (NES). It streamlines the national environmental assessment and approvals process, protects Australian biodiversity and integrates management of important natural and culturally significant places.</p> <p>Under this Act, actions that may be likely to have a significant impact on matters of NES must be referred to the Commonwealth Environment Minister.</p>
<p><i>Environment Protection (Sea Dumping) Act 1981</i> Environment Protection (Sea Dumping) Regulations 1983</p>	<p>This Act provides for the protection of the environment by regulating dumping matter into the sea, incineration of waste at sea and placement of artificial reefs.</p>
<p><i>Industrial Chemicals (Notification and Assessment Act) 1989</i> Industrial Chemicals (Notification and Assessment) Regulations 1990</p>	<p>This Act creates a national register of industrial chemicals. The Act also provides for restrictions on the use of certain chemicals which could have harmful effects on the environment or health.</p>
<p><i>National Environment Protection Measures (Implementation) Act 1998</i></p>	<p>This Act and Regulations provide for the implementation of National Environment Protection Measures (NEPMS) to protect, restore and enhance the quality of the environment in</p>

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Commonwealth Legislation	Legislation Summary
National Environment Protection Measures (Implementation) Regulations 1999	Australia and ensure that the community has access to relevant and meaningful information about pollution. The National Environment Protection Council has made NEPMs relating to ambient air quality, the movement of controlled waste between states and territories, the national pollutant inventory, and used packaging materials.
<i>National Greenhouse and Energy Reporting Act 2007</i> National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015	This Act and associated Rule establishes the legislative framework for the NGER scheme for reporting greenhouse gas emissions and energy consumption and production by corporations in Australia.
<i>Navigation Act 2012</i> Marine order 12 – Construction – subdivision and stability, machinery and electrical installations Marine order 30 - Prevention of collisions Marine order 47 - Mobile offshore drilling units Marine order 57 - Helicopter operations Marine order 60 - Floating offshore facilities Marine order 91 - Marine pollution prevention—oil Marine order 93 - Marine pollution prevention—noxious liquid substances Marine order 94 - Marine pollution prevention—packaged harmful substances Marine order 96 - Marine pollution prevention—sewage Marine order 97 - Marine pollution prevention—air pollution	This Act regulates navigation and shipping including Safety of Life at Sea (SOLAS). The Act will apply to some activities of the MODU and project vessels. This Act is the primary legislation that regulates ship and seafarer safety, shipboard aspects of marine environment protection and pollution prevention.
<i>Offshore Petroleum and Greenhouse Gas Storage Act 2006</i> Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2011 Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009	This Act is the principal Act governing offshore petroleum exploration and production in Commonwealth waters. Specific environmental, resource management and safety obligations are set out in the Regulations listed.
<i>Ozone Protection and Synthetic Greenhouse Gas Management Act 1989</i> Ozone Protection and Synthetic Greenhouse Gas Management Regulations 1995	This Act provides for measures to protect ozone in the atmosphere by controlling and ultimately reducing the manufacture, import and export of ozone depleting substances (ODS) and synthetic greenhouse gases, and replacing them with suitable alternatives. The Act will only apply to Woodside if it manufactures, imports or exports ozone depleting substances.
<i>Protection of the Sea (Powers of Intervention) Act 1981</i>	This Act authorises the Commonwealth to take measures for the purpose of protecting the sea from pollution by oil and other noxious substances discharged from ships and provides legal immunity for persons acting under an AMSA direction.
<i>Protection of the Sea (Prevention of Pollution from Ships) Act 1983</i> Protection of the Sea (Prevention of Pollution from Ships) (Orders) Regulations 1994 Marine order 91 - Marine pollution prevention—oil Marine order 93 - Marine pollution prevention—noxious liquid substances	This Act relates to the protection of the sea from pollution by oil and other harmful substances discharged from ships. Under this Act, discharge of oil or other harmful substances from ships into the sea is an offence. There is also a requirement to keep records of the ships dealing with such substances. The Act applies to all Australian ships, regardless of their location. It applies to foreign ships operating between 3 nautical miles (nm) off the coast out to the end of the Australian Exclusive Economic Zone (200 nm). It also applies

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Commonwealth Legislation	Legislation Summary
<p>Marine order 94 - Marine pollution prevention—packaged harmful substances</p> <p>Marine order 95 - Marine pollution prevention—garbage</p> <p>Marine order 96 - Marine pollution prevention—sewage</p> <p>Maritime Legislation Amendment (Prevention of Air Pollution from Ships) Act 2007</p> <p>MARPOL Convention</p>	<p>within the 3 nm of the coast where the State/Northern Territory does not have complementary legislation.</p> <p>All the Marine Orders listed, except for Marine Order 95, are enacted under both the Navigation Act 2012 and the Protection of the Sea (Prevention of Pollution from Ships) Act 1983.</p> <p>This Act is an amendment to the Protection of the Sea (Prevention of Pollution from Ships) Act 1983. This amended Act provides the protection of the sea from pollution by oil and other harmful substances discharged from ships.</p>
<p><i>Protection of the Sea (Harmful Antifouling Systems) Act 2006</i></p> <p>Marine order 98—(Marine pollution prevention—anti-fouling systems)</p>	<p>This Act relates to the protection of the sea from the effects of harmful anti-fouling systems. It prohibits the application or reapplication of harmful anti-fouling compounds on Australian ships or foreign ships that are in an Australian shipping facility.</p>
<p><i>Underwater Cultural Heritage Act 2018</i></p>	<p>This act relates to the identification, protection and conservation of Australia's underwater heritage and enables the implementation of national and international maritime heritage responsibilities.</p> <p>There is currently draft guidelines for working in the near and offshore environment to protect underwater heritage with the aim to provide direction on addressing the Act obligations for developments and to promote best practice for identifying, assessing and protecting underwater cultural heritage.</p>

Appendix C EPBC ACT PROTECTED MATTERS SEARCH REPORTS

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Woodside ID: 1401760303

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Uncontrolled when printed. Refer to electronic version for most up to date information.



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected. Please see the caveat for interpretation of information provided here.

Report created: 25-Jan-2023

[Summary](#)

[Details](#)

[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

[Acknowledgements](#)

Matters of National Environment Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	None
National Heritage Places:	None
Wetlands of International Importance (Ramsar)	None
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	1
Listed Threatened Ecological Communities:	None
Listed Threatened Species:	14
Listed Migratory Species:	26

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <https://www.dcceew.gov.au/parks-heritage/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Lands:	None
Commonwealth Heritage Places:	None
Listed Marine Species:	17
Whales and Other Cetaceans:	25
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	None
Habitat Critical to the Survival of Marine Turtles:	None

Extra Information

This part of the report provides information that may also be relevant to the area you have

State and Territory Reserves:	None
Regional Forest Agreements:	None
Nationally Important Wetlands:	None
EPBC Act Referrals:	26
Key Ecological Features (Marine):	1
Biologically Important Areas:	2
Bioregional Assessments:	None
Geological and Bioregional Assessments:	None

Details

Matters of National Environmental Significance

Commonwealth Marine Area

[\[Resource Information \]](#)

Approval is required for a proposed activity that is located within the Commonwealth Marine Area which has, will have, or is likely to have a significant impact on the environment. Approval may be required for a proposed action taken outside a Commonwealth Marine Area but which has, may have or is likely to have a significant impact on the environment in the Commonwealth Marine Area.

Feature Name

EEZ and Territorial Sea

Listed Threatened Species

[\[Resource Information \]](#)

Status of Conservation Dependent and Extinct are not MNES under the EPBC Act.

Number is the current name ID.

Scientific Name	Threatened Category	Presence Text
BIRD		
Calidris canutus		
Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Macronectes giganteus		
Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Phaethon lepturus fulvus		
Christmas Island White-tailed Tropicbird, Golden Bosunbird [26021]	Endangered	Species or species habitat may occur within area
FISH		
Thunnus maccoyii		
Southern Bluefin Tuna [69402]	Conservation Dependent	Breeding known to occur within area
MAMMAL		
Balaenoptera borealis		
Sei Whale [34]	Vulnerable	Species or species habitat likely to occur within area
Balaenoptera musculus		
Blue Whale [36]	Endangered	Migration route known to occur within area

Scientific Name	Threatened Category	Presence Text
Balaenoptera physalus Fin Whale [37]	Vulnerable	Species or species habitat likely to occur within area

REPTILE

Caretta caretta Loggerhead Turtle [1763]	Endangered	Species or species habitat likely to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Species or species habitat likely to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Species or species habitat likely to occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Species or species habitat likely to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Species or species habitat likely to occur within area

SHARK

Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat may occur within area
Sphyrna lewini Scalloped Hammerhead [85267]	Conservation Dependent	Species or species habitat may occur within area

Listed Migratory Species [[Resource Information](#)]

Scientific Name	Threatened Category	Presence Text
Migratory Marine Birds		
Anous stolidus Common Noddy [825]		Species or species habitat may occur within area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Phaethon lepturus White-tailed Tropicbird [1014]		Species or species habitat may occur within area
Migratory Marine Species		
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Species or species habitat likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Species or species habitat likely to occur within area
Carcharhinus longimanus Oceanic Whitetip Shark [84108]		Species or species habitat may occur within area
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat may occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Species or species habitat likely to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Species or species habitat likely to occur within area

Scientific Name	Threatened Category	Presence Text
<i>Dermochelys coriacea</i> Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Species or species habitat likely to occur within area
<i>Eretmochelys imbricata</i> Hawksbill Turtle [1766]	Vulnerable	Species or species habitat likely to occur within area
<i>Isurus oxyrinchus</i> Shortfin Mako, Mako Shark [79073]		Species or species habitat likely to occur within area
<i>Isurus paucus</i> Longfin Mako [82947]		Species or species habitat likely to occur within area
<i>Megaptera novaeangliae</i> Humpback Whale [38]		Species or species habitat may occur within area
<i>Mobula birostris</i> as <i>Manta birostris</i> Giant Manta Ray [90034]		Species or species habitat may occur within area
<i>Natator depressus</i> Flatback Turtle [59257]	Vulnerable	Species or species habitat likely to occur within area
<i>Orcinus orca</i> Killer Whale, Orca [46]		Species or species habitat may occur within area
<i>Physeter macrocephalus</i> Sperm Whale [59]		Species or species habitat may occur within area
Migratory Wetlands Species		
<i>Actitis hypoleucos</i> Common Sandpiper [59309]		Species or species habitat may occur within area
<i>Calidris acuminata</i> Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area

Other Matters Protected by the EPBC Act

Listed Marine Species		[Resource Information]
Scientific Name	Threatened Category	Presence Text
Bird		
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat may occur within area
Anous stolidus Common Noddy [825]		Species or species habitat may occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area overfly marine area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area overfly marine area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat may occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Phaethon lepturus White-tailed Tropicbird [1014]	421	Species or species habitat may occur within area
Phaethon lepturus fulvus Christmas Island White-tailed Tropicbird, Golden Bosunbird [26021]	Endangered	Species or species habitat may occur within area

Reptile

Aipysurus laevis Olive Seasnake [1120]		Species or species habitat may occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Species or species habitat likely to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Species or species habitat likely to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Species or species habitat likely to occur within area
Disteira kingii Spectacled Seasnake [1123]		Species or species habitat may occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Species or species habitat likely to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Species or species habitat likely to occur within area
Pelamis platurus Yellow-bellied Seasnake [1091]		Species or species habitat may occur within area

Whales and Other Cetaceans		[Resource Information]
Current Scientific Name	Status	Type of Presence
Mammal		

Current Scientific Name	Status	Type of Presence
Balaenoptera acutorostrata Minke Whale [33]		Species or species habitat may occur within area
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Species or species habitat likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Species or species habitat likely to occur within area
Delphinus delphis Common Dolphin, Short-beaked Common Dolphin [60]		Species or species habitat may occur within area
Feresa attenuata Pygmy Killer Whale [61]		Species or species habitat may occur within area
Globicephala macrorhynchus Short-finned Pilot Whale [62]		Species or species habitat may occur within area
Grampus griseus Risso's Dolphin, Grampus [64]		Species or species habitat may occur within area
Kogia breviceps Pygmy Sperm Whale [57]		Species or species habitat may occur within area

Current Scientific Name	Status	Type of Presence
Kogia sima as Kogia simus Dwarf Sperm Whale [85043]	423	Species or species habitat may occur within area
Lagenodelphis hosei Fraser's Dolphin, Sarawak Dolphin [41]		Species or species habitat may occur within area
Megaptera novaeangliae Humpback Whale [38]		Species or species habitat may occur within area
Mesoplodon densirostris Blainville's Beaked Whale, Dense-beaked Whale [74]		Species or species habitat may occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Peponocephala electra Melon-headed Whale [47]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Species or species habitat may occur within area
Pseudorca crassidens False Killer Whale [48]		Species or species habitat likely to occur within area
Stenella attenuata Spotted Dolphin, Pantropical Spotted Dolphin [51]		Species or species habitat may occur within area
Stenella coeruleoalba Striped Dolphin, Euphrosyne Dolphin [52]		Species or species habitat may occur within area
Stenella longirostris Long-snouted Spinner Dolphin [29]		Species or species habitat may occur within area

Current Scientific Name	Status	Type of Presence
Steno bredanensis Rough-toothed Dolphin [30]	424	Species or species habitat may occur within area
Tursiops truncatus s. str. Bottlenose Dolphin [68417]		Species or species habitat may occur within area
Ziphius cavirostris Cuvier's Beaked Whale, Goose-beaked Whale [56]		Species or species habitat may occur within area

Extra Information

EPBC Act Referrals			[Resource Information]
Title of referral	Reference	Referral Outcome	Assessment Status
Project Highclere Cable Lay and Operation	2022/09203		Completed
Controlled action			
Equus Gas Fields Development Project, Carnarvon Basin	2012/6301	Controlled Action	Completed
Gorgon Gas Development 4th Train Proposal	2011/5942	Controlled Action	Post-Approval
The Scarborough Project - FLNG & assoc subsea infrastructure, Carnarvon Basin	2013/6811	Controlled Action	Post-Approval
Not controlled action			
Bollinger 2D Seismic Survey 200km North of North West Cape WA	2004/1868	Not Controlled Action	Completed
Cazadores 2D seismic survey	2004/1720	Not Controlled Action	Completed
Controlled Source Electromagnetic Survey	2007/3262	Not Controlled Action	Completed
Hess Exploration Drilling Programme	2007/3566	Not Controlled Action	Completed
Project Highclere Geophysical Survey	2021/9023	Not Controlled Action	Completed
Not controlled action (particular manner)			

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
2D marine seismic survey	2012/6296	Not Controlled Action (Particular Manner)	Post-Approval
3D Marine Seismic Survey in Permit Areas WA-15-R, WA-18-R, WA-205-P, WA-253-P, WA-267-P and WA-268-P	2003/1271	Not Controlled Action (Particular Manner)	Post-Approval
3D marine seismic survey over petroleum title WA-268-P	2007/3458	Not Controlled Action (Particular Manner)	Post-Approval
3D Marine Seismic Surveys - Contos CT-13 & Supertubes CT-13, offshore WA	2013/6901	Not Controlled Action (Particular Manner)	Post-Approval
Bonaventure 3D seismic survey	2006/2514	Not Controlled Action (Particular Manner)	Post-Approval
CGGVERITAS 2010 2D Seismic Survey	2010/5714	Not Controlled Action (Particular Manner)	Post-Approval
Deep Water Drilling Program	2010/5532	Not Controlled Action (Particular Manner)	Post-Approval
Deep Water Northwest Shelf 2D Seismic Survey	2007/3260	Not Controlled Action (Particular Manner)	Post-Approval
Drilling 35-40 offshore exploration wells in deep water	2008/4461	Not Controlled Action (Particular Manner)	Post-Approval
Exmouth West 2D Marine Seismic Survey	2008/4132	Not Controlled Action (Particular Manner)	Post-Approval
Geco Eagle 3D Marine Seismic Survey	2008/3958	Not Controlled Action (Particular Manner)	Post-Approval
Glencoe 3D Marine Seismic Survey WA-390-P	2007/3684	Not Controlled Action (Particular Manner)	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
		Manner)	
Honeycombs MC3D Marine Seismic Survey	2012/6368	Not Controlled Action (Particular Manner)	Post-Approval
Leopard 2D marine seismic survey	2005/2290	Not Controlled Action (Particular Manner)	Post-Approval
Lion 2D Marine Seismic Survey	2007/3777	Not Controlled Action (Particular Manner)	Post-Approval
Sovereign 3D Marine Seismic Survey	2011/5861	Not Controlled Action (Particular Manner)	Post-Approval
Westralia SPAN Marine Seismic Survey, WA & NT	2012/6463	Not Controlled Action (Particular Manner)	Post-Approval

Key Ecological Features [[Resource Information](#)]

Key Ecological Features are the parts of the marine ecosystem that are considered to be important for the biodiversity or ecosystem functioning and integrity of the Commonwealth Marine Area.

Name	Region
Exmouth Plateau	North-west

Biologically Important Areas

Scientific Name	Behaviour	Presence
Whales		
Balaenoptera musculus brevicauda Pygmy Blue Whale [81317]	Distribution	Known to occur
Balaenoptera musculus brevicauda Pygmy Blue Whale [81317]	Migration	Known to occur

Caveat

1 PURPOSE

This report is designed to assist in identifying the location of matters of national environmental significance (MNES) and other matters protected by the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) which may be relevant in determining obligations and requirements under the EPBC Act.

The report contains the mapped locations of:

- World and National Heritage properties;
- Wetlands of International and National Importance;
- Commonwealth and State/Territory reserves;
- distribution of listed threatened, migratory and marine species;
- listed threatened ecological communities; and
- other information that may be useful as an indicator of potential habitat value.

2 DISCLAIMER

This report is not intended to be exhaustive and should only be relied upon as a general guide as mapped data is not available for all species or ecological communities listed under the EPBC Act (see below). Persons seeking to use the information contained in this report to inform the referral of a proposed action under the EPBC Act should consider the limitations noted below and whether additional information is required to determine the existence and location of MNES and other protected matters.

Where data are available to inform the mapping of protected species, the presence type (e.g. known, likely or may occur) that can be determined from the data is indicated in general terms. It is the responsibility of any person using or relying on the information in this report to ensure that it is suitable for the circumstances of any proposed use. The Commonwealth cannot accept responsibility for the consequences of any use of the report or any part thereof. To the maximum extent allowed under governing law, the Commonwealth will not be liable for any loss or damage that may be occasioned directly or indirectly through the use of, or reliance

3 DATA SOURCES

Threatened ecological communities

For threatened ecological communities where the distribution is well known, maps are generated based on information contained in recovery plans, State vegetation maps and remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species

Threatened, migratory and marine species distributions have been discerned through a variety of methods. Where distributions are well known and if time permits, distributions are inferred from either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc.) together with point locations and described habitat; or modelled (MAXENT or BIOCLIM habitat modelling) using

Where little information is available for a species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc.).

In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More detailed distribution mapping methods are used to update these distributions

4 LIMITATIONS

The following species and ecological communities have not been mapped and do not appear in this report:

- threatened species listed as extinct or considered vagrants;
- some recently listed species and ecological communities;
- some listed migratory and listed marine species, which are not listed as threatened species; and
- migratory species that are very widespread, vagrant, or only occur in Australia in small numbers.

The following groups have been mapped, but may not cover the complete distribution of the species:

- listed migratory and/or listed marine seabirds, which are not listed as threatened, have only been mapped for recorded
- seals which have only been mapped for breeding sites near the Australian continent

The breeding sites may be important for the protection of the Commonwealth Marine environment.

Refer to the metadata for the feature group (using the Resource Information link) for the currency of the information.

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [-Office of Environment and Heritage, New South Wales](#)
- [-Department of Environment and Primary Industries, Victoria](#)
- [-Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [-Department of Environment, Water and Natural Resources, South Australia](#)
- [-Department of Land and Resource Management, Northern Territory](#)
- [-Department of Environmental and Heritage Protection, Queensland](#)
- [-Department of Parks and Wildlife, Western Australia](#)
- [-Environment and Planning Directorate, ACT](#)
- [-Birdlife Australia](#)
- [-Australian Bird and Bat Banding Scheme](#)
- [-Australian National Wildlife Collection](#)
- [-Natural history museums of Australia](#)
- [-Museum Victoria](#)
- [-Australian Museum](#)
- [-South Australian Museum](#)
- [-Queensland Museum](#)
- [-Online Zoological Collections of Australian Museums](#)
- [-Queensland Herbarium](#)
- [-National Herbarium of NSW](#)
- [-Royal Botanic Gardens and National Herbarium of Victoria](#)
- [-Tasmanian Herbarium](#)
- [-State Herbarium of South Australia](#)
- [-Northern Territory Herbarium](#)
- [-Western Australian Herbarium](#)
- [-Australian National Herbarium, Canberra](#)
- [-University of New England](#)
- [-Ocean Biogeographic Information System](#)
- [-Australian Government, Department of Defence](#)
- [Forestry Corporation, NSW](#)
- [-Geoscience Australia](#)
- [-CSIRO](#)
- [-Australian Tropical Herbarium, Cairns](#)
- [-eBird Australia](#)
- [-Australian Government – Australian Antarctic Data Centre](#)
- [-Museum and Art Gallery of the Northern Territory](#)
- [-Australian Government National Environmental Science Program](#)
- [-Australian Institute of Marine Science](#)
- [-Reef Life Survey Australia](#)
- [-American Museum of Natural History](#)
- [-Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [-Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- [-Other groups and individuals](#)

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact us](#) page.

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Department of Climate Change, Energy, the Environment and Water

GPO Box 3090

Canberra ACT 2601 Australia

+61 2 6274 1111



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected. Please see the caveat for interpretation of information provided here.

Report created: 16-Jan-2023

[Summary](#)

[Details](#)

[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

[Acknowledgements](#)

Matters of National Environment Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	None
National Heritage Places:	None
Wetlands of International Importance (Ramsar)	None
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	2
Listed Threatened Ecological Communities:	None
Listed Threatened Species:	27
Listed Migratory Species:	43

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <https://www.dcceew.gov.au/parks-heritage/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Lands:	None
Commonwealth Heritage Places:	None
Listed Marine Species:	68
Whales and Other Cetaceans:	30
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	3
Habitat Critical to the Survival of Marine Turtles:	3

Extra Information

This part of the report provides information that may also be relevant to the area you have

State and Territory Reserves:	None
Regional Forest Agreements:	None
Nationally Important Wetlands:	None
EPBC Act Referrals:	98
Key Ecological Features (Marine):	4
Biologically Important Areas:	9
Bioregional Assessments:	None
Geological and Bioregional Assessments:	None

Details

Matters of National Environmental Significance

Commonwealth Marine Area

[\[Resource Information \]](#)

Approval is required for a proposed activity that is located within the Commonwealth Marine Area which has, will have, or is likely to have a significant impact on the environment. Approval may be required for a proposed action taken outside a Commonwealth Marine Area but which has, may have or is likely to have a significant impact on the environment in the Commonwealth Marine Area.

Feature Name

EEZ and Territorial Sea

Extended Continental Shelf

Listed Threatened Species

[\[Resource Information \]](#)

Status of Conservation Dependent and Extinct are not MNES under the EPBC Act.
Number is the current name ID.

Scientific Name	Threatened Category	Presence Text
BIRD		
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
Papasula abbotti Abbott's Booby [59297]	Endangered	Species or species habitat may occur within area
Phaethon lepturus fulvus Christmas Island White-tailed Tropicbird, Golden Bosunbird [26021]	Endangered	Species or species habitat may occur within area

Scientific Name	Threatened Category ⁴³³	Presence Text
Pterodroma mollis Soft-plumaged Petrel [1036]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Sternula nereis nereis Australian Fairy Tern [82950]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
FISH		
Thunnus maccoyii Southern Bluefin Tuna [69402]	Conservation Dependent	Breeding known to occur within area
MAMMAL		
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Eubalaena australis Southern Right Whale [40]	Endangered	Species or species habitat may occur within area
REPTILE		
Caretta caretta Loggerhead Turtle [1763]	Endangered	Species or species habitat known to occur within area

Scientific Name	Threatened Category ⁴³⁴	Presence Text
Chelonia mydas Green Turtle [1765]	Vulnerable	Species or species habitat known to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Species or species habitat known to occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Species or species habitat known to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Congregation or aggregation known to occur within area
SHARK		
Carcharias taurus (west coast population) Grey Nurse Shark (west coast population) [68752]	Vulnerable	Species or species habitat may occur within area
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat known to occur within area
Pristis clavata Dwarf Sawfish, Queensland Sawfish [68447]	Vulnerable	Species or species habitat known to occur within area
Pristis pristis Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish [60756]	Vulnerable	Species or species habitat likely to occur within area
Pristis zijsron Green Sawfish, Dindagubba, Narrowsnout Sawfish [68442]	Vulnerable	Species or species habitat known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Sphyrna lewini Scalloped Hammerhead [85267]	Conservation Dependent	Species or species habitat likely to occur within area

Scientific Name	Threatened Category	Presence Text
Migratory Marine Birds		
Anous stolidus Common Noddy [825]		Species or species habitat may occur within area
Ardenna carneipes Flesh-footed Shearwater, Fleshy-footed Shearwater [82404]		Species or species habitat may occur within area
Calonectris leucomelas Streaked Shearwater [1077]		Species or species habitat likely to occur within area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat likely to occur within area
Fregata minor Great Frigatebird, Greater Frigatebird [1013]		Species or species habitat may occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Phaethon lepturus White-tailed Tropicbird [1014]		Species or species habitat may occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Migratory Marine Species		
Anoxypristis cuspidata Narrow Sawfish, Knifetooth Sawfish [68448]		Species or species habitat may occur within area
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area

Scientific Name	Threatened Category ⁴³⁶	Presence Text
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Carcharhinus longimanus Oceanic Whitetip Shark [84108]		Species or species habitat likely to occur within area
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat known to occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Species or species habitat known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Species or species habitat known to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Species or species habitat known to occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Species or species habitat known to occur within area
Eubalaena australis as Balaena glacialis australis Southern Right Whale [40]	Endangered	Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Isurus oxyrinchus Shortfin Mako, Mako Shark [79073]	437	Species or species habitat likely to occur within area
Isurus paucus Longfin Mako [82947]		Species or species habitat likely to occur within area
Lamna nasus Porbeagle, Mackerel Shark [83288]		Species or species habitat may occur within area
Megaptera novaeangliae Humpback Whale [38]		Species or species habitat known to occur within area
Mobula alfredi as Manta alfredi Reef Manta Ray, Coastal Manta Ray [90033]		Species or species habitat known to occur within area
Mobula birostris as Manta birostris Giant Manta Ray [90034]		Species or species habitat known to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Congregation or aggregation known to occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Species or species habitat may occur within area
Pristis clavata Dwarf Sawfish, Queensland Sawfish [68447]	Vulnerable	Species or species habitat known to occur within area
Pristis pristis Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish [60756]	Vulnerable	Species or species habitat likely to occur within area

Scientific Name	Threatened Category ⁴³⁸	Presence Text
Pristis zijsron Green Sawfish, Dindagubba, Narrow snout Sawfish [68442]	Vulnerable	Species or species habitat known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Tursiops aduncus (Arafura/Timor Sea populations) Spotted Bottlenose Dolphin (Arafura/Timor Sea populations) [78900]		Species or species habitat known to occur within area
Migratory Wetlands Species		
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat may occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
Pandion haliaetus Osprey [952]		Species or species habitat known to occur within area

Listed Marine Species		[Resource Information]
Scientific Name	Threatened Category	Presence Text
Bird		
Actitis hypoleucos		
Common Sandpiper [59309]		Species or species habitat may occur within area
Anous stolidus		
Common Noddy [825]		Species or species habitat may occur within area
Ardenna carneipes as Puffinus carneipes		
Flesh-footed Shearwater, Fleshy-footed Shearwater [82404]		Species or species habitat may occur within area
Calidris acuminata		
Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris canutus		
Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area overfly marine area
Calidris ferruginea		
Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area overfly marine area
Calidris melanotos		
Pectoral Sandpiper [858]		Species or species habitat may occur within area overfly marine area
Calonectris leucomelas		
Streaked Shearwater [1077]		Species or species habitat likely to occur within area
Fregata ariel		
Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat likely to occur within area

Scientific Name	Threatened Category	Presence Text
Fregata minor Great Frigatebird, Greater Frigatebird [1013]	440	Species or species habitat may occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
Pandion haliaetus Osprey [952]		Species or species habitat known to occur within area
Papasula abbotti Abbott's Booby [59297]	Endangered	Species or species habitat may occur within area
Phaethon lepturus White-tailed Tropicbird [1014]		Species or species habitat may occur within area
Phaethon lepturus fulvus Christmas Island White-tailed Tropicbird, Golden Bosunbird [26021]	Endangered	Species or species habitat may occur within area
Pterodroma mollis Soft-plumaged Petrel [1036]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Fish		
Acentronura larsonae Helen's Pygmy Pipehorse [66186]		Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Bulbonaricus brauni Braun's Pughead Pipefish, Pug-headed Pipefish [66189]	441	Species or species habitat may occur within area
Campichthys tricarinatus Three-keel Pipefish [66192]		Species or species habitat may occur within area
Choeroichthys brachysoma Pacific Short-bodied Pipefish, Short-bodied Pipefish [66194]		Species or species habitat may occur within area
Choeroichthys latispinosus Muiron Island Pipefish [66196]		Species or species habitat may occur within area
Choeroichthys suillus Pig-snouted Pipefish [66198]		Species or species habitat may occur within area
Doryrhamphus dactyliophorus Banded Pipefish, Ringed Pipefish [66210]		Species or species habitat may occur within area
Doryrhamphus janssi Cleaner Pipefish, Janss' Pipefish [66212]		Species or species habitat may occur within area
Doryrhamphus multiannulatus Many-banded Pipefish [66717]		Species or species habitat may occur within area
Doryrhamphus negrosensis Flagtail Pipefish, Masthead Island Pipefish [66213]		Species or species habitat may occur within area
Festucalex scalaris Ladder Pipefish [66216]		Species or species habitat may occur within area
Filicampus tigris Tiger Pipefish [66217]		Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Halicampus brocki Brock's Pipefish [66219]	442	Species or species habitat may occur within area
Halicampus grayi Mud Pipefish, Gray's Pipefish [66221]		Species or species habitat may occur within area
Halicampus nitidus Glittering Pipefish [66224]		Species or species habitat may occur within area
Halicampus spinirostris Spiny-snout Pipefish [66225]		Species or species habitat may occur within area
Haliichthys taeniophorus Ribbioned Pipehorse, Ribbioned Seadragon [66226]		Species or species habitat may occur within area
Hippichthys penicillus Beady Pipefish, Steep-nosed Pipefish [66231]		Species or species habitat may occur within area
Hippocampus angustus Western Spiny Seahorse, Narrow-bellied Seahorse [66234]		Species or species habitat may occur within area
Hippocampus histrix Spiny Seahorse, Thorny Seahorse [66236]		Species or species habitat may occur within area
Hippocampus kuda Spotted Seahorse, Yellow Seahorse [66237]		Species or species habitat may occur within area
Hippocampus planifrons Flat-face Seahorse [66238]		Species or species habitat may occur within area
Hippocampus trimaculatus Three-spot Seahorse, Low-crowned Seahorse, Flat-faced Seahorse [66720]		Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Micrognathus micronotopterus Tidepool Pipefish [66255]	443	Species or species habitat may occur within area
Phoxocampus belcheri Black Rock Pipefish [66719]		Species or species habitat may occur within area
Solegnathus hardwickii Pallid Pipehorse, Hardwick's Pipehorse [66272]		Species or species habitat may occur within area
Solegnathus lettiensis Gunther's Pipehorse, Indonesian Pipefish [66273]		Species or species habitat may occur within area
Solenostomus cyanopterus Robust Ghostpipefish, Blue-finned Ghost Pipefish, [66183]		Species or species habitat may occur within area
Syngnathoides biaculeatus Double-end Pipehorse, Double-ended Pipehorse, Alligator Pipefish [66279]		Species or species habitat may occur within area
Trachyrhamphus bicoarctatus Bentstick Pipefish, Bend Stick Pipefish, Short-tailed Pipefish [66280]		Species or species habitat may occur within area
Trachyrhamphus longirostris Straightstick Pipefish, Long-nosed Pipefish, Straight Stick Pipefish [66281]		Species or species habitat may occur within area
Reptile		
Acalyptophis peronii Horned Seasnake [1114]		Species or species habitat may occur within area
Aipysurus duboisii Dubois' Seasnake [1116]		Species or species habitat may occur within area
Aipysurus eydouxii Spine-tailed Seasnake [1117]		Species or species habitat may occur within area

Scientific Name	Threatened Category	Presence Text
Aipysurus laevis Olive Seasnake [1120]		Species or species habitat may occur within area
Astrotia stokesii Stokes' Seasnake [1122]		Species or species habitat may occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Species or species habitat known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Species or species habitat known to occur within area
Chitulia ornata as Hydrophis ornatus Spotted Seasnake, Ornate Reef Seasnake [87377]		Species or species habitat may occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Species or species habitat known to occur within area
Disteira kingii Spectacled Seasnake [1123]		Species or species habitat may occur within area
Disteira major Olive-headed Seasnake [1124]		Species or species habitat may occur within area
Emydocephalus annulatus Turtle-headed Seasnake [1125]		Species or species habitat may occur within area
Ephalophis greyi North-western Mangrove Seasnake [1127]		Species or species habitat may occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Species or species habitat known to occur within area

Scientific Name	Threatened Category	Presence Text
Hydrophis elegans Elegant Seasnake [1104]	445	Species or species habitat may occur within area
Leioselasma czeblukovi as Hydrophis czeblukovi Fine-spined Seasnake, Geometrical Seasnake [87374]		Species or species habitat may occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Congregation or aggregation known to occur within area
Pelamis platurus Yellow-bellied Seasnake [1091]		Species or species habitat may occur within area

Whales and Other Cetaceans [Resource Information]

Current Scientific Name	Status	Type of Presence
Mammal		
Balaenoptera acutorostrata Minke Whale [33]		Species or species habitat may occur within area
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area

Current Scientific Name	Status	Type of Presence
Delphinus delphis Common Dolphin, Short-beaked Common Dolphin [60]	446	Species or species habitat may occur within area
Eubalaena australis Southern Right Whale [40]	Endangered	Species or species habitat may occur within area
Feresa attenuata Pygmy Killer Whale [61]		Species or species habitat may occur within area
Globicephala macrorhynchus Short-finned Pilot Whale [62]		Species or species habitat may occur within area
Grampus griseus Risso's Dolphin, Grampus [64]		Species or species habitat may occur within area
Indopacetus pacificus Longman's Beaked Whale [72]		Species or species habitat may occur within area
Kogia breviceps Pygmy Sperm Whale [57]		Species or species habitat may occur within area
Kogia sima as Kogia simus Dwarf Sperm Whale [85043]		Species or species habitat may occur within area
Lagenodelphis hosei Fraser's Dolphin, Sarawak Dolphin [41]		Species or species habitat may occur within area
Megaptera novaeangliae Humpback Whale [38]		Species or species habitat known to occur within area
Mesoplodon densirostris Blainville's Beaked Whale, Dense- beaked Whale [74]		Species or species habitat may occur within area

Current Scientific Name	Status	Type of Presence
Mesoplodon ginkgodens Ginkgo-toothed Beaked Whale, Ginkgo-toothed Whale, Ginkgo Beaked Whale [59564]	447	Species or species habitat may occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Peponocephala electra Melon-headed Whale [47]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Species or species habitat may occur within area
Pseudorca crassidens False Killer Whale [48]		Species or species habitat likely to occur within area
Stenella attenuata Spotted Dolphin, Pantropical Spotted Dolphin [51]		Species or species habitat may occur within area
Stenella coeruleoalba Striped Dolphin, Euphrosyne Dolphin [52]		Species or species habitat may occur within area
Stenella longirostris Long-snouted Spinner Dolphin [29]		Species or species habitat may occur within area
Steno bredanensis Rough-toothed Dolphin [30]		Species or species habitat may occur within area
Tursiops aduncus Indian Ocean Bottlenose Dolphin, Spotted Bottlenose Dolphin [68418]		Species or species habitat may occur within area
Tursiops aduncus (Arafura/Timor Sea populations) Spotted Bottlenose Dolphin (Arafura/Timor Sea populations) [78900]		Species or species habitat known to occur within area

Current Scientific Name	Status	Type of Presence
Tursiops truncatus s. str. Bottlenose Dolphin [68417]	448	Species or species habitat may occur within area
Ziphius cavirostris Cuvier's Beaked Whale, Goose-beaked Whale [56]		Species or species habitat may occur within area

Australian Marine Parks [Resource Information]

Park Name	Zone & IUCN Categories
Gascoyne	Habitat Protection Zone (IUCN IV)
Gascoyne	Multiple Use Zone (IUCN VI)
Gascoyne	National Park Zone (IUCN II)

Habitat Critical to the Survival of Marine Turtles

Scientific Name	Behaviour	Presence
Aug - Sep		
Natator depressus Flatback Turtle [59257]	Nesting	Known to occur
Dec - Jan		
Chelonia mydas Green Turtle [1765]	Nesting	Known to occur
Nov - May		
Eretmochelys imbricata Hawksbill Turtle [1766]	Nesting	Known to occur

Extra Information

EPBC Act Referrals [Resource Information]

Title of referral	Reference	Referral Outcome	Assessment Status
Project Highclere Cable Lay and Operation	2022/09203		Completed
Controlled action			
'Van Gogh' Petroleum Field Development	2007/3213	Controlled Action	Post-Approval
Construct and operate LNG & domestic gas plant including	2008/4469	Controlled Action	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Controlled action			
onshore and offshore facilities - Wheatston			
Develop Jansz-Lo deepwater gas field in Permit Areas WA-18-R, WA-25-R and WA-26-	2005/2184	Controlled Action	Post-Approval
Development of Coniston/Novara fields within the Exmouth Sub-basin	2011/5995	Controlled Action	Post-Approval
Development of Stybarrow petroleum field incl drilling and facility installation	2004/1469	Controlled Action	Post-Approval
Enfield full field development	2001/257	Controlled Action	Post-Approval
Equus Gas Fields Development Project, Carnarvon Basin	2012/6301	Controlled Action	Completed
Gorgon Gas Development	2003/1294	Controlled Action	Post-Approval
Gorgon Gas Development 4th Train Proposal	2011/5942	Controlled Action	Post-Approval
Greater Enfield (Vincent) Development	2005/2110	Controlled Action	Post-Approval
Pyrenees Oil Fields Development	2005/2034	Controlled Action	Post-Approval
The Scarborough Project - FLNG & assoc subsea infrastructure, Carnarvon Basin	2013/6811	Controlled Action	Post-Approval
Vincent Appraisal Well	2000/22	Controlled Action	Post-Approval
Not controlled action			
'Van Gogh' Oil Appraisal Drilling Program, Exploration Permit Area WA-155-P(1)	2006/3148	Not Controlled Action	Completed
Bollinger 2D Seismic Survey 200km North of North West Cape WA	2004/1868	Not Controlled Action	Completed
Bultaco-2, Laverda-2, Laverda-3 and Montesa-2 Appraisal Wells	2000/103	Not Controlled Action	Completed
Carnarvon 3D Marine Seismic Survey	2004/1890	Not Controlled Action	Completed
Cazadores 2D seismic survey	2004/1720	Not Controlled Action	Completed

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action			
Controlled Source Electromagnetic Survey	2007/3262	Not Controlled Action	Completed
Exploration drilling well WA-155-P(1)	2003/971	Not Controlled Action	Completed
Exploration Well in Permit Area WA-155-P(1)	2002/759	Not Controlled Action	Completed
Exploratory drilling in permit area WA-225-P	2001/490	Not Controlled Action	Completed
HCA05X Macedon Experimental Survey	2004/1926	Not Controlled Action	Completed
Hess Exploration Drilling Programme	2007/3566	Not Controlled Action	Completed
Jansz-2 and 3 Appraisal Wells	2002/754	Not Controlled Action	Completed
Klammer 2D Seismic Survey	2002/868	Not Controlled Action	Completed
Montesa-1 and Bultaco-1 Exploration Wells	2000/102	Not Controlled Action	Completed
Project Highclere Geophysical Survey	2021/9023	Not Controlled Action	Completed
Subsea Gas Pipeline From Stybarrow Field to Griffin Venture Gas Export Pipeline	2005/2033	Not Controlled Action	Completed
Wanda Offshore Research Project, 80 km north-east of Exmouth, WA	2018/8293	Not Controlled Action	Completed
Not controlled action (particular manner)			
'Kate' 3D marine seismic survey, exploration permits WA-320-P and WA-345-P, 60km	2005/2037	Not Controlled Action (Particular Manner)	Post-Approval
2D and 3D seismic surveys	2005/2151	Not Controlled Action (Particular Manner)	Post-Approval
2D marine seismic survey	2012/6296	Not Controlled Action (Particular Manner)	Post-Approval
3D marine seismic survey	2008/4281	Not Controlled Action (Particular Manner)	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
3D Marine Seismic Survey in Permit Areas WA-15-R, WA-18-R, WA-205-P, WA-253-P, WA-267-P and WA-268-P	2003/1271	Not Controlled Action (Particular Manner)	Post-Approval
3D marine seismic survey over petroleum title WA-268-P	2007/3458	Not Controlled Action (Particular Manner)	Post-Approval
3D Marine Seismic Surveys - Contos CT-13 & Supertubes CT-13, offshore WA	2013/6901	Not Controlled Action (Particular Manner)	Post-Approval
3D seismic survey	2006/2715	Not Controlled Action (Particular Manner)	Post-Approval
3D Seismic Survey, WA	2008/4428	Not Controlled Action (Particular Manner)	Post-Approval
Agrippina 3D Seismic Marine Survey	2009/5212	Not Controlled Action (Particular Manner)	Post-Approval
Apache Northwest Shelf Van Gogh Field Appraisal Drilling Program	2007/3495	Not Controlled Action (Particular Manner)	Post-Approval
Aperio 3D Marine Seismic Survey, WA	2012/6648	Not Controlled Action (Particular Manner)	Post-Approval
Australia to Singapore Fibre Optic Submarine Cable System	2011/6127	Not Controlled Action (Particular Manner)	Post-Approval
Babylon 3D Marine Seismic Survey, Commonwealth Waters, nr Exmouth WA	2013/7081	Not Controlled Action (Particular Manner)	Post-Approval
Bonaventure 3D seismic survey	2006/2514	Not Controlled Action (Particular Manner)	Post-Approval
CGGVERITAS 2010 2D Seismic Survey	2010/5714	Not Controlled Action (Particular	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
		Manner)	
Charon 3D Marine Seismic Survey	2007/3477	Not Controlled Action (Particular Manner)	Post-Approval
CVG 3D Marine Seismic Survey	2012/6654	Not Controlled Action (Particular Manner)	Post-Approval
Deep Water Drilling Program	2010/5532	Not Controlled Action (Particular Manner)	Post-Approval
Deep Water Northwest Shelf 2D Seismic Survey	2007/3260	Not Controlled Action (Particular Manner)	Post-Approval
Draeck 3D Marine Seismic Survey, WA-205-P	2006/3067	Not Controlled Action (Particular Manner)	Post-Approval
Drilling 35-40 offshore exploration wells in deep water	2008/4461	Not Controlled Action (Particular Manner)	Post-Approval
Eendracht Multi-Client 3D Marine Seismic Survey	2009/4749	Not Controlled Action (Particular Manner)	Post-Approval
Enfield M3 & Vincent 4D Marine Seismic Surveys	2008/3981	Not Controlled Action (Particular Manner)	Completed
Enfield M3 4D, Vincent 4D & 4D Line Test Marine Seismic Surveys	2008/4122	Not Controlled Action (Particular Manner)	Post-Approval
Enfield M4 4D Marine Seismic Survey	2008/4558	Not Controlled Action (Particular Manner)	Post-Approval
Enfield oilfield 3D Seismic Survey	2006/3132	Not Controlled Action (Particular Manner)	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
Exmouth West 2D Marine Seismic Survey	2008/4132	Not Controlled Action (Particular Manner)	Post-Approval
Foxhound 3D Non-Exclusive Marine Seismic Survey	2009/4703	Not Controlled Action (Particular Manner)	Post-Approval
Geco Eagle 3D Marine Seismic Survey	2008/3958	Not Controlled Action (Particular Manner)	Post-Approval
Glencoe 3D Marine Seismic Survey WA-390-P	2007/3684	Not Controlled Action (Particular Manner)	Post-Approval
Guacamole 2D Marine Seismic Survey	2008/4381	Not Controlled Action (Particular Manner)	Post-Approval
Harmony 3D Marine Seismic Survey	2012/6699	Not Controlled Action (Particular Manner)	Post-Approval
Honeycombs MC3D Marine Seismic Survey	2012/6368	Not Controlled Action (Particular Manner)	Post-Approval
Huzzas MC3D Marine Seismic Survey (HZ-13) Carnarvon Basin, offshore WA	2013/7003	Not Controlled Action (Particular Manner)	Post-Approval
Huzzas phase 2 marine seismic survey, Exmouth Plateau, Northern Carnarvon Basin, WA	2013/7093	Not Controlled Action (Particular Manner)	Post-Approval
INDIGO Marine Cable Route Survey (INDIGO)	2017/7996	Not Controlled Action (Particular Manner)	Post-Approval
Klimt 2D Marine Seismic Survey	2007/3856	Not Controlled Action (Particular Manner)	Post-Approval
Laverda 3D Marine Seismic Survey and Vincent M1 4D Marine Seismic Survey	2010/5415	Not Controlled Action (Particular Manner)	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
		Manner)	
Leopard 2D marine seismic survey	2005/2290	Not Controlled Action (Particular Manner)	Post-Approval
Lion 2D Marine Seismic Survey	2007/3777	Not Controlled Action (Particular Manner)	Post-Approval
Marine reconnaissance survey	2008/4466	Not Controlled Action (Particular Manner)	Post-Approval
Munmorah 2D seismic survey within permits WA-308/9-P	2003/970	Not Controlled Action (Particular Manner)	Post-Approval
Ocean Bottom Cable Seismic Program, WA-264-P	2007/3844	Not Controlled Action (Particular Manner)	Post-Approval
Ocean Bottom Cable Seismic Survey	2005/2017	Not Controlled Action (Particular Manner)	Post-Approval
Orcus 3D Marine Seismic Survey in WA-450-P	2010/5723	Not Controlled Action (Particular Manner)	Post-Approval
Osprey and Dionysus Marine Seismic Survey	2011/6215	Not Controlled Action (Particular Manner)	Post-Approval
Palta-1 exploration well in Petroleum Permit Area WA-384-P	2011/5871	Not Controlled Action (Particular Manner)	Post-Approval
Pyrenees 4D Marine Seismic Monitor Survey, HCA12A	2012/6579	Not Controlled Action (Particular Manner)	Post-Approval
Pyrenees-Macedon 3D marine seismic survey	2005/2325	Not Controlled Action (Particular Manner)	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
Rydal-1 Petroleum Exploration Well, WA	2012/6522	Not Controlled Action (Particular Manner)	Post-Approval
Salsa 3D Marine Seismic Survey	2010/5629	Not Controlled Action (Particular Manner)	Post-Approval
Skorpion Marine Seismic Survey WA	2001/416	Not Controlled Action (Particular Manner)	Post-Approval
Sovereign 3D Marine Seismic Survey	2011/5861	Not Controlled Action (Particular Manner)	Post-Approval
Stybarrow 4D Marine Seismic Survey	2011/5810	Not Controlled Action (Particular Manner)	Post-Approval
Stybarrow Baseline 4D marine seismic survey	2008/4530	Not Controlled Action (Particular Manner)	Post-Approval
Tortilla 2D Seismic Survey, WA	2011/6110	Not Controlled Action (Particular Manner)	Post-Approval
Triton 3D Marine Seismic Survey, WA-2-R and WA-3-R	2006/2609	Not Controlled Action (Particular Manner)	Post-Approval
Undertake a three dimensional marine seismic survey	2010/5679	Not Controlled Action (Particular Manner)	Post-Approval
Vincent M1 and Enfield M5 4D Marine Seismic Survey	2010/5720	Not Controlled Action (Particular Manner)	Post-Approval
Warramunga Non-Inclusive 3D Seismic Survey	2008/4553	Not Controlled Action (Particular Manner)	Post-Approval
West Anchor 3D Marine Seismic Survey	2008/4507	Not Controlled Action (Particular	Post-Approval

Title of referral	Reference	Referral Outcome	Assessment Status
Not controlled action (particular manner)			
		Manner)	
Westralia SPAN Marine Seismic Survey, WA & NT	2012/6463	Not Controlled Action (Particular Manner)	Post-Approval
Referral decision			
Bianchi 3D Marine Seismic Survey, Carnavon Basin, WA	2013/7078	Referral Decision	Completed
CVG 3D Marine Seismic Survey	2012/6270	Referral Decision	Completed
Enfield 4D Marine Seismic Surveys, Production Permit WA-28-L	2005/2370	Referral Decision	Completed
Stybarrow Baseline 4D Marine Seismic Survey (Permit Areas WA-255-P, WA-32-L, WA-	2008/4165	Referral Decision	Completed

Key Ecological Features [[Resource Information](#)]

Key Ecological Features are the parts of the marine ecosystem that are considered to be important for the biodiversity or ecosystem functioning and integrity of the Commonwealth Marine Area.

Name	Region
Ancient coastline at 125 m depth contour	North-west
Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula	North-west
Continental Slope Demersal Fish Communities	North-west
Exmouth Plateau	North-west

Biologically Important Areas

Scientific Name	Behaviour	Presence
Marine Turtles		
Caretta caretta		
Loggerhead Turtle [1763]	Internesting buffer	Known to occur
Chelonia mydas		
Green Turtle [1765]	Internesting buffer	Known to occur
Natator depressus		
Flatback Turtle [59257]	Internesting buffer	Known to occur

Seabirds

Scientific Name	Behaviour	Presence
Ardenna pacifica Wedge-tailed Shearwater [84292]	Breeding	Known to occur
Sharks		
Rhincodon typus Whale Shark [66680]	Foraging	Known to occur
Whales		
Balaenoptera musculus brevipinna Pygmy Blue Whale [81317]	Distribution	Known to occur
Balaenoptera musculus brevipinna Pygmy Blue Whale [81317]	Foraging	Known to occur
Balaenoptera musculus brevipinna Pygmy Blue Whale [81317]	Migration	Known to occur
Megaptera novaeangliae Humpback Whale [38]	Migration (north and south)	Known to occur

Caveat

1 PURPOSE

This report is designed to assist in identifying the location of matters of national environmental significance (MNES) and other matters protected by the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) which may be relevant in determining obligations and requirements under the EPBC Act.

The report contains the mapped locations of:

- World and National Heritage properties;
- Wetlands of International and National Importance;
- Commonwealth and State/Territory reserves;
- distribution of listed threatened, migratory and marine species;
- listed threatened ecological communities; and
- other information that may be useful as an indicator of potential habitat value.

2 DISCLAIMER

This report is not intended to be exhaustive and should only be relied upon as a general guide as mapped data is not available for all species or ecological communities listed under the EPBC Act (see below). Persons seeking to use the information contained in this report to inform the referral of a proposed action under the EPBC Act should consider the limitations noted below and whether additional information is required to determine the existence and location of MNES and other protected matters.

Where data are available to inform the mapping of protected species, the presence type (e.g. known, likely or may occur) that can be determined from the data is indicated in general terms. It is the responsibility of any person using or relying on the information in this report to ensure that it is suitable for the circumstances of any proposed use. The Commonwealth cannot accept responsibility for the consequences of any use of the report or any part thereof. To the maximum extent allowed under governing law, the Commonwealth will not be liable for any loss or damage that may be occasioned directly or indirectly through the use of, or reliance

3 DATA SOURCES

Threatened ecological communities

For threatened ecological communities where the distribution is well known, maps are generated based on information contained in recovery plans, State vegetation maps and remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species

Threatened, migratory and marine species distributions have been discerned through a variety of methods. Where distributions are well known and if time permits, distributions are inferred from either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc.) together with point locations and described habitat; or modelled (MAXENT or BIOCLIM habitat modelling) using

Where little information is available for a species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc.).

In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More detailed distribution mapping methods are used to update these distributions

4 LIMITATIONS

The following species and ecological communities have not been mapped and do not appear in this report:

- threatened species listed as extinct or considered vagrants;
- some recently listed species and ecological communities;
- some listed migratory and listed marine species, which are not listed as threatened species; and
- migratory species that are very widespread, vagrant, or only occur in Australia in small numbers.

The following groups have been mapped, but may not cover the complete distribution of the species:

- listed migratory and/or listed marine seabirds, which are not listed as threatened, have only been mapped for recorded
- seals which have only been mapped for breeding sites near the Australian continent

The breeding sites may be important for the protection of the Commonwealth Marine environment.

Refer to the metadata for the feature group (using the Resource Information link) for the currency of the information.

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [-Office of Environment and Heritage, New South Wales](#)
- [-Department of Environment and Primary Industries, Victoria](#)
- [-Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [-Department of Environment, Water and Natural Resources, South Australia](#)
- [-Department of Land and Resource Management, Northern Territory](#)
- [-Department of Environmental and Heritage Protection, Queensland](#)
- [-Department of Parks and Wildlife, Western Australia](#)
- [-Environment and Planning Directorate, ACT](#)
- [-Birdlife Australia](#)
- [-Australian Bird and Bat Banding Scheme](#)
- [-Australian National Wildlife Collection](#)
- [-Natural history museums of Australia](#)
- [-Museum Victoria](#)
- [-Australian Museum](#)
- [-South Australian Museum](#)
- [-Queensland Museum](#)
- [-Online Zoological Collections of Australian Museums](#)
- [-Queensland Herbarium](#)
- [-National Herbarium of NSW](#)
- [-Royal Botanic Gardens and National Herbarium of Victoria](#)
- [-Tasmanian Herbarium](#)
- [-State Herbarium of South Australia](#)
- [-Northern Territory Herbarium](#)
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- [-Australian National Herbarium, Canberra](#)
- [-University of New England](#)
- [-Ocean Biogeographic Information System](#)
- [-Australian Government, Department of Defence](#)
- [Forestry Corporation, NSW](#)
- [-Geoscience Australia](#)
- [-CSIRO](#)
- [-Australian Tropical Herbarium, Cairns](#)
- [-eBird Australia](#)
- [-Australian Government – Australian Antarctic Data Centre](#)
- [-Museum and Art Gallery of the Northern Territory](#)
- [-Australian Government National Environmental Science Program](#)
- [-Australian Institute of Marine Science](#)
- [-Reef Life Survey Australia](#)
- [-American Museum of Natural History](#)
- [-Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [-Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact us](#) page.

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Department of Climate Change, Energy, the Environment and Water

GPO Box 3090

Canberra ACT 2601 Australia

+61 2 6274 1111

Appendix D OIL SPILL PREPAREDNESS AND RESPONSE STRATEGY SELECTION AND EVALUATION

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Oil Spill Preparedness and Response Mitigation Assessment for the Scarborough 4D Baseline 1 (B1) Marine Seismic Survey (MSS)

Corporate HSE

Hydrocarbon Spill Preparedness

June 2023

Revision 0b

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EXECUTIVE SUMMARY

Woodside Energy Ltd (Woodside) has developed its oil spill preparedness and response position for the Scarborough 4D Baseline 1 (B1) Marine Seismic Survey (MSS), hereafter known as the Petroleum Activities Program (PAP).

This document demonstrates that the risks and impacts from an unplanned hydrocarbon release, and the associated response operations, are controlled to As Low as Reasonably Practicable (ALARP) and Acceptable levels. It achieves this by evaluating response options to address the potential environmental impacts resulting from an unplanned loss of hydrocarbon containment associated with the PAP described in the Environment Plan (EP). This document then outlines Woodside's decisions and techniques for responding to a hydrocarbon release event and the process for determining its level of hydrocarbon spill preparedness.

A summary of the key facts and references to additional detail within this document are presented below.

Table 0-1: Summary of the key details for assessment

Key details of assessment	Summary	Reference to additional detail				
Worst Case Credible Scenario	Credible Scenario-01 (CS-01): Hydrocarbon release caused by vessel collision Instantaneous surface release of 250 m ³ of marine diesel ¹	Section 2.2				
Hydrocarbon Properties	Under constant 5 kn wind conditions approximately 45% of the oil is predicted to evaporate within 24 hours. The majority of remaining oil on the water surface will weather at a slower rate due to being comprised of the longer-chain compounds with higher boiling points. Evaporation of the residual compounds will slow significantly, and they will then be subject to more gradual decay through biological and photochemical processes. Under variable wind conditions where winds are of a greater strength, more entrainment of oil into the water column is predicted (about 45% after 24 hours). A further 35% is forecast to evaporate, leaving only a small proportion of the oil floating on the water surface (<1%). It is predicted only 12.5 m ³ of product would remain after weathering from the marine diesel scenario and there is no predicted shoreline contact or accumulation.	Section 6.7.1.1 of the EP Appendix A of the First Strike Plan				
Modelling Results	A quantitative, stochastic assessment has been undertaken for the credible worst case spill scenario to help assess the environmental risk of a hydrocarbon spill. A total of 100 replicate simulations were completed for the scenarios to test for trends and variations in the trajectory and weathering of the spilled oil, with an even number of replicates completed using samples of metocean data that commenced within each calendar quarter. The stochastic modelling did not predict the threshold concentrations required to trigger deterministic modelling. Deterministic modelling was therefore not undertaken and stochastic modelling has been used to scale the response. <table border="1" data-bbox="414 1528 1230 1738"> <tr> <td>Minimum time to shoreline contact (above 100 g/m²)</td> <td>No contact at threshold</td> </tr> <tr> <td>Largest volume ashore at any single Response Priority Area (RPA) (above 100 g/m²)</td> <td>No contact at threshold</td> </tr> </table>	Minimum time to shoreline contact (above 100 g/m ²)	No contact at threshold	Largest volume ashore at any single Response Priority Area (RPA) (above 100 g/m ²)	No contact at threshold	Section 2.3
Minimum time to shoreline contact (above 100 g/m ²)	No contact at threshold					
Largest volume ashore at any single Response Priority Area (RPA) (above 100 g/m ²)	No contact at threshold					

¹ Modelling for an MDO release caused by vessel collision 17 km south of the centre of the Scarborough B1 4D Marine Seismic Survey Operational Area, was undertaken in 2019 using NOPSEMA's contemporary modelling thresholds. Scarborough B1 4D Marine Seismic Survey credible spill scenario is expected to be the same size as the surrogate modelling (250 m³) and is the same hydrocarbon type (MDO). Given that spill parameters and geographic location fall within the envelope of the activity, the existing modelling is an appropriate surrogate and therefore additional modelling was not required.

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Key details of assessment	Summary		Reference to additional detail
	Largest total shoreline accumulation (above 100 g/m ²) all shorelines	No contact at threshold	
Net Environmental Benefit Analysis	Monitor and evaluate, source control via vessel SOPEP and oiled wildlife response, are all identified as potentially having a net environmental benefit (dependent on the actual spill scenario) and carried forward for further assessment.		Section 4
ALARP evaluation of selected response techniques	The evaluation of the selected response techniques shows the proposed controls reduced the risk to an ALARP and Acceptable level for the risk presented in Section 2 , without the implementation of considered additional, alternative or improved control measures.		Section 6

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1 INTRODUCTION

1.1 Overview

Woodside Energy Ltd (Woodside) has developed its oil spill preparedness and response position for the Scarborough 4D B1 MSS, hereafter known as the PAP. This document outlines Woodside's decisions and techniques for responding to a hydrocarbon loss of containment event and the process for determining its level of hydrocarbon spill preparedness.

1.2 Purpose

This document, together with the documents listed below, meet the requirements of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Environment Regulations) relating to hydrocarbon spill response arrangements.

- The Scarborough 4D B1 MSS Environment Plan (EP)
- Oil Pollution Emergency Arrangements (OPEA) (Australia)
- The Scarborough 4D B1 MSS Oil Pollution Emergency Plan (OPEP) including
 - First Strike Response Plan (FSP)
 - Relevant Operations Plans
 - Relevant Tactical Response Plans (TRPs)
 - Relevant Supporting Plans
 - Data Directory.

The purpose of this document is to demonstrate that the risks and impacts from an unplanned hydrocarbon release and the associated response operations are controlled to As Low as Reasonably Practicable (ALARP) and Acceptable levels.

1.3 Scope

This document demonstrates that the risks and impacts from an unplanned hydrocarbon release, and the associated response operations, are controlled to ALARP and Acceptable levels. It achieves this by evaluating response options to address the potential environmental risks and impacts resulting from an unplanned loss of hydrocarbon containment associated with the PAP described in the EP. This document then outlines Woodside's decisions and techniques for responding to a hydrocarbon release event and the process for determining its level of hydrocarbon spill preparedness. It should be read in conjunction with the documents listed in **Table 1-1**. The location of the PAP is shown in Figure 3-1 of the EP.

1.4 Oil spill response document overview

The documents outlined in **Table 1-1** and **Figure 1-1** are collectively used to manage the preparedness and response for a hydrocarbon release.

The Oil Pollution First Strike Response Plan (FSP) (Woodside ID: 1401752711) contains a pre-operational Net Environmental Benefit Analysis (NEBA) summary, outlining the selected response techniques for this PAP. Relevant Operational Plans to be initiated for associated response techniques are identified in the FSP and relevant forms to initiate a response are appended to the FSP.

The process to develop an Incident Action Plan (IAP) begins once the Oil Pollution FSP is underway. The IAP includes inputs from the Monitor and Evaluate (ME) operations and the operational NEBA (**Section 4**). Planning, coordination and resource management are initiated by the Incident Management Team (IMT). In some instances, technical specialists may be utilised to provide expert advice. The planning may also involve liaison officers from supporting government agencies.

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During each operational period, field reports are continually reviewed to evaluate the effectiveness of response operations. In addition, the operational NEBA is continually reviewed and updated to ensure the response techniques implemented continue to result in a net environmental benefit (**Section 4**).

The response will continue as described in **Section 5** until the response termination criteria have been met.

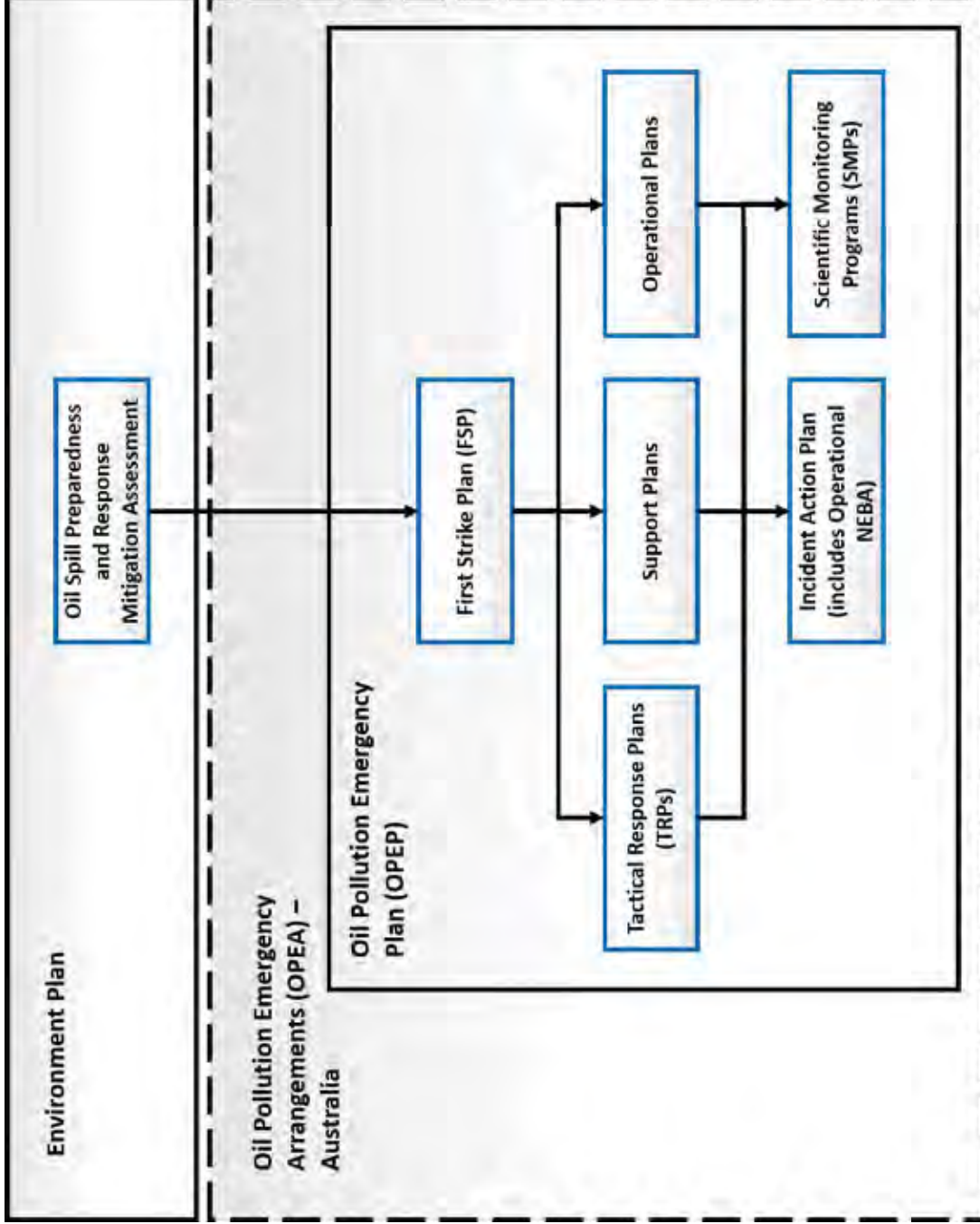


Figure 1-1: Woodside hydrocarbon spill document structure

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Table 1-1: Hydrocarbon spill preparedness and response – document references

Document	Document overview	Stakeholders	Relevant information	Document name/reference
Scarborough 4D B1 MSS EP	Demonstrates that potential adverse impacts on the environment associated with the Scarborough 4D B1 MSS (during both routine and non-routine operations) are mitigated and managed to ALARP and will be of an acceptable level.	NOPSEMA Woodside internal	EP Section 6 (Identification and evaluation of environmental risks and impacts, including credible spill scenarios) EP Section 7 (Implementation strategy – including emergency preparedness and response) EP Section 7 (Reporting and compliance) EP Section 6 (Performance outcomes, standards and measurement criteria)	
Oil Pollution Emergency Arrangements (OPEA) Australia	Describes the arrangements and processes adopted by Woodside when responding to a hydrocarbon spill from a petroleum activity.	Regulatory agencies Woodside internal	All	
Oil Spill Preparedness and Response Mitigation Assessment for the Scarborough 4D B1 MSS (this document)	Evaluates response options to address the potential environmental impacts resulting from an unplanned loss of hydrocarbon containment associated with the PAP described in the EP.	Regulatory agencies Corporate Incident Management Team (CIMT): Control function in an ongoing spill response for activity-specific response information.	All Performance outcomes, standards and measurement criteria related to hydrocarbon spill preparedness and response are included in this document.	
Scarborough 4D B1 MSS Oil Pollution First Strike Response Plan	Facility specific document providing details and tasks required to mobilise a first strike response. Primarily applied to the first 24 hours of a response until a full IAP specific to the event is developed. Oil Pollution First Strike Response Plans are intended to be the first document used to provide immediate guidance to the	Site-based IMT for initial response, activation and notification. CIMT for initial response, activation and notification. CIMT: Control function in an ongoing spill response for activity-specific response information.	Initial notifications and reporting required within the first 24 hours of a spill event. Relevant spill response options that could be initiated for mobilisation in the event of a spill. Recommended pre-planned tactics. Details and forms for use in immediate response. Activation process for oil spill	

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Document		Document overview	Stakeholders	Relevant information	Document name/reference
Operational Plans	<p>responding Incident Management Team (IMT).</p> <p>Lists the actions required to activate, mobilise and deploy personnel and resources to commence response operations.</p> <p>Includes details on access to equipment and personnel (available immediately) and steps to mobilise additional resources depending on the nature and scale of a release.</p> <p>Relevant operational plans will be initially selected based on the Oil Pollution First Strike Plan; additional operational plans will be activated depending on the nature and scale of the release.</p>	<p>CIMT: Operations and Logistics functions for first strike activities.</p> <p>CIMT: Planning Function to help inform the IAP on resources available.</p>	<p>trajectory modelling, aerial surveillance and oil spill tracking buoy details.</p> <p>Locations from where resources may be mobilised.</p> <p>How resources will be mobilised.</p> <p>Details of where resources may be mobilised to and what facilities are required once the resources arrive.</p> <p>Details on how to implement resources to undertake a response.</p>	<p>Operational Monitoring Plan</p> <p>Vessel Shipboard Oil Pollution Emergency Plan (SOPEP)</p> <p>Oiled Wildlife</p>	
Tactical Response Plans	<p>Provides options for response techniques in selected RPAs.</p> <p>Provides site, access and deployment information to support a response at the location.</p>	<p>CIMT: Planning Function to help develop IAPs, and Logistics Function to assist with determining resources required.</p>	<p>Indicative response techniques.</p> <p>Access requirements and/or permissions.</p> <p>Relevant information for undertaking a response at that site.</p> <p>Where applicable, may include equipment deployment locations and site layouts.</p>	<p>For full list of relevant Tactical Plans for the Scarborough 4D B1 MSS oil spill response, refer to ANNEX E: Tactical Response Plans.</p>	
Support Plans	<p>Support Plans detail Woodside's approach to resourcing and the provision of services during a hydrocarbon spill response.</p>	<p>CIMT: Operations, Logistics and Planning functions.</p>	<p>Technique for mobilising and managing additional resources outside of Woodside's immediate preparedness arrangements.</p>	<p>Marine</p> <p>Logistics</p> <p>People & Global Capability Surge</p> <p>Labour Requirement Plan</p> <p>Health & Safety</p> <p>Aviation</p> <p>IT Response Plan</p> <p>Communications Response Plan</p> <p>Stakeholder Engagement</p>	

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Document	Document overview	Stakeholders	Relevant information	Document name/reference
				Accommodation & Catering Waste Management Guidance for Oil Spill Claims Management Security Support Plan Hydrocarbon Spill Responder Health Monitoring Guideline

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2 RESPONSE PLANNING PROCESS

This document details Woodside's process for identifying potential response options for the hydrocarbon release scenarios, identified in the EP. **Figure 2-1** outlines the interaction between Woodside's response, planning/preparedness and selection process.

This structure has been used because it shows how the planning and preparedness activities inform a response and provides indicative guidance on what activities would be undertaken, in sequential order, if a real event were to occur. The process also evaluates alternative, additional and/or improved control measures specific to the PAP.

The Scarborough 4D B1 MSS First Strike Response Plan then summarises the outcome of the response planning process and provides initial response guidance and a summary of ongoing response activities, if an incident were to occur.

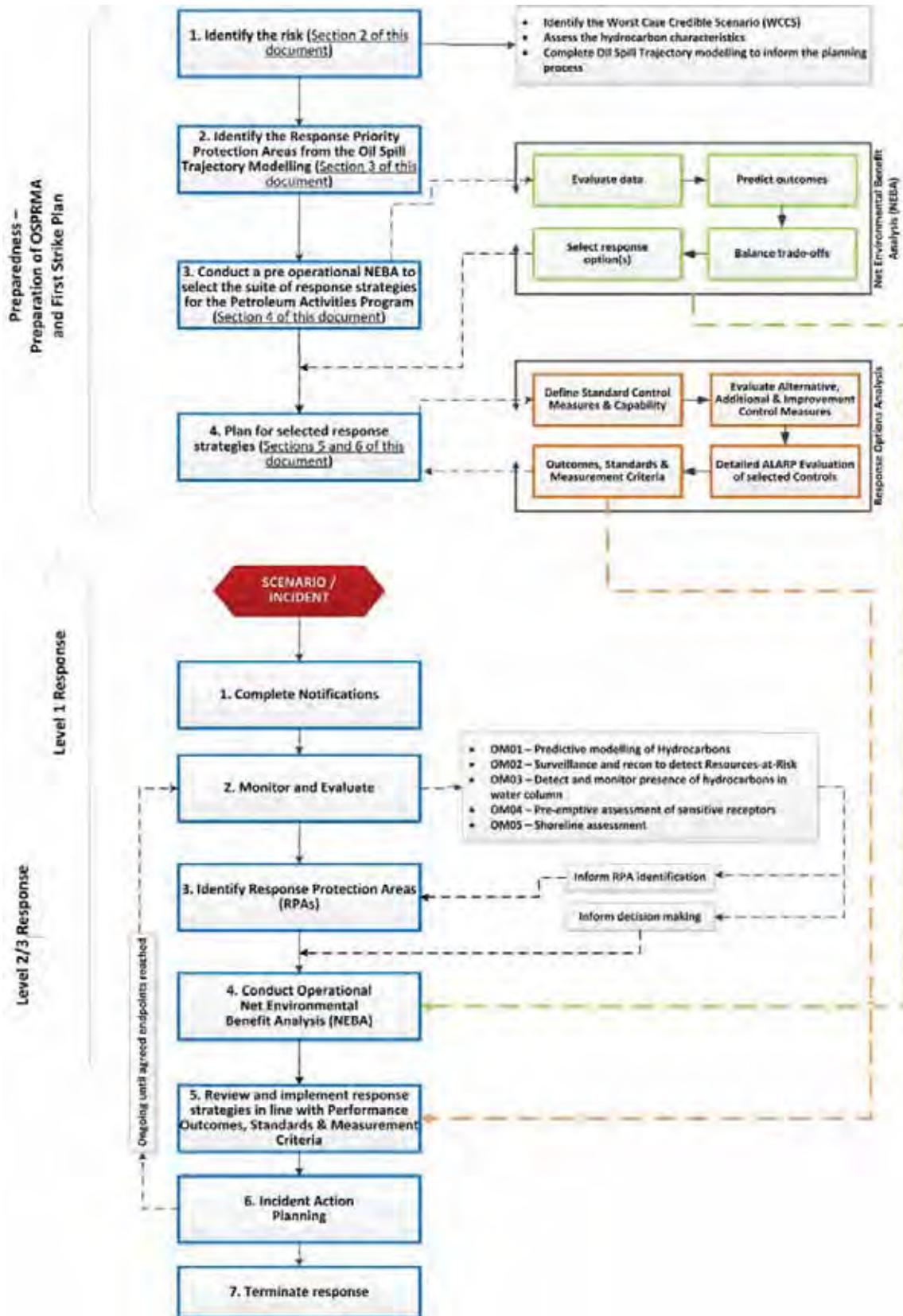


Figure 2-1: Response planning and selection process

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2.1 Response planning process outline

This document is expanded below to provide additional context on the key steps in determining capability, evaluating ALARP and hydrocarbon spill response requirements.

- Section 1. INTRODUCTION
- Section 2. RESPONSE PLANNING PROCESS
 - identification of worst-case credible scenario(s) (WCCS)
 - spill modelling for WCCS.
- Section 3. IDENTIFY RESPONSE PROTECTION AREAS (RPAs)
 - areas predicted to be contacted at concentration >100g/m².
- Section 4. NET ENVIRONMENTAL BENEFIT ANALYSIS (NEBA)
 - pre-operational NEBA (during planning/ALARP evaluation): this must be reviewed during the initial response to an incident to ensure its accuracy
 - selected response techniques prioritised and carried forward for ALARP assessment.
- Section 5. HYDROCARBON SPILL ALARP PROCESS
 - determines the response need based on predicted consequence parameters.
 - details the environmental performance of the selected response options based on need.
 - sets the environmental performance outcomes, environmental performance standards and measurement criteria.
- Section 6. ALARP EVALUATION
 - evaluates alternative, additional, and improved options for each response technique to demonstrate the risk has been reduced to ALARP.
 - provides a detailed ALARP assessment of selected control measure options against:
 - predicted cost associated with implementing the option
 - predicted change to environmental benefit
 - predicted effectiveness / feasibility of the control measure.
- Section 7. ENVIRONMENTAL RISK ASSESSMENT OF SELECTED RESPONSE TECHNIQUES
 - evaluation of impacts and risks from implementing selected response options.
- Section 8. ALARP CONCLUSION
- Section 9. ACCEPTABILITY CONCLUSION

2.1.1 Response Planning Assumptions

For the purpose of defining terms related to response planning and timing, the following definitions have been developed.



Figure 2-2: Response Planning Assumption - Timing, Resourcing and Effectiveness

2.2 Environment plan risk assessment (credible spill scenarios)

Potential hydrocarbon release scenarios from the PAP have been identified during the risk assessment process (Section 6 of the EP). Further descriptions of risk, impacts and mitigation measures (which are not related to hydrocarbon preparedness and response) are provided in Section 6 of the EP. Three unplanned events or credible spill scenarios for the PAP have been selected as representative across types, sources and incident/response levels, up to and including the WCCS.

Table 2-1 presents the credible scenarios for the PAP. The WCCS for the activity is then used for response planning purposes, as all other scenarios are of a lesser scale and extent. By demonstrating capability to manage the response to the WCCS, Woodside assumes other scenarios that are smaller in nature and scale can also be managed by the same capability. Response performance measures have been defined based on a response to the WCCS.

The surface release of marine diesel caused by vessel collision (Credible Scenario-01; CS-01) has been modelled and considered for response planning purposes. Credible Scenario-03 (CS-03) has significantly smaller marine diesel release volumes and is considered to be within the risk profile and spill response capability requirements of CS-01.

CS-01 is therefore selected for response planning purposes.

Table 2-1: Petroleum Activities Program credible spill scenarios

Credible Spill Scenarios	Scenario selected for planning purposes	Scenario description	Maximum credible volume released (liquid m ³) ¹	Incident Level	Hydrocarbon (HC) type	Residual proportion	Residual volume (liquid m ³)
Credible Scenario-01 (Worst Case)	Yes	Hydrocarbon release due to vessel collision	Instantaneous release of 250 m ³ marine diesel ^{2 3}	2	Marine diesel	5%	12.5 m ³
Credible Scenario-03	No	Marine Fuel Loss during bunkering	Instantaneous release of 8 m ³ marine diesel	1	Marine diesel	5%	0.4 m ³

³ Modelling for an MDO release caused by vessel collision 17 km south of the centre of the Scarborough B1 4D Marine Seismic Survey Operational Area, was undertaken in 2019 using NOPSEMA's contemporary modelling thresholds. Scarborough B1 4D Marine Seismic Survey credible spill scenario is expected to be the same size as the surrogate modelling (250 m³) and is the same hydrocarbon type (MDO). Given that spill parameters and geographic location fall within the envelope of the activity, the existing modelling is an appropriate surrogate and therefore additional modelling was not required.

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2.2.1 Hydrocarbon characteristics

Hydrocarbon characteristics, including modelled weathering data and ecotoxicity, are included in Section 6 of the EP.

Marine Diesel

Marine Diesel Oil is typically classed as an International Tanker Owners Federation (ITOPF) Group I/II oil.

Marine diesel is a mixture of volatile and persistent hydrocarbons with low proportions of highly volatile and residual components. Under constant 5 kn wind conditions, approximately 45% of the oil is predicted to evaporate within 24 hours. Under these calm conditions the majority of the remaining oil on the water surface will weather at a slower rate due to being comprised of the longer-chain compounds with higher boiling points. Evaporation of the residual compounds will slow significantly, and they will then be subject to more gradual decay through biological and photochemical processes. Under variable wind conditions where winds are of a greater strength, more entrainment of oil into the water column is predicted (about 45% after 24 hours). A further 35% is forecast to evaporate, leaving only a small proportion of the oil floating on the water surface (<1%).

The heavier (low volatility) components of the oil have a tendency to entrain into the upper water column due to wind-generated waves but can subsequently resurface if wind-waves abate. Therefore, the heavier components of this oil can remain entrained or on the sea surface for an extended period, with associated potential for dissolution of the soluble aromatic fraction. It is predicted only 12.5 m³ of product would remain after weathering from the marine diesel scenario and there is no predicted shoreline contact or accumulation.

2.3 Hydrocarbon spill modelling

Oil spill trajectory modelling tools are used for environmental impact assessment and during response planning to understand spatial scale and timeframes for response operations. Woodside recognises that there is a degree of uncertainty related to the use of modelling data and has subsequently utilised conservative approaches to volumes, weathering, spatial areas, timing and response effectiveness to scale capability to need.

The Oil Spill Model and Response System (OILMAP) and Integrated Oil Spill Impact Model System (SIMAP) models are used for stochastic modelling. They have been developed over three decades of planning, exercises, actual responses, several peer reviews, and validation studies. OILMAP was originally derived from the United States Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Type A model (French et al. 1996), for assessing marine transport, biological impact and economic impact that was also used under the United States Oil Pollution Act 1990 Natural Resource Damage Assessment (NRDA) regulations. Notable spills where the model has been used and validated against actual field observations include, Exxon Valdez (French McCay 2004), North Cape Oil Spill (French McCay 2003), along with an assessment of 20 other spills (French McCay and Rowe, 2004). In addition, test spills designed to verify fate, weathering and movement algorithms have been conducted regularly and in a range of climate conditions (French and Rines 1997; French et al. 1997; Payne et al. 2007s, 2007b; French McCay et al. 2007).

Further to this, the algorithms have been updated using the latest findings from the Macondo/Deepwater Horizon well blowout in the Gulf of Mexico and validated according to the Deepwater Horizon (DWH) oil spill in support of the Natural Resource Damage Assessment (NRDA) (Spaulding et al. 2015; French McCay et al. 2015, 2016). Finally, the OILMAP and SIMAP models have been used extensively in Australia to prosecute pollution offences, predict discharge locations and likely spill volumes based on weathering and surveillance observations, and has been used as expert witness evidence in Australian court proceedings, aiding the prosecution to determine spill quantum estimates.

2.3.1 Stochastic modelling

A quantitative, stochastic assessment has been undertaken for the credible spill scenario to help assess the environmental consequences of a hydrocarbon spill.

A total of 100 replicate simulations were completed for the scenario to test for trends and variations in the trajectory and weathering of the spilled oil over an annual period, with an even number of replicates completed using samples of metocean data that commenced within each month. Further details relating to the assessments for the scenario can be found in Section 6 of the EP.

2.3.1.1 Environmental impact thresholds – EMBA and hydrocarbon exposure

The outputs of the stochastic spill modelling are used to assess the potential environmental impact from the credible scenarios. The stochastic modelling results are used to delineate areas of the marine and shoreline environment that could be exposed to hydrocarbon levels exceeding environmental impact threshold concentrations. The summary of all the locations where hydrocarbon thresholds could be exceeded by any of the simulations modelled is defined as Environment that May Be Affected (EMBA) and is discussed further in Section 4 of the EP. As the weathering of different fates of hydrocarbons (surface, entrained and dissolved) differs due to the influence of the metocean mechanism of transportation, a different EMBA is presented for each fate within the EP.

A conservative approach – adopting accepted contact thresholds for impacts on the marine environment – is used to define the EMBA. These hydrocarbon thresholds are presented in **Table 2-2** below and described in Section 6 of the EP.

Table 2-2: Summary of thresholds applied to the stochastic hydrocarbon spill modelling of marine diesel to determine the EMBA and environmental impacts

Threshold (marine diesel)	Description
10 g / m ²	Surface hydrocarbon
100 ppb	Entrained hydrocarbon (ppb)
50 ppb	Dissolved aromatic hydrocarbon (ppb)
100 g / m ²	Shoreline accumulation

2.3.2 Deterministic Modelling

Deterministic modelling is undertaken where initial stochastic modelling has indicated that floating oil is present at an impact threshold of 50 g/m² and/or where there is shoreline accumulations at an impact threshold of 100 g/m². The deterministic modelling outputs are then used to scale the required capability for the offshore (containment and recovery and dispersant) and/or shoreline responses.

The selected stochastic modelling used as a representative of the WCCS for this PAP did not predict the threshold concentrations required to trigger the undertaking of deterministic modelling. Deterministic modelling was therefore not undertaken for CS-01 and stochastic modelling has been used to scale the response.

2.3.3 Response Planning Thresholds for Surface and Shoreline Hydrocarbon Exposure

Thresholds to determine the EMBA are used to predict and assess environmental impacts and inform the SMP, however they do not appropriately represent the thresholds at which an effective response can be implemented. Additional response thresholds are used for response planning and to determine areas where response techniques would be most effective. The spill modelling results are then used to assess the nature and scale of a response.

In the event of an actual response, existing modelling would be reviewed for suitability and additional modelling would be conducted using real-time data and field information to inform Incident Management Team decisions.

The spill modelling outputs are presented at response planning thresholds for surface hydrocarbons for the WCCS. Surface spill concentrations are expressed as grams per square metre (g/m²) (**Section 2.2**). The thresholds used are derived from oil spill response planning literature and industry guidance and are summarised below.

2.3.4 Surface Hydrocarbon Concentrations

Table 2-3: Surface hydrocarbon thresholds for response planning

Surface hydrocarbon concentration (g/m ²)	Description	Bonn Agreement Oil Appearance Code (BAOAC)	Mass per area (g/m ²)
>10	Predicted minimum threshold for commencing operational monitoring ⁴	Code 3 – Dull metallic colours	5 - 50

⁴ Operational monitoring will be undertaken from the outset of a spill whether or not this threshold has been reached. Monitoring is needed throughout the response to assess the nature of the spill, track its location and inform the need for any additional monitoring and/or response techniques. It also informs when the spill has entered State Waters and control of the incident passes to Western Australia Department of Transport (WA DoT).

Surface hydrocarbon concentration (g/m ²)	Description	Bonn Agreement Oil Appearance Code (BAOAC)	Mass per area (g/m ²)
50	Predicted minimum floating oil threshold for containment and recovery and surface dispersant application ⁵	Code 4 – Discontinuous true oil colour	50 - 200
100	Predicted optimum floating oil threshold for containment and recovery and surface dispersant application	Code 5 – Continuous true oil colour	>200
Shoreline hydrocarbon concentration (g/m ²)	Description	National Plan Guidance on Oil Contaminated Foreshores	Mass per area (g/m ²)
100	Predicted minimum shoreline accumulation threshold for shoreline assessment operations	Stain	>100
250	Predicted minimum threshold for commencing shoreline clean-up operations	Level 3 - Thin Coating	200 - 1000

The surface thickness of oil at which dispersants are typically effective is approximately 100 g/m². However, substantial variations occur in the thickness of the oil within the slick. Additionally, the recommended rate of application for surface dispersant is typically 1-part dispersant to 20 or 25 parts of spilled oil. These figures assume a 0.1 mm slick thickness, averaged over the thickest part of the spill, to calculate a litres/hectare application rate from vessels and aircraft. In practice, this can be difficult to achieve as it is not possible to accurately assess the thickness of the floating oil.

Some degree of localised over-dosage and under-dosage is inevitable in dispersant response. An average oil layer thickness of 0.1 mm is often assumed, although the actual thickness can vary over a wide range (from less than 0.0001 mm to more than 1 mm) over short distances (International Petroleum Industry Environment Conservation Association [IPIECA] 2015).

Guidance from AMSA (AMSA, 2015) indicates that spreading of spills of Group II or III products will rapidly decrease slick thickness over the first 24 hours of a spill resulting in the potential requirement of up to a ten (10) fold increase in capability on day 2 to achieve the same level of performance.

Further guidance from the European Maritime Safety Authority (EMSA) states that spraying the 'metallic' looking area of an oil slick (Bonn Agreement Oil Appearance Code [BAOAC] 3, approx. 5 – 50 µm) with dispersant from spraying gear designed to treat an oil layer 0.1 mm (100 µm) thick, will inevitably cause dispersant over-treatment by a factor of 2 to 20 times (EMSA 2012).

Therefore, dispersant application should be concentrated on the thickest areas of an oil slick and Woodside intends on applying surface dispersants to only BAOAC 4 and 5. Spraying areas of oil designated as BAOAC Code 4 (Discontinuous true oil colour) with dispersant will, on average, deliver approximately the recommended treatment rate of dispersant.

Spraying areas of oil designated as BAOAC Code 5 with dispersant (Continuous true oil colour and more than 0.2 mm thick) will, on average, deliver approximately half the recommended treatment rate of dispersant. Repeated application of these areas of thicker oil, or increased dosage ratios, will be required to achieve the recommended treatment rate of dispersant (EMSA 2012).

Guidance from the National Oceanic and Atmospheric Administration (NOAA) in the United States is found in the document: *Characteristics of Response Techniques: A Guide for Spill Response Planning in Marine Environments 2013* (NOAA 2013). This guide outlines advice for response

⁵ At 50g/m², containment and recovery and surface dispersant application operations are not expected to be particularly effective. This threshold represents a conservative approach to planning response capability and containing the spread of surface oil.

planning across all common techniques, including surface dispersant spraying and containment and recovery. It states that oil thickness can vary by orders of magnitude within distinct areas of a slick, thus the actual slick thickness and oil distribution of target areas are crucial for determining response method feasibility. Further to this, ITOPF also states that in terms of oil spill response, sheen can be disregarded as it represents a negligible quantity of oil, cannot be recovered or otherwise dealt with to a significant degree by existing response techniques, and is likely to dissipate readily and naturally (ITOPF, 2014).

Figure 2-3 below from AMSA's Identification of Oil on Water – Aerial Observation and Identification Guide (AMSA, 2014) shows expected percent coverage of surface hydrocarbons as a proportion of total surface area. Wind-rows, heavy oil patches and tar balls, for example, must be considered, as they influence oil encounter rates, chemical dosages and ignition potential. Each method has different thickness thresholds for effective response.

From this information and other relevant sources (Allen and Dale, 1996, EMSA, 2012, Spence, 2018) the surface threshold of $50\text{g}/\text{m}^2$ was chosen as an average / equilibrium thickness ($50\text{g}/\text{m}^2$ is an average is 50% coverage of 0.1mm Bonn Agreement Code 4 - discontinuous true oil colour, or 25% coverage of 0.2mm Bonn Agreement Code 5 – continuous true oil colour which would represent small patches of thick oil or wind-rows).

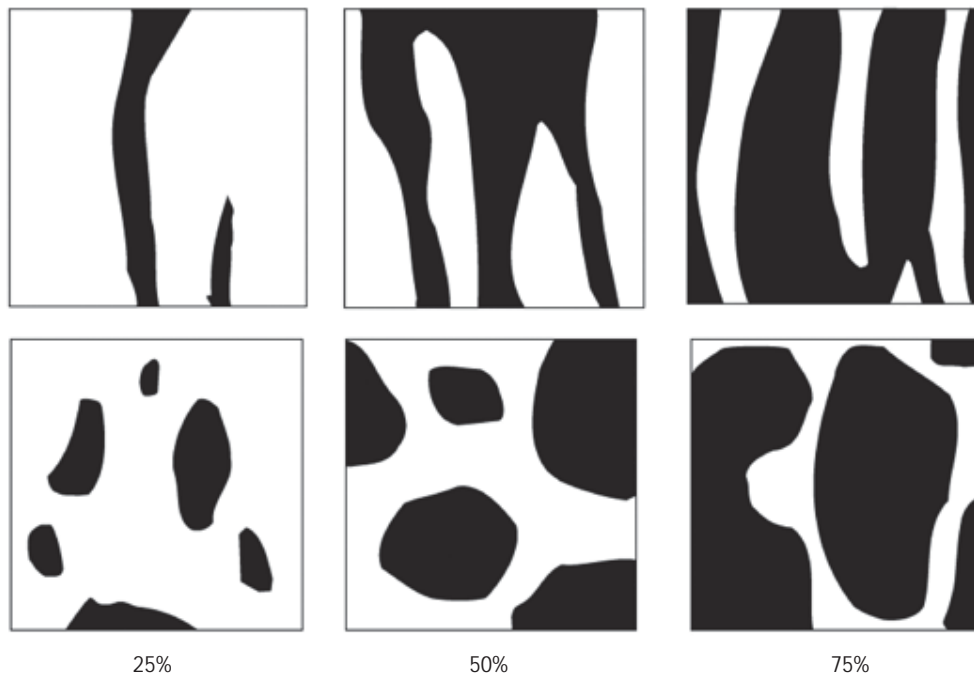


Figure 2-3: Proportion of total area coverage (AMSA, 2014)

Figure 2-4 illustrates the general relationships between on-water response techniques and slick thickness. Wind-rows, heavy oil patches and tar balls, for example, must be considered, as they influence oil encounter rates, chemical dosages and ignition potential. Each method has different thickness thresholds for effective response.

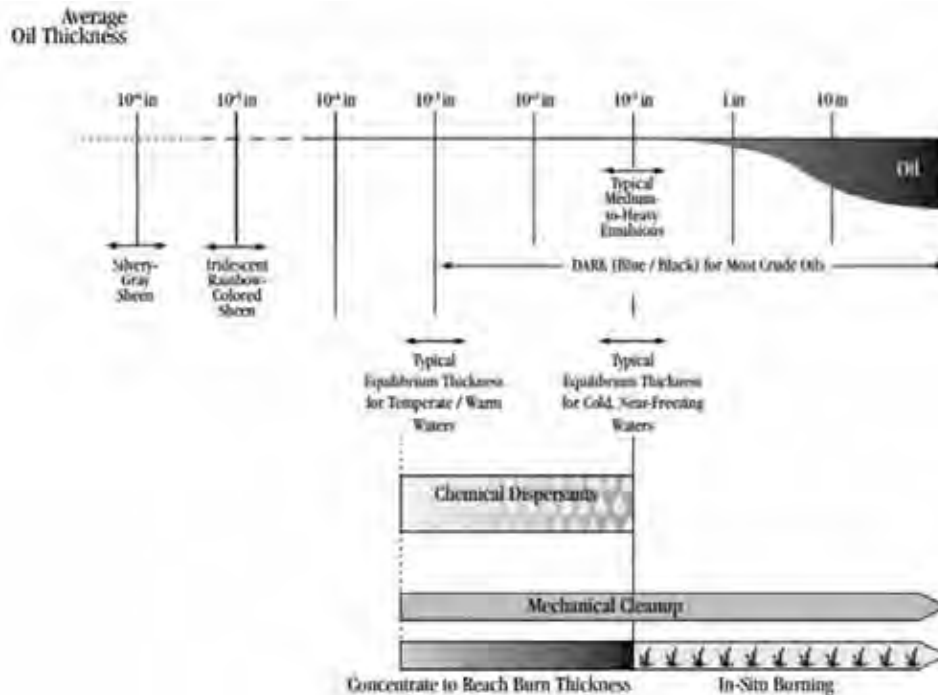


Figure 2-4: Oil thickness versus potential response options (from Allen and Dale 1996)

Wind and waves influence the feasibility of mechanical clean-up operations, dropping the effectiveness significantly because of entrainment and/or splash-over as short period waves develop beyond two to three feet (0.6–0.9m) in height. Waves and wind can also be limiting factors for the safe operation of vessels and aircraft. There is also potential secondary contamination of unimpacted areas and waste issues associated with mechanical dispersion of slicks (**Table 4-2 and Section 4.2.3.3**).

2.3.5 Surface Hydrocarbon Viscosity

Table 2-4: Surface hydrocarbon viscosity thresholds

Surface viscosity (cSt)	Description	European Maritime Safety Authority (EMSA)	Viscosity at sea temperature (cSt)
5,000	Predicted optimum viscosity for surface dispersant operations	Generally possible to disperse	500-5000
10,000	Predicted maximum viscosity for effective surface dispersant operations	Sometimes possible to disperse	5,000-10,000

Further to the required thickness for surface dispersant application and containment and recovery to be deployed effectively as outlined above, changes to viscosity will also limit the treatment of offshore response techniques. As outlined in the EMSA Manual on the Applicability of Oil Spill Dispersants (EMSA, 2012), guidance around changes to viscosity and likely effectiveness of surface dispersant application is provided.

This includes the following statements: “It has been known for many years that it is more difficult to disperse a high viscosity oil than a low or medium viscosity oil. Laboratory testing had shown that the effectiveness of dispersants is related to oil viscosity, being highest for modern “Concentrate, UK Type 2/3” dispersants at an oil viscosity of about 1,000 or 2,000 mPa.s (1,000 – 2,000 cSt) and then declining to a low level with an oil viscosity of 10,000 mPa.s (10,000 cSt). It was considered that some generally applicable viscosity limit, such as 2,000 or 5,000 mPa.s (2,000 – 5,000 cSt), could be applied to all oils.”

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However, modern oil spill dispersants are generally effective up to an oil viscosity of 5,000 mPa.s (5,000 cSt) or more, and their performance gradually decreases with increasing viscosity; oils with a viscosity of more than 10,000 are, in most cases, no longer dispersible. Guidance from CEDRE (EMSA, 2012) also indicates that products with a range of 500 – 5,000 cSt at sea temperature are generally possible to disperse, while 5,000 – 10,000 cSt at sea temperature above pour point are sometimes possible to disperse, with products beyond 10,000 cSt at sea temperature below pour point are generally impossible to disperse. The potential use of dispersants is evaluated in **Table 4-2**.

To support decision making and response planning, a threshold of 10,000 cSt at sea temperature was chosen as a conservative estimate of maximum viscosity for surface dispersant spraying operations.

The thresholds described above are compared with the modelling results for the WCCS (**Table 2-5**).

2.3.6 Spill modelling results

Details of the scenario and modelling inputs are included along with results in **Table 2-5**.

The selected results used to represent the WCCS are based on response thresholds:

- Minimum time to commencement of hydrocarbon accumulation at any shoreline receptor (at a threshold of 100 g/m²).
- Minimum time to floating hydrocarbon contact with the offshore edge(s) of any shoreline receptor polygon (at a threshold of 10 g/m²).
- Maximum cumulative hydrocarbon volume accumulated at any individual shoreline receptor.
- Maximum cumulative hydrocarbon volume accumulated across all shoreline receptors contacted by accumulated hydrocarbons (including those contacted at <100 g/m² accumulation concentration).
- Minimum time to entrained/dissolved hydrocarbon contact with the offshore edges of any receptor polygon (at a threshold of 100 ppb/50 ppb).

The volumes as presented in **Table 2-5** are the worst case volumes resulting from the selected stochastic modelling and have been used to determine appropriate level of response.

Table 2-5: Worst case credible scenario modelling results

Response parameter	Modelled result
	Marine diesel release caused by vessel collision
Maximum instantaneous liquid hydrocarbon release rate and duration	Modelled instantaneous surface release of 250 m ³ marine diesel ⁶
Maximum residual surface hydrocarbon after weathering	12.5 m ³
Modelling results	
Minimum time to commencement of hydrocarbon accumulation at any shoreline receptor (at a threshold of 100 g/m ²)	No contact at threshold
Minimum time to floating hydrocarbon contact with the offshore edge(s) of any shoreline receptor polygon (at a threshold of 10 g/m ²)	No contact at threshold
Maximum cumulative hydrocarbon volume accumulated at any individual shoreline receptor	No contact at threshold
Maximum cumulative hydrocarbon volume accumulated across all shoreline receptors contacted by accumulated hydrocarbons (including those contacted at <100 g/m ² accumulation concentration)	No contact at threshold
Minimum time to entrained/dissolved hydrocarbon contact with the offshore edges of any receptor polygon (at a threshold of 100 ppb/50 ppb)	55 hours at Gascoyne AMP

The stochastic modelling results for the WCCS have been used as the basis for response planning and are included in **Section 4.2**.

The stochastic modelling results for Credible Scenario-01 are summarized as follows:

- Surface hydrocarbon concentrations greater than 10 g/m² may occur up to 52 km from the release location.
- Floating oil at the 10 g/m² threshold is not predicted at any RPA for the duration of the spill.
- No shoreline receptors are predicted to be contacted by floating oil concentrations at any of the assessed thresholds.
- No accumulation of oil on shorelines is predicted.
- The Gascoyne AMP is predicted to receive entrained oil concentrations at the 100 ppb threshold with a probability of 4% after 55 hours.
- Spreading and weathering of the surface oil occurs rapidly due to the loss of light, volatile components and the spreading. Dispersant application and containment and recovery are not appropriate for use on spills of marine diesel due to these weathering characteristics.

⁶ Modelling for an MDO release caused by vessel collision 17 km south of the centre of the Scarborough B1 4D Marine Seismic Survey Operational Area, was undertaken in 2019 using NOPSEMA's contemporary modelling thresholds. Scarborough B1 4D Marine Seismic Survey credible spill scenario is expected to be the same size as the surrogate modelling (250 m³) and is the same hydrocarbon type (MDO). Given that spill parameters and geographic location fall within the envelope of the activity, the existing modelling is an appropriate surrogate and therefore additional modelling was not required.

3 IDENTIFY RESPONSE PROTECTION AREAS (RPAs)

In a response, operational monitoring programs – including trajectory modelling and vessel/aerial observations – would be used to predict RPAs that may be impacted. For the purposes of planning and appropriately scaling a response, modelling has been used to identify RPAs as outlined below in Figure 3-1.

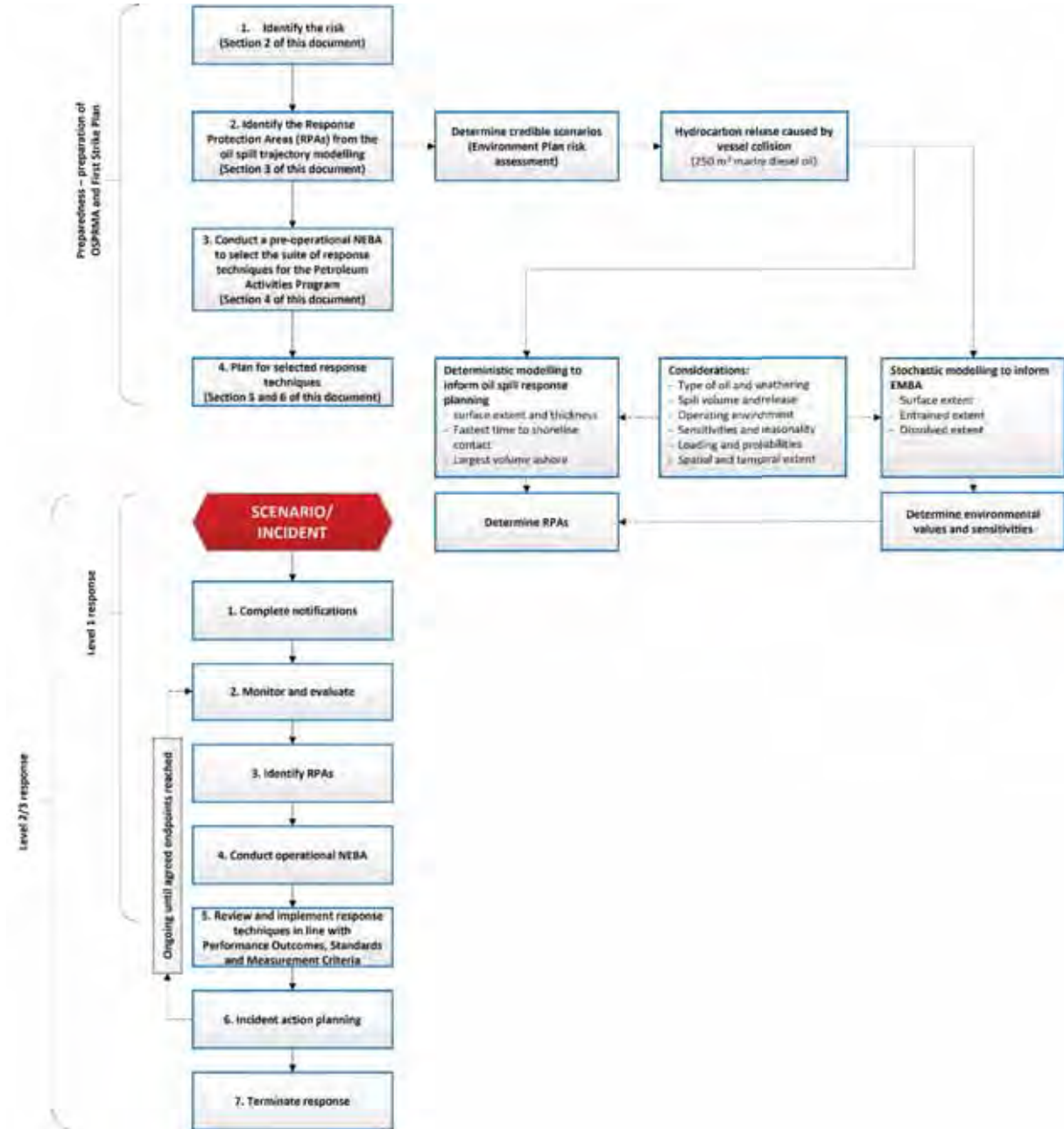


Figure 3-1: Identify Response Protection Areas (RPAs) flowchart

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3.1 Identified sensitive receptor locations

Section 6 of the EP includes the list of sensitive receptor locations that have been identified by stochastic modelling as meeting the requirements outlined below:

- receptors with the potential to incur surface, entrained or shoreline accumulation contact above environmental impact thresholds
- receptors within the EMBA which meet the following:
 - a number of priority protection criteria/categories
 - International Union of Conservation of Nature IUCN marine protected area categories
 - high conservation value habitat and species
 - important socio-economic/heritage value.

3.2 Identify Response Protection Areas (RPAs)

From the identified sensitive receptors described in Section 6 of the EP, only those which a shoreline response could feasibly be conducted (accumulation > 100g/m² for shoreline assessment and/or contact with surface slicks >10 g/m² for operational monitoring⁷) have been selected for response planning purposes.

3.2.1 Response Protection Areas (RPAs)

RPAs are selected on the basis of their environmental ecological, social, economic, cultural and heritage values and sensitivities and the ability to conduct a response based on the minimum response thresholds (**Section 2.3.3**). The Gascoyne AMP is predicted to receive entrained oil concentrations at the 100 ppb threshold with a probability of 4% after 55 hours. The maximum entrained oil concentration is forecast as 998 ppb within the Gascoyne AMP.

No shoreline receptors are predicted to be contacted by floating oil concentrations at any of the assessed thresholds. Additionally, modelling shows there is no accumulation of oil on shorelines is predicted.

During a spill event, operational monitoring techniques (OM01, OM02, OM03, OM04 and OM05) would be deployed from the outset of the spill to track the spill trajectory and deduce if any RPAs are at risk of impact. TRPs will be drafted in advance for any RPAs with a contact time of <14 days.

Any additional sensitive receptors are presented in the existing environment description (Section 4 of the EP) and impact assessment section (Section 6 of the EP) for the spill scenario. The pre-operational NEBA (**Section 4**) considers the results from the stochastic modelling to ensure all feasible response techniques are considered in the planning phase, therefore additional receptors are also included in the pre-operational NEBA.

⁷ Operational monitoring will be undertaken from the outset of a spill whether or not this threshold has been reached. Monitoring is needed throughout the response to assess the nature of the spill, track its location and inform the need for any additional monitoring and/or response techniques. It also informs when the spill has entered State Waters and/or control of the incident passes to statutory authorities e.g. WA DoT or AMSA.

4 NET ENVIRONMENTAL BENEFIT ANALYSIS (NEBA)

A Net Environmental Benefit Analysis (NEBA) is a structured process to consider which response techniques are likely to provide the greatest net environmental benefit.

The NEBA process typically involves four key steps outlined in **Figure 4-1**: evaluate data, predict outcomes, balance trade-offs, and select response options. These steps are followed in the planning/preparedness process and would also be followed in a response.

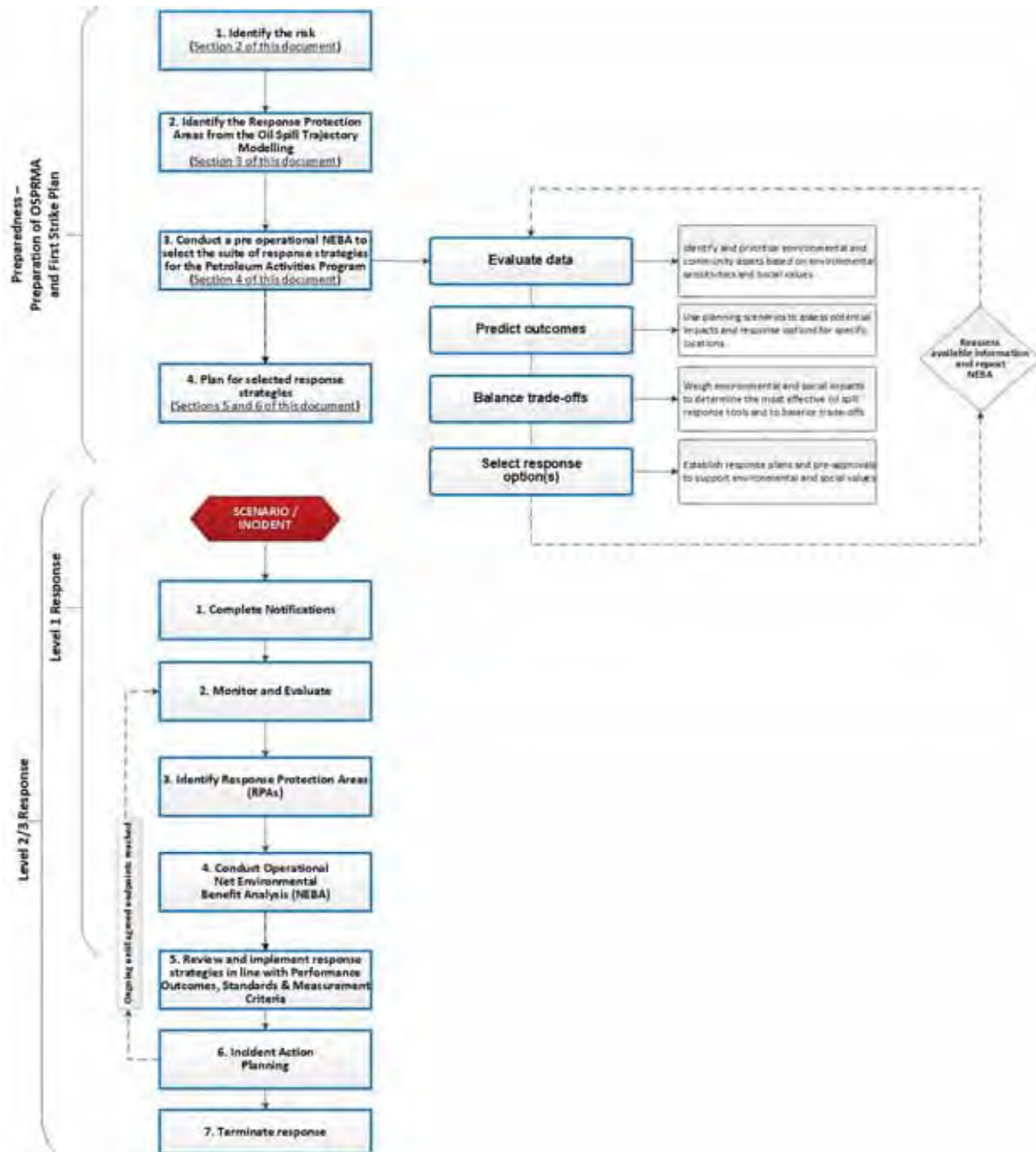


Figure 4-1: Net Environmental Benefit Analysis (NEBA) flowchart

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4.1 Pre-operational / Strategic NEBA

The pre-operational NEBA identifies positive and negative impacts to sensitive receptors from implementing the response techniques. Feasibility is considered by assessing the receptors potentially impacted above response thresholds (**Section 2.3.1.1**) and the surface concentrations from the modelling.

Completing a pre-operational NEBA is a key response planning control that reduces the environmental risks and impacts of implementing the selected response techniques. Comprehensive details of the pre-operational NEBA for this PAP are contained in **ANNEX A: Net Environmental Benefit Analysis** detailed outcomes.

4.2 Stage 1: Evaluate data

Woodside identifies and prioritises environmental and community assets based on environmental sensitivities and social values, informed through the use of trajectory modelling. Interpretation of stochastic oil spill modelling determines the EMBA for the release, which defines the spatial area that may be potentially impacted by the PAP activities.

4.2.1 Define the scenario(s)

Woodside uses scenarios identified from the risk assessment in the EP to assess potential impacts and response options for specific locations. Modelling of the WCCS is then used for this pre-operational NEBA. Outlier locations with potential environmental impacts, selected from the stochastic modelling may also be included for assessment. Response thresholds and modelling results are then used to assess the feasibility/effectiveness and scale of the response.

Table 4-1: Scenario summary information (WCCS)

Scenario summary information (WCCS– Credible scenario-01)	
Scenario	Hydrocarbon release caused by marine vessel collision
Location	Lat: 19° 46' 01.00"S Long: 113° 15' 00.00" E
Oil Type	Marine diesel
Volume and duration of release	Instantaneous release of 250 m ³ ⁸

4.2.1.1 Hydrocarbon characteristics

Marine Diesel

Marine Diesel is typically classed as an International Tanker Owners Pollution Federation (ITOPF) Group I/II oil.

Marine diesel is a mixture of volatile and persistent hydrocarbons with low proportions of highly volatile and residual components. Under constant 5 kn wind conditions, about 6% of the oil mass is predicted to evaporate within the first 12 hours (BP < 180 °C); a further 35% should evaporate within the first 24 hours (180 °C < BP < 265 °C); and a further 54% should evaporate over several days (265 °C < BP < 380 °C). Approximately 5% of the oil is shown to be persistent. The aromatic content of the oil is approximately 3%. Under variable wind conditions where winds are of a greater strength, more entrainment of oil into the water column is predicted (about 45% after 24 hours). A further 35% is forecast to evaporate, leaving only a small proportion of the oil floating on the water surface (<1%).

⁸ Modelling for an MDO release caused by vessel collision 17 km south of the centre of the Scarborough B1 4D Marine Seismic Survey Operational Area, was undertaken in 2019 using NOPSEMA's contemporary modelling thresholds. Scarborough B1 4D Marine Seismic Survey credible spill scenario is expected to be the same size as the surrogate modelling (250 m³) and is the same hydrocarbon type (MDO). Given that spill parameters and geographic location fall within the envelope of the activity, the existing modelling is an appropriate surrogate and therefore additional modelling was not required.

The heavier (low volatility) components of the oil have a tendency to entrain into the upper water column due to wind-generated waves but can subsequently resurface if wind-waves abate. Therefore, the heavier components of this oil can remain entrained or on the sea surface for an extended period, with associated potential for dissolution of the soluble aromatic fraction.

Stochastic modelling results for WCCS Credible Scenario-01	
Minimum time to shoreline contact (above 100 g/m ²)	No contact at threshold
Largest volume ashore at any single RPA (above 100 g/m ²)	No contact at threshold
Largest total shoreline accumulation (above 100 g/m ²)	No contact at threshold

4.2.2 Determining potential response options

The available response techniques based on current technology can be summarised under the following headings:

- Monitor and evaluate (including operational monitoring)
- Source control
 - vessel source control
 - remotely operated vehicle (ROV) intervention
 - debris clearance and/or removal
 - capping stack
 - containment dome
 - relief well drilling
- Surface dispersant application:
 - aerial dispersant application
 - vessel dispersant application
- Containment and recovery
- Mechanical dispersion
- In-situ burning
- Shoreline protection and deflection
- Shoreline clean-up:
 - Phase 1 – Mechanical clean-up
 - Phase 2 – Manual clean-up
 - Phase 3 – Final polishing
- Oiled wildlife response (including hazing)
- Waste management
- Post spill monitoring/scientific monitoring

An assessment of which response options are feasible for the scenarios is included below in **Table 4-2**. These options are evaluated against each scenario's parameters including oil type, volume and characteristics, prevailing weather conditions, logistical support, and resource availability to determine their deployment feasibility.

A shortlist of the feasible response options is then carried forward for the ALARP assessment with a justification for the exclusion of other response techniques included in **Section 4.2.3**. This assessment will typically result in a range of available options, that are deployed at different areas (at-source, offshore, nearshore and onshore) and times through the response. The NEBA process assists in prioritising which options to use where and when and timings throughout the response.

Table 4-2: Response technique evaluation – Surface Release

Response Technique		Effectiveness	Feasibility	Decision	Rationale for the decision
Hydrocarbon: Marine Diesel					
	Will be effective in tracking the location of the spill, predicting potential impacts and triggering further monitoring and response techniques as required. Monitoring techniques include:		Monitoring of a Marine Diesel spill is a feasible response technique and outputs will be used to guide decision making on the use of other monitoring/response techniques and providing information to regulatory agencies including AMSA and WA DoT.	Yes	Monitoring the spill will be necessary to: <ul style="list-style-type: none"> • Validate trajectory and weathering models • Determine the behaviour of the oil in water • Determine the location and weathering condition of the slick • Provide forecasts of spill trajectory • Determine appropriate response techniques • Determine effectiveness of response techniques • Confirm impact pathways to receptors
Monitor and Evaluate	<ul style="list-style-type: none"> • OM01 Predictive modelling of hydrocarbons – used throughout spill. 'Ground-truthed' using the outputs of all other monitoring techniques. • OM02 Surveillance and reconnaissance to detect hydrocarbons and resources at risk – from outset of spill. • OM03 Monitoring of hydrocarbon presence, properties, behaviour and weathering in water – from outset of spill. • OM04 Pre-emptive assessment of sensitive receptors at risk – triggered once OM01, OM02 and OM03 inform likely RPAs at risk. • OM05 Shoreline assessment – once OM02, OM03 and OM04 inform which RPAs have been impacted. 	Controlling the spill of diesel at source would be the most effective way to limit the quantity of hydrocarbon entering the marine environment.	A spill of diesel from a vessel collision will be instantaneous and source control will be limited to what the vessel can achieve whilst responding to the incident.	Yes	Ability to stop the spill at source will be dependent upon the specific spill circumstances and whether or not it is safe for response personnel to access/isolate the source of the spill.
Source Control (vessel)	Dispersants are not considered effective when applied on thin surface films such as marine diesel as the dispersant droplets tend to pass through the surface films without binding to the hydrocarbon.		Marine diesel is prone to rapid spreading and evaporation thus the use of dispersant would be deemed an unnecessary response technique.	No	The application of dispersant to marine diesel is unnecessary as the diesel will rapidly evaporate and would thus unnecessarily introduce additional chemical substances to the marine environment. The additional entrainment would also increase exposure of subsea species and habitats to hydrocarbons.
Surface Dispersant Application	Containment and recovery has an effective recovery rate of 5-10% when a hydrocarbon encounter rate of 25-50% is achieved at BAOAC 4 and 5. Containment and recovery requires a spill to be BAOAC 4 or 5 with a 50-100% coverage of 100 g/m ² to 200 g/m ² .		Marine diesel is prone to rapid spreading and evaporation thus reducing the feasibility of containment and recovery as a response technique.	No	Containment and recovery would be an inappropriate response technique as the coverage requirements would not be achieved by a marine diesel spill. In addition, most of the spilled diesel would have been subject to rapid evaporation and entrainment prior to the commencement of containment and recovery operations.
Containment and Recovery	Mechanical dispersion involves the use of a vessel's prop wash and/or fire hose to target surface hydrocarbons to achieve dispersion into the water column. However, this technique is of limited benefit in an open ocean environment where wind and wave action are likely to deliver similar advantages.		Although the technique is feasible, highly volatile hydrocarbons are likely to weather, spread and evaporate quickly. The volatile nature of the oil is also likely to lead to unsafe conditions in the vicinity of fresh hydrocarbon. Additionally, any vessel used for mechanical dispersion activities would be contaminated by the hydrocarbon and could potentially cause secondary contamination of unimpacted areas when exiting the spill area. The decontamination of a vessel used for mechanical dispersion activities would result in additional quantities of oily waste requiring appropriate handling and treatment.	No	Given the limited benefit of mechanical dispersion over natural wind and wave action, secondary contamination and waste issues, and the associated safety risk of implementing the response for this activity, this strategy is deemed unsuitable.
Mechanical dispersion	In-situ burning is only effective where minimum slick thickness can be achieved.		Use of in-situ burning as a response technique for marine diesel is unfeasible as the minimum slick thickness cannot be attained due to rapid spreading. In addition, there is a limited window of opportunity in which this technique can be applied (prior to evaporation of the volatiles) which is unlikely to be achieved. Furthermore, entering a volatile environment to undertake this technique would be unsafe for response personnel.	No	Diesel characteristics are not appropriate for the use of in-situ burning as the minimum thickness will not be attained due to rapid spreading. Furthermore, it would unnecessarily cause an increase in the release of atmospheric pollutants.
In-situ Burning	Shoreline protection and deflection can be effective at preventing contamination of at-risk areas.		Use of shoreline protection and deflection for a spill of marine diesel is unlikely to provide any significant environmental benefit as the diesel will be subject to rapid spreading and evaporation prior to contact with any sensitive areas. The modelling undertaken predicts no shoreline receptors are to be contacted by floating oil concentrations at any of the assessed thresholds and no accumulation of oil on	No	The modelling undertaken predicts that no shorelines will be impacted thus it is unlikely that this technique would be required.
Shoreline Protection and Deflection					

Response Technique	Effectiveness	Feasibility	Decision	Rationale for the decision
Shoreline Clean up	Shoreline clean-up is an effective means of hydrocarbon removal from contaminated shorelines where coverage is at an optimum level of 250 g/m ² .	<p>shorelines, therefore shoreline protection and deflection does not require consideration.</p> <p>A marine diesel spill would be prone to rapid spreading and evaporation prior to impacting any sensitive receptors. Operational monitoring will, however, be deployed from the outset of a spill to track the spill location and fate in real-time.</p> <p>The modelling undertaken predicts no shoreline receptors are to be contacted by floating oil concentrations at any of the assessed thresholds and no accumulation of oil on shorelines, therefore shoreline protection and deflection does not require consideration.</p>	No	The modelling undertaken predicts that no shorelines will be impacted thus it is unlikely that this technique would be required.
Oiled Wildlife	Oiled wildlife response is an effective response technique for reducing the overall impact of a spill on wildlife. This is mostly achieved through hazing to prevent additional wildlife from being contaminated and through rehabilitation of those already subject to contamination.	<p>Due to the likely volatile atmospheric conditions surrounding a diesel spill, response options would be limited to hazing to ensure the safety of response personnel. In addition, any rehabilitation could only be undertaken by trained specialists.</p>	Potentially	The modelling undertaken predicts that no sensitive areas will be impacted thus it is unlikely that this technique would be required. However, in the event that wildlife are at risk of contamination, oiled wildlife response will be undertaken as and where required.

4.2.3 Exclusion of response techniques

Response techniques that are not feasible for the worst case scenario (Credible Scenario-01) for the Scarborough 4D B1 MSS are detailed in the subsections below and are excluded from further assessment within this document.

4.2.3.1 Surface Dispersant Application

Marine diesel is prone to rapid spreading and evaporation thus the use of dispersant would be deemed an unnecessary response technique. The application of dispersant to marine diesel is unnecessary as the diesel will rapidly evaporate and would thus unnecessarily introduce additional chemical substances to the marine environment. The additional entrainment would also increase exposure of subsea species and habitats to hydrocarbons.

4.2.3.2 Containment and Recovery

Marine diesel is prone to rapid spreading and evaporation thus reducing the feasibility of containment and recovery as a response technique. Furthermore, entering a volatile environment to undertake this technique would be unsafe for response personnel. Although this scenario results in surface oil of BAOAC 4, this only occurs within the first few hours during which time volatile levels would be very high and unsafe for response personnel.

4.2.3.3 Mechanical Dispersion

Mechanical dispersion involves the use of a vessel's prop wash and/or fire hose to target surface hydrocarbons to achieve dispersion into the water column. However, this technique is of limited benefit in an open ocean environment where wind and wave action are likely to deliver similar advantages. The volatile nature of the oil is likely to lead to unsafe conditions in the vicinity of fresh hydrocarbon. There are also secondary contamination and waste issues to consider.

4.2.3.4 In-situ Burning

This technique requires calm sea state conditions as is required for containment and recovery operations, which limits its feasibility in the offshore waters of the Operational Area. Optimum weather conditions are <20 knot wind speed and waves <1 to 1.5 m with oil collected to a minimum 3mm thick layer. Due to the conditions in Operational Area it is expected that the ability to contain oil may be limited as the sea state may exceed the optimum conditions. It is preferable that oil is fresh and does not emulsify to maximise burn efficiency and reduce residue thickness.

There are health and safety risks for response personnel associated with the containment and subsequent burning of hydrocarbons. It is also suggested that the residue from attempts to burn would sink, thereby posing a risk to the environment. The longer-term effects of burn residues on the marine environment are not fully understood and therefore, no assessment of the potential environmental impact can be determined. Furthermore, it is unlikely that MDO would achieve the required thickness for in-situ burning, rendering this an unsuitable method.

Until further operational and environmental information becomes available, Woodside will not consider this option.

4.2.3.5 Shoreline Protection and Deflection and Clean Up

No shoreline surface contact is predicted (above thresholds), according to the modelling of a hydrocarbon spill conducted for this PAP. Therefore, shoreline protection and deflection is not considered feasible.

4.3 Stage 2: Predict Outcomes

Woodside uses planning scenarios to assess potential impacts and response options for specific locations. Locations with potential environmental impacts, selected from the stochastic modelling are

included for assessment. Response thresholds and modelling results are then used to assess the feasibility/effectiveness of a response.

4.4 Stage 3: Balance trade-offs

Woodside considers environmental impacts and response effectiveness/feasibility to determine the most effective oil spill response tools and balance trade-offs, using an automated NEBA tool. The tool considers potential benefits and impacts associated with a response at sensitive receptors and then considers the effectiveness/feasibility of the response to select the response techniques carried forward to the ALARP assessment. The NEBA can be found in **ANNEX A: Net Environmental Benefit Analysis** detailed outcomes.

4.5 Stage 4: Select Best Response Options

To select the response technique, all the other stages in the NEBA process are considered and used to establish response plans and any pre-approvals to support protection of identified environmental and social values.

The response techniques implemented may vary according to a particular spill. The hydrocarbon type released and the sensitivities of the receptors (both ecological and socio-economic) may influence the response. The pre-operational NEBA broadly evaluates each response technique and supports decisions on whether they are feasible and of net environmental benefit. Response techniques that are not feasible or beneficial are rejected at this stage and not progressed to planning.

Further risks and impacts from implementing these selected response options are outlined in **Section 7**.

Table 4-3: Selection and prioritisation of response techniques

Response planning scenario	Key characteristics for response planning (times are minimum times to contact for first receptor and/or shoreline contacted above response threshold)	Feasibility of response techniques										
		Monitor and evaluate	Source control (vessel)	Surface dispersant application	Containment and recovery	Mechanical dispersion	In situ burning	Shoreline protection and deflection	Shoreline clean-up	Oiled wildlife response	Outline response technique	
Credible Scenario-01: Release of up to 250 m ³ marine diesel from a vessel collision	No shoreline contact predicted. The Gascoyne AMP is predicted to receive entrained oil concentrations at the 100 ppb threshold with a probability of 4%	Yes	Yes	No	No	No	No	No	No	No	Yes	Monitor and evaluate. Initiate vessel source control if feasible. Plan for oiled wildlife response and implement if oiled wildlife is observed.

From the NEBA undertaken on the WCCS identified the primary response techniques are;

- Monitor and evaluate
 - Source control on the vessel
 - Oiled wildlife response
- Support techniques may include:
- Waste management
 - Scientific monitoring

5 HYDROCARBON SPILL ALARP PROCESS

Woodside's hydrocarbon spill ALARP process is aligned with guidance provided by NOPSEMA in *Oil Spill Risk Management Guidance Note N-04750-GN1488* (2021) and is set out in the 'Woodside Hydrocarbon Spill Oil Spill Preparedness and Response Mitigation Assessment (OSPRMA) Development Guidelines'.

From the identified response planning need and pre-operational NEBA/SIMA, Woodside conducts a structured, semi-quantitative hydrocarbon spill process which has the following steps:

1. considers the Response Planning Need identified in terms of surface area (km²) and available surface hydrocarbon volumes (m³) against existing Woodside capability
2. considers alternative, additional, and improved options for each response technique/control measure by providing an initial and, if required, detailed evaluation of:
 - predicted cost associated with adopting the control measure
 - predicted change/environmental benefit
 - predicted effectiveness/feasibility of the control measure.
3. evaluates the risks and impacts of implementing the proposed response techniques, and any further control measures with associated environmental performance to manage these additional risks and impacts.

Woodside considers the risks and impacts from a hydrocarbon spill to have been reduced to ALARP when:

1. a structured process for identifying and considering alternative, additional, and improved options has been completed for each selected response technique
2. the analysis of alternate, additional, and improved control measures meets one of the following criteria:
 - all identified, reasonably practicable control measures have been adopted; or
 - no identified reasonably practicable additional, alternative and/or improved control measures would provide further overall increased proportionate environmental benefit; or
 - no reasonably practical additional, alternative, and/or improved control measures have been identified.
3. where an alternative, additional and/or improved control measure is adopted, a measurable level of environmental performance has been assigned
4. higher order impacts/ risks have received more comprehensive alternative, additional, and improved control measure evaluations and do not just compare the cost of the adopted control measures to the costs of an extreme or clearly unreasonable control measure
5. cumulative effects have been analysed when considered in combination across the whole activity.

The response technique selection is based on the risk assessment conducted in the EP. The risk assessment identifies the type of oil, volume of release, duration of release, predicted fate, weathering and the EMBA (along with other requirements such as time to impact and predicted volumes ashore). Modelling is then used to inform the NEBA and the prioritisation of suitable response options. The scale of the response techniques selected in the pre-operational NEBA is informed through the assessment of results from modelling.

For the purpose of the ALARP assessment, the following terms and definitions have been used:

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- Response techniques are considered the control measures that reduce consequences from hydrocarbon spill events. The terms 'response technique' and 'control measure' are used interchangeably.
- Cost is defined as the time, effort and/or trouble taken in financial, safety, design/storage/installation, capital/lease, and/or operations/maintenance terms to adopt a control measure.
- Where the predicted change to environmental impact is compared against standard environmental values and sensitivities impacts using positive or negative criteria from the NEBA Impact Ranking Classification Guidance in Annex A.

5.1 Monitor and Evaluate (including operational monitoring)

Monitor and evaluate includes the gathering and evaluation of data to inform the oil spill response planning and operations. It includes fate and trajectory modelling, spill tracking, weather updates and field observations. This response option is deployed in some capacity for every event.

Table 5-1 below provides the operations monitoring plans that support the successful execution of this response technique.

Table 5-1: Description of supporting operational monitoring plans

ID	Title
OM01	Predictive modelling of hydrocarbons to assess resources at risk
OM02	Surveillance and reconnaissance to detect hydrocarbons and resources at risk
OM03	Monitoring of hydrocarbon presence, properties, behaviour and weathering in water
OM04	Pre-emptive assessment of sensitive receptors at risk
OM05	Shoreline assessment

Woodside maintains an *Operational Monitoring Operational Plan*. If shoreline contact is predicted, RPAs will be identified and assessed before contact. If shorelines are contacted, a shoreline assessment survey will be completed to guide effective shoreline clean-up operations. This plan includes the process for the IMT to mobilise resources depending on the nature and scale of the spill.

The proximity of Exmouth, Onslow and Karratha to the spill event location means that multiple logistical options are available to monitor the spill in relatively short timeframes. The primary mobilisation base for initial monitoring activities would be Exmouth. However, in the unlikely event of an extended spill with potential to impact receptors further afield, monitoring activities may also be mobilised from Onslow and Karratha.

5.1.1 Response need based on predicted consequence parameters

The following statements identify the key parameters upon which a response need can be based:

- No floating oil is predicted at $>10 \text{ g/m}^2$ for the duration of the spill.
- No shoreline receptors are predicted to be contacted by floating oil concentrations at any of the assessed thresholds.
- No accumulation of oil on shorelines is predicted.
- The time to contact for oil at concentrations of entrained hydrocarbons greater than 100 ppb at shoreline receptors is 63 hours at the Gascoyne AMP.
- Arrangements for support organisations who provide specialist services or resources should be tested regularly.
- Plans, procedures and support documents need to be in place for Operational and Support functions. These should be reviewed and updated regularly.

5.1.2 Environmental performance based on need

Table 5-2: Environmental Performance – Monitor and Evaluate

Environmental Performance Outcome		To gather information from multiple sources to establish an accurate common operating picture as soon as possible and predict the fate and behaviour of the spill to validate planning assumptions and adjust response plans as appropriate to the scenario.		
Control measure		Performance Standard		Measurement Criteria
1	Oil spill trajectory modelling	1.1	Initial modelling available within 6 hours using the Rapid Assessment Tool	1, 3B, 3C, 4
		1.2	Detailed modelling available within 4 hours of RPS receiving information from Woodside	
		1.3	Detailed modelling service available for the duration of the incident upon contract activation	
2	Tracking buoy	2.1	Tracking buoy located on facility/vessel and ready for deployment 24/7	1, 3A, 3C, 4
		2.2	Deploy tracking buoy from facility within 2 hours as per the First Strike Plan.	1, 3A, 3B, 4
		2.3	Contract in place with service provider to allow data from tracking buoy to be received 24/7 and processed.	1, 3B, 3C, 4
		2.4	Data received to be uploaded into Woodside COP daily to improve the accuracy of other monitor and evaluate techniques.	1, 3B, 4
3	Satellite imagery	3.1	Contract in place with 3 rd party provider to enable access and analysis of satellite imagery. Imagery source/type requested on activation of service.	1, 3C, 4
		3.2	3rd party provider will confirm availability of an initial acquisition within 2 hours.	1, 3B, 3C, 4
		3.3	First image received with 24 hours of Woodside confirming to 3rd party provider its acceptance of the proposed acquisition plan.	1
		3.4	3rd party provider to submit report to Woodside per image. Report is to include a polygon of any possible or identified slick(s) with metadata.	1
		3.5	Data received to be uploaded into Woodside COP daily to improve accuracy of other monitor and evaluate techniques.	1, 3B, 4
		3.6	Satellite Imagery services available and employed during response.	1, 3C, 4
4	Aerial surveillance	4.1	At least 2 trained aerial observers available to be deployed by day 1 from resource pool.	1, 2, 3B, 3C, 4
		4.2	1 aircraft available for two sorties per day, available for the duration of the response from day 1	1, 3C, 4
		4.3	Observer to compile report during flight as per first strike plan. Observers report available to the IMT within 2 hours of landing after each sortie.	1, 2, 3B, 4
		4.4	Unmanned Aerial Vehicles/Systems (UAV/UASs) to support pre-emptive assessments as contingency if required.	1, 2
5	Hydrocarbon detections in water	5.1	Activate 3rd party service provider as per first strike plan. Deploy resources within 3 days: <ul style="list-style-type: none"> 3 specialists in water quality monitoring 2 monitoring systems and ancillaries 1 vessel for deploying the monitoring systems with a dedicated winch, A-frame or Hiab and ancillaries to deploy the equipment. 	1, 2, 3C, 3D, 4
		5.2	Water monitoring services available and employed during response.	1, 3C, 4
		5.3	Preliminary results of water sample as per contractor's implementation plan within 7 days of receipt of samples at the accredited lab.	

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Environmental Performance Outcome		To gather information from multiple sources to establish an accurate common operating picture as soon as possible and predict the fate and behaviour of the spill to validate planning assumptions and adjust response plans as appropriate to the scenario.		
Control measure		Performance Standard	Measurement Criteria	
		5.4	Daily fluorometry reports as per service provider's implementation plan will be provided to IMT to validate modelling and monitor presence/absence of entrained hydrocarbons.	
		5.5	Use of Autonomous Underwater Vehicles (AUVs) for hydrocarbon presence and detection may be used as a contingency if the operational NEBA confirms conventional methods are unsafe or not possible.	1, 2, 3C, 4
6	Pre-emptive assessment of sensitive receptors	6.1	10 days prior to any predicted impact, in agreement with WA DoT (for Level 2/3 incidents), deployment of 2 specialists from resource pool in establishing the status of sensitive receptors.	1, 2, 3B, 3C, 4
		6.2	Daily reports provided to IMT on the status of the receptors to prioritise Response Protection Areas (RPAs) and maximise effective utilisation of resources.	1, 3B, 4
7	Management of environmental impact of the response risks	7.1	If vessels are required for access, anchoring locations will be selected to minimise disturbance to benthic habitats. Where existing fixed anchoring points are not available, locations will be selected to minimise impact to nearshore benthic environments with a preference for areas of sandy seabed where they can be identified.	1

The control measures and capability of Woodside and its third-party service providers are shown to support Monitor and Evaluate activities up to and including the identified WCCS. This is demonstrated by the following:

- Woodside has a documented, structured and tested capability for Monitor and Evaluate operations including internal trajectory modelling capabilities, tracking buoys located offshore and contracted aerial observation platforms with access to trained observers.
- Woodside and its third-party service providers ensure there is sufficient capability for the duration of the response.
- Woodside has assessed the existing capability available and considered potential alternative, additional and improved control measures. Where control measures have been selected and implemented, they are included in **Section 6.1**.
- The health and safety, financial, capital and operations/maintenance costs of implementing the alternative, additional or improved control measures identified and not carried forward are considered grossly disproportionate to the environmental benefit gained and/or not reasonably practicable for this PAP.
- The Monitor and Evaluate capability outlined in this section is part of the response developed to manage potential risks and impacts associated with the scenarios to ALARP, and there are no further additional, alternative and improved control measures other than those implemented that would provide further benefit.

5.2 Source Control via Vessel SOPEP

Vessel source control will be conducted, where feasible and in accordance with MARPOL 73/78 Annex I, by the Vessel Master under the Shipboard Oil Pollution Emergency Plan (SOPEP) triggered by any loss of containment from the PAP vessels.

The SOPEP provides guidance to the Master and Officers on board the vessel with respect to the extra steps to be taken when an unexpected pollution incident has occurred or is likely to occur. The SOPEP contains all information and operational instructions required by IMO Resolution MEPC.54 (32) adopted on 6 March 1992, as amended by resolution MEPC.86 (44) adopted on 13 March 2000.

Its purpose is to set in motion the necessary actions to stop or minimise oil discharge and mitigate its effects and outlines responsibilities, pollution reporting requirements, procedures and resources needed in the event of a hydrocarbon spill from vessel activities.

In the event of a potential vessel collision, the vessel master may engage precautionary marine manoeuvres to avoid collision or commence pumping operations to transfer marine diesel and thus minimise the release.

5.2.1 Environmental performance based on need

Woodside has established control measures, environmental performance outcomes, performance standards and measurement criteria to be used for vessel-source oil spill response during the PAP which are detailed in Section 6.7 of the EP. The vessel master's roles and responsibilities are described in EP Section 7.3.

Performance standards for each contracted PAP vessel are detailed in the vessel's specific SOPEP.

These standards ensure that sufficient resources are available and are adequately tested to ensure implementation of the SOPEP in the event of a hydrocarbon spill.

5.3 Oiled wildlife response (including hazing)

Woodside would implement a response in accordance with the Western Australian *Oiled Wildlife Operational Plan (WA OWRP)*. This plan includes the process for the IMT to mobilise resources depending on the nature and scale of the spill. Oiled wildlife operations would be implemented with advice and assistance from the Oiled Wildlife Advisor from the DBCA.

Oiled wildlife response is undertaken in accordance with the Western Australian Oiled Wildlife Response Plan to ensure it is conducted in accordance with legislative requirements under the Animal Welfare Act 2002.

If there is a net environmental benefit, oiled wildlife operations will be conducted 24 hours per day to reduce the time for rehabilitation and release of oiled wildlife. Hazing and pre-emptive capture techniques to keep non-oiled animals away from contaminated habitat in instances where it is deemed appropriate will be conducted in accordance with the Western Australian Oiled Wildlife Response Plan, specifically vessels used in hazing/pre-emptive capture will approach fauna at slow speeds to ensure animals are not directed towards the oil and deterrence/hazing and pre-emptive capture will only be conducted if Woodside has licensed authority from DBCA and approval from the Incident Controller.

Shoreline access will be considered as part of the operational NEBA. Vehicular access would be restricted on dunes, turtle nesting beaches and in mangroves. Woodside retains specialist personnel to support and manage oiled wildlife operations, including trained and competent responders in Exmouth and Onslow. Additional personnel would be sourced through Woodside's arrangements to support an oiled wildlife response as required.

5.3.1 Response need based on predicted consequence parameters

The following statements identify the key parameters upon which a response need can be based:

- No shoreline contact is predicted.
- No floating oil is predicted at $>10 \text{ g/m}^2$ for the duration of the spill.
- The offshore location of the release site is expected to result in low numbers of at-risk or impacted wildlife.

Table 5-3: Key at-risk species potentially in Priority Protection Areas and open ocean

Species	Open ocean
Marine turtles (including foraging and inter-nesting areas and significant nesting beaches)	✓
Whale sharks (migration to and from waters at Ningaloo)	✓
Seabirds and/or migratory shorebirds	✓
Cetaceans – migratory whales	✓
Cetaceans – dolphins and porpoises	✓
Sea snakes	✓

The oiled wildlife response technique targets key wildlife populations at risk within Commonwealth open waters and the nearshore waters. Responding to oiled wildlife consists of eight key stages, as described in **Table 5-4** below.

Table 5-4: Oiled wildlife response stages

Stage	Description
Stage 1: Wildlife first strike response	Gather situational awareness including potential wildlife assets at risk.
Stage 2: Mobilisation of wildlife resources	Resources include personnel, equipment and facilities.

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Stage	Description
Stage 3: Wildlife reconnaissance	Reconnaissance to identify potentially affected animals.
Stage 4: IAP wildlife sub-plan development	The IAP includes the appropriate response options for oiled wildlife, including wildlife priorities for protection from oiling; deterrence measures (see below); and recovery and treatment of oiled wildlife; resourcing of equipment and personnel. It includes consideration of deterrence practices such as 'hazing' to prevent fauna from entering areas potentially contaminated by spilled hydrocarbons, as well as dispersing, displacing or relocating fauna to minimise/prevent contact and provide time for clean-up.
Stage 5: Wildlife rescue and staging	This includes the different roles of finding oiled wildlife, capturing wildlife, and holding and/or transportation of wildlife to oiled wildlife facilities.
Stage 6: Establishment of an oiled wildlife facility	Treatment facilities would be required for the first-aid, cleaning and rehabilitation of affected animals. A vessel-based 'on-water' facility would likely need to be established to enable stabilisation of oiled wildlife before transport to a suitable treatment facility. Suitable staging sites in Exmouth and Onslow have been identified in the draft Regional OWROP, should a land-based site be required.
Stage 7: Wildlife rehabilitation	Considerations include a suitable rehabilitation centre and personnel, wildlife housing, record keeping and success tracking.
Stage 8: Oiled wildlife response termination	Once a decision has been made to terminate operations, the Incident Controller will stand down individual participating and supporting agencies.

Reconnaissance and primary response would be done during operational monitoring and surveillance activities. Where marine fauna are observed on water or transiting near or within the spill area, observations would be recorded through surveillance records.

Staging sites may be established as forward bases for vessel-based field teams. Once recovered to a staging site, wildlife would be transported to the designated oiled wildlife facility or a temporary holding centre (before being transported to the oiled wildlife facility). Temporary holding centres are required when there is significant distance between a staging site and the oiled wildlife facility, to enable stabilisation of oiled animals. The oiled wildlife facility is the primary location where animals would be housed and treated. Sites proposed for staging a regional oiled wildlife response in Exmouth and Onslow have been identified.

To deploy a response that is appropriate to the nature and scale of the event, as well as scalable over time, Woodside would implement an oiled wildlife response in consultation with DBCA and use the capability outlined in the WA OWRP, with additional capability if required (e.g. volunteers) accessible through Woodside's *People and Global Capability Surge Labour Requirement Plan*.

The WA OWRP provides indicative oiled wildlife response levels (**Table 5-5**) and the resources likely to be needed at each increasing level of response.

Table 5-5: Indicative oiled wildlife response level (adapted from the WA OWRP, 2014)

OWR Level	Indicative personnel numbers	Indicative duration	Indicative number of birds (non-threatened species)	Indicative number of birds (threatened species)	Turtles (hatchlings, juveniles, adults)	Cetaceans
Level 1	6	< 3 days	1–2/day < 5 total	None	None	None
Level 2	26	> 4–14 days	1–5/day < 20 total	None	< 20 hatchlings No juv/adults	None
Level 3	59	> 4–14 days	5–10/day	1–5/day < 10 total	< 5 juv/adults < 50 hatchlings	None
Level 4	77	> 4–14 days	5–10/day < 200 total	5–10/day	< 20 juv/adults < 500 hatchlings	< 5, or known habitats affected
Level 5	116	> 4–14 days	10–100/day > 200 total	10–50/day	> 20 juv/adults > 500 hatchlings	< 5 dolphins
Level 6	122	> 4–14 days	> 100/day	10–50/day	> 20 juv/adults > 500 hatchlings	> 5 dolphins

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5.3.2 Environmental performance based on need

Table 5-6: Environmental Performance – Oiled Wildlife Response

Environmental Performance Outcome		Oiled Wildlife Response is conducted in accordance with WA OWRP to ensure it is conducted in accordance with legislative requirements to house, release or euthanise fauna under the Animal Welfare Act 2002.		
Control Measure		Performance Standard	Measurement Criteria	
8	Wildlife response equipment	8.1	Contracted capability to treat 100 individual fauna for immediate mobilisation to Response Priority Areas (RPAs)	1, 3A, 3B, 3C, 4
		8.2	Contracted capability to treat up to an additional 250 individual fauna within a five-day period.	
		8.3	National plan access to additional resources under the guidance of the DoT (up to a Level 5 oiled wildlife response as specified in the WA OWRP), with the ability to treat about 600 individual fauna.	1, 3C, 4
		8.4	Vessels used in hazing/pre-emptive capture will approach fauna at slow speeds to ensure animals are not directed towards the hydrocarbons.	1, 3A, 3B, 4
		8.5	Facilities for the rehabilitation of oiled wildlife are operational 24/7 as per WA OWRP.	1, 3A, 4
9	Wildlife responders	9.1	2 wildlife divisional commanders to lead the oiled wildlife operations who have completed an Oiled Wildlife Response Management course	1, 2, 3B
		9.2	Wildlife responders to be accessed through resource pool and additional agreements with specialist providers	1, 2, 3A, 3B, 3C, 4
		9.3	Oiled wildlife operations (including hazing) would be implemented with advice and assistance from the Oiled Wildlife Advisor from the DBCA.	1
		9.4	Open communication line to be maintained between IMT and infield operations to ensure awareness of progress against plan(s)	1, 3A, 3B

The resulting wildlife response capability has been assessed against the WCCS.

Under optimal conditions, during the surface release the capability available meets the need identified. It indicates that, the wildlife response capability has the following expected performance:

- Mobilisation and deployment of approximately two wildlife collection teams within the first 5 days of the incident (if required) which may provide an oiled wildlife response in offshore waters.
- Mobilisation and deployment of two central wildlife treatment and rehabilitation locations at Exmouth and Onslow in accordance with WA OWRP.

No additional capability will be required for this activity, given the oiled wildlife response will be limited to open water.

Recovered wildlife from open water would be transported to a central treatment location at Exmouth or Onslow.

5.4 Waste Management

Waste management is considered a support technique to oiled wildlife response, containment and recovery and shoreline clean-up. For the purposes of this OSPRMA, waste management may be required to support wildlife response. Waste generated and collected during the response that will require handling, management and disposal may consist of:

- Liquids (hydrocarbons and contaminated liquids) collected during wildlife response, and/or
- Solids/semi-solids (oily solids, garbage, contaminated materials) and debris collected during wildlife response.

Expected waste volumes during an event are likely to vary depending on oil type, volume released, response techniques employed and extent of weathering of hydrocarbons. Waste management, handling and capacity should be scalable to ensure continuous response operations can be maintained.

All waste management activities will follow the Environment Protection (Controlled Waste) Regulations 2004 and the waste will be managed to minimise final disposal volumes. Waste treatment techniques will consider contaminated solids treatment to allow disposal to landfill and solids with high concentrations of hydrocarbon will be treated and recycled where possible or used in clean fill if suitable.

The waste products would be transported from response locations to the nearest suitable staging area/waste transfer station for treatment, disposal or recycling. Waste will be transferred with appropriately licensed vehicles. Containers will be available for temporary waste storage and will be:

- labelled with the waste type
- provided with appropriate lids to prevent waste being blown overboard
- banded if storing liquid wastes.
- processes will be in place for transfers of bulk liquid wastes and include:
 - inspection of transfer hose undertaken prior to transfer
 - watchman equipped with radio visually monitors loading hose during transfer
 - tank gauges monitored throughout operation to prevent overflow

The *Oil Spill Preparedness Waste Management Support Plan* details the procedures, capability and capacity in place between Woodside and its primary waste services contractor (Veolia Waste Management) to manage waste volumes generated from response activities.

5.4.1 Response Need Based on Predicted Consequence Parameters

Table 5-7: Response Planning Assumptions – Waste Management

Response planning assumptions: Waste management	
Waste loading per m³ oil recovered (multiplier)	Oiled wildlife response – approx. 1m ³ of oily liquid waste generated for each wildlife unit cleaned

5.4.2 Environmental Performance Based on Need

Table 5-8: Environmental Performance – Waste Management

Environmental Performance Outcome		To minimise further impacts, waste will be managed, tracked and disposed of in accordance with laws and regulations.		
Control Measure		Performance Standard		Measurement Criteria
10	Waste Management	10.1	Contract with waste management services for transport, removal, treatment and disposal of waste.	1, 3A, 3B, 3C, 4
		10.2	Access to at least 50 m ³ of solid and liquid waste storage available within 1 week upon activation of 3 rd party contract.	
		10.3	Recovered hydrocarbons and wastes will be transferred to licensed treatment facility for reprocessing or disposal.	
		10.4	Teams will segregate liquid and solid wastes at the earliest opportunity.	
		10.5	Waste management provider support staff available year-round to assist in the event of an incident with waste management as detailed in contract.	
		10.6	Open communication line to be maintained between IMT and waste management services to ensure the reliable flow of accurate information between parties.	1, 3A, 3B
		10.7	Waste management to be conducted in accordance with Australian laws and regulations.	1, 3A, 3B, 3C, 4
		10.8	Waste management services available and employed during response.	
11	Management of environmental impact of the response risks	11.1	All oiled wildlife response sites zoned and marked before operations commence to prevent secondary contamination and minimise the mixing of clean and oiled waste.	

The resulting waste management capability has been assessed against the WCCS. The range of techniques provide an ongoing approach to waste management from oiled wildlife response.

It indicates that the waste management capability has the following expected performance:

- Woodside has assessed the existing capability available and considered potential alternative, additional and improved control measures.
- The waste management requirements of all credible spill scenarios are well within Woodside's and its service providers existing capacity.
- No further control measures that may result in an increased environmental benefit that involve moderate to significant cost and/or dedication of resources have been adopted as the requirements of this technique does not justify the excessive costs of identified alternate, improved or additional controls.

5.5 Scientific monitoring

A scientific monitoring program (SMP) would be activated following a Level 2 or 3 unplanned hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors. This would consider receptors at risk (ecological and socio-economic) for the entire predicted Environment that Maybe Affected (EMBA) and in particular, any identified Pre-emptive Baseline Areas (PBAs) for the credible spill scenario(s) or other identified unplanned hydrocarbon releases associated with the activity (refer to Table 2 1 Activity credible spill scenarios).

The outputs of the stochastic hydrocarbon spill modelling were used to assess the environmental risk of the hydrocarbon affected area as delineated by the ecological impact EMBA and social-cultural EMBA based on exceedance of environmental and social-cultural hydrocarbon threshold concentrations (refer to Table 2 2, Section 2.3.1.1 and see Section 4 and 6 of the EP for further information on applicable thresholds and the EMBAs). The Petroleum Activities Program vessel collision marine diesel spill (CS-01) has been modelled and considered to determine the WCCS for the SMP planning purposes and is the basis of the SMP approach presented in this section.

It should be noted that the resulting SMP receptor locations may differ from the Response Protection Areas (RPAs) presented and as discussed in Section 3 of this document due to the applicability of different hydrocarbon threshold levels. The SMP would be informed by the data collected via the operational monitoring program (OMP) studies, however, it differs from the OMP in being a long-term program independent of, and not directing, the operational oil spill response or monitoring of impacts from response activities (refer to Section 5.1 Monitor and Evaluate) for the operational monitoring overview.

Key objectives of the Woodside oil spill scientific monitoring program are:

- Assess the extent, severity and persistence of the environmental impacts from the spill event.
- Monitor subsequent recovery of impacted key species, habitats and ecosystems.

The SMP comprises ten targeted environmental monitoring programs to assess the condition of a range of physical-chemical (water and sediment) and biological (species and habitats) receptors including Environment Protection and Biodiversity Conservation Act (EPBC Act 1999) listed species, environmental values associated with protected areas and socio-economic values, such as fisheries. The ten SMPs are as follows:

- SM01 – Assessment of the presence, quantity and character of hydrocarbons in marine waters (linked to OM01 to OM03)
- SM02 – Assessment of the presence, quantity and character of hydrocarbons in marine sediments (linked to OM01 and OM05)
- SM03– Assessment of impacts and recovery of subtidal and intertidal benthos
- SM04 – Assessment of impacts and recovery of mangroves/saltmarsh habitat
- SM05 – Assessment of impacts and recovery of seabird and shorebird populations
- SM06 – Assessment of impacts and recovery of nesting marine turtle populations
- SM07 – Assessment of impacts to pinniped colonies including haul-out site populations
- SM08 – Desktop assessment of impacts to other non-avian marine megafauna
- SM09 – Assessment of impacts and recovery of marine fish (linked to SM03)
- SM10 – Assessment of physiological impacts to important fish and shellfish species (fish health and seafood quality/safety) and recovery.

These SMPs have been designed to cover all key tropical and temperate habitats and species within Australian waters and broader, if required. A planning area for scientific monitoring is also identified to acknowledge potential hydrocarbon contact below the environmental threshold concentrations and beyond the EMBA. This planning area has been set with reference to the entrained low exposure value of 10 ppb detailed in NOPSEMA Bulletin #1 Oil Spill Modelling (2019), as shown in Figure 5-1.

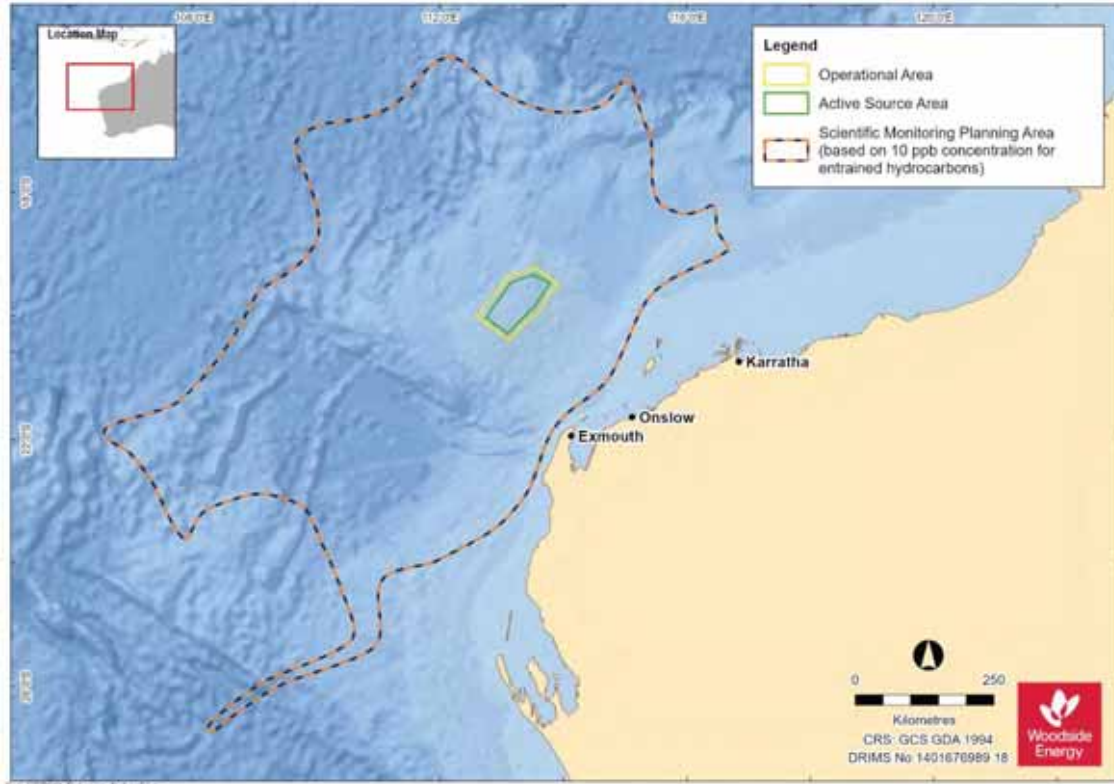


Figure 5-1: The planning area for scientific monitoring based on the area potentially contacted by the low (below ecological impact) entrained hydrocarbon threshold of 10 ppb in the event of the credible spill scenario (CS-01).

NOTE: Figure 5-1 represents the overall combined extent of the oil spill model outputs based on a total of 200 replicate simulations over an annual period for CS-01 and therefore represents the largest spatial boundaries of 200 CS-01 oil spill combinations, and not the spatial extent of a single CS-01 spill.

5.5.1 Scientific Monitoring Deployment Considerations

Scientific Monitoring Deployment Considerations	
Existing baseline studies for sensitive receptor locations predicted to be affected by a spill	<p>Pre-emptive Baseline Areas (PBAs) of the following two categories:</p> <ul style="list-style-type: none"> PBAs within the predicted < 10-day hydrocarbon contact time prediction: As part of this assessment, the approach was to conduct a desktop review of available and appropriate baseline data for key receptors for locations (if any) that are potentially impacted within ten days of a spill (based on the EMBA). Then investigate the need to conduct baseline data collection to address data gaps and demonstrate spill response preparedness (refer to Annex D). In the scenario, that baseline data needs are identified, planning for baseline data acquisition is typically commenced pre-PAP and execution of studies undertaken with consideration of weather, receptor type, seasonality and temporal assessment requirements. PBAs predicted > 10 days' time to predicted hydrocarbon contact in the event of an unplanned hydrocarbon release (for the worse case spill scenario). As part of this assessment, a desktop review is conducted of available and appropriate baseline data for key receptors for locations (if any) that are potentially impacted >10 days' time of a hydrocarbon spill event and documented (refer to Section 5.5.2). In the event of a spill, the SMP activation (as per the Scarborough 4D Marine Seismic Survey First Strike Plan) directs the SMP team to follow the steps outlined in the SMP Operational Plan. The steps include: checking the availability and type of existing baseline data, with particular reference to any Pre-emptive Baseline Areas (PBAs) identified as >10 days to hydrocarbon contact. Such information is used to identify response phase PBAs and plan for the activation of SMPs for pre-emptive (i.e. pre-hydrocarbon contact) baseline assessment.
Pre-emptive Baseline in the event of a spill	Activation of SMPs in order to collect baseline data at sensitive receptor locations with predicted hydrocarbon contact time > 10 days (refer to Section 5.5.2) and the process (as documented in ANNEX C: Oil Spill Scientific monitoring Program).
Survey platform suitability and availability	In the event of the SMP activation, suitable survey platforms are available and can support the range of equipment and data collection methodologies to be implemented in nearshore and offshore marine environments.
Trained personnel to implement SMPs suitable and available	Access to trained personnel and the sampling equipment contracted for scientific monitoring via a dedicated scientific monitoring program standby contract.
Met-ocean conditions	<p>The following met-ocean conditions have been identified as the field operational limits for implementing SMPs:</p> <ul style="list-style-type: none"> waves < 1 m for nearshore systems waves < 1.5 m for offshore systems winds < 20 knots daylight operations only. <p>SMP implementation will be planned and managed according to HSE risk reviews and the met-ocean conditions on a day-to-day basis by SMP operations.</p>

5.5.2 Response planning assumptions

Response Planning Assumptions	
Pre-emptive Baseline Areas (PBAs)	<p>Pre-emptive Baseline Areas (PBAs) identified through the application of defined hydrocarbon impact thresholds during the Quantitative Spill Risk Assessment process and a consideration of the minimum time to contact at receptor locations fall into two categories:</p> <ul style="list-style-type: none"> PBAs for which baseline data exist or are planned for and data collection may commence pre-PAP (\leq 10 days minimum time to contact). PBAs (> 10 days minimum time to contact) for which baseline data may be collected in the event of an unplanned hydrocarbon release. In the event of a spill, response phase PBAs are prioritised for SMP activities based on vulnerability (i.e. time to contact and

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	<p>environmental sensitivity) to potential impacts from hydrocarbon contact and as well as the identified need to acquire baseline data.</p> <p>Time to hydrocarbon contact of >10 days has been identified as a minimum timeframe within which it is feasible to plan and mobilise applicable SMPs and commence collection of baseline (pre-hydrocarbon contact) data, in the event of an unplanned hydrocarbon release from the Scarborough 4D Marine Seismic Survey operations.</p> <p>Pre-emptive Baseline Areas for the Scarborough 4D Marine Seismic Survey operations are identified and listed in ANNEX D, Table D-1. The PBAs together with the situational awareness (from the operational monitoring) are the basis for the response phase SMP planning and implementation.</p>
Pre-Spill	<p>Scarborough 4D Marine Seismic Survey operations:</p> <p>A review of existing baseline data for receptor locations (refer to Annex D) with potential to be contacted entrained hydrocarbons at environmental thresholds within ≤10 days, relating to the credible hydrocarbon release for Scarborough 4D Marine Seismic Survey has identified the offshore open waters of the Commonwealth Marine Environment (MNEs) but no submerged or shoreline sensitive receptors contacted by the hydrocarbon release.</p> <p>Australian Marine Parks (AMPs) potentially affected includes:</p> <ul style="list-style-type: none"> • Gascoyne AMP <p>All the Australian Marine Parks (AMPs) are located in offshore waters where hydrocarbon exposure is possible on surface waters and in the upper layers of the water column.</p>
In the Event of a Spill	<p>Receptor locations with >10 days to hydrocarbon contact, as well as the wider area, will be investigated and identified by the SMP team (in the Environment Unit of the CIMT) as the spill event unfolds and as the situational awareness provided by the OMPs permits delineation of the spill affected area (for example, updates to the spill trajectory tracking). Based on the PAP worst case credible spill CS-01 (Table 2-1), the hydrocarbon spill affected area remains offshore (within the Commonwealth Marine Environment) with expanding hydrocarbon exposure in the upper water column of the Gascoyne AMP.</p> <p>The unfolding spill affected area predictions and confirmation of appropriate baseline data will determine the selection of receptor locations and SMPs to be activated in order to gather pre-emptive (pre-hydrocarbon contact) data. Refer to ANNEX C for further details on scientific monitoring plan implementation and delivery). The timing of SMP activation and mobilisation of the individual SMPs to undertake data collection will be decided and documented by the Woodside SMP team following the process outlined in the SMP Operational Plan.</p> <p>In the event key receptors within geographic locations that are potentially impacted after 10 days following a spill event or commencement of the spill and where adequate and appropriate baseline data are not available, there will be a response phase effort to collect baseline data for the following purposes:</p> <ol style="list-style-type: none"> i. Priority will be given to the collection of baseline data for receptors predicted to be within the spill affected area prior to hydrocarbon contact. The process is initiated with the investigation of available baseline and time to hydrocarbon contact (>10 days which is sufficient time to mobilise SMP teams and acquire data before hydrocarbon contact). No receptor locations have been identified at this time for the Scarborough 4D MSS operations. ii. Highly sensitive and/or valued habitats and communities in coastal waters will be prioritised for pre-emptive baseline surveys over open water areas of AMPs. iii. Collect baseline data for receptors predicted to be outside the spill affected area so reference datasets for comparative analysis with impacted receptor types can be assessed post-spill.
Baseline Data	<p>A summary of the spill affected area and receptor locations as defined by the EMBA for the activity WCCS CS-01 are presented in Section 6 of the Scarborough 4D B1 MSS Environment Plan.</p> <p>The key receptors at risk by location and corresponding SMPs based on the EMBA for the PAP are presented in ANNEX D, as per credible spill event scenario(s). This matrix maps</p>

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	<p>the receptors at risk with their location and the applicable SMPs that may be triggered in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors. Receptor locations and applicable SMPs are colour coded to highlight possible time to contact based on receptor types and locations.</p> <p>The status of baseline studies relevant to the PAP are tracked by Woodside through the maintenance of a Corporate Environment Environmental Baseline Database (managed by the Woodside Environmental Science team), as well as accessing external databases such as the Department of Water and Environmental Regulation (WA) Index of Marine Surveys for Assessment (IMSA)[¹] (refer to ANNEX C: Oil Spill Scientific Monitoring Program).</p>
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5.5.3 Summary – scientific monitoring

The resulting scientific monitoring capability has been assessed against the PAP credible spill scenario. The range of techniques provide an ongoing approach to monitoring operations to assess and evaluate the scale and extent of impacts. All known reasonably practicable control measures have been adopted with the cost and organisational complexity of these options determined to be moderate and the overall delivery effectiveness determined to be medium. The SMP's main objectives can be met, with no additional, alternative or improved control measures providing further benefit.

5.5.4 Response planning: need, capability and gap – scientific monitoring

The receptor locations identified in Annex D provide the basis of the SMPs likely to be selected and activated. Once the Woodside SMP Delivery team and the SMP standby contractor have been stood up and the exact nature and scale of the spill becomes known, the SMPs to be activated will be confirmed as per the process set out in the SMP Operational Plan.

Scope of SMP Operations in the event of a hydrocarbon spill

Receptor locations of interest for the SMP during the response phase are:

- Gascoyne AMP

The SMP approach in the response phase would still deploy SMP teams to maximise the opportunity to collect pre-emptive baseline data at sensitive receptor locations, not immediately contacted by hydrocarbons. As the exact locations where hydrocarbon contact occurs may be unpredictable, SM01 would be mobilised as a priority to be able to detect hydrocarbons and track the leading edge of the spill to verify where hydrocarbon contact occurs which will assist with where SMP resources are a priority need to obtain pre-emptive baseline data.

The ALARP assessment for the SMP (Section 6.5) considers alternate, additional, and/or improved control measures on each selected response technique.

^[1] <https://biocollect.ala.org.au/imsa#max%3D20%26sort%3DdateCreatedSort>

5.5.5 Environmental performance based on need

Table 5-9: Scientific monitoring

Environmental Performance Outcome		Woodside can demonstrate preparedness to stand up the SMP to quantitatively assess and report on the extent, severity, persistence and recovery of sensitive receptors impacted from the spill event	
Control measure		Performance Standard	Measurement Criteria
12	<ul style="list-style-type: none"> Woodside has an established and dedicated SMP team comprising the Environmental Science Team and additional Environment Advisers within the HSE Function. 	12.1 SMP team comprises a pool of competent Environment Advisers (stand up personnel) who receive training regarding the SMP, SMP activation and implementation of the SMP on an annual basis	<ul style="list-style-type: none"> Training materials Training attendance registers Process that maps minimum qualification and experience with key SMP role competency and a tracker to manage availability of competent people for the SMP team including redundancy and rostering
13	<ul style="list-style-type: none"> Woodside has contracted SMP service provider to provide scientific personnel to resource a base capability of one team per SMP (SM01-SM10, see ANNEX C Table C-2) as detailed in Woodside's SMP standby contractor Implementation Plan, to implement the oil spill scientific monitoring programs. The availability of relevant personnel is reported to Woodside on a monthly basis via a simple report on the base-loading availability of people for each of the SMPs comprising field work for data collection (SMP resourcing report register). In the event of a spill and the SMP is activated, the base-loading availability of scientific personnel will be provided by SMP standby contractor for the individual SMPs and where gaps in resources are identified, SMP standby contractor/Woodside will seek additional personnel (if needed) from other sources including Woodside's Environmental Services Panel. 	13.1 Woodside maintains the capability to mobilise personnel required to conduct scientific monitoring programs SM01 – SM10 (except desktop based SM08): <ul style="list-style-type: none"> Personnel are sourced through the existing standby contract with SMP standby contractor, as detailed within the SMP Implementation Plan. Scientific Monitoring Program Implementation Plan describes the process for standing up and implementing the scientific monitoring programs. SMP team stand up personnel receive training regarding the stand up, activation and implementation of the SMP on an annual basis 	<ul style="list-style-type: none"> OSPU Internal Control Environment tracks the quarterly review of the Oil Spill Contracts Master. SMP resource report of personnel availability provided by SMP contractor on monthly basis (SMP resourcing report register). Training materials Training attendance registers Competency criteria for SMP roles SMP annual arrangement testing and reporting
14	<ul style="list-style-type: none"> Roles and responsibilities for SMP implementation are captured in Table C-1 (ANNEX C) and the SMP team (as per the organisational structure of the CIMT) is outlined in SMP Operational Plan. Woodside has a defined Crisis and Incident Management structure including Source Control, Operations, Planning and Logistics functions to manage a loss of well containment response. SMP Team structure, interface with SMP standby contractor and linkage to the CIMT is presented in Figure C-1, ANNEX C. Woodside has a defined Command, Control and Coordination structure for Incident and Emergency Management that is based on the AIIMS framework utilised in Australia. Woodside utilises an online Incident Management System (IMS) to coordinate and track key incident management functions. This includes specialist modelling programs, geographic information systems (GIS), as well as communication flows within the Command, Control and Coordination structure. SMP activated via the FSP. Step by step process to activation of individual SMPs provided in the SMP Operational Plan. All decisions made regarding SMP logged in the online IMS (SMP team members trained in using Woodside's online Incident Management System). SMP component input to the CIMT IAP as per the identified CIMT timed sessions and the SMP IAP logged on the online IMS. Woodside Environmental Science Team provides awareness training on the activation and stand-up of the Scientific Monitoring Programme (SMP) for the Environment Advisers in Woodside who are listed on the SMP team on an annual basis. Woodside Environmental Science Team provides awareness training on the activation and stand-up of the Scientific Monitoring Program (SMP) for the SMP Standby provider. Woodside Environmental Science Team co-ordinates an annual SMP arrangement testing exercise performed by the SMP standby contractor, SMP standby contractor and the SMP arrangements (people and equipment availability) tested annually since 2016. 	14.1 <ul style="list-style-type: none"> Woodside have established an SMP organisational structure and processes to stand up and deliver the SMP. 	<ul style="list-style-type: none"> SMP Oil Spill Scientific Monitoring Operational Plan SMP Implementation Plan SMP annual arrangement testing and reporting

15	<ul style="list-style-type: none"> Chartered and mutual aid vessels. Suitable vessels would be secured from the Woodside support vessels, regional fleet of vessels operated by Woodside and other operators and the regional charter market. Vessel suitability will be guided by the need to be equipped to operate grab samplers, drop camera systems and water sampling equipment (the individual vessel requirements are outlined in the relevant SMP methodologies (refer to Table C-2, ANNEX C). Nearshore mainland waters could use the same approach as for open water. Smaller vessels may be used where available and appropriate. Suitable vehicles and machinery for onshore access to nearshore SMP locations would be provided by Woodside's transport services contract and sourced from the wider market. Dedicated survey equipment requirements for scientific monitoring range from remote towed video and drop camera systems to capture seabed images of benthic communities to intertidal/onshore surveying tools such as quadrats, theodolites and spades/trowels, cameras and binoculars (specific survey equipment requirements are outlined in the relevant SMP methodologies (refer to Table C-2, ANNEX C)). Equipment would be sourced through the existing SMP standby contract with Standby SMP contractor for SMP resources and if additional surge capacity is required this would be available through the other Woodside Environmental Services Panel Contractors and specialist contractors. Standby SMP contractor can also address equipment redundancy through either individual or multiple suppliers. MoUs are in place with marine sampling equipment suppliers and analytical laboratories (SMP resourcing report register). Availability of SMP equipment for offshore/onshore scientific monitoring team mobilisation is within one week to ten days of the commencement of a hydrocarbon release. This meets the SMP mobilisation lead time that will support meeting the response objective of 'acquire, where practicable, the environmental baseline data prior to hydrocarbon contact required to support the post-response SMP. 	15.1	<p>Woodside maintains standby SMP capability to mobilise equipment required to conduct scientific monitoring programs SM01 – SM10 (except desktop based SM08):</p> <ul style="list-style-type: none"> Equipment are sourced through the existing standby contract with SMP standby contractor as detailed within the SMP Implementation Plan. 	<ul style="list-style-type: none"> Hydrocarbon Spill Preparedness Team Internal Control Environment tracks the quarterly review of the Oil Spill Contracts Master. SMP standby monthly resource reports of equipment availability provided by SMP contractor (SMP resourcing report register). SMP annual arrangement testing and reporting.
16	<p>Woodside's SMP approach addresses the pre-PAP acquisition of baseline data for Pre-emptive Baseline Areas (PBAs) with ≤10 days if required following a baseline gap analysis process.</p> <p>Woodside maintains knowledge of Environmental Baseline data through:</p> <ul style="list-style-type: none"> Documentation annual reviews of the Woodside Baseline Environmental Studies Database, and specific activity baseline gap analyses. Accessing external databases such as the Department of Water and Environmental Regulation (WA) Index of Marine Surveys for Assessment (IMSA) (refer to ANNEX C: Oil Spill Scientific Monitoring Program). 	16.1	<ul style="list-style-type: none"> Annual reviews of environmental baseline data PAP specific Pre-emptive Baseline Area baseline gap analysis 	<ul style="list-style-type: none"> Annual review/update of Woodside Baseline Environmental Studies Database. Desktop review to assess the environmental baseline study gaps completed prior to EP submission. Accessing baseline knowledge via the SMP annual arrangement testing.

Environmental Performance Outcome		SMP plan to acquire response phase monitoring targeting pre-emptive baseline data achieved	
Control measure		Performance Standard	Measurement Criteria
17	<p>Woodside's SMP approach addresses:</p> <ul style="list-style-type: none"> Scientific data acquisition for PBAs >10 days to hydrocarbon contact and activated in the response phase and Transition into post-response SMP monitoring. 	<p>17.1 Pre-emptive Baseline Area (PBA) baseline data acquisition in the response phase</p> <p>If baseline data gaps are identified for PBAs predicted to have hydrocarbon contact in >10 days, there will be a response phase effort to collect baseline data. Priority in implementing SMPs will be given to receptors where pre-emptive baseline data can be acquired or improved.</p> <p>SMP team (within the Environment Unit of the CIMT) contribute SMP component of the CIMT Planning Function in development of the IAP.</p> <p>17.2 Post Spill contact</p> <p>For the receptors contacted by the spill in where baseline data are available, SMPs programs to assess and monitor receptor condition will be implemented post spill (i.e. after the response phase).</p>	<ul style="list-style-type: none"> Response SMP plan Woodside's online Incident Management System Records SMP component of the Incident Action Plan (IAPs). SMP planning document SMP Decision Log Incident Action Plans (IAPs)

Environmental Performance Outcome		Implementation of the SMP (response and post-response phases)	
Control measure		Performance Standard	Measurement Criteria
18	<ul style="list-style-type: none"> Scientific monitoring will address quantitative assessment of environmental impacts of a level two or three spill or any release event with the potential to contact sensitive environmental receptors. The SMP comprises ten targeted environmental monitoring programs. SMP supporting documentation: (1) Oil Spill Scientific Monitoring Operational Plan; (2) SMP Implementation Plan and (3) SMP Process and Methodologies Guideline. The Oil Spill Scientific Monitoring Operational Plan details the process of SMP selection, input to the Incident Action Plan (IAP) to trigger operational logistic support services. Methodology documents for each of the ten SMPs 	<p>18.1 Implementation of SM01</p> <p>SM01 will be implemented to assess the presence, quantity and character of hydrocarbons in marine waters during the spill event in nearshore areas</p>	<p>Evidence SM01 has been triggered:</p> <ul style="list-style-type: none"> Documentation as per requirements of the SMP Operational Plan Woodside's online Incident Management System Records. SMP component of the IAP SMP data records from field

	<p>are accessible detailing equipment, data collection techniques and the specifications required for the survey platform support.</p> <ul style="list-style-type: none"> The SMP standby contractor holds a Woodside SMP implementation plan detailing activation processes, linkage with the Woodside SMP team and the general principles for the planning and mobilisation of SMPs to deliver the individual SMPs activated. Monthly resourcing report are issued by the SMP standby contractor (SMP resourcing report register). All SMP documents and their status are tracked via SMP document register. 	18.2	<p>Implementation of SM02-SM10</p> <p>SM02-SM10 will be implemented in accordance with the objectives and activation triggers as per Table C-2 of Annex C.</p>	<p>Evidence SMPs have been triggered:</p> <ul style="list-style-type: none"> Documentation as per requirements of the SMP Operational Plan Woodside's online Incident Management System Records. SMP component of the IAP SMP Data records from field
		18.3	<p>Termination of SMP plans</p> <p>The Scientific Monitoring Program will be terminated in accordance with termination triggers for the SMP's detailed in Table C-2 of Annex C, and the Termination Criteria Decision-tree for Oil Spill Environmental Monitoring (Figure C-3 of Annex C):</p>	<p>Evidence of Termination Criteria triggered:</p> <ul style="list-style-type: none"> Documentation and approval by relevant persons/ organisations to end SMPs for specific receptor types.

5.6 Incident Management System

The Incident Management System (IMS) is both a control measure and a measurement criteria. As a control measure the IMS function is to prompt, facilitate and record the completion of three key response planning processes detailed below. As a measurement criteria, the IMS records the evidence of the timeliness of all response actions included in the environmental performance standards and the plans used of the PAP.

As the IMS does not directly remove hydrocarbons spilt into the marine environment there is no direct relationship to the response planning need.

5.6.1 Incident action planning

The CIMT will be required to collect and interpret information from the scene of the incident to determine support requirements to the site-based IMT, develop an incident action plan (IAP) and assist the IMT with the execution of that plan. The site-based IC may request the CIMT to complete notifications internally within Woodside, to persons/ organisations and government agencies as required. Depending on the type and scale of the incident either the CIMT DM or IC will be responsible for ensuring the development of the IAP. Incident Action Planning is an ongoing process that involves continual review to ensure techniques to control the incident are appropriate to the situation at the time.

5.6.2 Operational NEBA process

In the event of a response Woodside will confirm that the response techniques adopted at the time of Environment Plan/Oil Pollution Emergency Plan (EP/OPEP) acceptance remain appropriate to reduce the consequences of the spill. This process verifies that there is a continuing net environmental benefit associated with continuing the response technique through the operational NEBA process. This process manages the environmental risks and impacts of response techniques during the spill response, an operational NEBA will be undertaken throughout the response, for each operational period.

The operational NEBA will consider the risks and benefits of conducting and response activity. For example, if vessels are required for access to nearshore or onshore areas, anchoring locations will be selected to minimise disturbance to benthic habitats. Vessel cleanliness would be commensurate with the receiving environment. The operational NEBA will consider the risks and benefits of conducting other response techniques.

The operational NEBA process is also used to terminate a response. Using data from operational and scientific monitoring activities the response to a hydrocarbon spill will be terminated in accordance with the termination process outlined in the Oil Pollution Emergency Arrangements (Australia). In effect the operational NEBA will determine whether there is net environmental benefit to continue response operations.

5.6.3 Consultation engagement process

Woodside will ensure persons/ organisations are engaged during the spill response in accordance with internal standards as outlined in **Table 5-10**. This process requires that Woodside will:

- Undertake all required notifications (including government notifications) for persons/ organisations in the region (identified in the First-Strike Response Plan). This includes notification to mariners to communicate navigational hazards introduced through response equipment and personnel.
- In the event of a response, identify and engage with relevant persons/ organisations and continually assess and review.

5.6.4 Environmental performance based on need

Table 5-10: Environmental Performance – Incident Management System

Environmental Performance Outcome		To support the effectiveness of all other control measures and monitor/record the performance levels achieved.	
Control measure		Performance Standard	Measurement Criteria
19	Operational NEBA	19.1	Confirm that the response techniques adopted at the time of acceptance remain appropriate to reduce the consequences of the spill within 24 hours.
		19.2	Record the evidence and justification for any deviation from the planned response activities.
		19.3	Record the information and data from operational and scientific monitoring activities used to inform the NEBA.
20	Stakeholder engagement	20.1	Prompt and record all notifications (including government notifications) for persons/ organisations in the region are made
		20.2	In the event of a response, identification of relevant persons/ organisations will be re-assessed throughout the response period.
		20.3	Undertake communications in accordance with: <ul style="list-style-type: none"> Woodside Crisis Management Functional Support Team Guideline – Reputation External Communication and Continuous Disclosure Procedure External Stakeholder Engagement Procedure
21	Personnel required to support any response	21.1	Action planning is an ongoing process that involves continual review to ensure techniques to control the incident are appropriate to the situation at the time.
		21.2	A duty roster of trained and competent people will be maintained to ensure that minimum manning requirements are met all year round.
		21.3	Immediately activate the IMT with personnel filling one or more of the following roles: <ul style="list-style-type: none"> Operations Duty Manager D&C Duty Manager Operations Coordinator Deputy Operations Coordinator Planning Coordinator Logistics (materials, aviation, marine and support positions) Management Support Health and Safety Advisor Environment duty Manager People Coordinator Public Information Coordinator Intelligence Coordinator Finance Coordinator.
		21.4	Collect and interpret information from the scene of the incident to determine support requirements to the site-based IMT, develop an Incident Action Plan (IAP) and assist with the execution of that plan.
		21.5	S&EM advisors will be integrated into CIMT to monitor performance of all functional roles.
		21.6	Continually communicate the status of the spill and support Woodside to determine the most appropriate response by delivering on the responsibilities of their role.
		21.7	Follow the OPEA, Operational Plans, FSPs, support plans and the IAPs developed.
		21.8	Contribute to Woodside's response in accordance with the aims and objectives set by the Duty Manager.

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5.7 Measurement criteria for all response techniques

Woodside ensures compliance with environmental performance outcomes and standards through four primary mechanisms. The aforementioned performance tables identify which of these four mechanisms monitors the readiness and records the effectiveness and performance of the control measures adopted.

1. The Incident Management System

The Incident Management System (IMS) supports the implementation of the Emergency and Crisis Management Procedure. The IMS provides a near real-time, single source of information for monitoring and recording an incident and measuring the performance of those control measures.

The Emergency and Crisis Management Procedure defines the management framework, including roles and responsibilities, to be applied to any size incident (including hydrocarbon spills). The organisational structure required to manage an incident is developed in a modular fashion and is based on the specific requirements of each incident. The structure can be scaled up or down.

The Incident Action Plan (IAP) process formally documents and communicated the:

- Incident objectives
- Status of assets
- Operational period objectives
- Response techniques (defined during response planning)
- The effectiveness of response techniques.

The information captured in the IMS (including information from personal logs and assigned tasks/close outs) confirms the response techniques implemented remain appropriate to reduce the consequences of the spill. The system also records all information and data that can be used to support the site-based IMT, development and the execution of the IAP.

2. The S&EM Competency Dashboard

The S&EM competency dashboard records the number of trained and competent responders that are available across Woodside, and some external providers, to participate in a response.

This number varies dependent on expiry of competency certificates, staff attrition, internal rotations, leave and other absences. As such the Dashboard is designed to identify the minimum manning requirements and to identify sufficient redundancy to cater for the variances listed above.

Figure 5-2 shows the minimum manning numbers for the different hydrocarbon spill response roles and the number of qualified persons against those roles.

Woodside's pool of trained responders is composed of but not limited to personnel from the following organisations:

- Woodside internal
- Australian Marine Oil Spill Centre (AMOSC) core group
- AMOSC
- Oil Spill Response Limited (OSRL)
- Marine Spill Response Corporation (MSRC)
- AMSA
- Woodside contracted workforce



Figure 5-2: Example screen shot of the HSP competency dashboard

The Dashboard is one of Woodside’s key means of monitoring its readiness to respond. It also shows that Woodside can meet the requirements of the environmental performance standard that relate to filling certain response roles.

Figure 5-3 shows deeper dive into the Ops Point Coordinator role and the training modules required to show competence.



Figure 5-3: Example screen shot for the Ops Point Coordinator role

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3. The Hydrocarbon Spill Preparedness ICE Assurance Process

The Hydrocarbon Spill Response Team has developed a Hydrocarbon Spill Preparedness and Response Internal Control Environment (ICE) process to align and feed into the Woodside Management System Assurance process for hydrocarbon spill. The process tracks compliance over four key control areas:

- a) **Plans** – Ensures all plans (including: Oil Pollution Emergency Arrangements, first strike response plans, operational plans, support plans and tactical response plans) are current and in line with regulatory and internal requirements.
- b) **Competency** – Ensures the competency dashboard is up to date and there are the minimum competency numbers across CIMT, CMT and hydrocarbon spill response roles. The hydrocarbon spill training plan and exercise schedule, including testing of arrangements is also tracked. The Testing of Arrangements (TOA) register tracks the testing of all hydrocarbon spill response arrangements, key contracts and agreements in place with internal and external parties to ensure compliance.
- c) **Capability** – Tracks and monitors capability that could be required in a hydrocarbon incident, including but not limited to: integrated fleet⁹ vessel schedule, dispersant availability, rig/vessels monitoring, equipment stockpiles, tracking buoy locations and the CIMT duty roster.
- d) **Compliance and Assurance** – Ensures all regulator inspection outcomes are actioned and closed out, the global legislation register is up to date and that the key assurance components are tracked and managed. Assurance activities (including Audits) conducted on memberships with key Oil Spill Response Organisations (OSROs) including AMOSC and OSRL are also tracked and recorded in the ICE.

The ICE assurance process records how each commitment listed in the performance tables above is managed to ensure ongoing compliance monitoring. The level of compliance can be reviewed in real time and is reported on a monthly basis through the S&EM Function.

The completion of the assurance checks (over and above the ICE process) is also applied via the Woodside Integrated Risk and Compliance System (WiRCs) and subject to the requirements of Woodside's Provide Assurance Procedure.

4. The Hydrocarbon Spill Preparedness and Response Procedure

This procedure sets out how to plan and prepare for a liquid hydrocarbon spill to the marine environment. (Note, this procedure does not apply to scenarios relating to gas releases in the marine environment).

This procedure details the:

- Requirement for an Oil Pollution Emergency Plan (OPEP) to be developed, maintained, reviewed, and approved by appropriate regulators (where applicable) including:
 - Defining how spill scenarios are developed on an activity specific basis
 - Developing and maintaining all hydrocarbon spill related plans
 - Ensuring the ongoing maintenance of training and competency for personnel
 - Developing the testing of spill response arrangements
 - Maintaining access to identified equipment and personnel.
- Planning for hydrocarbon spill response preparedness
- Accountabilities for hydrocarbon spill response preparedness
- Spill training requirements
- Requirements for spill exercising / testing of spill response arrangements
- Spill equipment and services requirements.

⁹ The Integrated fleet consists of vessels from multiple operators that have been contracted to Woodside to undertake a number of duties including hydrocarbon spill response.

The procedure also details the roles and responsibilities of the dedicated Woodside Hydrocarbon Spill Preparedness team. This team is responsible for:

- Assuring that Woodside hydrocarbon spill responders meet competency requirements.
- Establishing the competency requirements, annual training schedule and a training register of trained personnel.
- Establishing and maintaining the total numbers of trained personnel required to provide an effective response to any hydrocarbon spill incident.
- Ensuring equipment and services contracts are maintained
- Establishing OPEPs
- Establishing OPEAs
- Priority response receptor determination
- ALARP determination
- Ensuring compliance and assurance is undertaken in accordance with external and internal requirements.

6 ALARP EVALUATION

This section should be read in conjunction with Section 5 which is the capability planned for this activity.

6.1 Monitor and evaluate – ALARP assessment

Alternative, Additional and improved options have been identified and assessed against the base capability described in Section 5 with those that have been selected for implementation highlighted in green. Items highlighted in red have been considered and rejected on the basis that they are not feasible, the costs are clearly disproportionate to the environmental benefit, and/or the option is not reasonably practical. Control measures where there is not a clear justification for their inclusion or exclusion may be subject to a detailed ALARP assessment.

6.1.1 Monitor and evaluate – control measure options analysis

Woodside's existing level of capability is based on internal and third-party resources that are available 24 hours, 7 days per week. The capability presented below is displayed as ranges to incorporate operational factors such as weather, crew/vessel/aircraft/vehicle location and duties, survey or classification society inspection requirements, overflight/port/quarantine permits and inspections, crew/pilot duty and fatigue hours, re-fuelling/re-stocking provisions, and other similar logistic and operational limitation that are beyond Woodside's direct control.

6.1.1.1 Alternative control measures

Alternative Control Measures considered <i>Alternative, including potentially more effective and/or novel control measures are evaluated as replacements for an adopted control</i>		Assessment conclusions		Implemented
Option considered	Environmental consideration	Feasibility	Approx. Cost	
Aerostat (or similar inflatable observation platform) for localised aerial surveillance.	Lead time to Aerostat surveillance is disproportionate to the environmental benefit. The system also provides a very limited field of visibility around the vessel it is deployed from.	Long lead time to access (>10 days). Each system would require an operator to interpret data and direct vessels accordingly.	Purchase cost per system approx. A\$300,000.	No
Alternate analysis technologies and methods such as gravimetric, colorimetric, infra-red and UV absorption for OMD3.	Due to time, limitations on sampling, equipment, methodology and analysis, the technique does not provide an environmental benefit compared to alternative available technologies.	<ul style="list-style-type: none"> Gravimetric (Involves lab analysis so cannot be done on location, maybe completed with field samples in laboratory). Colorimetric (requires chemical addition and catalysts no standard method, needs specialist training). Infra-red (droplet size too small for infra-red analysis). Hydrocarbons need to be extracted from water for test, therefore requires a laboratory test), and UV absorption (Similar technology to fluorometers which are more widely available in Australia) were evaluated but all have limitations that do not improve the environmental benefit. 	NA	No

6.1.1.2 Additional control measures

Additional Control Measures considered <i>Additional control measures are evaluated in terms of them reducing an environmental impact or an environmental risk when added to the existing suite of control measures</i>		Assessment Conclusions		Implemented
Option considered	Environmental consideration	Feasibility	Approx. Cost	
Additional personnel trained to use systems for OMD1.	Current arrangement provides an environmental benefit in the availability of trained personnel facilitating access to monitoring data used to inform all other response techniques. No improvement required.	No improvement can be made, all personnel in technical roles e.g. intelligence unit are trained and competent on the software systems. Personnel are trained and exercised regularly. Use of the software and systems forms part of regular work assignments and projects.	Cost for training in-house staff would be approx. A\$25,000.	No
Additional satellite tracking buoys to enable greater area coverage.	Increased capability does not provide an environmental benefit compared to the disproportionate cost in having an additional contract in place.	Tracking buoy will be on vessel, additional needs are met from Woodside owned stocks in King Bay Supply Facility (KBSF) and Exmouth or can be provided by service provider in a timely manner.	Cost for an additional satellite tracking buoy would be A\$200 per day or A\$6,000 to purchase.	No
Additional trained aerial observers.	Current capability meets need. WEL has access to a pool of trained, competent observers at strategic locations to ensure timely and sustainable response. Additional observers are available through current contracts with AMOSC and OSRL. Aviation standards and guidelines ensure all aircraft crews are competent for their roles. WEL maintains a pool of trained and competent aerial observers with various home base locations to be called upon at the time of an incident. Regular audits of oil spill response organisations ensure training and competency is maintained.	Current capability meets need. WEL has a pool of trained, competent observers at strategic locations to ensure timely and sustainable response. Additional observers are available through current contracts with AMOSC and OSRL. Aviation standards and guidelines ensure all aircraft crews are competent for their roles. WEL maintains a pool of trained and competent aerial observers with various home base locations to be called upon at the time of an incident. Regular audits of oil spill response organisations ensure training and competency is maintained.	Cost for additional trained aerial observers would be A\$2,000 per person per day.	No

6.1.1.3 Improved control measures

Improved Control Measures considered <i>Improved control measures are evaluated for improvements they could bring to the effectiveness of adopted control measures in terms of functionality, availability, reliability, survivability, independence and compatibility</i>		Assessment conclusions	
Option considered	Environmental consideration	Feasibility	Approx. Cost
Faster turnaround time from modelling contractor.	Improved control measure does not provide an environmental benefit compared to the disproportionate cost in having an additional contract in place.	External contractor on CIMT roster to be called as soon as required. However initial information needs to be gathered by CIMT team to request an accurate model. External contractor has person on call to respond from their own location.	Modelling service with a faster activation time would be achieved via membership of an alternative modelling service at an annual cost of A\$50,000 for 24-hour access plus an initial A\$5,000 per modelling run.
Night-time aerial surveillance.	The risk of undertaking the aerial observations at night is disproportionate to the limited environmental benefit. The images would be of low quality and no visual cross reference verification is possible and as such the variable is not adopted.	Flights will only occur when deemed safe by the pilot. The risk of night operations is disproportionate to the benefit gained, as images from sensors (IR, UV, etc.), will be low quality. Flight time limitations will be adhered to.	No improvement can be made without risk to personnel health and safety and breaching Woodside's golden rules.
Faster mobilisation time (for water quality monitoring).	Due to the restriction on accessing the spill location on day 1 there is no environmental benefit in having vessels available from day 1. The cost of having dedicated equipment and personnel is disproportionate to the environmental benefit. The availability of vessels and personnel meets the response need.	Operations are not feasible on day 1 as volatility has potential to cause health and safety concerns within the first 24 hours of the response. Current Woodside arrangements allow for water quality monitoring to commence by day 3. Shortening the timeframes for vessel availability would require dedicated response vessels on standby in Darwin and would accelerate the initiation of monitoring by 1 day.	Cost for purchase of equipment approx. A\$200,000. Ongoing costs per annum for cost of hire and pre-positioning for life of asset/activity would be larger than the purchase cost. Dedicated equipment and personnel, living locally and on short notice to mobilise. The cost would be approx. A\$1 million per annum, which is disproportionate to the incremental benefit this would provide, assets are already available on day 1. 2 integrated fleet vessels are available from day 1; however, these could be tasked with other operations.

6.1.2 Selected control measures

Following review of alternative, additional and improved control measures as outlined above, the following controls were selected for implementation for the activity.

- Alternative
 - None selected
- Additional
 - None selected
- Improved
 - None selected

6.2 Source Control via Vessel SOPEP – ALARP Assessment

Alternative, Additional and Improved options have been assessed against the base capability described in Section 5 with those that have been selected for implementation highlighted in green. Items highlighted in red have been considered and rejected on the basis that they are not feasible, the costs are disproportionate to the environmental benefit, and/or the option is not reasonably practical. Control measures where there is not a clear justification for their inclusion or exclusion may be subject to a detailed ALARP assessment.

6.2.1 Source Control via Vessel SOPEP – Control Measure Options Analysis

6.2.1.1 Alternative control measures

Alternative Control Measures considered <i>Alternative, including potentially more effective and/or novel control measures are evaluated as replacements for an adopted control</i>	Feasibility	Approx. Cost	Implemented
Option considered Environmental consideration	No reasonably practical alternative control measures identified.		N/A

6.2.1.2 Additional Control Measures

Additional Control Measures considered <i>Additional control measures are evaluated in terms of them reducing an environmental impact or an environmental risk when added to the existing suite of control measures</i>	Feasibility	Approx. Cost	Implemented
Option considered Environmental consideration	No reasonably practical alternative control measures identified.		N/A

6.2.1.3 Improved Control Measures

Improved Control Measures considered <i>Improved control measures are evaluated for improvements they could bring to the effectiveness of adopted control measures in terms of functionality, availability, reliability, survivability, independence and compatibility</i>	Feasibility	Approx. Cost	Implemented
Option considered Environmental consideration	No reasonably practical alternative control measures identified.		N/A

6.2.1.4 Selected control measures

Following review of alternative, additional and improved control measures, the following controls were selected for implementation for the activity.

- Alternative
 - None selected
- Additional
 - None selected
- Improved
 - None selected

6.3 Oiled wildlife response – ALARP assessment

Alternative, Additional and improved options have been identified and assessed against the base capability described in Section 5 with those that have been selected for implementation highlighted in green. Items highlighted in red have been considered and rejected on the basis that they are not feasible, the costs are clearly disproportionate to the environmental benefit, and/or the option is not reasonably practical. Control measures where there is not a clear justification for their inclusion or exclusion may be subject to a detailed ALARP assessment.

6.3.1 Existing capability – wildlife response

Woodside's existing level of capability is based on internal and third-party resources that are available 24 hours, 7 days per week. The capability presented below is displayed as ranges to incorporate operational factors such as weather, crew/vessel/aircraft/vehicle location and duties, survey or classification society inspection requirements, overflight/port/quarantine permits and inspections, crew/pilot duty and fatigue hours, re-fuelling/re-stocking provisions, and other similar logistic and operational limitation that are beyond Woodside's direct control.

6.3.2 Wildlife response – control measure options analysis

6.3.2.1 Alternative control measures

*Alternative Control Measures considered
Alternative, including potentially more effective and/or novel control measures are evaluated as replacements for an adopted control*

Option considered	Environmental consideration	Feasibility	Approximate Cost	Assessment conclusions	Implemented
Direct contracts with service providers	This option duplicates the capability accessed through AMOSC and OSRL and would compete for the same resources. Does not provide a significant increase in environmental benefit.	These delivery options provide increased effectiveness through more direct communication and control of specialists. However, no significant net benefit is anticipated.	Duplication of capability - already subscribed to through contracts with AMOSC and OSRL	This option is not adopted as the existing capability meets the need.	No

6.3.2.2 Additional control measures

*Additional Control Measures considered
Additional control measures are evaluated in terms of them reducing an environmental impact or an environmental risk when added to the existing suite of control measures*

Option considered	Environmental consideration	Feasibility	Approximate Cost	Assessment conclusions	Implemented
Additional wildlife treatment systems	The selected delivery options provide access to call-off contracts with selected specialist providers. The agreements ensure these resources can be mobilised to meet the required response objectives, commensurate with the progressive nature of environmental impact and the time available to monitor hydrocarbon plume trajectories. Provides response equipment and personnel by Day 3. The additional cost in having a dedicated oiled wildlife response (equipment and personnel) in place is disproportionate to environmental benefit. These selected delivery options provide capacity to carry out an oiled wildlife response if contact is predicted and to scale up the response if required to treat widespread contamination. Current capability meets the needs required and there is no additional environmental benefit in adopting the improvements. Current numbers meet the needs required and additional personnel are available through existing contracts with oil spill response organisations and environmental panel contractors. Numbers of oiled wildlife are expected to be low in the remote offshore setting of the oiled wildlife response, given the distance from known aggregation areas. The potential environmental benefit of training additional personnel is expected to be low.	Although hydrocarbon contact above threshold concentrations with offshore waters is expected from day one, given the low likelihood of such an event occurring and the low environmental benefit of an offshore response, the cost of implementing measures to reduce the mobilisation time is considered disproportionate to the benefit. Additionally, the remote offshore location of the release site with no predicted contact of shoreline receptors provides sufficient opportunity for the ongoing monitoring and surveillance operations to inform the scale of the response. Numbers of oiled wildlife are expected to be low in the remote offshore setting of the oiled wildlife response, given the distance from known aggregation areas. Oiled wildlife response capacity would be addressed for open Commonwealth waters through the AMOSC arrangements, as informed by operational monitoring. The cost and organisational complexity of this approach is moderate, and the overall delivery effectiveness is high.	Additional wildlife response resources could total A\$1,700 per operational site per day.	This option is not adopted as the existing capability meets the need.	No
Additional trained wildlife responders	The selected delivery options provide access to call-off contracts with selected specialist providers. The agreements ensure these resources can be mobilised to meet the required response objectives, commensurate with the progressive nature of environmental impact and the time available to monitor hydrocarbon plume trajectories. Provides response equipment and personnel by Day 3. The additional cost in having a dedicated oiled wildlife response (equipment and personnel) in place is disproportionate to environmental benefit. These selected delivery options provide capacity to carry out an oiled wildlife response if contact is predicted and to scale up the response if required to treat widespread contamination. Current capability meets the needs required and there is no additional environmental benefit in adopting the improvements. Current numbers meet the needs required and additional personnel are available through existing contracts with oil spill response organisations and environmental panel contractors. Numbers of oiled wildlife are expected to be low in the remote offshore setting of the oiled wildlife response, given the distance from known aggregation areas. The potential environmental benefit of training additional personnel is expected to be low.	Although hydrocarbon contact above threshold concentrations with offshore waters is expected from day one, given the low likelihood of such an event occurring and the low environmental benefit of an offshore response, the cost of implementing measures to reduce the mobilisation time is considered disproportionate to the benefit. Additionally, the remote offshore location of the release site with no predicted contact of shoreline receptors provides sufficient opportunity for the ongoing monitoring and surveillance operations to inform the scale of the response. Numbers of oiled wildlife are expected to be low in the remote offshore setting of the oiled wildlife response, given the distance from known aggregation areas. Oiled wildlife response capacity would be addressed for open Commonwealth waters through the AMOSC arrangements, as informed by operational monitoring. The cost and organisational complexity of this approach is moderate, and the overall delivery effectiveness is high.	Additional wildlife response resources could total A\$2,000 per person per day.	This option is not adopted as the existing capability meets the need.	No

6.3.2.3 Improved control measures

Improved Control Measures considered

Improved control measures are evaluated for improvements they could bring to the effectiveness of adopted control measures in terms of functionality, availability, reliability, survivability, independence and compatibility

Option considered	Environmental consideration	Feasibility	Approximate Cost	Assessment conclusions	Implemented
Faster mobilisation time for wildlife response.	Response time is limited by specialist personnel mobilisation time. Current timing is sufficient for expected first shoreline impact. This control measure provides increased effectiveness through faster mobilisation of specialists. However, no significant net environmental benefit is expected due to shoreline stranding times. The cost of having dedicated equipment and personnel available to respond faster is considered grossly disproportionate to the environmental benefit.	Pre-positioning vessels or equipment would reduce mobilisation time for oiled wildlife response activities. However, given the effectiveness of an oiled wildlife response is expected to be generally low, an earlier response would provide a marginal increase in environmental benefit. The selected delivery options provide the capacity to mobilise an oiled wildlife response capable of treating up to 600 wildlife from at least Day 6 and exceeds the maximum estimated Level three OWR response thought to be applicable. This delivery option provides the maximum expertise pooled across the participating operators, backed up by the international resources provided by OSRL. The availability of vessels and personnel meets the response need.	Wildlife response packages to preposition at vulnerable sites identified through the deterministic modelling cost A\$700 per package per day.	This option is not adopted as the existing capability meets the need.	No

6.3.3 Selected control measures

Following review of alternative, additional and improved control measures, the following controls were selected for implementation for the activity.

- Alternative
 - None selected
- Additional
 - None selected
- Improved
 - None selected

6.4 Waste management – ALARP assessment

Alternative, Additional and Improved options have been identified and assessed against the base capability described in Section 5 with those that have been selected for implementation highlighted in green. Items highlighted in red have been considered and rejected on the basis that they are not feasible, the costs are clearly disproportionate to the environmental benefit, and/or the option is not reasonably practical. Control measures where there is not a clear justification for their inclusion or exclusion may be subject to a detailed ALARP assessment.

6.4.1 Existing capability – waste management

Woodside's existing level of capability is based on internal and third-party resources that are available 24 hours, 7 days per week. The capability presented below is displayed as ranges to incorporate operational factors such as weather, crew/vessel/aircraft/vehicle location and duties, survey or classification society inspection requirements, overflight/port/quarantine permits and inspections, crew/pilot duty and fatigue hours, re-fuelling/re-stocking provisions, and other similar logistic and operational limitation that are beyond Woodside's direct control.

6.4.2 Waste management – control measure options analysis

6.4.2.1 Alternative control measures

Alternative Control Measures considered
Alternative, including potentially more effective and/or novel control measures are evaluated as replacements for an adopted control

Option considered	Environmental consideration	Feasibility	Approximate Cost	Assessment conclusions
No reasonably practical alternative control measures identified.				Implemented

6.4.2.2 Additional control measures

Additional Control Measures considered
Additional control measures are evaluated in terms of them reducing an environmental impact or an environmental risk when added to the existing suite of control measures

Option considered	Environmental consideration	Feasibility	Approximate Cost	Assessment conclusions
Increased waste storage capability	The procurement of waste storage equipment options on the day of the event will allow immediate response and storage of collected waste. The environmental benefit of immediate waste storage is to reduce ecological consequence by safely securing waste, allowing continuous response operations to occur.	Access to Veolia's storage options provides the resources required to store and transport sufficient waste to meet the need. Access to waste contractors existing facilities enables waste to be stockpiled and gradually processed within the regional waste handling facilities. Additional temporary storage equipment is available through existing third-party contracts and arrangements with OSRL. Existing arrangements meet identified need for the activity.	Cost for increased waste disposal capability would be approximately A\$1,300 per m ³ . Cost for increased onshore temporary waste storage capability would be approximately A\$40 per unit per day.	This option is not adopted as the existing capability meets the need. No

6.4.2.3 Improved control measures

Improved Control Measures considered
Improved control measures are evaluated for improvements they could bring to the effectiveness of adopted control measures in terms of functionality, availability, reliability, survivability, independence and compatibility

Option considered	Environmental consideration	Feasibility	Approximate Cost	Assessment conclusions
Faster response	The environmental benefit from successful waste storage will reduce pressure on the treatment and disposal facilities reducing ecological consequences by safely securing waste. In addition, waste storage and transport will allow continuous response operations to occur. This delivery option would increase known available storage, eliminating the risk of additional resources not being available at the time of the event. However, the environmental benefit of Woodside procuring additional waste storage is considered minor as the risk of additional storage not being available at the time of the event is considered low and existing arrangements provide adequate storage to support the response.	The credible scenario for this activity does not predict any shoreline impact and at-sea response is not appropriate for a spill of Marine Diesel thus waste storage needs will be minimal. Woodside already maintains an equipment stockpile in Exmouth to enable shorter response times to incidents. This stockpile includes temporary waste storage equipment. Woodside has access to stockpiles of waste storage and equipment in Dampier and Exmouth through existing contracts and arrangements.	The incremental benefit of having a dedicated local Woodside owned stockpile of waste equipment and transport is considered minor and cost is considered disproportionate to the benefit gained given there is no predicted shoreline impact.	This option is not adopted as the existing capability meets the need. No

6.4.3 Selected control measures

Following review of alternative, additional and improved control measures, the following controls were selected for implementation for the activity.

- Alternative
 - None selected

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- Additional
 - None selected
- Improved
 - None selected

6.5 Scientific Monitoring – ALARP Assessment

Alternative, Additional and Improved options have been identified and assessed against the base capability described in Section 5 with those that have been selected for implementation highlighted in green. Items highlighted in red have been considered and rejected on the basis that they are not feasible, the costs are clearly disproportionate to the environmental benefit, and/or the option is not reasonably practical. Control measures where there is not a clear justification for their inclusion or exclusion may be subject to a detailed ALARP assessment.

6.5.1 Existing Capability – Scientific Monitoring

Woodside's existing level of capability is based on internal and third-party resources that are available 24 hours, 7 days per week. The capability presented below is displayed as ranges to incorporate operational factors such as weather, crew/vessel/aircraft/vehicle location and duties, survey or classification society inspection requirements, overflight/port/quarantine permits and inspections, crew/pilot duty and fatigue hours, re-fuelling/re-stocking provisions, and other similar logistic and operational limitations that are beyond Woodside's direct control.

6.5.2 Scientific Monitoring – Control Measure Options Analysis

6.5.2.1 Alternative control measures

Alternative Control Measures considered <i>Alternative, including potentially more effective and/or novel control measures are evaluated as replacements for an adopted control</i>					
Ref	Control Measure Category	Option considered	Implemented	Environmental Consideration	Feasibility / Cost
SM01	System	Analytical laboratory facilities closer to the likely spill affected area	No	SM01 water quality monitoring requires water samples to be transported to National Association of Testing Authorities (NATA) rated laboratories in Perth or interstate. Consider the benefit of laboratory access and transportation times to deliver water samples and complete lab analysis. There is a time lag from collection of water samples to being in receipt of results and confirming hydrocarbon contact to sensitive receptors). The environmental consideration of having access to suitable laboratory facilities in Exmouth or Karratha to carry out the hydrocarbon analysis would provide faster turnaround in reporting of results only by a matter of days (as per the time to transport samples to laboratories).	Laboratory facilities and staff available at locations closer to the spill affected area can reduce reporting times only to a moderate degree (days) with associated high costs of maintaining capability do not improve the environmental benefit.
SM01	System	Dedicated contracted SMP vessel (exclusive to Woodside)	No	Would provide faster mobilisation time of scientific monitoring resources, environmental benefit associated with faster mobilisation time would be minor compared to selected options.	Chartering and equipping additional vessels on standby for scientific monitoring has been considered. The option is reasonably practicable but the sacrifice (charter costs and organisational complexity) is significant, particularly when compared with the anticipated availability of vessels and resources within in the required timeframes. The selected delivery provides capability to meet the scientific monitoring objectives, including collection of pre-emptive data where baseline knowledge gaps are identified for receptor locations where spill predictions of time to contact are >10 days. The effectiveness of this alternative control (weather dependency, availability and survivability) is rated as very low The cost and organisational complexity of employing a dedicated response vessel is considered disproportionate to the potential environmental benefit by adopting these delivery options.

6.5.2.2 Additional control measures

Additional Control Measures considered <i>Additional control measures are evaluated in terms of them reducing an environmental impact or an environmental risk when added to the existing suite of control measures</i>					
Ref	Control Measure Category	Option considered	Implemented	Environmental Consideration	Feasibility / Cost
SM01	System	Determine baseline data needs and provide implementation plan in the event of an unplanned hydrocarbon release	Yes	Address resourcing needs to collect post spill (pre-contact) baseline data as spill expands in the event of a loss of well containment from the PAP activities.	Woodside relies on existing environmental baseline for receptors which have predicted hydrocarbon contact (above environment threshold) <10 days and acquiring pre-emptive data in the event of a loss of well containment from the PAP activities based on receptors predicted to have hydrocarbon contact >10 days. Ensure there is appropriate baseline for key receptors for all geographic locations that are potentially impacted <10 days of spill event, where practicable. Address resourcing needs to collect pre-emptive baseline as spill expands in the event of a instantaneous marine diesel spill from the activities.

6.5.3 Improved Control Measures

Improved Control Measures considered – No reasonably practicable improved Control Measures identified.

6.5.4 Selected Control Measures

Following review of alternative, additional and improved control measures as outlined above, the following controls were selected for implementation for the PAP.

- Alternative
 - None selected
- Additional
 - Determine baseline data needs and activate SMPs for any identified PBAs in the event of an unplanned hydrocarbon release
- Improved
 - None selected

6.5.5 Operational Plan

Key actions from the Scientific Monitoring Program Operational Plan for implementing the response are outlined in **Table 6-1**.

Table 6-1: Scientific monitoring program operational plan actions

Responsibility	Action
Activation	
CIMT Planning (CIMT Planning – Environment Unit)	Mobilise SMP Lead/Manager and SMP Coordinator to the CIMT Planning function.
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager and SMP Coordinator)	Constantly assess all outputs from OM01, OM02 and OM03 (Section 5 and ANNEX B: Operational Monitoring Activation and Termination Criteria to determine receptor locations and receptors at risk. Confirm sensitive receptors likely to be exposed to hydrocarbons, timeframes to specific receptor locations and which SMPs are triggered. Review baseline data for receptors at risk.
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager and SMP Coordinator)	SMP co-ordinator stands up the SMP contractor. Stands up subject matter experts, if required.
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager SMP Coordinator, SMP standby contractor SMP manager)	Establish if, and where, pre-contact baseline data acquisition is required. Determine practicable baseline acquisition program based on predicted timescales to contact and anticipated SMP mobilisation times. Determine scope for preliminary post-contact surveys during the Response Phase. Determine which SMP activities are required at each location based on the identified receptor sensitivities.
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager, SMP Coordinator, SMP	If response phase data acquisition is required, stand up the contractor SMP teams for data acquisition and instruct them to standby awaiting further details for mobilisation from the CIMT.

Responsibility	Action
standby contractor SMP manager)	
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager, SMP Coordinator, SMP standby contractor SMP manager)	SMP contractor, SMP standby contractor to prepare the Field Implementation Plan. Prepare and obtain sign-off of the Response Phase SMP work plan and Field Implementation Plan. Update the IAP.
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager, SMP Coordinator SMP standby contractor SMP manager)	Liaise with CIMT Logistics, and determine the status and availability of aircraft, vessels and road transportation available to transport survey personnel and equipment to point of departure. Engage with SMP standby contractor SMP Manager and CIMT Logistics to establish mobilisation plan, secure logistics resources and establish ongoing logistical support operations, including: <ul style="list-style-type: none"> • Vessels, vehicles and other logistics resources • Vessel fit-out specifications (as • Detailed in the Scientific Monitoring Program Operational Plan • Equipment storage and pick-up locations • Personnel pick-up/airport departure locations • Ports of departure • Land based operational centres and forward operations bases Accommodation and food requirements.
CIMT Planning (CIMT Planning – Environment Unit) (SMP Lead/Manager, SMP Coordinator, SMP standby contractor (SMP manager)	Confirm communications procedures between Woodside SMP team, SMP contractor SMP Duty Manager, SMP Team Leads and Operations Coordinator (CIMT).
Mobilisation	
CIMT Logistics	Engage vessels and vehicles and arrange fitting out as specified by the mobilisation Plan Confirm vessel departure windows and communicate with the SMP contractor SMP Duty Manager. Agree SMP mobilisation timeline and induction procedures with the Operations Coordinator (CIMT).
CIMT Logistics	Coordinate with SMP contractor SMP Duty Manager to mobilise teams and equipment according to the logistics plan and Sector induction procedures.
SMP Survey Team Leads	SMP Survey Team Leader(s) coordinate on-ground/on-vessel mobilisations and support services with the Operations Coordinator (CIMT).

6.5.6 ALARP and Acceptability Summary

ALARP and Acceptability Summary		
Scientific Monitoring		
ALARP Summary	X	All known reasonably practicable control measures have been adopted
	X	Additional Measures: Determine baseline data needs and activate SMPs for any identified PBAs in the event of an unplanned hydrocarbon release
		No reasonably practical additional, alternative, and/or improved control measure exists
	<p>The resulting scientific monitoring capability has been assessed against the worst-case credible spill scenarios. The range of strategies provide an ongoing approach to monitoring operations to assess and evaluate the scale and extent of impacts.</p> <p>All known reasonably practicable control measures have been adopted with the cost and organisational complexity of these options determined to be Moderate and the overall delivery effectiveness considered Medium. The SMP's main objectives can be met, with the addition of one alternative control measures to provide further benefit.</p>	
Acceptability Summary	<ul style="list-style-type: none"> • The control measures selected for implementation manage the potential impacts and risks to ALARP. • In the event of a hydrocarbon spill for the PAP, the control measures selected, meet or exceed the requirements of Woodside Management System and industry best-practice. • Throughout the PAP, relevant Australian standards and codes of practice will be followed to evaluate the impacts from an unplanned hydrocarbon release. • The level of impact and risk to the environment has been considered with regard to the principles of Environmentally Sustainable Development (ESD); and risks and impacts from a range of identified scenarios were assessed in detail. The control measures described consider the conservation of biological and ecological diversity, through both the selection of control measures and the management of their performance. The control measures have been developed to account for the worst-case credible case scenario, and uncertainty has not been used as a reason for postponing control measures. 	
<p>On the basis from the ALARP impact assessment above and in Section 6 of the EP Woodside considers the adopted controls discussed, manage the impacts and risks associated with implementing scientific monitoring activities to a level that is ALARP and acceptable.</p>		

7 ENVIRONMENTAL RISK ASSESSMENT OF SELECTED RESPONSE TECHNIQUES

The implementation of response techniques may modify the impacts and risks identified in the EP and response activities can introduce additional impacts and risks from response operations themselves. Therefore, it is necessary to complete an assessment to ensure these impacts and risks have been considered and specific measures are put in place to continually review and manage these further impacts and risks to ALARP and Acceptable levels. A simplified assessment process has been used to complete this task which covers the identification, analysis, evaluation and treatment of impacts and risks introduced by responding to the event.

7.1 Identification of impacts and risks from implementing response techniques

Each of the control measures can modify the impacts and risks identified in the EP. These impacts and risks have been previously assessed within the scope of the EP. Refer to the EP for details regarding how these risks are being managed. They are not discussed further in this document.

- Atmospheric emissions
- Routine and non-routine discharges
- Physical presence, proximity to other vessels (shipping and fisheries)
- Routine acoustic emissions vessels
- Lighting for night work/navigational safety
- Invasive marine species
- Collision with marine fauna
- Disturbance to Seabed

Additional impacts and risks associated with the control measures not included within the scope of the EP include:

- Vessel operations and anchoring
- Additional stress or injury caused to wildlife
- Waste generation

7.2 Analysis of impacts and risks from implementing response techniques

The table below compares the adopted control measures for this activity against the environmental values that can be affected when they are implemented.

Table 7-1: Analysis of risks and impacts

	Environmental Value						
	Soil and Groundwater	Marine Sediment Quality	Water Quality	Air Quality	Ecosystems/Habitat	Species	Socio-Economic
Monitor and evaluate		✓	✓		✓	✓	
Source control		✓	✓	✓	✓	✓	✓
Oiled Wildlife					✓	✓	
Scientific Monitoring		✓	✓		✓	✓	✓
Waste Management	✓			✓	✓	✓	✓

7.3 Evaluation of impacts and risks from implementing response techniques

7.3.1 Vessel operations

During the implementation of response techniques, where water depths allow, it is possible that response vessels will be required to anchor (e.g. during shoreline surveys). The use of vessel anchoring will be minimal and likely to occur when the impacted shoreline is inaccessible via road. Anchoring in the nearshore environment of sensitive receptor locations will have the potential to impact coral reef, seagrass beds and other benthic communities in these areas. Recovery of benthic communities from anchor damage depends on the size of anchor and frequency of anchoring. Impacts would be highly localised (restricted to the footprint of the vessel anchor and chain) and temporary, with full recovery expected.

7.3.2 Additional stress or injury caused to wildlife

Additional stress or injury to wildlife could be caused through the following phases of a response:

- Capturing wildlife
- Transporting wildlife
- Stabilisation of wildlife
- Cleaning and rinsing of oiled wildlife
- Rehabilitation (e.g. diet, cage size, housing density)
- Release of treated wildlife

Inefficient capture techniques have the potential to cause undue stress, exhaustion or injury to wildlife, additionally pre-emptive capture could cause undue stress and impacts to wildlife when there are uncertainties in the forecast trajectory of the spill. During the transportation and stabilisation phases there is the potential for additional thermoregulation stress on captured wildlife. Additionally, during the cleaning process, it is important personnel undertaking the tasks are familiar with the relevant techniques to ensure that further injury and the removal of water proofing feathers are managed and mitigated. Finally, during the release phase it's important that wildlife is not released back into a contaminated environment.

7.3.3 Waste generation

Implementing the selected response techniques will result in the generation of the following waste streams that will require management and disposal:

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- Liquids (recovered oil/water mixture), recovered from oiled wildlife response operations
- Semi-solids/solids (oily solids), collected during oiled wildlife response operations
- Debris collected during oiled wildlife response.

If not managed and disposed of correctly, wastes generated during the response have the potential for secondary contamination, impacts to wildlife through contact with or ingestion of waste materials and contamination risks if not disposed of correctly onshore.

7.4 Treatment of impacts and risks from implementing response techniques

In respect of the impacts and risks assessed the following treatment measures have been adopted. It must be recognised that this environmental assessment is seeking to identify how to maintain the level of impact and risks at levels that are ALARP and of an acceptable level rather than exploring further impact and risk reduction. It is for this reason that the treatment measures identified in this assessment will be captured in Operational Plans, Tactical Response Plans, and/or First Strike Response Plans.

7.4.1 Vessel operations and access to the nearshore environment

- If vessels are required for access, anchoring locations will be selected to minimise disturbance to benthic habitats. Where existing fixed anchoring points are not available, locations will be selected to minimise impact to nearshore benthic environments with a preference for areas of sandy seabed where they can be identified (PS 7.1).

7.4.2 Additional stress or injury caused to wildlife

- Oiled wildlife operations (including hazing) would be implemented with advice and assistance from the Oiled Wildlife Advisor from the DBCA. (PS 9.3).

7.4.3 Waste generation

- All oiled wildlife response sites zoned and marked before operations commence to prevent secondary contamination and minimise the mixing of clean and oiled waste (PS 11.1).

8 ALARP CONCLUSION

An analysis of alternative, additional and improved control measures has been undertaken to determine their reasonableness and practicability. The tables in **Section 6** document the considerations made in this evaluation. Where the costs of an alternative, additional, or improved control measure have been determined to be clearly disproportionate to the environmental benefit gained from its adoption it has been rejected. Where this is not considered to be the case the control measure has been adopted.

The risks from a hydrocarbon spill have been reduced to ALARP because:

- Woodside has a significant hydrocarbon spill response capability to respond to the WCCS through the control measures identified.
- New and modified impacts and risks associated with implementing response techniques have been considered and will not increase the risks associated with the activity.
- A consideration of alternative, additional, and improved control measures identified any other control measures that delivered proportionate environmental benefit compared to the cost of adoption for this activity ensuring that:
 - All known, reasonably practicable control measures have been adopted.
 - No additional, reasonably practicable alternative and/or improved control measures would provide further environmental benefit.
 - No reasonably practical additional, alternative, and/or improved control measure exists.
- A structured process for considering alternative, additional, and improved control measures was completed for each control measure.
- The evaluation was undertaken based on the outputs of the WCCS so that the capability in place is sufficient for all other scenario from this activity.
- The likelihood of the WCCS spill has been ignored in evaluating what was reasonably practicable.

9 ACCEPTABILITY CONCLUSION

Following the ALARP evaluation process, Woodside deems the hydrocarbon spill risks and impacts have been reduced to an acceptable level by meeting all of the following criteria:

- Techniques are consistent with Woodside's processes and relevant internal requirements including policies, culture, processes, standards, structures and systems.
- Levels of risk/ impact are deemed acceptable by relevant persons/ organisations and are aligned with the uniqueness of, and/or the level of protection assigned to the environment, its sensitivity to pressures introduced by the activity, and the proximity of activities to sensitive receptors, and have been aligned with Part 3 of the EPBC Act.
- Selected control measures meet requirements of legislation and conventions to which Australia is a signatory (e.g. MARPOL, the World Heritage Convention, the Ramsar Convention, and the Biodiversity Convention etc.). In addition to these, other non-legislative requirements met include:
 - Australian IUCN reserve management principles for Commonwealth marine protected areas and bioregional marine plans.
 - National Water Quality Management Strategy and supporting guidelines for marine water quality).
 - Conditions of approval set under other legislation.
 - National and international requirements for managing pollution from ships.
 - National biosecurity requirements.
- Industry standards, best practices and widely adopted standards and other published materials have been used and referenced when defining acceptable levels. Where these are inconsistent with mandatory/ legislative regulations, explanation has been provided for the proposed deviation. Any deviation produces the same or a better level of environmental performance (or outcome).

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11 GLOSSARY AND ABBREVIATIONS

11.1 Glossary

Term	Description / Definition
ALARP	Demonstration through reasoned and supported arguments that there are no other practicable options that could reasonably be adopted to reduce risks further.
Availability	The availability of a control measure is the percentage of time that it is capable of performing its function (operating time plus standby time) divided by the total period (whether in service or not). In other words, it is the probability that the control has not failed or is undergoing a maintenance or repair function when it needs to be used.
Control	The means by which risk from events is eliminated or minimised.
Control effectiveness	A measure of how well the control measures perform their required function.
Control measure (risk control measure)	The features that eliminate, prevent, reduce or mitigate the risk to environment associated with PAP.
Credible spill scenario	A spill considered by Woodside as representative of maximum volume and characteristics of a spill that could occur as part of the PAP.
Dependency	The degree of reliance on other systems in order for the control measure to be able to perform its intended function.
Environment that may be affected	The summary of quantitative modelling where the marine environment could be exposed to hydrocarbons levels exceeding hydrocarbon threshold concentrations.
Incident	An event where a release of energy resulted in or had (with) the potential to cause injury, ill health, damage to the environment, damage to equipment or assets or company reputation.
Performance outcome	A statement of the overall goal or outcome to be achieved by a control measure
Performance standard	The parameters against which [risk] controls are assessed to ensure they reduce risk to ALARP. A statement of the key requirements (indicators) that the control measure has to achieve in order to perform as intended in relation to its functionality, availability, reliability, survivability and dependencies.
Preparedness	Measures taken before an incident in order to improve the effectiveness of a response
Reasonably practicable	... a computation ... made by the owner, in which the quantum of risk is placed on one scale and the sacrifice involved in the measures necessary for averting the risk (whether in money, time or trouble) [showing whether or not] that there is a gross disproportion between them ... made by the owner at a point of time anterior to the accident. (Judgement: Edwards v National Coal Board [1949])
Receptors at risk	Physical, biological and social resources identified as at risk from hydrocarbon contact using oil spill modelling predictions.
Receptor areas	Geographically referenced areas such as bays, islands, coastlines and/or protected area (WHA, Commonwealth or State marine reserve or park) containing one or more receptor type, e.g., Gascoyne AMP.
Receptor Sensitivities	This is a classification scheme to categorise receptor sensitivity to an oil spill. The Environmental Sensitivity Index (ESI) is a numerical classification of the relative sensitivity of a particular environment (particularly different shoreline types) to an oil spill. Refer to the Woodside Oil Pollution Emergency Arrangements (Australia) for more details.
Regulator	NOPSEMA are the Environment Regulator under the Environment Regulations.
Reliability	The probability that at any point in time a control measure will operate correctly for a further specified length of time.

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Term	Description / Definition
Response technique	The key priorities and objectives to be achieved by the response plan. Measures taken in response to an event to reduce or prevent adverse consequences.
Survivability	Whether or not a control measure is able to survive a potentially damaging event is relevant for all control measures that are required to function after an incident has occurred.
Threshold	Hydrocarbon threshold concentrations applied to the risk assessment to evaluate hydrocarbon spills. These are defined as: surface hydrocarbon concentration – ≥ 10 g/m ² , dissolved – ≥ 50 ppb and entrained hydrocarbon concentrations – ≥ 100 ppb.

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11.2 Abbreviations

Abbreviation	Meaning
ADIOS	Automated Data Inquiry for Oil Spills
AIIMS	Australasian Inter-Service Incident Management System
ALARP	As low as reasonably practicable
AMOSC	Australian Marine Oil Spill Centre
AMP	Australian Marine Park
AMSA	Australian Maritime Safety Authority
APASA	Asia Pacific ASA
BAOAC	Bonn Agreement Oil Appearance Code
CIMT	Corporate Incident Management Team
DM	Duty Manager
DoT	Western Australia Department of Transport
DBCA	Western Australia Department of Biodiversity, Conservation and Attractions (former Western Australian Department of Parks and Wildlife)
EMBA	Environment that May Be Affected
EP	Environment Plan
Environment Regulations	Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009
ESI	Environmental Sensitivity Index
ESD	Ecologically Sustainable Development
ESP	Environmental Services Panel
FSP	First Strike Response Plan
GIS	Geographic Information System
GPS	Global Positioning System
HSP	Hydrocarbon Spill Preparedness
IAP	Incident Action Plan
IMT	Incident Management Team
IPIECA	International Petroleum Industry Environment Conservation Association
ITOPF	International Tanker Owners Pollution Federation
IUCN	International Union for Conservation of Nature
KBSF	King Bay Supply Facility
KIMC	Karratha Incident Management Centre
KSAT	Kongsberg Satellite
ME	Monitor and Evaluate
MoU	Memorandum of Understanding
NEBA	Net Environmental Benefit Analysis
NOAA	National Oceanic and Atmospheric Administration
NRT	National Response Team
OILMAP	Oil Spill Model and Response System
OPEA	Oil Pollution Emergency Arrangements

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Abbreviation	Meaning
OPEP	Oil Pollution Emergency Plan
OPGSA	Offshore Petroleum and Greenhouse Gas Storage Act
OSMP	Operational and Scientific Monitoring Program
OSRL	Oil Spill Response Limited
OSTM	Oil Spill Trajectory Modelling
OWR	Oiled Wildlife Response
OWRP	Oiled Wildlife Response Plan
OWROP	Regional Oiled Wildlife Response Operational Plan
PAP	Petroleum Activities Program
PBA	Pre-emptive Baseline Areas
PPA	Priority Protection Area
PPB	Parts per billion
PPM	Parts per million
PS	Performance standard
RPA	Response Protection Area
SIMAP	Integrated Oil Spill Impact Model System
SMP	Scientific monitoring program
SOP	Standard Operating Procedure
TRP	Tactical Response Plan
WHA	World Heritage Area
Woodside/ WEL	Woodside Energy Limited
WCC	Woodside Communication Centre
WCCS	Worst Case Credible Scenario

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ANNEX A: NET ENVIRONMENTAL BENEFIT ANALYSIS DETAILED OUTCOMES

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A NEBA has been conducted to assess the net environmental benefit of different response techniques to selected receptors in the event of an oil spill from the PAP for marine diesel. The complete list of potential receptor locations within the EMBA for the PAP is included in Section 6 of the EP.

The NEBA was conducted for open Commonwealth waters and the Gascoyne AMP (identified as an RPA). The EMBA was not predicted by modelling to overlap any RPAs above the surface threshold of >1 g/m² or the shoreline accumulation threshold of >10 g/m². However, the Gascoyne AMP was predicted to be contacted by hydrocarbons above the entrained threshold of 100 ppb (prior to day 14).

The detailed NEBA assessment outcomes are shown below.

The full NEBA assessments are available here ([Link](#)).

Table A-1: NEBA assessment technique recommendations for a surface release due to a vessel tank rupture of marine diesel (Credible Scenario-01)

Receptor	Monitor and Evaluate	Containment and Recovery	Dispersant application: > 20 m water depth and > 10 km from shore/reefs	Shoreline protection	Shoreline clean-up (manual)	Shoreline clean-up (mechanical)	Shoreline clean-up (chemical)	Oiled Wildlife Response	In situ burning	Mechanical dispersion	Source Control
Open Commonwealth waters (Operational Area)	Yes	No	No	No	No	No	No	Potentially	No	No	Yes
Gascoyne AMP	Yes	No	No	No	No	No	No	Potentially	No	No	Yes

Overall assessment

Sensitive receptor (Sites identified in EP)	Monitor and Evaluate	Containment and Recovery	Dispersant application: > 20 m water depth and > 10 km from shore/reefs	Shoreline protection	Shoreline clean-up (manual)	Shoreline clean-up (mechanical)	Shoreline clean-up (chemical)	Oiled Wildlife Response	In situ burning	Mechanical dispersion	Source Control
Is this response Practicable?	Yes	No	No	No	No	No	No	Potentially	No	No	Yes
NEBA Identifies Response potentially of Net Environmental Benefit?	Yes	No	No	No	No	No	No	Potentially	No	No	Yes

NEBA Impact Ranking Classification Guidance

To reduce variability between assessments, the following ranking descriptions have been devised to guide the workshop process:

		Degree of impact		Potential duration of impact	Equivalent Woodside Corporate Risk Matrix Consequence Level
Positive	3P	Major	<p>Likely to prevent:</p> <ul style="list-style-type: none"> behavioural impact to biological receptors behavioural impact to socio-economic receptors e.g. changes to day-to-day business operations, public opinion/behaviours (e.g. avoidance of amenities such as beaches) or regulatory designations. 	Decrease in duration of impact by > 5 years	N/A
	2P	Moderate	<p>Likely to prevent:</p> <ul style="list-style-type: none"> significant impact to a single phase of reproductive cycle of biological receptors detectable financial impact, either directly (e.g. loss of income) or indirectly (e.g. via public perception), for socio-economic receptors. 	Decrease in duration of impact by 1–5 years	N/A
	1P	Minor	<p>Likely to prevent impacts on:</p> <ul style="list-style-type: none"> significant proportion of population or breeding stages of biological receptors socio-economic receptors such as: <ul style="list-style-type: none"> significant impact to the sensitivity of protective designation; or significant and long-term impact to business/industry. 	Decrease in duration of impact by several seasons (< 1 year)	N/A
	0	Non-mitigated spill impact	No detectable difference to unmitigated spill scenario.		
Negative	1N	Minor	<p>Likely to result in:</p> <ul style="list-style-type: none"> behavioural impact to biological receptors behavioural impact to socio-economic receptors e.g. changes to day-to-day business operations, public opinion/behaviours (e.g. avoidance of amenities such as beaches), or regulatory designations. <p>[Note 1]</p>	Increase in duration of impact by several seasons (< 1 year)	Increase in risk by one sub-category, without changing category (e.g. Minor (E) to Minor (D))
	2N	Moderate	<p>Likely to result in:</p> <ul style="list-style-type: none"> significant impact to a single phase of reproductive cycle for biological receptors; or detectable financial impact, either directly (e.g. loss of income) or indirectly (e.g. via public perception), for socio-economic receptors. This level of negative impact is recoverable and unlikely to result in closure of business/industry in the region. 	Increase in duration of impact by 1–5 years	Increase in risk by one category (e.g. Minor (D) to Moderate (C or B))
	3N	Major	<p>Likely to result in impacts on:</p> <ul style="list-style-type: none"> significant proportion of population or breeding stages of biological receptors socio-economic receptors resulting in either: <ul style="list-style-type: none"> significant impact to the sensitivity of protective designation; or significant and long-term impact to business/industry. 	Increase in duration of impact by > 5 years or unrecoverable	Increase in risk by two categories (e.g. Minor (E) to Major (A))

NOTE 1: the maximum likely impact should be considered; for example, if a spill were to directly impact the behaviour that results in an impact to reproduction and/or the breeding population (such as fish failing to aggregate to spawn), then the score should be a 2 or 3 rather than a 1. Similarly, if a change in behaviour resulted in an increased risk of mortality of a population, then it should be scored as a 2 or 3.

ANNEX B: OPERATIONAL MONITORING ACTIVATION AND TERMINATION CRITERIA

Table B-1: Operational monitoring objectives, triggers and termination criteria

Operational Monitoring Operational Plan	Objectives	Activation triggers	Termination criteria
<p>Operational Monitoring Operational Plan 1 (OM01)</p> <p>Predictive Modelling of Hydrocarbons to Assess Resources at Risk</p>	<p>OM01 focuses on the conditions that have prevailed since a spill commenced, as well as those that are forecasted in the short term (1–3 days ahead) and longer term. OM01 utilises computer-based forecasting methods to predict hydrocarbon spill movement and guide the management and execution of spill response operations to maximise the protection of environmental resources at risk.</p> <p>The objectives of OM01 are to:</p> <ul style="list-style-type: none"> • Provide forecasting of the movement and weathering of spilled hydrocarbons • Identify resources that are potentially at risk of contamination • Provide simulations showing the outcome of alternative response options (booming patterns etc.) to inform on-going Net Environmental Benefit Analysis (NEBA) and continually assess the efficacy of available response options in order to reduce risks to ALARP 	<p>OM01 will be triggered immediately following a level 2/3 hydrocarbon spill.</p>	<p>The criteria for the termination of OM01 are:</p> <ul style="list-style-type: none"> • The hydrocarbon discharge has ceased • Response activities have ceased • Hydrocarbon spill modelling (as verified by OM02 surveillance observations) predicts no additional natural resources will be impacted

Operational Monitoring Operational Plan	Objectives	Activation triggers	Termination criteria
<p>Operational Monitoring Operational Plan 2 (OM02)</p> <p>Surveillance and reconnaissance to detect hydrocarbons and resources at risk</p>	<p>OM02 aims to provide regular, on-going hydrocarbon spill surveillance throughout a broad region, in the event of a spill.</p> <p>The objectives of OM02 are:</p> <ul style="list-style-type: none"> • Verify spill modelling results and recalibrate spill trajectory models (OM01) • Understand the behaviour, weathering and fate of surface hydrocarbons • Identify environmental receptors and locations at risk or contaminated by hydrocarbons • Inform ongoing Net Environmental Benefit Analysis (NEBA) and continually assess the efficacy of available response options in order to reduce risks to ALARP • To aid in the subsequent assessment of the short- to long-term impacts and/or recovery of natural resources (assessed in SMPs) by ensuring that the visible cause and effect relationships between the hydrocarbon spill and its impacts to natural resources have been observed and recorded during the operational phase. 	<p>OM02 will be triggered immediately following a level 2/3 hydrocarbon spill.</p>	<p>The termination triggers for the OM02 are:</p> <ul style="list-style-type: none"> • 72 hours has elapsed since the last confirmed observation of surface hydrocarbons • Latest hydrocarbon spill modelling results (OM01) do not predict surface exposures at visible levels
<p>Operational Monitoring Operational Plan 3 (OM03)</p> <p>Monitoring of hydrocarbon presence, properties, behaviour and weathering in water</p>	<p>OM03 will measure surface, entrained and dissolved hydrocarbons in the water column to inform decision-making for spill response activities.</p> <p>The specific objectives of OM03 are as follows:</p> <ul style="list-style-type: none"> • Detect and monitor for the presence, quantity, properties, behaviour and weathering of surface, entrained and dissolved hydrocarbons • Verify predictions made by OM01 and observations made by OM02 about the presence and extent of hydrocarbon contamination <p>Data collected in OM03 will also be used for the purpose of longer-term water quality monitoring during SM01.</p>	<p>OM03 will be triggered immediately following a level 2/3 hydrocarbon spill.</p>	<p>The criteria for the termination of OM03 are as follows:</p> <ul style="list-style-type: none"> • The hydrocarbon release has ceased • Response activities have ceased • Concentrations of hydrocarbons in the water are below available ANZECC/ ARMCANZ (2000) trigger values for 99% species protection.

Operational Monitoring Operational Plan	Objectives	Activation triggers	Termination criteria
<p>Operational Monitoring Operational Plan 4 (OM04)</p> <p>Pre-emptive assessment of sensitive receptors at risk</p>	<p>OM04 aims to undertake a rapid assessment of the presence, extent and current status of shoreline sensitive receptors prior to contact from the hydrocarbon spill, by providing categorical or semi-quantitative information on the characteristics of resources at risk.</p> <p>The primary objective of OM04 is to confirm understanding of the status and characteristics of environmental resources predicted by OM01 and OM02 to be at risk, to further assist in making decisions on the selection of appropriate response actions and prioritisation of resources.</p> <p>Indirectly, qualitative/semi-quantitative pre-contact information collected by OM04 on the status of environmental resources may also aid in the verification of environmental baseline data and provide context for the assessment of environmental impacts, as determined through subsequent SMPs.</p>	<p>Triggers for commencing OM04 include:</p> <ul style="list-style-type: none"> • Contact of a sensitive habitat or shoreline is predicted by OM01, OM02 and/or OM03 • The pre-emptive assessment methods can be implemented before contact from hydrocarbons (once a receptor has been contacted by hydrocarbons it will be assessed under OM05) 	<p>The criteria for the termination of OM04 at any given location are:</p> <ul style="list-style-type: none"> • Locations predicted to be contacted by hydrocarbons have been contacted • The location has not been contacted by hydrocarbons and is no longer predicted to be contacted by hydrocarbons (resources should be reallocated as appropriate)

Operational Monitoring Operational Plan	Objectives	Activation triggers	Termination criteria
<p>Operational monitoring operational plan 5 (OM05)</p> <p>Monitoring of contaminated resources</p>	<p>OM05 aims to implement surveys to assess the condition of fauna and habitats contacted by hydrocarbons at sensitive habitat and shoreline locations.</p> <p>The primary objectives of OM05 are:</p> <ul style="list-style-type: none"> Record evidence of oiled fauna (mortalities, sub-lethal impacts, number, extent, location) and habitats (mortalities, sub-lethal impacts, type, extent of cover, area, hydrocarbon character, thickness, mass and content) throughout the response and clean-up at locations contacted by hydrocarbons to inform and prioritise clean-up efforts and resources, while minimising the potential impacts of these activities. <p>Indirectly, the information collected by OM05 may also support the assessment of environmental impacts, as determined through subsequent SMPs.</p>	<p>OM05 will be triggered when a sensitive habitat or shoreline is predicted to be contacted by hydrocarbons by OM01, OM02 and/or OM03.</p>	<p>The criteria for the termination of OM05 at any given location are:</p> <ul style="list-style-type: none"> No additional response or clean-up of fauna or habitats is predicted Spill response and clean-up activities have ceased <p>OM05 survey sites established at sensitive habitat and shoreline locations will continue to be monitored during SM02.</p> <p>The formal transition from OM05 to SM02 will begin on cessation of spill response and clean-up activities.</p>

ANNEX C: OIL SPILL SCIENTIFIC MONITORING PROGRAM

Oil Spill Environmental Monitoring

The following provides some further detail on Woodside's oil spill scientific monitoring Program and includes the following:

- The organisation, roles and responsibilities of the Woodside oil spill scientific monitoring team and external resourcing.
- A summary table of the ten scientific monitoring programs as per the specific focus receptor, objectives, activation triggers and termination criteria.
- Details on the oil spill environmental monitoring activation and termination decision-making processes.
- Baseline knowledge and environmental studies knowledge access via geo-spatial metadata databases.
- An outline of the reporting requirements for oil spill scientific monitoring programs.

Oil Spill Scientific Monitoring – Delivery Team Roles and Responsibilities

Woodside Oil Spill Scientific Monitoring Delivery Team

The Woodside science team are responsible for the delivery of the oil spill scientific monitoring. The roles and responsibilities of the Woodside scientific monitoring delivery team are presented in Table C-1 and the organisational structure and Corporate Incident Management Team (CIMT) linkage provided in Figure C-1.

Woodside Oil Spill Scientific monitoring program - External Resourcing

In the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors, scientific monitoring personnel and scientific equipment to implement the appropriate SMPs will be provided by SMP Standby contractor who hold a standby contract for SMP via the Woodside Environmental Services Panel (ESP). In the event that additional resources are required other consultancy capacity within the Woodside ESP will be utilised (as needed and may extend to specialist contractors such as research agencies engaged in long-term marine monitoring programs). In consultation with the SMP Standby Contractor and/or specialist contractors, the selection, field sampling and approach of the SMPs will be determined by the nature and scale of the spill.

Table C-1: Woodside and Environmental Service Provider – Oil Spill Scientific Monitoring Program Delivery Team Key Roles and Responsibilities

Role	Location	Responsibility
Woodside Roles		
SMP Lead/Manager	Onshore	<ul style="list-style-type: none"> • Approves activated the SMPs based on operational monitoring data provided by the Planning Function • Provides advice to the CIMT in relation to scientific monitoring • Provides technical advice regarding the implementation of scientific monitoring • Approves detailed sampling plans prepared for SMPs • Directs liaison between statutory authorities, advisors and government agencies in relation to SMPs.
SMP Co-Ordinator	Onshore	<ul style="list-style-type: none"> • Activates the SMPs based on operational monitoring data provided by the Planning Function • Sits in the Planning function of the CIMT. • Liaises with other CIMT functions to deliver required logistics, resources and operational support from Woodside to support the Environmental Service Provider in delivering on the SMPs. Acts as the conduit for advice from the SMP Lead/Manager to the Environmental Service Provider • Manages the Environmental Service Provider's implementation of the SMPs • Liaises with the Environmental Service Provider on delivery of the SMPs • Arranges all contractual matters, on behalf of Woodside, associated with the Environmental Service Provider's delivery of the SMPs.

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Role	Location	Responsibility
Environmental Service Provider Roles		
SMP standby contractor: SMP Duty Manager/Project Manager	Onshore	<ul style="list-style-type: none"> • Coordinates the delivery of the SMPs • Provides costings, schedule and progress updates for delivery of SMPs • Determines the structure of the Environmental Service Provider's team to necessitate delivery of the SMPs • Verifies that HSE Plans, detailed sampling plans and other relevant deliverables are developed and implemented for delivery of the SMPs • Directs field teams to deliver SMPs • Arranges all contractual matters, on behalf of Environmental Service Provider, associated with the delivery of the SMPs to Woodside • Manages sub-consultant delivery to Woodside • Provides required personnel and equipment to deliver the SMPs
SMP Field Teams	Offshore – Monitoring Locations	<ul style="list-style-type: none"> • Delivers the SMPs in the field consistent with the detailed sampling plans and HSE requirements, within time and budget. • Early communication of time, budget, HSE risks associated with delivery of the SMPs to the Environmental Service Provider – Project Manager • Provides start up, progress and termination updates to the Environmental Service Provider – Project Manager (will be led in-field by a party chief).

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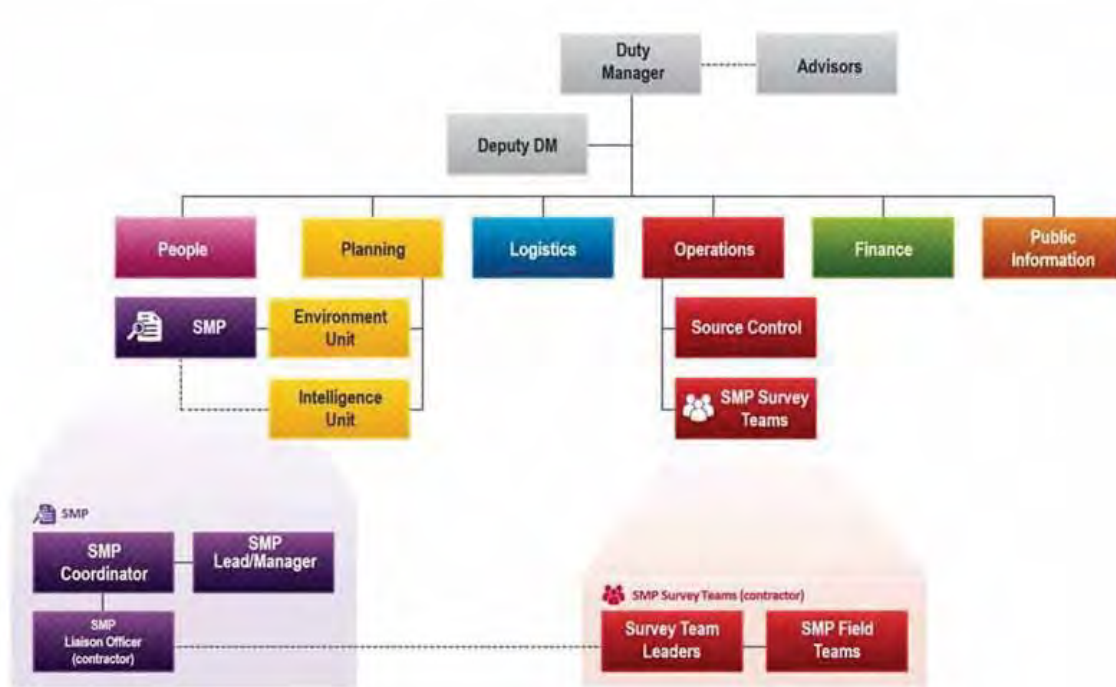


Figure C-1: Woodside Oil Spill Scientific Monitoring Program Delivery Team and Linkage to Corporate Incident Management Team (CIMT) organisational structure.

Table C-2: Oil Spill Environmental Monitoring: Scientific Monitoring Program - Objectives, Activation Triggers and Termination Criteria

Scientific monitoring Program (SMP)		Objectives	Activation Triggers	Termination Criteria
Scientific monitoring program 1 (SM01) Assessment of Hydrocarbons in Marine Waters	SM01 will detect and monitor the presence, extent, persistence and properties of hydrocarbons in marine waters following the spill and the response. The specific objectives of SM01 are as follows: <ul style="list-style-type: none"> Assess and document the extent, severity, and persistence of hydrocarbon contamination with reference to observations made during surveillance activities and /or in-water measurements made during operational monitoring; and Provide information that may be used to interpret potential cause and effect drivers for environmental impacts recorded for sensitive receptors monitored under other SMPs. 	SM01 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors	SM01 will be terminated when: <ul style="list-style-type: none"> Operational monitoring data relating to observations and / or measurements of hydrocarbons on and in water have been compiled, analysed and reported; and The report provides details of the extent, severity and persistence of hydrocarbons which can be used for analysis of impacts recorded for sensitive receptors monitored under other SMPs. SMP monitoring of sensitive receptor sites: <ul style="list-style-type: none"> Concentrations of hydrocarbons in water samples are below NOPSEMA guidance note (2019)¹⁰ concentrations of 1 g/m³ for floating, 10 ppb for entrained and dissolved; and Details of the extent, severity and persistence of hydrocarbons from concentrations recorded in water have been documented at sensitive receptor sites monitored under other SMPs. 	
Scientific monitoring program 2 (SM02) Assessment of the Presence, Quantity and Character of Hydrocarbons in Marine Sediments	SM02 will detect and monitor the presence, extent, persistence and properties of hydrocarbons in marine sediments following the spill and the response. The specific objectives of SM02 are as follows: <ul style="list-style-type: none"> Determine the extent, severity and persistence of hydrocarbons in marine sediments across selected sites where hydrocarbons were observed or recorded during operational monitoring; and Provide information that may be used to interpret potential cause and effect drivers for environmental impacts recorded for sensitive receptors monitored under other SMPs. 	SM02 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented as follows: <ul style="list-style-type: none"> Response activities have ceased; and Operational monitoring results made during the response phase indicate that shoreline, intertidal or sub-tidal sediments have been exposed to surface, entrained or dissolved hydrocarbons (at or above 0.5 g/m² surface, 5 ppb for entrained/dissolved hydrocarbons and ≥1 g/m² for shoreline accumulation). 	SM02 will be terminated once pre-spill condition is reached and agreed upon as per the SMP termination criteria process and include consideration of: <ul style="list-style-type: none"> Concentrations of hydrocarbons in sediment samples are below ANZECC/ARMCANZ (2013)¹¹ sediment quality guideline values (SQGVs) for biological disturbance; and Details of the extent, severity and persistence of hydrocarbons from concentrations recorded in sediments have been documented. 	
Scientific monitoring program 3 (SM03) Assessment of Impacts and Recovery of Subtidal and Intertidal Benthos	The objectives of SM03 are: <ul style="list-style-type: none"> Characterize the status of intertidal and subtidal benthic habitats and quantify any impacts to functional groups, abundance and density that may be a result of the spill; and Determine the impact of the hydrocarbon spill and subsequent recovery (including impacts associated with the implementation of response options). Categories of intertidal and subtidal habitats that may be monitored include: <ul style="list-style-type: none"> Coral reefs Seagrass Macro-algae Filter-feeders SM03 will be supported by sediment contamination records (SM02) and characteristics of the spill derived from OMPs.	SM03 will be activated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented as follows: <ul style="list-style-type: none"> As part of a pre-emptive assessment of PBAs of receptor locations identified by time to hydrocarbon contact > 10 days, to target receptors and sites where it is possible to acquire pre-hydrocarbon contact baseline; and Operational monitoring identified shoreline potential contact of hydrocarbons (at or above 0.5 g/m² surface, 5 ppb for entrained/dissolved hydrocarbons and ≥1 g/m² for shoreline accumulation) for subtidal and intertidal benthic habitat. 	SM03 will be terminated once pre-spill condition is reached and agreed upon as per the SMP termination criteria process and include consideration of: <ul style="list-style-type: none"> Overall impacts to benthic habitats from hydrocarbon exposure have been quantified. Recovery of impacted benthic habitats has been evaluated. Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill. 	
Scientific monitoring program 4 (SM04) Assessment of Impacts and Recovery of Mangroves / Saltmarsh	The objectives of SM04 are: <ul style="list-style-type: none"> Characterize the status of mangroves (and associated salt marsh habitat) at shorelines exposed/contacted by spilled hydrocarbons; Quantify any impacts to species (abundance and density) and mangrove/saltmarsh community structure; and Determine and monitor the impact of the hydrocarbon spill and potential subsequent recovery (including impacts associated with the implementation of response options). SM03 will be supported by sediment sampling undertaken in SM02 and characteristics of the spill derived from OMPs.	SM04 will be activated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented as follows: <ul style="list-style-type: none"> As part of a pre-emptive assessment of receptor locations identified by time to hydrocarbon contact > 10 days; and 	SM04 will be terminated once pre-spill condition is reached and agreed upon as per the SMP termination criteria process and include consideration of: <ul style="list-style-type: none"> Impacts to mangrove and saltmarsh habitat from hydrocarbon exposure have been quantified. Recovery of impacted mangrove/saltmarsh habitat has been evaluated. 	

¹⁰ NOPSEMA (2019) Bulletin #1 – Oil spill modelling – April 2019, <https://www.nopsema.gov.au/assets/Bulletins/AG52993.pdf>

¹¹ Simpson SL, Bailey GB and Charlton AA (2013). Revision of the ANZECC/ARMCANZ Sediment Quality Guidelines. CSIRO and Water Science Report 08/07. Land and Water, pp. 132.

Scientific monitoring Program (SMP)	Objectives	Activation Triggers	Termination Criteria
<p>Scientific monitoring program 5 (SM05) Assessment of Impacts and Recovery of Seabird and Shorebird Populations</p>	<p>The Objectives of SM05 are to:</p> <ul style="list-style-type: none"> Collate and quantify impacts to avian wildlife from results recorded during OM02 and OM05 (such as mortalities, oiling, rescue and release counts) and undertake a desk-based assessment to infer potential impacts at species population level; and Undertake monitoring to quantify and assess impacts of hydrocarbon exposure to seabirds and shorebird populations at targeted breeding colonies / staging sites / important coastal wetlands where hydrocarbon contact was recorded. 	<ul style="list-style-type: none"> Operational monitoring identified shoreline potential contact of hydrocarbons (at or above 0.5 g/m² surface, 5 ppb for entrained/dissolved hydrocarbons and ≥1 g/m² for shoreline accumulation) for mangrove/saltmarsh habitat. <p>SM05 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented as follows:</p> <ul style="list-style-type: none"> As part of a pre-emptive assessment of receptor locations identified by time to hydrocarbon contact >10 days; Operational monitoring predicts shoreline contact of hydrocarbons (at or above 0.5 g/m² surface, 5 ppb for entrained/dissolved hydrocarbons and ≥1 g/m² for shoreline accumulation) at important bird colonies / staging sites / important coastal wetland locations; or Records of dead, oiled or injured bird species made during the hydrocarbon spill or response. 	<ul style="list-style-type: none"> Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill. <p>SM05 will be terminated once it is agreed that the receptor has returned to pre-spill condition. The SMP termination criteria process will be followed and include consideration of:</p> <ul style="list-style-type: none"> Impacts to seabird and shorebird populations from hydrocarbon exposure have been quantified. Recovery of impacted seabird and shorebird populations has been evaluated. Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill.
<p>Scientific monitoring program 6 (SM06) Assessment of Impacts and Recovery of Nesting Marine Turtle Populations</p>	<p>The objectives of SM06 are to:</p> <ul style="list-style-type: none"> To quantify impacts of hydrocarbon exposure or contact on marine turtle nesting populations (including impacts associated with the implementation of response options); Collate and quantify impacts to adult and hatching marine turtles from results recorded during OM02 and OM05 (such as mortalities, oiling, rescue and release counts) and undertake a desk-based assessment to infer potential impacts at species population levels (including impacts associated with the implementation of response options); and Undertake monitoring to quantify and assess impacts of hydrocarbon exposure to nesting marine turtle populations at known rookeries (including impacts associated with the implementation of response options). 	<p>SM06 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented if operational monitoring has:</p> <ul style="list-style-type: none"> As part of a pre-emptive assessment of receptor locations identified by time to hydrocarbon contact >10 days; Predicted shoreline contact of hydrocarbons (at or above 0.5 g/m² surface, 5 ppb for entrained/dissolved hydrocarbons and ≥1 g/m² for shoreline accumulation) at known marine turtle rookery locations; or Records of dead, oiled or injured marine turtle species made during the hydrocarbon spill or response. 	<p>SM06 will be terminated once it is agreed that the receptor has returned to pre-spill condition. The SMP termination criteria process will be followed and include consideration of:</p> <ul style="list-style-type: none"> Impacts to nesting marine turtle populations from hydrocarbon exposure have been quantified. Recovery of impacted nesting marine turtle populations has been evaluated. Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill.
<p>Scientific monitoring program 7 (SM07) Assessment of Impacts to Pinniped Colonies including Haul-out Site Populations</p>	<p>The objectives of SM07 are to:</p> <ul style="list-style-type: none"> Quantify impacts on pinniped colonies and haul-out sites as a result of hydrocarbon exposure/contact. Collate and quantify impacts to pinniped populations from results recorded during OM02 and OM05 (such as mortalities, oiling, rescue and release counts) and undertake a desk-based assessment to infer potential impacts at species population levels. 	<p>SM07 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented if operational monitoring has:</p> <ul style="list-style-type: none"> As part of a pre-emptive assessment of receptor locations identified by time to hydrocarbon contact >10 days; Identified shoreline contact of hydrocarbons ((at or above 0.5 g/m² surface, ≥5 ppb for entrained/dissolved hydrocarbons and ≥1 g/m² for shoreline accumulation) at known pinniped colony or haul-out site(s) (i.e. most northern site is the Houtman Abrohos Islands); or Records of dead, oiled or injured pinniped species made during the hydrocarbon spill or response. 	<p>SM07 will be terminated once it is agreed that the receptor has returned to pre-spill condition. The SMP termination criteria process will be followed and include consideration of:</p> <ul style="list-style-type: none"> Impacts to pinniped populations from hydrocarbon exposure have been quantified. Recovery of pinniped populations has been evaluated. Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill.
<p>Scientific monitoring program 8 (SM08) Desk-Based Assessment of Impacts to Other Non-Avian Marine Megafauna</p>	<p>The objective of SM08 is to provide a desk-based assessment which collates the results of OM02 and OM05 where observations relate to the mortality, stranding or oiling of mobile marine megafauna species not addressed in SM06 or SM07, including:</p> <ul style="list-style-type: none"> Cetaceans; Dugongs; Whale sharks and other shark and ray populations; Sea snakes; and Crocodiles. 	<p>SM08 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented if operational monitoring reports records of dead, oiled or injured non-avian marine megafauna during the spill/ response phase.</p>	<p>SM08 will be terminated when the results of the post-spill monitoring have quantified impacts to non-avian megafauna.</p> <ul style="list-style-type: none"> Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill.

Scientific monitoring Program (SMP)		Objectives	Activation Triggers	Termination Criteria
		The desk-based assessment will include population analysis to infer potential impacts to marine megafauna species populations.		
Scientific monitoring program 9 (SM09) Assessment of Impacts and Recovery of Marine Fish associated with SM03 habitats	<p>The objectives of SM09 are:</p> <ul style="list-style-type: none"> Characterise the status of resident fish populations associated with habitats monitored in SM03 exposed/contacted by spilled hydrocarbons; Quantify any impacts to species (abundance, richness and density) and resident fish population structure (representative functional trophic groups), and Determine and monitor the impact of the hydrocarbon spill and potential subsequent recovery (including impacts associated with the implementation of response options). 	<p>SM09 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented with SMO3.</p>	<p>SM09 will be undertaken and terminated concurrent with monitoring undertaken for SM03, as per the SMP termination criteria process</p> <ul style="list-style-type: none"> Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill. 	
Scientific monitoring program 10 (SM10) SM10 - Assessment of physiological impacts important fish and shellfish species (fish health and seafood quality/safety) and recovery	<p>SM10 aims to assess any physiological impacts to important commercial fish and shellfish species (assessment of fish health) and if applicable, seafood quality/safety. Monitoring will be designed to sample key commercial fish and shellfish species and analyse tissues to identify fish health indicators and biomarkers, for example:</p> <ul style="list-style-type: none"> Liver Detoxification Enzymes (ethoxycresorufin-O-deethylase (EROD) activity) PAH Biliary Metabolites Oxidative DNA Damage Serum SDH Other physiological parameters, such as condition factor (CF), liver somatic index (LSI), gonado-somatic index (GSI) and gonad histology, total weight, length, condition, parasites, egg development, testes development, abnormalities. Seafood tainting may be included (where appropriate) using applicable sensory tests to objectively assess targeted finfish and shellfish species for hydrocarbon contamination. <p>Results will be used to make inferences on the health of commercial fisheries and the potential magnitude of impacts to fishing industries.</p>	<p>SM10 will be initiated in the event of a Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors and implemented if operational monitoring (OM01, OM02 and OM05) indicates the following:</p> <ul style="list-style-type: none"> The hydrocarbon spill will or has intersected with active commercial fisheries or aquaculture activities. Commercially targeted finfish and/or shellfish mortality has been observed/recorded. Commercial fishing or aquaculture areas have been exposed to hydrocarbons ($\geq 0.5 \text{ g/m}^2$ surface and $\geq 5 \text{ ppb}$ for entrained/dissolved hydrocarbons); and Taste, odour or appearance of seafood presenting a potential human health risk is observed. 	<p>SM10 will be terminated once it is agreed that the receptor has returned to pre-spill condition. The SMP termination criteria process will be followed and include consideration of:</p> <ul style="list-style-type: none"> Physiological impacts to important commercial fish and shellfish species from hydrocarbon exposure have been quantified. Recovery of important commercial fish and shellfish species from hydrocarbon exposure has been evaluated. Impacts to seafood quality/safety (if applicable) have been assessed and information provided to the relevant persons/ organisations and regulators for the management of any impacted fisheries. Agreement with relevant persons/ organisations and regulators based on the nature and scale of the hydrocarbon spill impacts and/or that observed impacts can no longer be attributed to the spill. 	

Activation Triggers and Termination Criteria

Scientific monitoring program Activation

The Woodside oil spill scientific monitoring team will be stood up immediately with the occurrence of a hydrocarbon spill (actual or suspected) Level 2 or 3 hydrocarbon release, or any release event with the potential to contact sensitive environmental receptors via the first strike plan for the petroleum activity programme. The presence of any level of hydrocarbons in the marine environment triggers the activation of the oil spill scientific monitoring program (SMP). This is to ensure the full range of eventualities relating to the environmental, socio-economic and health consequences of the spill are considered in the planning and execution of the SMP. The activation process also takes into consideration the management objectives, species recovery plans, conservation advices and conservations plans for any World Heritage Area (WHA), CMRs, State Marine Parks, other protected area designations (e.g., State nature reserves) and Matters of National Environmental Significance (including listed species under part 3 of the EPBC Act) potentially exposed to hydrocarbons. With the first 24-48 hours of a spill event, such information will be sourced and evaluated as part of the SMP planning process guided by Appendix D (identified receptors vulnerable to hydrocarbon contact), the information presented in the Existing Environment section of the EP as well as other information sources such as the Woodside Baseline Environmental Studies Database ([Link](#)).

The starting point for decision-making on what SMPs are activated and spatial extent of monitoring activities will be based on the predictive modelling results (OM01) in the first 24-48 hours until more information is made available from other operational monitoring activities such as aerial surveillance and shoreline surveys. Pre-emptive Baseline Areas (WHA, CMRs and State Marine Parks encompassing key ecological and socio-economic values) are a key focus of the SMP activation decision-making process, particularly, in the early spill event/response phase. As the operational monitoring progresses and further situational awareness information becomes available, it will be possible to understand the nature and scale of the spill. The SMP activation and implementation decision-making will be revisited on a daily basis to account for the updates on spill information. One of the priority focus areas in the early phase of the incident will be to identify and execute pre-emptive SMP assessments at key receptor locations, as required. The SMP activation and implementation decision tree is presented in Figure C-2.

Scientific monitoring Program Termination

The basis of the termination process for the active SMPs (SMPs 1-10) will include quantification of impacts, evaluation of recovery for the receptor at risk and consultation with relevant authorities, persons and organisations. Termination of each SMP will not be considered until the results (as presented in annual SMP reports for the duration of each program) indicate that the target receptor has returned to pre-spill condition.

Once the SMP results indicate impacted receptor(s) have returned to pre-spill condition (as identified by Woodside) a termination decision-making process will be triggered and a number of steps will be undertaken as follows:

- Woodside will engage expert opinion on whether the receptor has returned to pre-spill condition (based on monitoring data). Subject Matter Expert (SMEs) will be engaged (via the Woodside SME scientific monitoring terms of reference ([Link](#))) to review program outcomes, provide expert advice and recommendations for the duration of each SMP.
- Where expert opinion agrees that the receptor has returned to pre-spill condition, findings will then be presented to the relevant authorities, persons and organisations (as defined by the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulation 11A). Identification of, planning and engagement with relevant persons/ organisations will be managed by Woodside's Reputation Functional Support Team (FST) and follow the stakeholder management FST ([Link](#)). These guidelines outline the FST roles and responsibilities, competencies, communications and planning processes. An assessment of the merits of any objection to termination will be documented in the SMP final report.

- Woodside will decide on termination of SMP based on expert opinion and merits of any relevant persons/ organisations' objections. The final report following termination will include: monitoring results, expert opinion and consultation including merits of any objections.
- Termination of SMPs will also consider applicable management objectives, species recovery plans, conservation advices and conservations plans for any World Heritage Area (WHA), CMRs, State Marine Parks, other protected area designations (e.g., State nature reserves) and Matters of National Environmental Significance (including listed species under part 3 of the EPBC Act).

The SMP termination decision-making process will be applied to each active SMP and an iterative process of decision steps continued until each SMP has been terminated (refer to decision-tree diagram for SMP termination criteria, Figure C-3).

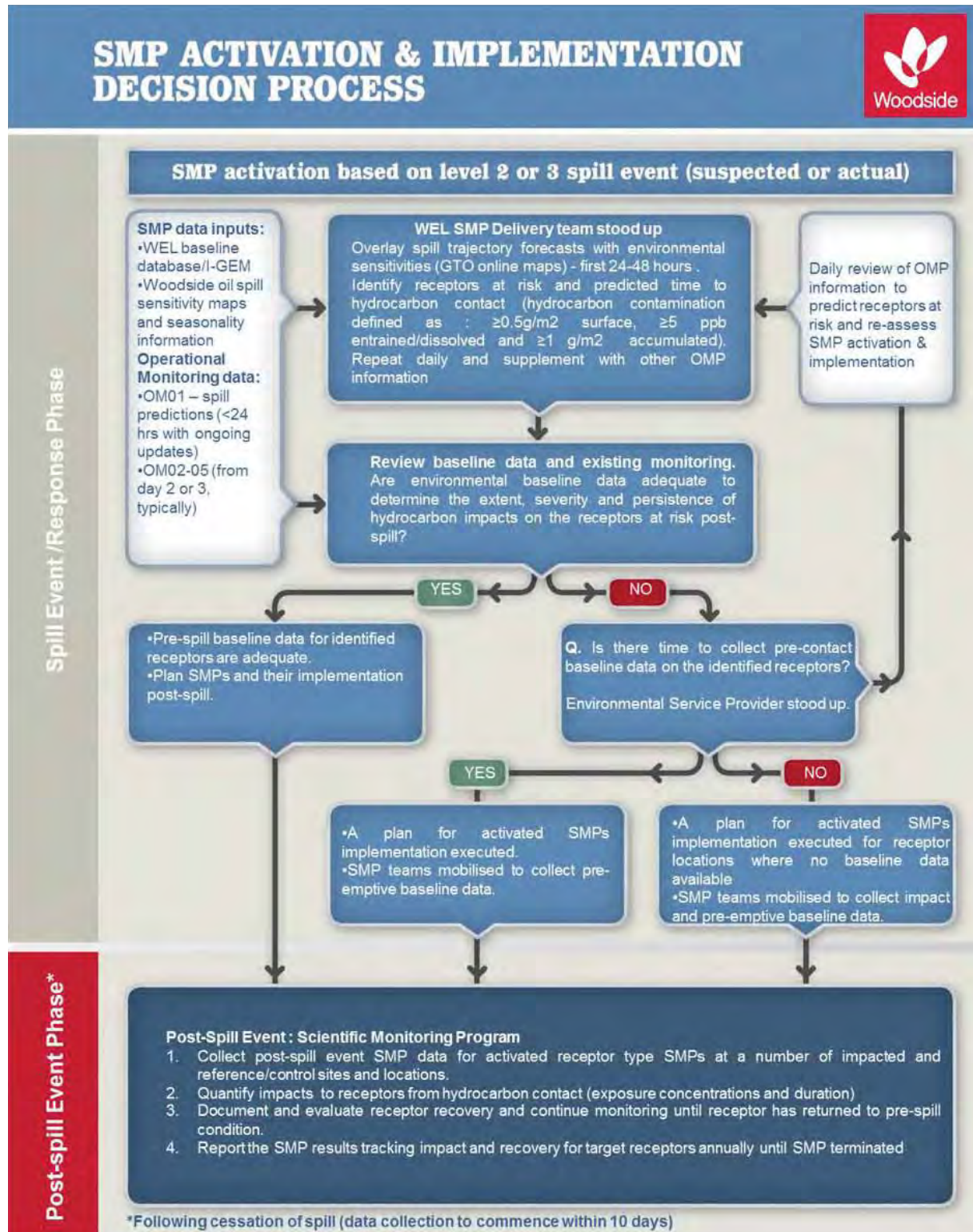


Figure C-2: Activation and Implementation Decision-tree for Oil Spill Environmental Monitoring

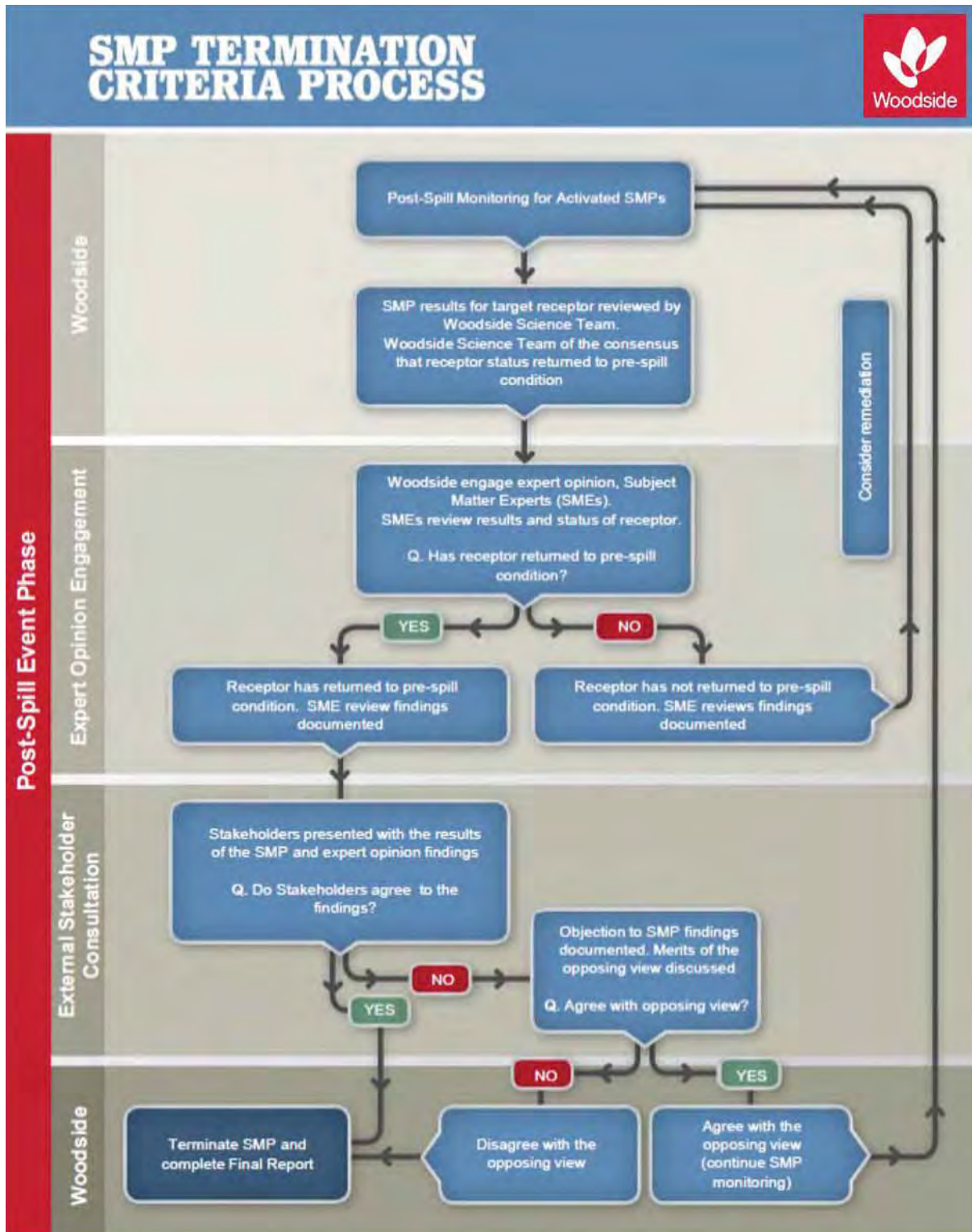


Figure C-3: Termination Criteria Decision-tree for Oil Spill Environmental Monitoring

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Receptors at Risk and Baseline Knowledge

In order to assess the baseline studies available and suitability for oil spill scientific monitoring, Woodside maintains knowledge of environmental baseline studies through the upkeep and use of its Environmental Knowledge Management System.

Woodside's Environmental Knowledge Management System is a centralised platform for scientific information on the existing environment, marine biodiversity, Woodside environmental studies, key environmental impact topics, key literature and web-based resources. The system comprises a number of data directories and an environmental baseline database, as well as folders within the 'Corporate Environment' server space. The environmental baseline database was set up to support Woodside's SMP preparedness and as a SMP resource in the event of an unplanned hydrocarbon spill. The environmental baseline database is subject to updates including annual reviews completed as part of SMP standby contract. This database is accessed pre-PAP to identify Pre-emptive Baseline Areas (PBAs) where hydrocarbon contact is predicted to occur <10 days.

In addition to Woodside's Environmental Knowledge Management System, it is acknowledged that many relevant baseline datasets are held by other organisations (e.g. other oil and gas operators, government agencies, state and federal research institutions and non-governmental organisations). In order to understand the present status of environmental baseline studies a spatial environmental metadata database for Western Australia (Industry-Government Environmental Metadata, I-GEM) was established. IGEM is a collaboration comprising oil and gas operators (including Woodside), government and research agencies and other organisations. IGEM held data were integrated into the Department of Water and Environmental Regulation (WA) Index of Marine Surveys for Assessment (IMSA)¹² in 2020. The Index of Marine Surveys for Assessments (IMSA) is an online portal for information about marine-based environmental surveys in Western Australia. IMSA is a project of the Department of Water and Environmental Regulation (the department) for the systematic capture and sharing of marine data created as part of an environmental impact assessment (EIA).

In the event of an unplanned hydrocarbon release, Woodside intends to interrogate the information on baseline studies status as held by the various databases (e.g. Woodside Environmental Knowledge Management System, IMSA and other sources of existing baseline data) to identify Pre-emptive Baseline Areas (PBAs), i.e., receptors at risk where hydrocarbon contact is predicted to be >10 days, and baseline data can be collected before hydrocarbon contact.

Reporting

For the scientific monitoring program relevant regulators will be provided with:

- Annual reports summarising the SMPs deployed and active, data collection activities and available findings; and
- Final reports for each SMP summarising the quantitative assessment of environmental impacts and recovery of the receptor once returned to pre-spill condition and termination of the monitoring program.

The reporting requirements of the scientific monitoring program will be specific to the individual SMPs deployed and terms of responsibilities, report templates, schedule, QA/QC and peer-review will be agreed with the contractors engaged to conduct the SMPs. Compliance and auditing mechanisms will be incorporated into the reporting terms.

¹² <https://biocollect.ala.org.au/imsa#max%3D20%26sort%3DdateCreatedSort>

ANNEX D: MONITORING PROGRAM AND BASELINE STUDIES FOR THE PETROLEUM ACTIVITIES PROGRAM

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Woodside ID: 1401752708

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ANNEX E: TACTICAL RESPONSE PLANS

TACTICAL RESPONSE PLANS
Exmouth
Mangrove Bay
Turquoise Bay
Yardie Creek
Muiron Islands
Jurabi to Lighthouse Beaches Exmouth
Ningaloo Reef - Refer to Mangrove/Turquoise bay and Yardie Creek
Exmouth Gulf
Shark Bay Area 1: Carnarvon to Wooramel
Shark Bay Area 2: Wooramel to Petite Point
Shark Bay Area 3: Petite Point to Dubaut Point
Shark Bay Area 4: Dubaut Point to Herald Bight
Shark Bay Area 5: Herald Bight to Eagle Bluff
Shark Bay Area 6: Eagle Bluff to Useless Loop
Shark Bay Area 7: Useless Loop to Cape Bellefin
Shark Bay Area 8: Cape Bellefin to Steep Point
Shark Bay Area 9: Western Shores of Edel Land
Shark Bay Area 10: Dirk Hartog Island
Shark Bay Area 11: Bernier and Dorre Islands
Abrohlos Islands: Pelseart Group
Abrohlos Islands: Wallabi Group
Abrohlos Islands: Easter Group
Dampier
Rankin Bank and Glomar Shoals
Barrow and Lowendal Islands
Pilbara Islands - Southern Island Group
Montebello Is - Stephenson Channel Nth
Montebello Is Champagne Bay and Chippendale channel
Montebello Is - Claret Bay
Montebello Is - Hermite/Delta Is Channel
Montebello Is - Hock Bay
Montebello Is - North and Kelvin Channel
Montebello Is - Sherry Lagoon Entrance
Withnell Bay
Holden Bay
King Bay
No Name Bay / No Name Beach
Enderby Is -Dampier
Rosemary Island - Dampier
Legendre Is - Dampier
Karratha Gas Plant

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KGP to Whitnell Creek
KGP to Northern Shore
KGP Fire Pond and Estuary
KGP to No Name Creek
Broome
Sahul Shelf Submerged Banks and Shoals
Clerke Reef (Rowley Shoals)
Imperieuse Island (Rowley Shoals)
Mermaid Reef (Rowley Shoals)
Scott Reef
Oiled Wildlife Response
Exmouth
Dampier region
Shark Bay

Appendix E NOPSEMA REPORTING FORMS

NOPSEMA Recordable Environmental Incident monthly Reporting Form
<https://www.nopsema.gov.au/assets/Forms/A198750.doc>

Report of an accident, dangerous occurrence or environmental incident
<https://www.nopsema.gov.au/assets/Forms/N-03000-FM0831-Report-of-an-Accident-Dangerous-Occurrence-or-Environmental-Incident-Rev-8-Jan-2015-MS-Word-2010.docx>

Appendix F CONSULTATION

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Scarborough 4D B1 Marine Seismic Survey Environment Plan

Date: June 2023

Revision: 6

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1. Consultation

1.1 Woodside Consultation Information Sheet (sent to all relevant stakeholders)



STAKEHOLDER CONSULTATION

INFORMATION SHEET

May 2021

SCARBOROUGH 4D BASELINE MARINE SEISMIC SURVEY

NORTHERN CARNARVON BASIN

Woodside is planning to conduct a 4D Baseline marine seismic survey (MSS) over the Scarborough field within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia. The proposed activity is planned to commence in Q3 2022 for a period of between 55 and 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

The proposed survey will be conducted over areas where the Scarborough Joint Venture has previously acquired seismic data. The objective for the proposed activity is to acquire a new 3D seismic

survey that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey) over the Scarborough, North Scarborough and possibly the Jupiter gas fields (located within Petroleum Titles WA-61-L, WA-62-L & WA-61-R).

Woodside is Operator of the various joint ventures relating to the Scarborough, North Scarborough, Thebe and Jupiter fields, which comprise both Woodside and BHP (North West Shelf) Pty Ltd ("BHP"). Current equity participation of the joint venture is as described in the below table.

Gas Fields	Woodside Interest	BHP Interest
Scarborough (WA-61-L)	73.5%	26.5%
North Scarborough (WA-62-L)	73.5%	26.5%
Thebe (WA-63-R)	50%	50%
Jupiter (WA-61-R)	50%	50%

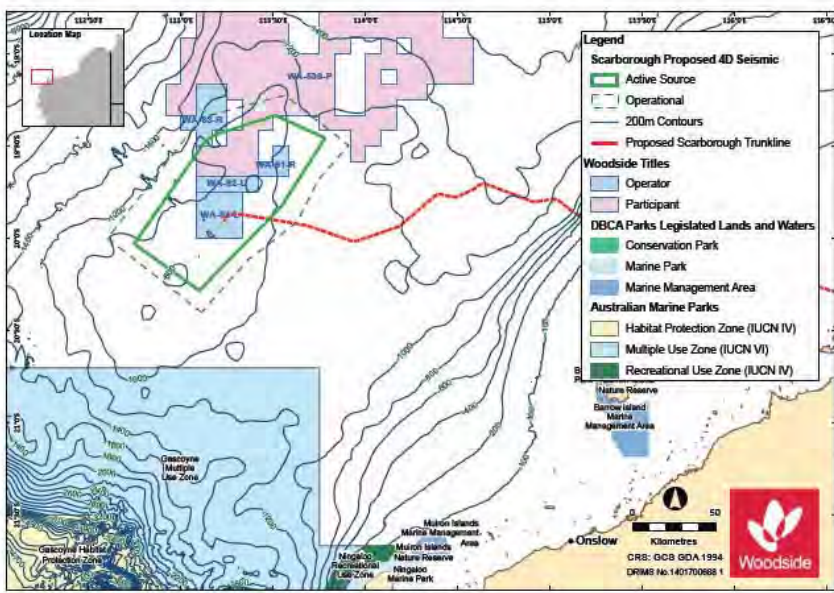


Figure 1. Proposed Scarborough 4D Baseline MSS Active Source and Operational Area

1 Scarborough 4D Baseline Marine Seismic Survey Northern Carnarvon Basin | May 2021

About Marine Seismic Surveys

During planned activities, a seismic vessel traverses a series of pre-determined sail lines within the survey Active Source Area at a speed of approximately three to five knots (5.5– 9.3 km/hr).

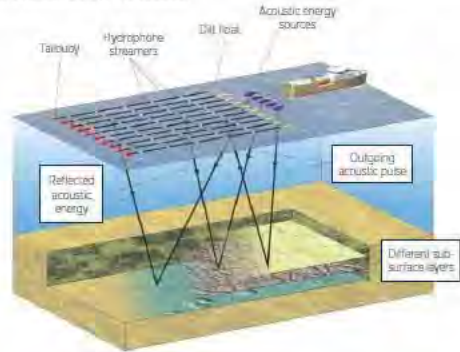
An additional buffer area, or Operational Area, around the Active Source Area is allowed for vessel manoeuvring and line turns. No discharge of the seismic source will occur in this Operational Area. Testing of the seismic source, 'soft starts', and all other operations of the seismic source during seismic lines including 'run ins' and 'run outs' will all be undertaken within the Active Source Area.

As the vessel travels along a sail line series, seismic air sources discharge compressed air to generate acoustic pulses approximately every 2 to 10 seconds.

These acoustic pulses are directed vertically through the water column and into the seabed. The released energy is reflected at geological boundaries, with the reflected signals detected by sensitive microphones called 'hydrophones, geophones or MEMS', embedded within cables, or streamers, towed directly behind the seismic vessel.

The reflected sound is recorded and then processed to generate

a seismic image, providing information about the structure and composition of geological formations and the associated sedimentary properties below the seabed.



Proposed Activity

Table 1 - Activity summary

Activity	Details
Earliest commencement date	Q3 2022
Estimated duration	55 – 70 days
Active Source Area	-5,650 km ²
Operational Area	-9,200 km ²
Water depth in Operational Area	Approximately 800 m – 1150 m
Last acquired data	2004
Vessels	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Distance from Active Source Area to nearest port/marina	214 km north-west of Exmouth
Distance from Active Source Area to nearest marine park	46 km north of Gascoyne Marine Park Multiple Use Zone

The proposed survey will be conducted by a purpose-built seismic survey vessel. The proposed marine seismic survey is typical of seismic surveys conducted in Australian marine waters, in terms of technical methods and procedures.

Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (dual or triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of, autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.

Seismic nodes have been widely used since the mid-2000s using remotely operated vehicles operated from a support vessel for node placement and retrieval from the seabed. However, advances in autonomous technology mean that the nodes will be able to self-reposition. The autonomous devices will make minimal noise when moving between locations and will have negligible disturbance to the seabed when positioning.

An additional support vessel will accompany the seismic vessel for assistance in the form of emergency tow as required and to re-supply the survey vessel with fuel and other logistical and operational supplies. An additional chase vessel may be used to manage interactions with other marine users in the vicinity of the survey if required. Survey activities will take place 24 hrs per day.

Technical details are outlined in Table 2.

Table 2 - Technical overview

Activity	Details
Number of streamers	Up to 14
Each streamer length	~ 8 km
Distance between streamers	between 50 to 100 m
Maximum width of streamer array	~ up to 1.5 km
Safe navigation area (cautionary zone)	Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations
Streamer tow depth	-15 m to 20 m

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Table 4 – Summary of key risks and/or impacts and management measures

Potential Risk and/or Impact	Mitigation and/or Management Measure
Planned activities	
Interests of relevant stakeholders with respect to: <ul style="list-style-type: none"> • Defence activities • Petroleum activities • Commercial fishing activities • Shipping activities • Infrastructure activities 	<ul style="list-style-type: none"> • Consultation with petroleum titleholders, commercial fishers and their representative organisations, and government departments and agencies to inform decision making for the proposed activity and development of the EP. • Advice to relevant stakeholders prior to the commencement of activities. • Ongoing consultation by way of updates on vessel movements during survey activities at a frequency to meet relevant stakeholder needs.
Marine discharges	<ul style="list-style-type: none"> • All routine marine discharges will be managed according to legislative and regulatory requirements and Woodside's Environmental Performance Standards.
Underwater noise	<ul style="list-style-type: none"> • Implementation of <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Policy Statement 2.1. • Noise modelling to inform potential impacts and input to mitigation and management measures.
Vessel interaction	<ul style="list-style-type: none"> • Woodside will notify relevant fishery stakeholders and Government maritime safety agencies of specific start and end dates, specific vessel-on-location dates, and any exclusion zones prior to commencement of the activity. • A three nautical mile radius safe navigation area will be in place around the seismic vessel and streamers during seismic operations. • The seismic vessel will display appropriate day shapes and lights to indicate the vessel is towing and is therefore restricted in its ability to manoeuvre. • The streamers will tow surface tall buoys fitted with safe navigation devices. • A visual and radar watch will be maintained on the project vessel bridge at all times. • A support vessel and a potential chase vessel will be on standby to direct any shipping traffic or commercial fishing vessels away from the seismic vessel and its towed equipment.
Waste management	<ul style="list-style-type: none"> • Waste generated on the vessels will be managed in accordance with legislative requirements and a Waste Management Plan. • Wastes will be managed and disposed of in a safe and environmentally responsible manner that prevents accidental loss to the environment. • Wastes transported onshore will be sent to appropriate recycling or disposal facilities by a licensed waste contractor.
Unplanned activities	
Hydrocarbon release	<ul style="list-style-type: none"> • Appropriate spill response plans, equipment and materials will be in place and maintained. • Appropriate refuelling procedures and equipment will be used to prevent spills to the marine environment.
Introduction of invasive marine species	<ul style="list-style-type: none"> • All vessels will be assessed and managed as appropriate to prevent the introduction of invasive marine species. • Compliance with Australian biosecurity requirements and guidance. • Contracted vessels comply with Australian ballast water requirements.
Marine fauna interactions	<ul style="list-style-type: none"> • Measures will be taken to protect marine fauna and ecosystems from vessel activities and to prevent vessel collisions and groundings. • Maintaining dedicated marine fauna observers throughout the survey. • All marine fauna sightings are recorded and reported to the Department of Agriculture, Water and the Environment.

Providing Feedback

Our intent is to minimise environmental and social impacts associated with the proposed activities, and we are seeking any interest or comments you may have to inform our decision making. If you would like to comment on the proposed activities outlined in this information sheet, or would like additional information, please contact Woodside before 14 June 2021.

Please note that your feedback and our response will be included in our Environment Plan for the proposed activity, which will be submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan for this information to remain confidential to NOPSEMA.

Ryan Felton, Senior Corporate Affairs Adviser Woodside Energy Ltd
E: Feedback@woodside.com.au | Toll free: 1800 442 977

Please note that stakeholder feedback will be communicated to NOPSEMA as required under legislation. Woodside will communicate any material changes to the proposed activity to affected stakeholders as they arise.

www.woodside.com.au



Activity	Details
Sound source size	-3,150 in ³

Communications with mariners

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

The seismic vessel will be actively acquiring seismic data within the Operational Area determined for these activities. Marine notices will be issued prior to the start of work to alert vessels that maybe operating in waters nearby and that access to these areas may be limited.

Woodside will provide updates on vessel movements and their details during the activities in the form of look ahead reports at an appropriate frequency to meet relevant stakeholder needs.

The location of the Active Source Area and Operational Area are outlined in Table 3.

Table 3 - Survey location

Location point	
Latitude	Longitude
Active Source Area	
20°16'59.043"S	113°6'0.387"E
20°147.096"S	112°44'50.156"E
19°28'31.503"S	113°7'47.431"E
19°26'15.236"S	113°11'12.497"E
19°19'55.308"S	113°30'40.293"E
19°27'20.645"S	113°46'53.197"E
19°49'26.264"S	113°32'44.0"E
Operational Area	
20°24'2.0"S	113°6'45.162"E
19°59'57.873"S	112°36'7.851"E
19°20'39.38"S	113°6'41.252"E
19°13'25.19"S	113°33'49.172"E
19°29'41.467"S	113°5'4'32.011"E
19°40'50.544"S	113°44'44.882"E
19°54'42.118"S	113°37'40.185"E
20°6'2.873"S	113°23'11.168"E
20°6'31.786"S	113°22'13.473"E

Implications for Stakeholders

In support of the proposed activities, Woodside will consult relevant stakeholders whose interests, functions and activities may be affected by the proposed activities. We will also keep other stakeholders who have identified an interest informed about our planned activities.

Woodside has undertaken an assessment to identify potential risks to the marine environment and relevant stakeholders, considering timing, duration, location, and potential impacts arising from the Scarborough 4D Baseline Marine Seismic Survey.

A number of mitigation and management measures will be implemented and are summarised below.

Further details will be provided in the EP.

1.2 Email sent to ABF (13 May 2021)

Dear Stakeholder

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

<i>Summary:</i>	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Vessels:</i>	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.3 Email sent to AFMA (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

We have identified potential impacts to commercial fishers and the environment and have endeavoured to reduce these risks to as low as reasonably practicable. Fisheries have been identified as being relevant based on fishing area overlap with the activity area, assessment of government fishing effort data from recent years, fishing methods and water depth. It is highly unlikely the proposed activity will cause significant impacts to fish spawning and recruitment in any key commercial fish species due to underwater noise. Acquisition of the survey will not overlap the peak spawning season for key target species in the region, such as ruby snapper (December to April). Impacts to fish eggs and larvae are not likely due to the short duration of the survey, and lack of overlap with the peak spawning season.

An information sheet (also on our [website](#)), and map of relevant fisheries and list of previous surveys are attached.

Activity:

<i>Summary:</i>	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Relevant fisheries</i>	Commonwealth - Western Deepwater Trawl Fishery

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Potential risks to commercial fishing and proposed mitigation measures:

Potential Risk and/or Impact	Mitigation and/or Management Measure
Planned activities	
Interests of relevant stakeholders with respect to: <ul style="list-style-type: none"> Defence activities Petroleum activities Commercial fishing activities Shipping activities Infrastructure activities 	<ul style="list-style-type: none"> Consultation with petroleum titleholders, commercial fishers and their representative organisations, and government departments and agencies to inform decision making for the proposed activity and development of the EP. Advice to relevant stakeholders prior to the commencement of activities. Ongoing consultation by way of updates on vessel movements during survey activities at a frequency to meet relevant stakeholder needs.
Marine discharges	<ul style="list-style-type: none"> All routine marine discharges will be managed according to legislative and regulatory requirements and Woodside's Environmental Performance Standards.
Underwater noise	<ul style="list-style-type: none"> Implementation of <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Policy Statement 2.1. Noise modelling to inform potential impacts and input to mitigation and management measures.
Vessel interaction	<ul style="list-style-type: none"> Woodside will notify relevant fishery stakeholders and Government maritime safety agencies of specific start and end dates, specific vessel-on-location dates, and any exclusion zones prior to commencement of the activity. A three nautical mile radius safe navigation area will be in place around the seismic vessel and streamers during seismic operations. The seismic vessel will display appropriate day shapes and lights to indicate the vessel is towing and is therefore restricted in its ability to manoeuvre. The streamers will tow surface tail buoys fitted with safe navigation devices A visual and radar watch will be maintained on the project vessel bridge at all times. A support vessel and a potential chase vessel will be on standby to direct any shipping traffic or commercial fishing vessels away from the seismic vessel and its towed equipment.
Waste management	<ul style="list-style-type: none"> Waste generated on the vessels will be managed in accordance with legislative requirements and a Waste Management Plan. Wastes will be managed and disposed of in a safe and environmentally responsible manner that prevents accidental loss to the environment.

	<ul style="list-style-type: none"> Wastes transported onshore will be sent to appropriate recycling or disposal facilities by a licensed waste contractor.
Unplanned activities	
Hydrocarbon release	<ul style="list-style-type: none"> Appropriate spill response plans, equipment and materials will be in place and maintained. Appropriate refuelling procedures and equipment will be used to prevent spills to the marine environment.
Introduction of invasive marine species	<ul style="list-style-type: none"> All vessels will be assessed and managed as appropriate to prevent the introduction of invasive marine species. Compliance with Australian biosecurity requirements and guidance. Contracted vessels comply with Australian ballast water requirements.
Marine fauna interactions	<ul style="list-style-type: none"> Measures will be taken to protect marine fauna and ecosystems from vessel activities and to prevent vessel collisions and groundings. Maintaining dedicated marine fauna observers throughout the survey. All marine fauna sightings are recorded and reported to the Department of Agriculture, Water and the Environment.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

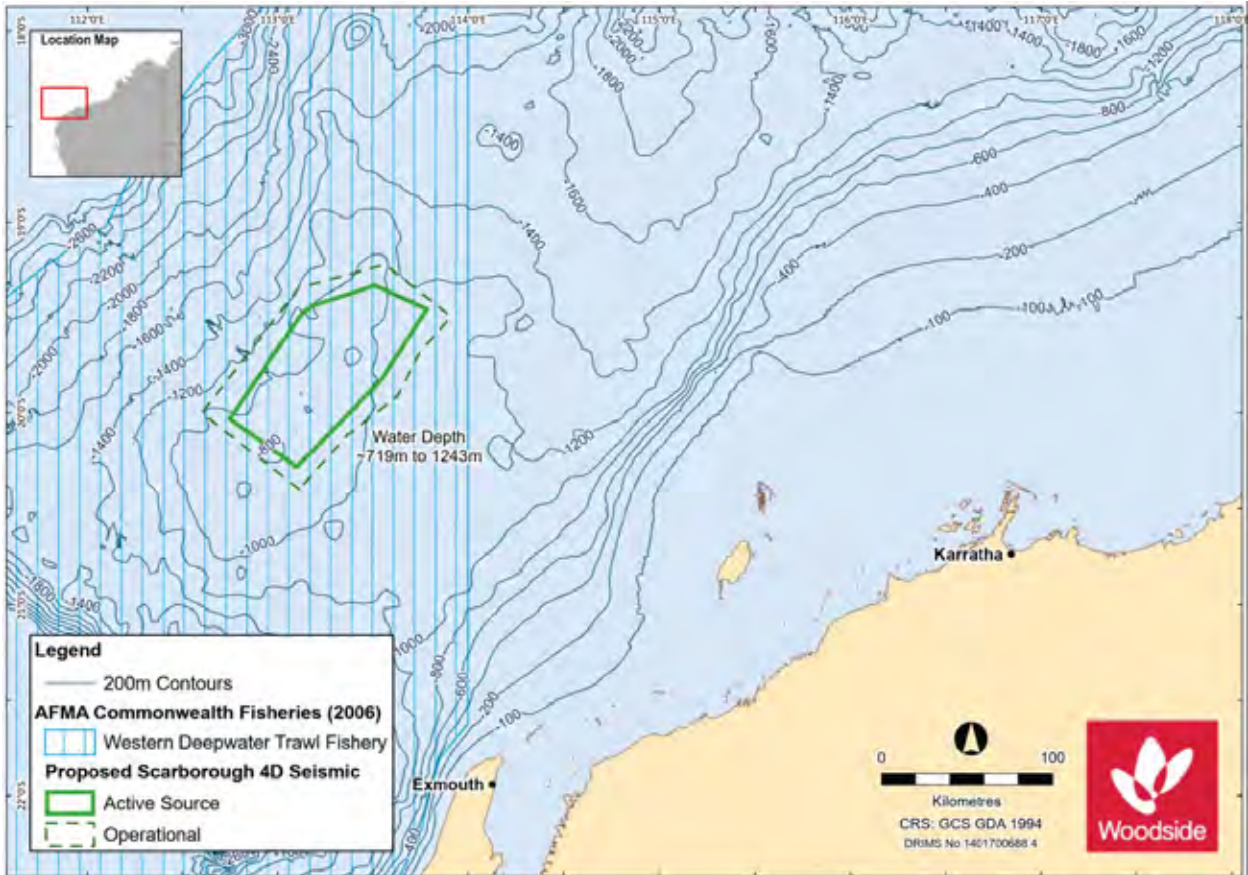
Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **14 June 2021**.

Regards



Scarborough 4D B1 Marine Seismic Survey Environment Plan



Previous seismic surveys

SURVEY	2D/3D	YEAR
Scarborough 3D MSS	3D	2004
HEX03A Scarborough 3D MS	3D	2004
Bonaventure 3D MSS	3D	2006
Hex07B Thebe 3D MSS	3D	2007
Keystone 2008 3D	3D	2008
Mary Rose MR11 3D	3D	2011
Mary Rose NE Extension MC3D MSS 2011-2012	3D	2012
Honeycombs 3D HC12	3D	2012
Honeycombs MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose Northeast 3D	3D	2012
Duvalia MC 2D MSS 2012	2D	2012
Westralia Span MC2D MSS	2D	2012
Westralian SPAN 2D	2D	2013
Northwest Shelf Renaissance 2D 2016	2D	2016

1.4 Email sent to AHO (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#). A map showing vessel density is also attached for reference.

Activity:

Summary:

The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Survey type:

Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Location:	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
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<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

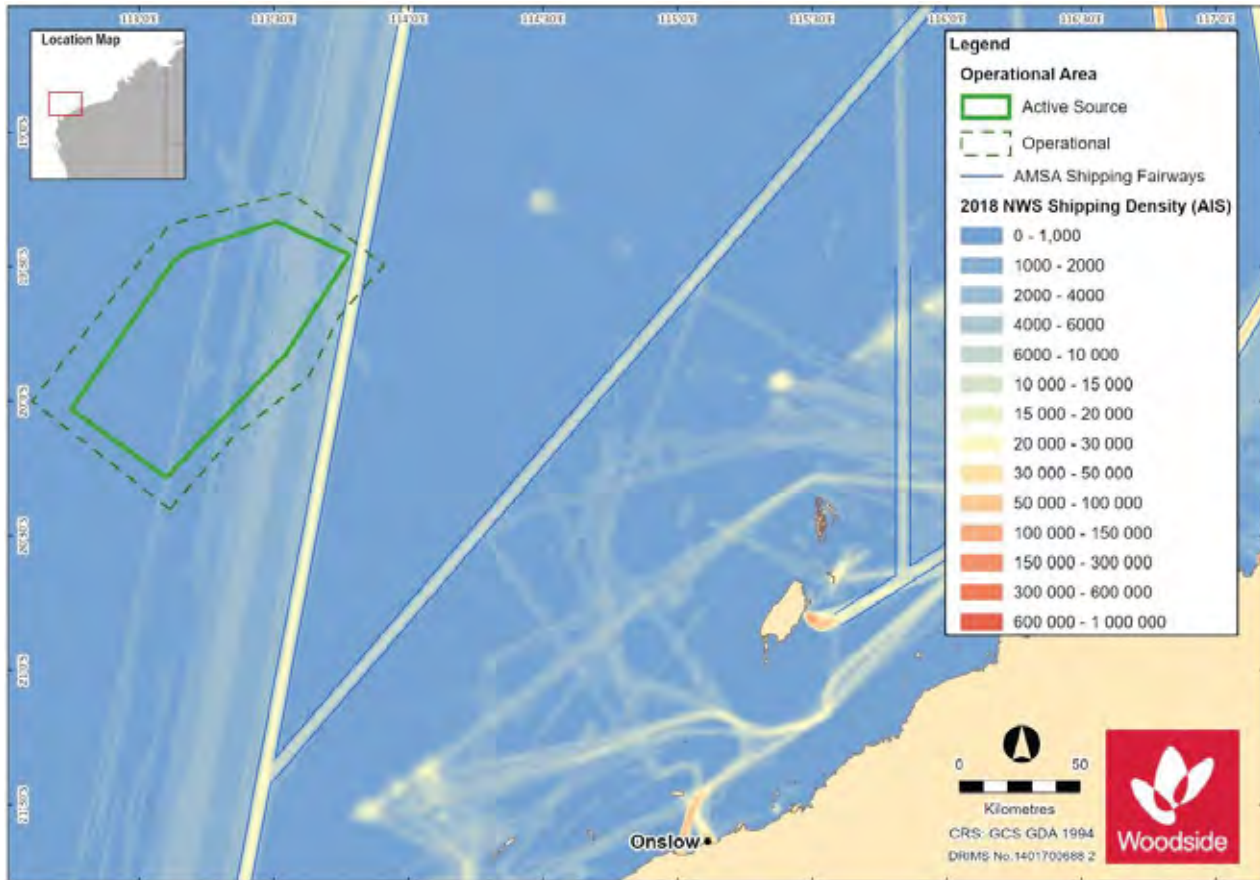
Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.5 Shipping lanes map sent to AHO and AMSA (13 May 2021)



1.6 Email sent to AMSA (Maritime Safety) (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#). A map showing vessel density is also attached for reference.

Activity:

Summary:

The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Vessels:</i>	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards

**1.7 Email sent to AMSA (Marine Pollution) (13 May 2021)**

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#). A map showing vessel density is also attached for reference.

Activity:

Summary:	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
Location:	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.8 Email sent to DCCEEW (13 May 2021)

Dear DAWE

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risk and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

Summary:	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
Location:	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Relevant fisheries	Commonwealth - Western Deepwater Trawl Fishery
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Implications for DAWE's interests

We have identified and assessed potential risks and impacts to active Commonwealth commercial fishers, biosecurity matters and the marine environment that overlap the proposed Operational Area in the development of the proposed Environment Plan for this activity.

Woodside has endeavoured to reduce these risks to an as low as reasonably practicable (ALARP) level.

Commercial fishing implications:

One Commonwealth-managed fishery has been identified as being relevant to the proposed Activity, this being the Western Deepwater Trawl Fishery.

Woodside will consult licence holders in this fishery, including the provision of a fact sheet specific to commercial fishing interests.

Fisheries were assessed for relevance on the basis of fishing licence overlap with the Operational Area, as well as consideration of government fishing effort data from recent years, fishing methods, and water depth.

Biosecurity implications:

With respect to the biosecurity matters, please note the following information below.

<i>Potential IMS risk</i>	<i>IMS mitigation management</i>
Introduction and establishment of IMS.	Vessels are required to comply with the Australian Biosecurity Act 2015, specifically the Australian Ballast Water Management Requirements (as defined under the Biosecurity Act 2015) (aligned with the International Convention for the Control and Management of Ships' Ballast Water and Sediments) to prevent introducing IMS. Vessels will be assessed and managed to prevent the introduction of invasive marine species in accordance with Woodside's Invasive Marine Species Management Plan. Woodside's Invasive Marine Species Management Plan includes a risk assessment process that is applied to vessels undertaking Activities. Based on the outcomes of each IMS risk assessment, Management measures commensurate with the risk (such as the treatment of internal systems, IMS inspections or cleaning) will be implemented to minimise the likelihood of IMS being introduced.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or +61 439 500 799.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth).

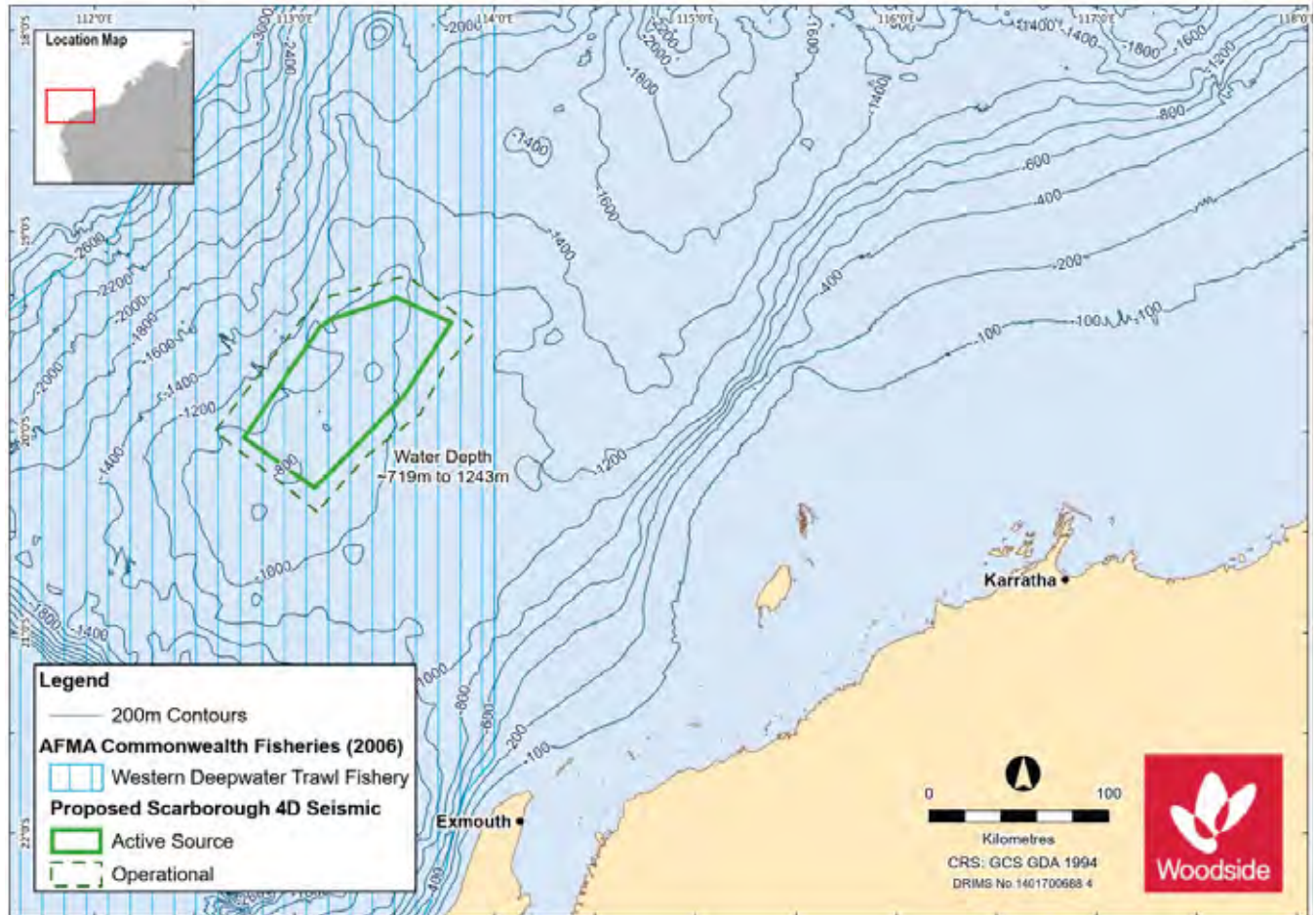
Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **14 June 2021**.

Regards



1.9 Fisheries map sent to DCCEEW (13 May 2021)



1.10 Email sent to DoD (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#). A map of practice and training defence areas is also attached.

Activity:

Summary:

The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
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Survey location:

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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

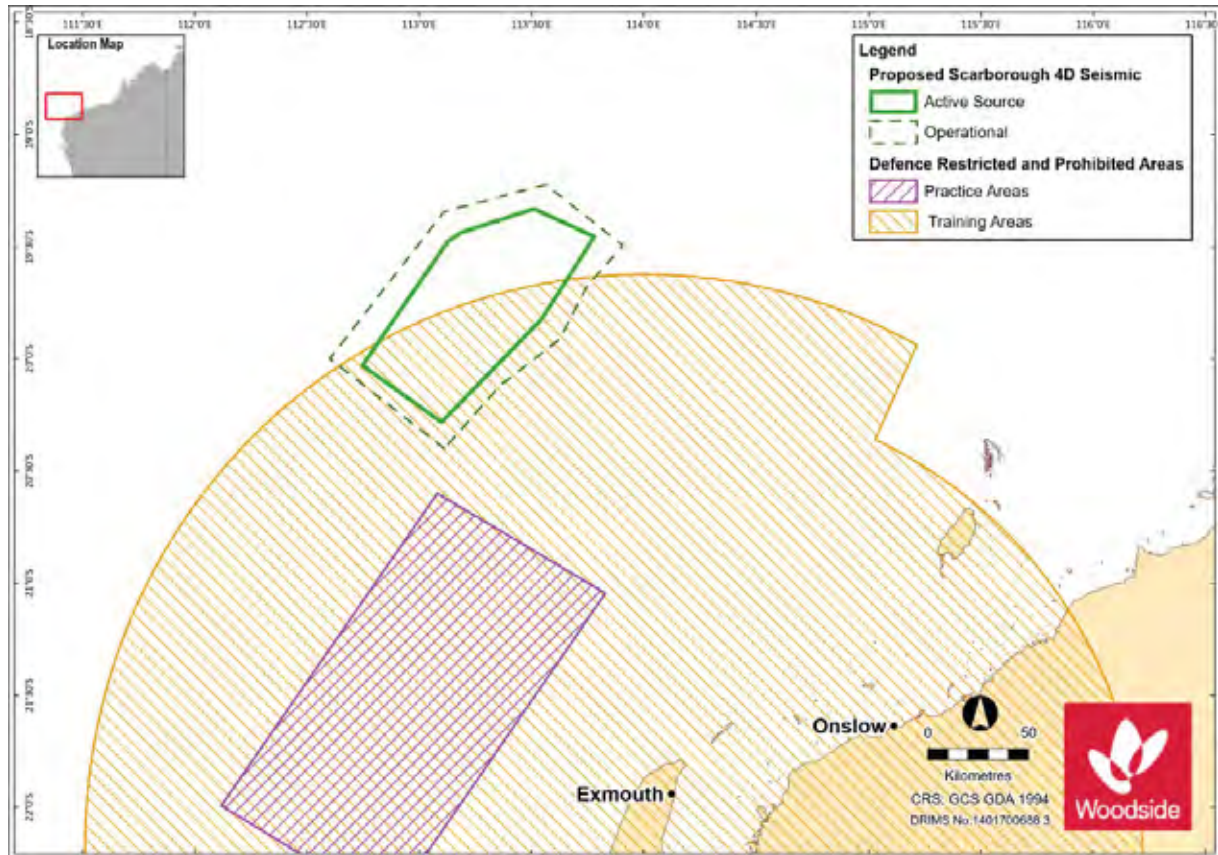
Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.11 Defence area map sent to DoD (13 May 2021)



1.12 Email sent to DISER (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

Summary:

The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
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Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.13 Email sent to DNP (13 May 2021)

Dear Director of National Parks

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

We would also be happy to meet online should you wish to discuss the proposed activity in more detail.

Implications for Parks Australia interests

We note Australian Government Guidance on consultation activities with respect to the proposed activities and confirm that:

- We have assessed potential impacts and risks to AMPs in the development of the proposed Environment Plan for this activity and believe that there are no credible impacts associated with planned activities that have potential to impact marine park values.
- In the unlikely event of a hydrocarbon release there is risk of hydrocarbons contacting the Montebello, Abrolhos, Carnarvon Canyon, Gascoyne and Ningaloo AMPs. The worst-case credible spill scenario assessed for this activity is a marine diesel oil spill resulting from the highly unlikely event of a vessel collision.
- A Commonwealth Government approved oil spill response plan will be in place for the duration of the activities, which includes notification to relevant agencies and organisations as to the nature and scale of the event, as soon as practicable following an occurrence. The Director of National Parks will be advised if an environmental incident occurs that may impact on the values of a marine park.

A Consultation Information Sheet about the planned activity is attached, which provides background on the activity, including a summary of potential key risk and associated management measures. The Information Sheet is also available on our [website](#).

In line with Australian Government guidance on consultation with government agencies, can you please advise within 10 business days if you have any feedback on the proposed activity, noting that your feedback and our response will be included in an Environment Plan for consideration by the National Offshore Petroleum Safety and Environmental Management Authority, as is required under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth).

Comments can be made by email, letter or by phone.

Regards



1.14 Email sent to DMIRS (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

Summary:

The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
Location:	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards

**1.15 Email sent to DoT (13 May 2021)**

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

Summary:	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
Location:	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.16 Email sent to Chevron, Western Gas and ExxonMobil (13 May 2021)

Dear Stakeholder

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#). A map showing the proposed activity relevant to adjacent petroleum titles is also attached.

Activity:

<i>Summary:</i>	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Vessels:</i>	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards



1.17 Email sent to DBCA (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

<i>Summary:</i>	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Vessels:</i>	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards

1.18 Email sent to Western Deepwater Trawl (13 May 2021) (5 Licence Holders)

Dear Licence Holder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

We have identified potential impacts to commercial fishers and the environment and have endeavoured to reduce these risks to as low as reasonably practicable. Fisheries have been identified as being relevant based on fishing area overlap with the activity area, assessment of government fishing effort data from recent years, fishing methods and water depth. It is highly unlikely the proposed activity will cause significant impacts to fish spawning and recruitment in any key commercial fish species due to underwater noise. Acquisition of the survey will not overlap the peak spawning season for key target species in the region, such as ruby snapper (December to April). Impacts to fish eggs and larvae are not likely due to the short duration of the survey, and lack of overlap with the peak spawning season.

An information sheet (also on our [website](#)), and map of relevant fisheries and list of previous surveys are attached.

Activity:

<i>Summary:</i>	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Relevant fisheries	Commonwealth - Western Deepwater Trawl Fishery
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Potential risks to commercial fishing and proposed mitigation measures:

Potential Risk and/or Impact	Mitigation and/or Management Measure
Planned activities	
Interests of relevant stakeholders with respect to: <ul style="list-style-type: none"> Defence activities Petroleum activities Commercial fishing activities Shipping activities Infrastructure activities 	<ul style="list-style-type: none"> Consultation with petroleum titleholders, commercial fishers and their representative organisations, and government departments and agencies to inform decision making for the proposed activity and development of the EP. Advice to relevant stakeholders prior to the commencement of activities. Ongoing consultation by way of updates on vessel movements during survey activities at a frequency to meet relevant stakeholder needs.
Marine discharges	<ul style="list-style-type: none"> All routine marine discharges will be managed according to legislative and regulatory requirements and Woodside's Environmental Performance Standards.
Underwater noise	<ul style="list-style-type: none"> Implementation of <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Policy Statement 2.1. Noise modelling to inform potential impacts and input to mitigation and management measures.
Vessel interaction	<ul style="list-style-type: none"> Woodside will notify relevant fishery stakeholders and Government maritime safety agencies of specific start and end dates, specific vessel-on-location dates, and any exclusion zones prior to commencement of the activity. A three nautical mile radius safe navigation area will be in place around the seismic vessel and streamers during seismic operations. The seismic vessel will display appropriate day shapes and lights to indicate the vessel is towing and is therefore restricted in its ability to manoeuvre. The streamers will tow surface tail buoys fitted with safe navigation devices A visual and radar watch will be maintained on the project vessel bridge at all times. A support vessel and a potential chase vessel will be on standby to direct any shipping traffic or commercial fishing vessels away from the seismic vessel and its towed equipment.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Waste management	<ul style="list-style-type: none"> • Waste generated on the vessels will be managed in accordance with legislative requirements and a Waste Management Plan. • Wastes will be managed and disposed of in a safe and environmentally responsible manner that prevents accidental loss to the environment. • Wastes transported onshore will be sent to appropriate recycling or disposal facilities by a licensed waste contractor.
Unplanned activities	
Hydrocarbon release	<ul style="list-style-type: none"> • Appropriate spill response plans, equipment and materials will be in place and maintained. • Appropriate refuelling procedures and equipment will be used to prevent spills to the marine environment.
Introduction of invasive marine species	<ul style="list-style-type: none"> • All vessels will be assessed and managed as appropriate to prevent the introduction of invasive marine species. • Compliance with Australian biosecurity requirements and guidance. • Contracted vessels comply with Australian ballast water requirements.
Marine fauna interactions	<ul style="list-style-type: none"> • Measures will be taken to protect marine fauna and ecosystems from vessel activities and to prevent vessel collisions and groundings. • Maintaining dedicated marine fauna observers throughout the survey. • All marine fauna sightings are recorded and reported to the Department of Agriculture, Water and the Environment.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

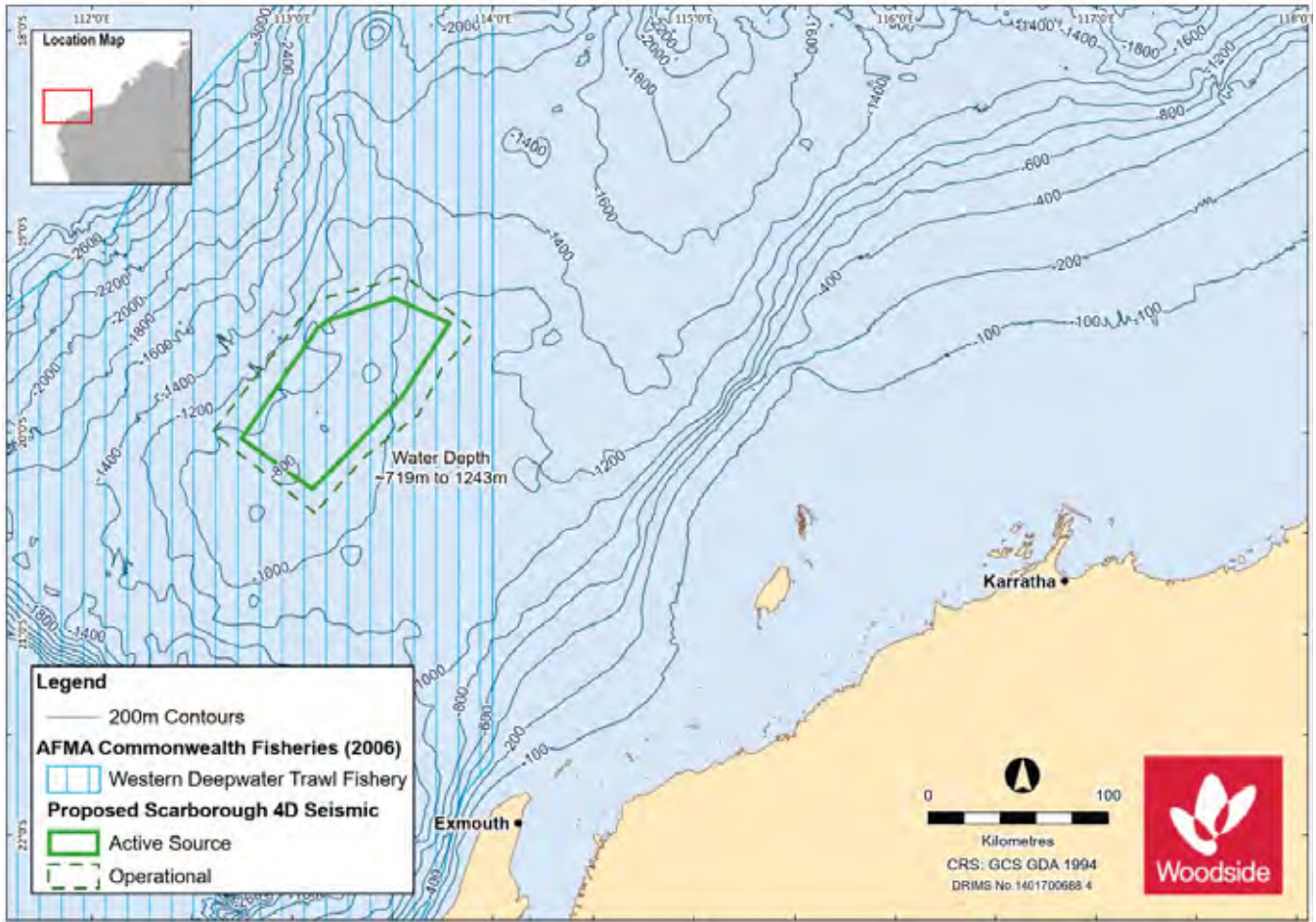
Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **14 June 2021**.

Regards

Scarborough 4D B1 Marine Seismic Survey Environment Plan



Previous seismic surveys

SURVEY	2D/3D	YEAR
Scarborough 3D MSS	3D	2004
HEX03A Scarborough 3D MS	3D	2004
Bonaventure 3D MSS	3D	2006
Hex07B Thebe 3D MSS	3D	2007
Keystone 2008 3D	3D	2008
Mary Rose MR11 3D	3D	2011
Mary Rose NE Extension MC3D MSS 2011-2012	3D	2012
Honeycombs 3D HC12	3D	2012
Honeycombs MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose Northeast 3D	3D	2012
Duvalia MC 2D MSS 2012	2D	2012
Westralia Span MC2D MSS	2D	2012
Westralian SPAN 2D	2D	2013
Northwest Shelf Renaissance 2D 2016	2D	2016

1.19 Email sent to Commonwealth Fisheries Association (CFA) (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

We have identified potential impacts to commercial fishers and the environment and have endeavoured to reduce these risks to as low as reasonably practicable. Fisheries have been identified as being relevant based on fishing area overlap with the activity area, assessment of government fishing effort data from recent years, fishing methods and water depth. It is highly unlikely the proposed activity will cause significant impacts to fish spawning and recruitment in any key commercial fish species due to underwater noise. Acquisition of the survey will not overlap the peak spawning season for key target species in the region, such as ruby snapper (December to April). Impacts to fish eggs and larvae are not likely due to the short duration of the survey, and lack of overlap with the peak spawning season.

An information sheet (also on our [website](#)), and map of relevant fisheries and list of previous surveys are attached.

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and

assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
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Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Relevant fisheries	Commonwealth - Western Deepwater Trawl Fishery
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Potential risks to commercial fishing and proposed mitigation measures:

Potential Risk and/or Impact	Mitigation and/or Management Measure
Planned activities	
Interests of relevant stakeholders with respect to: <ul style="list-style-type: none"> Defence activities Petroleum activities Commercial fishing activities Shipping activities Infrastructure activities 	<ul style="list-style-type: none"> Consultation with petroleum titleholders, commercial fishers and their representative organisations, and government departments and agencies to inform decision making for the proposed activity and development of the EP. Advice to relevant stakeholders prior to the commencement of activities. Ongoing consultation by way of updates on vessel movements during survey activities at a frequency to meet relevant stakeholder needs.
Marine discharges	<ul style="list-style-type: none"> All routine marine discharges will be managed according to legislative and regulatory requirements and Woodside's Environmental Performance Standards.
Underwater noise	<ul style="list-style-type: none"> Implementation of <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Policy Statement 2.1. Noise modelling to inform potential impacts and input to mitigation and management measures.
Vessel interaction	<ul style="list-style-type: none"> Woodside will notify relevant fishery stakeholders and Government maritime safety agencies of specific start and end dates, specific vessel-on-location dates, and any exclusion zones prior to commencement of the activity.

	<ul style="list-style-type: none"> • A three nautical mile radius safe navigation area will be in place around the seismic vessel and streamers during seismic operations. • The seismic vessel will display appropriate day shapes and lights to indicate the vessel is towing and is therefore restricted in its ability to manoeuvre. • The streamers will tow surface tail buoys fitted with safe navigation devices • A visual and radar watch will be maintained on the project vessel bridge at all times. • A support vessel and a potential chase vessel will be on standby to direct any shipping traffic or commercial fishing vessels away from the seismic vessel and its towed equipment.
Waste management	<ul style="list-style-type: none"> • Waste generated on the vessels will be managed in accordance with legislative requirements and a Waste Management Plan. • Wastes will be managed and disposed of in a safe and environmentally responsible manner that prevents accidental loss to the environment. • Wastes transported onshore will be sent to appropriate recycling or disposal facilities by a licensed waste contractor.
Unplanned activities	
Hydrocarbon release	<ul style="list-style-type: none"> • Appropriate spill response plans, equipment and materials will be in place and maintained. • Appropriate refuelling procedures and equipment will be used to prevent spills to the marine environment.
Introduction of invasive marine species	<ul style="list-style-type: none"> • All vessels will be assessed and managed as appropriate to prevent the introduction of invasive marine species. • Compliance with Australian biosecurity requirements and guidance. • Contracted vessels comply with Australian ballast water requirements.
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

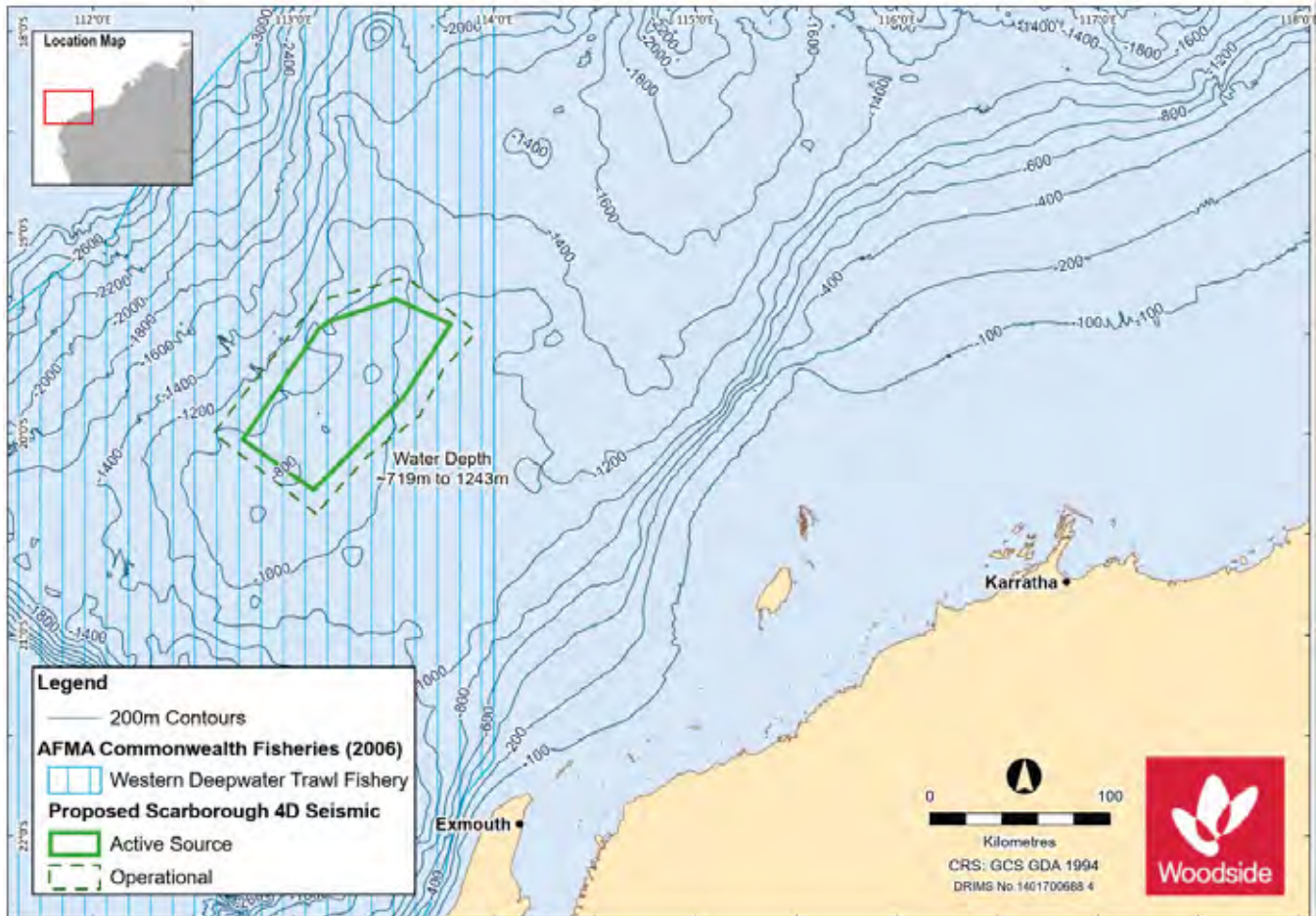
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Scarborough 4D B1 Marine Seismic Survey Environment Plan

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **14 June 2021**.

Regards



1.20 Email sent to WAFIC (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

We have identified potential impacts to commercial fishers and the environment and have endeavoured to reduce these risks to as low as reasonably practicable. Fisheries have been identified as being relevant based on fishing area overlap with the activity area, assessment of government fishing effort data from recent years, fishing methods and water depth. It is highly unlikely the proposed activity will cause significant impacts to fish spawning and recruitment in any key commercial fish species due to underwater noise. Acquisition of the survey will not overlap the peak spawning season for key target species in the region, such as ruby snapper (December to April). Impacts to fish eggs and larvae are not likely due to the short duration of the survey, and lack of overlap with the peak spawning season.

An information sheet (also on our [website](#)), and map of relevant fisheries and list of previous surveys are attached.

Activity:

Summary:	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
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Relevant fisheries	Commonwealth - Western Deepwater Trawl Fishery
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Potential risks to commercial fishing and proposed mitigation measures:

Potential Risk and/or Impact	Mitigation and/or Management Measure
Planned activities	
Interests of relevant stakeholders with respect to: <ul style="list-style-type: none"> Defence activities Petroleum activities Commercial fishing activities Shipping activities Infrastructure activities 	<ul style="list-style-type: none"> Consultation with petroleum titleholders, commercial fishers and their representative organisations, and government departments and agencies to inform decision making for the proposed activity and development of the EP. Advice to relevant stakeholders prior to the commencement of activities. Ongoing consultation by way of updates on vessel movements during survey activities at a frequency to meet relevant stakeholder needs.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Marine discharges	<ul style="list-style-type: none"> All routine marine discharges will be managed according to legislative and regulatory requirements and Woodside's Environmental Performance Standards.
Underwater noise	<ul style="list-style-type: none"> Implementation of <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Policy Statement 2.1. Noise modelling to inform potential impacts and input to mitigation and management measures.
Vessel interaction	<ul style="list-style-type: none"> Woodside will notify relevant fishery stakeholders and Government maritime safety agencies of specific start and end dates, specific vessel-on-location dates, and any exclusion zones prior to commencement of the activity. A three nautical mile radius safe navigation area will be in place around the seismic vessel and streamers during seismic operations. The seismic vessel will display appropriate day shapes and lights to indicate the vessel is towing and is therefore restricted in its ability to manoeuvre. The streamers will tow surface tail buoys fitted with safe navigation devices A visual and radar watch will be maintained on the project vessel bridge at all times. A support vessel and a potential chase vessel will be on standby to direct any shipping traffic or commercial fishing vessels away from the seismic vessel and its towed equipment.
Waste management	<ul style="list-style-type: none"> Waste generated on the vessels will be managed in accordance with legislative requirements and a Waste Management Plan. Wastes will be managed and disposed of in a safe and environmentally responsible manner that prevents accidental loss to the environment. Wastes transported onshore will be sent to appropriate recycling or disposal facilities by a licensed waste contractor.
Unplanned activities	
Hydrocarbon release	<ul style="list-style-type: none"> Appropriate spill response plans, equipment and materials will be in place and maintained. Appropriate refuelling procedures and equipment will be used to prevent spills to the marine environment.
Introduction of invasive marine species	<ul style="list-style-type: none"> All vessels will be assessed and managed as appropriate to prevent the introduction of invasive marine species. Compliance with Australian biosecurity requirements and guidance. Contracted vessels comply with Australian ballast water requirements.
Marine fauna interactions	<ul style="list-style-type: none"> Measures will be taken to protect marine fauna and ecosystems from vessel activities and to prevent vessel collisions and groundings. Maintaining dedicated marine fauna observers throughout the survey.

- All marine fauna sightings are recorded and reported to the Department of Agriculture, Water and the Environment.

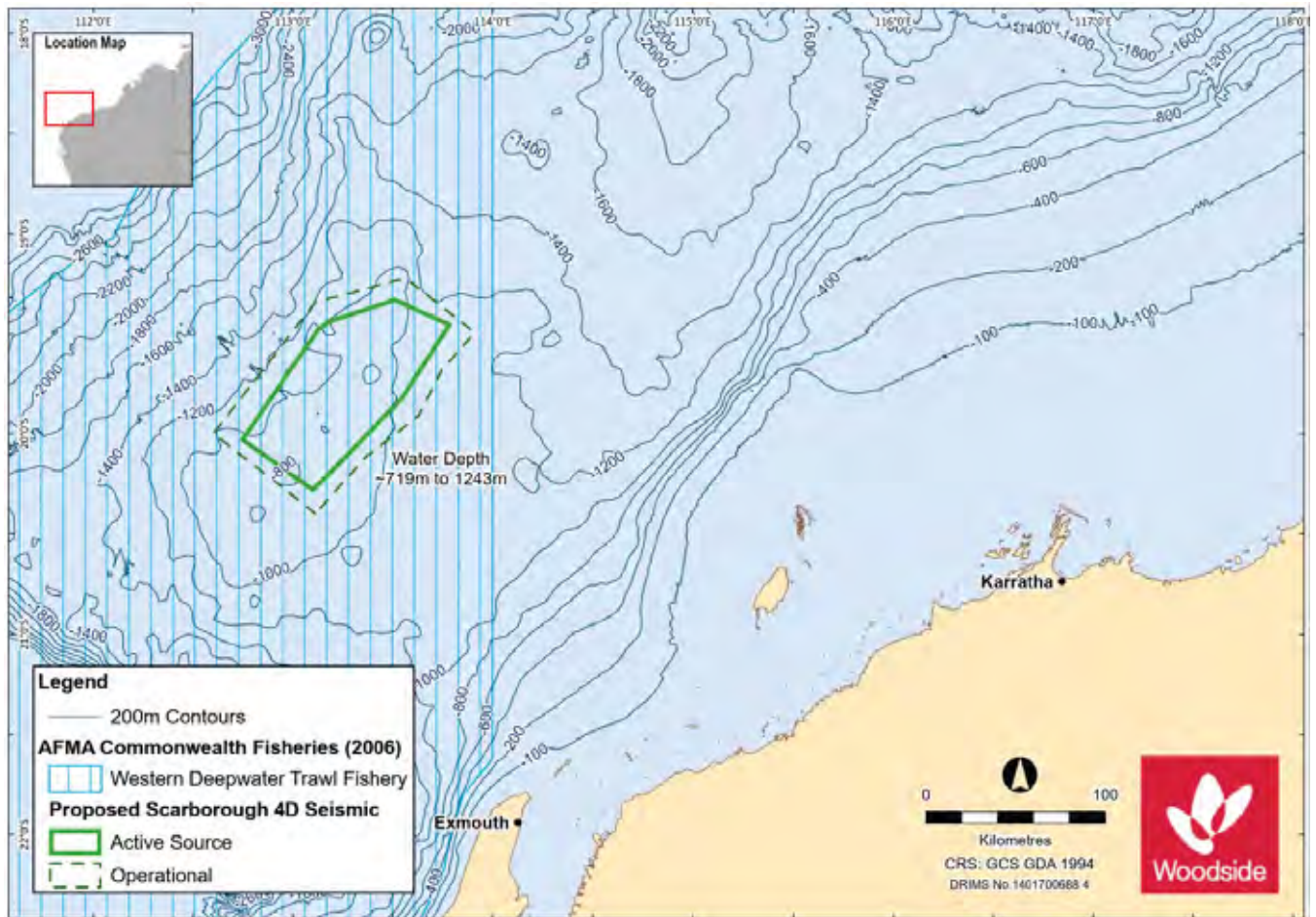
Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **14 June 2021**.
Regards

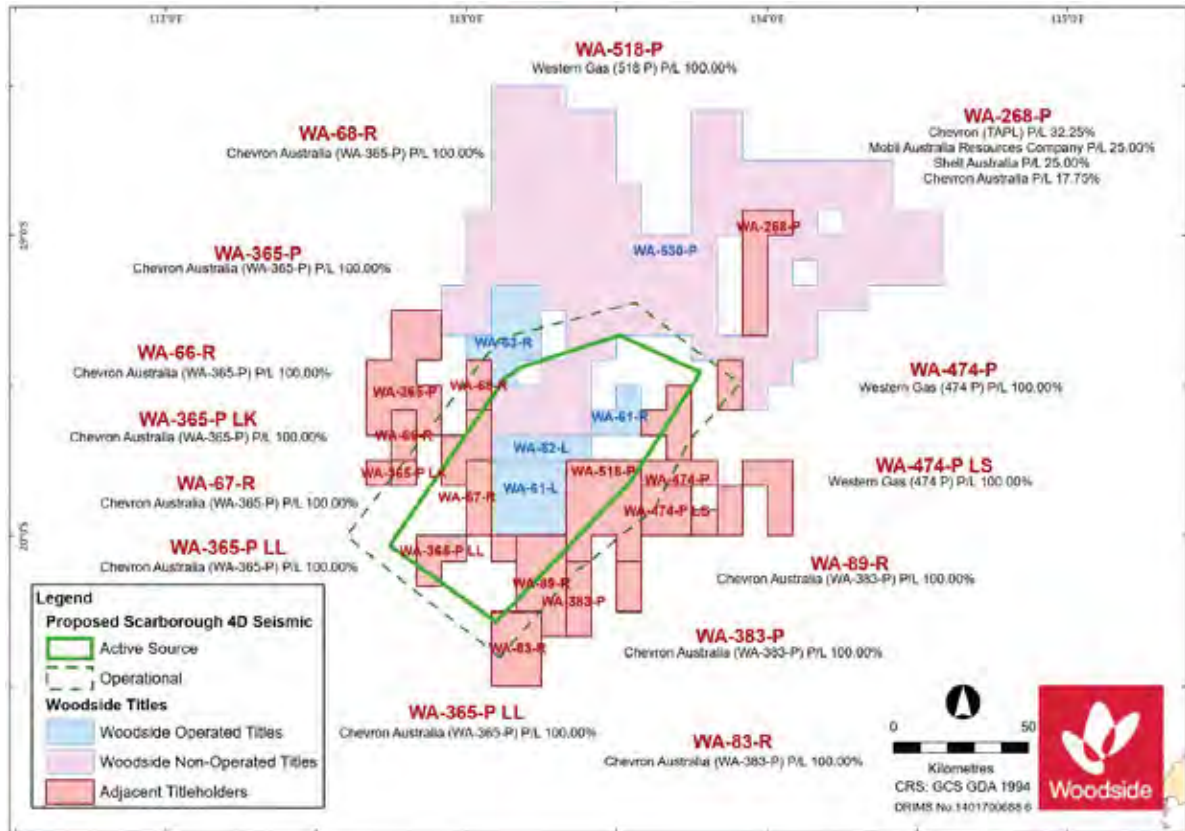


Scarborough 4D B1 Marine Seismic Survey Environment Plan

Previous seismic surveys

SURVEY	2D/3D	YEAR
Scarborough 3D MSS	3D	2004
HEX03A Scarborough 3D MS	3D	2004
Bonaventure 3D MSS	3D	2006
Hex07B Thebe 3D MSS	3D	2007
Keystone 2008 3D	3D	2008
Mary Rose MR11 3D	3D	2011
Mary Rose NE Extension MC3D MSS 2011-2012	3D	2012
Honeycombs 3D HC12	3D	2012
Honeycombs MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose Northeast 3D	3D	2012
Duvalia MC 2D MSS 2012	2D	2012
Westralia Span MC2D MSS	2D	2012
Westralian SPAN 2D	2D	2013
Northwest Shelf Renaissance 2D 2016	2D	2016

1.21 Adjacent Titleholders map sent to Chevron, Western Gas, ExxonMobil and Shell (13 May 2021)



1.22 Email sent to Shell (13 May 2021)

Dear [REDACTED]

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#). A map showing the proposed activity relevant to adjacent petroleum titles is also attached.

Activity:

Summary:

The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Vessels:</i>	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.
Regards

1.23 Email sent to APPEA (13 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

An Environment Plan for this activity will be submitted in accordance with the the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet is also available on our [website](#).

Activity:

Summary:	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
Location:	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Around Q3 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by 14 June 2021.

Regards

1.24 Email sent to DPIRD (14 May 2021)

Dear Stakeholder

Woodside is planning to submit an Environment Plan for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The activity is planned to commence in Q3 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

We have identified potential impacts to commercial fishers and the environment and have endeavoured to reduce these risks to as low as reasonably practicable. Fisheries have been identified as being relevant based on fishing area overlap with the activity area, assessment of government fishing effort data from recent years, fishing methods and water depth. It is highly unlikely the proposed activity will cause significant impacts to fish spawning and recruitment in any key commercial fish species due to underwater noise. Acquisition of the survey will not overlap the peak spawning season for key target species in the region, such as ruby snapper (December to April). Impacts to fish eggs and larvae are not likely due to the short duration of the survey, and lack of overlap with the peak spawning season.

An information sheet (also on our [website](#)), and map of relevant fisheries and list of previous surveys are attached.

Activity:

<i>Summary:</i>	The purpose of the survey is to improve data quality and subsurface imaging within the permit, allowing Woodside to define new and existing leads and assess commerciality of potential hydrocarbon accumulations. The survey is part of Woodside's work program commitments for the permit.
<i>Survey type:</i>	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel. Woodside is also considering using a small fleet of autonomous ocean bottom seismic nodes (AUV nodes) that will also record the reflected energy over a localised area.
<i>Location:</i>	214 km north-west of Exmouth; Latitude 20°16'59.043", Longitude 113°6'0.387"E
<i>Approximate Water Depth (m):</i>	800 m – 1150 m
<i>Schedule:</i>	Around Q3 2022
<i>Duration:</i>	Around 55 days - 70 days
<i>Relevant fisheries</i>	Commonwealth - Western Deepwater Trawl Fishery
<i>Vessels:</i>	A purpose-built seismic vessel, one support vessel and a potential chase vessel
<i>Safe navigation zone (cautionary area)</i>	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Potential risks to commercial fishing and proposed mitigation measures:

Potential Risk and/or Impact	Mitigation and/or Management Measure
Planned activities	
Interests of relevant stakeholders with respect to: <ul style="list-style-type: none"> • Defence activities • Petroleum activities • Commercial fishing activities • Shipping activities • Infrastructure activities 	<ul style="list-style-type: none"> • Consultation with petroleum titleholders, commercial fishers and their representative organisations, and government departments and agencies to inform decision making for the proposed activity and development of the EP. • Advice to relevant stakeholders prior to the commencement of activities. • Ongoing consultation by way of updates on vessel movements during survey activities at a frequency to meet relevant stakeholder needs.
Marine discharges	<ul style="list-style-type: none"> • All routine marine discharges will be managed according to legislative and regulatory requirements and Woodside's Environmental Performance Standards.
Underwater noise	<ul style="list-style-type: none"> • Implementation of <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Policy Statement 2.1. • Noise modelling to inform potential impacts and input to mitigation and management measures.
Vessel interaction	<ul style="list-style-type: none"> • Woodside will notify relevant fishery stakeholders and Government maritime safety agencies of specific start and end dates, specific vessel-on-location dates, and any exclusion zones prior to commencement of the activity. • A three nautical mile radius safe navigation area will be in place around the seismic vessel and streamers during seismic operations. • The seismic vessel will display appropriate day shapes and lights to indicate the vessel is towing and is therefore restricted in its ability to manoeuvre. • The streamers will tow surface tail buoys fitted with safe navigation devices • A visual and radar watch will be maintained on the project vessel bridge at all times. • A support vessel and a potential chase vessel will be on standby to direct any shipping traffic or commercial fishing vessels away from the seismic vessel and its towed equipment.
Waste management	<ul style="list-style-type: none"> • Waste generated on the vessels will be managed in accordance with legislative requirements and a Waste Management Plan. • Wastes will be managed and disposed of in a safe and environmentally responsible manner that prevents accidental loss to the environment. • Wastes transported onshore will be sent to appropriate recycling or disposal facilities by a licensed waste contractor.
Unplanned activities	
Hydrocarbon release	<ul style="list-style-type: none"> • Appropriate spill response plans, equipment and materials will be in place and maintained. • Appropriate refuelling procedures and equipment will be used to prevent spills to the marine environment.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Introduction of invasive marine species	<ul style="list-style-type: none"> • All vessels will be assessed and managed as appropriate to prevent the introduction of invasive marine species. • Compliance with Australian biosecurity requirements and guidance. • Contracted vessels comply with Australian ballast water requirements.
Marine fauna interactions	<ul style="list-style-type: none"> • Measures will be taken to protect marine fauna and ecosystems from vessel activities and to prevent vessel collisions and groundings. • Maintaining dedicated marine fauna observers throughout the survey. • All marine fauna sightings are recorded and reported to the Department of Agriculture, Water and the Environment.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

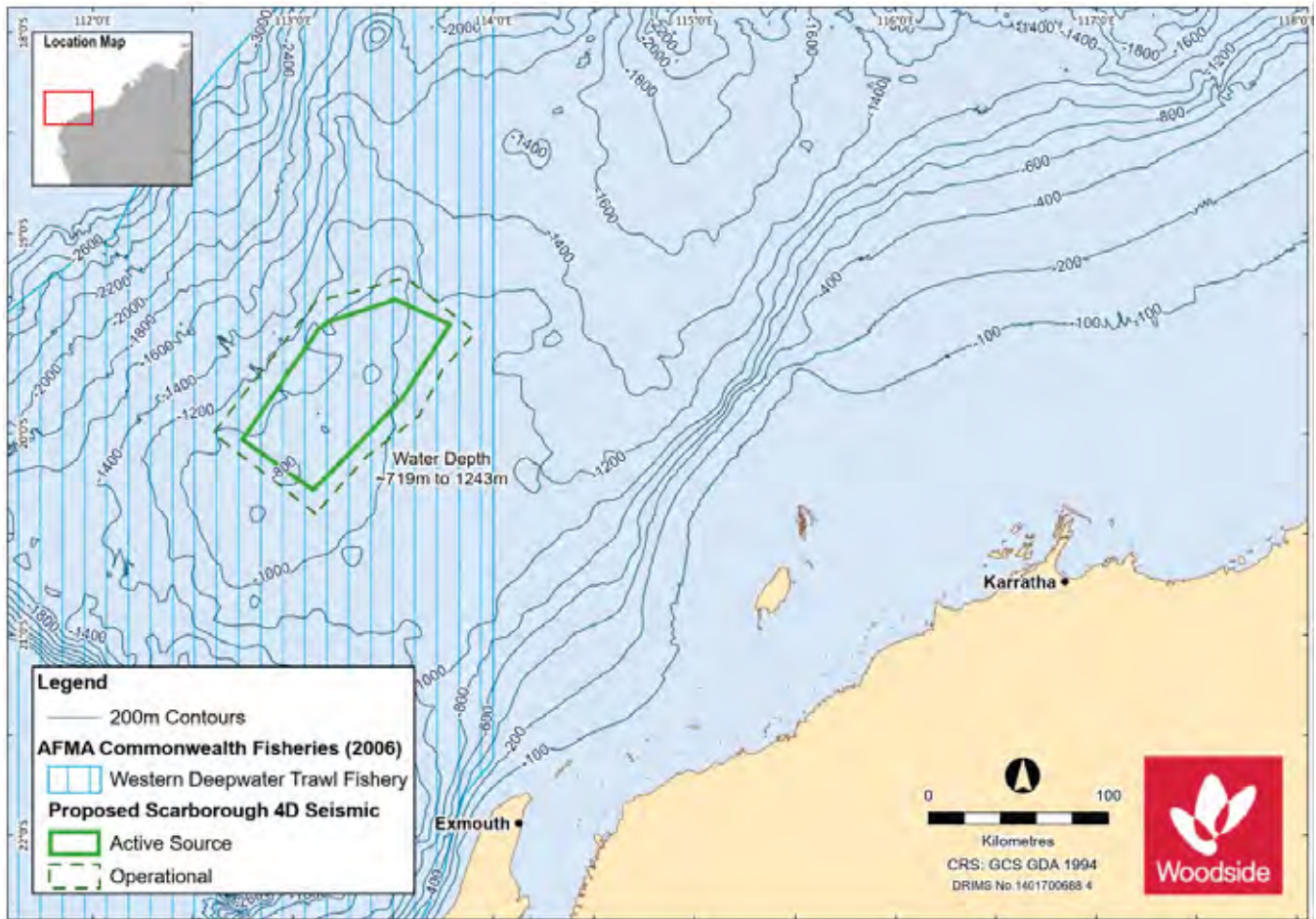
Your feedback and our response will be included in our Environment Plans, which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **14 June 2021**.

Regards

Scarborough 4D B1 Marine Seismic Survey Environment Plan



Previous seismic surveys

SURVEY	2D/3D	YEAR
Scarborough 3D MSS	3D	2004
HEX03A Scarborough 3D MS	3D	2004
Bonaventure 3D MSS	3D	2006
Hex07B Thebe 3D MSS	3D	2007
Keystone 2008 3D	3D	2008
Mary Rose MR11 3D	3D	2011
Mary Rose NE Extension MC3D MSS 2011-2012	3D	2012
Honeycombs 3D HC12	3D	2012
Honeycombs MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose MC3D	3D	2012
Mary Rose Northeast 3D	3D	2012
Duvalia MC 2D MSS 2012	2D	2012
Westralia Span MC2D MSS	2D	2012
Westralian SPAN 2D	2D	2013
Northwest Shelf Renaissance 2D 2016	2D	2016

1.25 Email sent to AMSA (Marine Pollution) (6 July 2021)

Dear [REDACTED]

As part of Woodside's ongoing consultation for its current and planned activities, I would like to advise Australian Maritime Safety Authority (AMSA) that Woodside are preparing the *Scarborough 4D Marine Seismic Survey Environment Plan* and would like to offer AMSA the opportunity to review or provide comment on the activity.

Information is presented as follows:

- A Consultation Information Sheet is available on our [website here](#), providing information on the proposed petroleum activities program. Please note that this is a joint Information Sheet with Angel Operations.
- The *Scarborough 4D Marine Seismic Survey First Strike Plan* is attached. This will form part of the approval submission in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Woodside propose to submit an EP on 27th August 2021 to support these activities.

Should you require additional information or have a comment to make about the proposed activity, please contact myself by close of business 21st August to allow us sufficient time to inform our activity planning and EP development.

Comments can be made by email, letter or by phone.

Please be aware that your feedback will be communicated to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), as is required under legislation.

We look forward to hearing from you.

Many thanks,

1.26 Email sent to DoT (8 July 2021)

Dear [REDACTED]

As part of Woodside's ongoing consultation for its current and planned activities, I would like to advise WA Department of Transport (DoT) that Woodside are preparing the *Scarborough 4D Marine Seismic Survey Environment Plan* and would like to offer DoT the opportunity to review or provide comment on the activity.

Information is presented as follows:

- A Consultation Information Sheet is available on our [website here](#), providing information on the proposed petroleum activities program. Please note that this is a joint Information Sheet with Angel Operations.
- The *Scarborough 4D Marine Seismic Survey First Strike Plan* is attached. This will form part of the approval submission in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).
- In the table below, as requested in the *Offshore Petroleum Industry Guidance Note* (July 2020) and from recent engagement activities with DoT and Woodside, responses to the information requirements in a succinct summary and source of information.

Woodside propose to submit an EP on 27th August 2021 to support these activities.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Should you require additional information or have a comment to make about the proposed activity, please contact myself by close of business 21st August to allow us sufficient time to inform our activity planning and EP development.

Comments can be made by email, letter or by phone.

Please be aware that your feedback will be communicated to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), as is required under legislation.

We look forward to hearing from you.

Many thanks,

Information Requested in the Offshore Petroleum Industry Guidance Note (July 2020)	Information Provided & Reference	
Description of activity, including the intended schedule, location (including coordinates), distance to nearest landfall and map.	Included in the consultation information sheet	
Worst case spill volumes.	Included in Appendix A of the First Strike Plan	
Known or indicative oil type/properties.	Included in Appendix A of the First Strike Plan	
Amenability of oil to dispersants and window of opportunity for dispersant efficacy.	Dispersant is not deemed to be suitable for marine diesel spill.	
Description of existing environment and protection priorities.	Included in section 4 of the First Strike Plan	
Details of the environmental risk assessment related to marine oil pollution - describe the process and key outcomes around risk identification, risk analysis, risk evaluation and risk treatment. For further information see the Oil Pollution Risk Management Information Paper (NOPSEMA 2017).	<p>Unplanned loss of containment events from the Petroleum Activities Program have been identified during the risk assessment process (presented in Section 7 of the EP). Further descriptions of risk, impacts and mitigation measures (which are not related to hydrocarbon preparedness and response) are provided in Section 7 of the EP. One unplanned event or credible spill scenario for the Petroleum Activities Program has been selected as representative across types, sources and incident/response levels, up to and including the WCCS.</p> <p>Table 2-1 of the OSPRMA presents the credible scenario for the Petroleum Activities Program. One worst-case credible scenario been used for response planning purposes for the activity as all other scenarios are of a lesser scale and extent. By demonstrating capability to meet and manage an event of this size and timescale, Woodside assumes relevant scenarios that are smaller in nature and scale can also be managed by the same capability.</p> <p>Response performance outcomes have been defined based on a response to the WCCS.</p>	
Outcomes of oil spill trajectory modelling, including predicted		Credible Scenario-01 – surface release of marine diesel after a vessel collision

times to enter State waters and contact shorelines.	2,000 m ³ marine diesel – residue of 100 m ³ (5%)
	Minimum time to shoreline contact (above 100 g/m ²) in days
	Shoreline receptors No contact
<i>Please note, no floating or shoreline impacts are predicted within State Waters, however, there may be some entrained contact at 10 ppb which enters State Waters on the Northwest Cape.</i>	
Details on initial response actions and key activation timeframes.	Included in Section 2 and 3 of the First Strike Plan
Potential Incident Control Centre arrangements.	Included in Appendix E and F of the First Strike Plan
Potential staging areas / Forward Operating Base.	A Forward Operating Base can be established at Exmouth and/ or Dampier.
Details on response strategies.	Included in Section 2 and 3 of the First Strike Plan
Use of DoT equipment resources	Woodside has access to its own and contracted stockpiles of response equipment and acknowledges that potential use of DoT resources cannot be assumed and is at the discretion of DoT.
Details and diagrams on proposed IMT structure including integration of DoT arrangements as per this IGN.	Included in Appendix E and F of the First Strike Plan
Details on testing of arrangements of OPEP/OSCP.	<ul style="list-style-type: none"> One Level 1 'First Strike' drill conducted within two weeks of activity commencement. <p>Testing of Oil Spill Response Arrangements</p> <p>There are a number of arrangements which in the event of a spill will underpin Woodside's ability to implement a response across its petroleum activities. In order to ensure each of these arrangements is adequately tested, the Hydrocarbon Spill Preparedness Capability and Competency Coordinator ensures tests are conducted in alignment with the Hydrocarbon Spill Arrangements Testing Schedule (Woodside Doc No. 10058092).</p> <p>Woodside's Hydrocarbon Spill Preparedness & Response Testing Schedule aligns with international good practice for spill preparedness & response management; the testing is compatible with the IPIECA Good Practice Guide and the Australian Emergency Management Institute Handbook.</p> <p>The Hydrocarbon Spill Arrangements Testing Schedule (Woodside Doc No. 10058092) identifies the type of test which will be conducted annually for each arrangement, and how this type will vary over a five year rolling schedule. Testing methods may include (but are not limited to): audits, drills, field exercises, functional workshops, assurance</p>

	<p>reporting, assurance monitoring and reviews of key external dependencies.</p> <p>Activity specific Oil Spill Pollution First Strike Plans are developed to meet the response needs of that particular activity's Worst Credible Spill Scenario (WCCS). The ability to implement these plans may rely on specific arrangements or those common to other Woodside activities. Regardless of their commonality each arrangement will be tested in at least one of the methods annually. This ensures that personnel are familiar with spill response procedures, reporting requirements, and roles/ responsibilities.</p> <p>At the completion of testing a report is produced to demonstrate the outcomes achieved against the tested objectives. The report will include the lessons learned, any improvement actions and a list of the participants. Alternatively, an assurance report, assurance records, or audit report may be produced. These reports record findings and include any recommendations for improvement. Improvement actions and their close-out are actively recorded and managed.</p> <p>This is over and above the emergency management exercises conducted.</p>
Additional comments	Please note some of the links in the document are still being finalised, and as such may show a reference error in the attached version.

1.27 Email sent to Market Forces (23 September 2022)

Dear [REDACTED]

This is a courtesy email reminder on the below and the attached consultation information regarding the Scarborough 4D B1 Marine Seismic Survey Environment Plan.

Woodside requests your response by Friday 30 September 2022. If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible and before 30 September 2022.

Kind Regards,

Woodside Feedback

1.28 Email sent to National Energy Resource Australia (NERA) (11 May 2022)

Hi [REDACTED], thanks for your email and apologies for my delay in responding.

I have attached some information regarding the Scarborough 4D B1 Marine Seismic Survey that was provided to other stakeholders during the consultation phase of the development of the Environment Plan (EP). The EP is currently under assessment by the regulator, which can be read on the NOSEMA website (https://info.nopsema.gov.au/environment_plans/559/show_public)

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Given the EP is in its final stages of assessment, stakeholder feedback at this time may not be able to be incorporated into the EP, but will be considered as necessary. I can also add you to our stakeholder list for any future relevant consultation regarding the activity.

Perhaps once you have had a chance to review the information it might be best to come back to me with any questions or additional information you may be seeking and I can pass this on to the relevant project team members. As you suggest, if you can pass me on the information regarding your CSEP project I can also direct this to the relevant focal points.

Kind Regards,

Attachment A: Detailed statement of response to Greenpeace Australia Pacific letter – 8 April 2022 (in relation to the activities the subject of the Scarborough 4D B1 Marine Seismic Survey EP)

GAP request for additional information	Woodside response
<p><i>11. Request for the following information, including any reports, analyses, assessments, modelling and/or other documents.</i></p> <p><i>11. a. A description of the environment that may be affected by the activities, including the potential extent and area of a Worst Case Oil Spill and gas leak.</i></p>	<p>WR1: The Environment that May be Affected (EMBA) has been determined based on the extent and area of the worst-case loss of containment scenario for the activity. This scenario is ~1062 m³ marine diesel spill from a vessel collision resulting in the rupture of a fuel tank, though the modeling has conservatively used 2000 m³ release to understand the potential EMBA.</p> <p>Figure 1 (below, at end of commentary and Figure 4-1 in the EP) presents the outputs of stochastic modelling for the worst-case loss of containment scenario. Noting that the EMBA presented does not represent the predicted coverage of any one hydrocarbon spill or a depiction of a slick or plume at any particular point in time. Rather, the areas are a composite of a large number of theoretical paths, integrated over the full duration of the simulations under various metocean conditions.</p> <p>There is no potential for a gas leak from this activity therefore it has not been considered throughout this request.</p>
<p><i>11. b. The potential environmental impacts and risks of the activities, including in relation to a Worst Case Oil Spill and gas leak.</i></p>	<p>WR2: Key impacts and risks are summarised in the consultation fact sheet which is publicly available on the Woodside website. A full list of the environmental aspects which have been impact and risk assessed in the Seismic EP (Section 6) is provided in Table 1 (below, at end of commentary and have been assessed in the EP).</p>
<p><i>11. c. The potential impacts and risks on any species listed under the Environment Protection and Biodiversity Conservation Act 1999 (Cth), including in relation to a Worst Case Oil Spill and gas leak.</i></p>	<p>WR3: Table 4-5, Table 4-7, Table 4-10 and Table 4-12 of the Seismic EP identify the EPBC species that may be present in the Operational Area and / or the EMBA. Section 6.6 and 6.7 of the EP provide an assessment of the impacts and potential risks on those identified EPBC species.</p>
<p><i>11.d The potential impacts and risks on the Scott Reef Marine Park, and any other significant marine ecosystem, including in relation to a Worst Case Oil Spill and gas leak.</i></p>	<p>WR4: Due to location of the activity and distance to Scott Reef Marine Park there are no potential impacts or risks. As detailed in WR1, the worst-case loss of containment scenario is restricted to the offshore environment with no shoreline contact. Receptors including any significant marine ecosystem are considered in the EMBA and are detailed in Section 6.7.2 of the Seismic EP.</p>
<p><i>11. e. The potential impacts and risks in relation to Sea Country and other areas of marine or terrestrial Aboriginal cultural significance and/or heritage, including in relation to a Worst Case Oil Spill and gas leak.</i></p>	<p>WR5: The closest landfall to the activity is the North West Cape, about 188 km south-south-east at its nearest point. This means the activity is offshore from the ancient coastline occupied by the people that first arrived in Australia some 65,000 years ago. At this time, sea levels were around 100 m lower than today. The First Australians occupied and exploited an evolving continental shelf</p>

	<p>landscape before sea level rose and stabilized around 7,000 years ago, flooding the cultural landscape that had been lived upon by thousands of generations of people.</p> <p>Similarly, the worst-case loss of containment scenario, represented by the EMBA, does not result in any shoreline contact and remains offshore from the ancient coastline. The existence of any unknown Aboriginal sites or artefacts of significance within the EMBA is therefore considered highly unlikely.</p>
<p>11. f. <i>The total greenhouse gas emissions associated with the activities and where these greenhouse gas emissions will occur, including any flaring/venting of greenhouse gas emissions both offshore and onshore.</i></p>	<p>WR6: Greenhouse gas emissions which will be generated by the Seismic activities have been estimated based on data gathered from previous activities, standard factors and the most up to date planning available. The total GHG emissions for this activity have been included in the EP (Section 6.6.4) and have been determined to be approximately 30,000 ktCO₂e.</p> <p>The purpose of the Petroleum Activities program is the appraisal of the offshore Scarborough gas fields to help inform the optimised management of the hydrocarbon reserves. The Scarborough 4D B1 Marine Seismic Survey EP assesses both direct and indirect environmental impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not included in the Petroleum Activities Program for this EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of this Petroleum Activities Program but will be considered in relevant Scarborough EPs as appropriate.</p>
<p>11. g. <i>The potential impacts and risks of the activities' greenhouse gas emissions in relation to global warming and climate change, including whether and how those emissions would fit within a carbon budget and emissions reduction scenarios aligned with the temperature goals of the Paris Agreement, and specifically whether the Project can be accommodated within a carbon budget for a 1.5 degree, 1.8 degree or 2 degree warming scenario.</i></p>	<p>WR7: Not relevant for this activity</p>
<p>11. h. <i>The proposed greenhouse gas emissions control measures, including details of any proposed</i></p>	<p>WR8: Controls in the EP include:</p> <ul style="list-style-type: none"> • Marine Order 97 (Marine Pollution Prevention – Air Pollution).

<p><i>offsets and any proposal for carbon capture and storage.</i></p>	<ul style="list-style-type: none"> • Evaluation of contractors to include consideration of vessel fuel usage
<p>11. i. <i>The potential cumulative impacts of the above listed impacts or risks considered in the context of existing and proposed developments and/or activities in the vicinity of the area that may be affected by the activities and/or the Project, including in relation to a Worst Case Oil Spill.</i></p>	<p>WR9: Cumulative impacts have been considered in the Seismic EP (Section 6.3)</p>
<p>11. j. <i>The potential cumulative impacts of upstream and downstream activities associated with the Project as a whole, including transport of gas via undersea pipeline and onshore processing of gas.</i></p>	<p>WR10: Not relevant for the Seismic EP</p>
<p>12. <i>Information, including any reports, analyses, assessments and/or other documents, that:</i></p> <p>12.a. <i>Demonstrates that the environmental impacts and risks of the activities will be reduced to as low as reasonably practicable.</i></p> <p>12.b. <i>Demonstrates that the environmental impacts and risks of the activities will be of an acceptable level.</i></p> <p>12. c. <i>Details the environmental performance outcomes, environmental performance standards and measurement criteria to be adopted in relation to the activities.</i></p> <p>12. d. <i>Details the implementation strategy and monitoring, recording and reporting arrangements in relation to the environmental impacts and risks of the activities.</i></p>	<p>WR13:</p> <p>a. The demonstration that environmental impacts and risk of the activities will be reduced to as low as reasonably practicable (ALARP) is included in the Seismic EP, as required by the <i>Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009</i>. Through the EP assessment process, the adequacy of these ALARP positions will be assessed by NOPSEMA. ALARP positions form much of the Seismic EP document (see Section 6), which is under assessment and available on the NOPSEMA website.</p> <p>b. The demonstration that the environmental impacts and risks of the activities will be of an acceptable level is included in the EP, as required by the <i>Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009</i>. Please see Section 6 of the Seismic EP on the NOPSEMA website.</p> <p>c. The relevant environmental performance outcomes (EPOs) adopted are detailed in the EP, see Section 6.3 of the Seismic EP.</p> <p>d. The implementation strategy and monitoring, recording and reporting arrangements have been included in the Seismic EP, as required by the <i>Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009</i>. Please see Section 7 the Seismic EP on the NOPSEMA website.</p>
<p>Reasonable Period for Consultation</p>	<p>WR 14:</p> <p>Woodside advised and sought GAP's input regarding the proposed Scarborough development in December 2018 and offered GAP a briefing regarding the development in July 2019. No acknowledgement or response from GAP was received.</p>

	<p>Environment Plan consultation information sheets for each activity are publicly available on the Woodside website, including details on how to provide feedback. These information sheets are consistent with those provided to all relevant persons. We note GAP has subscribed to our Consultation Activities page.</p> <p>In addition, GAP was provided links to the full EPs on 29 April 2022.</p> <p>Acknowledging the above timeframes, including the additional 14-day period in which Woodside has requested GAP response to this letter, and that issues raised in GAP's correspondence have previously been addressed in previous consultations with other parties, Woodside believes GAP have been provided with a reasonable period for consultation on this EP.</p>
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Figure 1: Seismic worst-case loss of containment scenario (2000 m³ marine diesel spill) modelling outputs

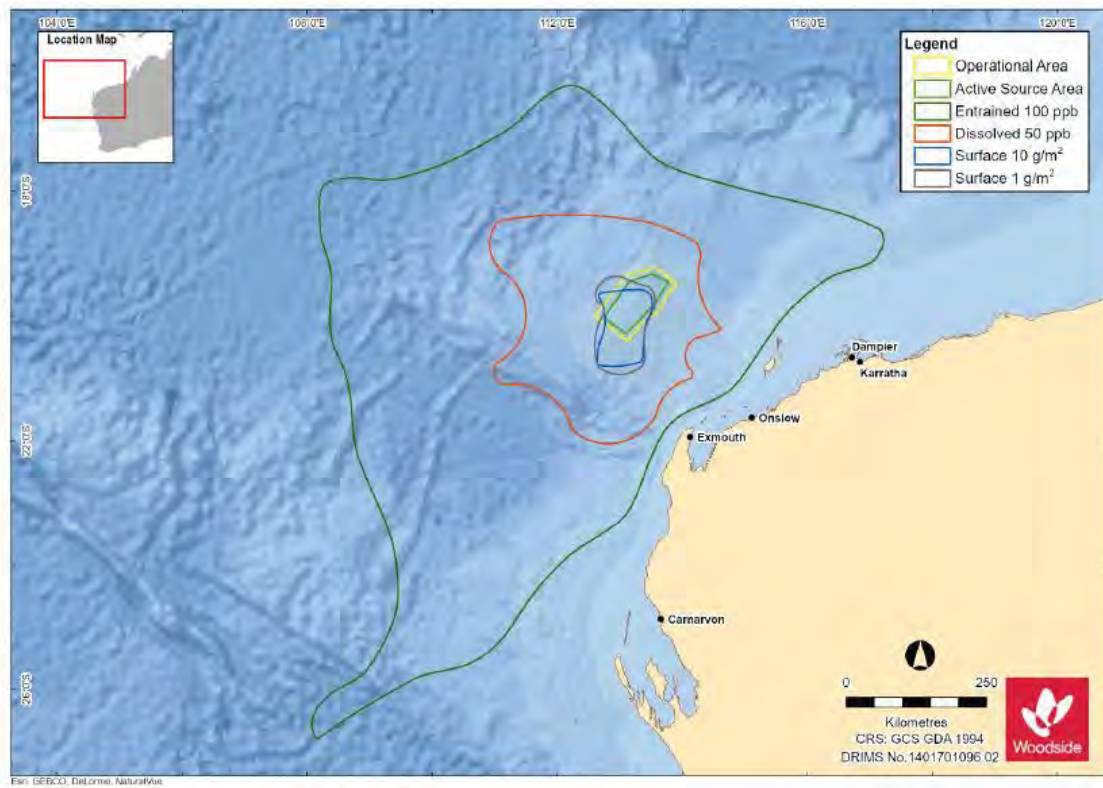


Figure 1 presents the outputs of stochastic modelling for the worst-case loss of containment scenario. Noting that the EMBA presented does not represent the predicted coverage of any one hydrocarbon spill or a depiction of a slick or plume at any particular point in time. Rather, the areas are a composite of a large number of theoretical paths, integrated over the full duration of the simulations under various metocean conditions.

Table 1: Seismic EP Environmental Aspects

Aspect	<i>EP Section Reference</i>
<i>Planned Activities (Routine and Non-routine)</i>	
Physical Presence: Interactions with Other Marine Users	6.6.1
Routine Acoustic Emissions: Seismic Survey Equipment	6.6.2
Routine Acoustic Emissions: Project Vessels	6.6.3
Routine Atmospheric Emissions and GHG Emissions	6.6.4
Routine Discharge: Bilge Water, Grey Water, Sewage, Putrescible Wastes and Deck Drainage Water	6.6.5
Routine Light Emissions: External Lighting on Project Vessels	6.6.6
<i>Unplanned Activities (Accidents, Incidents, Emergency Situations)</i>	
Accidental Hydrocarbon Release: Vessel Collision	6.7.2
Accidental Hydrocarbon Release: Bunkering	6.7.3
Unplanned Discharge: Deck Spills	6.7.4
Unplanned Discharge: Loss of Solid Hazardous and Non-Hazardous Wastes (including Dropped Objects)	6.7.5
Physical Presence: Vessel Collision / Entanglement with Marine Fauna	6.7.6
Physical Presence: Loss of Equipment	6.7.7
Physical Presence: Introduction and Establishment of Invasive Marine Species	6.7.8

1.29 Email sent to TCC (16 September 2022)

Dear Climate Council

Woodside has identified that Climate Council has referred to the Scarborough Project in an online public campaign.

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit. The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that Climate Council has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

Woodside has reviewed your online public campaign in relation to the activity defined in the Scarborough 4D Baseline Marine Seismic Survey Environment Plan, and notes that content generally relates to impacts and risks of the Scarborough Project to climate change and greenhouse gas (GHG) emissions.

We confirm that concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Scarborough 4D Baseline Marine Seismic Survey Environment Plan (the Seismic EP). Woodside confirms that the Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the Seismic EP but may be evaluated in Scarborough EPs as appropriate. GHG emissions associated with the Seismic activity (ie fuel combustion from project vessels) are considered in Section 6.5.5 (Revision 0) of the publicly available Seismic EP.

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside's consultation activities on our [website](#).

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit.

Survey type: Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.

Location: 214 km north-west of Exmouth
Latitude 20°16'59.043" | Longitude 113°6'0.387"E

Approximate Water Depth (m): 800 m – 1150 m

Schedule: Currently planned for Q4 2022

Duration: Around 55 days - 70 days

Vessels: A purpose-built seismic vessel, one support vessel and a potential chase vessel

Safe navigation zone (cautionary area) Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for

acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards,

Woodside Feedback

1.30 Email sent to The Wilderness Society (16 September 2022)

Dear Wilderness Society

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit.

The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that Wilderness Society has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

Woodside has reviewed your website and notes that it raised concern with seismic sources on marine life. We confirm that to mitigate the risk to cetaceans from the seismic survey, a suite of controls have been adopted in the EP (Section 6.5.3, Revision 0) to manage this risk to an ALARP and acceptable level for this activity including:

- C 4.1 - Seismic source validation
- C 5.1 - Application of EPBC Policy Statement 2.1 Part A Standard Management Procedures and Part B.4 to whales
- C 5.2 - Application of EPBC Policy Statement 2.1 Part B.1 – MFOs
- C 5.3 - Application of EPBC Policy Statement 2.1 Part B.5 – PAM
- C 5.4 - Adaptive Management Measures to minimise the potential impacts to pygmy blue whales from seismic noise
- C 5.5 - No operation of the seismic source within 25 km of the pygmy blue whale migration BIA
- C 6.1 - No operation of the seismic source outside of the Active Source Area
- C 7.1 - A 40 km separation distance between the Petroleum Activities Program and any identified concurrent seismic survey

Scarborough 4D B1 Marine Seismic Survey Environment Plan

The Active Source and Operational areas for the Scarborough 4D MSS, whilst within the distribution range for pygmy blue whales, are outside the migration BIA, and also not in an area where foraging or resting is likely to take place. Additionally, the activity does not overlap BIAs for any other marine mammal species. Accordingly, the likelihood of encountering pygmy blue whales and other cetaceans is expected to be low, even if the timing of the activity overlaps peak periods for northbound and southbound pygmy blue whale migration. The Active Source Area is located ~30 km from the western boundary of the migration BIA, and the results of the Thums et al. (2022) and Double et al. (2014) satellite tracking studies showed that out of a total of 20 pygmy blue whales tagged and tracked during these studies there was only a single individual migrating north that travelled to the west of the migration BIA.

The Environment Plan includes application of EPBC Act Policy Statement 2.1 Part B.6 – Adaptive Management measures to minimise the potential impacts to pygmy blue whales from seismic noise, which will be triggered if encounters with pygmy blue whales are more frequent than expected. The seismic survey vessel maintains a constant upper speed of 5 knots when in operation to minimise the noise of movement of water over the seismic streamers. This largely dictates the speed of both the escorting support and chase vessel that accompanies the survey vessel. In addition, vessels adopt the go-slow buffers around marine fauna as per EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans (C14.1).

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside's consultation activities on our [website](#).

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit.

Survey type: Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.

Location: 214 km north-west of Exmouth
Latitude 20°16'59.043" | Longitude 113°6'0.387"E

Approximate Water Depth (m): 800 m – 1150 m

Schedule: Currently planned for Q4 2022

Duration: Around 55 days - 70 days

Vessels: A purpose-built seismic vessel, one support vessel and a potential chase vessel

Safe navigation zone (cautionary area) Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards,

Woodside Feedback

1.31 Email sent to Extinction Rebellion WA (XRWA) (16 September 2022)

Dear Extinction Rebellion WA

Woodside has identified that Extinction Rebellion WA has referred to the Scarborough Project in an online public campaign.

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit.

The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that Extinction Rebellion WA has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

Woodside has reviewed your online public campaign in relation to the activity defined in the Scarborough 4D Baseline Marine Seismic Survey Environment Plan, and notes that content generally relates to impacts and risks of the Scarborough Project to climate change, greenhouse gas (GHG) emissions, rock art and Aboriginal cultural heritage.

We confirm that concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Scarborough 4D Baseline Marine Seismic Survey Environment Plan (the

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Seismic EP). Woodside confirms that the Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the Seismic EP but may be evaluated in Scarborough EPs as appropriate. GHG emissions associated with the Seismic activity (ie fuel combustion from project vessels) are considered in Section 6.5.5 (Revision 0) of the publicly available Seismic EP.

On rock art and Aboriginal cultural heritage – we confirm that activities covered by the 4D Seismic EP are located ~430 km away from Murujuga and will have no impact on access to sites of cultural and spiritual significance. Emissions from the activities covered by the 4D Seismic EP are of a scale and physical remoteness from Murujuga’s rock art that no credible impact pathway is foreseen. No rock art will be displaced as a result of the proposed Petroleum Activities Program (PAP). Damage to heritage sites is not anticipated as a result of the proposed Petroleum Activities Program (PAP). Woodside has undertaken archaeological assessments and ethnographic surveys to identify cultural heritage that may be impacted by the Scarborough development. These works have not identified any heritage places, objects or values which will be impacted by the activities covered by the 4D Seismic EP.

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside’s consultation activities on our [website](#).

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit.

Survey type: Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.

Location: 214 km north-west of Exmouth
Latitude 20°16’59.043” | Longitude 113°6’0.387”E

Approximate Water Depth (m): 800 m – 1150 m

Schedule: Currently planned for Q4 2022

Duration: Around 55 days - 70 days

Vessels: A purpose-built seismic vessel, one support vessel and a potential chase vessel

Safe navigation zone (cautionary area) Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards,

Woodside Feedback**1.32 Email sent to Market Forces (16 September 2022)**

Dear Market Forces

Woodside has identified that Market Forces has referred to the Scarborough Project in an online public campaign.

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit.

The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that Market Forces has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

Woodside has reviewed your online public campaign in relation to the activity defined in the Scarborough 4D Baseline Marine Seismic Survey Environment Plan, and notes that content generally relates to impacts and risks of the Scarborough Project to climate change, greenhouse gas (GHG) emissions, rock art, Aboriginal cultural heritage and an unplanned oil spill.

We confirm that concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Scarborough 4D Baseline Marine Seismic Survey Environment Plan (the

Seismic EP). Woodside confirms that the Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the Seismic EP but may be evaluated in Scarborough EPs as appropriate. GHG emissions associated with the Seismic activity (ie fuel combustion from project vessels) are considered in Section 6.5.5 (Revision 0) of the publicly available Seismic EP.

On rock art and Aboriginal cultural heritage – we confirm that activities covered by the 4D Seismic EP are located ~430 km away from Murujuga and will have no impact on access to sites of cultural and spiritual significance. Emissions from the activities covered by the 4D Seismic EP are of a scale and physical remoteness from Murujuga's rock art that no credible impact pathway is foreseen. No rock art will be displaced as a result of the proposed Petroleum Activities Program (PAP). Damage to heritage sites is not anticipated as a result of the proposed Petroleum Activities Program (PAP). Woodside has undertaken archaeological assessments and ethnographic surveys to identify cultural heritage that may be impacted by the Scarborough development. These works have not identified any heritage places, objects or values which will be impacted by the activities covered by the 4D Seismic EP.

On unplanned oil spill risk – we confirm that Unplanned Activities (Accidents, Incidents, Emergency Situations) from the marine seismic survey activity are assessed in Section 6.6 (Rev 0) of the publicly available EP.

- Section 4 (Rev 0) of the publicly available EP describes the Environment that May Be Affected (EMBA) which is the largest spatial extent where unplanned events could have an environmental consequence on the surrounding environment. For this EP, the EMBA is the potential spatial extent of surface and in-water hydrocarbons at concentrations above ecological impact thresholds, in the event of the worst-case credible spill, ecological impact thresholds used to delineate the EMBA are defined in Section 6.7.1.2. The worst-case credible spill scenario for this EP is a vessel collision resulting in hydrocarbon release of 2,000m³ of marine diesel.
- The EMBA presented does not represent the predicted coverage of any one hydrocarbon spill or a depiction of a slick or plume at any particular point in time. Rather, the areas are a composite of a large number of theoretical paths, integrated over the full duration of the simulations under various metocean conditions.
- The best response to a marine pollution event is considered to be prevention. Woodside and its contractors have agreed operating procedures and management plans in the unlikely event of an oil spill, to minimise loss of hydrocarbons to the environment.
- In the unlikely event of an oil spill, a NOPSEMA approved Oil Pollution Emergency Plan (OPEP) will be in place for all activities to be managed under this EP.

The OPEP supports timely implementation of pre-determined response strategies through defined organisational structures, human and physical resource requirements, and alignment with applicable government and industry oil spill response plans and requirements.

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside's consultation activities on our [website](#).

Activity:

Summary:	The purpose of the survey is to improve data quality and subsurface imaging within the permit.
Survey type:	Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.
Location:	214 km north-west of Exmouth Latitude 20°16'59.043" Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Currently planned for Q4 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards,

Woodside Feedback

1.33 Email sent to Australasian Centre for Corporate Responsibility (ACCR) (16 September 2022)

Dear Australasian Centre for Corporate Responsibility

Woodside has identified that the Australasian Centre for Corporate Responsibility (ACCR) has referred to the Scarborough Project in an online public campaign.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit.

The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that ACCR has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

Woodside has reviewed your online public campaign in relation to the activity defined in the Scarborough 4D Baseline Marine Seismic Survey Environment Plan, and notes that content generally relates to impacts and risks of the Scarborough Project to climate change and greenhouse gas (GHG) emissions.

We confirm that concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Scarborough 4D Baseline Marine Seismic Survey Environment Plan (the Seismic EP). Woodside confirms that the Seismic EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program (PAP), having regard to the nature and scale of the proposed PAP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for the Seismic EP but may be evaluated in Scarborough EPs as appropriate. GHG emissions associated with the Seismic activity (ie fuel combustion from project vessels) are considered in Section 6.5.5 (Revision 0) of the publicly available Seismic EP.

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside's consultation activities on our [website](#).

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit.

Survey type: Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Location:	214 km north-west of Exmouth Latitude 20°16'59.043" Longitude 113°6'0.387"E
Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Currently planned for Q4 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards

Woodside Feedback

1.34 Email sent to International Fund for Animal Welfare (IFAW) (16 September 2022)

Dear International Fund for Animal Welfare

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit.

The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the

NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that the International Fund for Animal Welfare has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside's consultation activities on our [website](#).

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit.

Survey type: Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.

Location: 214 km north-west of Exmouth
Latitude 20°16'59.043" | Longitude 113°6'0.387"E

Approximate Water Depth (m): 800 m – 1150 m

Schedule: Currently planned for Q4 2022

Duration: Around 55 days - 70 days

Vessels: A purpose-built seismic vessel, one support vessel and a potential chase vessel

Safe navigation zone (cautionary area) Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards,

Woodside Feedback

1.35 Email sent to World Wildlife Fund (WWF) Australia (19 September 2022)

Dear World Wildlife Fund

Please be advised that Woodside has submitted an [Environment Plan](#) to NOPSEMA for a marine seismic survey in Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.

The purpose of the marine seismic survey is to improve data quality and subsurface imaging within the permit.

The activity is planned to commence in Q4 2022 for a period of around 55 to 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

A Consultation Information Sheet is attached, which provides background on the proposed activity, including a summary of potential key risks and associated management measures. The Information Sheet has been available on [Woodside's website](#) since May 2021, inviting comments on the proposed activities or requests for additional information. Revision 0 of the EP has been available on the NOPSEMA website since 18 October 2021 and was open for public comment until 17 November 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Noting consultation material has been available since May 2021 and feedback was sought by 14 June 2021, we understand that the WWF has not commented on the proposed activity or sought further information on it. Should you have feedback on the proposed Scarborough 4D Baseline Marine Seismic Survey Environment Plan, please provide your views by **30 September 2022**.

If it would assist with consultation, Woodside would welcome the opportunity to meet with you prior to 30 September 2022, to discuss the Scarborough 4D Baseline Marine Seismic Survey Environment Plan. Should you wish to meet with Woodside, please advise as soon as possible. Beyond this timeframe, consultation is ongoing and feedback is accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.

Please note that there will be further consultation opportunities for the other activities undertaken as part of the Scarborough Project. For further information, you can subscribe to Woodside's consultation activities on our [website](#).

Activity:

Summary: The purpose of the survey is to improve data quality and subsurface imaging within the permit.

Survey type: Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (triple) and multiple streamers towed behind the survey vessel.

Location: 214 km north-west of Exmouth
Latitude 20°16'59.043" | Longitude 113°6'0.387"E

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Approximate Water Depth (m):	800 m – 1150 m
Schedule:	Currently planned for Q4 2022
Duration:	Around 55 days - 70 days
Vessels:	A purpose-built seismic vessel, one support vessel and a potential chase vessel
Safe navigation zone (cautionary area)	Three nautical mile radius safe navigation area around the seismic vessel and streamers during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

Survey location:

The location of the Active Source Area and Operational Area are outlined in the attached Consultation Information Sheet.

Feedback:

If you have issues or concerns with the proposed marine seismic activities then please respond to Woodside at Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan, which will be resubmitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Please provide your views by **30 September 2022**.

Regards,

Woodside Feedback

Scarborough 4D B1 Marine Seismic Survey Environment Plan

SCARBOROUGH CONSULTATION

Scarborough 4D B1 Marine Seismic Survey (Scarborough Seismic)

Proposed activity details	
Location	• Located in the Exmouth Plateau, approximately 214 km north-west of Exmouth, Western Australia
Earliest commencement date	• Q3 2022
Estimated duration	• 60 – 75 days
Active Source Area	• ~5,152 km ²
Operational Area	• ~6,250 km ²
Water depth in Operational Area	• Approximately 800 m – 1150 m
Vessels	• 2 purpose-built seismic vessels, one support vessel and a submersible supply vessel
Distance from Active Source Area to nearest port/marina	• 214 km north-west of Exmouth
Distance from Active Source Area to nearest marine park	• 48 km north of Gascoyne Marine Park, Mulgahs LGA Zone



SCARBOROUGH CONSULTATION

Scarborough Drilling and Completions (Scarborough D&C)

Proposed activity details	
Location	• Perry Area WA 41-8 in Commonwealth waters, about 274 km north-west of Exmouth, Western Australia
Water depth	• Approximately 900 m – 955 m
Earliest commencement date	• H2 2022 pending approval, start of suitability area restrictions
Estimated duration	• 50-60 days per well
Operational Area (OA)	• ~4,350 m ² for proposed mobile offshore drilling unit (MODU) 500 m by 800 m, generally proposed within drilling area (DFNOCZ)
Vessels	• Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or completion activities • Support vessels including installation vessels, anchor handling vessels and general supply/support vessels
Distance from OA to nearest port/marina	• 244 km north-west of Exmouth, 174 km north-west of Dampier
Distance from OA to nearest marine park	• 33 km north of the Gascoyne Marine Park (GMP) • 206 km north-west of Monashville Marine Park (MMP) • 278 km north-west of Ningaloo Marine Park (NMP)



1.36 NOPSEMA public comment period newspaper advertisements (21 October 2022) placed in the Pilbara News, The West Australian and The Australian

Scarborough 4D Baseline Marine Seismic Survey Notice

Woodside Energy Scarborough Pty Ltd is proposing to conduct the Scarborough 4D Baseline Marine Seismic Survey activity in Q3 2022 located in Commonwealth waters adjacent to WA. The activity will be conducted for up to 80 days in an operational area up to 9,200 km², 214 km north west of Exmouth.

An Environment Plan (EP) for the activity has been prepared in accordance with the regulations administered by NOPSEMA under the Offshore Petroleum and Greenhouse Gas Storage Act 2006. A comment period is open until Wednesday 17 November 2021 providing the public with an opportunity to submit a comment in relation to the EP.

To submit a comment or for further information about the activity see NOPSEMA's website at: Industry environment plans (nopsema.gov.au).

1.37 Email sent to National Energy Resource Australia (NERA) Collaborative Seismic Environment Plan Project (CSEP) (11 November 2022)

Dear Samantha,

Further to the below correspondence regarding Woodside's Scarborough 4D B1 Marine Seismic Survey, please be advised that Woodside has submitted an Environment Plan (EP) to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for the following proposed activities:

- [Scarborough Seabed Intervention and Trunkline Installation Environment Plan](#) (SITI EP)
- [WA-61-L Scarborough Drilling and Completions](#) (D&C EP)

Woodside has previously submitted Revision 1 of the SITI EP to NOPSEMA. This revision of the EP has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Woodside has also previously submitted Revision 0 of the D&C EP to NOPSEMA. This revision of the EP has been available on the NOPSEMA website since November 2021

(https://info.nopsema.gov.au/environment_plans/565/show_public). Woodside is preparing an updated revision of the SITI EP and D&C EP for submission to NOPSEMA. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. Woodside is also proposing to undertake seabed site surveys and installation of subsea production infrastructure within Permit Areas WA-61-L and WA-62-L, about 374 km west-northwest of Dampier, Western Australia under the [WA-61-L and WA-62-L Subsea Infrastructure Installation Environment Plan](#) (Subsea EP). This EP has not yet been submitted to NOPSEMA.

A Consultation Information Sheet for each of the activities is linked above, which provides background on the proposed activity, including a summary of potential key risk and associated management measures. They are also available on our [website](#).

The proposed activities under the SITI EP, D&C EP and Subsea EP are planned to be undertaken within a subset of the activity area for the Scarborough Seismic Survey and may be of interest to you.

Each of these EPs fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP) and will be conducted in line with relevant requirements of the OPP. The OPP includes a detailed description of activities and an assessment of impacts; with controls to develop acceptability criteria. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

Should NERA CESP have feedback on the SITI EP, D&C EP or Subsea EP, please provide your views by **25 November 2022**.

Your feedback and our response will be included in our Environment Plan which will be submitted to NOPSEMA for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

Regards,

Woodside Feedback


1.38 Presentation to Exmouth Community Reference Group (17 November 2022)

ENVIRONMENT PLANS


Scarborough

- State and Commonwealth primary environmental approvals for the Scarborough Project secured
- Project and related activity-specific Environment Plans in development / under NOPSEMA assessment

<p>Scarborough 4D B1 Marine Seismic Survey (Cth)</p> <ul style="list-style-type: none"> • Submitted for assessment October 2021 • Proposal to conduct a 4D baseline marine seismic survey over the Scarborough field within Commonwealth waters, ~ 214 km north-west of <u>Exmouth</u> 	<p>Scarborough Seabed Intervention and Trunkline Installation (Cth)</p> <ul style="list-style-type: none"> • Submitted for assessment Dec 2021 • Proposal for seabed intervention and installation activities for the section of the Scarborough Trunkline in Commonwealth waters that runs ~ 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) (~244 km north-northwest of Exmouth) to the existing onshore Pluto LNG facility on the Burrup Peninsula
<p>Scarborough Drilling and Completions (Cth)</p> <ul style="list-style-type: none"> • Submitted for assessment November 2021 • Proposal for drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells ~244 km north-northwest of Exmouth 	<p>Scarborough Subsea Infrastructure Installation (Cth)</p> <ul style="list-style-type: none"> • In development • Proposal for visual and gravimetric surveys, plus installation of flowlines, umbilicals, risers, mooring legs, concrete pads and ancillary infrastructure, required for the flow and control of hydrocarbons to the Scarborough FPU, ~244 km north-northwest of Exmouth



1.39 Woodside Consultation Information Sheet – (updated January 2023)



STAKEHOLDER CONSULTATION

INFORMATION SHEET

January 2023

SCARBOROUGH 4D BASELINE MARINE SEISMIC SURVEY

NORTHERN CARNARVON BASIN

Woodside is planning to conduct a 4D baseline marine seismic survey (MSS) over the Scarborough and Jupiter field within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia. The proposed activity is planned to commence in H1 2023 for a period of between 55 and 70 days, pending approvals, final survey dimensions, vessel availability and weather constraints.

The proposed survey will be conducted over areas where the Scarborough Joint Venture has previously acquired seismic data. The objective for the proposed activity is to acquire a new 3D seismic survey that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey) over the Scarborough, North Scarborough and possibly the Jupiter gas fields (located within Petroleum Titles WA-61-L, WA-62-L, WA-61-R & WA-63-R).

Figure 1 Proposed Scarborough 4D Baseline MSS Active Source and Operational Area

Scarborough 4D Baseline Marine Seismic Survey

About marine seismic surveys

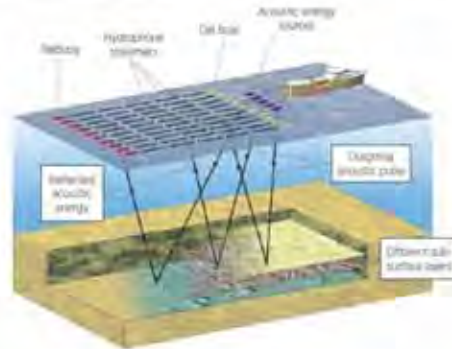
During planned activities, a seismic vessel traverses a series of pre-determined sail lines within the survey Active Source Area at a speed of approximately three to five knots (5.5 - 9.3 km/hr).

An additional buffer area, or Operational Area, around the Active Source Area is allowed for vessel manoeuvring and line turns. No discharge of the seismic source will occur in this Operational Area. Testing of the seismic source, 'soft starts', and all other operations of the seismic source during seismic lines including 'run ins' and 'run outs' will all be undertaken within the Active Source Area.

As the vessel travels along a sail line series, seismic air sources discharge compressed air to generate acoustic pulses approximately every 2 to 10 seconds.

These acoustic pulses are directed vertically through the water column and into the seabed. The released energy is reflected at geological boundaries, with the reflected signals detected by sensitive microphones called 'hydrophones, geophones or MEMS', embedded within cables, or streamers, towed directly behind the seismic vessel.

The reflected sound is recorded and then processed to generate a seismic image, providing information about the structure and composition of geological formations and the associated sedimentary properties below the seabed.



Proposed activity

Table 1 - Activity summary

Activity	Details
Earliest commencement date	H1 2023 (pending approvals, vessel availability and weather constraints)
Estimated duration	55 - 70 days
Active Source Area	~5,650 km ²
Operational Area	~9,200 km ²
Water depth in Operational Area	Approximately 800 m - 1,150 m
Last acquired data	2004
Vessels	A purpose built seismic vessel, one support vessel, a potential chase vessel and an additional topper vessel (May to June).
Distance from Active Source Area to nearest port/marina	214 km north-west of Exmouth
Distance from Active Source Area to nearest marine park	46 km north of Gascoyne Marine Park Multiple Use Zone

The proposed survey will be conducted by a purpose-built seismic survey vessel. The proposed marine seismic survey is typical of seismic surveys conducted in Australian marine waters, in terms of technical methods and procedures.

Woodside is proposing to acquire a 3D seismic survey to be used as a future 4D baseline within the Active Source Area. This involves the use of an acoustic source array (dual or triple) and multiple streamers towed behind the survey vessel.

An additional support vessel will accompany the seismic vessel for assistance in the form of emergency tow as required and to re-supply the survey vessel with fuel and other logistical and operational supplies. An additional chase vessel may be used to manage interactions with other marine users in the vicinity of the survey if required. An additional vessel may be used during northbound migration. Survey activities will take place 24 hrs per day.

Technical details are outlined in Table 2.

Table 2 - Technical overview

Activity	Details
Number of streamers	Up to 14
Each streamer length	~ 8 km
Distance between streamers	between 50 to 100 m - 75 m
Maximum width of streamer array	~ up to 1.5 km
Safe navigation area (cautionary zone)	Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations
Streamer tow depth	~ 15 m to 20 m
Sound source size	up to 3,150 kW

Communications with mariners

A temporary three nautical mile radius safe navigation area will be maintained around the seismic vessel and towed array during seismic operations. Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels.

The seismic vessel will be actively acquiring seismic data within the Active Source Area determined for these activities. Marine notices will be issued prior to the start of work to alert vessels that maybe operating in waters nearby and that access to these areas may be limited.

Woodside will provide updates on vessel movements and their details during the activities in the form of look ahead reports at an appropriate frequency to meet relevant stakeholder needs.

The location of the Active Source Area and Operational Area are outlined in **Table 3**.

Table 3 - Survey location

Location point	
Latitude	Longitude
Active Source Area	
20°16'59.043"S	113°6'03.387"E
20°14'096"S	112°44'50.156"E
19°28'31.503"S	113°24'43.11"E
19°26'15.236"S	113°11'12.497"E
19°19'55.308"S	113°30'40.293"E
19°27'20.645"S	113°46'53.197"E
19°49'26.264"S	113°32'44.0"E
Operational Area	
20°24'2.0"S	113°6'45.182"E
19°59'57.873"S	112°36'7.853"E
19°20'39.38"S	113°6'41.252"E
19°13'25.19"S	113°33'49.172"E
19°29'41.467"S	113°54'32.011"E
19°40'50.544"S	113°44'44.882"E
19°54'42.198"S	113°37'40.185"E
20°6'2.873"S	113°23'11.368"E
20°6'31.786"S	113°22'13.473"E

Implications for stakeholders

In support of the proposed activities, Woodside will consult relevant stakeholders whose interests, functions and activities may be affected by the proposed activities. We will also keep other stakeholders who have identified an interest informed about our planned activities.

Woodside has undertaken an assessment to identify potential risks to the marine environment and relevant stakeholders, considering timing, duration, location, and potential impacts arising from the Scarborough 4D Baseline Marine Seismic Survey.

A number of mitigation and management measures will be implemented and are summarised below.

Environment That May Be Affected (EMBA)

The environment that may be affected (EMBA) is the largest spatial extent where the Scarborough Seismic Survey Activity could potentially have an environmental consequence (direct or indirect impact). The broadest extent of the EMBA takes into consideration planned and unplanned activities, and for this Environment Plan (EP) is determined by a highly unlikely release of marine diesel to the environment as a result of a vessel collision. This is depicted in Figure 2.

The EMBA does not represent the extent of the predicted impact of the highly unlikely marine diesel release. Rather, the EMBA represents the merged area of many possible paths a highly unlikely hydrocarbon release could travel depending on weather and ocean conditions at the time of the release.

This means in the highly unlikely event a hydrocarbon release does occur, the entire EMBA will not be affected and the specific and minimal part of the EMBA that is affected will only be known at the time of the release.



Figure 2. Environment that May Be Affected by the Scarborough Seismic Survey Activity

Mitigation and management measures

Woodside has undertaken an assessment to identify potential impacts and risks to the environment arising from the Scarborough Seismic Survey Activity.

A number of mitigation and management measures for the Scarborough Seismic Survey Activity are outlined in **Table 4**.

Table 4 - Summary of key risks and/or impacts and preliminary management measures for the Scarborough Seismic Survey Activity

Potential Impact/Risk	Description of Source of Potential Impact/Risk	Description of Potential Impact/Risk	Preliminary Mitigation and/or Management Measures ¹
Planned			
Physical presence and interactions with other marine users	<ul style="list-style-type: none"> Several vessel types will be required to complete the activity including one seismic survey vessel, one chase vessel and one spotter vessel (May to June). The physical presence and movement of project vessels within the Operational Area has the potential to displace other marine users. 	<ul style="list-style-type: none"> Other vessels in the Operational Area, which may include commercial fishing, shipping, and defence vessels, may be asked to deviate periodically to accommodate seismic survey operations. Deviations or interactions would be short-term due to the small area occupied by the seismic vessel and Safe Navigational Area (SNA) at any one time, and its transient nature. Impacts would be limited to operational inconvenience (navigational hazard) and temporary displacement within the Operational Area. The Operational Area overlaps with a shipping fairway and north-south international shipping traffic and therefore the potential impact to commercial shipping is expected to include short-term displacement of vessels as described above. Given the absence of fishing in the Operational Area in recent years, it is expected there will be no impact to commercial fisheries. The Operational Area is considered too far offshore for recreational fishing or tourism activities to occur. Therefore, it is expected there will be no impact. The Department of Defence (DoD) did not identify any activities within the North-West Exercise Area (NWEA) that overlaps the Operational Area. 	<ul style="list-style-type: none"> Vessels adhere to legislative requirements for navigational safety. Notify relevant government department, fishing industry representative bodies and licence holders of activities prior to commencement and upon completion of activities. Notify the Australian Hydrographic Service (AHS) prior to commencement of the activity to enable them to update maritime charts, so that marine users are aware of the activity. Consult with relevant persons to ensure they are informed of the proposed activities. A concurrent operations plan developed for concurrent seismic activities identified (currently none have been identified). Publicly available interactive map showing location of the seismic vessel. 3 nm SNA established and communicated around the seismic vessel and towed array. One vessel available to assist the seismic vessel to manage third-party vessel interactions. Project vessels operating with appropriate equipment lighting to alert third-party marine users.
Routine acoustic emissions: project vessels	<ul style="list-style-type: none"> Project vessels will generate noise in the air and underwater due to the operation of burner engines, propellers, and on-board machinery etc. 	<ul style="list-style-type: none"> Elevated underwater noise can affect marine fauna, including marine mammals, turtles and fishes in three main ways: <ol style="list-style-type: none"> By causing direct physical effects, including injury or hearing impairment. Hearing impairment may be temporary or permanent. Through disturbance leading to behavioural changes or displacement from important areas. The occurrence and intensity of disturbance is highly variable and depends on a range of factors relating to the animal and situation. By masking or interfering with other biologically important sounds (including vocal communication, echolocation, signals and sounds produced by predators or prey). Marine fauna associated with the Operational Area will be predominantly pelagic fish species, with the potential for species such as whale sharks, rays, marine turtles and marine mammal species to transit through the Operational Area. There are no marine fauna Biologically Important Areas (BIAs) within the Operational Area. Therefore, potential impacts from vessel noise are likely to be restricted to temporary avoidance behaviour to individuals and are therefore considered localised with no lasting effect. 	<ul style="list-style-type: none"> Comply with regulatory requirements for interactions with marine fauna to prevent adverse interactions.

¹ This EPE is currently under development – these mitigation and management measures are subject to change through the consultation and assessment process and will be updated in the final version of the EPE (or in the final plan and report).

Potential Impact/Risk	Description of Source of Potential Impact/Risk	Description of Potential Impact/Risk	Preliminary Mitigation and/or Management Measures ¹
<p>Routine acoustic emissions: seismic survey equipment</p>	<ul style="list-style-type: none"> The seismic source will consist of an airgun array with a maximum capacity of up to 3350 m³. The source will be used to generate acoustic pulses by discharging compressed air periodically into the water column, at intervals of about five to six seconds. 	<ul style="list-style-type: none"> Elevated underwater noise can affect marine fauna, including marine mammals, turtles and fishes in three main ways (see above). The area over which seismic sound may impact marine species depends upon many factors including the extent of sound propagation relative to the location of receptors, and the sensitivity and range of spectral hearing of different species. The potential impacts of noise emissions from the seismic source on zooplankton during the seismic acquisition are considered to be slight and short-term, and the activity is not likely to result in ecologically significant impacts at a population level for zooplankton, fish eggs or larvae that may be present in the water column within or adjacent to the Operational Area. Demersal and pelagic fish communities within the Operational Area may exhibit some temporary behavioural responses to noise emissions from the seismic source, however, this is not likely to have an impact at the ecosystem level. Potential impacts from acoustic emissions on fish, sharks and rays are likely to be restricted to localised and temporary avoidance behaviour, and individuals impacted are unlikely to represent a significant proportion of the population within the Operational Area and the region overall. Potential impacts from acoustic emissions on fish, sharks and rays are likely to be restricted to localised and temporary avoidance behaviour, and individuals impacted are unlikely to represent a significant proportion of the population within the Operational Area and the region overall. The potential impacts of noise emissions from the seismic source on marine mammals during the acquisition of the survey are likely to be short-term and restricted to temporary behavioural changes (avoidance) in individuals moving through the Operational Area, with predicted noise levels from the seismic acquisition not considered likely to cause injury effects. Migrating whales are surrounded by open water with no restrictions (such as shallow waters, embayments) on an animal's ability to avoid the activities. Whales transiting through the area may deviate slightly from their migration route, but can continue on their migration pathway without any long-term impact. The potential impacts of noise emissions from the seismic source on marine reptiles (turtles) during the acquisition of the survey are considered to be slight and short-term. Interaction with turtles is expected to be low and impacts are likely to be restricted to temporary behavioural changes (avoidance) to transient turtles that may pass within 3.87 km of the seismic source. Turtles would be exposed to noise levels above behavioural threshold levels for a short period of time as the vessel moves through the survey area (up to 80-days). 	<ul style="list-style-type: none"> Comply with regulatory requirements for interactions with marine fauna to prevent adverse interactions. The use of trained Marine Fauna Observers to implement management procedures and adaptive management measures to minimise potential impacts to pygmy blue whales and other marine fauna from seismic noise. Dedicated spotter vessel deployed ahead of the seismic vessel if activity overlaps the May-June peak period for northbound migration of pygmy blue whales. Seismic source will be validated against noise sources assessed as acceptable in the EP and will not be discharged outside of the Active Source Area to limit the extent of underwater noise. Operation of the seismic source will not occur within 25 km of the pygmy blue whale migration BIA. A 40 km separation distance will be applied between the activity and any identified concurrent seismic surveys.

Potential Impact/ Risk	Description of Source of Potential Impact/Risk	Description of Potential Impact/Risk	Preliminary Mitigation and/or Management Measures ¹
Routine acoustic emissions: seismic survey equipment (cont)		<ul style="list-style-type: none"> In the absence of foraging BIA's, it is unlikely seabirds would be impacted by the seismic survey. Nothing that no commercial fisheries operate within or near the Operational Area and the Operational Area does not provide suitable habitat or water depths for target fish or crustacean species; no physical or behavioural impacts are predicted to commercial fish stocks and no impacts are predicted to commercial fishery catch rates. The Scarborough Seismic Survey Activity will be undertaken in a manner consistent with the management objectives for Australian Marine Parks (AMPs) and the North-West Marine Park Network. No long-term impacts are predicted and the values will be conserved and protected. 	
Atmospheric emissions and greenhouse gas (GHG) emissions	<ul style="list-style-type: none"> Atmospheric emissions and greenhouse gases will be generated by the project vessels from internal combustion engines and incineration activities. 	<ul style="list-style-type: none"> Emissions from project vessels could result in temporary, localised reductions in air quality in the immediate vicinity of the vessels. Given the short duration and exposed location of project vessels (which will lead to the rapid dispersion of the low volumes of atmospheric emissions), the potential impacts are expected to be localised and of no lasting effect. Given the nature and scale of GHG emissions from vessel fuel usage for this activity, the potential GHG impact and risk from this activity is considered negligible. 	<ul style="list-style-type: none"> Comply with regulatory requirements for marine air pollution and GHG emissions reporting. Evaluation of contract tenders will include consideration of vessel fuel usage/emissions and low carbon/alternative fuels.
Routine discharge: bilge water, greywater, sewage, putrescible wastes and deck drainage water	<ul style="list-style-type: none"> Sewage, greywater and putrescible waste will be discharged from project vessels. Bilge water, deck drainage and brine and cooling water may also be discharged. 	<ul style="list-style-type: none"> The main impact associated with ocean disposal of sewage and other organic wastes (i.e. putrescible waste) is eutrophication. Eutrophication occurs when the addition of nutrients, such as nitrates and phosphates, causes adverse changes to the ecosystem including short-term, localised impacts to water quality. No significant impacts are expected to water quality from planned discharges because of the minor quantities involved, the expected localised mixing zone and high level of dilution into the open water marine environment of the Operational Area. Similarly, although some marine fauna may transit the Operational Area, any potential for impact remains low due to the localised nature of discharges and rapid dilution. 	<p>Routine marine discharges will be managed consistently with regulatory requirements.</p>

¹ Commonwealth of Australia (2012) Marine Pollution Guidelines.

Potential Impact/Risk	Description of Source of Potential Impact/Risk	Description of Potential Impact/Risk	Preliminary Mitigation and/or Management Measures ²
Light emissions	<ul style="list-style-type: none"> Project vessels will use external lighting to navigate and conduct safe operations at night. Vessel lighting will also be used to communicate the vessels' presence to other marine users (i.e. navigation/warning lights) 	<ul style="list-style-type: none"> Light emissions can affect fauna (such as marine turtles and birds) in two ways: <ol style="list-style-type: none"> Behaviour: artificial lighting has the potential to create a constant level of light at night that can override natural levels and cycles. Orientation: if an artificial light source is brighter than a natural source, the artificial light may override natural cues, leading to disorientation. Light emissions to marine turtles from project vessels are unlikely to result in more than localized, behavioural disturbance to isolated transient individuals, with no lasting effect to the species. The Operational Area may be visited occasionally by seabirds, but does not overlap with BIAs or critical habitat for bird species. Impacts are expected to be limited to temporary behavioural disturbance to isolated individuals, with no lasting effect or displacement from important habitat. Lighting from project vessel activities in the Operational Area may result in the localized aggregation of fish around the vessel. Any long-term changes to fish species' composition or abundance are considered highly unlikely and are not expected to impact on commercial fisheries in the area. 	<ul style="list-style-type: none"> Lighting will be limited to the minimum required for navigation and safe operational requirements, with the exception of emergency events.
Unplanned			
Unplanned hydrocarbon release - vessel collision	<ul style="list-style-type: none"> Project vessels will use marine diesel fuel, meaning a vessel collision involving a project vessel or third-party during the activity may result in the release of marine diesel. For a collision to result in the worst-case scenario diesel release, several factors must occur as follows: <ul style="list-style-type: none"> Identified causes of vessel interaction must result in a collision. The collision has enough force to penetrate the vessel hull and in the exact location of the fuel tank. The fuel tank must be full of at least of volume which is higher than the point of penetration. 	<ul style="list-style-type: none"> In the highly unlikely event of a vessel collision causing a release of hydrocarbons, impacts to water quality and marine ecosystems could occur. Modelling of a surface release of marine diesel was undertaken as worst case scenario vessel collision. Marine diesel is a relatively volatile, non-persistent nature hydrocarbon with up to 35% evaporating within the first 24 hours. Potential impacts across the EMBA were assessed including receptors such as plankton, mangroves, seabirds and migratory shorebirds, saltmarshes, coral, tourism, recreation and cultural heritage (for example). Taking into account receptor sensitivity, the highest consequence rating for this unplanned event was a 'Moderate' risk. Receptors were rated as having a potential consequence level of 'Minor' or less ('Slight' or 'Negligible'). 	<p>Preventing vessel collision:</p> <ul style="list-style-type: none"> Comply with regulatory requirements for the prevention of vessel collisions and safety and emergency arrangements. Consult with relevant persons so that other marine users are informed and aware, reducing the likelihood of a collision. Establish a Safety Navigation Area around vessels which are communicated to marine users to reduce the likelihood of a collision. Develop a management plan for simultaneous operations where a concurrent seismic activity is identified in the Operational Area (currently none have been identified). One vessel available to assist the seismic vessel to manage third-party vessel interactions to reduce the likelihood of a collision. Notify relevant government departments, fishing industry representative bodies and licence holders of activities prior to commencement and upon completion of activities. Notify the AHS prior to commencement of the activity to enable them to update maritime charts, so that marine users are aware of the activity. <p>Spill response arrangements:</p> <ul style="list-style-type: none"> Arrangements supporting the Oil Pollution Emergency Preparation document (OPEP) will be tested so that the OPEP can be implemented as planned. In the event of a spill, emergency response activities would be implemented in line with the OPEP.

Potential Impact/ Risk	Description of Source of Potential Impact/Risk	Description of Potential Impact/Risk	Preliminary Mitigation and/or Management Measures ¹
Unplanned hydrocarbon release - bunkering	<ul style="list-style-type: none"> Accidental loss of hydrocarbons to the marine environment during bunkering/refueling may occur; caused by partial or total failure of a bulk transfer hose or fittings due to operational stress or other integrity issues 	<ul style="list-style-type: none"> A marine diesel surface release is expected to be confined to within several kilometers of the release site, and well within the EMBA identified for the vessel collision scenario. The unplanned marine diesel release has the potential to result in changes in water quality and fauna behaviour. Receptors considered in the risk assessment for this unplanned event included marine mammals, marine reptiles, fish, sharks and rays. Taking into account receptor sensitivity, receptors were rated as having a potential consequence level of "Minor" or less ("Slight" or "Negligible"). 	<p>Preventing unplanned hydrocarbon release due to bunkering:</p> <ul style="list-style-type: none"> Comply with regulatory requirements for the prevention of vessel collisions and safety and emergency arrangements. Appropriate bunkering equipment kept and maintained, and contractors to follow procedures and requirements for bunkering and refueling to reduce the likelihood of a spill. <p>Spill response arrangements:</p> <ul style="list-style-type: none"> Maintain and locate spill kits close to hydrocarbon storage and deck areas for use to contain and recover deck spills. Arrangements supporting the Oil Pollution Emergency Preparation document (OPEP) will be tested to ensure the OPEP can be implemented as planned. Emergency response activities would be implemented in line with the OPEP. Comply with regulatory requirements for the prevention of marine pollution. Liquid chemical and fuel storage areas are bundled or secondarily contained when they are not being handled/moved temporarily. Spill kits positioned in high-risk locations around the vessel (near potential spill points such as transfer stations).
Unplanned discharge - deck spills	<ul style="list-style-type: none"> Accidental, unplanned loss of liquid chemical or fuels from equipment/storage on deck. 	<ul style="list-style-type: none"> Unplanned discharges of non-process chemicals and hydrocarbons may decrease the water quality in the immediate vicinity of the release. Only small volumes (<50 L) are anticipated, resulting in very short-term impacts to water quality, and limited to the immediate release location. The biological consequences of such a small volume spill on identified open water sensitive receptors relate to a minor potential for toxicity impacts to plankton and fish populations (surface and water column biota) and localised reduction in water quality within a small spill affected area. No impacts are predicted to benthic habitat communities in the Operational Area. 	<ul style="list-style-type: none"> Comply with regulatory requirements for the prevention of marine pollution. Liquid chemical and fuel storage areas are bundled or secondarily contained when they are not being handled/moved temporarily. Spill kits positioned in high-risk locations around the vessel (near potential spill points such as transfer stations).
Unplanned discharge of solid hazardous, non-hazardous solid waste, equipment	<ul style="list-style-type: none"> Accidental, unplanned loss of hazardous or non-hazardous solid wastes/equipment to the marine environment may occur if dropped or blown overboard. Dropped objects may also result in unplanned disturbance of benthic habitat. 	<ul style="list-style-type: none"> The potential impacts of hazardous or non-hazardous solid wastes and equipment accidentally discharged to the marine environment include contamination of the environment as well as secondary impacts relating to potential contact of marine fauna with wastes. The temporary or permanent loss of waste materials/equipment into the marine environment is not likely to have a significant environmental impact, based on the location of the activity, the types, size and frequency of wastes that could occur, and species present. 	<ul style="list-style-type: none"> Comply with regulatory requirements for the prevention of marine pollution and handling of hazardous wastes. Implement waste management procedures to ensure the safe handling and transportation, segregation and storage and appropriate classification of all waste generated. Solid waste/equipment dropped to the marine environment will be recovered, where safe and practicable to do so. Where retrieval is not practicable and/or safe, material items (property) that are lost to the marine environment will undergo an impact assessment and will be added to the inventory for the title. Comply with regulatory requirements for navigational safety to reduce the likelihood of a collision which could result in loss of equipment. Equipment operated as per predetermined procedures to reduce the likelihood of equipment loss. Lost equipment recovered where safe and practicable to do so. Where retrieval is not practicable and/or safe, material items (property) lost to the marine environment will undergo an impact assessment and will be added to the inventory for the title.
Physical presence: loss of equipment	<ul style="list-style-type: none"> The seismic vessel may tow up to 14 streamers, approximately 8,000 m in length, which in an unlikely event, could be lost. 	<ul style="list-style-type: none"> Loss of this equipment has the potential to cause minor physical damage to seabed and benthic communities, in the unlikely event that the streamers sink. Given the size of seismic equipment, only a relatively small area of the seabed would be disturbed and no lasting impacts to benthic habitats are expected. In the unlikely event equipment is lost, commercial fisheries and/or other marine users of the Operational Area may be required to make minor diversions to avoid the equipment, until it can be retrieved (if possible). 	<ul style="list-style-type: none"> Comply with regulatory requirements for navigational safety to reduce the likelihood of a collision which could result in loss of equipment. Equipment operated as per predetermined procedures to reduce the likelihood of equipment loss. Lost equipment recovered where safe and practicable to do so. Where retrieval is not practicable and/or safe, material items (property) lost to the marine environment will undergo an impact assessment and will be added to the inventory for the title.

Potential Impact/Risk	Description of Source of Potential Impact/Risk	Description of Potential Impact/Risk	Preliminary Mitigation and/or Management Measures ¹
Unplanned interaction with marine fauna	<ul style="list-style-type: none"> Vessel movements have the potential to result in collisions between the vessel (hull and propeller) and marine fauna. The factors contributing to the frequency and severity of impacts due to collisions vary greatly due to vessel type, vessel operation (specific activity, speed), physical environment (e.g. water depth), and the type of animal potentially present and their behaviour. The seismic vessel will be advancing at low speeds around 4-5 knots (7-9 km) during seismic acquisition. The support vessel(s) travel generally at higher speeds. 	<ul style="list-style-type: none"> Vessel movements have the potential to result in accidental collisions between the vessel (hull and propeller) and marine fauna. The risk of vessel collision with marine mammals is present year-round but is elevated seasonally for species such as humpback whales and pygmy blue whales during migration periods and within migration BIAs. The Operational Area does not overlap with marine mammal BIAs or critical habitat. Given this, and the short duration of activities within the Operational Area, and the slow speeds at which project vessels operate, collisions with marine mammals are considered highly unlikely. It is expected marine turtles will respond to vessel presence by avoiding the immediate vicinity of the vessels, and combined with low vessel speed, this will reduce the likelihood of a vessel-turtle collision. In addition, there are no BIAs or critical habitat to the survival of marine turtles within the Operational Area. 	<ul style="list-style-type: none"> Comply with regulatory requirements for interactions with marine fauna. Streamer tail buoys fitted with appropriate turtle guards or employ a design that doesn't represent an entanglement risk for turtles.
Accidental introduction of invasive marine species (IMS)	<ul style="list-style-type: none"> Vessels transiting to the Operational Area may be subject to marine fouling whereby organisms attach to the vessel hull. IMS could be present as biofouling on the vessel hull or on immovable equipment (e.g. Remotely Operated Vehicle - ROV) and could be translocated to the operational area and transferred directly to the seafloor or subsea structures where they could establish. 	<ul style="list-style-type: none"> It is not credible for IMS to be introduced and established on the seabed or subsea structures in the Operational Area as these deep waters (> 800 m) are not conducive to the settlement and establishment of IMS. There is potential for the transfer of IMS between the project vessels. 	<ul style="list-style-type: none"> Ballast water and biofouling will be managed according to regulatory requirements, including the Australian Ballast Water Management Requirements, and the Australian Biofouling Management Requirements, as applicable. Woodside's IMS risk assessment process will be applied to protect vessels and immovable equipment entering the Operational Area.

Feedback

If you would like to comment on the proposed activities outlined in this information sheet, or would like additional information, please contact Woodside before **17 February 2023** via:

E: Feedback@woodside.com.au
Toll free: 1800 442 977

You can subscribe on our website to receive Consultation Information Sheets for proposed activities: www.woodside.com/sustainability/consultation-activities.

Please note that stakeholder feedback will be communicated to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) as required under legislation. Woodside will communicate any material changes to the proposed activity to affected stakeholders as they arise.

Please note that your feedback and our response will be included in our Environment Plan for the proposed activity, which will be submitted to NOPSEMA for acceptance in accordance with the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2008 (EPGR).

Please let us know if your feedback for the activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA.

1.40 Simplified Consultation Information Sheet (January 2023)



SCARBOROUGH SEISMIC SURVEY

This is a summary of the activity in plain English. More detailed information is included in the Scarborough 4D Baseline Marine Seismic Survey Information Sheet.

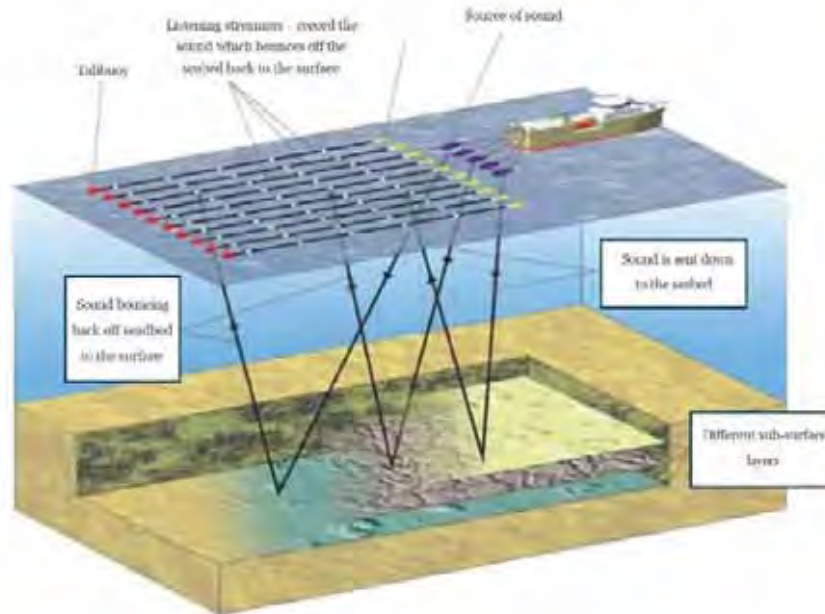
Overview

Woodside plans to conduct a seismic survey over the Scarborough and Jupiter gas fields located in the Erimouth Plateau, approximately 214km northwest of Erimouth. A seismic survey is the study of what is underneath the seabed. This is carried out by sending sound to the bottom of the ocean which then bounces back up to the surface. These sounds are used to generate images of underneath the seafloor.

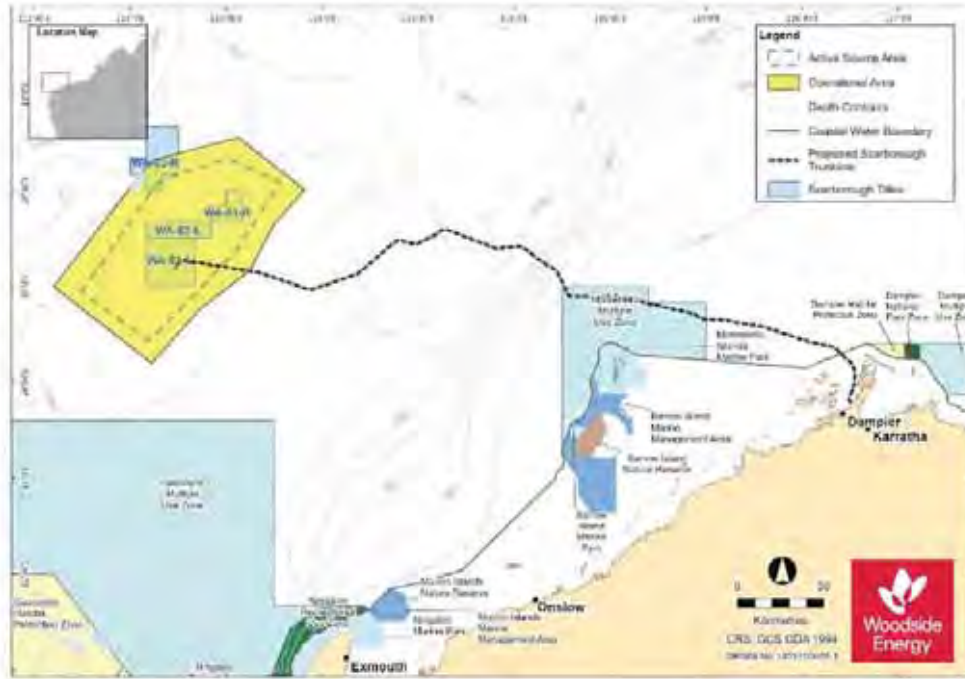
The Scarborough seismic activity involves a survey vessel, accompanied by a support vessel which tows seismic equipment approximately 6km long and up to 1.5km wide.

Woodside is planning to start the seismic survey upon the acceptance of the Environment Plan, and the aim is to start the survey around the first half of 2023. The survey is expected to take up to around 55 to 70 days to complete.

A picture of how a seismic survey is conducted is shown below:



A map showing the location of where the seismic survey will take place is provided below:



Work Method

To conduct the seismic survey, a vessel will sail at a speed of around 4-5 knots (5.5 – 9.2 km/hr). As the vessel travels through the water, equipment is towed behind the vessel which includes sound making and sound receiving equipment. The sound equipment pushes out compressed air that makes sounds underwater, which travels down through the water to the seabed. The sound bounces off different types of rock and sand below the seabed and is sent back up to the surface. This sound is received and recorded by equipment inside the listening streamers which are towed by the vessel. These sounds are then analysed and used to provide images that show the geological structures under the sea floor.

Environmental Impacts and Management

This work program includes Planned Activities but may also result in Unplanned Activities. Both Planned and Unplanned Activities may impact the environment. Woodside manages the work program to reduce impact and risks to as low as practical.

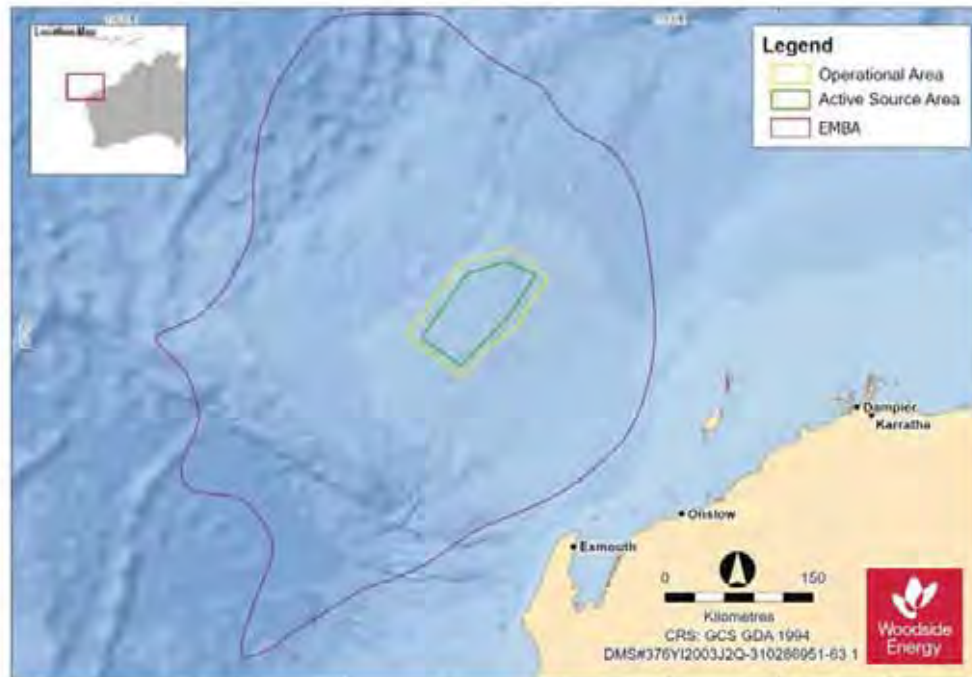
Planned Activities are activities that Woodside knows will happen as part of this work program. For example, Planned Activities will include other marine users being temporarily stopped from accessing the seismic survey area, and the marine and survey vessels used for the work may generate underwater noise, light emissions, atmospheric emissions, and routine discharges (such as sewage, waste, and deck drainage), and other authorised waste.

Unplanned Activities are not planned as part of the work program, but may be the result of an accident, incident, or emergency situation. It is highly unlikely that there will be an Unplanned Activity. Unplanned Activities might include a spill of fuel or oil from a vessel collision, a spill on the deck of a vessel (such as during refuelling), loss of seismic equipment, accidental collision with marine animals, waste entering the environment and accidental introduction of invasive species from outside the region.

A table showing all planned and unplanned activities, potential impacts, and management measures for each is included in the attached information sheet, Table 4.

The total area over which unplanned events could have environmental impacts is shown in the map below. This is referred to as the environment that may be affected (EMBA). The location in which the vessels will operate for the Seismic Survey, known as the Operational Area, is shown on the map below. The location in which the sound will be generated from the seismic survey, known as the Active Source Area, is also shown on the map below. In the highly unlikely event such as a fuel spill from a vessel collision, the entire EMBA will not be affected. The part of the EMBA that is affected will only be known at the time of the event.

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Providing feedback

If you have an interest in the area of the "environment that may be affected" (EMBA) by this work program and would like more information or have any concerns, you can tell Woodside by calling **1800 442 977** or sending an email to feedback@woodside.com.au. Please contact Woodside before **20th February 2023** so your questions or concerns can be considered during the environmental approval process.

If you would prefer to speak to the government directly, they can be contacted on **+61 (0)8 6188 8700** or send an email to communications@npsma.gov.au.

Conclusion

Woodside produces energy that Western Australia, Australia, and the world needs. Woodside has made this energy from its oil and gas projects in Western Australia for over 35 years safely, reliably, and without any major environmental incident. Woodside is very proud of the legacy.

There are always potential risks with projects like this. Woodside has carefully planned this work program so that the risk of environmental impact is reduced to as low as reasonably practical and of an acceptable level. There are also strict government laws in place to protect the environment. Woodside complies with these laws and has systems in place to keep following these laws and rules for each project it undertakes.

If you would like information about Woodside's work to study and care for the environment, you can find it at <https://www.woodside.com/sustainability/environment>.

Further Information

You can find the details Consultation Information Sheet for proposed activity on our website, <https://www.woodside.com/sustainability/consultation-activities>.

1.41 Simplified Overview Consultation Information Sheet (January 2023)



SCARBOROUGH PROJECT

Introduction

This is a summary of some of the work Woodside will be doing for its Scarborough Project. Most of the work will take place in the ocean approximately 37km northwest of Karratha.

Woodside

Woodside has been operating safely for over 35 years, delivering gas and oil to customers in Australia and around the world safely, reliably, and without any major environmental incident. Woodside is very proud of this legacy.

You can find more information about Woodside on our website: www.woodside.com.

Scarborough Project

Scarborough is a gas field under the sea floor about 375 km northwest of Karratha. Woodside plans to bring this gas from Scarborough to Murgoo (the Burnup Peninsula) through a pipeline (called a trunkline) that is approximately 4.5km long, to Woodside's Pluto gas plant.

The map below shows where the Scarborough project, including the trunkline, is located.



You can find more information about the Scarborough project on Woodside's website: <http://www.woodside.com/what-we-do/growth-projects/scarborough>

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Scarborough 4D B1 Marine Seismic Survey Environment Plan

Work for the Scarborough Project

This is an overview of some of the programs which make up the Scarborough project. Woodside is planning to commence work on these programs once the environmental plans have been approved. There will be further work programs that will form part of the Scarborough project.

The current work programs are:

1. Laying the pipeline from the Scarborough gas field to the shore at Muskeg (Barrow Peninsula). The pipeline (called a trunkline) is approximately 410 kilometres long. This is called **Seabed Intervention and Trunkline Installation**.
2. A survey of what is underneath the seabed. These are called **Seismic Surveys**.

3. Drilling and installing the well B and D separators with on the sea floor to extract gas from the Scarborough gas field. This is called **Drilling and Completions**.

4. Installing special end of well equipment on the sea floor and can be carried by a proposed Floating Production Unit (FPU). This is called **Subsea Infrastructure Installation**.

Information sheets for these work programs are available on our website:

<https://www.woodside.com/sustainability/consultation-activities>

www.woodside.com



1.42 Email sent to Ngarluma Aboriginal Corporation (NAC) (20 January 2023)

Good morning [REDACTED]

In follow up to our phone conversation, please find attached, and following, information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that Ngarluma Aboriginal Corporation (NAC) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

If you would like to speak with us, please let us know by **20 February 2023**. Please also let us know how you would like us to engage with you as soon as possible.

If there is any support or specific information that NAC requires to prepare for the meeting, please let me know. In the meantime, I have attached for NAC's review:

1. A Summary Overview of the Scarborough project; and
2. Respective Summary Information sheets

NAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to NAC members as required. Woodside would be pleased to speak with NAC members in addition to the NAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.43 Email sent to Nganhurra Thanardi Garrbu Aboriginal Corporation (NTGAC) (20 January 2023)

Good afternoon ■■■

Thank you again for your time to speak with Woodside staff over the last couple of weeks and for making arrangements for Woodside and Nganhurra Thanardi Garrbu Aboriginal Corporation RNTBC (NTGAC) to meet on 16 February. As discussed, please see attached information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The

Scarborough 4D B1 Marine Seismic Survey Environment Plan

development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on our website, which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that the NTGAC and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

If there is any support or specific information that NTGAC requires to prepare for a meeting, please let me know. We are also happy to discuss appropriate mechanisms for consultation. In the meantime, I have attached for NTGAC's review:

2. A Summary Overview of the Scarborough project; and
3. Respective Summary Information sheets

NTGAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to NTGAC members as required. Woodside would be pleased to speak with NTGAC members in addition to the NTGAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.44 Email sent to Murujuga Aboriginal Corporation (MAC) (20 January 2023)

Good morning [REDACTED]

In follow up to your recent conversation with [REDACTED], please find attached, and following, information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside is seeking to understand the nature of the interests that Murujuga Aboriginal Corporation (MAC) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

I understand that Sharon will be attending the MAC board meeting on **24 January 2023** to discuss this and the previous information we have shared in relation to the Nganhurra Riser Turret Mooring (RTM).

In preparation for the meeting, I have attached for MAC's review:

3. A Summary Overview of the Scarborough project; and
4. Respective Summary Information sheets

MAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to MAC members as required. Woodside would be pleased to speak with MAC members in addition to the MAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.45 Email sent to Nganhurra Thanardi Garrbu Aboriginal Corporation (NTGAC) (27 January 2023)

Hi [REDACTED]

I hope your week is travelling nicely.

I tried to call this morning, just to reach out to see if you require any further information at this point, whether you need anything from Woodside to assist with NTGAC's consideration, or whether you need any assistance to prepare for our meeting on 16/2.

Please feel free to call / email if you need any assistance. I would also be more than happy to meet up if you would like.

Have a great weekend.

[REDACTED]

1.46 Email sent to Wirrawandi Aboriginal Corporation (WAC) (20 January 2023)

Good morning [REDACTED]

In follow up to previous email correspondence from my colleague [REDACTED], please find attached, and following, information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that Wirrawandi Aboriginal Corporation (Wirrawandi) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

I understand you would like to speak with us, on this and in relation to the Nganhurra Riser Turret Mooring (RTM) information that [REDACTED] has already shared. I will reach out to you by phone, on **Monday 23 January** to discuss where you, and your board members would like to meet and to discuss the soonest possible date/time to do so.

If there is any support or specific information that Wirrawandi requires to prepare for the meeting, please let me know. In the meantime, I have attached for Wirrawandi's review:

4. A Summary Overview of the Scarborough project; and
5. Respective Summary Information sheets

WAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to Wirrawandi members as required. Woodside would be pleased to speak with Wirrawandi members in addition to the WAC Board / office holders.

I look forward to connecting with you on Monday, to arrange a meeting and to discuss the logistics of such.

Kind regards

1.47 Email sent to Yinggarda Aboriginal Corporation (YAC) via Yamatji Marlpa Aboriginal Corporation (YMAC) (20 January 2023)

Good afternoon [REDACTED]

Further to recent communications, please find attached information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that Yinggarda Aboriginal Corporation (YAC) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

If you would like to speak with us, please let us know by **20 February 2023**. Please also let us know how you would like us to engage with you as soon as possible.

If there is any support or specific information that YAC requires to prepare for a meeting, please let me know. In the meantime, I have attached for YAC's review:

1. A Summary Overview of the Scarborough project; and
2. Respective Summary Information sheets

YAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to YAC members as required. Woodside would be pleased to speak with YAC members in addition to the YAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.48 Email sent to Yindjibarndi Aboriginal Corporation (20 January 2023)

Good morning [REDACTED]

In follow up to a telephone conversation with my colleague [REDACTED] on 6 January, and her subsequent email correspondence regarding the Nganhurra Riser Turret Mooring (RTM), North West Cape on 18 January, please find attached, and following, information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that Yindjibarndi Aboriginal Corporation (YAC) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

If you would like to speak with us, please let us know by **20 February 2023**. Please also let us know how you would like us to engage with you as soon as possible.

If there is any support or specific information that YAC requires to prepare for a meeting, please let me know. In the meantime, I have attached for YAC's review:

1. A Summary Overview of the Scarborough project; and
2. Respective Summary Information sheets

YAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to YAC members as required. Woodside would be pleased to speak with YAC members in addition to the YAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.49 Email sent to Robe River Kuruma Aboriginal Corporation (RRKAC) (20 January 2023)

Good afternoon [REDACTED]

Further to our recent communications, I attach information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that Robe River Kuruma Aboriginal Corporation (RRKAC) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

If you would like to speak with us, please let us know by **20 February 2023**. Please also let us know how you would like us to engage with you as soon as possible.

If there is any support or specific information that RRKAC requires to prepare for a meeting, please let me know. In the meantime, I have attached for RRKAC's review:

5. A Summary Overview of the Scarborough project; and

6. Respective Summary Information sheets

RRKAC can also provide feedback directly to me on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to RRKAC members as required. Woodside would be pleased to speak with RRKAC members in addition to the RRKAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.50 Email sent to Buurabalayji Thalanyji Aboriginal Corporation (BTAC) (20 January 2023)

Good afternoon [REDACTED]

I hope this email finds you well. I note your recent communications with [REDACTED] and attach information in relation to Woodside's proposed Scarborough gas project.

The Scarborough gas field is located in the Carnarvon Basin, approximately 375 km off the coast of Western Australia. Woodside plans to bring gas from Scarborough to Murujuga (the Burrup Peninsula) through a pipeline that is approximately 430km long, to Woodside's Pluto gas plant. The development of the Scarborough project involves different work programs. An overview of those work programs is included in the attached documents.

In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).

We have a number of detailed Consultation Information Sheets, available on [our website](#), which provide further background on the proposed approaches, including a summary of potential key risks and associated management measures for the primary activity and alternative options.

Woodside is seeking to understand the nature of the interests that Buurabalayji Thalanyji Aboriginal Corporation (BTAC) and its members may have in the 'environment that may be affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet attached.

If you would like to speak with us, please let us know by **20 February 2023**. Please also let us know how you would like us to engage with you as soon as possible.

If there is any support or specific information that BTAC requires to prepare for a meeting, please let me know. In the meantime, I have attached for BTAC's review:

1. A Summary Overview of the Scarborough project; and
2. Respective Summary Information sheets

BTAC can also provide feedback directly to [REDACTED] on the details below, to Feedback@woodside.com.au or by calling 1800 442 977, or directly to the Australian Government's National Offshore Petroleum Safety and Environmental Management Authority to communications@nopsema.gov.au or (08) 6188 8700.

Please feel free to forward this email and, the attached documents to BTAC members as required. Woodside would be pleased to speak with BTAC members in addition to the BTAC Board / office holders.

We look forward to hearing from you.

Kind regards

1.51 Email sent to Buurabalayji Thalanyji Aboriginal Corporation (BTAC) (23 January 2023)

Dear [REDACTED]

I hope this message finds you well.

[REDACTED] mentioned that I sent the below email to the wrong email address. I am sorry about this.

As always, please don't hesitate to contact me if you have any questions. I'll also reach out this week by phone.

Sincerely

[REDACTED]

1.52 Email sent to Australian Border Force (ABF), Director of National Parks (DNP), Australian Maritime Safety Authority (AMSA) – Marine Pollution, Department of Transport (DoT), Department of Biosecurity, Conservation and Attractions (DBCA), Department of Industry, Science and Resources (DISR), Department of Mines, Industry Regulation and Safety (DMIRS), Australian Petroleum Production and Exploration Association (APPEA) (27 January 2023)

Dear Stakeholder

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022

(https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021

(https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021

(https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.

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		provided in Table 2 of the attached D&C EP Consultation Information Sheet.		
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	<p>Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints.</p> <p>Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.</p>	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to

	<ul style="list-style-type: none"> Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 		<p>Consultation Information Sheet for detailed survey location points</p>	<p>manage vessel movements</p> <ul style="list-style-type: none"> An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation Shallow Water Lay Barge Anchor handling vessel/tug Pipe supply vessels Offshore construction vessel Survey vessels Fuel bunkering vessels 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Woodside Feedback

1.53 Email sent to Australian Hydrographic Office (AHO) and Australian Maritime Safety Authority (AMSA) – Marine Safety (27 January 2023)

Dear AHO and AMSA

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

Woodside will make available a shipping lane figure as soon as possible.

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to

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demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities:	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).

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	Q4 2023 pending successful completion approvals, vessel availability and weather constraints.			
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel 	<ul style="list-style-type: none"> Light construction vessels

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at: Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Woodside Feedback

1.54 Email sent to Department of Climate Change, Energy, the Environment and Water (DCCEE) / Department of Agriculture, Fisheries and Forestry (DAFF) – Fisheries and

Department of Agriculture, Fisheries and Forestry (DAFF) – Biosecurity (3 February 2023)

Dear Department of Climate Change, Energy, the Environment and Water (DCCEEW) and Department of Agriculture, Fisheries and Forestry (DAFF)

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

Woodside advises there are a number of historical shipwrecks which have been recorded within the EMBA for the proposed activities. Please find a list relevant to each EP attached. **Also attached are Commonwealth fishery figures.**

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have additional feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Please note this consultation information is of relevance to both DCCEEW and DAFF.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<p>installation or contingent activities</p> <ul style="list-style-type: none"> • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 		<ul style="list-style-type: none"> • Support vessels
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

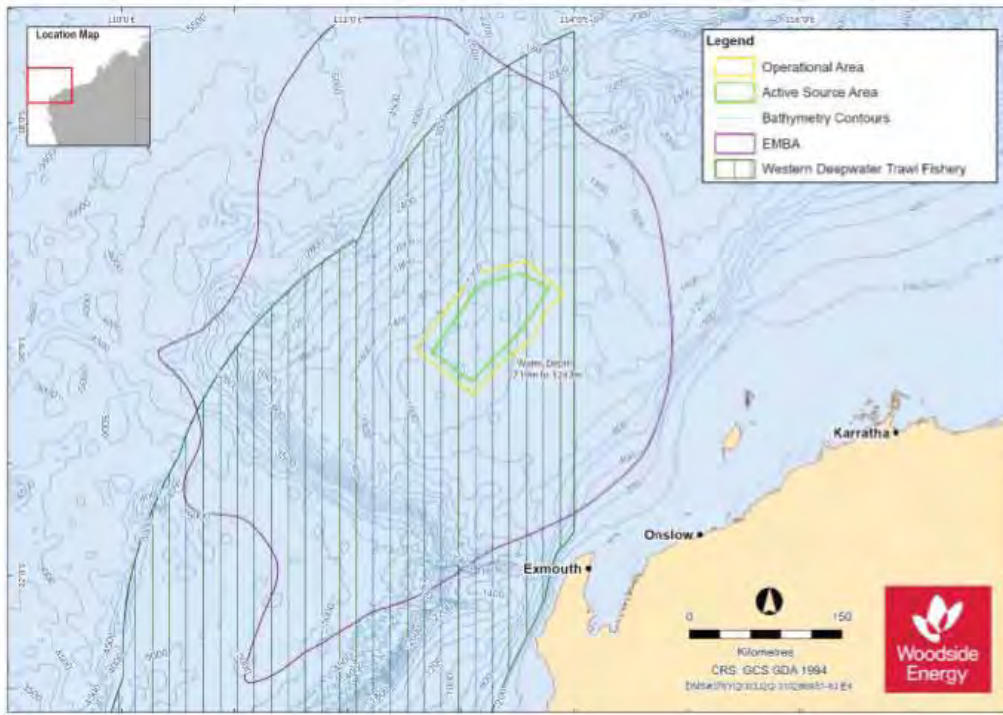
Regards,

APPENDIX A

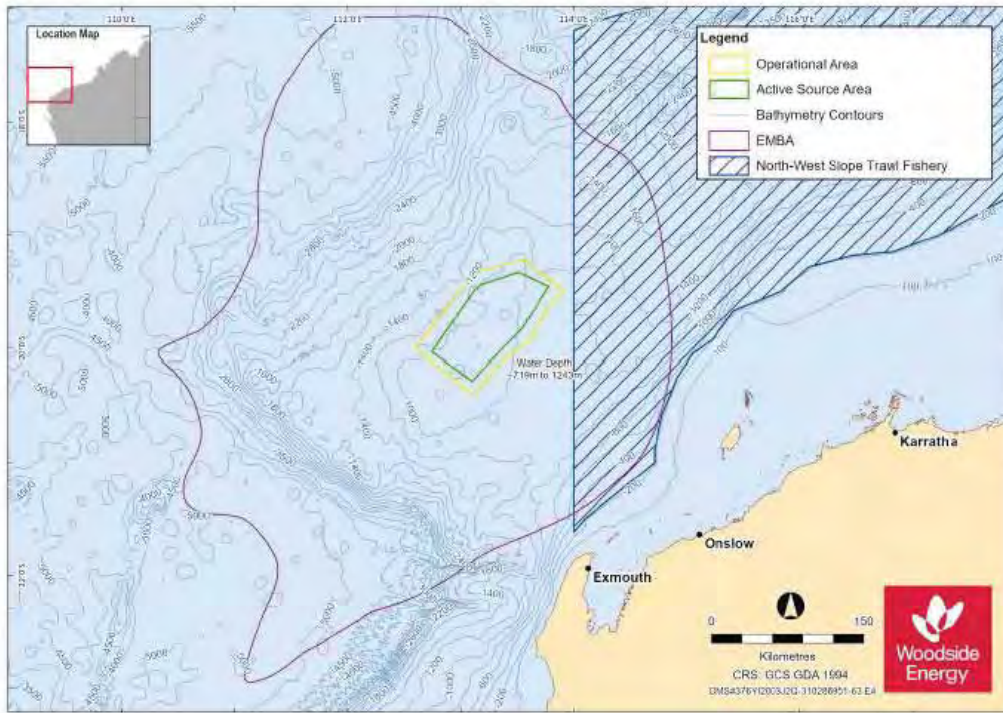
FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D Baseline Marine Seismic Survey EP (Seismic EP)

North West Slope and Trawl Fishery



Western Deepwater Trawl Fishery



1.55 Email sent to Department of Defence (DoD) (27 January 2023)

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**); and
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**).

Woodside is also planning to undertake seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

Woodside is also seeking access to sufficient data or a map of Defence Restricted and Prohibited Areas to inform Woodside's development of defence zone maps and figures for DoD's use.

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational	The closest Commonwealth section of the trunkline on the State waters boundary	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Area to nearest town	is~32 km north-west of Dampier.			
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	general supply/support vessels		
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Feedback:

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Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.56 Email sent to Recfishwest, Marine Tourism WA and WA Game Fishing Association (27 January 2023)

Dear Stakeholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	separate EP covers activities in State waters.			gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> • The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary • Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> • ~83 km north of the Gascoyne Marine Park (Cwlth) • ~206 km north-west of Montebello Marine Park (Cwlth) • ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> • ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> • ~ 77 km north of the Gascoyne Marine Park (Cwlth) • ~ 201 km north-west of Montebello Marine Park (Cwlth) • ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and	Temporary 500 m exclusion zones will apply around applicable seabed intervention and the	A petroleum safety zone of 500 m will be in place around the MODU and	<ul style="list-style-type: none"> • Three nautical mile radius safe navigation area around the seismic vessel, 	The Operational Area for activities includes a radius of:

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Exclusion Zones	<p>Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> • Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. • Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> • DP MODU/drillship – 500 m radius from each well centre • Moored MODU – 4,000 m radius from each well centre. • Installation vessel – 1,500 m radius around subsea locations 	<p>streamers and tail buoys during seismic operations</p> <ul style="list-style-type: none"> • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<ul style="list-style-type: none"> • 1,000 m around location of the outermost concrete pads. • 1,500 m around location of subsea infrastructure. • 2,000 m around future location of FPU. • Temporary 500 m exclusion zone around vessels to manage vessel movements • An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority

Scarborough 4D B1 Marine Seismic Survey Environment Plan

(NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.57 Email sent to Western Gas, Exxon Mobil Australia Resources Company, Shell Australia, Finder Energy, KUFPEC, Santos, OMV Australia / Sapura OMV Upstream (WA), (27 January 2023)

Dear Titleholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has

been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.

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Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	<p>Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints.</p> <p>Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.</p>	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements

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	Commonwealth waters.			<ul style="list-style-type: none"> An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation Shallow Water Lay Barge Anchor handling vessel/tug Pipe supply vessels Offshore construction vessel Survey vessels Fuel bunkering vessels 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.58 Email sent to Chevron Australia and Osaka Gas Gorgon, Tokyo Gas Gorgon, JERA Gorgon via Chevron Australia (27 January 2023)

Dear [REDACTED] and [REDACTED]

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

We would be grateful if you could please forward this consultation information to your Joint Venture participants Osaka Gas Gorgon, Tokyo Gas Gorgon and JERA Gorgon for feedback.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).

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Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels

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	<ul style="list-style-type: none"> • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<p>installation or contingent activities</p> <ul style="list-style-type: none"> • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 		<ul style="list-style-type: none"> • Support vessels
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.59 Email sent to BP Developments Australia, Carnarvon Energy, PE Wheatstone, Kyushu Electric Wheatstone, Eni Australia Ltd, Fugro Exploration, JX Nippon O&G Expln (Australia) (27 January 2023)

Dear Titleholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);

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- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	<p>Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints.</p> <p>Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.</p>	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwth) ~ 201 km north-west of Montebello Marine Park (Cwth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around

	<p>and 1.5 km either side of the proposed trunkline centreline.</p> <ul style="list-style-type: none"> Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<ul style="list-style-type: none"> Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>vessels to manage vessel movements</p> <ul style="list-style-type: none"> An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation Shallow Water Lay Barge Anchor handling vessel/tug Pipe supply vessels Offshore construction vessel Survey vessels Fuel bunkering vessels 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	Seismic EP	Subsea EP

1.60 Email sent to INPEX Alpha (27 January 2023)

Dear Titleholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**); and
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes.

The SITI EP and D&C EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days

Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> • The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary • Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> • ~83 km north of the Gascoyne Marine Park (Cwth) • ~206 km north-west of Montebello Marine Park (Cwth) • ~208 km north-northwest of Ningaloo Marine Park (Cwth) 	<ul style="list-style-type: none"> • ~46 km north of Gascoyne Marine Park Multiple Use Zone
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> • Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. • Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> • DP MODU/drillship – 500 m radius from each well centre • Moored MODU – 4,000 m radius from each well centre. • Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> • Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge 	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June)

	<ul style="list-style-type: none"> • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 		
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP

1.61 Email sent to Wirrawandi Aboriginal Corporation (WAC) (27 January 2023)

Hello [REDACTED]

It was great to connect by phone this morning. I am looking forward to meeting in person in the very near future. I understand from our discussion that your priority at the moment is to prepare for the upcoming Board meeting on the 20th February.

Thank you so much for enabling an opportunity to meet with me on the 21st February whilst you are in Karratha. I will send a separate meeting request with a proposed time for us to have a general catch up on the information we have sent to date on the RTM and Scarborough EMBA's.

It will be great to gain an understanding from you on best way to progress if the Board wish to have further discussions in relation to this information and also on how they may prefer us to engage for any future information shares.

If you have any questions in the meantime please don't hesitate to reach out on the contact details in my signature below.

Kind regards

1.62 Email sent to Buurabalayji Thalanyji Aboriginal Corporation (BTAC) (27 January 2023)

Dear [REDACTED]

Firstly, thank you for your correspondence of 20 February regarding consultations about the Scarborough project. We will respond to this correspondence in the coming days and would be most grateful for the opportunity to meet with you to discuss the matters raised in your letter and our relationship more broadly.

Further to my correspondence of 18 January regarding Woodside's plan to remove the Nganhurra Riser Turret Mooring (RTM), and of 20 January regarding Woodside's Scarborough project, please find attached information about Woodside's decommissioning and drilling activities that we are seeking to consult with Buurabalayji Thalanyji Aboriginal Corporation (BTAC) about.

With the exception of removing the Nganhurra RTM and the Scarborough project, for which Woodside is seeking BTAC's feedback as soon as possible, Woodside is seeking BTAC's feedback on these decommissioning and drilling activities by 17 March. The plain English summary of each of these activities is attached, and I have provided a link to the more detailed consultation information sheets below. These activities are:

Decommissioning Activities:

- Removal of the Nganhurra Riser Turret Mooring (RTM). Information about the RTM was previously emailed on 18 January. For ease of reference, the summary information is attached and the consultation information sheet for the RTM can be found at the link below.
 - [consultation-information-sheet---nganhurra-operations-cessation-environment-plan-revision.pdf \(woodside.com\)](#)
- Stybarrow. This involves two work activities that are subject to separate environment plans; plug and abandonment (P&A) of the wells and decommissioning the infrastructure.
 - [consultation-information-sheet---stybarrow-plug-and-abandonment-environment-plan.pdf \(woodside.com\)](#)
 - [Consultation Information Sheet - Stybarrow Decommissioning Environment Plans \(woodside.com\)](#)
- Griffin decommissioning.
 - [consultation-information-sheet---griffin-decommissioning-environment-plans.pdf \(woodside.com\)](#)

Drilling Activities:

- TPA03 Well Intervention.
 - [Consultation Information Sheet - TPA03 Well Intervention Environment Plan \(woodside.com\)](#)
- WA-34-L Pyxis Drilling and Subsea Installation.
 - [Consultation Information Sheet - WA-34-L Pyxis Drilling and Subsea Installation Environment Plan \(woodside.com\)](#)
- Julimar Appraisal Drilling.
 - [Consultation Information Sheet - Julimar Appraisal Drilling and Survey Environment Plan \(woodside.com\)](#)

We look forward to meeting with you to discuss and respond to the matters raised in your letter, this correspondence, and to discuss other matters important to BTAC and Woodside.

Thank you, [REDACTED], for yours and [REDACTED] consideration and work to progress these important consultations. We are looking forward to working with BTAC.

As always, please feel free to contact me on the details below if you require further information or assistance.

Yours sincerely

1.63 Email sent to Buurabalayji Thalanyji Aboriginal Corporation (BTAC) (27 January 2023)

Hi [REDACTED]

I hope your week is travelling nicely.

I left a message this morning, just to reach out to see if you require any further information about Scarborough or the RTM at this point, or whether you need anything from Woodside to assist with BTAC's consideration.

As always, please call / email if you need anything. I would also be more than happy to meet up if you would like, to brief you on these matters and to plan together how Woodside should best approach consultation.

Have a great weekend.

[REDACTED]

1.64 Email sent to Exmouth Community Liaison Group (1 February 2023)

Dear Exmouth Community Reference Group

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **3 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Earliest commencement date:	<p>Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints.</p> <p>Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.</p>	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwth) ~206 km north-west of Montebello Marine Park (Cwth) ~208 km north-northwest of Ningaloo Marine Park (Cwth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwth) ~ 201 km north-west of Montebello Marine Park (Cwth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the

Scarborough 4D B1 Marine Seismic Survey Environment Plan

				Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **3 March 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.65 Email sent to Commonwealth Fisheries Association (CFA), Australian Southern Bluefin Tuna Industry Association (ASBTIA) and Tuna Australia, North West Slope and Trawl Fishery (4 Licence Holders), Western Deepwater Trawl Fishery (5 Licence Holders) (3 February 2023)

Dear Fishery Stakeholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Consultation Information Sheets are attached, which provide background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). **Also attached are Commonwealth fishery figures.**

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational	The closest Commonwealth section of the trunkline on the State waters boundary	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Area to nearest town	is ~32 km north-west of Dampier.			
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	general supply/support vessels		
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

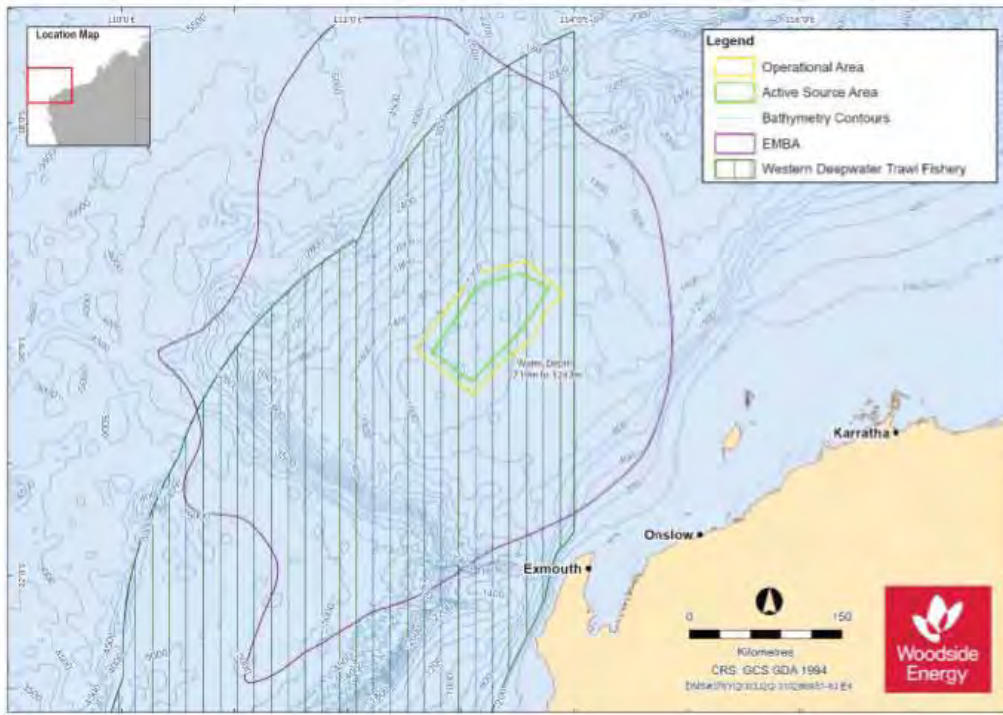
Regards,

APPENDIX A

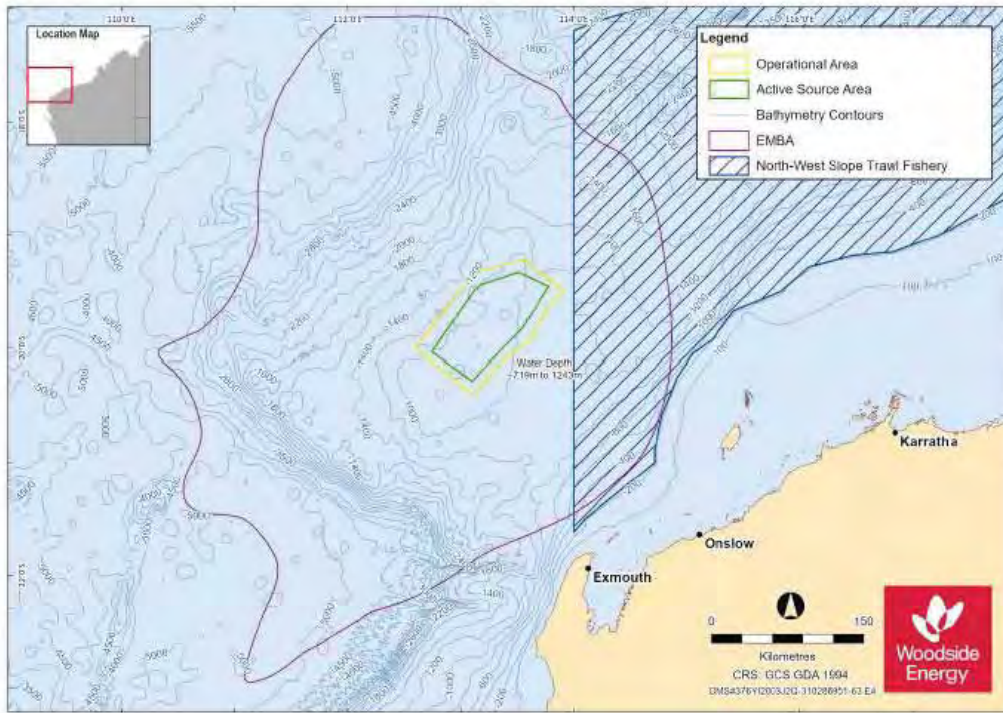
FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D Baseline Marine Seismic Survey EP (Seismic EP)

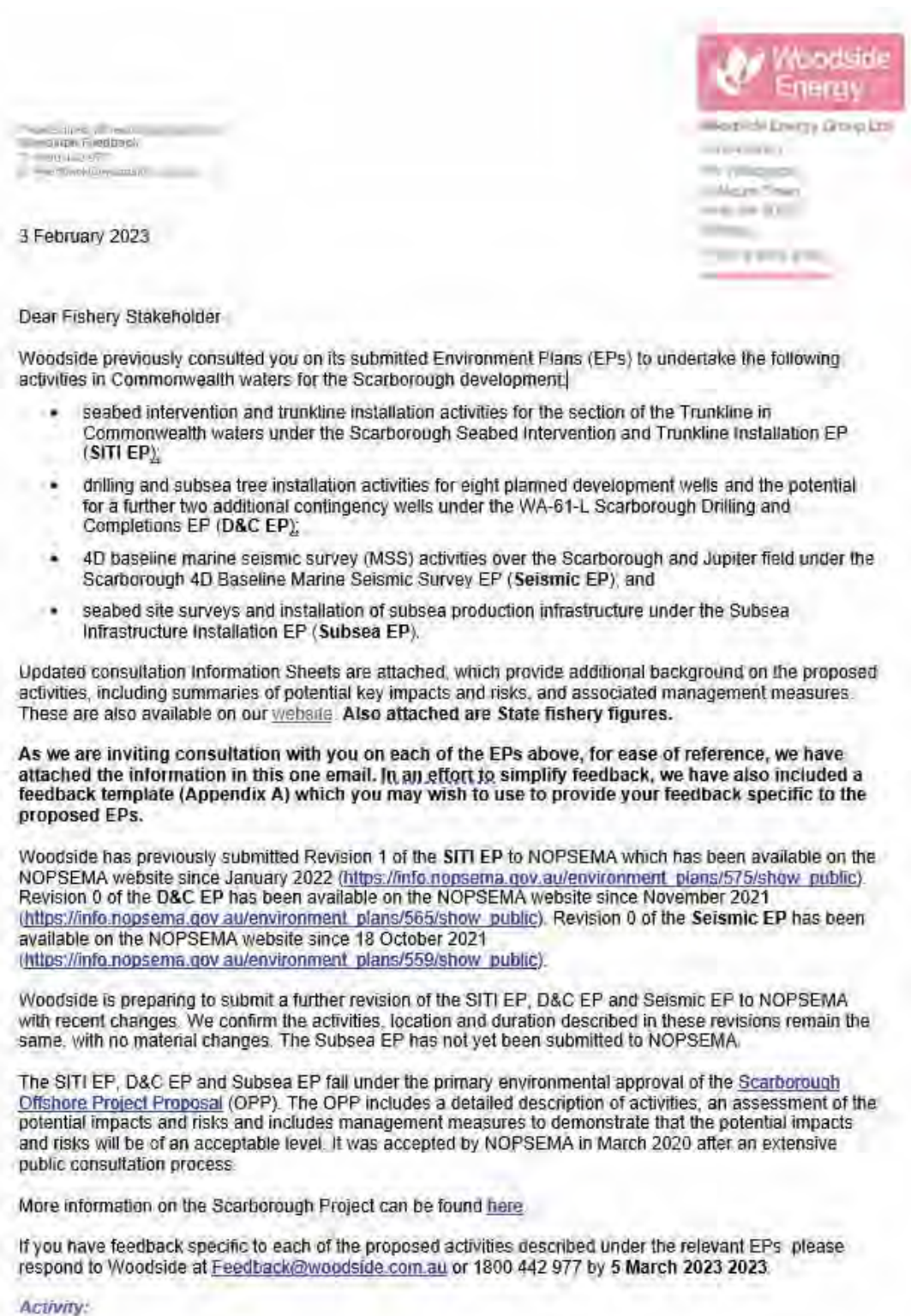
North West Slope and Trawl Fishery



Western Deepwater Trawl Fishery



1.66 Letter sent to Marine Aquarium Managed Fishery (12 Licence Holders), Mackerel Managed Fishery (Area 2 and 3) (43 Licence Holders), West Coast Deep Sea Crustacean Managed Fishery (7 Licence Holders) (3 February 2023)



Scarborough 4D B1 Marine Seismic Survey Environment Plan

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a <u>gravimetry</u> survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km <u>north west</u> of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwth) ~206 km north-west of Montebello Marine Park (Cwth) ~208 km north-northwest of Ningaloo Marine Park (Cwth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwth) ~ 201 km north-west of Montebello Marine Park (Cwth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
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Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	vessels		
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

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Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth)*.

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

Regards,

Woodside Feedback

Woodside Energy
Mia Yellagonga
Kariak, 11 Mount Street
Perth WA 6000
Australia

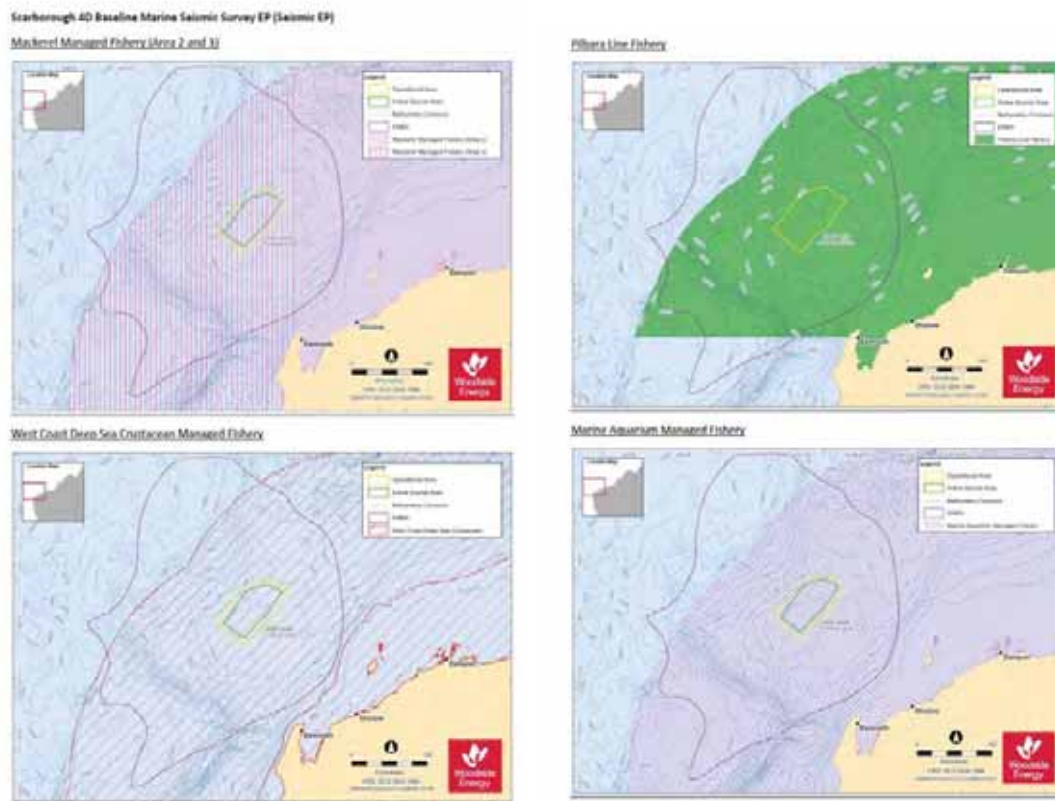
T: 1800 442 977
E: feedback@woodside.com.au
www.woodside.com
f t in v @

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Attached: Consultation Information Sheets for the SITI EP, D&C EP, Seismic EP and Subsea EP; Fishery figures

Scarborough 4D B1 Marine Seismic Survey Environment Plan



1.67 Email sent to Department of Primary Industries and Regional Development (DPIRD) (3 February 2023)

Dear [REDACTED]

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). **Also attached are State fishery figures.**

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Scarborough 4D B1 Marine Seismic Survey Environment Plan

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The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
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Scarborough 4D B1 Marine Seismic Survey Environment Plan

	northern extent of the Dampier Archipelago.	Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	Exmouth, Western Australia.	
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	<p>Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints.</p> <p>Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.</p>	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
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Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<p>435 and 1.5 km either side of the proposed trunkline centreline.</p> <ul style="list-style-type: none"> Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<ul style="list-style-type: none"> Installation vessel – 1,500 m radius around subsea locations 	<p>vessel and third-party vessels</p> <ul style="list-style-type: none"> Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<ul style="list-style-type: none"> Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
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Please provide your views by **5 March 2023**.

Regards,

APPENDIX A

Scarborough 4D B1 Marine Seismic Survey Environment Plan

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D Baseline Marine Seismic Survey EP (Seismic EP)

Mackerel Managed Fishery (Area 2 and 3)



Pilbara Line Fishery



West Coast Deep Sea Crustacean Managed Fishery



Marine Aquaculture Managed Fishery



1.68 Email sent to Western Australian Fishing Industry Council (WAFIC) (3 February 2023)

Dear [REDACTED]

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- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). **Also attached are State fishery figures.**

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have additional feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a

Scarborough 4D B1 Marine Seismic Survey Environment Plan

				gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and	Temporary 500 m exclusion zones will apply around applicable seabed intervention and the	A petroleum safety zone of 500 m will be in place around the MODU and	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, 	The Operational Area for activities includes a radius of:

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Exclusion Zones	<p>Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> • Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. • Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> • DP MODU/drillship – 500 m radius from each well centre • Moored MODU – 4,000 m radius from each well centre. • Installation vessel – 1,500 m radius around subsea locations 	<p>streamers and tail buoys during seismic operations</p> <ul style="list-style-type: none"> • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<ul style="list-style-type: none"> • 1,000 m around location of the outermost concrete pads. • 1,500 m around location of subsea infrastructure. • 2,000 m around future location of FPU. • Temporary 500 m exclusion zone around vessels to manage vessel movements • An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority

Scarborough 4D B1 Marine Seismic Survey Environment Plan

(NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

Regards,

APPENDIX A

<i>FEEDBACK</i>	<i>SITI EP</i>	<i>D&C EP</i>	<i>Seismic EP</i>	<i>Subsea EP</i>

Scarborough 4D Baseline Marine Seismic Survey EP (Seismic EP)

Mackerel Managed Fishery (Area 2 and 3)



Filberts Line Fishery



West Coast Deep Sea Crustacean Managed Fishery



Marine Aquarium Managed Fishery



1.69 Email sent to Exmouth Recreational Marine Users (50 Licence Holders) (3 February 2023)

Dear Stakeholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of

	north of the Dampier Marine Park Habitat Protection Zone	• ~208 km north-northwest of Ningaloo Marine Park (Cwlth)		Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> • Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. • Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> • DP MODU/drillship – 500 m radius from each well centre • Moored MODU – 4,000 m radius from each well centre. • Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> • Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> • 1,000 m around location of the outermost concrete pads. • 1,500 m around location of subsea infrastructure. • 2,000 m around future location of FPU. • Temporary 500 m exclusion zone around vessels to manage vessel movements • An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.70 Email sent to Western Australian Marine Science Institution (WAMSI) (3 February 2023)

Dear [REDACTED]

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022

(https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021
 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021
 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

Woodside is seeking your advice regarding any research activities that WAMSI may be undertaking that may overlap with our proposed activities.

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.

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		planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.		
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	<p>Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints.</p> <p>Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.</p>	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<p>side of the proposed trunkline centreline.</p> <ul style="list-style-type: none"> Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<ul style="list-style-type: none"> Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>around vessels to manage vessel movements</p> <ul style="list-style-type: none"> An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation Shallow Water Lay Barge Anchor handling vessel/tug Pipe supply vessels Offshore construction vessel Survey vessels Fuel bunkering vessels 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

Regards,
Woodside Feedback

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.71 Email sent to Australian Fisheries Management Authority (AFMA) (3 February 2023)

Dear AFMA

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). Also attached are Commonwealth fishery figures.

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have additional feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	availability and weather constraints.			
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<p>subsea hardware installation or contingent activities</p> <ul style="list-style-type: none"> • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Reel-lay vessels • Survey vessels • Support vessels
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at: Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **5 March 2023**.

Regards,

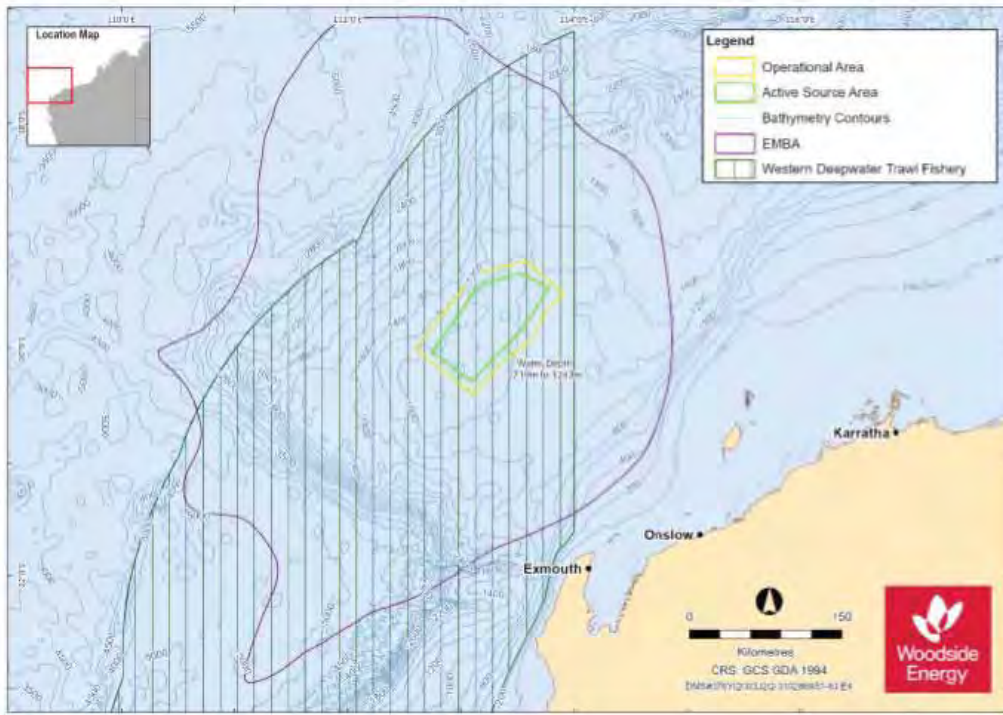
APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

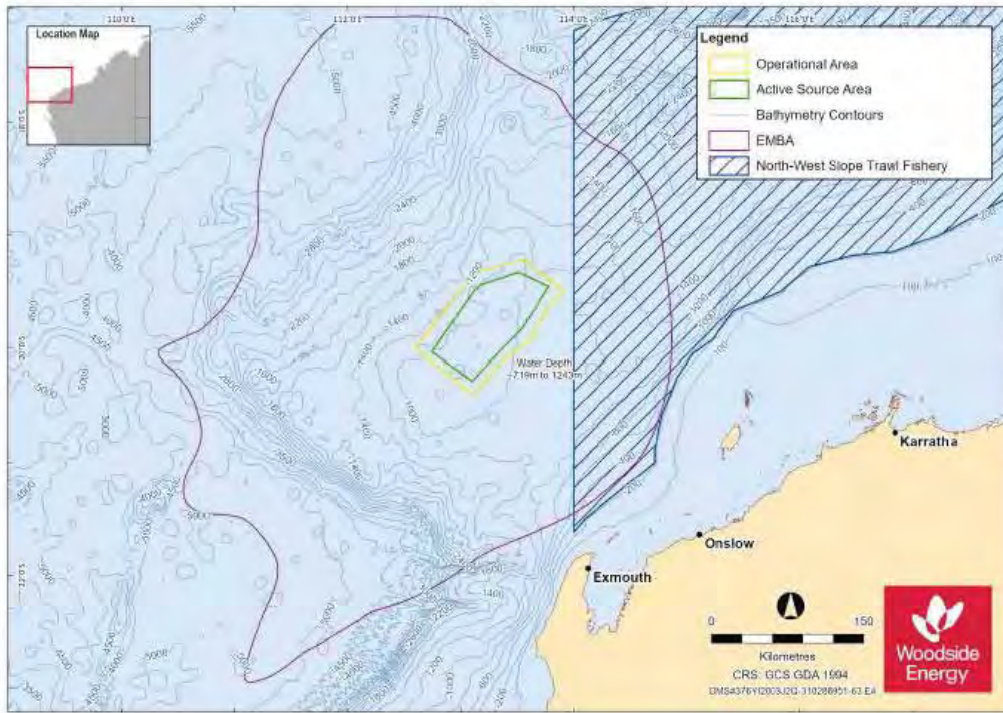
Woodside Feedback

Scarborough 4D Baseline Marine Seismic Survey EP (Seismic EP)

North West Slope and Trawl Fishery



Western Deepwater Trawl Fishery



1.72 Email sent to Pilbara Line Fishery (8 Licence Holders) (3 February 2023)

Dear Fishery Stakeholder

Woodside previously consulted you on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
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- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). **Also attached are State fishery figures.**

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

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More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **5 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
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Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational	The closest Commonwealth section of the trunkline on the State waters boundary	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Area to nearest town	is ~32 km north-west of Dampier.			
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and Exclusion Zones	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities.</p> <p>The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	general supply/support vessels		
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Feedback:

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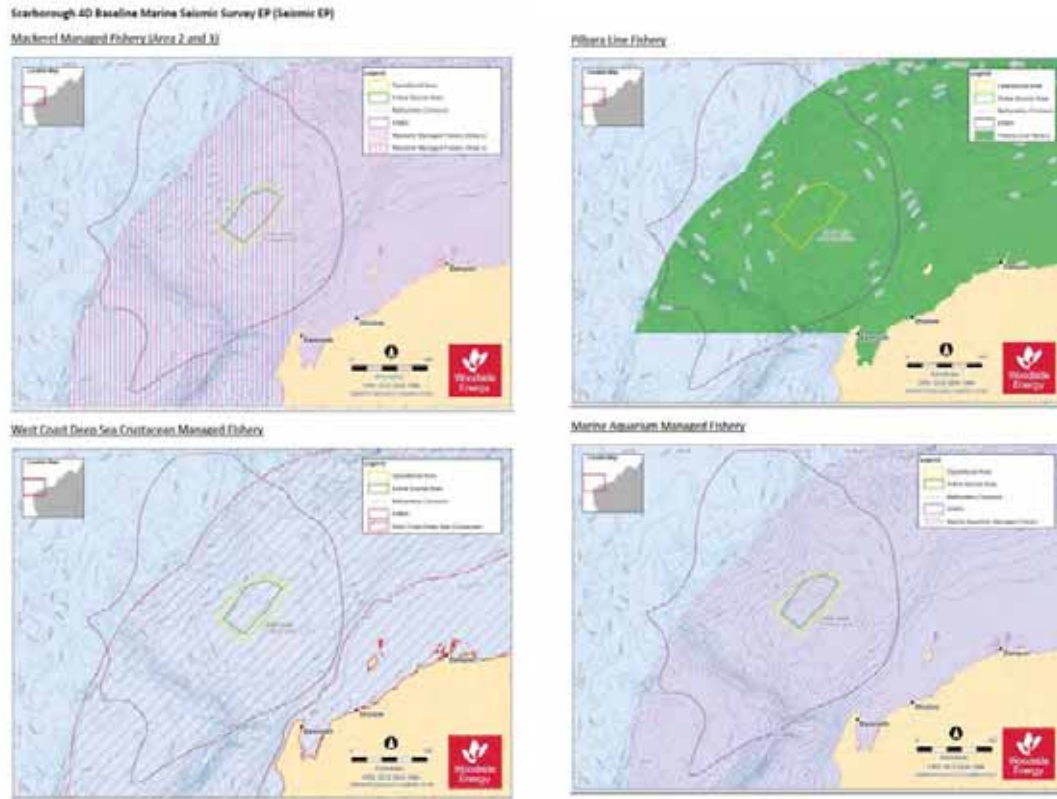
Please provide your views by **5 March 2023**.

Regards,

APPENDIX A

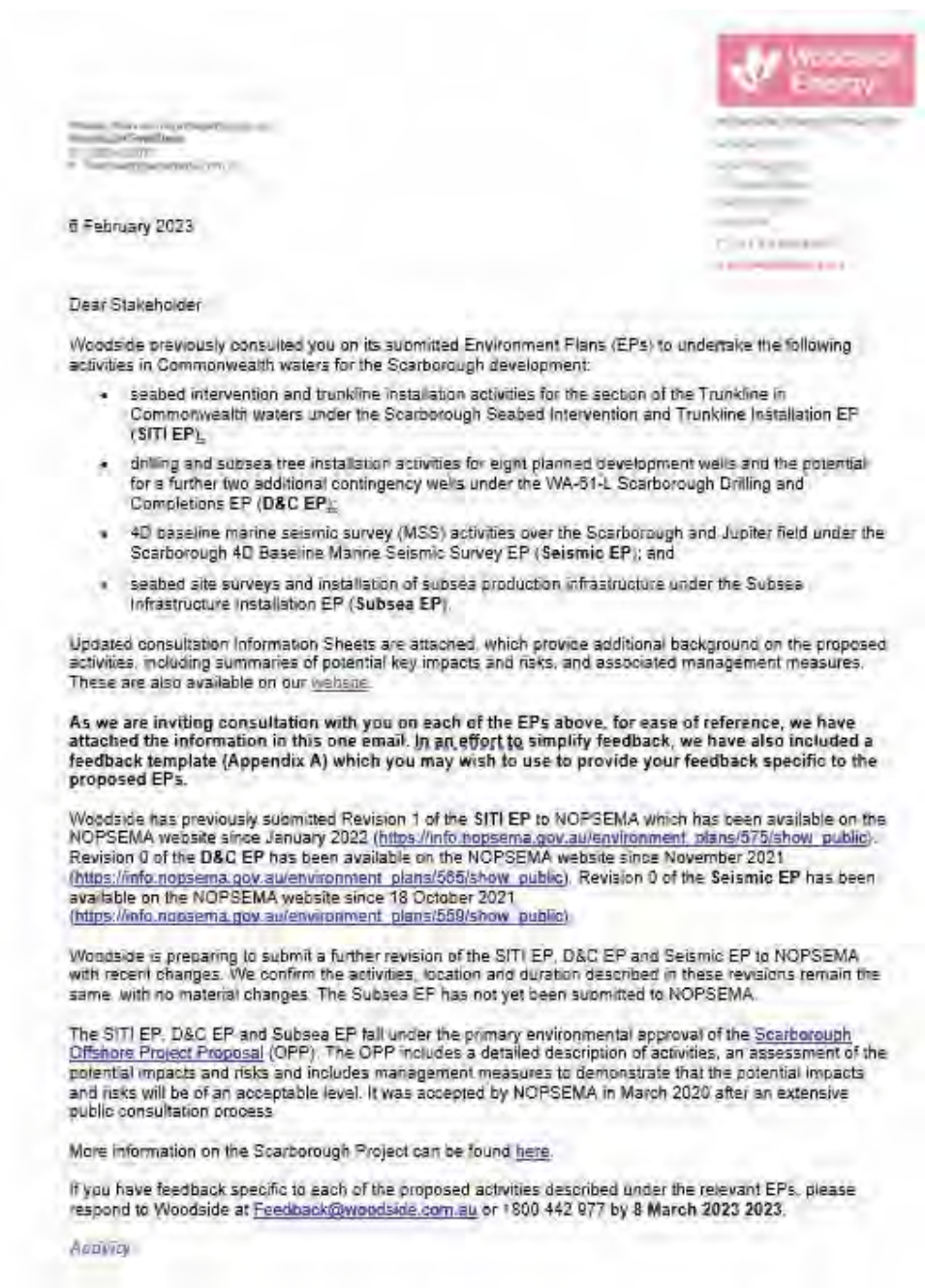
FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Scarborough 4D B1 Marine Seismic Survey Environment Plan



1.73 Letter sent to Gascoyne Recreational Marine Users (65 Licence Holders) (6 February 2023)

Scarborough 4D B1 Marine Seismic Survey Environment Plan



Scarborough 4D B1 Marine Seismic Survey Environment Plan

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravity gravity survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
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Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
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Scarborough 4D B1 Marine Seismic Survey Environment Plan

	<ul style="list-style-type: none"> • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	vessels		
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at: Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth)*

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **8 March 2023**.

Regards,

Woodside Feedback



Woodside Energy
 Mia Yellagonga
 Kariak, 11 Mount Street
 Perth WA 6000
 Australia

T: 1800 442 977
 E: feedback@woodside.com.au
www.woodside.com
 f t in +

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

Attached: Consultation Information Sheets for the SITI EP, D&C EP, Seismic EP and Subsea EP

1.74 Email sent to UWA (6 February 2023)

Dear ■,

Woodside appreciated the opportunity to meet with you in December to discuss the Scarborough development and related Environment Plans (Scarborough EPs).

We understand from our meeting in December 2022 that the proposed Scarborough activities are predominantly outside the scope of interest for UWA. For awareness, Woodside wanted to bring to your attention that it has updated its consultation Information Sheets for the Scarborough EPs, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are attached and are also available on our [website](#).

As Woodside will soon be submitting the proposed EP's, should UWA have any additional feedback on the proposed activities, please let us know by **8 March 2023**. More information on the Scarborough Project can be found [here](#).

Your feedback and our response will be included in the Scarborough EPs which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Regards,

1.75 Email sent to The Australian Institute of Marine Science (AIMS) (6 February 2023)

Dear [REDACTED]

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

Woodside is seeking your advice regarding any research activities that AIMS may be undertaking that may overlap with our proposed activities.

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **8 March 2023**.

Activity:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	D&C EP	Seismic EP	Subsea EP
Summary:	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> • ~83 km north of the Gascoyne Marine Park (Cwlth) • ~206 km north-west of Montebello Marine Park (Cwlth) 	<ul style="list-style-type: none"> • ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> • ~ 77 km north of the Gascoyne Marine Park (Cwlth) • ~ 201 km north-west of Montebello Marine Park (Cwlth)

	<ul style="list-style-type: none"> • ~208 km north-northwest of Ningaloo Marine Park (Cwth) 		<ul style="list-style-type: none"> • ~ 180 km north-northwest of Ningaloo Marine Park (Cwth)
Operational Area and Exclusion Zones	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> • DP MODU/drillship – 500 m radius from each well centre • Moored MODU – 4,000 m radius from each well centre. • Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> • Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> • 1,000 m around location of the outermost concrete pads. • 1,500 m around location of subsea infrastructure. • 2,000 m around future location of FPU. • Temporary 500 m exclusion zone around vessels to manage vessel movements • An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **8 March 2023**.

Regards,

1.76 Email sent to Australian Border Force (ABF), Director of National Parks (DNP), Australian Maritime Safety Authority (AMSA) – Marine Pollution, Department of Industry, Science and Resources (DISR), Department of Mines, Industry Regulation and Safety (DMIRS), Australian Petroleum Production and Exploration Association (APPEA) (22 February 2023)

Dear Stakeholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.77 Email sent to Australian Fisheries Management Authority (AFMA) (22 February 2023)

Dear AFMA

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.78 Email sent to Western Australian Fishing Industry Council (WAFIC) (22 February 2023)

Dear [REDACTED]

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.79 Email sent to Exmouth Recreational Marine Users (50 Licence Holders) (22 February 2023)

Dear Stakeholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.80 Email sent to Yinggarda Aboriginal Corporation (YAC) via Yamatji Marlpa Aboriginal Corporation (YMAC) (22 February 2023)

Dear [REDACTED]

I hope this message finds you well.

Further to my correspondence of 18 January regarding Woodside's plan to remove the Nganhurra Riser Turret Mooring (RTM), and [REDACTED] correspondence of 20 January regarding Woodside's

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Scarborough project, please find attached information about Woodside's decommissioning and drilling activities that we are seeking to consult with Yinggarda Aboriginal Corporation (YAC) about.

With the exception of removing the Nganhurra RTM and the Scarborough project, for which Woodside is seeking YAC's feedback as soon as possible, Woodside is seeking YAC's feedback on these decommissioning and drilling activities by 17 March. The plain English summary of each of these activities is attached, and I have provided a link to the more detailed consultation information sheets below. These activities are:

Decommissioning Activities:

- Removal of the Nganhurra Riser Turret Mooring (RTM). Information about the RTM was previously emailed on 18 January. For ease of reference, the summary information is attached and the consultation information sheet for the RTM can be found at the link below.
 - [consultation-information-sheet---nganhurra-operations-cessation-environment-plan-revision.pdf \(woodside.com\)](#)
- Stybarrow. This involves two work activities that are subject to separate environment plans; plug and abandonment (P&A) of the wells and decommissioning the infrastructure.
 - [consultation-information-sheet---stybarrow-plug-and-abandonment-environment-plan.pdf \(woodside.com\)](#)
 - [Consultation Information Sheet - Stybarrow Decommissioning Environment Plans \(woodside.com\)](#)
- Griffin decommissioning.
 - [consultation-information-sheet---griffin-decommissioning-environment-plans.pdf \(woodside.com\)](#)

Drilling Activities:

- TPA03 Well Intervention.
 - [Consultation Information Sheet - TPA03 Well Intervention Environment Plan \(woodside.com\)](#)
- WA-34-L Pyxis Drilling and Subsea Installation.
 - [Consultation Information Sheet - WA-34-L Pyxis Drilling and Subsea Installation Environment Plan \(woodside.com\)](#)
- Julimar Appraisal Drilling.
 - [Consultation Information Sheet - Julimar Appraisal Drilling and Survey Environment Plan \(woodside.com\)](#)

In providing this information and requests for feedback, I acknowledge [REDACTED] correspondence of 6 February and my response of 10 February in which we discussed arrangements for a meeting between YAC and Woodside. Woodside would be most grateful for the opportunity to meet with YAC, at YAC's earliest convenience, and at a location suitable to YAC. Woodside would also be pleased to provide the resources necessary to hold this meeting and we look forward to receiving a budget for consideration. If there is anything else, we can do at this time to facilitate consultation about these planned work activities please let me know.

Thank you, [REDACTED], for yours, YAC's and YMAC's consideration of these matters and work to progress these important consultations.

As always, please feel free to contact me on the details below if you require further information or assistance.

Yours sincerely

1.81 Email sent to Pilbara Line Fishery (8 Licence Holders) (22 February 2023)

Dear Fishery Stakeholder

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.82 Letter sent to Marine Aquarium Managed Fishery (12 Licence Holders), Mackerel Managed Fishery (Area 2 and 3) (43 Licence Holders), West Coast Deep Sea Crustacean Managed Fishery (7 Licence Holders) (22 February 2023)



Woodside Energy
Woodside Energy Group Ltd
1800 442 977
www.woodside.com

22 February 2023

Dear Fishery Stakeholder

Woodside previously consulted you (correspondence dated 3 February 2023) on its submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**), and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

This correspondence included updated Consultation Information Sheets, which are also available on our website, providing additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures.

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at [Feedback@woodside.com.au](mailto:feedback@woodside.com.au) or 1800 442 977 by **5 March 2023**.

Kind regards,

Woodside Feedback

 Woodside Energy
Mia Yellagonga
Kariak, 11 Mount Street
Perth WA 6000
Australia

T: 1800 442 977
E: feedback@woodside.com.au
www.woodside.com

1.83 Letter sent to Gascoyne Recreational Marine Users (65 Licence Holders) (22 February 2023)



1.84 Email sent to WAMSI (22 February 2023)

Dear [REDACTED]

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,
Woodside Feedback

**1.85 ~~Email sent to Commonwealth Scientific and Industrial Research Organisation (CSIRO)~~
(22 February 2023)**

Repeated

1.86 Email sent to Commonwealth Fisheries Association (CFA), Australian Southern Bluefin Tuna Industry Association (ASBTIA), North West Slope and Trawl Fishery, Western Deepwater Trawl Fishery (22 February 2023)

Dear Fishery Stakeholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.87 Email sent to Recfishwest, Marine Tourism WA and WA Game Fishing Association (22 February 2023)

Dear Stakeholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.88 Email sent to Chevron Australia and Osaka Gas Gorgon, Tokyo Gas Gorgon, JERA Gorgon via Chevron Australia (22 February 2023)

Dear [REDACTED] and [REDACTED]

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.89 Email sent to Western Gas, Exxon Mobil Australia Resources Company, Finder Energy, KUFPEC, Santos, OMV Australia / Sapura OMV Upstream (WA) (22 February 2023)

Dear Titleholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.90 Email sent to National Energy Resource Australia (NERA) Collaborative Seismic Environment Plan Project (CSEP) (22 February 2023)

Dear [REDACTED]

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project.

Woodside wanted to bring to your attention that it has updated its consultation Information Sheet for the Scarborough SITI EP, D&C EP and Subsea EP, which provides additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are attached and also available on our [website](#).

We would appreciate any feedback you may have by **8 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.91 Email sent to Karratha Community Liaison Group (22 February 2023)

Dear Karratha Community Liaison Group

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.92 Email sent to Department of Climate Change, Energy, the Environment and Water (DCCEEW) / Department of Agriculture, Fisheries and Forestry (DAFF) – Fisheries and Department of Agriculture, Fisheries and Forestry (DAFF) – Biosecurity (22 February 2023)

Dear Department of Climate Change, Energy, the Environment and Water (DCCEEW) and Department of Agriculture, Fisheries and Forestry (DAFF)

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **5 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.93 Email sent to Exmouth Community Liaison Group (22 February 2023)

Dear Exmouth Community Reference Group

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **3 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.94 Email sent to BP Developments Australia, Carnarvon Energy, PE Wheatstone, Kyushu Electric Wheatstone, Eni Australia Ltd, Fugro Exploration, JX Nippon O&G Expln (Australia) (22 February 2023)

Dear Titleholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.95 Email sent to INPEX Alpha (22 February 2023)

Dear Titleholder

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **26 February 2023** to support our development of the proposed Environment Plan.

Kind regards,

1.96 Email sent to Commonwealth Scientific and Industrial Research Organisation (CSIRO) (22 February 2023)

Dear CSIRO Enquiries Team, [REDACTED] and [REDACTED],

Woodside is sending this email by way of a reminder that the consultation period is closing soon to provide feedback on Woodside's proposed activities for the Scarborough project. Please see our consultation information below and attached.

We would appreciate any feedback you may have by **8 March 2023** to support our development of the proposed Environment Plan.

Kind regards,

Woodside Feedback

1.97 Letter sent to JX Nippon Oil & Gas Exploration (23 February 2023)

Woodside Energy Services Pty Ltd
 Environmental Services
 11 Scarborough Street
 Scarborough Western Australia

23 February 2023

Dear Titleholder

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our website.

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/550/show_public).


Woodside is preparing to submit a further revision of the SITI EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The DPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found on our website.

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **8 March 2023**.

Activity:



Woodside Energy
 Woodside Energy Group Ltd
 111 St Georges Terrace
 Perth WA 6000
 Australia
 Phone: +61 8 9447 2000
 Fax: +61 8 9447 2001
 Email: info@woodside.com.au

	SITI EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where	Seabed site surveys and installation of subsea production infrastructure. Activities include vital pre- and post-installation

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km <u>north west</u> of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.
Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> • The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary • Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> • ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> • ~ 77 km north of the Gascoyne Marine Park (Cwth) • ~ 201 km north-west of Montebello Marine Park (Cwth) • ~ 180 km north-northwest of Ningaloo Marine Park (Cwth)

Scarborough 4D B1 Marine Seismic Survey Environment Plan

<p>Operational Area and Exclusion Zones</p>	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> • Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. • Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<ul style="list-style-type: none"> • Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> • 1,000 m around location of the outermost concrete pads. • 1,500 m around location of subsea infrastructure. • 2,000 m around future location of FPU. • Temporary 500 m exclusion zone around vessels to manage vessel movements • An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
<p>Vessels:</p>	<p>Seabed Intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline Installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at: Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth)*.

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

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Scarborough 4D B1 Marine Seismic Survey Environment Plan

Please provide your views by **8 March 2023**

Regards,

Woodside Feedback



Woodside Energy
 111 St James Street
 Perth WA 6000
 Australia

T: 1800 442 977
 E: feedback@woodside.com.au
 WWW.WOODSIDE.COM

[f](#) [t](#) [in](#) [v](#) [@](#)

APPENDIX A

FEEDBACK	SITI EP	Seismic EP	Subsea EP

Attached: Consultation Information Sheets for the SITI EP, Seismic EP and Subsea EP

1.98 Email sent to JX Nippon via ENEOS (23 February 2023)

Good Afternoon Mr [REDACTED],

My name is [REDACTED], and I work with Woodside Energy's Corporate Affairs team.

Woodside has submitted Environmental Plans to undertake activities in Commonwealth waters for the Scarborough Development. A part of this involves receiving feedback from title and licence holders. ENEOS (formerly JX Nippon) is one of the aforementioned titleholders.

I have attached the relevant documents, and would appreciate if you could either provide us with feedback within the nominated window, or forward on to the correct person and include Feedback@woodside.com.au and my email, [REDACTED]@woodside.com.au in the correspondence.

Please contact me on [REDACTED] or reply to this email if you require any clarification.

Kind Regards,

1.99 Email sent to Eni Australia (23 February 2023)

Hi [REDACTED],

Thanks for your email.

Please accept this as confirmation that Woodside will provide Eni with commencement and cessation of activity notifications relating to the proposed activities.

Regards

1.100 Email sent to DPIRD (24 February 2023)

Hi [REDACTED],

Thank you for the below feedback with respect to the:

- Scarborough Seabed Intervention and Trunkline Installation EP (SITI EP);

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- Scarborough 4D Baseline Marine Seismic Survey EP (Seismic EP); and
- Subsea Infrastructure Installation EP (Subsea EP).

Woodside has consulted state commercial fishery licence holders and recreational fishery licence holders that are active within the 'environment that may be affected' (EMBA) for each of the proposed activities.

Woodside also provided DPIRD with consultation information relating to the Scarborough Drilling and Completions EP (D&C EP) – re-attached for reference. Should DPIRD have any feedback on the proposed activity we would welcome this by 5 March 2023.

Kind regards,
Woodside Feedback

1.101 Email sent to Ngarluma Aboriginal Corporation (NAC) (24 February 2023)

Good morning [REDACTED] and [REDACTED]

I mentioned I would be sharing more information when we met on Friday 17 February, to discuss the Environmental Plan (EP) information shared with you to date for Scarborough and Nganghurra RTM. This is the email with further information for NAC to consider if they have any interests in the EMBA (Environment that may be affected) relative to the attached information sheets.

It would be greatly appreciated if you could please acknowledge receipt and confirm the opportunity to meet with the NAC board when they are next due to meet on 29 or 30 March. We welcome the opportunity to spend a whole day with the board on a different day if that works.

This email provides information on Woodside's decommissioning and drilling activities that we are seeking to consult with NAC about.

With the exception of removing the Nganhurra RTM and the Scarborough project, for which Woodside is seeking NAC's feedback as soon as possible, Woodside is seeking NAC's feedback on these decommissioning and drilling activities by **17 March** 2023. The plain English summary of each of these activities is attached, and I have provided a link to the more detailed consultation information sheets below. These activities are:

Decommissioning Activities:

- Removal of the Nganhurra Riser Turret Mooring (RTM). Information about the RTM was previously emailed on 20 January. For ease of reference, the summary information is attached and the consultation information sheet for the RTM can be found at the link below.
 - [consultation-information-sheet--nganhurra-operations-cessation-environment-plan-revision.pdf \(woodside.com\)](#)
- Stybarrow. This involves two work activities that are subject to separate environment plans; plug and abandonment (P&A) of the wells and decommissioning the infrastructure.
 - [consultation-information-sheet---stybarrow-plug-and-abandonment-environment-plan.pdf \(woodside.com\)](#)
 - [Consultation Information Sheet - Stybarrow Decommissioning Environment Plans \(woodside.com\)](#)
- Griffin decommissioning.
 - [consultation-information-sheet---griffin-decommissioning-environment-plans.pdf \(woodside.com\)](#)

Drilling Activities:

- TPA03 Well Intervention.
 - [Consultation Information Sheet - TPA03 Well Intervention Environment Plan \(woodside.com\)](#)
- WA-34-L Pyxis Drilling and Subsea Installation.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- [Consultation Information Sheet - WA-34-L Pyxis Drilling and Subsea Installation Environment Plan \(woodside.com\)](#)
- Julimar Appraisal Drilling.
 - [Consultation Information Sheet - Julimar Appraisal Drilling and Survey Environment Plan \(woodside.com\)](#)

In providing this information and requests for feedback, I acknowledge that we are working towards presenting to the NAC board at their next board meeting in March. Woodside would be most grateful for the opportunity to meet with NAC, at NAC's earliest convenience, and at a location suitable to NAC. Woodside would also be pleased to provide the resources necessary to hold this meeting and we look forward to receiving a budget for consideration. If there is anything else, we can do at this time to facilitate consultation about these planned work activities please let me know.

Thank you, [REDACTED] and [REDACTED] for consideration of these matters and work to progress these important consultations.

Please feel free to contact me on the details below if you require further information or assistance.

Regards

1.102 Email sent to Wirrawandi Aboriginal Corporate (WAC) (24 February 2023)

Good morning [REDACTED]

I hope your Friday is going well.

I mentioned I would be sharing more information when we met on Tuesday 21 February, to discuss the Environmental Plan (EP) information shared with you to date for Scarborough and Nganhurra RTM. This is the email with further information for Wirrawandi to consider if they have any interests in the Environment that may be affected (EMBA) relative to the attached information sheets.

It would be greatly appreciated if you could please acknowledge receipt and confirm the opportunity to meet with the Wirrawandi board when they are next due to meet in Perth in March.

This email provides information on Woodside's decommissioning and drilling activities that we are seeking to consult with Wirrawandi about.

With the exception of removing the Nganhurra RTM and the Scarborough project, for which Woodside is seeking Wirrawandi's feedback as soon as possible, Woodside is seeking Wirrawandi's feedback on these decommissioning and drilling activities by **17 March** 2023. The plain English summary of each of these activities is attached, and I have provided a link to the more detailed consultation information sheets below. These activities are:

Decommissioning Activities:

- Removal of the Nganhurra Riser Turret Mooring (RTM). Information about the RTM was previously emailed on 18 January. For ease of reference, the summary information is attached and the consultation information sheet for the RTM can be found at the link below.
 - [consultation-information-sheet---nganhurra-operations-cessation-environment-plan-revision.pdf \(woodside.com\)](#)
- Stybarrow. This involves two work activities that are subject to separate environment plans; plug and abandonment (P&A) of the wells and decommissioning the infrastructure.
 - [consultation-information-sheet---stybarrow-plug-and-abandonment-environment-plan.pdf \(woodside.com\)](#)
 - [Consultation Information Sheet - Stybarrow Decommissioning Environment Plans \(woodside.com\)](#)

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- Griffin decommissioning.
 - [consultation-information-sheet---griffin-decommissioning-environment-plans.pdf \(woodside.com\)](#)

Drilling Activities:

- TPA03 Well Intervention.
 - [Consultation Information Sheet - TPA03 Well Intervention Environment Plan \(woodside.com\)](#)
- WA-34-L Pyxis Drilling and Subsea Installation.
 - [Consultation Information Sheet - WA-34-L Pyxis Drilling and Subsea Installation Environment Plan \(woodside.com\)](#)
- Julimar Appraisal Drilling.
 - [Consultation Information Sheet - Julimar Appraisal Drilling and Survey Environment Plan \(woodside.com\)](#)

In providing this information and requests for feedback, I acknowledge that we are working towards presenting to the Wirrawandi board at their next board meeting in March. Woodside would be most grateful for the opportunity to meet at Wirrawandi's earliest convenience, and at a location suitable to Wirrawandi. Woodside would also be pleased to provide the resources necessary to hold this meeting and we look forward to receiving a budget for consideration. If there is anything else, we can do at this time to facilitate consultation about these planned work activities please let me know.

Thank you, [REDACTED] for consideration of these matters and work to progress these important consultations.

Please feel free to contact me on the details below if you require further information or assistance.

Kind regards

1.103 Email sent to Yindjibarndi Aboriginal Corporation (24 February 2023)

Hello [REDACTED]

I understand you last spoke with [REDACTED] on 25 January regarding the Environmental Plan (EP) information shared with YAC for the Scarborough project activity and Nganghurra RTM.

This email provides further information on Woodside's decommissioning and drilling activities that we are seeking to understand if YAC has any interests in the Environment that may be affected (EMBA) relative to the attached information sheets and if YAC would like us to consult further on these EPs.

With the exception of removing the Nganghurra RTM and the Scarborough project, for which I understand YAC has verbally advised they have no interests, Woodside is also seeking YAC's feedback on these decommissioning and drilling activities by **17 March 2023**.

The plain English summary of each of these activities is attached, and I have provided a link to the more detailed consultation information sheets below. These activities are:

Decommissioning Activities:

- Stybarrow. This involves two work activities that are subject to separate environment plans; plug and abandonment (P&A) of the wells and decommissioning the infrastructure.
 - [consultation-information-sheet---stybarrow-plug-and-abandonment-environment-plan.pdf \(woodside.com\)](#)
 - [Consultation Information Sheet - Stybarrow Decommissioning Environment Plans \(woodside.com\)](#)
- Griffin decommissioning.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- [consultation-information-sheet---griffin-decommissioning-environment-plans.pdf \(woodside.com\)](#)

Drilling Activities:

- TPA03 Well Intervention.
 - [Consultation Information Sheet - TPA03 Well Intervention Environment Plan \(woodside.com\)](#)
- WA-34-L Pyxis Drilling and Subsea Installation.
 - [Consultation Information Sheet - WA-34-L Pyxis Drilling and Subsea Installation Environment Plan \(woodside.com\)](#)
- Julimar Appraisal Drilling.
 - [Consultation Information Sheet - Julimar Appraisal Drilling and Survey Environment Plan \(woodside.com\)](#)

Thank you for your time in considering these matters. We look forward to hearing from you.

Please feel free to contact me on the details below if you require further information or assistance.

Kind regards

1.104 Email sent to Robe River Kuruma Aboriginal Corporation (RRKAC) (24 February 2023)

Hello [REDACTED]

I understand you met with [REDACTED] on 31 January regarding the Environmental Plan (EP) information shared with Robe River Kuruma Aboriginal Corporation (RRKAC) for the Scarborough project activity and Nganhurra RTM and that this information was to be presented at the RRKAC Board meeting this week 21-22 February. Ju-Lin advised we have a number of EPs we will reach out to RRKAC on.

This email provides further information on Woodside's decommissioning and drilling activities that we are seeking to understand if RRKAC has any interests in the Environment that may be affected (EMBA) relative to the attached information sheets and if RRKAC would like us to consult further on these EPs.

With the exception of removing the Nganhurra RTM and the Scarborough project, for which Woodside would appreciate feedback on as soon as possible, Woodside is also seeking RRKAC's feedback on these decommissioning and drilling activities by **17 March 2023**.

The plain English summary of each of these activities is attached, and I have provided a link to the more detailed consultation information sheets below. These activities are:

Decommissioning Activities:

- Stybarrow. This involves two work activities that are subject to separate environment plans; plug and abandonment (P&A) of the wells and decommissioning the infrastructure.
 - [consultation-information-sheet---stybarrow-plug-and-abandonment-environment-plan.pdf \(woodside.com\)](#)
 - [Consultation Information Sheet - Stybarrow Decommissioning Environment Plans \(woodside.com\)](#)
- Griffin decommissioning.
 - [consultation-information-sheet---griffin-decommissioning-environment-plans.pdf \(woodside.com\)](#)

Drilling Activities:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- TPA03 Well Intervention.
 - [Consultation Information Sheet - TPA03 Well Intervention Environment Plan \(woodside.com\)](#)
- WA-34-L Pyxis Drilling and Subsea Installation.
 - [Consultation Information Sheet - WA-34-L Pyxis Drilling and Subsea Installation Environment Plan \(woodside.com\)](#)
- Julimar Appraisal Drilling.
 - [Consultation Information Sheet - Julimar Appraisal Drilling and Survey Environment Plan \(woodside.com\)](#)

Thank you for your time in considering these matters. We look forward to hearing from you.

Please feel free to contact me on the details below if you require further information or assistance.

1.105 Email sent to AMSA (Marine Safety) (28 February 2023)

Dear AMSA,

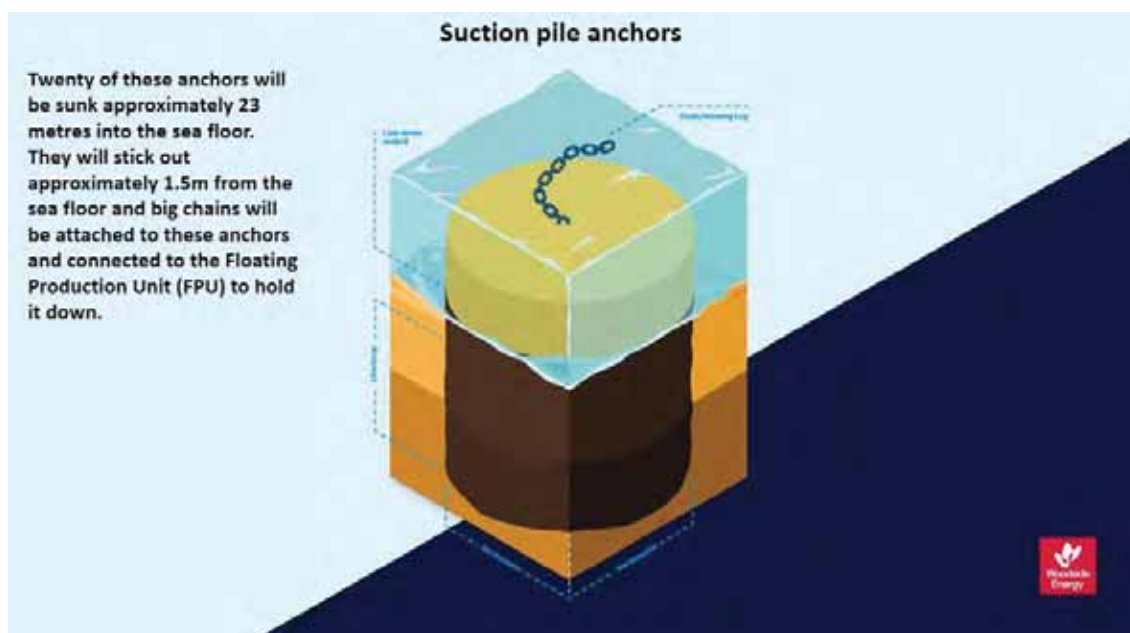
Thankyou for your email correspondence and feedback on the Scarborough Environment Plan activities. We also thankyou for providing the AIS data and vessel traffic plot.

Please see below in response to the additional information you have requested:

- 1) *Please provide information on how high in the water column the moorings actually are and whether they could obstruct shipping traffic.*

The intention is that moorings for the Floating Production Unit (FPU) will be installed prior to FPU arrival within the Operational Area under the Subsea EP (see Figure 4 below), in water depths of approximately 900-1000m. Each of the 20 moorings legs will be composed of both wire and chain components and extend approximately 1650m from the FPU, connected to a suction pile anchor. The suction piles are ~24 m high by ~8 m diameter, which will be buried with only the top exposed above the seabed (i.e. once installed ~23 m will be buried, with ~ 1-2m remain protruding above the seabed) (see Schematic below).

Note - the Scarborough moorings depicted on AMSA's "Scabroorugh_joint_venture-2023.pdf" are not a component of the Scarborough EPs which are the subject of ongoing consultation. These appear to be metocean moorings that have since been recovered.



2) *When will Woodside send through its shipping lane figure, as stated in your original email, and what will that depict?*

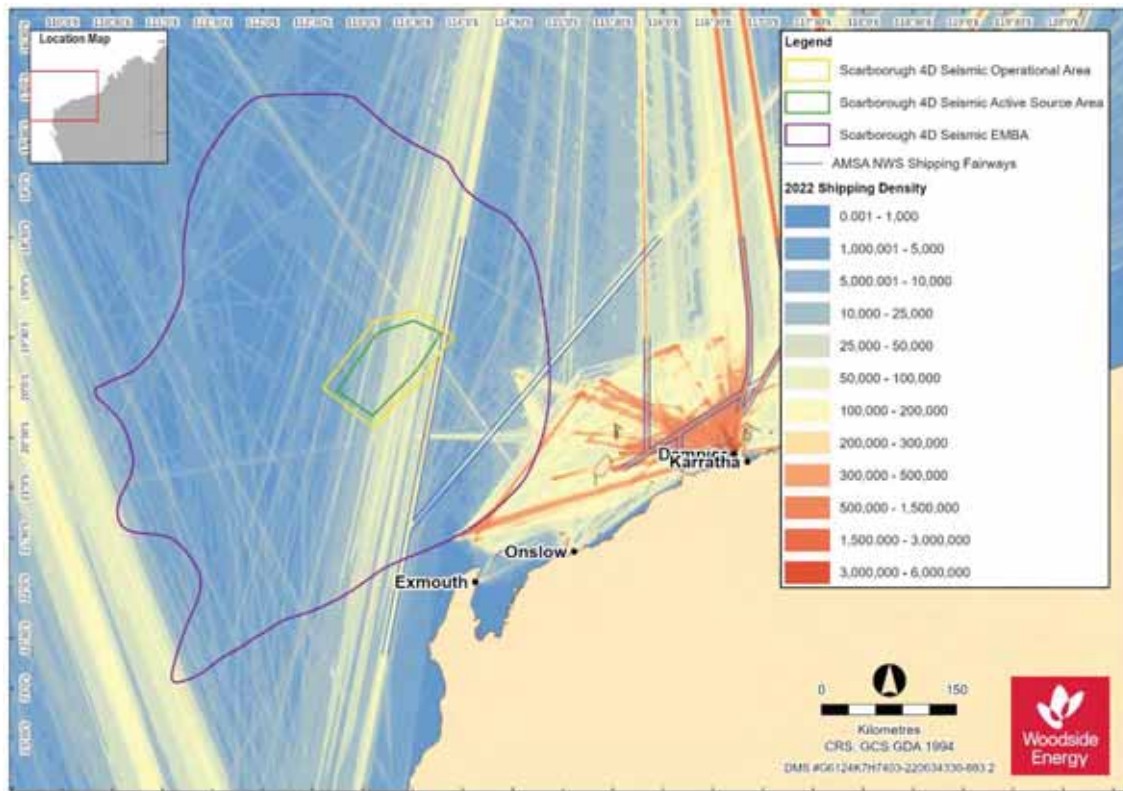
The Shipping Lane figure for each EP's as relevant to their Petroleum Activities Program and associated Operational Area are provided attached. A separate figure showing the Environment that May Be Affected (EMBA) for each activity has also been attached for reference.

Please let us know should you have any questions regarding the above or require further information relating to any of the Scarborough activities.

Kind Regards,

Woodside Feedback

1.106 Updated Shipping lanes map sent to AHO and AMSA (28 February 2023, corrected and resent 8/9 March 2023)



1.107 Email sent to DNP (8 March 2023)

Dear DNP,

Thank you for your feedback on the proposed Scarborough EPs. We note and acknowledge the comments already provided by DNP previously on each of the relevant EPs and that DNP has no further comment or objections and claims. Copies of your previous responses have been received and have been addressed where relevant within each of the proposed EPs.

In response to your request for clarification on the OAs for each activity, please see the following information below:

Scarborough 4D B1 Marine Seismic Survey EP:

The Operational Area includes both the Active Source Area and a surrounding buffer for the purpose of vessel line turns and other vessel manoeuvres. The seismic source will not be discharged within this buffer.

Scarborough Seabed Intervention and Trunkline Installation EP:

The Operational Area defines the spatial boundary of the Petroleum Activities Program, as described, risk assessed and managed by this EP, including vessel related petroleum activities within the Operational Area. For the purposes of this EP, the Operational Area includes the following Project Areas:

- Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline which allows for the movement and positioning of vessels and includes Spoil Ground 5A.

- Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters.

WA-61-L Scarborough Drilling and Completions EP:

For the purposes of this EP, the following Operational Areas will apply:

- For a dynamically positioned (DP) MODU, the Operational Area encompasses a radius of 500 metre (m) from each well centre, in which drilling related petroleum activities will take place and will be managed under this EP.
- For a moored MODU, the Operational Area encompasses a radius of 4000 m from each well centre, in which drilling related petroleum activities will take place and will be managed under this EP. This increased Operational Area allows for temporary installation of moorings. Noting that the Operational Area will be limited to the western boundary of Permit Area WA-61-L.
- For the installation activities, the Operational Area encompasses a radius of 1500 m around subsea locations, in which subsea installation activities will take place and will be managed under this EP. The 1500 m (radius) Operational Area around subsea installation allows for the movement and positioning of large vessels.

The Operational Area for drilling activities includes a 500 m petroleum safety zone around the MODU to manage vessel movements. The 500 m petroleum safety zone is under the control of the MODU Person in Charge.

WA-61-L and WA-62-L Subsea Infrastructure Installation Environment Plan:

For the purposes of this EP, the following Operational Area will apply:

- For the gravimetry activities, the Operational Area encompasses a radius of 1000 m around location of the outermost concrete pads, in which gravimetry preparation and survey activities will take place and will be managed under this EP. The 1000 m (radius) Operational Area around subsea installation allows for the movement and positioning of vessels.
- For the subsea installation activities, the Operational Area encompasses a radius of 1500 m around location of subsea infrastructure, in which subsea installation activities will take place and will be managed under this EP. The 1500 m (radii) Operational Area around subsea installation allows for the movement and positioning of vessels.
- For the mooring pre-lay activities, the Operational Area encompasses a radius of 2000 m around future location of FPU, in which mooring pre-lay activities will take place and will be managed under this EP. The 2000 m (radius) Operational Area around future FPU location allows for moorings to be deployed and the movement and positioning of vessels.

Please let us know should you have any questions regarding the above or require further information relating to any of the Scarborough activities.

Kind Regards,

Woodside Feedback



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: 1800 442 977
E: feedback@woodside.com.au
W: www.woodside.com
f t in v i

1.108 Email sent to AMSA (8 March 2023)

Dear AMSA,

The Scarborough FPU shall be located in the Scarborough Field Petroleum Activity Area (PAA) in approximately 952 m of water (refer to coordinates in below table).

Location and Water Depth of Scarborough FPU

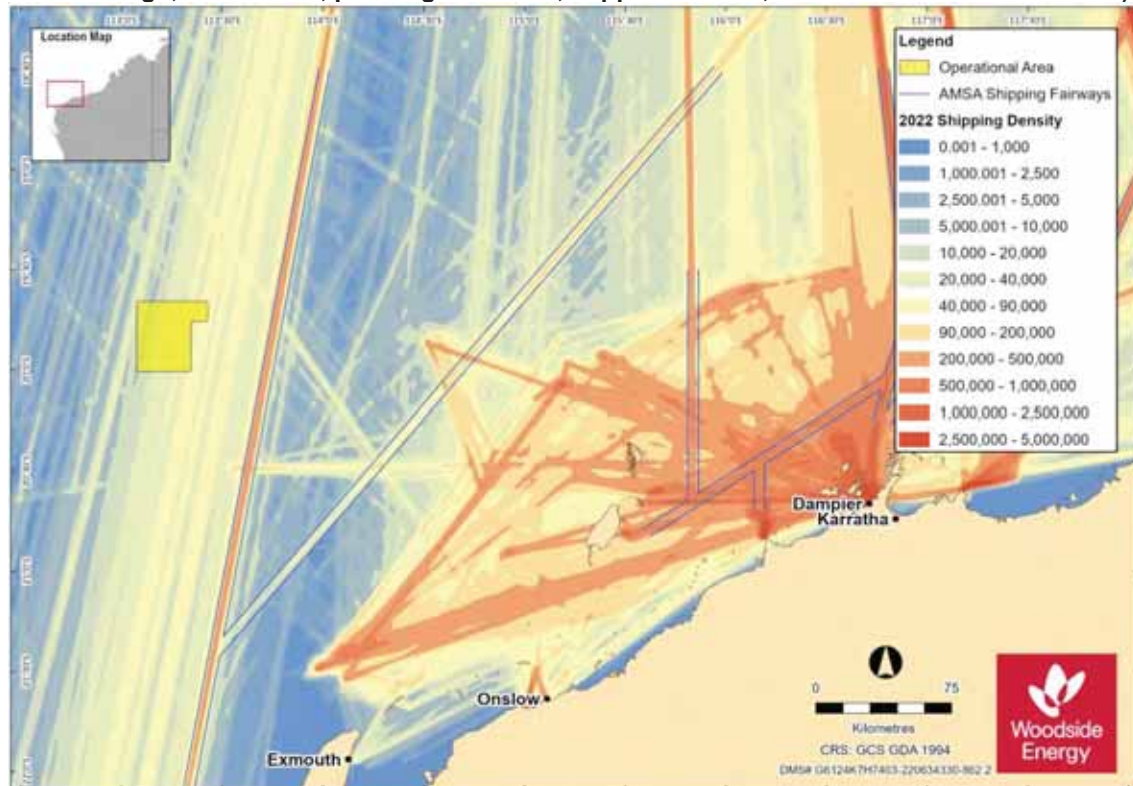
Water Depth (m below MSL)	Northing/ Latitude	Easting/ Longitude	Ref. Grid
952	7,792,300 m N	106.450 m E	MGA94 Grid 50K, 117°E
Cartesian: 19°55'33.7" South 113°14'29.8" East			

The FPU comprises a semi-submersible hull and integrated topsides with the following key components;

- Semi-submersible hull with integrated storage tanks, ballast and bilge systems;
- Risers, umbilicals and mooring system (20 mooring chains connected to suction piles on the seabed); and
- An integrated topsides supporting gas processing systems and equipment, flare systems, utilities, cranes, laydown and storage areas, Utility Building (UB), Living Quarters (LQ) and helideck.

AMSA has introduced a network of marine fairways across the NWMR off WA to reduce the risk of vessel collisions with offshore infrastructure. It is noted that none of these fairways intersect with the PAA; the nearest fairway is approximately 38 km east of the PAA (figure below). Vessel tracking data suggest the majority of shipping is concentrated to the east of the PAA.

Vessel density map for the PAA, derived from AMSA satellite tracking system data (vessels include cargo, LNG tanker, passenger vessels, support vessels, and others/unnamed vessels)



The environment that may be affected (EMBA) is the largest spatial extent where the Petroleum Activities Program could potentially have an environmental consequence (direct or indirect impact). The broadest extent of the EMBA takes into consideration planned and unplanned activities, and for this Environment Plan (EP) is determined by a highly unlikely release of marine diesel to the

environment as a result of vessel collision. The EMBA does not represent the extent of predicted impact of the highly unlikely marine diesel release. Rather, the EMBA represents the merged area of many possible paths a highly unlikely hydrocarbon release could travel depending on the weather and ocean conditions at the time of the release. This means in the highly unlikely event a hydrocarbon release does occur, the entire EMBA will not be affected and the specific and minimal part of the EMBA that is affected will only be known at the time of the release.

In addition to the above responses, please find attached an updated Shipping Density map for the Scarborough Seismic EP showing the correct EMBA profile. Please disregard the previous version of this map provided on 28 February 2023.

Please let us know should you have any questions regarding the above or require further information relating to any of the Scarborough activities.

Kind Regards,

Woodside Feedback



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: 1800 442 977
E: feedback@woodside.com.au
W: www.woodside.com
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1.109 Email sent to JX Nippon Oil & Gas Exploration (10 March 2023)

Dear [REDACTED] and [REDACTED],

Woodside is sending this email by way of a reminder that the consultation period has closed to provide feedback on the following proposed activities in Commonwealth waters:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**).
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**).
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

The feedback period is also closing soon for the following proposed activities in Commonwealth waters:

- activities on the TPA03 production well to remediate a down-hole valve and continue production from the lower reservoir, under the TPA03 Well Intervention Environment Plan (**TPA03 EP**);
- geotechnical and geophysical surveys, drilling and appraisal of the Julimar South-1 well (previously called JULA-P) and, plug and abandonment of Julimar South-1, if required, under the Julimar Drilling and Surveys Environment Plan (**Julimar EP**).
- drilling and subsea infrastructure installation activities for one well (PLA08) and contingent well intervention activities for current production wells, under the WA-34-L Pyxis drilling and Subsea Installation Environment Plan Revision (**PLA08 EP**).
- subsea decommissioning activities for the Griffin field under the **Griffin Decommissioning and Field Management EP**, **Griffin Gas Export Pipeline EP** and **Griffin Field Deviation EP**.
- subsea decommissioning activities for the Stybarrow field under the **Stybarrow Plug and Production EP**, **Stybarrow Decommissioning and Field Management EP** and **Stybarrow Field Deviation EP**.

Please find the attached Consultation Information Sheets relating to the above proposed environment plans (EPs). The Consultation Information Sheets provide background on the proposed activities, including maps, summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). You can also subscribe to receive updates on our consultation activities by subscribing [here](#).

Should JX have feedback on the proposed activities, please let us know. Feedback received after the feedback dates (see emails attached) will continue to be assessed and responded to, as required, through the life of the relevant EP.

As we have invited consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to these locations, please respond to Woodside at: Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plans which will be submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Woodside Feedback

1.110 Email sent to DoD (13 March 2023)

Good afternoon [REDACTED],

Thank you for the Department of Defence's feedback regarding the Scarborough SITI EP, D&C EP, Seismic EP and Subsea EPs, including providing a copy of its restricted airspace and Defence Training Areas off the WA Coast.

In line with Woodside's previous response to the Department of Defence's feedback in relation to the proposed activities, Woodside re-confirms that it notes the Department's advice on the location of the Operational Area and the presence of the North West Exercise Area (NWXA) and restricted airspace.

We also note your advice with respect to the location, identification, removal, or damage to equipment from unexploded ordinances (UXOs).

Please accept this as confirmation that:

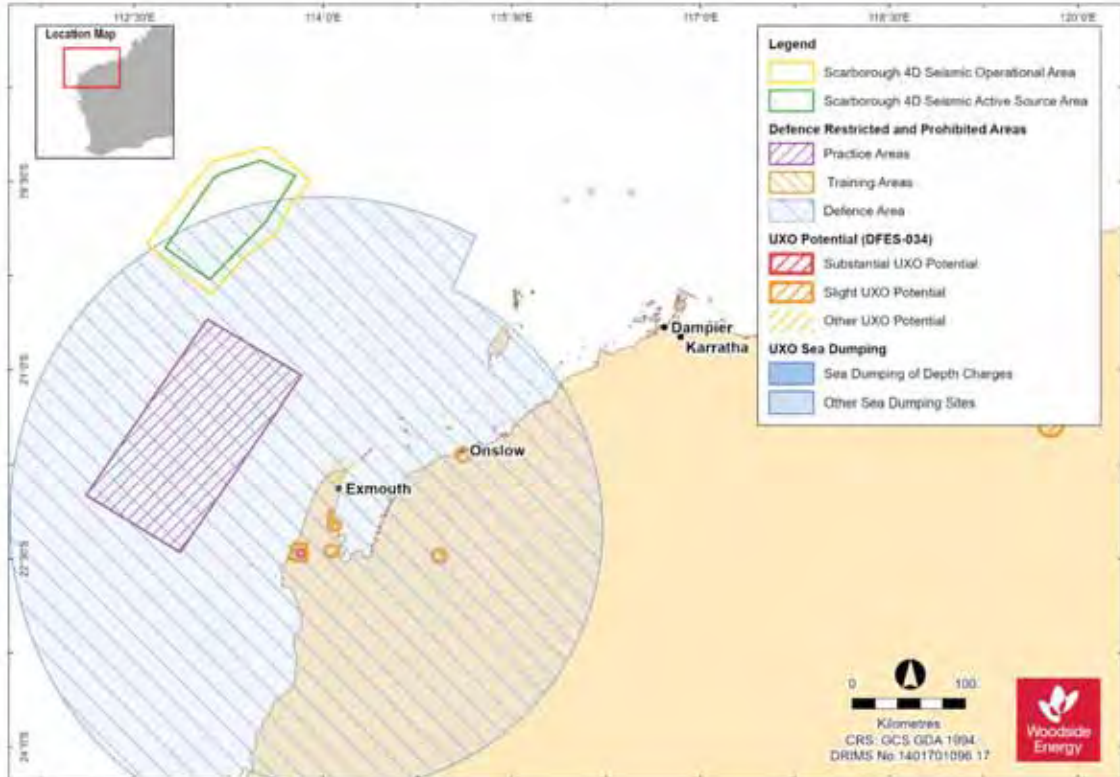
- Woodside will notify the Department of Defence at least five weeks prior to the commencement of activities.
- Woodside notes the requirement and contact details provided by the Department of Defence to engage with Airservices Australia if the restricted airspace is activated. Woodside will confirm restricted air space status with the Department of Defence as part of its commencement of activity notification.
- AHO has already been engaged for this activity and is included in our activity notification protocols. At its request, AHO will be notified four weeks prior to the start of activities.

The Defence figures for each of the proposed EPs as relevant to their Petroleum Activities Program and associated Operational Areas is attached. A separate figure showing the Environment that May Be Affected (EMBA) is also attached for reference.

Kind regards,

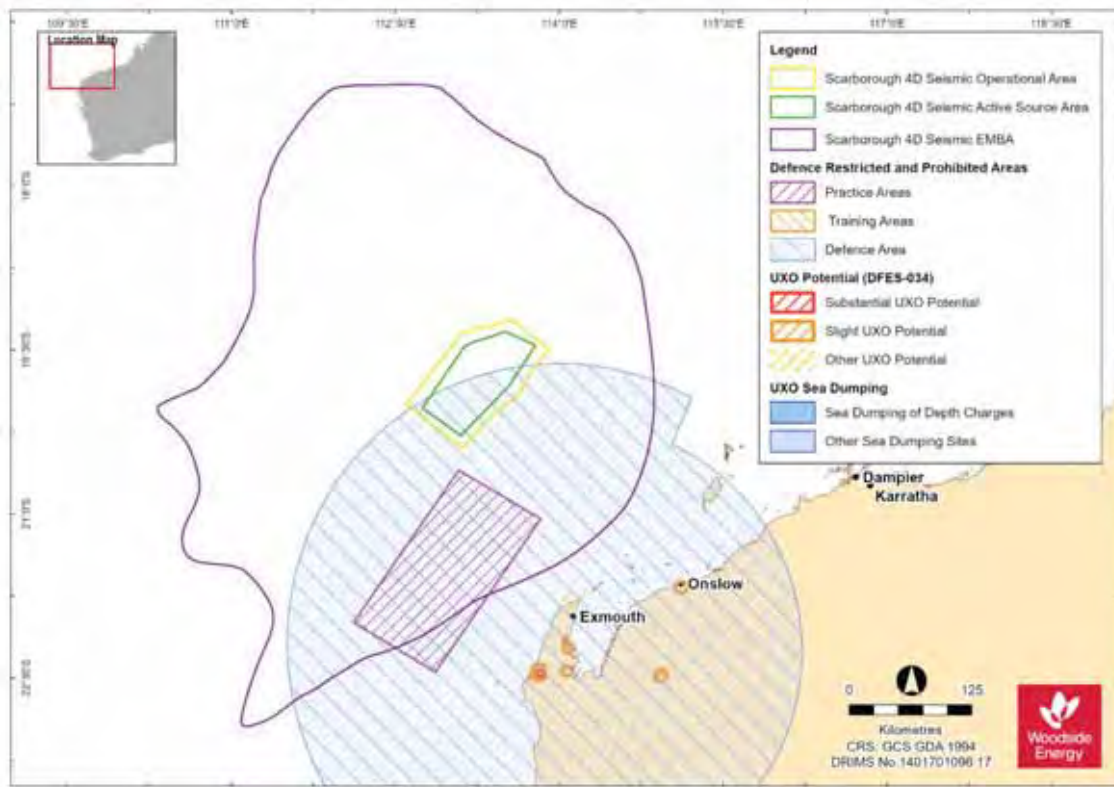
Woodside Feedback

Defence map – Operational Area



Defence map – EMBA

Scarborough 4D B1 Marine Seismic Survey Environment Plan



1.111 Email (17 March 2023)

Deleted

1.112 Email sent to Karratha Community Liaison Group (27 January 2023)

Dear Karratha Community Liaison Group

Woodside has submitted Environment Plans (EPs) to undertake the following activities in Commonwealth waters for the Scarborough development:

- seabed intervention and trunkline installation activities for the section of the Trunkline in Commonwealth waters under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP**);
- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and
- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#).

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **26 February 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in	Drilling and Completions activities in Commonwealth waters,	4D baseline seismic survey over the Scarborough and Jupiter	Seabed site surveys and installation of subsea production

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A separate EP covers activities in State waters.	including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
Estimated duration:	~24 months across multiple campaigns	~50 – 60 days per well	~55 – 70 days	~18 months (cumulative) for the survey and installation activities
Distance from Operational Area to nearest town	The closest Commonwealth section of the trunkline on the State waters boundary is ~32 km north-west of Dampier.	~244 km north-northwest of Exmouth, 374 km west-northwest of Dampier.	~214 km north-west of Exmouth.	~ 244 km north-northwest of Exmouth, ~ 374 km west-northwest of Dampier.

Scarborough 4D B1 Marine Seismic Survey Environment Plan

<p>Distance from Operational Area to nearest marine park</p>	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwlth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
<p>Operational Area and Exclusion Zones</p>	<p>Temporary 500 m exclusion zones will apply around applicable seabed intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>A petroleum safety zone of 500 m will be in place around the MODU and installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> DP MODU/drillship – 500 m radius from each well centre Moored MODU – 4,000 m radius from each well centre. Installation vessel – 1,500 m radius around subsea locations 	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the seismic vessel, streamers and tail buoys during seismic operations Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<p>The Operational Area for activities includes a radius of:</p> <ul style="list-style-type: none"> 1,000 m around location of the outermost concrete pads. 1,500 m around location of subsea infrastructure. 2,000 m around future location of FPU. Temporary 500 m exclusion zone around vessels to manage vessel movements An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
<p>Vessels:</p>	<p>Seabed intervention:</p> <ul style="list-style-type: none"> Trailing suction hopper dredge Offshore construction vessel Rock Installation Vessel Survey vessels Support vessels Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> Pipelay Vessel multi-joint operation Shallow Water Lay Barge 	<ul style="list-style-type: none"> Installation vessels for installing the subsea infrastructure Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> A purpose-built seismic vessel One support vessel A potential chase vessel, and An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> Light construction vessels Heavy construction vessels Heavy lift vessels Derrick lay vessel Reel-lay vessels Survey vessels Support vessels

	<ul style="list-style-type: none"> • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 			
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Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.

Please provide your views by **26 February 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.113 Email sent to Commonwealth Scientific and Industrial Research Organisation (CSIRO) (6 February 2023)

Dear CSIRO Enquiries Team, [REDACTED] and [REDACTED],

Woodside previously noted (see email below) that there will be a number of opportunities to provide feedback on its proposed activities.

Woodside previously consulted you on its submitted Environment Plan (EPs) to undertake seabed intervention and trunkline installation activities under the Scarborough Seabed Intervention and Trunkline Installation EP (**SITI EP** – Commonwealth and State components).

As part of its ongoing consultation with the CSIRO, Woodside is also seeking your advice regarding any research activities that CSIRO may be undertaking that may overlap with our proposed activities regarding:

- drilling and subsea tree installation activities for eight planned development wells and the potential for a further two additional contingency wells under the WA-61-L Scarborough Drilling and Completions EP (**D&C EP**);
- 4D baseline marine seismic survey (MSS) activities over the Scarborough and Jupiter field under the Scarborough 4D Baseline Marine Seismic Survey EP (**Seismic EP**); and

Scarborough 4D B1 Marine Seismic Survey Environment Plan

- seabed site surveys and installation of subsea production infrastructure under the Subsea Infrastructure Installation EP (**Subsea EP**).

Updated consultation Information Sheets are attached, which provide additional background on the proposed activities, including summaries of potential key impacts and risks, and associated management measures. These are also available on our [website](#). Also attached are Commonwealth fishery figures.

As we are inviting consultation with you on each of the EPs above, for ease of reference, we have attached the information in this one email. In an effort to simplify feedback, we have also included a feedback template (Appendix A) which you may wish to use to provide your feedback specific to the proposed EPs.

Woodside has previously submitted Revision 1 of the **SITI EP** to NOPSEMA which has been available on the NOPSEMA website since January 2022 (https://info.nopsema.gov.au/environment_plans/575/show_public). Revision 0 of the **D&C EP** has been available on the NOPSEMA website since November 2021 (https://info.nopsema.gov.au/environment_plans/565/show_public). Revision 0 of the **Seismic EP** has been available on the NOPSEMA website since 18 October 2021 (https://info.nopsema.gov.au/environment_plans/559/show_public).

Woodside is preparing to submit a further revision of the SITI EP, D&C EP and Seismic EP to NOPSEMA with recent changes. We confirm the activities, location and duration described in these revisions remain the same, with no material changes. The Subsea EP has not yet been submitted to NOPSEMA.

The SITI EP, D&C EP and Subsea EP fall under the primary environmental approval of the [Scarborough Offshore Project Proposal](#) (OPP). The OPP includes a detailed description of activities, an assessment of the potential impacts and risks and includes management measures to demonstrate that the potential impacts and risks will be of an acceptable level. It was accepted by NOPSEMA in March 2020 after an extensive public consultation process.

More information on the Scarborough Project can be found [here](#).

If you have additional feedback specific to each of the proposed activities described under the relevant EPs, please respond to Woodside at Feedback@woodside.com.au or 1800 442 977 by **8 March 2023**.

Activity:

	SITI EP	D&C EP	Seismic EP	Subsea EP
Summary:	Seabed intervention and trunkline installation activities in Commonwealth waters associated with the installation of a carbon steel pipeline (Trunkline) that runs approximately 430 km from the from the proposed offshore Scarborough Floating Production Unit (FPU) to the existing onshore Pluto LNG facility. This EP covers activities for the approximately 400 km section of the Trunkline in Commonwealth waters. A	Drilling and Completions activities in Commonwealth waters, including drilling and subsea tree installation activities for eight planned development wells and the potential for a further two contingency wells. Woodside may need to intervene, workover or re-drill the wells. Subsea inspection, monitoring, maintenance and subsea infrastructure repair activities may also be undertaken.	4D baseline seismic survey over the Scarborough and Jupiter fields. The proposed survey will be conducted over areas where seismic data has previously been acquired. The objective for the proposed activity is to acquire a new 3D seismic survey data that will provide the baseline for future 'time lapse' reservoir surveillance (or technically termed 4D baseline survey).	Seabed site surveys and installation of subsea production infrastructure. Activities include visual pre- and post-installation surveys, and installation of flowlines, umbilicals and risers and ancillary infrastructure, required for the flow and control of hydrocarbons and produced water to the Scarborough Floating Production Unit (FPU). Mooring legs and suction piles will also

Scarborough 4D B1 Marine Seismic Survey Environment Plan

	separate EP covers activities in State waters.			be installed and a gravimetry survey is also planned.
Location:	Activities run from the Scarborough FPU in WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, to the State waters boundary at the northern extent of the Dampier Archipelago.	Activities are located in Permit Area WA-61-L in Commonwealth waters, about 374 km west-northwest of Dampier, Western Australia. Approximate development well locations for the eight planned wells are provided in Table 2 of the attached D&C EP Consultation Information Sheet.	The seismic survey will cover the Scarborough and Jupiter fields within Commonwealth waters, located in the Exmouth Plateau, approximately 214 km north west of Exmouth, Western Australia.	Activities are located in permit Areas WA-61-L and WA-62-L, around 374 km west-northwest of Dampier, Western Australia.
Approx. Water Depth (m):	~ 32 m – 1400 m	~ 900 m – 955 m	~ 800 m – 1,150 m	~ 900 m – 1000 m
Earliest commencement date:	Seabed intervention activities: Mid 2023 pending approvals, vessel availability and weather constraints. Trunkline installation activities: Q4 2023 pending successful completion approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H1 2023 pending approvals, vessel availability and weather constraints.	Activities planned to commence in H2 2023 (and estimated to be completed in 18 months with activities occurring in multiple campaigns).
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Distance from Operational Area to nearest marine park	<ul style="list-style-type: none"> The trunkline corridor runs through the Montebello Marine Park – Multiple Use Zone (Cwth), close to the northern boundary Offshore borrow ground located to the north of the Dampier Marine Park Habitat Protection Zone 	<ul style="list-style-type: none"> ~83 km north of the Gascoyne Marine Park (Cwlth) ~206 km north-west of Montebello Marine Park (Cwlth) ~208 km north-northwest of Ningaloo Marine Park (Cwlth) 	<ul style="list-style-type: none"> ~46 km north of Gascoyne Marine Park Multiple Use Zone 	<ul style="list-style-type: none"> ~ 77 km north of the Gascoyne Marine Park (Cwlth) ~ 201 km north-west of Montebello Marine Park (Cwlth) ~ 180 km north-northwest of Ningaloo Marine Park (Cwlth)
Operational Area and	Temporary 500 m exclusion zones will apply around applicable seabed	A petroleum safety zone of 500 m will be in place around the MODU and	<ul style="list-style-type: none"> Three nautical mile radius safe navigation area around the 	The Operational Area for activities includes a radius of:

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Exclusion Zones	<p>intervention and the Trunkline installation vessels. The Operational Areas are:</p> <ul style="list-style-type: none"> • Trunkline Project Area: The proposed trunkline from around KP 32 (Commonwealth – State Boundary) to KP 435 and 1.5 km either side of the proposed trunkline centreline. • Offshore Borrow Ground Project Area: Offshore Borrow Ground located in Commonwealth waters. 	<p>installation vessel for the duration of activities. The Operational Areas are:</p> <ul style="list-style-type: none"> • DP MODU/drillship – 500 m radius from each well centre • Moored MODU – 4,000 m radius from each well centre. • Installation vessel – 1,500 m radius around subsea locations 	<p>seismic vessel, streamers and tail buoys during seismic operations</p> <ul style="list-style-type: none"> • Marine users are requested to avoid this area during the survey to ensure the safety of the seismic vessel and third-party vessels • Refer to Table 3 of the attached Seismic EP Consultation Information Sheet for detailed survey location points 	<ul style="list-style-type: none"> • 1,000 m around location of the outermost concrete pads. • 1,500 m around location of subsea infrastructure. • 2,000 m around future location of FPU. • Temporary 500 m exclusion zone around vessels to manage vessel movements • An interactive map showing the location of the proposed activities will be available on the Woodside website and will be updated throughout the proposed activities
Vessels:	<p>Seabed intervention:</p> <ul style="list-style-type: none"> • Trailing suction hopper dredge • Offshore construction vessel • Rock Installation Vessel • Survey vessels • Support vessels • Fuel bunkering vessels <p>Trunkline installation:</p> <ul style="list-style-type: none"> • Pipelay Vessel multi-joint operation • Shallow Water Lay Barge • Anchor handling vessel/tug • Pipe supply vessels • Offshore construction vessel • Survey vessels • Fuel bunkering vessels 	<ul style="list-style-type: none"> • Installation vessels for installing the subsea infrastructure • Light well intervention vessel as an option for well intervention, subsea hardware installation or contingent activities • Support vessels including installation vessel(s), anchor handling vessel(s) and general supply/support vessels 	<ul style="list-style-type: none"> • A purpose-built seismic vessel • One support vessel • A potential chase vessel, and • An additional spotter vessel (May to June) 	<ul style="list-style-type: none"> • Light construction vessels • Heavy construction vessels • Heavy lift vessels • Derrick lay vessel • Reel-lay vessels • Survey vessels • Support vessels

Feedback:

If you have any issues or concerns with these activities, or any other issues relevant to this location, please respond to Woodside at:

Feedback@woodside.com.au or 1800 442 977.

Your feedback and our response will be included in our Environment Plan which will be submitted to submitted to the National Offshore Petroleum Safety and Environmental Management Authority

Scarborough 4D B1 Marine Seismic Survey Environment Plan

(NOPSEMA) for acceptance in accordance with the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth).

Please let us know if your feedback for any of the activities proposed under an Environment Plan is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan to ensure this information remains confidential to NOPSEMA.
Please provide your views by **8 March 2023**.

Regards,

APPENDIX A

FEEDBACK	SITI EP	D&C EP	Seismic EP	Subsea EP

1.114 Newspaper advertisements (January 2023)

- The Australian, The West Australian, Pilbara News, Midwest Times, North West Times (18 January 2023)
- Geraldton Times (20 January 2023)

The Australian – 18 January 2023

ENVIRONMENT PLANS NOTICE

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Activity summary: The proposed activity is a marine seismic survey for the Scarborough 4D B1 field, located in the Scarborough Basin, approximately 100 km offshore Scarborough, Queensland. The survey will involve the use of a seismic vessel and a towed streamer system to collect seismic data. The survey area is approximately 100 km x 100 km.

Location: Scarborough Basin, Queensland, Australia.

Commencement date: The survey is expected to commence in early 2023.

Estimated duration: The survey is expected to last for approximately 12 months.

Environment summary: The survey area is located in the Scarborough Basin, which is a shallow marine environment. The basin is characterized by a sandy seabed and is home to a variety of marine life, including fish, crustaceans, and mollusks. The survey area is also an important habitat for seabirds and marine mammals.

Environment plan: The environment plan for the survey is designed to minimize the impact of the survey on the marine environment. This includes measures to avoid, minimize, and compensate for any adverse effects. Key measures include:

- Use of a quiet seismic vessel and towed streamer system to reduce noise levels.
- Implementation of a strict no-discharge policy to prevent pollution of the marine environment.
- Establishment of a marine mammal exclusion zone to avoid disturbance to these animals.
- Implementation of a strict no-dredging policy to prevent disturbance to the seabed.
- Implementation of a strict no-fishing policy to avoid disturbance to fish stocks.

Figure 1: Map of the Scarborough Basin showing the survey area.

8 WORLD

Iran raids coffers to help fight protesters

UK says probed after execution

Iran's Revolutionary Guard Corps (IRGC) raided the coffers of a British company to help fund the fight against protesters, according to a report by the UK's intelligence services. The report, obtained by the BBC, says the IRGC targeted the assets of a British company, which had been accused of providing financial support to the protesters. The report also says that the IRGC had seized the assets of the company and used them to fund the fight against the protesters. The UK government has said that it is investigating the report and may take action if it is found to be true.

Italy mourns golden screen goddess

Italy mourns the death of a golden screen goddess, the actress Sophia Loren, who died of cancer on Sunday. Loren, who was 90 years old, was one of the most famous Italian actresses of the 20th century. She was known for her beauty and her roles in classic Italian films. Her death was a significant loss to the Italian film industry.



The Italian film industry mourns the death of a golden screen goddess, the actress Sophia Loren, who died of cancer on Sunday. Loren, who was 90 years old, was one of the most famous Italian actresses of the 20th century. She was known for her beauty and her roles in classic Italian films. Her death was a significant loss to the Italian film industry.



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CLASSIFIED (see page 4)

Funeral Notices

BOWEN
The funeral service for Mrs. Mavis Mavis Bowen will be held at 11.30am on Monday, 16th January 2023 at the Scarborough Community Centre, 100 Scarborough Road, Scarborough. Burial will be in the family grave at the same place.

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ENVIRONMENT PLANS NOTICE

Environment Australia has received an application for an Environmental Management Plan (EMP) for the Scarborough 4D B1 Marine Seismic Survey Environment Plan. The EMP details the proposed activities, the environmental impacts, and the measures to be taken to avoid, minimise, and compensate for those impacts.

The EMP is available for public comment. Comments should be submitted to the Department of Environment, Water and Heritage, PO Box 112, Perth, Western Australia 6001. Comments should be received by 14 February 2023.

Activity Summary:
The proposed activity is the Scarborough 4D B1 Marine Seismic Survey. The activity involves the use of seismic vessels and towed arrays to collect seismic data in the Scarborough region.

Environmental Impact:
The proposed activity may result in noise, vibration, and disturbance (NVD) impacts on the marine environment. The EMP includes measures to avoid, minimise, and compensate for these impacts.

Environmental Management Plan (EMP):
The EMP includes measures to avoid, minimise, and compensate for the impacts of the proposed activity. The EMP also includes monitoring and reporting requirements.

Public Comment:
The EMP is available for public comment. Comments should be submitted to the Department of Environment, Water and Heritage, PO Box 112, Perth, Western Australia 6001. Comments should be received by 14 February 2023.

Figure 1: Geographic location of the Scarborough 4D B1 Marine Seismic Survey Environment Plan.

The map shows the Scarborough region in Western Australia, with the proposed activity area highlighted. The map includes the coastline, major roads, and the location of the Scarborough Community Centre.

Environment Australia
Department of Environment, Water and Heritage
PO Box 112, Perth, Western Australia 6001
Tel: (08) 9477 2000
www.environment.wa.gov.au

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ENVIRONMENT PLANS NOTICE

Scarborough 4D B1 Marine Seismic Survey Environment Plan

Activity Summary: The purpose of the Environment Plan is to ensure that the proposed activities are conducted in a manner that is consistent with the requirements of the Environmental Protection Act 1986 and the Environmental Protection Regulations 1986.

Location: Scarborough 4D B1 Marine Seismic Survey Area.

Commencement Date: 1 February 2023.

Expiry Date: 31 December 2023.

Responsible Officer: Ian Liddle, Chief Executive Officer.

Environment Plan Summary: The Environment Plan sets out the measures that will be taken to manage the environmental risks associated with the proposed activities. It includes measures to manage the risks of noise, vibration, and air quality, as well as measures to manage the risks of marine mammals and seabirds.

Environment Plan Details: The Environment Plan is available in both English and French. It can be accessed on the Shire of Exmouth website at www.exmouth.wa.gov.au.

Environment Plan Contact: For more information, please contact the Environment Plan Officer at environment@exmouth.wa.gov.au.

PUBLIC NOTICES

SHIRE OF EXMOUTH

RFQ 03/2023 Supply of Solid Waste Management Services (2023 Total Solar Eclipse)

The Shire of Exmouth is seeking a suitably qualified and experienced contractor to provide the supply of the proposed products to West Street Cemetery during the Total Solar Eclipse Event.

A copy of the RFQ documentation is available from TenderLink. The price schedule of documentation is available. Submissions must be lodged via TenderLink Portal - point-to-point communication.

Compliance of Council will be used. Submissions must be lodged via TenderLink Portal by 2:00pm on **Wednesday 1st February 2023**.

Ben Lewis
CHIEF EXECUTIVE OFFICER

Proposed Local Laws

Local Law 2023/001
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/002
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/003
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/004
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/005
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

SHIRE OF EXMOUTH

REQUEST FOR QUOTE RFQ 03-2024 Supply of Firefighting Equipment (2023 Total Solar Eclipse)

The Shire of Exmouth is seeking a suitably qualified and experienced contractor to provide the supply of the proposed products to West Street Cemetery during the Total Solar Eclipse Event.

A copy of the RFQ documentation is available from TenderLink. The price schedule of documentation is available. Submissions must be lodged via TenderLink Portal - point-to-point communication.

Compliance of Council will be used. Submissions must be lodged via TenderLink Portal by 2:00pm on **Monday 20th January 2023**.

Ben Lewis
CHIEF EXECUTIVE OFFICER

Proposed Local Laws

Local Law 2023/006
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/007
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/008
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/009
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

Local Law 2023/010
The purpose of the proposed local law is to amend the number of seats on the Council of the Shire of Exmouth from 12 to 10. The proposed local law also provides for the appointment of a deputy mayor and the appointment of a deputy mayor pro tem.

SHIRE OF EXMOUTH

NOTICE OF ANNUAL GENERAL MEETING OF ELECTORS

It is announced that on 29th of the Local Government Act 1995, the Shire of Exmouth hereby gives notice of a General Meeting of Electors.

The meeting will be held on **Thursday 2 February 2023 at 9:00 am** in the **Mandj Mandj Theatre Centre, Mandj Mandj Centre, 21 West Street, Exmouth.**

The purpose of the meeting is to:

1. Confirm the minutes of the previous General Meeting of Electors meeting held on 2 February 2022;
2. Review of the 2021/2022 Annual Report; and
3. General Business.

Ballots of Electors will be provided for submission to the Chief Executive Officer, questions relating to the general meeting no later than **Wednesday, 1 February 2023** to enable adequate time to be provided at the meeting.

The Shire of Exmouth 2022/2023 Annual Report is available for viewing at the Shire Subscriptions Office, the Exmouth Library and on the Shire's website www.exmouth.wa.gov.au.

Ben Lewis
CHIEF EXECUTIVE OFFICER

EMPLOYMENT

Clinical Nurse Manager
Clinical Nurse Manager
Warrnambool
Warrnambool
Warrnambool
Warrnambool
Warrnambool

Government of Western Australia

Clinical Nurse Manager

Clinical Nurse Manager
Warrnambool
Warrnambool
Warrnambool
Warrnambool
Warrnambool

The Department of Health is seeking applications for a Clinical Nurse Manager position in Warrnambool. The successful applicant will be responsible for the management of the Clinical Nurse Manager team in Warrnambool. The successful applicant will be responsible for the management of the Clinical Nurse Manager team in Warrnambool.

For further information, please contact the Human Resources Manager at hr@health.wa.gov.au.

Closing Date: Friday 27th January 2023

Midwest Time – 18 January 2023

24 MIDWEST TIMES

midwesttimes.com.au

WEDNESDAY, JANUARY 18, 2023

ENVIRONMENT PLANS NOTICE

Midwest Times, Scarborough, Friday, 18 January 2023. This notice is published in accordance with the Environment Act 2022 (the Act) and the Environment Regulations 2022 (the Regulations).

Scarborough 4D Seismic Marine Seismic Survey Environment Plan

Activity summary	Seismic surveying for the Scarborough 4D Seismic Survey in the Scarborough 4D Seismic Survey Area.
Location	Offshore of Scarborough, South Australia.
Commencement timing	12:00 hours on 18 January 2023.
Estimated duration	12:00 hours on 18 January 2023.
Consultation commenced	18 January 2023. For all information visit: www.sa.gov.au

Scarborough Shoring & Completion Environment Plan

Activity summary	Shoring and completion of the Scarborough 4D Seismic Survey in the Scarborough 4D Seismic Survey Area.
Location	Offshore of Scarborough, South Australia.
Commencement timing	12:00 hours on 18 January 2023.
Estimated duration	12:00 hours on 18 January 2023.
Consultation commenced	18 January 2023. For all information visit: www.sa.gov.au

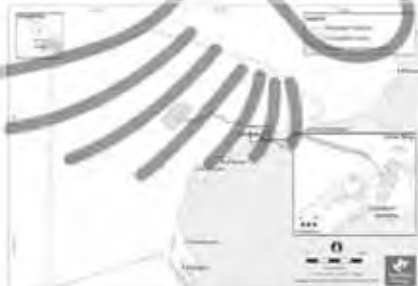
Scarborough Seismic Survey Area and Seismic Survey Area Environment Plan

Activity summary	Seismic surveying for the Scarborough 4D Seismic Survey in the Scarborough 4D Seismic Survey Area.
Location	Offshore of Scarborough, South Australia.
Commencement timing	12:00 hours on 18 January 2023.
Estimated duration	12:00 hours on 18 January 2023.
Consultation commenced	18 January 2023. For all information visit: www.sa.gov.au

Scarborough Seismic Survey Area Environment Plan

Activity summary	Seismic surveying for the Scarborough 4D Seismic Survey in the Scarborough 4D Seismic Survey Area.
Location	Offshore of Scarborough, South Australia.
Commencement timing	12:00 hours on 18 January 2023.
Estimated duration	12:00 hours on 18 January 2023.
Consultation commenced	18 January 2023. For all information visit: www.sa.gov.au

Figure 1. Summary of the activities and their locations in the Scarborough 4D Seismic Survey Area. The map shows the location of the Scarborough 4D Seismic Survey Area and the Scarborough 4D Seismic Survey Area. The map also shows the location of the Scarborough 4D Seismic Survey Area and the Scarborough 4D Seismic Survey Area.



Consultation participation and feedback

For more information on the Scarborough 4D Seismic Survey Environment Plan, visit the project page on the Environment Act 2022 website. You can also contact the project manager for more information.

Feedback

You can provide feedback on the Scarborough 4D Seismic Survey Environment Plan by visiting the project page on the Environment Act 2022 website. You can also contact the project manager for more information.

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North West Times – 18 January 2023

Page 90 – North West Telegraph January 18, 2023

northwesttelegraph.com.au

ENVIRONMENT PLANS NOTICE

Environment Australia (EPA) is currently reviewing the Environmental Management Plans (EMPs) for the Scarborough 4D B1 Marine Seismic Survey (SSS) and the Scarborough 4D B1 Marine Seismic Survey (SSS) and the Scarborough 4D B1 Marine Seismic Survey (SSS).

Scarborough 4D B1 Marine Seismic Survey (SSS) Environmental Plan

Activity summary	Conducting marine seismic surveys in the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Location	Offshore of the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Commenced/ending	2022/2023 (ongoing) until the end of the survey period.
Extended deadline	2023/2024 (ongoing) until the end of the survey period.
Consultation commenced	18/01/2023 View EA assessment for EMP10000 Download PDF

Scarborough 4D B1 Marine Seismic Survey (SSS) Environmental Plan

Activity summary	Conducting marine seismic surveys in the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Location	Offshore of the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Commenced/ending	2022/2023 (ongoing) until the end of the survey period.
Extended deadline	2023/2024 (ongoing) until the end of the survey period.
Consultation commenced	18/01/2023 View EA assessment for EMP10000 Download PDF

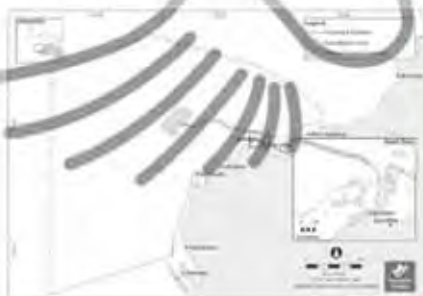
Scarborough 4D B1 Marine Seismic Survey (SSS) Environmental Plan

Activity summary	Conducting marine seismic surveys in the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Location	Offshore of the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Commenced/ending	2022/2023 (ongoing) until the end of the survey period.
Extended deadline	2023/2024 (ongoing) until the end of the survey period.
Consultation commenced	18/01/2023 View EA assessment for EMP10000 Download PDF

Scarborough 4D B1 Marine Seismic Survey (SSS) Environmental Plan

Activity summary	Conducting marine seismic surveys in the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Location	Offshore of the Scarborough 4D B1 Marine Seismic Survey (SSS) area.
Commenced/ending	2022/2023 (ongoing) until the end of the survey period.
Extended deadline	2023/2024 (ongoing) until the end of the survey period.
Consultation commenced	18/01/2023 View EA assessment for EMP10000 Download PDF

Figure 1: Location of the Scarborough 4D B1 Marine Seismic Survey (SSS) area. The map shows the survey area in the North West region of Western Australia, with the Scarborough 4D B1 Marine Seismic Survey (SSS) area highlighted in red. The map also shows the location of the Scarborough 4D B1 Marine Seismic Survey (SSS) area relative to the Scarborough 4D B1 Marine Seismic Survey (SSS) area.



Consultation Participation and Feedback
The public is invited to provide feedback on the Environmental Management Plans (EMPs) for the Scarborough 4D B1 Marine Seismic Survey (SSS) and the Scarborough 4D B1 Marine Seismic Survey (SSS) and the Scarborough 4D B1 Marine Seismic Survey (SSS). Feedback can be provided via the following methods:
• Email: scs@environment.gov.au
• Phone: 1300 737 737
• Website: www.environment.gov.au/scs
• Facebook: www.facebook.com/scs
• Twitter: [www.twitter.com/scs](https://twitter.com/scs)
• LinkedIn: www.linkedin.com/company/scs
• YouTube: www.youtube.com/channel/UCscs
• Instagram: www.instagram.com/scs
• TikTok: www.tiktok.com/@scs
• Other: Any other method of communication that you prefer.

PUBLIC NOTICES

Hudson's Bay Club
Saturday 18th Jan
10:00am at the Club House

We can help create a fitting tribute to celebrate the life of a loved one. Please phone Classified.

Advertise your WEEKLY SPECIALS

Reach a LOCAL audience with a newspaper ad

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Geraldton Guardian – 20 January 2023

30 GERALDTON GUARDIAN

geraldtonguardian.com.au

FRIDAY, JANUARY 20, 2023

ENVIRONMENT PLANS NOTICE

Notice under the Environmental Protection Act 1986 and the Environmental Protection Regulations 2001, in relation to the proposed Scarborough 4D B1 Marine Seismic Survey Environment Plan.

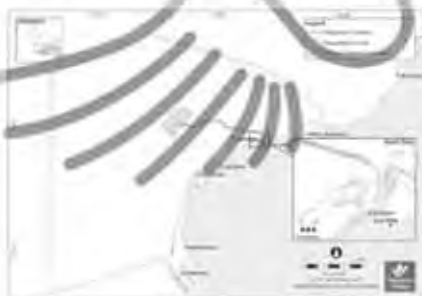
Table with 2 columns: Activity Summary, Location, Environmental Impact, Estimated Duration, Consultation Commenced. Row 1: Scarborough 4D B1 Marine Seismic Survey Environment Plan.

Table with 2 columns: Activity Summary, Location, Environmental Impact, Estimated Duration, Consultation Commenced. Row 1: Scarborough 4D B1 Marine Seismic Survey Environment Plan.

Table with 2 columns: Activity Summary, Location, Environmental Impact, Estimated Duration, Consultation Commenced. Row 1: Scarborough 4D B1 Marine Seismic Survey Environment Plan.

Table with 2 columns: Activity Summary, Location, Environmental Impact, Estimated Duration, Consultation Commenced. Row 1: Scarborough 4D B1 Marine Seismic Survey Environment Plan.

Figure 1: Overview map of the Scarborough 4D B1 Marine Seismic Survey Environment Plan area. The map shows the survey track along the coast of Scarborough, with various environmental features and infrastructure marked.



Consultation Feedback and Feedback: This section provides information on how to provide feedback on the proposed Environment Plan. It includes contact details for the Environmental Protection Authority (EPA) and the Department of Environment and Conservation (DEC).

EMPLOYMENT: George Glatzer Law Chambers are seeking a person for a reception/administrative role to be located in portugal matters. This role will involve a variety of legal and administrative work. Flexibility is available for some working from home and school hours. Please send cover letter and resume to: rosemarie@georgeglatzer.com.au

Employment: The City of Geraldton is seeking a person for a position in the City of Geraldton. The position is located in the City of Geraldton and involves a variety of administrative and clerical duties. The position is open to all qualified persons. For more information, please contact the City of Geraldton at: (08) 9422 1111.

Health and Beauty: ASIAN MASSAGE: Enjoy a relaxing body massage with the best service. Hours Sun - 9pm. Ph: 0415 280 522. ADULT SERVICES: GERALDTON MASSAGE: Relaxation, Massage, Ph: 0800 123 456.

Share it with Classifieds: Get your car SOLD with a mix of Print & Online ads. Please phone Classifieds.

Show off your results HERE! Share it with a Classifieds ad. Image of a basketball player.

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Announce here! with Classifieds

1.115 Email sent to Tuna Australia (17 May 2023)

Dear [REDACTED],

Thank you for providing Tuna Australia's industry position statement.

As previously advised, the level of feedback provided by an organisation, if any, is at the person or organisation's discretion. Woodside does not have an expectation that organisations will provide a report or engage a consultant to engage in consultation or provide feedback on their behalf. That is not the purpose of the notification or consultation.

We are open to suggestions from Tuna Australia as to ways to improve efficiency and simplicity for feedback so that the process is manageable.

Woodside reiterates it would be happy to meet with Tuna Australia to provide an overview of our proposed activities, how we develop our environment plans and the extensive controls we have in place to reduce impacts to as low as reasonably practical (ALARP) and acceptable level. The aim is to provide an efficient and simple way to obtain feedback and to assist in an understanding of Woodside's activities, such that Tuna Australia's input can be considered in the development of environment plans.

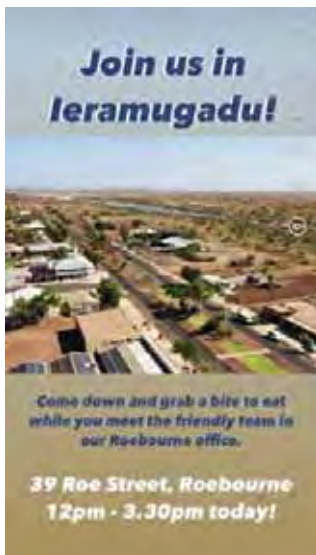
As per Woodside's ongoing consultation approach, feedback continues to be assessed and responded to, as required, through the life of an EP.

Regards,

1.116 Community Information Session advertisements, social media and poster**Social Media - Facebook Stories**

Facebook stories on Friday 5/5 seen by 772 people (attachment #2 & #3) and another Facebook story on Wednesday 10/5 seen by 1,400 people (attachment #4 & #5).

#2 & #3



#4 & #5



Woodside North West
Posted by Sprinklr
5 d · 🌐

You're invited to meet, greet and eat with our friendly team at our Roebourne office! 🍷

We're welcoming traditional custodians and all community members to join us and ask any questions you may have about our operations or proposed projects.


Visit us today at 39 Roe Street, Roebourne between 12pm and 3.30pm.



[See Insights and Ads](#) [Boost post](#)

👍 8 2 comments

Post insights



Friday, 12:45pm · 🌐

👍 1.1K 🗨️ 8 💬 2 ➦ 0

Overview ⓘ

Reach	1,085
Impressions	1,096
Post reactions, comments and shares	10
Total clicks	43

Post reactions, comments and shares ⓘ

👍	👎	😂	😮	😞	😡
8	0	0	0	0	0

Reactions: 8
Comments: 2

23/5/2

Reeboorne District High School
2.1k



COMMUNITY BBQ SESSIONS

JOIN US IN IERAMUGADU

You're invited to meet, greet and eat with our friendly team at Woodside's Reeboorne office.

We're welcoming traditional custodians and all community members to join us and ask any questions you may have about our operations and proposed projects.

Stop by 39 Roe Street, Reeboorne, between 12pm and 3.30pm, on:

Friday	Wednesday	Friday	Wednesday
5 May 2023	10 May 2023	19 May 2023	24 May 2023

 Woodside Energy

1 share

Posters



COMMUNITY BBQ SESSIONS

JOIN US IN IERAMUGADU

You're invited to meet, greet and eat with our friendly team at Woodside's Roebourne office.

We're welcoming traditional custodians and all community members to join us and ask any questions you may have about our operations and proposed projects.

Stop by 39 Roe Street, Roebourne, between **12pm** and **3.30pm**, on:

Friday	Wednesday	Friday	Wednesday
5 May 2023	10 May 2023	19 May 2023	24 May 2023



Email sent out via Roebourne Community Calendar – 29 April 2023**1.117 Geotargeted social media campaign**

A Facebook information campaign was targeted along the coastline from Geraldton to Derby to ensure it reached all communities adjacent to the EMBA. Geotargeting locations are distributed along the coast, with 80 km radiuses around towns, cities and shires. Geotargeting points were also included for spaces between towns, cities and shires to ensure no areas were missed – you'll see below there are latitude and longitude references for those locations.

As at 9:00am Monday, 29 May 2023

Ad reach: 21,494 users

Impressions: 139,972 views

Clicks through to *Consultation Information* page: 619 link clicks

Geotargeting locations:

- Broome (+80 km)
- Carnarvon (+80 km)
- Denham (+80 km)
- Exmouth (+80 km)
- Geraldton (+80 km)
- Onslow (+80 km)
- Port Hedland (+80 km)
- Karratha (+80 km)
- Latitude -17 Longitude 122.65 Dampier Peninsula (+80 km)
- Latitude -22.75 Longitude 114.10 Exmouth Gulf (+80 km)
- Latitude -18.96 Longitude 121.94 Gingerah (+80 km)
- Latitude -27.85 Longitude 114.25 Kalbarri National Park (+80 km)
- Latitude -21.32 Longitude 116.03 Mardie (+80 km)
- Pardoo (+80 km)
- Latitude -20.94 Longitude 117.83 Sherlock (+80 km)
- Latitude -26.96 Longitude 113.95 Tamala (+80 km)
- Latitude -19.88 Longitude 121.15 Telfer (+80 km)
- Latitude -17.52 Longitude 123.56 Willare (+80 km)
- Latitude -22.43 Longitude 114.93 Yannarie (+80 km)



Woodside Energy
Sponsored

Would you like to know what Woodside has planned on land and sea?

We'd like to talk with you.

To find out about our current and proposed work and to share your views with Woodside on your relevant location, activities or interests visit: woodside.com/consultation-activities.

Alternatively, you can contact us at Feedback@woodside.com.au or on 1800 442 977.

woodside.com
Woodside's consultation activities [Learn more](#)



Woodside Energy
Sponsored

Would you like to know what Woodside has planned on land and sea?

We'd like to talk with you.

To find out about our current and proposed work and to share your views with Woodside on your relevant location, activities or interests visit: woodside.com/consultation-activities.

Alternatively, you can contact us at Feedback@woodside.com.au or on 1800 442 977.

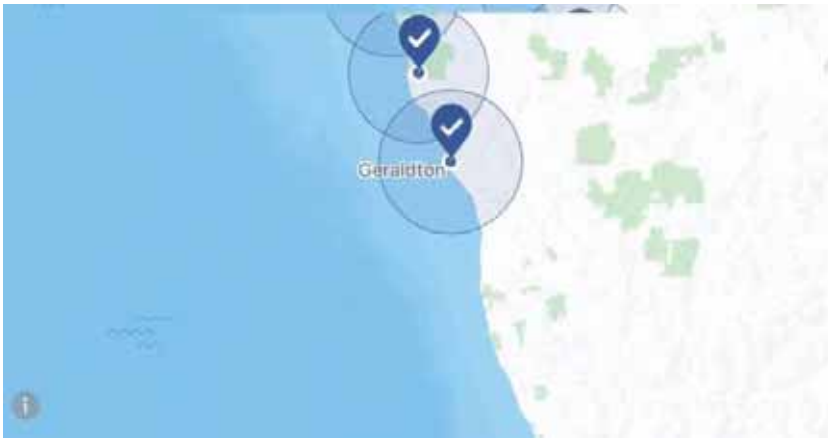
[Learn more](#)



Scarborough 4D B1 Marine Seismic Survey Environment Plan



Scarborough 4D B1 Marine Seismic Survey Environment Plan



Appendix G JASCO ACOUSTIC MODELLING REPORT

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Revision: 7

Woodside ID: 1401760303

Page 406 of 408

Uncontrolled when printed. Refer to electronic version for most up to date information.



Scarborough 4D Marine Seismic Survey

Acoustic Modelling for Assessing Marine Fauna Sound Exposures and Pygmy Blue Whale Exposure Analysis

Submitted to:



Woodside Energy Limited



Authors:

Matthew W. Koessler
Michelle J. Weirathmueller
Dana A. Cusano
Karlee E. Zammit
Craig R. McPherson

28 May 2021

P001476-002
Document 02362
Version 1.0

JASCO Applied Sciences (Australia) Pty Ltd
Unit 1, 14 Hook Street
Capalaba, Queensland, 4157
Tel: +61 7 3823 2620
www.jasco.com



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Disclaimer:

The results presented herein are relevant within the specific context described in this report. They could be misinterpreted if not considered in the light of all the information contained in this report. Accordingly, if information from this report is used in documents released to the public or to regulatory bodies, such documents must clearly cite the original report, which shall be made readily available to the recipients in integral and unedited form.

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Executive Summary

JASCO Applied Sciences performed a numerical estimation study of underwater sound levels associated with the planned Woodside Scarborough 4D Marine Seismic Survey (MSS). Acoustic modelling was conducted for this survey to determine ranges to acoustic exposure thresholds representing the best available science for potential injury and behavioural disruption of marine fauna. Additionally, an acoustic exposure analysis using animal movement modelling was conducted for pygmy blue whales within the pygmy blue whale migration Biologically Important Area (BIA) to investigate any potential effects on pygmy blue whale migration from acquisition of the Scarborough 4D survey.

A specialised airgun array source model was used to predict and compare the acoustic signature of the seismic source and complementary underwater acoustic propagation models were used in conjunction with the modelled array signature to estimate sound levels over a large area around the source. Single-impulse sound fields were predicted at two sites within the survey area. The water depths at the modelled sites ranged between 924 and 1101 m. A conservative sound speed profile that would be most supportive of sound propagation for the period of the survey was defined and applied to all modelling.

The modelling methodology considered source directivity and range-dependent environmental properties in each of the two assessed locations. Estimated underwater acoustic levels are presented as sound pressure levels (SPL, L_p), zero-to-peak pressure levels (PK, L_{pk}), peak-to-peak pressure levels (PK—PK, L_{pk-pk}), particle acceleration (peak magnitude), and either single-impulse (i.e., per-pulse) or accumulated sound exposure levels (SEL, L_E) as appropriate for different noise effect criteria. Accumulated sound exposure fields were predicted for a representative scenario for likely survey operations within the survey area over 24 hours.

The sound footprints are highly directional, and while the maximum distances to criteria are presented in the summary, these distances may not be relevant to receptors or areas of interest in a specific direction. The orientation of the source had the greatest effect on distances to criteria because the array has a pronounced directivity pattern, with greater distances to sound levels in the broadside direction (perpendicular to the tow direction) as compared to the endfire direction (along the tow direction).

SEL_{24h} is a cumulative metric that reflects the dosimetric effect of noise levels within 24 hours, based on the assumption that an receiver (e.g. an animal) is consistently exposed to such noise levels at a fixed position. Where the corresponding SEL_{24h} radii are larger than those for peak pressure criteria, they often represent an unlikely worst-case scenario. More realistically, marine mammals, fish, and sea turtles would not stay in the same location for 24 hours (especially in the absence of location-specific habitat) but rather a shorter period, depending on the animal's behaviour and the source's proximity and movements. Therefore, a reported radius for SEL_{24h} criteria does not mean that marine fauna travelling within this radius of the source will be impaired, but rather that an animal could be exposed to the sound level associated with impairment (either permanent threshold shift (PTS) or temporary threshold shift (TTS)) if it remained at that location for 24 hours.

The analysis considered the distances away from the seismic source at which several effects criteria or relevant sound levels were reached. The results are summarised below for the representative single-impulse sites and accumulated SEL scenarios.

Marine mammals

Table 1. Maximum (R_{max}) horizontal distances (in km) from modelled sites or scenarios to behavioural response threshold, PTS and TTS thresholds for marine mammals.

Hearing group	Modelled distance to effect threshold (R_{max})		
	Behavioural response ¹	Impairment: TTS ²	Impairment: PTS ²
LF cetaceans	7.28	60.7	0.38
MF cetaceans		–	–
HF cetaceans		0.39	0.19

¹ Noise exposure criteria: NOAA (2019)

² Noise exposure criteria: NMFS (2018)

A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

Sea turtles

Table 2. Maximum (R_{max}) horizontal distances (in km) from modelled sites or scenarios to behavioural response thresholds and PTS and TTS thresholds for sea.

Hearing group	Modelled distance to effect threshold (R_{max})			
	Behavioural response ^a	Behavioural disturbance ^b	Impairment: TTS ^c	Impairment: PTS ^c
Turtles	3.87	0.76	0.28	0.05

^a Noise exposure criteria: NSF (2011)

^b Noise exposure criteria: McCauley et al. (2000a)

^c Noise exposure criteria: Finneran et al. (2017)

Fish, fish eggs, fish larvae and plankton

- Fish: This modelling study assessed the radial distances for quantitative criteria based on Popper et al. (2014) and considered both PK and SEL_{24h} (maximum over water column) metrics associated with mortality and potential mortal injury as well as impairment in the following groups:
 - Fish without a swim bladder (also appropriate for sharks in the absence of other information)
 - Fish with a swim bladder that do not use it for hearing
 - Fish that use their swim bladders for hearing
 - Fish eggs, fish larvae and plankton

Table 3. Summary of maximum fish, fish eggs, and larvae injury and TTS onset distances for single impulse and SEL_{24h} modelled scenario.

Relevant hearing group	Effect criteria	Metric associated with longest distance to threshold	R_{max} (km)
Fish: No swim bladder	Injury	PK	0.06
	TTS	SEL _{24h}	4.5
Fish: Swim bladder not involved in hearing and Swim bladder involved in hearing	Injury	PK	0.11
	TTS	SEL _{24h}	4.5
Fish eggs, fish larvae and plankton	Injury	PK	0.11

Animal movement modelling

Animal movement modelling ('animat modelling') focussed on migrating pygmy blue whales in the migration BIA. In this case, the moving receivers (the animats) were set to simulate the real-world movements of migrating pygmy blue whales within the migration BIA. The scenario was modelled for a 7 day period. On each day, a 24 hour segment of the planned seismic track lines was run. Using the distribution of distances of animats predicted to be exposed to sound levels above threshold, the 95th percentile exposure range (ER_{95%}) was computed. The ER_{max} was also included to provide context given the sensitivity of pygmy blue whales and the limited knowledge about their behaviour within the migration BIA. Noise effect metrics included peak pressure level (PK), sound exposure levels (SEL_{24h}), and sound pressure level (SPL).

The results of the animal movement modelling predicted that no pygmy blue whales within the migration BIA would be exposed above any of the assessed threshold criteria. This outcome was driven by two primary influences. First, the closest point of approach (CPA) between the planned seismic survey lines and the BIA was 29.9 km, and second, the migrating pygmy blue whales were traveling through the area and were not present for durations which caused cumulative SEL exposures to exceed either PTS or TTS threshold criteria. These results were different than the distances predicted by the acoustic modelling, which were inherently more conservative because they did not incorporate the complex interactions of both a moving sound field and moving receivers, but rather assumed a static receiver.

Table 4. Summary of animat simulation results for migrating pygmy blue whales indicating maximum (R_{max}) horizontal distances (in km) from modelled sites or scenarios to behavioural response threshold, PTS and TTS thresholds.

Modelled distance to effect threshold (R_{max})		
Behavioural response ¹	Impairment: TTS ²	Impairment: PTS ²
-	-	-

¹ Noise exposure criteria: NOAA (2019)

² Noise exposure criteria: NMFS (2018)

A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

1. Introduction

JASCO Applied Sciences (JASCO), performed a numerical estimation study of underwater sound levels associated with the planned Woodside Scarborough 4D Marine Seismic Survey (MSS) to assist in understanding the potential acoustic effects on receptors including marine mammals, fish, plankton and sea turtles.

JASCO's specialised Airgun Array Source Model (AASM) was used to predict acoustic signatures and spectra for a 3150 in³ airgun array. AASM accounts for individual airgun volumes, airgun bubble interactions, and array geometry to yield accurate source predictions.

Complementary underwater acoustic propagation models were used in conjunction with the modelled array signature to estimate sound levels considering environmental effects. Single-impulse sound fields were predicted at two locations within the potential survey area, and an accumulated sound exposure field scenario was modelled for a representative acquisition pattern for survey operations over 24 h (Section 2). A sound speed profile that would be most supportive of sound propagation conditions for the potential survey periods was defined and applied throughout.

The modelling methodology considered source directivity and range-dependent environmental properties. Estimated underwater acoustic levels are presented as sound pressure levels (SPL, L_p), zero-to-peak pressure levels (PK, L_{pk}), peak-to-peak pressure levels (PK-PK; L_{pk-pk}), and either single-impulse (i.e., per-pulse) or accumulated sound exposure levels (SEL, L_E) as appropriate for different, species specific noise effect criteria. The resulting sound fields were used to estimate radial distance to exposure during operations of this survey in relation to permanent threshold shift (PTS), temporary threshold shift (TTS), and behavioural effect for marine mammals, fish, sea turtles, and plankton.

The acoustic modelling results were also used in conjunction with animal movement modelling simulations to predict the distance at which pygmy blue whales (*Balaenoptera musculus brevicauda*) are expected to be exposed above threshold criteria for PTS, TTS, and behavioural response. Sound exposure distribution estimates are determined by moving large numbers of simulated animals (animats) through a modelled time-evolving sound field, computed using specialised sound source and sound propagation models. This approach provides the most realistic prediction of the maximum expected SPL, PK, and SEL that are now considered the most relevant sound metrics for effect assessment.

Section 3 explains the metrics used to represent underwater acoustic fields and the effect criteria considered. Section 4 details the methodology for predicting the source levels and modelling the sound propagation, including the specifications of the seismic source and all environmental parameters the propagation models require. Section 4 also details the methodology for animat modelling of pygmy blue whales. Section 5 presents the results, which are then discussed and summarised in Section 6.

2. Modelling Scenarios

Two standalone, single-impulse sites were modelled and were used to model one accumulated SEL scenario. The locations of both modelled sites are provided in Table 5. Both sites and the acquisition lines are shown in Figure 1, along with the survey boundaries. The accumulated SEL scenario assumed that a survey vessel sailed along survey lines at ~4.5 knots, with an impulse interval of 12.5 m.

The single impulse sites and the accumulated SEL scenario were selected based on the proposed survey line plan where the survey will be acquired along survey lines orientated at approximately 40/220°. The locations of the single impulse sites were selected considering the entire line along with the seismic source where it would be operational at full-power, including run-out sections of lines. The selected locations are considered representative of the range of water depths that will be covered during the Scarborough 4D MSS and the potential sound propagation characteristics that may arise during survey acquisition.

The scenario accounted for 13722 impulses during the respective 24 h period of acquisition. During line turns, the seismic source was not operating.

The acoustic exposure analysis and animal movement (animat) scenario was modelled for a 7 day period with the same vessel speed and impulse interval as the accumulated SEL scenario discussed above. Figure 2 shows the geographic features associated with the modelled animat scenario.

Table 5. Location details for the single-impulse modelled sites.

Site	Location		MGA (GDA94), Zone 50		Water depth (m)	Tow direction (°)
	Latitude (S)	Longitude (E)	X (m)	Y (m)		
1	19° 33' 25.045"	113° 39' 54.557"	150038	7834133	1101	40 and 220
2	19° 49' 41.340"	113° 21' 55.896"	119206	7803435	925	40 and 220

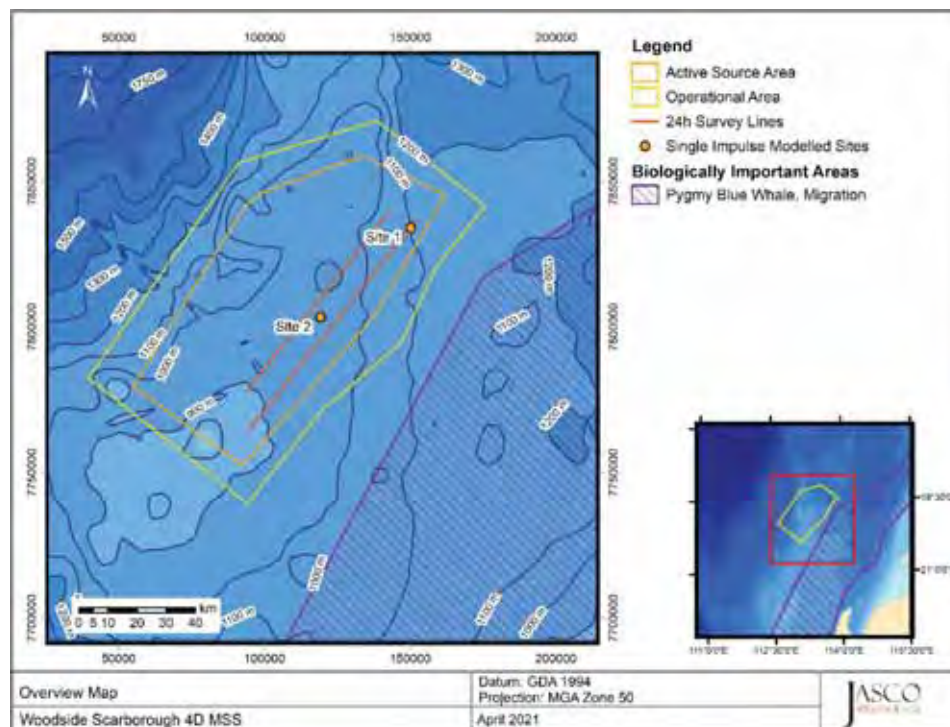


Figure 1. Overview of the modelled sites, acquisition lines, and features for the Scarborough 4D MSS.

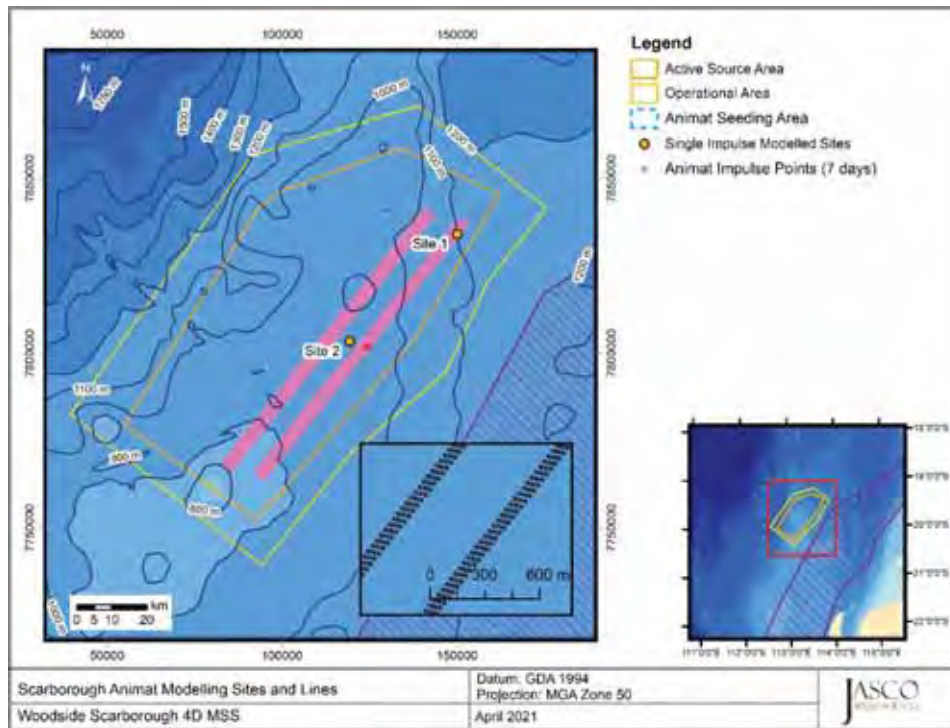


Figure 2. Overview of the features for the pygmy blue whale exposure modelling for the Scarborough 4D MSS.

3. Noise Effect Criteria

The perceived loudness of sound, especially impulsive noise such as from seismic airguns, is not generally proportional to the instantaneous acoustic pressure. Rather, perceived loudness depends on the pulse rise-time and duration, and the frequency content. Several sound level metrics, such as PK, SPL, and SEL, are commonly used to evaluate noise and its effects on marine life (Section 3). The period of accumulation associated with SEL is defined in this report over either a “per pulse” interval or over 24 h. Appropriate subscripts indicate any applied frequency weighting; unweighted SEL is defined as required. The acoustic metrics in this report reflect the updated ISO standard for acoustic terminology, ISO/DIS 18405:2017 (2017).

Whether acoustic exposure levels might injure or disturb marine mammals is an active research topic. Since 2007, several expert groups have developed SEL-based assessment approaches for evaluating auditory injury, with key works including Southall et al. (2007), Finneran and Jenkins (2012), Popper et al. (2014), and United States National Marine Fisheries Service (NMFS 2018). The number of studies that have investigated the level of behavioural disturbance to marine fauna by anthropogenic sound has also increased substantially.

The noise criteria and guidelines considered for this study were chosen because they include standard thresholds, and thresholds or guidelines suggested by the best available science (Sections 3.1–3.3 and Appendices A.3 and A.5):

1. Peak pressure levels (PK; L_{pk}) and frequency-weighted accumulated sound exposure levels (SEL; $L_{E,24h}$) from the US National Oceanic and Atmospheric Administration (NOAA) Technical Guidance (NMFS 2018) for the onset of Permanent Threshold Shift (PTS) in marine mammals.
2. Marine mammal behavioural threshold based on the current US National Oceanic and Atmospheric Administration (NOAA 2019) criterion for marine mammals of 160 dB re 1 μ Pa (SPL; L_p) for impulsive sound sources.
3. Sound exposure guidelines for fish, fish eggs and larvae (including plankton) (Popper et al. 2014).
4. Peak pressure levels (PK; L_{pk}) and frequency-weighted accumulated sound exposure levels (SEL; $L_{E,24h}$) from Finneran et al. (2017) for the onset of permanent threshold shift (PTS) and temporary threshold shift (TTS) in turtles.
5. Turtle behavioural response threshold of 166 dB re 1 μ Pa (SPL; L_p) (NSF 2011), as applied by the US NMFS, along with a sound level associated with behavioural disturbance 175 dB re 1 μ Pa (SPL; L_p) (McCauley et al. 2000b, 2000a).

Additionally, to assess the size of the low-power zone required under the Australian Environment Protection and Biodiversity Conservation (EPBC) Act Policy Statement 2.1, Department of the Environment, Water, Heritage and the Arts (DEWHA 2008), the distance to an unweighted per-pulse SEL of 160 dB re 1 μ Pa²·s (SEL; L_E) is reported.

The following section expands on the thresholds and sound levels for marine mammals, fish, fish eggs, fish larvae, sea turtles, and plankton.

3.1. Marine Mammals

There are two categories of auditory threshold shifts or hearing loss: Permanent Threshold Shift (PTS), a physical injury to an animal's hearing organs; and Temporary Threshold Shift (TTS), a temporary reduction in an animal's hearing sensitivity as the result of receptor hair cells in the cochlea becoming fatigued.

To help assess the potential for the possible injury and hearing sensitivity changes in marine mammals, this report applies the criteria recommended by NMFS (2018), considering both PTS and TTS. These criteria, along with the applied behavioural criteria (NOAA 2019), are summarised in Table 6, with descriptions included in Appendix A.3.1 (auditory impairment) and Appendix A.3.2 (behavioural response), with frequency weighting explained in Appendix A.4. The acoustic metrics in this report reflect the updated ISO standard for acoustic terminology, ISO/DIS 18405.2:2017 (2017).

Table 6. Unweighted SPL and PK, and weighted SEL_{24h} thresholds for acoustic effects on marine mammals.

Hearing group	NOAA (2019)	NMFS (2018)			
	Behaviour	PTS onset thresholds ^a (received level)		TTS onset thresholds ^a (received level)	
	SPL (L_p ; dB re 1 μ Pa)	Weighted SEL _{24h} ($L_{E,24h}$; dB re 1 μ Pa ² ·s)	PK (L_{pk} ; dB re 1 μ Pa)	Weighted SEL _{24h} ($L_{E,24h}$; dB re 1 μ Pa ² ·s)	PK (L_{pk} ; dB re 1 μ Pa)
Low-frequency cetaceans	160	183	219	168	213
Mid-frequency cetaceans		185	230	170	224
High-frequency cetaceans		155	202	140	196

^a Dual metric acoustic thresholds for impulsive sounds: Use whichever results in the largest isopleth for calculating PTS and TTS onset.

L_p denotes sound pressure level period and has a reference value of 1 μ Pa.

L_{pk} denotes unweighted peak sound pressure and has a reference value of 1 μ Pa.

L_E denotes cumulative sound exposure over a 24-hour period and has a reference value of 1 μ Pa²·s.

Subscripts indicate the designated marine mammal auditory weighting.

3.2. Fish, Fish Eggs, Fish Larvae and Plankton

In 2006, the Working Group on the Effects of Sound on Fish and Turtles was formed to continue developing noise exposure criteria for fish and turtles, work begun by a panel convened by NOAA two years earlier. The resulting guidelines included specific thresholds for different levels of effects and for different groups of species (Popper et al. 2014). These guidelines defined quantitative thresholds for three types of immediate effects:

- Mortality, including injury leading to death.
- Recoverable injury, including injuries unlikely to result in mortality, such as hair cell damage and minor haematoma.
- TTS.

Masking and behavioural effects can be assessed qualitatively, by assessing relative risk rather than by specific sound level thresholds. However, as these depend upon activity-based subjective distances, these effects are not addressed in this report and are included in Table 7 for completeness only. Because the presence or absence of a swim bladder has a role in hearing, fish's susceptibility to injury from noise exposure varies depending on the species and the presence and possible role of a swim bladder in hearing. Thus, different guidelines were proposed for fish without a swim bladder (also appropriate for sharks and applied to whale sharks in the absence of other information), fish with a swim bladder not used for hearing, and fish that use their swim bladders for hearing. Turtles, fish eggs, and fish larvae are considered separately. Table 7 lists relevant effects thresholds from Popper et al. (2014).

The SEL metric integrates noise intensity over some period of exposure. Because the period of integration for regulatory assessments is not well defined for sounds that do not have a clear start or end time, or for very long-lasting exposures, it is required to define a time. Popper et al. (2014) recommend applying a standard period, where this is either defined as a justified fixed period or the duration of the activity; however, Popper et al. (2014) also included caveats about how long the fish will be exposed because they can move (or remain in location) and so can the source. Popper et al. (2014) summarises that in all TTS studies considered, fish that showed TTS recovered to normal hearing levels within 18–24 hours. Due to this, a period of accumulation of 24 hours has been applied in this study for SEL, which is similar to that applied for marine mammals in NMFS (2016, 2018).

Additional information is provided in Appendix A.5.

Table 7. Guidelines for seismic noise exposure for fish, adapted from Popper et al. (2014).

Type of animal	Mortality and Potential mortal injury	Impairment			Behaviour
		Recoverable injury	TTS	Masking	
Fish: No swim bladder (particle motion detection)	>219 dB SEL _{24h} or >213 dB PK	>216 dB SEL _{24h} or >213 dB PK	>>186 dB SEL _{24h}	(N) Low (I) Low (F) Low	(N) High (I) Moderate (F) Low
Fish: Swim bladder not involved in hearing (particle motion detection)	210 dB SEL _{24h} or >207 dB PK	203 dB SEL _{24h} or >207 dB PK	>>186 dB SEL _{24h}	(N) Low (I) Low (F) Low	(N) High (I) Moderate (F) Low
Fish: Swim bladder involved in hearing (primarily pressure detection)	207 dB SEL _{24h} or >207 dB PK	203 dB SEL _{24h} or >207 dB PK	186 dB SEL _{24h}	(N) Low (I) Low (F) Moderate	(N) High (I) High (F) Moderate
Fish eggs and fish larvae (relevant to plankton)	>210 dB SEL _{24h} or >207 dB PK	(N) Moderate (I) Low (F) Low	(N) Moderate (I) Low (F) Low	(N) Low (I) Low (F) Low	(N) Moderate (I) Low (F) Low

Peak sound level (PK) dB re 1 μ Pa; SEL_{24h} dB re 1 μ Pa²-s. All criteria are presented as sound pressure, even for fish without swim bladders, since no data for particle motion exist. Relative risk (high, moderate, or low) is given for animals at three distances from the source defined in relative terms as near (N), intermediate (I), and far (F).

3.3. Sea Turtles

There is a paucity of data regarding responses of turtles to acoustic exposure, and no studies of hearing loss due to exposure to loud sounds. Popper et al. (2014) suggested thresholds for onset of mortal injury (including PTS) and mortality for sea turtles and, in absence of taxon-specific information, adopted the levels for fish that do not hear well (suggesting that this likely would be conservative for sea turtles).

Finneran et al. (2017) presented revised thresholds for sea turtle injury and hearing impairment (TTS and PTS). Their rationale is that sea turtles have best sensitivity at low frequencies and are known to have poor auditory sensitivity (Bartol and Ketten 2006, Dow Piniak et al. 2012). Accordingly, TTS and PTS thresholds for turtles are likely more similar to those of fishes than to marine mammals (Popper et al. 2014).

McCauley et al. (2000b) observed the behavioural response of caged sea turtles—green (*Chelonia mydas*) and loggerhead (*Caretta caretta*)—to an approaching seismic airgun. For received levels above 166 dB re 1 μ Pa (SPL), the sea turtles increased their swimming activity and above 175 dB re 1 μ Pa they began to behave erratically, which was interpreted as an agitated state. The 166 dB re 1 μ Pa level has been used as the threshold level for a behavioural disturbance response by NMFS and applied in the Arctic Programmatic Environment Impact Statement (PEIS) (NSF 2011). In addition the 175 dB re 1 μ Pa level from McCauley et al. (2000b) is recommended as a criterion for behavioural disturbance. The Recovery Plan for Marine Turtles in Australia (Department of the Environment and Energy et al. 2017) acknowledges the 166 dB re 1 μ Pa SPL reported by McCauley et al. (2000b) as the level that may result in a behavioural response to marine turtles. These thresholds are shown in Table 8.

Table 8. Acoustic effects of impulsive noise on sea turtles: Unweighted SPL, SEL_{24h}, and PK thresholds.

Effect type	Criterion	SPL (L_p ; dB re 1 μ Pa)	Weighted SEL _{24h} ($L_{E,24h}$; dB re 1 μ Pa ² -s)	PK (L_{pk} ; dB re 1 μ Pa)
Behavioural response	NSF (2011) DoEE (2017)	166	NA	
Behavioural disturbance	McCauley et al. (2000a)	175		
PTS onset thresholds* (received level)	Finneran et al. (2017)	NA	204	232
TTS onset thresholds* (received level)			189	226

* Dual metric acoustic thresholds for impulsive sounds: Use whichever results in the largest isopleth for calculating PTS and TTS onset. If a non-impulsive sound has the potential of exceeding the peak sound pressure level thresholds associated with impulsive sounds, these thresholds should also be considered.

L_p denotes sound pressure level period and has a reference value of 1 μ Pa.

$L_{pk,flat}$ denotes peak sound pressure is flat weighted or unweighted and has a reference value of 1 μ Pa.

L_E denotes cumulative sound exposure over a 24 h period and has a reference value of 1 μ Pa²-s.

4. Methods

4.1. Parameters Overview

Sound propagation was modelled up to 100 km from each single-impulse modelled site (listed in Table 5). The specifications of the seismic source and the environmental parameters used in the propagation models are described in detail in Appendix C. A single sound speed profile for August was considered in this modelling study; this was identified as the month that would provide the farthest propagation over the potential operational window (January to April or July to October).

4.2. Acoustic Source Model

The pressure signature of the individual airguns and the composite decidecade-band point-source equivalent directional levels (i.e., source levels) of the seismic sources were modelled with JASCO's Airgun Array Source Model (AASM). Although AASM accounts for notional pressure signatures of each seismic source with respect to the effects of surface-reflected signals on bubble oscillations and inter-bubble interactions, the surface-reflected signal (known as surface ghost) is not included in the far-field source signatures. The acoustic propagation models account for those surface reflections, which are a property of the propagating medium rather than the source.

AASM considers:

- Array layout.
- Volume, tow depth, and firing pressure of each airgun.
- Interactions between different airguns in the array.

The seismic source considered (Appendix C.5) was modelled over AASM's full frequency range, up to 25 kHz. Appendix B.1 details this model.

4.3. Sound Propagation Models

Two sound propagation models were used to predict the acoustic field around the selected 3150 in³ seismic source:

- Combined range-dependent parabolic equation and Gaussian beam acoustic ray-trace model (MONM-BELLHOP, 5 Hz to 25 kHz).
- Full Waveform Range-dependent Acoustic Model (FWRAM, 5 Hz to 1024 Hz).

The models were used in combination to characterise the acoustic fields in terms of SEL, SPL, PK, and PK-PK. Appendix B details each model. MONM-BELLHOP was used to calculate SEL in an area 360° around each source location. The model calculated propagation loss up to distances of 100 km, with a horizontal separation of 20 m between receiver points along the modelled radials. The sound fields were modelled with a horizontal angular resolution of $\Delta\theta = 2.5^\circ$ for a total of $N = 144$ radial planes. Receiver depths were chosen to span the entire water column over the modelled area, from 2 m to a maximum of 2500 m, with step sizes that increased with depth. To supplement the MONM results, high-frequency predictions of propagation loss were modelled using Bellhop for frequencies from 2000 Hz to 25 kHz. The MONM and Bellhop predictions were combined to produce results for the full frequency-range of interest.

FWRAM was used to model synthetic seismic pulses and to generate a generalised range-dependent SEL to SPL conversion function (Appendix C.2) for the considered modelled sites. FWRAM was run to 100 km at modelled site 2, along four radials (fore and aft endfire, and port and starboard broadside) for computational efficiency. A single modelled site was used with FWRAM due to the relatively constant and similar water depths throughout the survey area. A horizontal range step of 20 m was used. Along each radial, computation was done at a variable depth increment starting at

2 m with step sizes that increased with depth. Receivers were selected to span the entire water column. The range-dependent conversion function was applied to predicted per-pulse SEL results from MONM and Bellhop to estimate SPL values. FWRAM was also used to calculate water column PK and PK-PK levels.

During a seismic survey, new sound energy is introduced into the environment with each pulse from the seismic source. While some effect criteria are based on the per-pulse energy released, others, such as the marine mammal, turtle, and fish SEL criteria used in this report account for the total acoustic energy marine fauna is subjected to over a specified period of time, defined in this report as 24 h. An accurate assessment of the accumulated sound energy depends not only on the parameters of each seismic pulse impulse, but also on the number of impulses delivered in a period and the relative positions of the impulses. Appendix C.3 provides additional details on the methods used to calculate the accumulated sound energy for the considered scenarios.

4.4. Animal Movement and Exposure Modelling

The JASCO Animal Simulation Model Including Noise Exposure (JASMINE) was used to predict the exposure of animats to sound arising from the seismic activity. JASMINE integrates the predicted sound field with biologically meaningful movement rules for each marine mammal species (pygmy blue whales for the current analysis) that result in an exposure history for each animat in the model. In JASMINE, the sound received by the animats is determined by the proposed seismic activity. As illustrated in Figure 3, animats are programmed to behave like the marine animals that may be present in the area. The parameters used for forecasting realistic behaviours (e.g., diving and foraging depth, swim speed, surface times) are determined and interpreted from marine mammal studies (e.g., tagging studies) where available, or reasonably extrapolated from related or comparable species. An individual animat's sound exposure levels are summed over a 24 h duration to determine its total received energy, and then compared to the relevant threshold criteria. For PK and SPL metrics, the maximum exposure is evaluated against single impulse threshold criteria, for each 24 h period. For additional information on JASMINE, see Appendix B.4.

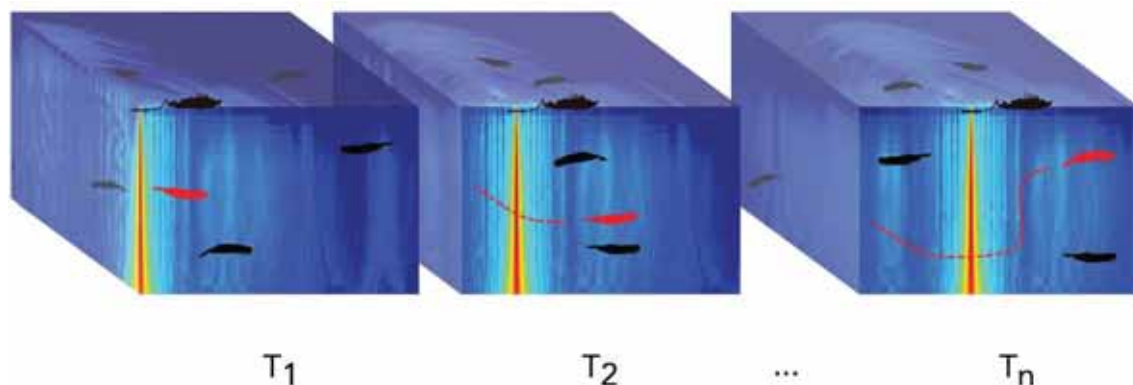


Figure 3. Cartoon of animats in a moving sound field. Example animat (red) shown moving with each time step (T_x). The acoustic exposure of each animat is determined by where it is in the sound field, and its exposure history is accumulated as the simulation steps through time.

The exposure criteria for impulsive sounds (described in Section 3) were used to determine the number of animats exceeding thresholds. To generate statistically reliable probability density functions, model simulations were run with animat densities of 2 animats/km², as this increases the probability of encounter, and thus more robust exposure range estimates. The modelling results are not related to real-world density estimates for pygmy blue whales within the migration BIA, as the number of animals potentially exposed is not calculated. To evaluate PTS, TTS, and behavioural response, exposure results were obtained using detailed behavioural information for migrating pygmy blue whales (described in Section 4.4.2). The simulation was run for a representative period of seven days, with the spatial distribution of animats restricted to the BIA.

The seismic source was modelled as a vessel towing an airgun array at a speed of 4.5 knots, with an impulse interval of 12.5 m. The simulated source track followed a racetrack configuration with a turn time of ~3.4 h. At the time and location of each seismic pulse, the modelled source location with the most similar water depth was selected for exposure modelling. The track lines along with the acoustic modelling locations are shown in Figure 2. Note that the closest point of approach of the acquisition lines to the migration BIA for the scenario is approximately 29.9 km.

4.4.1. Exposure-based Radial Distance Estimation

The results from the animal movement and exposure modelling provided a way to estimate radial distances to effect thresholds. The distance to the closest point of approach (CPA) for each of the animats was recorded. The $ER_{95\%}$ (95% Exposure Range) is the horizontal distance that includes 95% of the animat CPAs that exceeded a given effect threshold (Figure 4). The ER_{max} is the maximum distance at which any animat was exposed above threshold in the simulation. Within the $ER_{95\%}$ and ER_{max} radial distances, there are generally some proportion of animats that do not exceed threshold criteria. The probability that an animat is exposed above threshold within the $ER_{95\%}$ or ER_{max} is provided in the results tables.

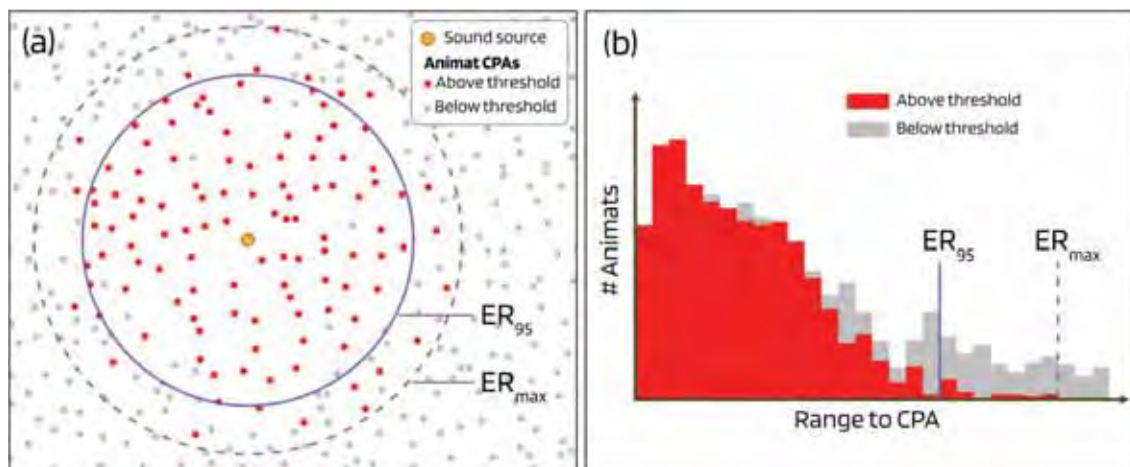


Figure 4. Example distribution of animat closest points of approach (CPAs). Panel (a) shows the horizontal distribution of animats near a sound source. Panel (b) shows the distribution of distances to animat CPAs. The 95% and maximum exposure ranges ($ER_{95\%}$ and ER_{max}) are indicated in both panels.

4.4.2. Pygmy Blue Whale Behaviour

The planned Scarborough 4D MSS is adjacent to the migration BIA for pygmy blue whales therefore, migratory behaviour was the only behavioural profile considered. Detailed information on pygmy blue whales was derived from a range of sources that used multi-sensor tags to record fine-scale dive and movement behaviour (Owen et al. 2016, Möller et al. 2020). Where information was unavailable for pygmy blue whales, parameters were derived from blue whale (*B. musculus*) tagging data (Goldbogen et al. 2011).

Multi-sensor tags typically record the depth of an animal along with various movement parameters such as swim speed and their body's orientation. Owen et al. (2016) equipped a sub-adult pygmy blue whale with a multi-sensor tag off Western Australia. They identified dives for their tagged animal as migratory, feeding, or exploratory (i.e., no lunges recorded which would indicate feeding). Pygmy blue whales in the simulation area are presumed to be migrating, and so feeding was not included in the model. Exploratory dives were considered to be part of migratory behaviour, and so the two dive types were modelled together such that the animats were migrating 95% of the time and engaged in exploratory dives 5% of the time (Owen et al. 2016). The analysis of the dive data showed that the depth of migratory dives was highly consistent over time and unrelated to local bathymetry. The mean depth of migratory dives was 14 ± 4 m while the mean maximum depth of exploratory dives was 107 ± 81 m (23–320 m range).

The behaviour of migrating pygmy blue whales was modelled to reflect animals transiting through the modelling area on a 50° track. This represents the animals migrating along the west coast of Australia, to and from Indonesia (Double et al. 2014, DoE (AU) 2015-2025). The speed of travel for migratory behaviour (1.17 ± 0.60 m/s) and exploratory dives (0.88 ± 0.14 m/s) were calculated from data presented in Möller et al. (2020).

5. Results

5.1. Acoustic Source Levels and Directivity

AASM (Section 4.2) was used to predict the horizontal and vertical overpressure signatures and corresponding power spectrum levels for the seismic sources, with results provided in Appendix C.5.1 along with the horizontal directivity plots for the selected source.

Table 9 shows the PK and per-pulse SEL source levels in the horizontal-plane broadside (perpendicular to the tow direction), endfire (along the tow direction), and vertical directions for the worst-case modelled array signature (a 3150 in³ seismic source). The vertical source level that accounts for the “surface ghost” (the out of phase reflected pulse from the water surface) is also presented to make it easier to compare the output of other seismic source models.

Figure C-6 in Appendix C.5.1 shows the broadside, endfire, and vertical overpressure signature and corresponding power spectrum levels for the source. The signature consists of a strong primary peak, related to the initial release of high-pressure air, followed by a series of pulses associated with bubble oscillations. Most energy was produced at frequencies below 500 Hz. Frequency-dependent peaks and nulls in the spectrum result from interference among airguns in the source and correspond with the volumes and locations of the airguns relative to each other.

Table 9. Far-field source level specifications for the 3150 in³ seismic source, for a 7 m tow depth. Source levels are for a point-like acoustic source with equivalent far-field acoustic output in the specified direction. Sound level metrics are per-pulse and unweighted.

Direction	Peak source pressure level ($L_{s,pk}$) (dB re 1 μ Pa m)	Per-pulse source SEL ($L_{s,E}$) (dB 1 μ Pa ² m ² s)	
		10–2000 Hz	2000–25000 Hz
Broadside	248.1	224.1	183.9
Endfire	246.3	223.2	183.9
Vertical	254.4	227.4	193.5
Vertical (surface affected source level)	254.4	230.2	196.5

5.2. Per-Pulse Sound Fields

This section presents the per-pulse sound fields in terms of maximum-over-depth SPL, SEL, PK, and PK-PK. The different metrics are presented for the following reasons:

- SPL sound fields were used to determine the distances to marine mammal and turtle behavioural thresholds (see Sections 3.1 and 3.3).
- Per-pulse SEL sound fields are used as inputs into the 24 h SEL scenarios and to provide context for the radial distance to 160 dB re 1 μ Pa²-s, relevant for the EPBC Act Policy Statement 2.1 (DEWHA 2008).
- PK metrics within the water column are relevant to thresholds and guidelines for marine mammals, sea turtles, fish, fish eggs and larvae (Sections 3.1 –3.3)

The maximum and 95% distances to per-pulse SEL and SPL metrics are presented in Tables 10 and 11. The SPL sound fields, and distances to relevant isopleths can be visualised on the contour maps presented in Figures 5 to 8, whilst the per-pulse SEL sound field maps are presented in Appendix D. The SPL sound fields are also presented as vertical slices for selected sites along the endfire and broadside directions out to 50 km, with the airgun array in the centre (Figures 9 and 10).

Maximum distances to PK and PK-PK thresholds were calculated for both modelled sites in the water column, with maximum-over-depth results presented in Table 12.

5.2.1. Tabulated Results

5.2.1.1. Entire Water Column

Table 10. Maximum (R_{max}) and 95% ($R_{95\%}$) horizontal distances (in km) from the 3150 in³ source to modelled unweighted maximum-over-depth per-pulse SEL isopleths from the modelled single impulse sites, with water depth indicated. Distances are reported as the maximum considering both tow directions at each site.

Per-pulse SEL (L_p , dB re 1 $\mu\text{Pa}^2\cdot\text{s}$)	Site 1 (1101 m depth)		Site 2 (925 m depth)	
	R_{max}	$R_{95\%}$	R_{max}	$R_{95\%}$
200	–	–	–	–
190	0.05	0.05	0.05	0.05
180	0.16	0.13	0.16	0.13
170	0.48	0.41	0.49	0.41
160 ^a	2.1	1.75	2.17	1.80
150	9.28	7.4	8.40	7.12
140	34.6	25.3	33.4	27.2
130	>100	/	>100	/

^a Low power zone assessment criteria DEWHA (2008).

A slash indicates that the $R_{95\%}$ radius to threshold is not reported because the R_{max} is greater than the maximum modelling extent. A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

Table 11. Maximum (R_{max}) and 95% ($R_{95\%}$) horizontal distances (in km) from the 3150 in³ source to modelled maximum-over-depth SPL isopleths from the modelled single impulse sites, with water depth indicated. Distances are reported as the maximum considering both tow directions at each site.

SPL (L_p , dB re 1 μPa)	Site 1 (1101 m depth)		Site 2 (925 m depth)	
	R_{max}	$R_{95\%}$	R_{max}	$R_{95\%}$
200	0.03	0.03	0.03	0.03
190	0.13	0.11	0.13	0.11
180	0.43	0.37	0.43	0.37
175 ^a	0.76	0.63	0.75	0.63
170	1.74	1.32	1.86	1.51
166 ^b	3.87	2.84	3.72	3.23
160 ^c	7.28	4.61	6.99	6.05
150	22.3	16.8	22.6	16.9
140	84.9	60.2	86.7	65.3
130	>100	/	>100	/

^a Threshold for turtle behavioural disturbance from impulsive noise (McCauley et al. 2000b).

^b Threshold for turtle behavioural response to impulsive noise (NSF 2011).

^c Marine mammal behavioural threshold for impulsive sound sources (NOAA 2019).

A slash indicates that the $R_{95\%}$ radius to threshold is not reported because the R_{max} is greater than the maximum modelling extent.

Table 12. Maximum (R_{max}) horizontal distances (km) from the 3150 in³ array to modelled maximum-over-depth peak pressure level (PK) thresholds based on the NOAA Technical Guidance (NMFS 2018) for marine mammals, and Popper et al. (2014) for fish and Finneran et al. (2017) for turtles from the modelled single impulse Site 2, with water depth indicated.

Hearing group		PK threshold (L_{pk} , dB re 1 μ Pa)	Distance R_{max} (km)
			Site 2 (925 m depth)
Low-frequency cetaceans	PTS	219	0.03
	TTS	213	0.06
Mid-frequency cetaceans	PTS	230	-
	TTS	224	-
High-frequency cetaceans	PTS	202	0.19
	TTS	196	0.39
Sea turtles	PTS	232	-
	TTS	226	-
Fish: No swim bladder (also applied to sharks)		213	0.06
Fish: Swim bladder not involved in hearing; Swim bladder involved in hearing Fish eggs, larvae and plankton		207	0.11

A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

5.2.2. Sound field maps and graphs

5.2.2.1. Sound Level Contour Maps

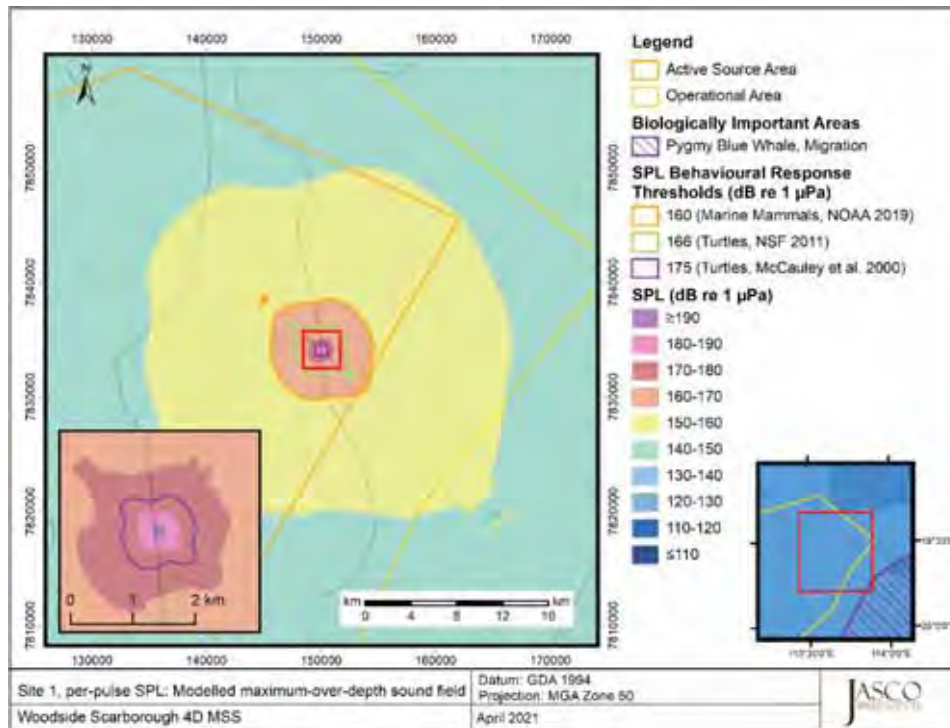


Figure 5. Site 1, tow azimuth 40°, SPL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps, and the isopleths for behavioural response thresholds for marine mammals and turtles.

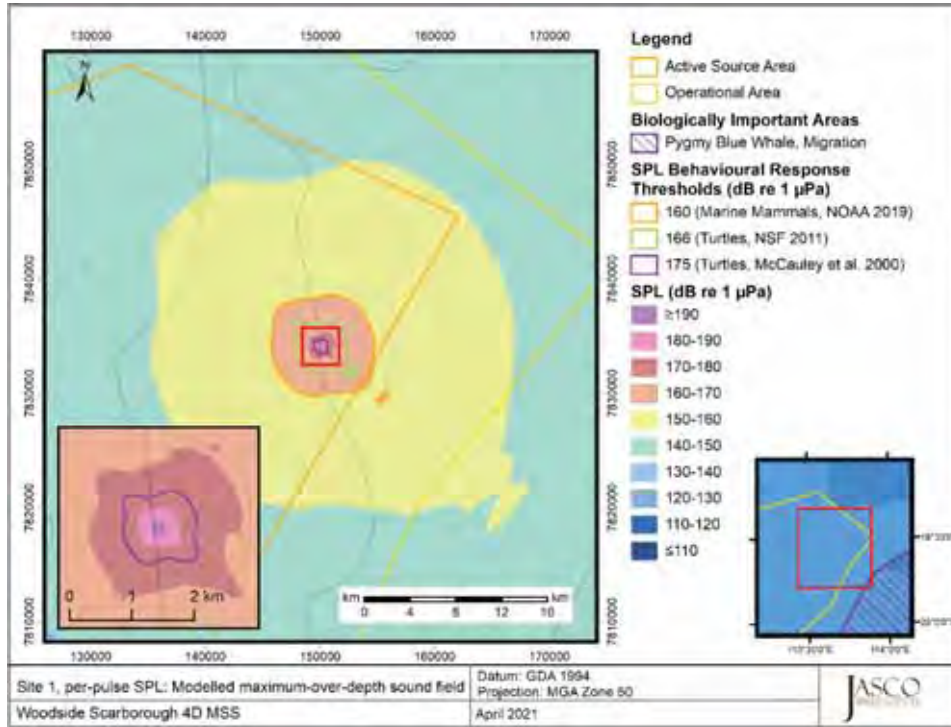


Figure 6. Site 1, tow azimuth 220°, SPL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps, and the isopleths for behavioural response thresholds for marine mammals and turtles.

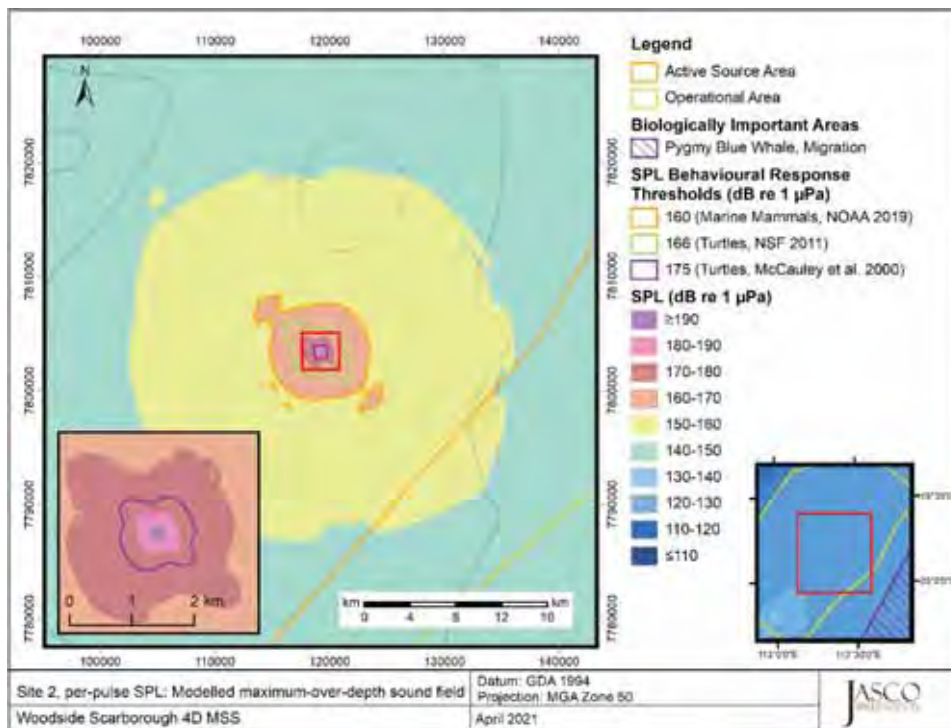


Figure 7. Site 2, tow azimuth 40°, SPL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps, and the isopleths for behavioural response thresholds for marine mammals and turtles.

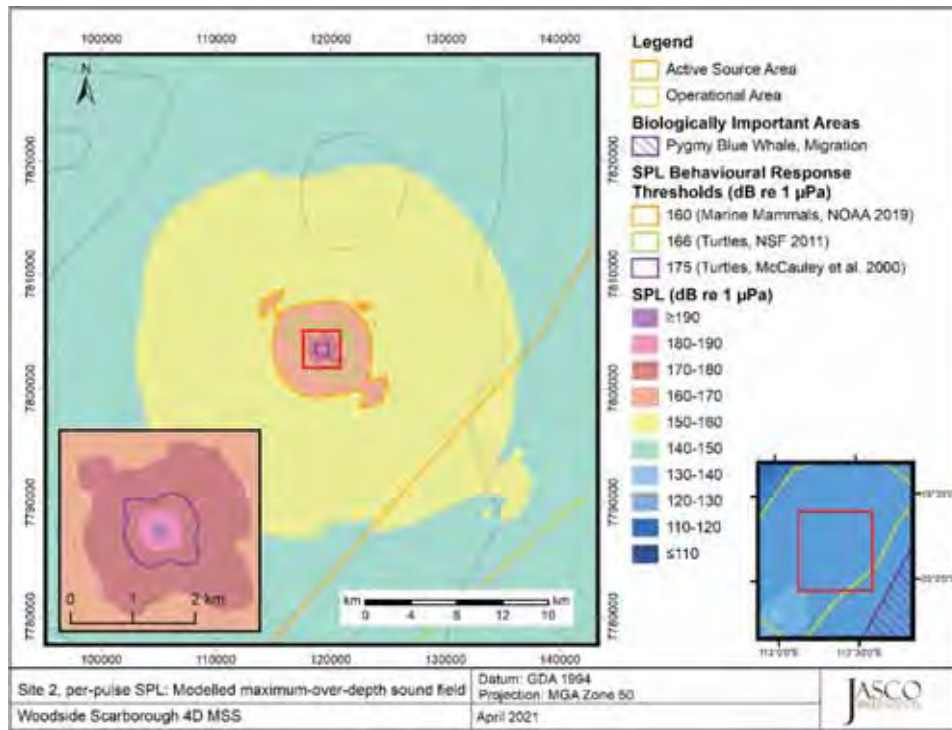


Figure 8. Site 2, tow azimuth 220°, SPL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps, and the isopleths for behavioural response thresholds for marine mammals and turtles.

5.2.2.2. Vertical Slices of Modelled Sound Fields

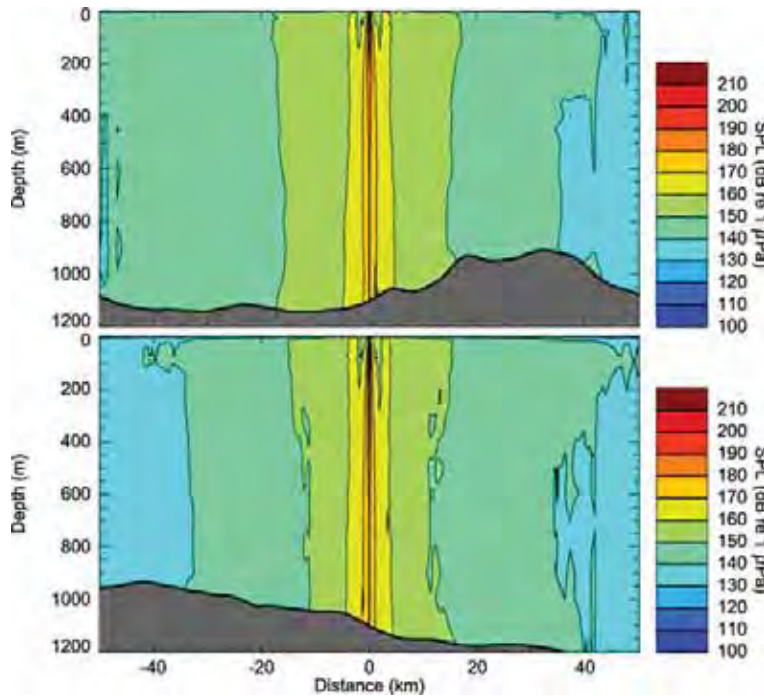


Figure 9. Site 1, tow azimuth 40°, SPL: Sound level contours in vertical slice of the sound field, perpendicular to (broadside, top) and along the tow direction (endfire, bottom). The positive distance direction for the broadside slice is 90° counter-clockwise ('Port') from the tow azimuth. The positive distance direction for the endfire slice is in line with the tow azimuth (the direction of transit).

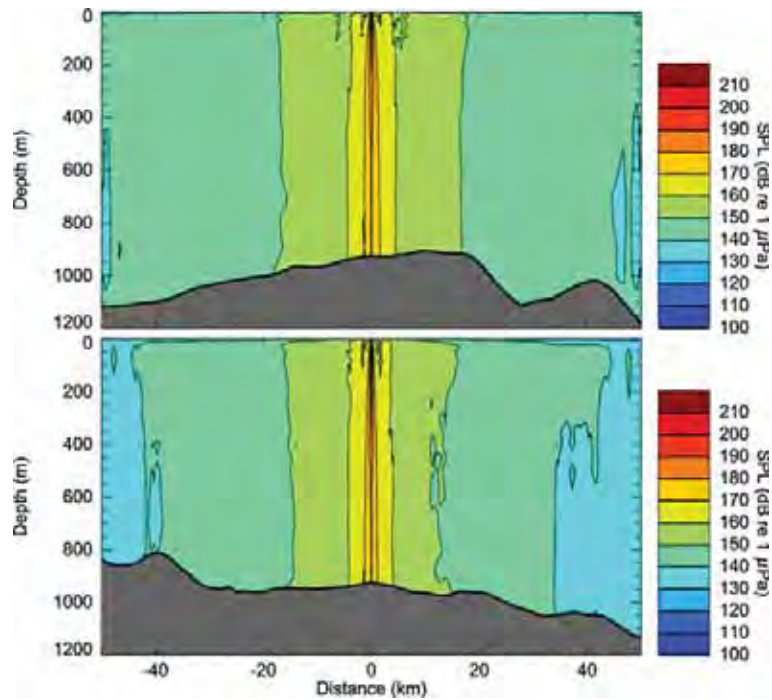


Figure 10. *Site 2, tow azimuth 40°*, SPL: Sound level contours in vertical slice of the sound field, perpendicular to (broadside, top) and along the tow direction (endfire, bottom). The positive distance direction for the broadside slice is 90° counter-clockwise ('Port') from the tow azimuth. The positive distance direction for the endfire slice is in line with the tow azimuth (the direction of transit).

5.3. Multiple Pulses Sound Fields

This section presents the sound fields in terms of SEL accumulated over 24 h of survey for the modelled SEL_{24h} scenario. Frequency-weighted SEL_{24h} sound fields were used to estimate the maximum and 95% distances (R_{\max} and $R_{95\%}$; calculated as detailed in Appendix C.1) to marine mammals and turtle PTS and TTS thresholds (Table 13), and to estimate maximum distance and the area to injury and TTS thresholds for fish over the entire water column (Table 14). Whilst seafloor sound levels were not specifically assessed, the distribution of the sound within the water column (Figures 9 and 10) indicates the ranges at the seafloor would not exceed maximum-over-depth distances.

The SEL_{24h} sound fields are presented as a contour map in Figure 11. This figure presents the unweighted SEL_{24h} in 10 dB steps, as well as the isopleths corresponding to criteria thresholds. Only contours at distances longer than the nearfield of the seismic source are rendered.

5.3.1. Tabulated Results

Table 13. *Marine mammal and sea turtle criteria*: Maximum (R_{\max}) horizontal distances (in km) from the survey lines to permanent threshold shift (PTS) and temporary threshold shift (TTS) thresholds considering 24 h of survey activity (maximum-over-depth).

Hearing group	Weighted SEL thresholds ($L_{E,24h}$; dB re 1 $\mu\text{Pa}^2\cdot\text{s}$)	R_{\max} (km)	Area (km ²)
<i>PTS</i>			
Low-frequency cetaceans	183	0.38	122
Mid-frequency cetaceans	185	–	–
High-frequency cetaceans	155	–	–
Sea turtles	204	0.05	13.8
<i>TTS</i>			
Low-frequency cetaceans	168	60.7	9863
Mid-frequency cetaceans	170	–	–
High-frequency cetaceans	140	0.16	52.6
Sea turtles	189	0.28	88.2

A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

Table 14. *Fish criteria*: Maximum horizontal distances (R_{\max} , in km) from the survey lines and area (km²) to injury and temporary threshold shift (TTS) thresholds considering 24 h of survey activity (maximum-over-depth).

Marine fauna group	SEL _{24h} threshold ($L_{E,24h}$; dB re 1 $\mu\text{Pa}^2\cdot\text{s}$)	R_{\max} (km)	Area (km ²)
<i>Mortality and potential mortal injury</i>			
I	219	0.05	13.0
II, fish eggs and fish larvae	210	0.05	13.8
III	207	0.05	13.8
<i>Fish recoverable injury</i>			
I	216	0.05	13.0
II, III	203	0.05	14.1
<i>Fish TTS</i>			
I, II, III	186	4.5	1210

Fish I–No swim bladder; Fish II–Swim bladder not involved with hearing; Fish III–Swim bladder involved with hearing.

5.3.2. Sound Level Contour Maps

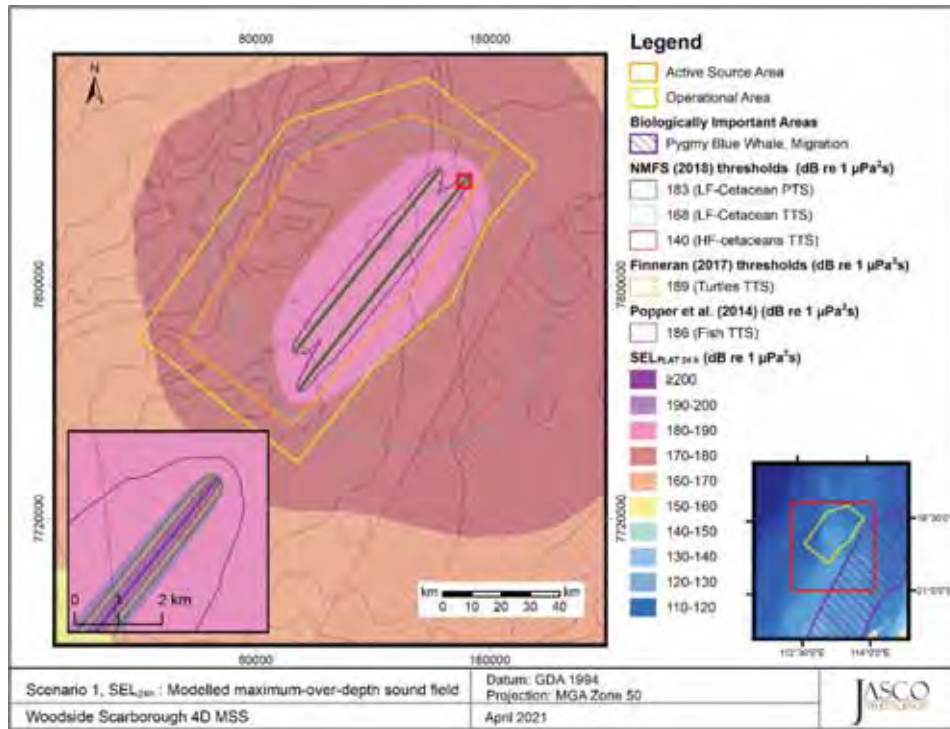


Figure 11. *Accumulated SEL_{24h} Scenario*: Sound level contour map showing unweighted maximum-over-depth SEL_{24h} results, along with isopleths for cetaceans, turtles, and fish. Thresholds omitted here were not reached or not long enough to display graphically. Refer to Tables 13 and 14 for tabulated radii.

5.4. Animal Movement Exposure Ranges

A summary of radial distances to exposure thresholds for migrating pygmy blue whales is included in Table 15. Results include ER_{95%} and ER_{max} exposure ranges calculated for the 160 dB behavioural response threshold and PK and SEL thresholds for both TTS and PTS.

Table 15. Summary of animat simulation results for migrating pygmy blue whales. The 95th percentile exposure ranges (ER_{95%}) and maximum exposure ranges (ER_{max}) in km and probability of animats being exposed above threshold within the ER_{95%} and ER_{max} are provided.

Threshold		Threshold level (dB)	Maximum acoustic radial distance to threshold (km)	ER _{95%}		ER _{max}	
Description	Distance (km)			Probability of exposure (%)	Distance (km)	Probability of exposure (%)	
TTS	PK	213 ^a	0.06	*	0	*	0
	SEL _{24h}	168 ^b	60.7	*	0	*	0
PTS	PK	219 ^a	0.03	*	0	*	0
	SEL _{24h}	183 ^c	0.38	*	0	*	0
Behavioural response		160 ^c	7.28	*	0	*	0

^a PK (L_{pk} ; dB re 1 μPa)

^b LF-weighted SEL_{24h} ($L_{E,24h}$; dB re 1 μPa²·s)

^c SPL (L_p ; dB re 1 μPa)

An asterisk indicates that no animats were exposed to sound levels exceeding threshold criteria.

6. Discussion and Conclusions

This modelling study predicted underwater sound levels associated with the planned Scarborough 4D MSS. The underwater sound field was modelled for a 3150 in³ seismic source (Appendix C.5). An analysis of seasonal sound speed profiles was conducted (Appendix C.4.2) to determine which month within the proposed acquisition period was the most conducive to sound propagation. The modelling also accounted for site-specific bathymetric variations (Appendix C.4.1) and local geoaoustic properties (Appendix C.4.3).

Most acoustic energy from the seismic sources is output at lower frequencies, in the tens to hundreds of hertz. Simulation results showed the array has a pronounced broadside directivity for 1/3-octave-bands between approximately 100 Hz to about 300 Hz (Appendix C.5.1), which leads to a noticeable axial bulge in the modelled acoustic footprints.

6.1. Per-Pulse and Multiple Pulse Sound Fields

At both single impulse sites the distance to reported isopleths were generally greater in the broadside direction than in the endfire direction, a difference apparent in footprint maps in Section 5.2.2.1. The array directionality and frequency content was the primary driver of levels at longer distances. When in deeper water, the seismic source will have a lower “cut-off frequency (f_c)” than if the source were in shallower water. The cut-off frequency is a single number that describes how much acoustic energy can propagate with minimal loss between the sea surface and seafloor interfaces. For a given acoustic signal, frequencies below f_c are subject to higher loss compared to frequencies above the f_c (Jensen et al. 2011). For this environment, the cut-off frequency was less than 10 Hz, which allows for a large amount of low-frequency energy to propagate in the water column.

Considering the NMFS (2018) SEL_{24h} criteria, low- and high-frequency cetaceans are predicted to experience PTS and TTS (Tables 12 and 13). The footprints and radial distance maxima for all accumulated SEL thresholds are influenced by the consistent water depth with the surrounding area of the survey. Water depths on average 900 m allow the large amount of low-frequency energy to propagate within the water column, which can result in levels propagating to significant distances away from the source by being continually refracted within the deep sound channel. Furthermore, the presence of a slight upward refracting layer near the sea surface also has the potential to trap levels at high frequencies which would otherwise dissipate more rapidly with distance from the source due to spreading and seabed loss.

6.2. Animal Movement Exposure Ranges

The estimated sound fields produced by source and propagation models for the seismic survey were incorporated into a sound exposure model to estimate the radial distance within which 95% of the exposure exceedances occur (ER_{95%}), along with the probability that an animal with a closest point of approach within that distance would be exposed above the relevant threshold.

SEL, PK, and behavioural SPL thresholds were not exceeded since the closest point of approach to the BIA (29.9 km) was longer than the maximum possible distance to threshold (Figure 2). These results differ from the radial distances predicted by the acoustic modelling because they assumed a static receiver. Animal movement modelling simulations incorporate the real-world movements of migrating pygmy blue whales within the migration BIA.

6.3. Summary

This section presents summaries of the distances to the noise effect criteria applied in this study (Section 3) as relevant to the effect assessment. The effect criteria for impairment of marine mammals, fish, and sea turtles use dual metrics (PK and SEL_{24h}), and the longest distance associated with either metric is required to be applied, and thus is presented in this summary.

SEL_{24h} is a cumulative metric that reflects the dosimetric effect of noise levels within 24 h based on the assumption that an animal is consistently exposed to such noise levels at a fixed position. Where the corresponding SEL_{24h} radii for are longer than those for peak pressure criteria, they often represent an unlikely worst-case scenario. More realistically, marine mammals, fish, and sea turtles would not remain in the same location for 24 h, but rather a shorter period, depending upon their behaviour and the source's proximity and movements. Therefore, a reported radius for SEL_{24h} criteria does not mean that marine fauna travelling within this radius of the source will be impaired, but rather that an animal could be exposed to the sound level associated with impairment (either PTS or TTS) if it remained in that location for 24 h.

Marine mammals

- Table 16 summarises the distances to criteria for marine mammals.

Table 16. Maximum (R_{max}) horizontal distances (in km) from modelled sites or scenarios to behavioural response thresholds and PTS and TTS thresholds for marine mammals (PK values from Table 12 and SEL_{24h} values from Table 13).

Hearing group	Modelled distance to effect threshold (R_{max})		
	Behavioural response ^a	Impairment: TTS ^b	Impairment: PTS ^b
LF cetaceans	7.28	60.7	0.38
MF cetaceans		–	–
HF cetaceans		0.39	0.19

^a Noise exposure criteria: NOAA (2019)

^b Noise exposure criteria: NMFS (2018)

A dash indicates the threshold was not reached within the limits of the modelling resolution (20 m).

Sea turtles

- Table 17 summarises the distances to criteria for sea turtles.

Table 17. Maximum (R_{max}) horizontal distances (in km) from modelled sites or scenarios to behavioural response thresholds and PTS and TTS thresholds for sea turtles (PK values from Table 12 and SEL_{24h} values from Table 13).

Hearing group	Modelled distance to effect threshold (R_{max})			
	Behavioural response ^a	Behavioural disturbance ^b	Impairment: TTS ^c	Impairment: PTS ^c
Turtles	3.87	0.76	0.28	0.05

^a Noise exposure criteria: NSF (2011)

^b Noise exposure criteria: McCauley et al. (2000a)

^c Noise exposure criteria: Finneran et al. (2017)

Fish, fish eggs, fish larvae and plankton

- This modelling study assessed the radial distances to quantitative guidelines based on Popper et al. (2014) and considered both PK and SEL_{24h} (maximum over water column) metrics associated with mortality and potential mortal injury as well as impairment in the following groups:
 - Fish without a swim bladder (also appropriate for sharks in the absence of other information)
 - Fish with a swim bladder that do not use it for hearing
 - Fish that use their swim bladders for hearing
 - Fish eggs, fish larvae and plankton

- Table 18 summarises the distances to injury guidelines for fish, fish eggs, fish larvae and plankton along with the relevant metric and the location of the information within this report.

Table 18. Summary of maximum fish, fish eggs, and larvae injury and TTS onset distances for single impulse and SEL_{24h} modelled scenarios (PK values from Table 12 and SEL_{24h} values from Table 14).

Relevant hearing group	Effect criteria	Scenario 1	
		Metric associated with longest distance to criteria	R_{max} (km)
Fish: No swim bladder	Injury	PK	0.06
	TTS	SEL _{24h}	4.5
Fish: Swim bladder not involved in hearing and Swim bladder involved in hearing	Injury	PK	0.11
	TTS	SEL _{24h}	4.5
Fish eggs, fish larvae and plankton	Injury	PK	0.11

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Appendix A. Acoustic Metrics

A.1. Pressure Related Acoustic Metrics

Underwater sound pressure amplitude is measured in decibels (dB) relative to a fixed reference pressure of $p_0 = 1 \mu\text{Pa}$. Because the perceived loudness of sound, especially pulsed sound such as from seismic airguns, pile driving, and sonar, is not generally proportional to the instantaneous acoustic pressure, several sound level metrics are commonly used to evaluate sound and its effects on marine life. Here we provide specific definitions of relevant metrics used in the accompanying report. Where possible, we follow the American National Standard Institute and International Organization for Standardization definitions and symbols for sound metrics (e.g., ISO 2017, ANSI S1.1-2013), but these standards are not always consistent.

The zero-to-peak sound pressure, or peak sound pressure (PK or $L_{p,pk}$; dB re $1 \mu\text{Pa}$), is the decibel level of the maximum instantaneous acoustic pressure in a stated frequency band attained by an acoustic pressure signal, $p(t)$:

$$L_{p,pk} = 10 \log_{10} \left(\frac{\max |p^2(t)|}{p_0^2} \right) = 20 \log_{10} \left(\frac{\max |p(t)|}{p_0} \right) \quad (\text{A-1})$$

PK is often included as a criterion for assessing whether a sound is potentially injurious; however, because it does not account for the duration of an acoustic event, it is generally a poor indicator of perceived loudness.

The peak-to-peak sound pressure (PK-PK or $L_{p,pk-pk}$; dB re $1 \mu\text{Pa}$) is the difference between the maximum and minimum instantaneous sound pressure, possibly filtered in a stated frequency band, attained by an impulsive sound, $p(t)$:

$$L_{p,pk-pk} = 10 \log_{10} \left(\frac{[\max(p(t)) - \min(p(t))]^2}{p_0^2} \right) \quad (\text{A-2})$$

The sound pressure level (SPL or L_p ; dB re $1 \mu\text{Pa}$) is the root-mean-square (rms) pressure level in a stated frequency band over a specified time window (T ; s). It is important to note that SPL always refers to an rms pressure level and therefore not instantaneous pressure:

$$L_p = 10 \log_{10} \left(\frac{1}{T} \int_T g(t) p^2(t) dt / p_0^2 \right) \quad (\text{A-3})$$

where $g(t)$ is an optional time weighting function. In many cases, the start time of the integration is marched forward in small time steps to produce a time-varying SPL function. For short acoustic events, such as sonar pulses and marine mammal vocalizations, it is important to choose an appropriate time window that matches the duration of the signal. For in-air studies, when evaluating the perceived loudness of sounds with rapid amplitude variations in time, the time weighting function $g(t)$ is often set to a decaying exponential function that emphasizes more recent pressure signals. This function mimics the leaky integration nature of mammalian hearing. For example, human-based fast time-weighted SPL ($L_{p,fast}$) applies an exponential function with time constant 125 ms. A related simpler approach used in underwater acoustics sets $g(t)$ to a boxcar (unity amplitude) function of width 125 ms; the results can be referred to as $L_{p,boxcar 125ms}$. Another approach, historically used to evaluate SPL of impulsive signals underwater, defines $g(t)$ as a boxcar function with edges set to the times corresponding to 5% and 95% of the cumulative square pressure function encompassing the duration of an impulsive acoustic event. This calculation is applied individually to each impulse signal, and the results have been referred to as 90% SPL ($L_{p,90\%}$). In this report, SPL refers to $L_{p,boxcar 125ms}$.

The sound exposure level (SEL or L_E ; dB re $1 \mu\text{Pa}^2\cdot\text{s}$) is the time-integral of the squared acoustic pressure over a duration (T):

$$L_E = 10 \log_{10} \left(\int_T p^2(t) dt / T_0 p_0^2 \right) \quad (\text{A-4})$$

where T_0 is a reference time interval of 1 s. SEL continues to increase with time when non-zero pressure signals are present. It is a dose-type measurement, so the integration time applied must be carefully considered for its relevance to effect to the exposed recipients.

SEL can be calculated over a fixed duration, such as the time of a single event or a period with multiple acoustic events. When applied to pulsed sounds, SEL can be calculated by summing the SEL of the N individual pulses. For a fixed duration, the square pressure is integrated over the duration of interest. For multiple events, the SEL can be computed by summing (in linear units) the SEL of the N individual events:

$$L_{E,N} = 10 \log_{10} \sum_{i=1}^N 10^{\frac{L_{E,i}}{10}} \quad (\text{A-5})$$

Because the SPL and SEL are both computed from the integral of square pressure, these metrics are related numerically by the following expression, which depends only on the duration of the time window T :

$$L_p = L_E - 10 \log_{10}(T) \quad (\text{A-6})$$

When applied, the frequency weighting of an acoustic event should be specified, as in the case of weighted SEL (e.g., $L_{E,LF,24h}$; see Appendix A.4).

A.2. Decidecade Band Analysis

The distribution of a sound's power with frequency is described by the sound's spectrum. The sound spectrum can be split into a series of adjacent frequency bands. Splitting a spectrum into 1 Hz wide bands, called passbands, yields the power spectral density of the sound. This splitting of the spectrum into passbands of a constant width of 1 Hz, however, does not represent how animals perceive sound.

Because animals perceive exponential increases in frequency rather than linear increases, analysing a sound spectrum with passbands that increase exponentially in size better approximates real-world scenarios. In underwater acoustics, a spectrum is commonly split into decidecade bands, which are one tenth of a decade wide. They are approximately one third of an octave (base 2) wide and are therefore often referred to as 1/3-octave-bands. Each octave represents a doubling in sound frequency. The centre frequency of the i th band, $f_c(i)$, is defined as:

$$f_c(i) = 10^{\frac{i}{10}} \text{ kHz} \quad (\text{A-7})$$

and the low (f_{lo}) and high (f_{hi}) frequency limits of the i th decade band are defined as:

$$f_{lo,i} = 10^{\frac{-1}{20}} f_c(i) \quad \text{and} \quad f_{hi,i} = 10^{\frac{1}{20}} f_c(i) \quad (\text{A-8})$$

The decidecade bands become wider with increasing frequency, and on a logarithmic scale the bands appear equally spaced (Figure A-1). The acoustic modelling spans from band 7 ($f_c(7) = 5 \text{ Hz}$) to band 44 ($f_c(44) = 25 \text{ kHz}$).

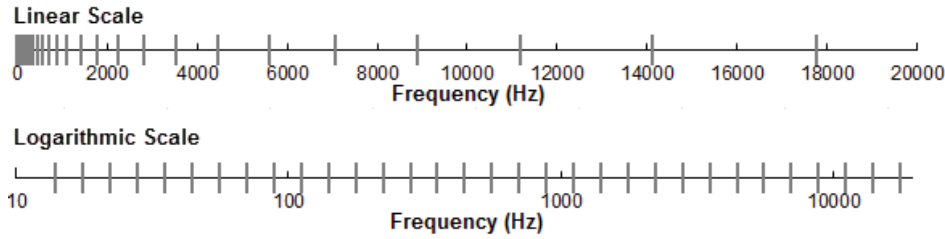


Figure A-1. Decade frequency bands (vertical lines) shown on a linear frequency scale and a logarithmic scale.

The sound pressure level in the i th band ($L_{p,i}$) is computed from the spectrum $S(f)$ between $f_{l0,i}$ and $f_{hi,i}$:

$$L_{p,i} = 10 \log_{10} \int_{f_{l0,i}}^{f_{hi,i}} S(f) df \quad (\text{A-9})$$

Summing the sound pressure level of all the bands yields the broadband sound pressure level:

$$\text{Broadband SPL} = 10 \log_{10} \sum_i 10^{\frac{L_{p,i}}{10}} \quad (\text{A-10})$$

Figure A-2 shows an example of how the decade band sound pressure levels compare to the sound pressure spectral density levels of an ambient noise signal. Because the decade bands are wider than the spectral levels at higher frequencies, the decade band SPL is higher than the spectral levels at higher frequencies. Acoustic modelling of decade bands requires less computation time than 1 Hz bands and still resolves the frequency-dependence of the sound source and the propagation environment.

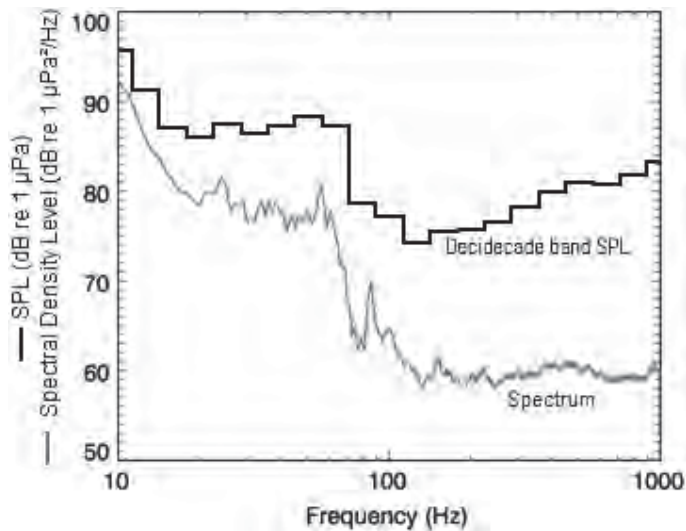


Figure A-2. Sound pressure spectral density levels and the corresponding decade band sound pressure levels of example ambient noise shown on a logarithmic frequency scale.

A.3. Marine Mammal Effect Criteria

It has been long recognised that marine mammals can be adversely affected by underwater anthropogenic noise. For example, Payne and Webb (1971) suggested that communication distances of fin whales are reduced by shipping sounds. Subsequently, similar concerns arose regarding effects of other underwater noise sources and the possibility that impulsive sources—primarily airguns used in seismic surveys—could cause auditory injury. This led to a series of workshops held in the late 1990s, conducted to address acoustic mitigation requirements for seismic surveys and other underwater noise sources (NMFS 1998, ONR 1998, Nedwell and Turnpenny 1998, HESS 1999, Ellison and Stein 1999). In the years since these early workshops, a variety of thresholds have been proposed for both injury and disturbance. The following sections summarize the recent development of thresholds; however, this field remains an active research topic.

A.3.1. Auditory Impairment

There are two categories of auditory threshold shifts (also termed Noise Induced Threshold Shift, NITS): Permanent Threshold Shift (PTS), a physical injury to an animal's hearing system; and Temporary Threshold Shift (TTS), a temporary reduction in an animal's hearing sensitivity as the result of physiological and mechanical processes in the inner ear. While PTS undoubtedly constitutes an injury, TTS (as a temporary effect) was not considered in the same way. However, recent research clearly indicates that already moderate levels (<12 dB) of TTS produced an accelerated hearing loss (PTS) resulting from progressive neural degeneration with age (Kujawa and Liberman 2006, 2009, Maison et al. 2013, Kujawa and Liberman 2015).

The criteria for assessing possible effects of impulsive sounds (such as pile driving or seismic impulses) noise on marine mammals, NMFS (2018), was applied in this study.

A.3.2. Behavioural Response

Numerous studies on marine mammal behavioural responses to sound exposure have not resulted in consensus in the scientific community regarding the appropriate metric for assessing behavioural reactions. However, it is recognised that the context in which the sound is received affects the nature and extent of responses to a stimulus (Southall et al. 2007, Ellison and Frankel 2012, Southall et al. 2016).

For non-impulsive noise, NMFS currently uses step function (all-or-none) threshold of 120 dB re 1 μ Pa SPL (unweighted) to assess and regulate noise-induced behavioural effects for marine mammals (NOAA 2019). The 120 dB re 1 μ Pa threshold is associated with continuous sources and was derived based on studies examining behavioural responses to drilling and dredging (NOAA 2018), referring to Malme et al. (1983), Malme et al. (1984), and Malme et al. (1986), which were considered in , referring to Malme et al. (1983), Malme et al. (1984), and Malme et al. (1986), which were considered in Southall et al. (2007). Malme et al. (1986) found that playback of drillship noise did not produce clear evidence of disturbance or avoidance for levels below 110 dB re 1 μ Pa (SPL), possible avoidance occurred for exposure levels approaching 119 dB re 1 μ Pa. Malme et al. (1984) determined that measurable reactions usually consisted of rather subtle short-term changes in speed and/or heading of the whale(s) under observation. It has been shown that both received level and proximity of the sound source is a contributing factor in eliciting behavioural reactions in humpback whales (Dunlop et al. 2017, Dunlop et al. 2018).

For impulsive noise, NMFS currently uses step function thresholds of 160 dB re 1 μ Pa SPL (unweighted) to assess and regulate noise-induced behavioural effects for marine mammals (NOAA 2018, NOAA 2019). The threshold for impulsive sound is derived from the High-Energy Seismic Survey (HESS) panel (HESS 1999) report that, in turn, is based on the responses of migrating mysticete whales to airgun sounds (Malme et al. 1984). The HESS team recognised that behavioural responses to sound may occur at lower levels, but significant responses were only likely to occur above a SPL of 140 dB re 1 μ Pa. Southall et al. (2007) found varying responses for most marine mammals between a SPL of 140 and 180 dB re 1 μ Pa, consistent with the HESS (1999) report, but lack of convergence in the data prevented them from suggesting explicit step functions.

A.4. Marine Mammal Frequency Weighting

The potential for noise to affect animals depends on how well the animals can hear it. Noises are less likely to disturb or injure an animal if they are at frequencies that the animal cannot hear well. An exception occurs when the sound pressure is so high that it can physically injure an animal by non-auditory means (i.e., barotrauma). For sound levels below such extremes, the importance of sound components at particular frequencies can be scaled by frequency weighting relevant to an animal's sensitivity to those frequencies (Nedwell and Turnpenny 1998, Nedwell et al. 2007).

A.4.1. Marine Mammal Frequency Weighting Functions

In 2015, a US Navy technical report by Finneran (2015) recommended new auditory weighting functions. The overall shape of the auditory weighting functions is similar to human A-weighting functions, which follows the sensitivity of the human ear at low sound levels. The new frequency-weighting function is expressed as:

$$G(f) = K + 10 \log_{10} \left[\left(\frac{(f/f_{lo})^{2a}}{[1 + (f/f_{lo})^2]^a [1 + (f/f_{hi})^2]^b} \right) \right] \quad (\text{A-11})$$

Finneran (2015) proposed five functional hearing groups for marine mammals in water: low-, mid-, and high-frequency cetaceans, phocid pinnipeds, and otariid pinnipeds. The parameters for these frequency-weighting functions were further modified the following year (Finneran 2016) and were adopted in NOAA's technical guidance that assesses noise effects on marine mammals (NMFS 2016, NMFS 2018). Table A-1 lists the frequency-weighting parameters for each hearing group; Figure A-3 shows the resulting frequency-weighting curves.

Table A-1. Parameters for the auditory weighting functions used in this project as recommended by NMFS (2018).

Hearing group	a	b	f_{lo} (Hz)	f_{hi} (kHz)	K (dB)
Low-frequency cetaceans (baleen whales)	1.0	2	200	19,000	0.13
Mid-frequency cetaceans (dolphins, plus toothed, beaked, and bottlenose whales)	1.6	2	8,800	110,000	1.20
High-frequency cetaceans (true porpoises, <i>Kogia</i> , river dolphins, cephalorhynchid, <i>Lagenorhynchus cruciger</i> and <i>L. australis</i>)	1.8	2	12,000	140,000	1.36

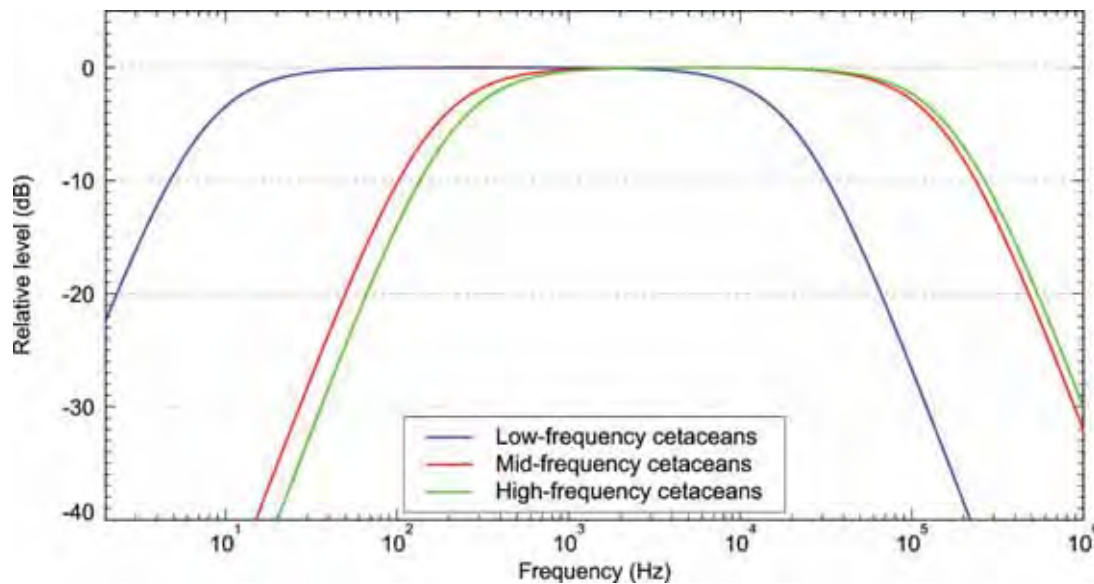


Figure A-3. Auditory weighting functions for functional marine mammal hearing groups used in this project as recommended by NMFS (2018).

A.5. Fish, Fish Eggs, Fish Larvae and Plankton Guidelines

In general, any adverse effects of seismic sound on fish behaviour depends on the species, the state of the individuals exposed, and other factors. We note that, despite mortality being a possibility for fish exposed to airgun sounds, Popper et al. (2014) do not reference an actual occurrence of this effect. Since the publication of that work, newer studies have further examined the question of possible mortality. Popper et al. (2016) adds further information to the possible levels of impulsive seismic airgun sound to which adult fish can be exposed without immediate mortality. They found that the two fish species in their study, with body masses in the range 200–400 g, exposed to a single-impulse of a maximum received level of either 231 dB re 1 μPa (PK) or 205 dB re 1 $\mu\text{Pa}^2\text{-s}$ (SEL), remained alive for 7 days after exposure and that the probability of mortal injury did not differ between exposed and control fish.

In the discussion of the criteria, Popper et al. (2014) discuss the complications in determining a relevant period of mobile seismic surveys, as the received levels at the fish change between impulses because the source is moving, and that in reality a revised guideline based on the closest PK or the per-pulse SEL might be more useful than one based on accumulated SEL. This is because exposures at the closest point of approach (CPA) are the primary exposures contributing to a receiver's accumulated level (Gedamke et al. 2011). Additionally, several important factors determine the likelihood and duration a receiver is expected to be in close proximity to a sound source (i.e., overlap in space and time between the source and receiver). For example, accumulation time for fast moving (relative to the receiver) mobile sources is driven primarily by the characteristics of the source (i.e., speed, duty cycle; NMFS 2016, 2018).

As discussed in Popper (2018), many fish species move around, some over large distances. The author suggests that it is reasonable to think that if the sound of a seismic source becomes too loud, the fish will move away from the source because they are able to determine the direction of a sound source. If the fish moves away, the amount of energy to which it is exposed is likely to be one or a few seismic pulses, and these would not likely be loud enough to result in any effect because the fish would move away at a much lower-level signal than could cause harm. Data on TTS for fish are very limited, with the only study that examined recovery from seismic impulses being Popper et al. (2005). Popper (2018) states that if this study had been conducted on wild, free-swimming fish instead of caged ones, there would have been no effect whatsoever because they were likely to have moved away from the source as it approached them, as would happen with normally free-moving demersal

and pelagic fish species associated with a 3-D seismic survey in northern Australian waters, extrapolating from the Bethany 3-D assessed in Popper (2018).

Therefore, the time over which energy should be accumulated in each individual fish in the survey area should be limited to the time over which fish receives the maximum exposure, and 24 h is likely too long a period for calculating the accumulation of energy in determining potential harm (e.g., damage or TTS) (Popper 2018). Even if fish do show some TTS, recovery will start as soon as the most intense sounds end, and recovery is likely to even occur, to a limited degree, between seismic pulses. Based on very limited data, recovery within 24 h (or less) is very likely. If TTS does occur, the duration of exposure to the most intense sounds that could result in TTS will be over just a few hours. Thus, energy accumulating over longer periods than a few hours is probably inappropriate (Popper 2018).

Appendix B. Models

B.1. Acoustic Source Model

The source levels and directivity of the seismic source were predicted with JASCO's Airgun Array Source Model (AASM). AASM includes low- and high-frequency modules for predicting different components of the seismic source spectrum. The low-frequency module is based on the physics of oscillation and radiation of airgun bubbles, as originally described by Ziolkowski (1970), that solves the set of parallel differential equations that govern bubble oscillations. Physical effects accounted for in the simulation include pressure interactions between airguns, port throttling, bubble damping, and generator-injector (GI) gun behaviour discussed by Dragoset (1984), Laws et al. (1990), and Landrø (1992). A global optimisation algorithm tunes free parameters in the model to a large library of airgun source signatures.

While airgun signatures are highly repeatable at the low frequencies, which are used for seismic imaging, their sound emissions have a large random component at higher frequencies that cannot be predicted using a deterministic model. Therefore, AASM uses a stochastic simulation to predict the high-frequency (800–25,000 Hz) sound emissions of individual airguns, using a data-driven multiple-regression model. The multiple-regression model is based on a statistical analysis of a large collection of high quality seismic source signature data recently obtained from the Joint Industry Program (JIP) on Sound and Marine Life (Mattsson and Jenkerson 2008). The stochastic model uses a Monte-Carlo simulation to simulate the random component of the high-frequency spectrum of each airgun in an array. The mean high-frequency spectra from the stochastic model augment the low-frequency signatures from the physical model, allowing AASM to predict airgun source levels at frequencies up to 25,000 Hz.

AASM produces a set of “notional” signatures for each array element based on:

- Array layout
- Volume, tow depth, and firing pressure of each airgun
- Interactions between different airguns in the array

These notional signatures are the pressure waveforms of the individual airguns at a standard reference distance of 1 m; they account for the interactions with the other airguns in the array. The signatures are summed with the appropriate phase delays to obtain the far-field source signature of the entire array in all directions. This far-field array signature is filtered into decade frequency bands to compute the source levels of the array as a function of frequency band and azimuthal angle in the horizontal plane (at the source depth), after which it is considered a directional point source in the far field.

A seismic array consists of many sources and the point source assumption is invalid in the near field where the array elements add incoherently. The maximum extent of the near field of an array (R_{nf}) is:

$$R_{nf} < \frac{l^2}{4\lambda} \quad (\text{B-1})$$

where λ is the sound wavelength and l is the longest dimension of the array (Lurton 2002, §5.2.4). For example, a seismic source length of $l = 21$ m yields a near-field range of 147 m at 2 kHz and 7 m at 100 Hz. Beyond this R_{nf} range, the array is assumed to radiate like a directional point source and is treated as such for propagation modelling.

The interactions between individual elements of the array create directionality in the overall acoustic emission. Generally, this directionality is prominent mainly at frequencies in the mid-range between tens of hertz to several hundred hertz. At lower frequencies, with acoustic wavelengths much larger than the inter-airgun separation distances, the directionality is small. At higher frequencies, the pattern of lobes is too finely spaced to be resolved and the effective directivity is less.

B.2. Sound Propagation Models

B.2.1. MONM-BELLHOP

Long-range sound fields were computed using JASCO's Marine Operations Noise Model (MONM). Compared to VSTACK, MONM less accurately predicts steep-angle propagation for environments with higher shear speed but is well suited for effective longer-range estimation. This model computes sound propagation at frequencies of 5 Hz to 2 kHz via a wide-angle parabolic equation solution to the acoustic wave equation (Collins 1993) based on a version of the US Naval Research Laboratory's Range-dependent Acoustic Model (RAM), which has been modified to account for a solid seabed (Zhang and Tindle 1995). MONM computes sound propagation at frequencies > 2 kHz via the BELLHOP Gaussian beam acoustic ray-trace model (Porter and Liu 1994).

The parabolic equation method has been extensively benchmarked and is widely employed in the underwater acoustics community (Collins et al. 1996). MONM accounts for the additional reflection loss at the seabed, which results from partial conversion of incident compressional waves to shear waves at the seabed and sub-bottom interfaces, and it includes wave attenuations in all layers. MONM incorporates the following site-specific environmental properties: a bathymetric grid of the modelled area, underwater sound speed as a function of depth, and a geoacoustic profile based on the overall stratified composition of the seafloor.

MONM computes acoustic fields in three dimensions by modelling transmission loss within two-dimensional (2-D) vertical planes aligned along radials covering a 360° swath from the source, an approach commonly referred to as $N \times 2$ -D. These vertical radial planes are separated by an angular step size of $\Delta\theta$, yielding $N = 360^\circ/\Delta\theta$ number of planes (Figure B-1).

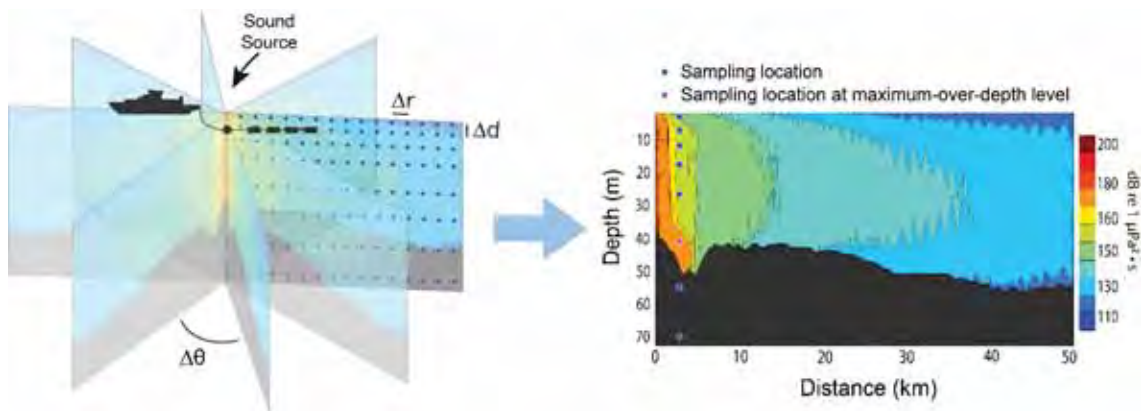


Figure B-1. The $N \times 2$ -D and maximum-over-depth modelling approach used by MONM.

MONM treats frequency dependence by computing acoustic transmission loss at the centre frequencies of decade bands. Sufficiently many frequency bands, starting at 5 Hz, are modelled to include most of the acoustic energy emitted by the source. At each centre frequency, the transmission loss is modelled within each of the N vertical planes as a function of depth and distance from the source. The decade-band received per-pulse SEL are computed by subtracting the band transmission loss values from the directional source level in that frequency band. Composite broadband received per-pulse SEL are then computed by summing the received decade-band levels.

The received per-pulse SEL sound field within each vertical radial plane is sampled at various radial distances from the source, generally with a fixed radial step size. At each sampling range along the surface, the sound field is sampled at various depths, with the step size between samples increasing with depth below the surface. The step sizes are chosen to provide increased coverage near the depth of the source and at depths of interest in terms of the sound speed profile. For areas with deep water, sampling is not performed at depths beyond those reachable by marine mammals. The received per-pulse SEL at a surface sampling location is taken as the maximum value that occurs

over all samples within the water column, i.e., the maximum-over-depth received per-pulse SEL. These maximum-over-depth per-pulse SEL are presented as colour contours around the source.

B.2.2. Full Waveform Range-dependent Acoustic Model: FWRAM

For impulsive sounds from the seismic source, time-domain representations of the pressure waves generated in the water are required to calculate SPL and PK. Furthermore, the seismic source must be represented as a distributed source to accurately characterise vertical directivity effects in the near-field zone. For this study, synthetic pressure waveforms were computed using FWRAM, which is a time-domain acoustic model based on the same wide-angle parabolic equation (PE) algorithm as MONM. FWRAM computes synthetic pressure waveforms versus range and depth for range-varying marine acoustic environments, and it takes the same environmental inputs as MONM (bathymetry, water sound speed profile, and seafloor geoacoustic profile). Unlike MONM, FWRAM computes pressure waveforms via Fourier synthesis of the modelled acoustic transfer function in closely spaced frequency bands. FWRAM employs the array starter method to accurately model sound propagation from a spatially distributed source (MacGillivray and Chapman 2012).

Besides providing direct calculations of the PK and SPL, the synthetic waveforms from FWRAM can also be used to convert the SEL values from MONM to SPL.

B.3. Model Validation Information

Predictions from JASCO's Airgun Array Source Model (AASM) and propagation models (MONM, FWRAM and VSTACK) have been validated against experimental data from a number of underwater acoustic measurement programs conducted by JASCO globally, including the United States and Canadian Arctic, Canadian and southern United States waters, Greenland, Russia and Australia (Hannay and Racca 2005, Aerts et al. 2008, Funk et al. 2008, Ireland et al. 2009, O'Neill et al. 2010, Warner et al. 2010, Racca et al. 2012a, Racca et al. 2012b, Matthews and MacGillivray 2013, Martin et al. 2015, Racca et al. 2015, Martin et al. 2017a, Martin et al. 2017b, Warner et al. 2017, MacGillivray 2018, McPherson et al. 2018, McPherson and Martin 2018).

In addition, JASCO has conducted measurement programs associated with a significant number of anthropogenic activities which have included internal validation of the modelling (including McCrodon et al. 2011, Austin and Warner 2012, McPherson and Warner 2012, Austin and Bailey 2013, Austin et al. 2013, Zykov and MacDonnell 2013, Austin 2014, Austin et al. 2015, Austin and Li 2016, Martin and Popper 2016).

B.4. Animal Movement and Exposure Modelling

Animal movement and exposure modelling considers the movement of both sound sources (if mobile) and animals over time. Acoustic source and propagation modelling are used to generate 3-D sound fields that vary as a function of distance to source, depth, and azimuth. Sound sources are modelled at representative sites and the resulting sound fields are assigned to source locations using the minimum Euclidean distance. The sound received by an animal at any given time depends on its location relative to the source. Because the true locations of the animals within the sound fields are unknown, realistic animal movements are simulated using repeated random sampling of various behavioural parameters. The Monte Carlo method of simulating many animals within the operations area is used to estimate the sound exposure history of the population of simulated animals (animats).

Monte Carlo methods provide a heuristic approach for determining the probability distribution function (PDF) of complex situations, such as animals moving in a sound field. The probability of an event's occurrence is determined by the frequency with which it occurs in the simulation. The greater the number of random samples, in this case the more simulated animats, the better the approximation of the PDF. Animats are randomly placed, or seeded, within the simulation boundary at a specified density (animats/km²). Higher densities provide a finer PDF estimate resolution but require more computational resources. To ensure good representation of the PDF, the animat density is set as high as practical allowing for computation time. The animat density is much higher than the real-world

density to ensure good representation of the PDF. The resulting PDF is scaled using the real-world density.

Several models for marine mammal movement have been developed (Ellison et al. 1987, Frankel et al. 2002, Houser 2006). These models use an underlying Markov chain to transition from one state to another based on probabilities determined from measured swimming behaviour. The parameters may represent simple states, such as the speed or heading of the animal, or complex states, such as likelihood of participating in foraging, play, rest, or travel. Attractions and aversions to variables like anthropogenic sounds and different depth ranges can be included in the models.

The JASCO Animal Simulation Model Including Noise Exposure (JASMINE) was based on the open-source marine mammal movement and behaviour model (3MB, Houser 2006) and used to predict the exposure of animats to sound arising from the anthropogenic activities. Animats are programmed to behave like the species likely to be present in the survey area. The parameters used for forecasting realistic behaviours (e.g., diving, foraging, aversion, surface times, etc.) are determined and interpreted from marine species studies (e.g., tagging studies) where available, or reasonably extrapolated from related species. An individual animat's modelled sound exposure levels are summed over the total simulation duration to determine its total received energy, and then compared to the assumed threshold criteria.

JASMINE uses the same animal movement algorithms as 3MB (Houser, 2006), but has been extended to be directly compatible with JASCO's Marine Operations Noise Model (MONM) and Full Waveform Range-dependent Acoustic Model acoustic field predictions, for inclusion of source tracks, and importantly for animats to change behavioural states based on time and space dependent modelled variables such as received levels for aversion behaviour, although aversion was not considered in this study.

B.4.1. Animal Movement Parameters

JASMINE uses previously measured behaviour to forecast behaviour in new situations and locations. The parameters used for forecasting realistic behaviour are determined (and interpreted) from marine species studies (e.g., tagging studies). Each parameter in the model is described as a probability distribution. When limited or no information is available for a species parameter, a Gaussian or uniform distribution may be chosen for that parameter. For the Gaussian distribution, the user determines the mean and standard deviation of the distribution from which parameter values are drawn. For the uniform distribution, the user determines the maximum and minimum distribution from which parameter values are drawn. When detailed information about the movement and behaviour of a species are available, a user-created distribution vector, including cumulative transition probabilities, may be used (referred to here as a vector model; Houser 2006). Different sets of parameters can be defined for different behaviour states. The probability of an animat starting out in or transitioning into a given behaviour state can in turn be defined in terms of the animat's current behavioural state, depth, and the time of day. In addition, each travel parameter and behavioural state has a termination function that governs how long the parameter value or overall behavioural state persists in simulation.

The parameters used in JASMINE describe animal movement in both the vertical and horizontal planes. The parameters relating to travel in these two planes are briefly described below.

Travel sub-models

- **Direction**— determines an animat's choice of direction in the horizontal plane. Sub-models are available for determining the heading of animats, allowing for movement to range from strongly biased to undirected. A random walk model can be used for behaviours with no directional preference, such as feeding and playing. In a random walk, all bearings are equally likely at each parameter transition time step. A correlated random walk can be used to smooth the changes in bearing by using the current heading as the mean of the distribution from which to draw the next heading. An additional variant of the correlated random walk is available that includes a directional bias for use in situations where animals have a preferred absolute direction, such as migration. A user-defined vector of directional probabilities can also be input to control animat heading. For more detailed discussion of these parameters, see Houser (2006) and Houser and Cross (1999).

- **Travel rate**—defines an animat's rate of travel in the horizontal plane. When combined with vertical speed and dive depth, the dive profile of the animat is produced.

Dive sub-models

- **Ascent rate**—defines an animat's rate of travel in the vertical plane during the ascent portion of a dive.
- **Descent rate**—defines an animat's rate of travel in the vertical plane during the descent portion of a dive.
- **Depth**—defines an animat's maximum dive depth.
- **Reversals**—determines whether multiple vertical excursions occur once an animat reaches the maximum dive depth. This behaviour is used to emulate the foraging behaviour of some marine mammal species at depth. Reversal-specific ascent and descent rates may be specified.
- **Surface interval**—determines the duration an animat spends at, or near, the surface before diving again.

B.4.2. Exposure Integration Time

The interval over which acoustic exposure (L_E) should be integrated and maximal exposure (L_p) determined is not well defined. Both Southall et al. (2007) and the NMFS (2018) recommend a 24 h baseline accumulation period, but state that there may be situations where this is not appropriate (e.g., a high-level source and confined population). Resetting the integration after 24 h can lead to overestimating the number of individual animals exposed because individuals can be counted multiple times during an operation. The type of animal movement engine used in this study simulates realistic movement using swimming behaviour collected over relatively short periods (hours to days) and does not include large-scale movement such as migratory circulation patterns. For this study, 7 days were modelled, with results for the full period and also scaled down to 24 h.

Ideally, a simulation area is large enough to encompass the entire range of a population so that any animal that could approach the source during an operation is included. However, there are limits to the simulation area, and computational overhead increases with area. For practical reasons, the simulation area is limited. In the simulation, every animat that reaches a border is replaced by another animat entering at the opposing border—e.g., an animat crossing the northern border of the simulation is replaced by one entering the southern border at the same longitude. When this action places the animat in an inappropriate water depth, the animat is randomly placed on the map at a depth suited to its species definition. The exposures of all animats (including those leaving the simulation and those entering) are kept for analysis. This approach maintains a consistent animat density and allows for longer integration periods with finite simulation areas.

B.4.3. Seeding Density and Scaling

The exposure criteria for continuous sounds were used to determine the number of animats exceeding exposure thresholds. To generate statistically reliable probability density functions, all simulations were seeded with an animat density of 2 animat/km² over the entire simulation area.

Appendix C. Methods and Parameters

This section describes the specifications of the seismic source that was used at all sites and the environmental parameters used in the propagation models.

C.1. Estimating Distance to Threshold Levels

Sound level contours were calculated based on the underwater sound fields predicted by the propagation models, sampled by taking the maximum value over all modelled depths above the sea floor for each location in the modelled region. The predicted distances to specific levels were computed from these contours. Two distances relative to the source are reported for each sound level: 1) R_{\max} , the maximum range to the given sound level over all azimuths, and 2) $R_{95\%}$, the range to the given sound level after the 5% farthest points were excluded (see examples in Figure C-1).

The $R_{95\%}$ is used because sound field footprints are often irregular in shape. In some cases, a sound level contour might have small protrusions or anomalous isolated fringes. This is demonstrated in the image in Figure C-1(a). In cases such as this, where relatively few points are excluded in any given direction, R_{\max} can misrepresent the area of the region exposed to such effects, and $R_{95\%}$ is considered more representative. In strongly asymmetric cases such as shown in Figure C-1(b), on the other hand, $R_{95\%}$ neglects to account for significant protrusions in the footprint. In such cases R_{\max} might better represent the region of effect in specific directions. Cases such as this are usually associated with bathymetric features affecting propagation. The difference between R_{\max} and $R_{95\%}$ depends on the source directivity and the non-uniformity of the acoustic environment.

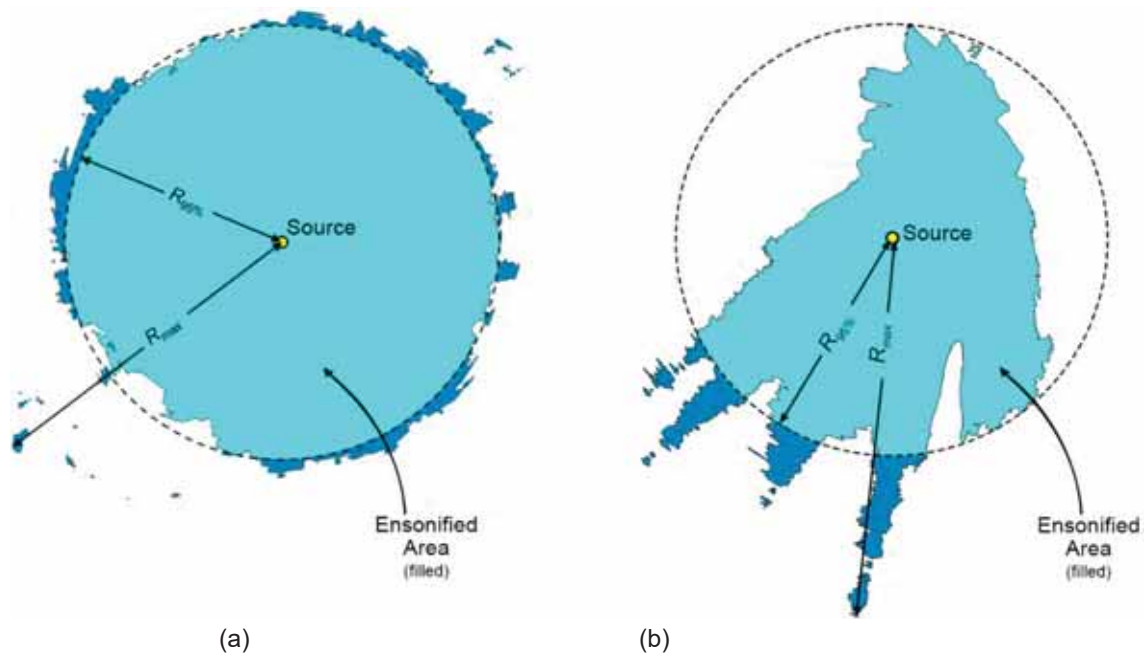


Figure C-1. Sample areas ensonified to an arbitrary sound level with R_{\max} and $R_{95\%}$ ranges shown for two different scenarios. (a) Largely symmetric sound level contour with small protrusions. (b) Strongly asymmetric sound level contour with long protrusions. Light blue indicates the ensonified areas bounded by $R_{95\%}$; darker blue indicates the areas outside this boundary which determine R_{\max} .

C.2. Estimating SPL from Modelled SEL Results

The per-pulse SEL of sound pulses is an energy-like metric related to the dose of sound received over a pulse's entire duration. The pulse SPL on the other hand, is related to its intensity over a specified time interval. Seismic pulses typically lengthen in duration as they propagate away from their source, due to seafloor and surface reflections, and other waveguide dispersion effects. The changes in pulse length, and therefore the time window considered, affect the numeric relationship between SPL and SEL. This study has applied a fixed window duration to calculate SPL ($T_{\text{fix}} = 125$ ms; see Appendix A.1), as implemented in Martin et al. (2017b). Full-waveform modelling was used to estimate SPL, but this type of modelling is computationally intensive, and can be prohibitively time consuming when run at high spatial resolution over large areas.

For the current study, FWRAM (Appendix B.2.2) was used to model synthetic seismic pulses over the frequency range 5–1024 Hz. This was performed along all broadside and endfire radials at one site due to the relatively constant and similar water depths throughout the survey area. FWRAM uses Fourier synthesis to recreate the signal in the time domain so that both the SEL and SPL from the source can be calculated. The differences between the SEL and SPL were extracted for all ranges and depths that corresponded to those generated from the high spatial-resolution results from MONM. A 125 ms fixed time window positioned to maximize the SPL over the pulse duration was applied. The resulting SEL -to-SPL offsets were averaged in 20 m range bins along each modelled radial and depth, and the 90th percentile was selected at each range to generate a generalised range-dependent conversion function for each site. The range-dependent conversion function was averaged between the two sites and applied to predicted per-pulse SEL results from MONM to model SPL values. Figure C-2 show the conversion offsets for Site 2; the spatial variation is caused by changes in the received airgun pulse as it propagates from the source.

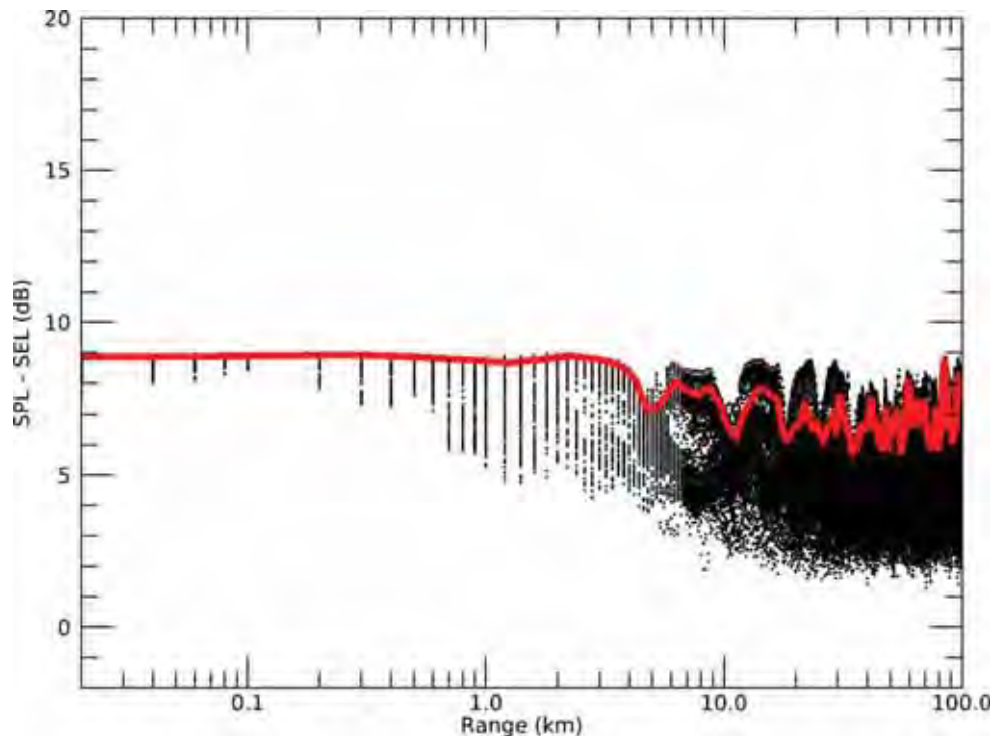


Figure C-2. *Site 2*: Range-and-depth-dependent conversion offsets for converting SEL to SPL for seismic pulses. Slices are shown for the 3150 in³ seismic source. Black lines are the modelled differences between SEL and SPL across different radials and receiver depths; the solid red line is the 90th percentile of the modelled differences at each range.

C.3. Accumulated SEL Calculation

When there are many seismic pulses, it becomes computationally prohibitive to perform sound propagation modelling for every single event. The distance between the consecutive seismic impulses is small enough, however, that the environmental parameters that influence sound propagation are virtually the same for many impulse points. The acoustic fields can, therefore, be modelled for a subset of seismic pulses and estimated at several adjacent ones. After sound fields from representative impulse locations are calculated, they are adjusted to account for the source position for nearby impulses.

Although estimating the cumulative sound field with the described approach is not as precise as modelling sound propagation at every impulse location, small-scale, site-specific sound propagation features tend to blur and become less relevant when sound fields from adjacent impulses are summed. Larger scale sound propagation features, primarily dependent on water depth, dominate the cumulative field. The accuracy of the present method acceptably reflects those large-scale features, thus providing a meaningful estimate of a wide area SEL field in a computationally feasible framework.

To produce the map of accumulated received sound level distributions and calculate distances to specified sound level thresholds, the maximum-over-depth level was calculated at each sampling point within the modelled region. The radial grids of maximum-over-depth sound levels for each impulse were then resampled (by linear triangulation) to produce a regular Cartesian grid. The sound field grids from all impulses were summed (Equation A-5) to produce the cumulative sound field grid with cell sizes of 20 m. The contours and threshold ranges were calculated from these flat Cartesian projections of the modelled acoustic fields. The single-impulse SEL fields were computed over model grids approximately 100 × 100 km in range, which encompasses the full area of the cumulative grid (the entire survey area).

The unweighted (fish) and frequency-weighted (mammals and sea turtles) SEL_{24h} results were rendered as contour maps, including contours that focus on the relevant criteria-based thresholds. Only contours at ranges larger than the nearfield of the seismic source were rendered.

C.4. Environmental Parameters

C.4.1. Bathymetry

Water depths throughout the modelled area were extracted from the Australian Bathymetry and Topography Grid, a 9 arc-second grid rendered for Australian waters (Whiteway 2009) for the region shown in Figure C-3. Bathymetry data were extracted and re-gridded onto a Universal Transverse Mercator (UTM) coordinate projection (Zone 50) with a regular grid spacing of 100 × 100 m to generate the bathymetry in Figure C-3 (note the data is re-projected or the display in the Map Grid of Australia (MGA) coordinate system).

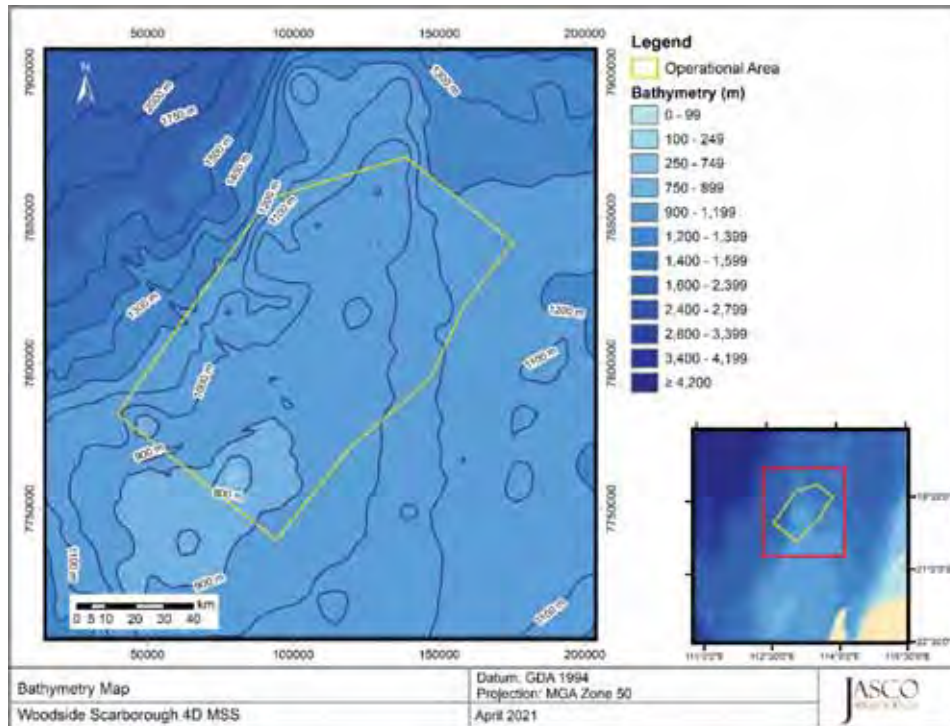


Figure C-3. Map of the modelling area presenting the variation in water depth.

C.4.2. Sound Speed Profile

The sound speed profiles for the modelled sites were derived from temperature and salinity profiles from the US Naval Oceanographic Office's Generalized Digital Environmental Model V 3.0 (GDEM; Teague et al. 1990, Carnes 2009). GDEM provides an ocean climatology of temperature and salinity for the world's oceans on a latitude-longitude grid with 0.25° resolution, with a temporal resolution of one month, based on global historical observations from the US Navy's Master Oceanographic Observational Data Set (MOODS). The climatology profiles include 78 fixed depth points to a maximum depth of 6800 m (where the ocean is that deep). The GDEM temperature-salinity profiles were converted to sound speed profiles according to Coppens (1981).

A mean sound speed profile for August (representative of potential operational period, January to April or July to October) was derived from the GDEM profiles within a 100 km box radius encompassing all modelling sites. The sound speed profile in August is expected to be most favourable to longer-range sound propagation during the proposed survey time frame due to a slight upward refracting profile in the upper 50 m. As such, August was selected for sound propagation modelling to ensure precautionary estimates of distances to received sound level thresholds. Figure C-4 shows the resulting profile used as input to the sound propagation modelling.

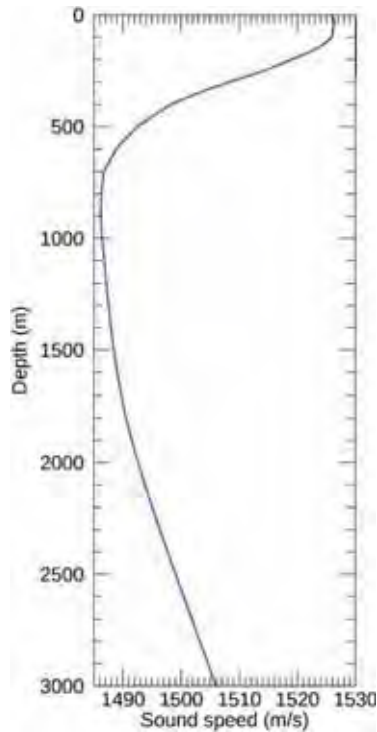


Figure C-4. Monthly averaged sound speed profile for August. The profile for August was used in modelling all sound fields. All profiles were calculated from temperature and salinity profiles from GDEM V 3.0 (GDEM; Teague et al. 1990, Carnes 2009).

C.4.3. Geoacoustics

Deep core samples (Exon and Willcox 1980) show the presence of a thick package of pelagic sediments below the seafloor that is bounded by sedimentary bedrock at a depth of ~2000 m. Table C-1 shows the derived geoacoustic profile that was based on geologic information and descriptions from core samples, generic properties for carbonate sediments and calcarenite from Hamilton (1980) and Duncan et al. (2013).

Table C-1. Geoacoustic profile for the Sites 1–2. Within each depth range, each parameter varies linearly within the stated range. The compressional wave is the primary wave and the shear wave is the secondary wave.

Depth below seafloor (m)	Material	Density (g/cm ³)	Compressional wave		Shear wave	
			Speed (m/s)	Attenuation (dB/λ)	Speed (m/s)	Attenuation (dB/λ)
0–30	Foraminifera/nannofossil ooze, calcisiltit	1.52–1.56	1560–1600	0.12–0.13	250	3.65
30–100		1.56–1.65	1600–1700	0.13–0.15		
100–2000	Calcarenite/calcisiltit	1.90–2.20	2100–2600	0.25–0.52		
>2000	Sedimentary bedrock	2.54	3500	0.11		

C.5. Seismic Sources

The layout of the 3150 in³ seismic source used for modelling in this study is provided in Figure C-5. Details of the airgun parameters are provided in Table C-2.

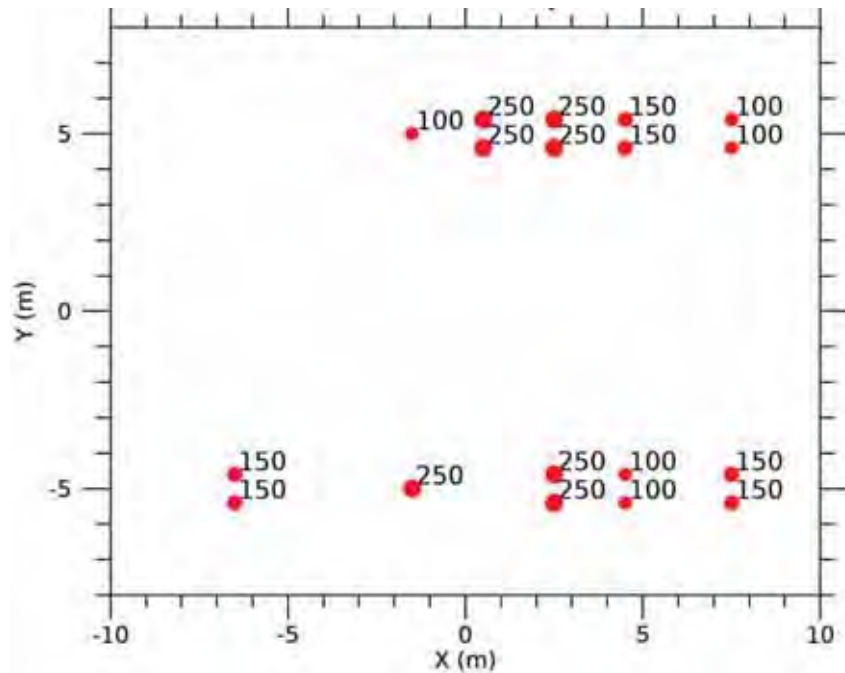


Figure C-5. Layout of the modelled 3150 in³ array. Tow depth is 7 m. The labels indicate the firing volume (in cubic inches) for each airgun. Also see Table C-2.

Table C-2. Layout of the modelled 3150 in³ array. Tow depth is 7 m. Firing pressure for all guns is 2000 psi. Also see Figure C-5.

String	Gun	x (m)	y (m)	z (m)	Vol (in ³)	String	Gun	x (m)	y (m)	z (m)	Vol (in ³)
1	1	7.5	-5.4	7	150	2	12	7.5	4.6	7	100
	2	7.5	-4.6	7	150		13	7.5	5.4	7	100
	3	4.5	-5.4	7	100		14	4.5	4.6	7	150
	4	4.5	-4.6	7	100		15	4.5	5.4	7	150
	5	2.5	-5.4	7	250		16	2.5	4.6	7	250
	6	2.5	-4.6	7	250		17	2.5	5.4	7	250
	8	-1.5	-5	7	250		18	0.5	4.6	7	250
	10	-6.5	-5.4	7	150		19	0.5	5.4	7	250
11	-6.5	-4.6	7	150	20	-1.5	5	7	100		

C.5.1. Array Source Levels and Directivity

Figure C-6 shows the broadside (perpendicular to the tow direction), endfire (parallel to the tow direction) and vertical overpressure signature and corresponding power spectrum levels for the 3150 in³ array. Horizontal deciband source levels are shown as a function of band centre frequency and azimuth (Figure C-7).

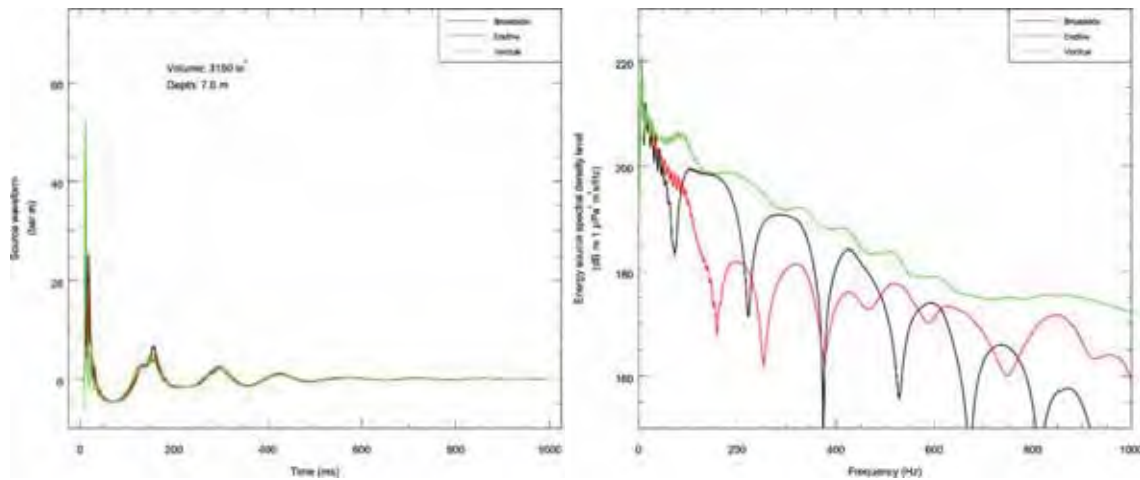


Figure C-6. Predicted source level details for the 3150 in³ array at 7 m towed depth. (Left) the overpressure signature and (right) the power spectrum for in-plane horizontal (broadside), perpendicular (endfire), and vertical directions (no surface ghost).

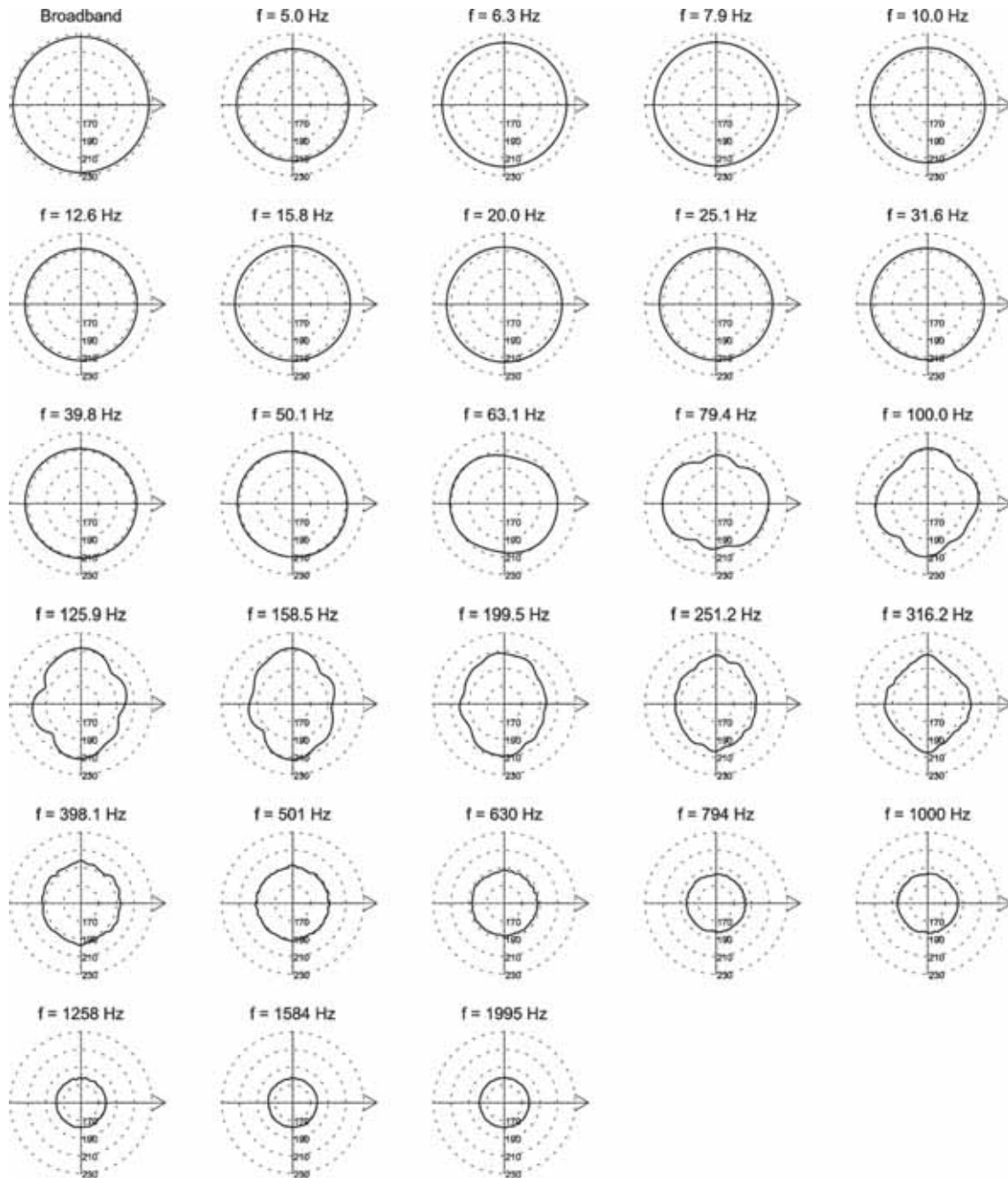


Figure C-7. Directionality of the predicted horizontal source levels for the 3150 in³ seismic source, 5 Hz to 2 kHz. Source levels (in dB re 1 $\mu\text{Pa}^2 \cdot \text{s m}^2$) are shown as a function of azimuth for the centre frequencies of the decade bands modelled; frequencies are shown above the plots. The perpendicular direction to the frame is to the right. Tow depth is 7 m (see Figure C-6).

Appendix D. Per-Pulse SEL Sound Field Maps

Per-pulse SEL maps for both modelled sites are provided in Figures D-1 through D-4.

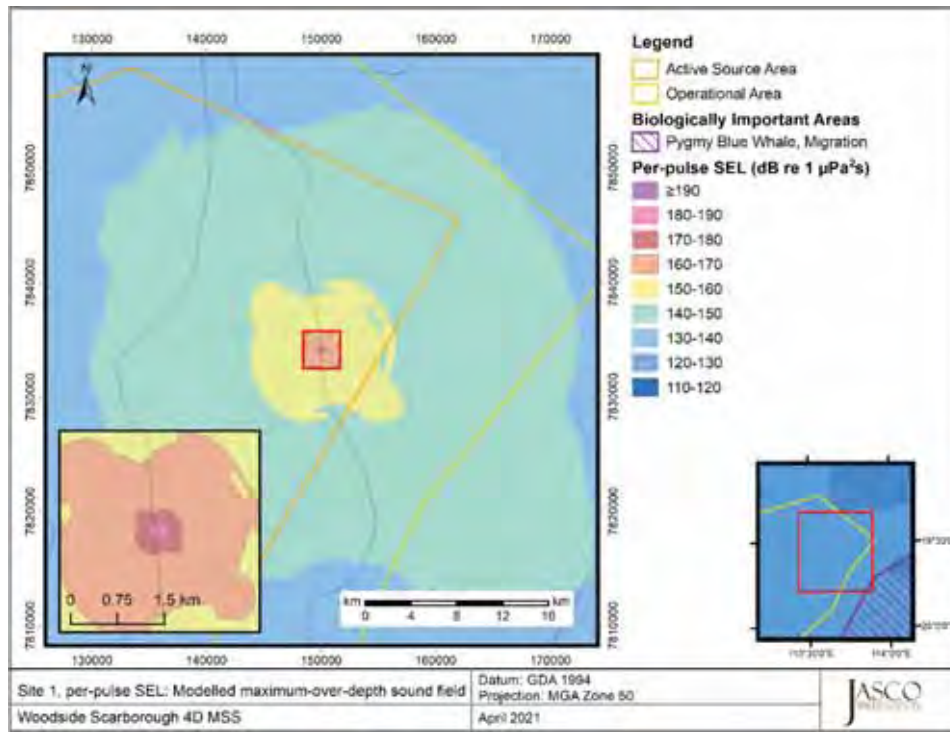


Figure D-1. Site 1, tow azimuth 40°, per-pulse SEL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps.

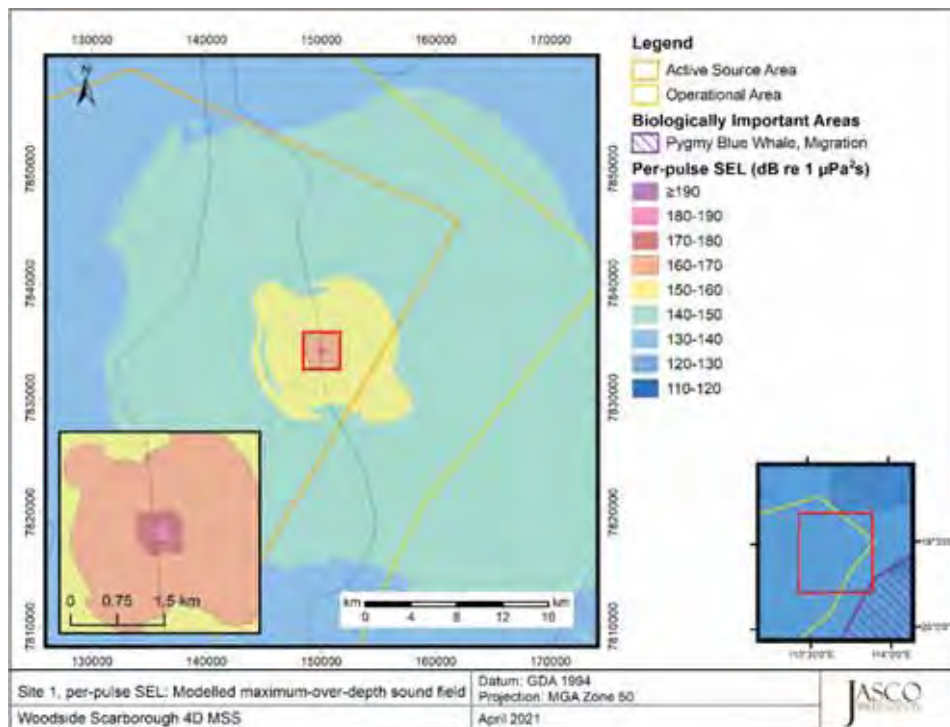


Figure D-2. Site 1, tow azimuth 220°, per-pulse SEL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps.

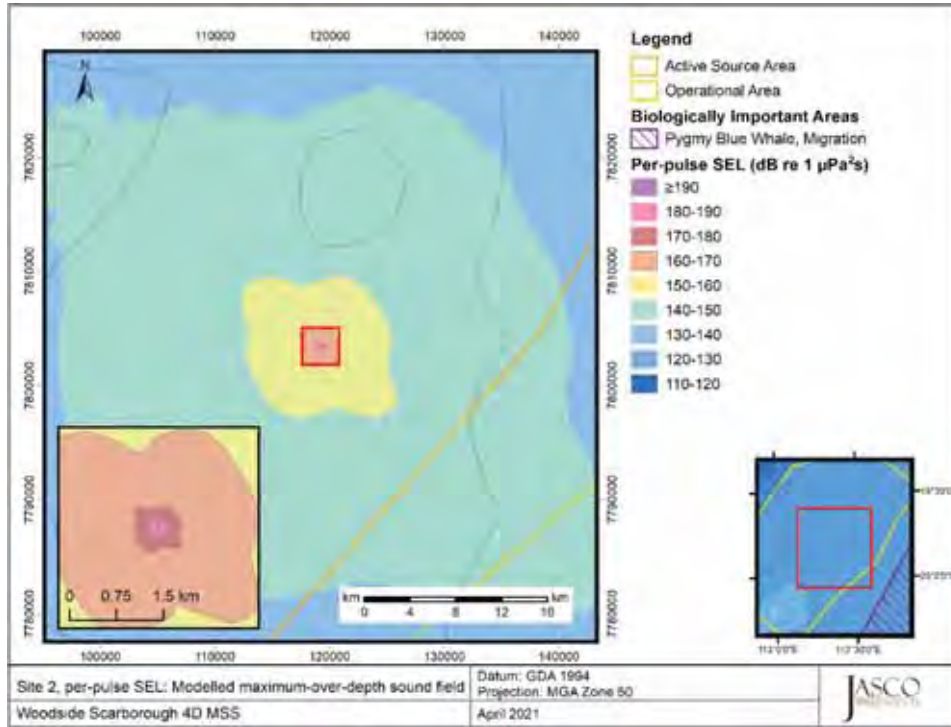


Figure D-3. Site 2, tow azimuth 40°, per-pulse SEL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps.

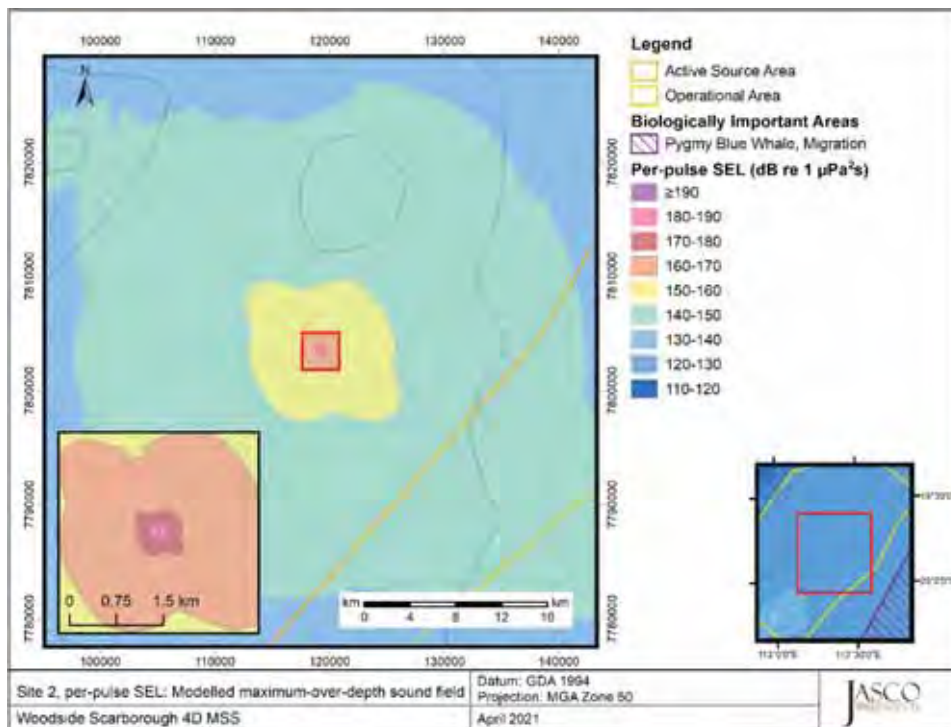


Figure D-4. Site 2, tow azimuth 220°, per-pulse SEL: Sound level contour map showing the unweighted maximum-over-depth sound field in 10 dB steps.

Appendix E. Animal Movement Exposure Radial Distances

The JASMINE simulation restricted the spatial distribution of animals to the adjacent migration BIA, which resulted in zero exposures above threshold for any of the assessed criteria (see Section 5.4). To provide context, a second simulation was run that did not limit the distribution of the animals to the BIA. A summary of the resulting exposure ranges is included in Table E-1. Results include ER_{95%} and ER_{max} exposure ranges calculated for the 160 dB behavioural response threshold and PK and SEL thresholds for both TTS and PTS. Figures E-1 through E-5 show histograms of animal CPA ranges for each of the assessed threshold criteria.

Table E-1. Summary of animal simulation results for migrating pygmy blue whales. The 95th percentile exposure ranges (ER_{95%}) and maximum exposure ranges (ER_{max}) in km and probability of animals being exposed above threshold within the ER_{95%} and ER_{max} are provided.

Threshold		Maximum acoustic radial distance to threshold (km)	ER _{95%}		ER _{max}		
Description	Threshold level (dB)		Distance (km)	Probability of exposure (%)	Distance (km)	Probability of exposure (%)	
TTS	PK	213 ^a	0.06	0.05	88	0.06	84
	SEL _{24h}	168 ^b	60.7	15.02	42	21.73	32
PTS	PK	219 ^a	0.03	0.04	73	0.04	71
	SEL _{24h}	183 ^c	0.38	0.06	80	0.13	65
Behavioural response		160 ^c	7.28	6.54	71	7.33	67

^a PK (L_{pk} ; dB re 1 μ Pa)

^b LF-weighted SEL_{24h} ($L_{E,24h}$; dB re 1 μ Pa²·s)

^c SPL (L_p ; dB re 1 μ Pa)

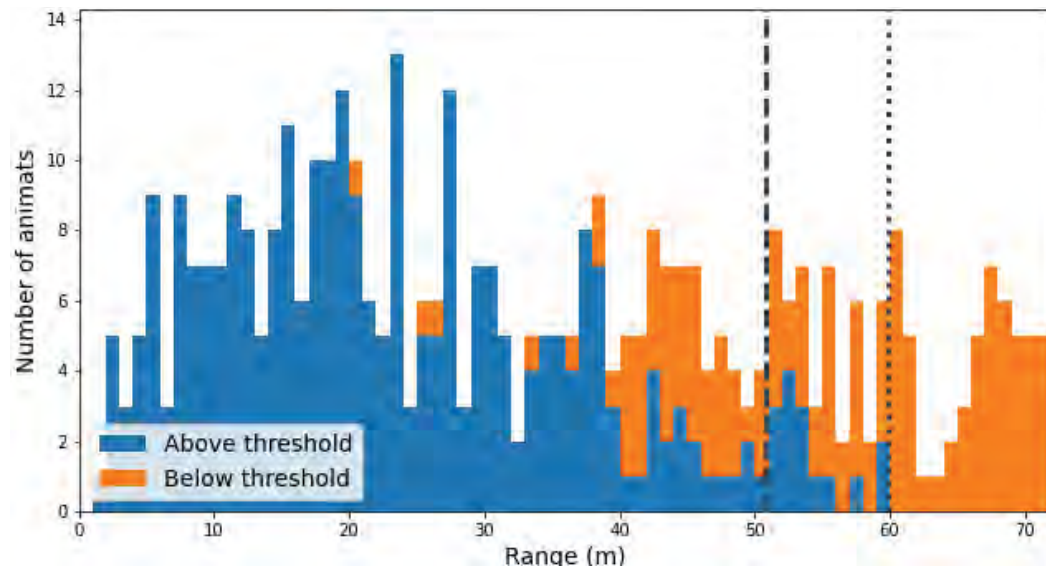


Figure E-1. Histograms of the distribution of CPA ranges for animals exposed above and below TTS PK threshold criteria for migrating pygmy blue whales. The TTS PK ER_{95%} and ER_{max} are indicated by vertical dashed lines.

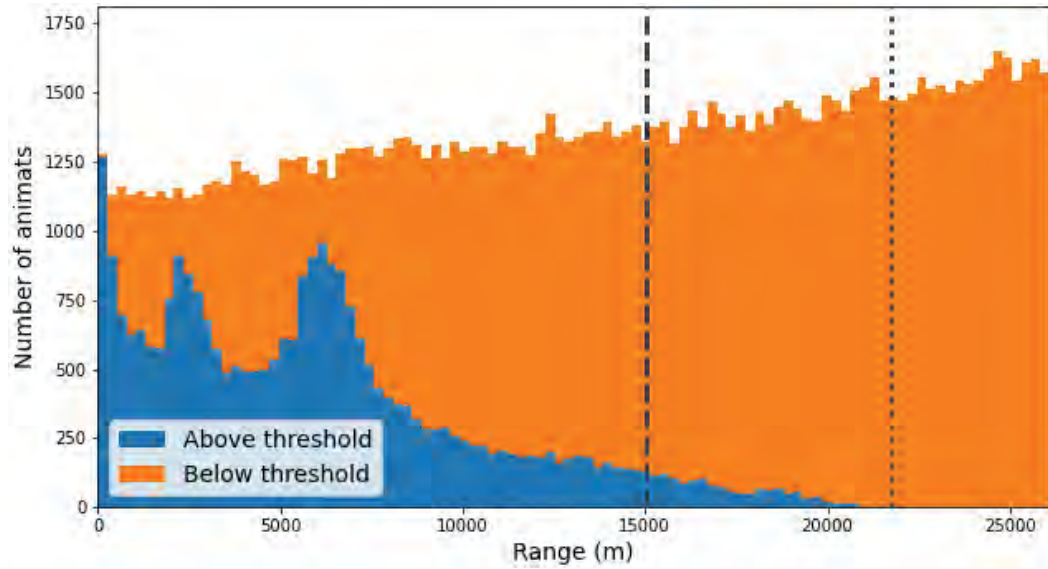


Figure E-2. Histograms of the distribution of CPA ranges for animals exposed above and below TTS SEL_{24h} threshold criteria for migrating pygmy blue whales. The TTS SEL_{24h} ER_{95%} and ER_{max} are indicated by vertical dashed lines.

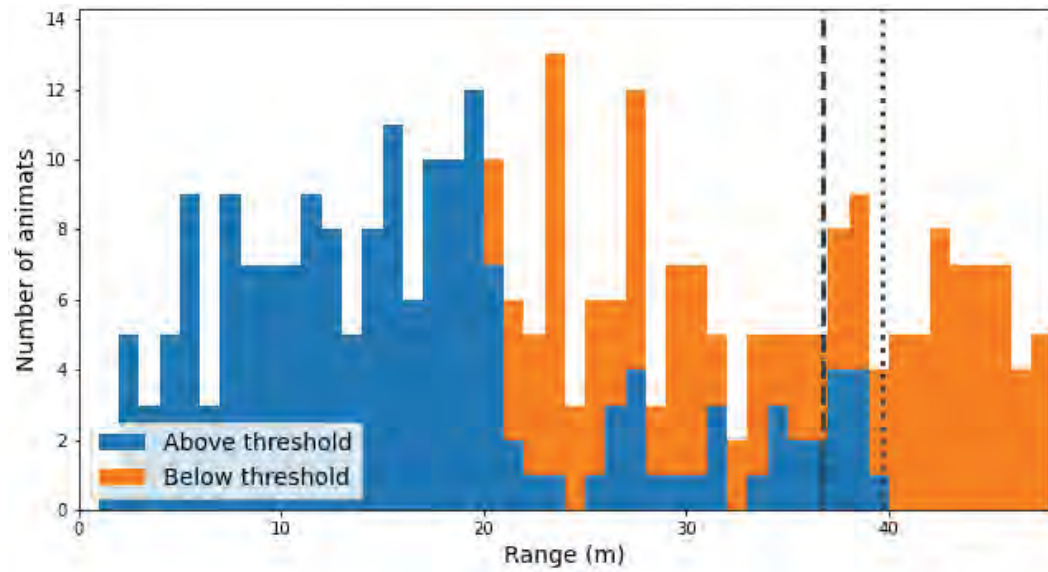


Figure E-3. Histograms of the distribution of CPA ranges for animals exposed above and below PTS PK threshold criteria for migrating pygmy blue whales. The PTS PK ER_{95%} and ER_{max} are indicated by vertical dashed lines.

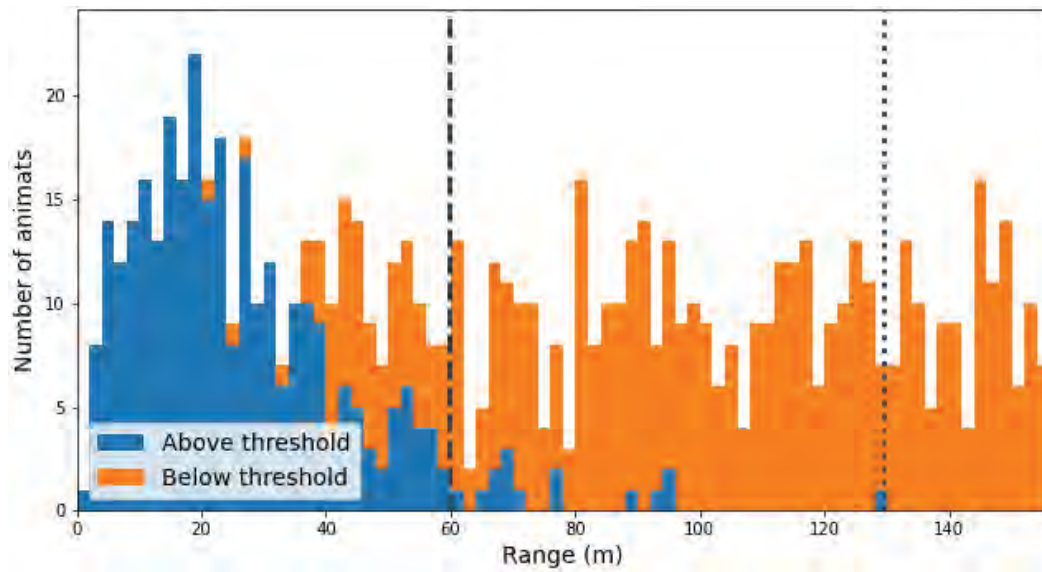


Figure E-4. Histograms of the distribution of CPA ranges for animals exposed above and below PTS SEL_{24h} threshold criteria for migrating pygmy blue whales. The PTS SEL_{24h} ER_{95%} and ER_{max} are indicated by vertical dashed lines.

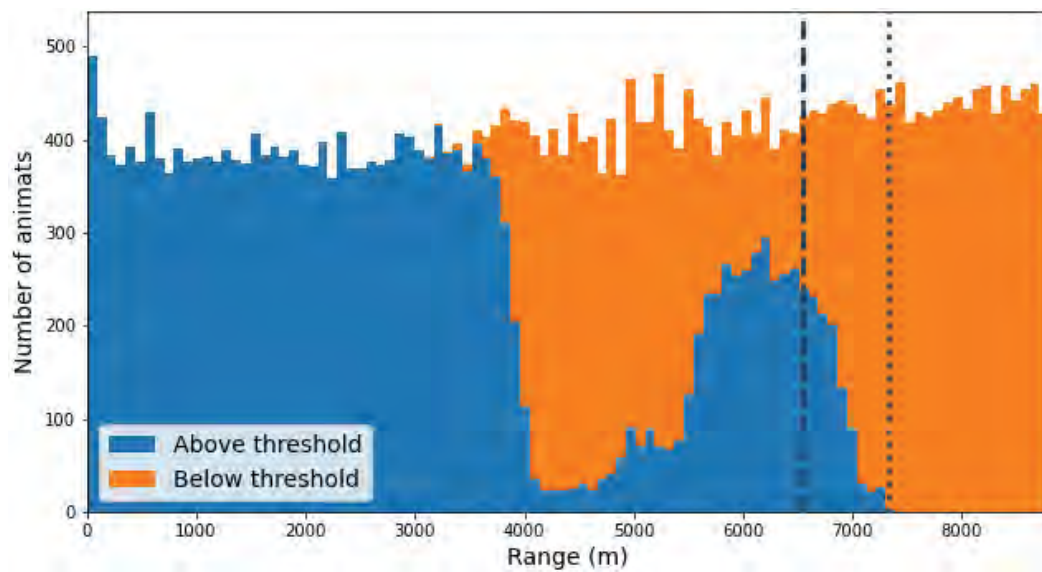


Figure E-5. Histograms of the distribution of CPA ranges for animals exposed above and below the behavioural response threshold criteria for migrating pygmy blue whales. The behavioural response ER_{95%} and ER_{max} are indicated by vertical dashed lines.

Figures E-6 and E-7 demonstrate the accumulation of SEL for TTS and PTS criteria when both the sources and the receivers are moving relative to each other. SEL criteria are assessed over a 24-hour duration, which is reflected in the SEL resets shown in the lower panels of both figures. In Figure E-6, an animal moves in a north-easterly direction and the cumulative SEL increases with proximity to the seismic survey. At approximately 55,000 seconds, the TTS threshold is exceeded. As the animal moves away from the seismic survey area and to the northeast, the SEL accumulation becomes negligible. Figures E-6 and E-7 shows an animal that exceeds both TTS and PTS thresholds within the first 24-hour period. Since the animals are modelled as migrating, they spend less time accumulating energy near the source, and instead follow a relatively direct path into and through the ensonified area. To accumulate levels that exceed PTS or TTS threshold criteria, they need to pass close to the source. Conversely, those animals that were restricted to the BIA were never exposed to levels for long enough to exceed any of the cumulative thresholds.

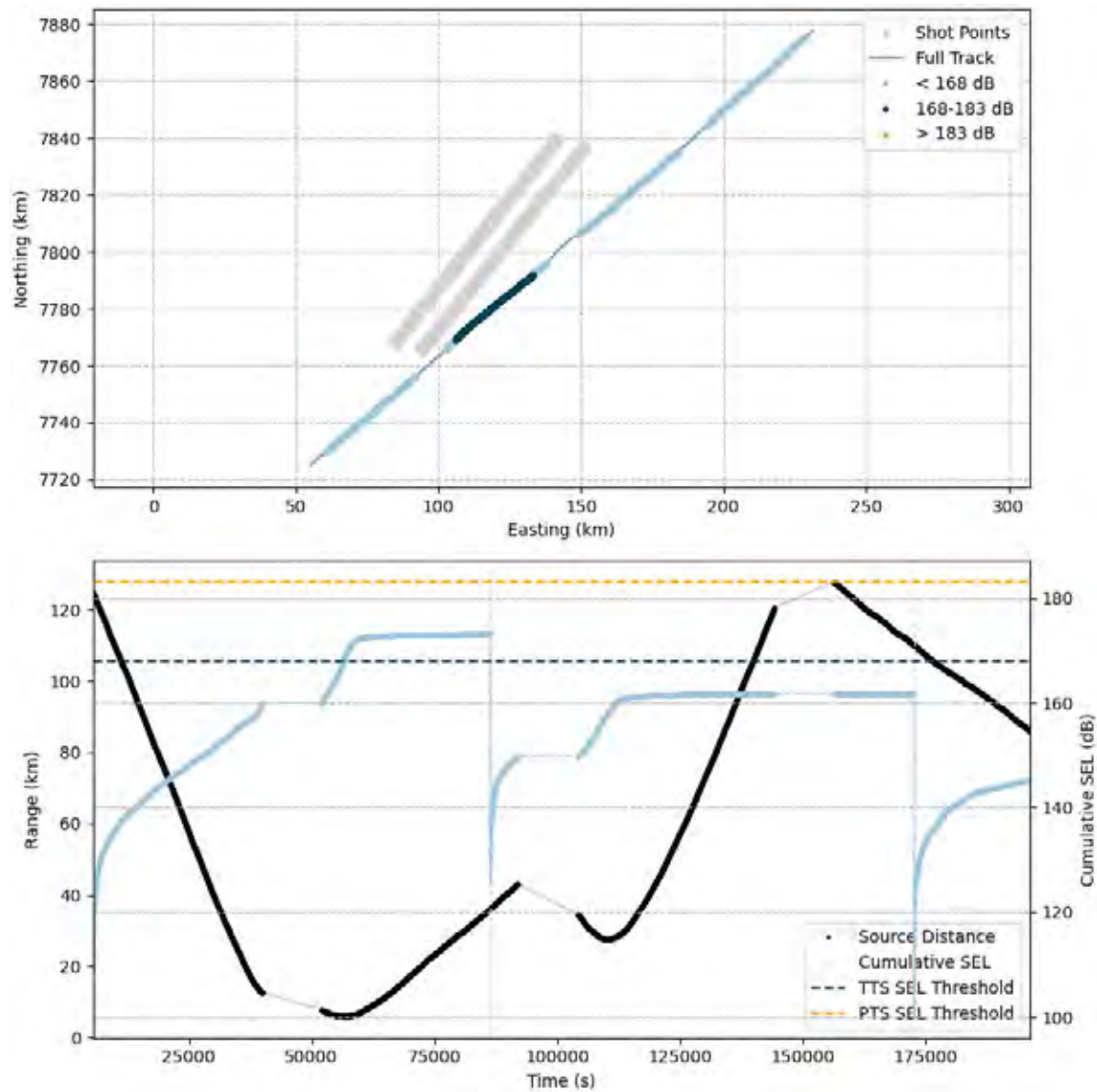


Figure E-6. Plots showing animal track over a duration of approximately 2.2 days. The upper panel shows a plan view of both the source tracks and the migrating animal. Animal steps are coloured to indicate whether the accumulated sound energy at that point has exceeded either TTS or PTS threshold criteria. The lower panel shows horizontal distance in kilometres to the seismic source (black dots; left y-axis), and cumulative 24-h SEL ($L_{E,24h}$, dB re $1 \mu\text{Pa}^2\cdot\text{s}$; right y-axis).

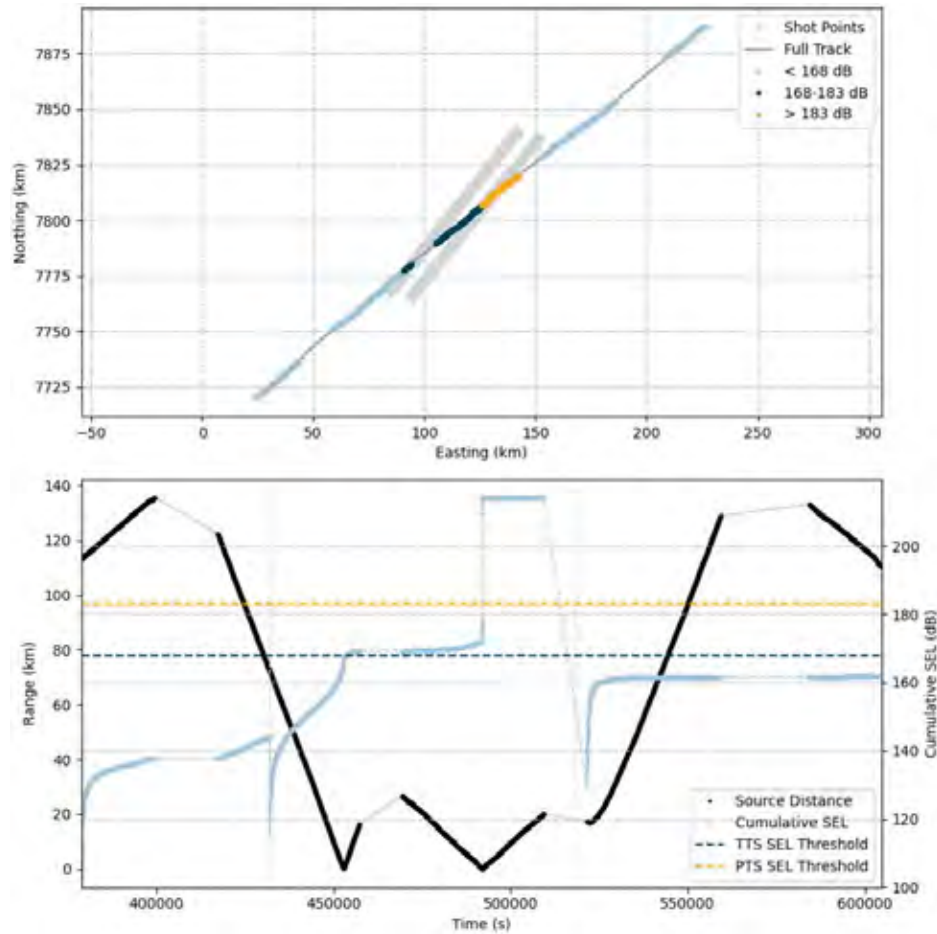


Figure E-7. Plots showing animal track over a duration of approximately 2.5 days. The upper panel shows a plan view of both the source tracks and the migrating animal. Animal steps are coloured to indicate whether the accumulated sound energy at that point has exceeded either TTS or PTS threshold criteria. The lower panel shows horizontal distance in kilometres to the seismic source (black dots; left y-axis), and cumulative 24-h SEL ($L_{E,24h}$, dB re $1 \mu\text{Pa}^2\text{-s}$; right y-axis).

Appendix H MASTER WOODSIDE EXISTING ENVIRONMENT

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Description of the Existing Environment

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1. INTRODUCTION

1.1 Purpose

This document applies, where indicated in the relevant Environment Plan, to Woodside Energy Ltd. (Woodside) activities and operations.

1.2 Scope

This document describes the existing environment within the Woodside areas of activity located in Commonwealth waters off north-western Western Australia (WA), with a focus on the North-west Marine Region (NWMR) (**Figure 1-1**). This document includes details of the particular and relevant values and sensitivities of the environment as required by the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 in order to inform the impact and risk evaluation of Woodside's activities within the NWMR. Furthermore, the key values of the South-west Marine Region (SWMR) and the North Marine Region (NMR) are summarised to encompass areas outside the NWMR. This is with reference to the environment that may be affected (EMBA), as defined and described in individual EPs, for unplanned hydrocarbon spill risks. Additional information appropriate to the nature and scale of the impacts and risks of activities that may interact with the environment will be used to further inform impact and risk assessments and included in the Description of the Existing Environment of individual EPs.

This document is informed by a variety of resources that includes: a search of the Department of Agriculture, Water and the Environment (DAWE) Protected Matters Search Tool (PMST) for the marine bioregions (NWMR, SWMR and NMR) and the three PMST reports provided in **Appendix A**; State (WA)/Commonwealth Marine Park Management Plans, the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Species Profile and Threats Database (SPRAT), Part 13 statutory instruments (recovery plans, conservation advices and wildlife conservation plans for listed threatened and migratory species); and peer reviewed scientific publications, as well as Woodside and Joint Venture (JV) funded studies and other titleholder funded study findings available in the public domain.

1.3 Review and Revision

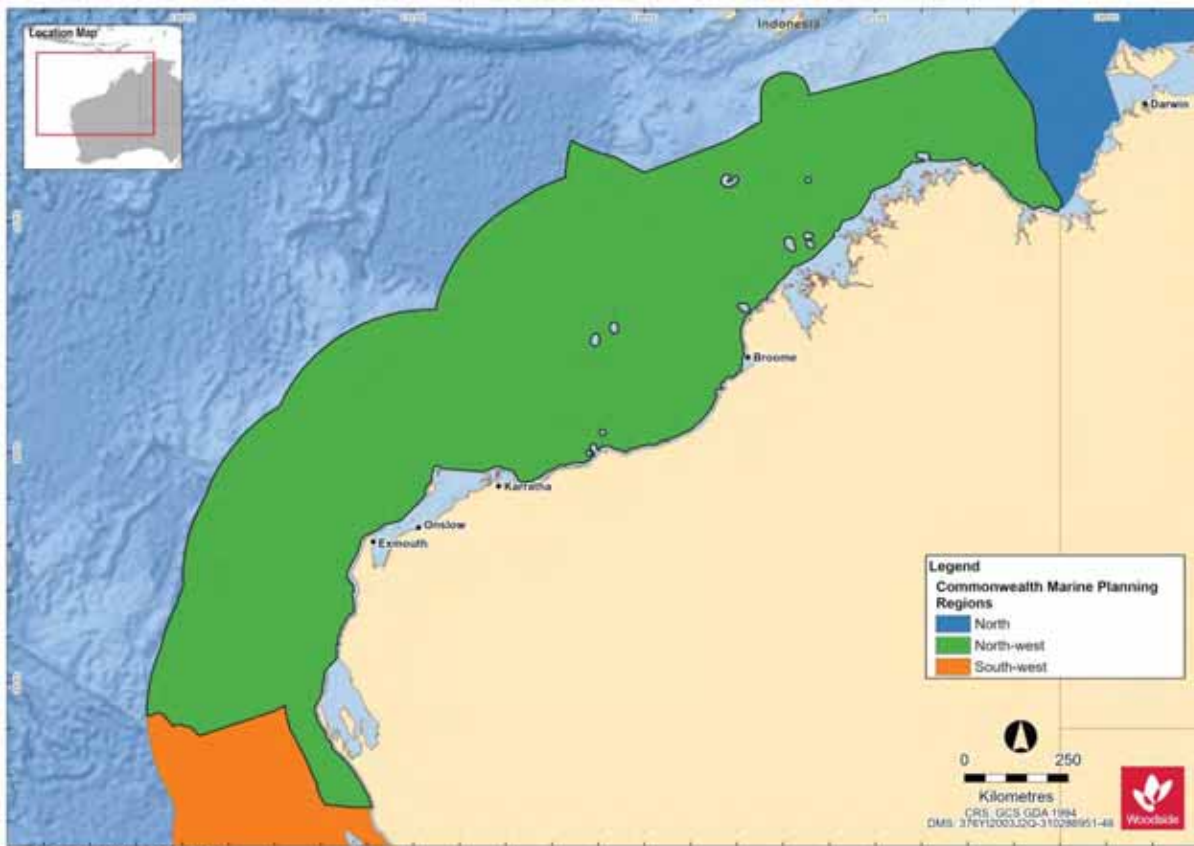
The information presented in this document is reviewed and updated, where relevant, on at least an annual basis to address any relevant changes, which includes but is not limited to the status of EPBC Act listed species, Part 13 Instruments, policies and guidelines and recently published scientific literature.

1.4 Regional Context

Where relevant, the physical, biological and social environments within the areas of interest are discussed with reference to the three marine bioregions of Australia—NWMR, SWMR and NMR (**Table 1-1**). The NWMR is the focal marine bioregion for the Description of the Existing Environment as this is currently the location of most of Woodside's activities.

Table 1-1. Description of the Marine Bioregions

Marine Bioregion	Description
North-west	The NWMR includes all Commonwealth waters (from 3 nautical mile [nm] from the Territorial Sea Baseline [TSB] to the 200 nm Exclusive Economic Zone [EEZ] boundary) extending from the WA/Northern Territory (NT) border to Kalbarri, south of Shark Bay in WA, covering an area of approximately 1.07 million square kilometres and includes extensive areas of shallower waters on the continental shelf, as well as deep areas of abyssal plain where water depths are 5000 m or greater.
South-west	The SWMR comprises Commonwealth waters from the eastern end of Kangaroo Island in SA to Shark Bay in WA. The region spans approximately 1.3 million square kilometres of temperate and subtropical waters and abuts the coastal waters of SA and WA.
North	The NMR comprises Commonwealth waters from west Cape York Peninsula to the NT/WA border). The region covers approximately 625,689 square kilometres of tropical waters in the Gulf of Carpentaria and Arafura and Timor seas, and abuts the coastal waters of Queensland and the NT.

**Figure 1-1. Marine Bioregions: North-west (NWMR), South-west (SWMR) and North (NMR)**

2. PHYSICAL ENVIRONMENT

2.1 Regional Context

The key physical characteristics of the NWMR, SWMR and NMR are presented in **Table 2-1**.

Table 2-1 Key physical characteristics of the NWMR, SWMR and NMR

Bioregion	Key Characteristics
North-west Marine Region	The NWMR experiences a tropical monsoonal climate towards the northern extent of the region, transitioning to tropical arid and subtropical arid within the central and southern areas of the region (DSEWPAC, 2012a).
	The NWMR is part of the Indo-Australian Basin, the ocean region between the north-west coast of Australia and the Indonesian islands of Java and Sumatra. Dominant currents in the Region include: the South Equatorial Current, the Indonesian Throughflow; the Eastern Gyral Current, and the Leeuwin Current (DEWHA, 2007a).
	The seafloor of the NWMR consists of four general feature types: continental shelf; continental slope; continental rise; and abyssal plain and is distinguished by a range of topographic features including canyons, plateaus, terraces, ridges, reefs, and banks and shoals.
South-west Marine Region	The SWMR contains both subtropical and temperate climates, with overall light climatic cycles.
	The SWMR experiences complex and unusual oceanographic patterns, driven largely by the Leeuwin Current and its associated currents that have a significant influence on biodiversity distribution and abundance.
	The major seafloor features of the SWMR include a narrow continental shelf on the west coast to the waters off south-west WA, and a wide continental shelf dominated by sandy carbonate sediments of marine origin in the Great Australian Bight, the region also contains a steep, muddy continental slope, many canyons and large tracts of abyssal plains (DSEWPAC, 2012b).
North Marine Region	The NMR experiences a tropical monsoonal climate with complex weather cycles, including high temperatures and heavy seasonal yet variable rainfall and cyclones, which can be both destructive (loss of seagrass and mangroves) and constructive (mobilisation of sediment into coastal habitats).
	The NMR comprises Commonwealth waters from west Cape York Peninsula to the NT-WA border, covering tropical waters in the Gulf of Carpentaria and Arafura and Timor seas. Currents in the NMR are driven largely by strong winds and tides, with only minor influences from oceanographic currents such as the Indonesian Throughflow and the South Equatorial Current (DSEWPAC, 2012c).
	The seafloor of the NMR consists mainly of a wide continental shelf, as well as other geomorphological features such as shoals, banks, terraces, valleys, shallow canyons and limestone pinnacles.

2.2 Marine Systems of the North-west Marine Region.

The NWMR can be divided into three large scale ecological marine systems on the basis of the influence of major ocean currents, seafloor features and eco-physical processes (e.g. climate, tides, freshwater inflow) upon the Region (DSEWPAC, 2012a). The three large scale marine systems approximate the Woodside activity areas within the NWMR (**Figure 2-1**). The key characteristics of each marine system are outlined below in **Table 2-2**.

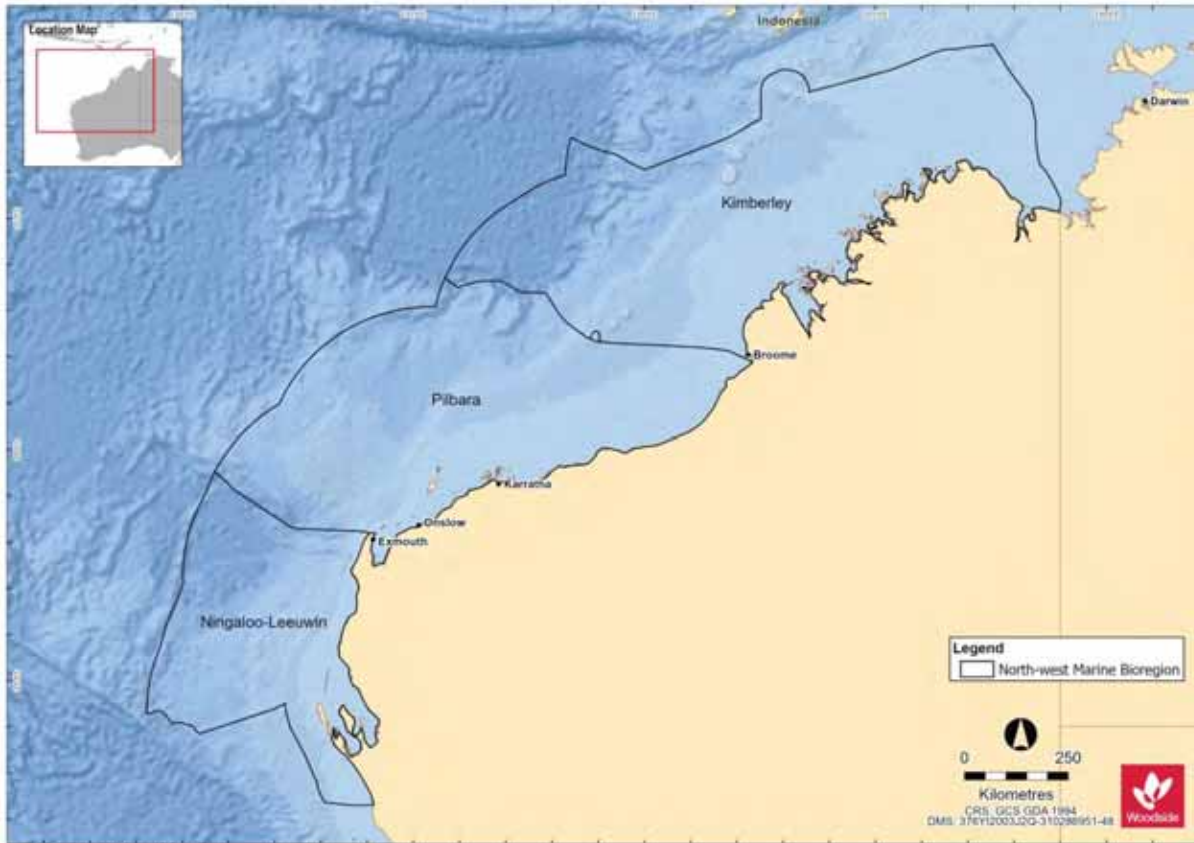


Figure 2-1. The marine systems of the North-west Marine Region (NWMR)

Table 2-2. Key characteristics of the Marine Systems of the NWMR

Note: Woodside areas align with the marine systems as described in DEWHA (2007a)

Marine System	Woodside Activity Area	Key Characteristics
Kimberley	Browse	Tropical monsoonal climate Strong influence from Indonesian Throughflow Predominantly tropical Indo-Pacific species Subject to episodic offshore cyclonic activity, rarely crossing the coast Large tidal regimes Freshwater input from terrestrial monsoonal run-off Turbid coastal waters (i.e. light limited systems) Dominated by shelf environments Predominantly hard substrates in inner to mid-shelf environments Includes a number of shelf-edge atolls (i.e. Scott Reef, Rowley Shoals)
Pilbara	North-west Shelf (NWS) / Scarborough	Tropical arid climate Transition between Indonesian Throughflow and Leeuwin Current dominated areas Predominantly tropical species High cyclone activity with frequent crossing of the coast Transitional tidal zone Internal tide activity Large areas of shelf and slope Dry coast with ephemeral freshwater inputs
Ningaloo-Leeuwin	North-west Cape	Subtropical arid climate Leeuwin Current consolidates Transitional tropical/temperate faunal area Higher water clarity in near-shore and offshore environments Narrow shelf and slope Marginal tidal range Seasonal wind forcing more dominant influence on marine environment

2.3 Meteorology and Oceanography

This section describes the general meteorological conditions and oceanography for the NWMR and provides further detail for the three Woodside activity areas. The NWMR is influenced by a complex system of ocean currents that change between seasons and between years, which generally result in its surface waters being warm and nutrient-poor, and of low salinity (DEWHA, 2007a). The mix of bathymetric features, complex topography and oceanography across the whole north-west marine environment has created and supports a globally important marine biodiversity hotspot (Wilson, 2013).

Table 2-3 NWMR climate and oceanography summary

Receptor	Description
Meteorology	
Seasonal patterns	The NWMR associated land mass of the Australian continent is characterised as a hot and humid summer climate zone. The broader NWMR experiences variations of a tropical or monsoon climate. In the far north-west (Kimberley), there is a hot summer season from December to March and a milder winter season between April and November. The Pilbara area is described as having a tropical arid climate with high cyclone activity (DEWHA, 2007a). The Pilbara and North-west Cape has a hot summer season from October to April and a milder winter season between May and September with transition periods between the summer and winter regimes.
Air temperature and rainfall	In summer (between September and March), maximum daily temperatures range from 31°C to 33°C. During winter (May to July), mean daily temperatures range from 18°C to 31°C (BOM ¹), refer to Figure 2-2a and b . Rainfall in the region typically occurs during the summer, with highest falls observed late in the season. This is often associated with the passage of tropical low-pressure systems and cyclones.
Wind	Wind patterns in north-west WA are dictated by the seasonal movement of atmospheric pressure systems. During summer, high-pressure cells produce prevailing winds from the north-west and south-west, which vary between 10 and 13 ms ⁻¹ . During winter, high-pressure cells over central Australia produce north-easterly to south-easterly winds with average speeds of between 6 and 8 ms ⁻¹ . Refer to Figure 2-3a and b .
Tropical cyclones	The NWS and Pilbara coast (within the NWMR) experiences more cyclonic activity than any other region of the Australian mainland coast (BOM, 2021a). Tropical cyclone activity typically occurs between November and April and is most frequent in the region during December to March (i.e. considered the peak period), with an average of about one cyclone per month (BOM, 2021a). Refer to Figure 2-4 .
Oceanography	
Ocean temperature	Waters in NWMR are tropical year-round, with sea surface temperature in open shelf waters reaching ~26°C in summer and dropping to ~22°C in winter. Nearshore temperatures (as recorded for the NWS area) fluctuate more widely on an annual basis from ~17°C in winter to ~31°C in summer (Chevron Australia, 2010). Refer to Figure 2-5a and b .
Currents	The major surface currents influencing north-west WA flow towards the poles and include the Indonesian Throughflow, the Leeuwin Current, the South Equatorial Current, and the Eastern Gyral Current. The Ningaloo Current, the Holloway Current, the Shark Bay Outflow, and the Capes Current are seasonal surface currents in the region. Below these surface currents are several subsurface currents, the most important of which are the Leeuwin Undercurrent and the West Australian Current. These subsurface currents flow towards the equator in the opposite direction to surface currents (DEWHA, 2007a). Refer to Figure 2-6 . The offshore waters of the NWMR are characterised by surface and subsurface boundary currents that flow along the continental shelf/slope and are enhanced through inflows from the ocean basins and are an important conduit for the poleward heat and mass transport along the west coast (Wijeratne <i>et al.</i> , 2018). Local physical oceanography is strongly influenced by the large-scale water movements of the Indonesian Throughflow (Liu <i>et al.</i> 2015; Sutton <i>et al.</i> 2019). Typically, a warm and well-mixed oligotrophic surface layer and a cooler and more nutrient rich, deeper water layer (Menezes <i>et al.</i> 2013).
Waves	Sea surface waves within the NWMR, generally reflect the direction of the synoptic winds and flow predominately from the south-west in the summer and east in winter (Pearce <i>et al.</i> , 2003). The NWS within the NWMR is a known area of internal wave generation. Both internal tides and internal waves are thought to be more prevalent during summer months due to the increased stratification of the water column (DEWHA, 2007a). Along the continental slope of the NWMR, strong internal waves and interaction between semi-diurnal tidal currents and seabed topographic features facilitates upwelling events and localised productivity events (Holloway, 2001).
Tides	Tides on the NWS (NWMR) increase as the water moves from deep towards the shallower coast. The highest offshore tides are experienced at the border of the Browse and Canning basins. The smallest tides are experienced at the Exmouth Plateau, near the coast. Tides of NWS (NWMR) are predominantly semi-diurnal (two highs and two lows each day), but with increasing importance of the diurnal (once per day) inequality at the southern and northern extremities of the NWS.

¹ http://www.bom.gov.au/jsp/ncc/climate_averages/temperature/index.jsp, accessed 21 January 2021.

Receptor	Description
	The tide range—represented by the Mean Spring Range (MSR)—increases northwards along the coast from 1.4 m at North-west Cape (Point Murat) to 7.7 m at Broome, before decreasing again (apart from local amplification in King Sound and Collier Bay) to about 5 m off Cape Londonderry. The MSR then increases again through Joseph Bonaparte Gulf and on up 5.5 m at Darwin (RPS, 2016).

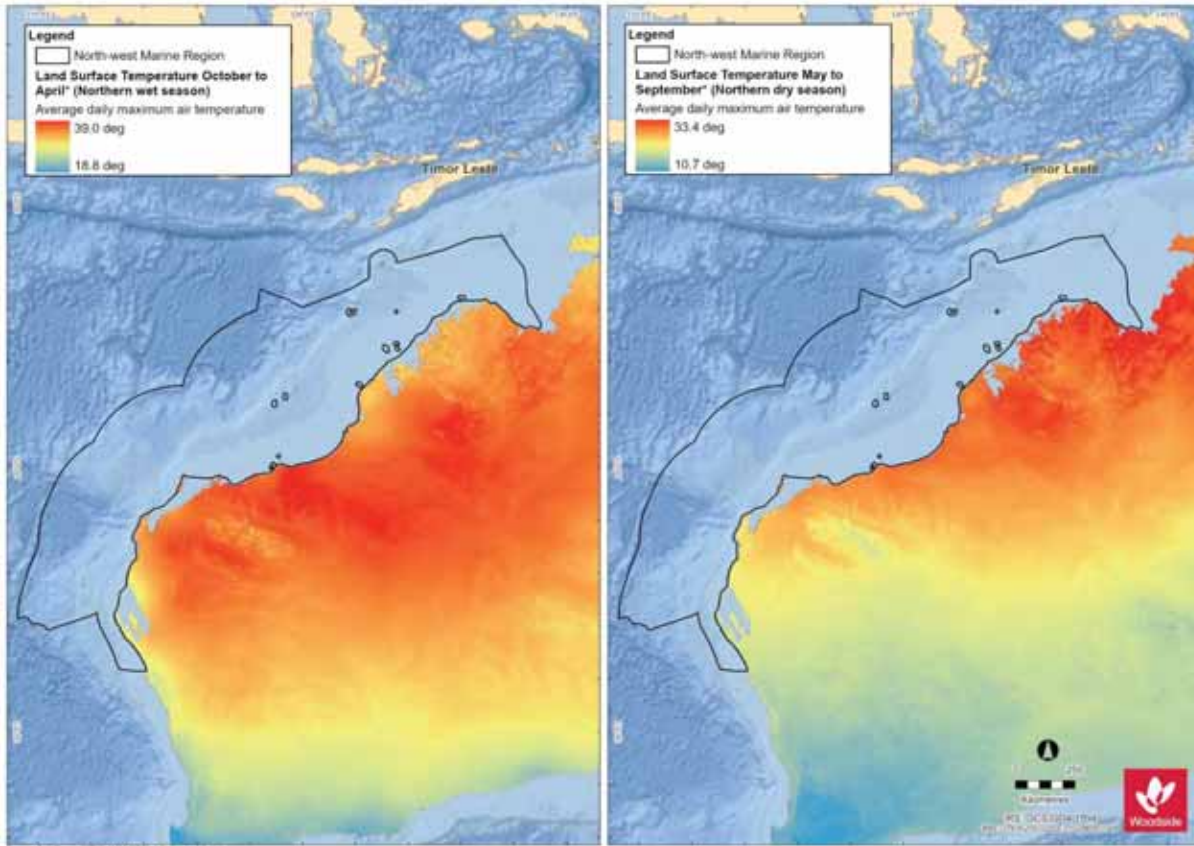


Figure 2-2. Average daily maximum air temperature for land surface adjacent to NWMR: (a) summer (northern wet season) and (b) winter (northern dry season)

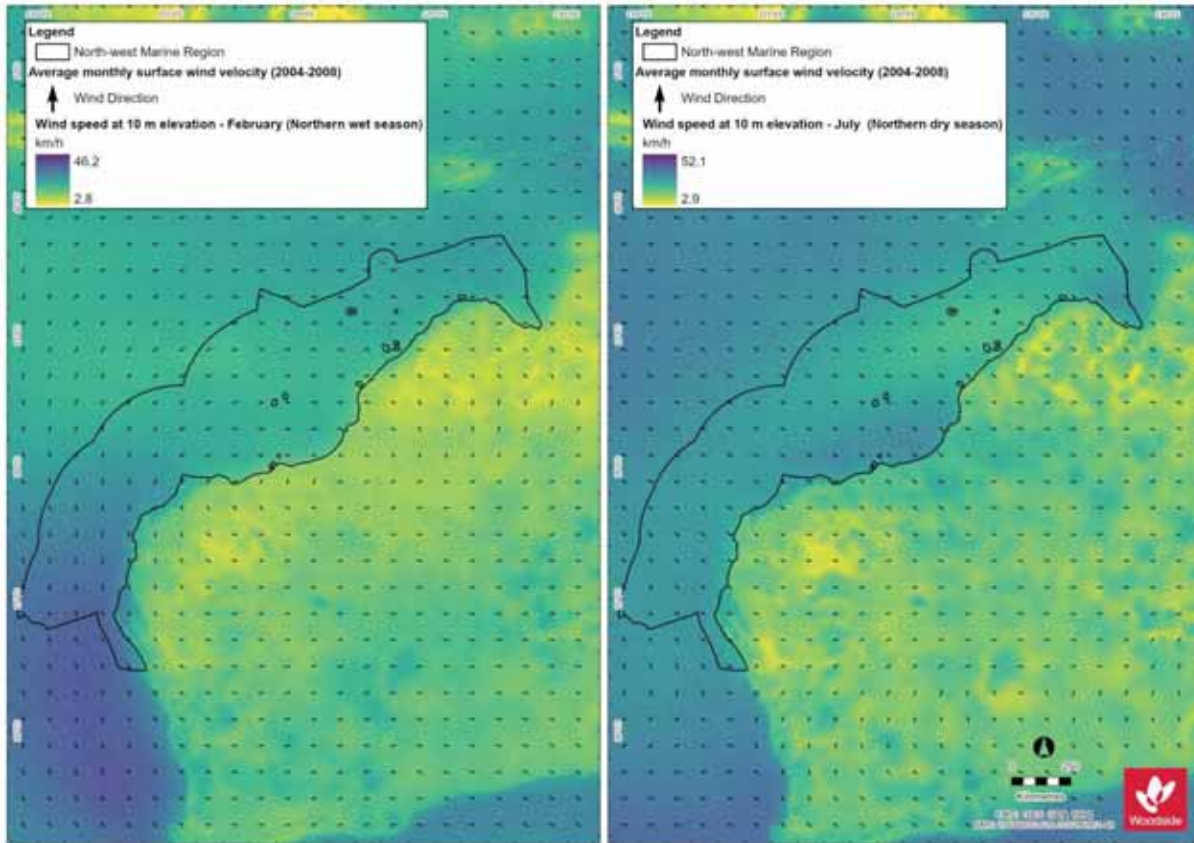


Figure 2-3. Average monthly surface wind direction and velocity for NWMR: (a) summer (February, northern wet season) and (b) winter (July, northern dry season)

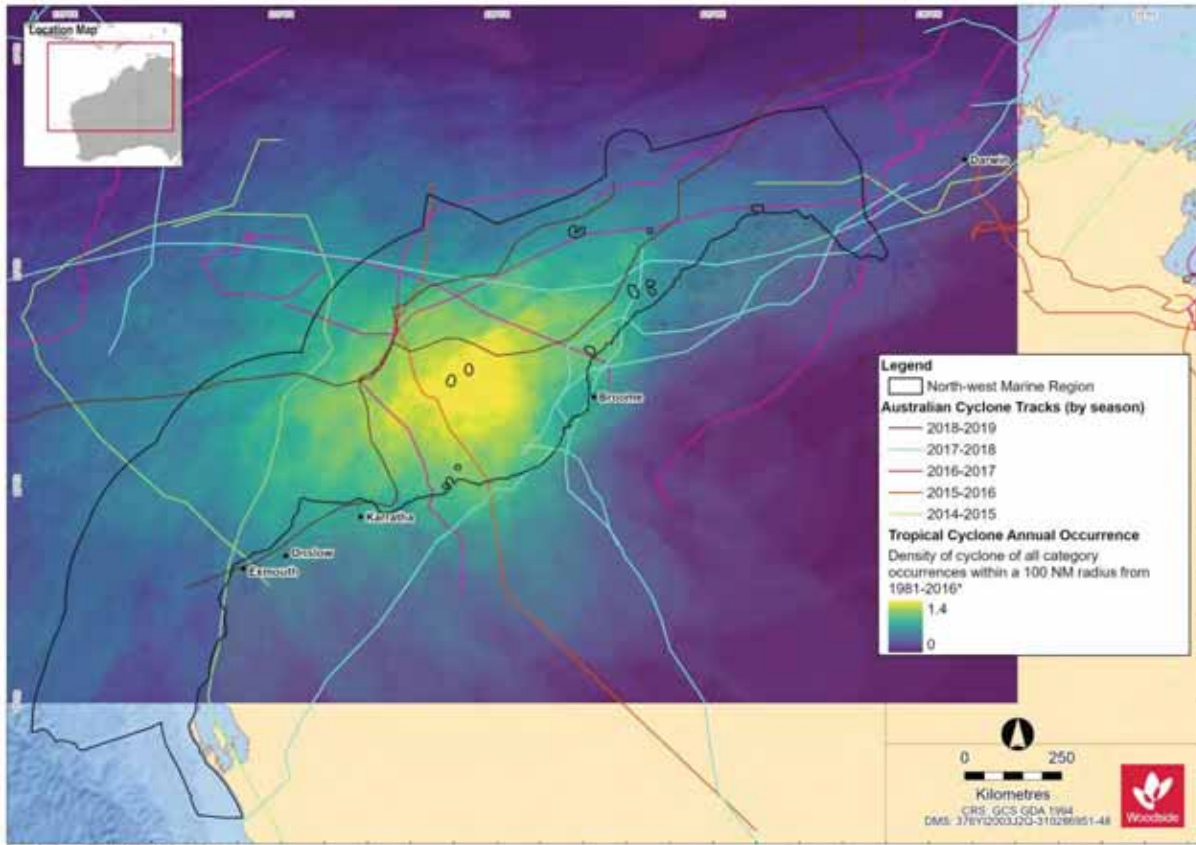


Figure 2-4. Tropical cyclone annual occurrence and cyclone tracks for NWMR

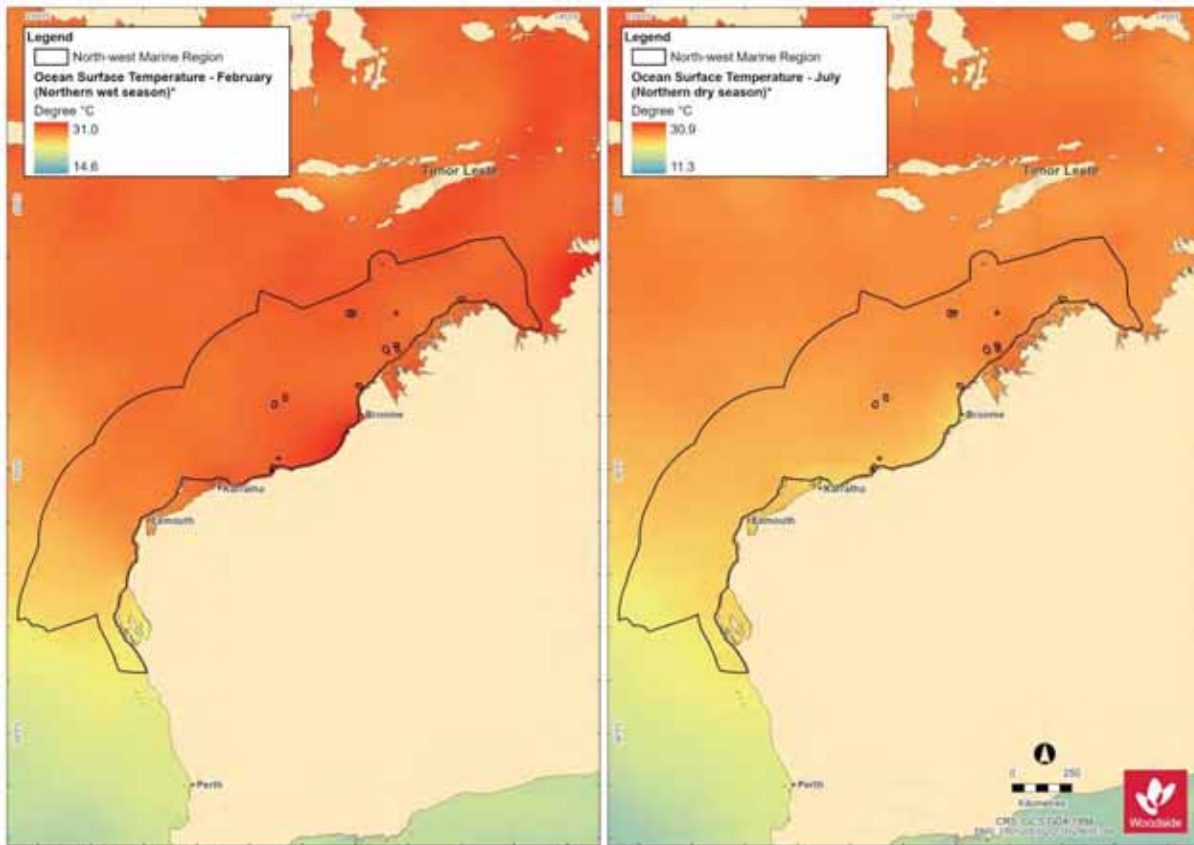


Figure 2-5. Ocean surface temperature for NWMR: (a) summer (February, northern wet season) and (b) winter (July, northern dry season)

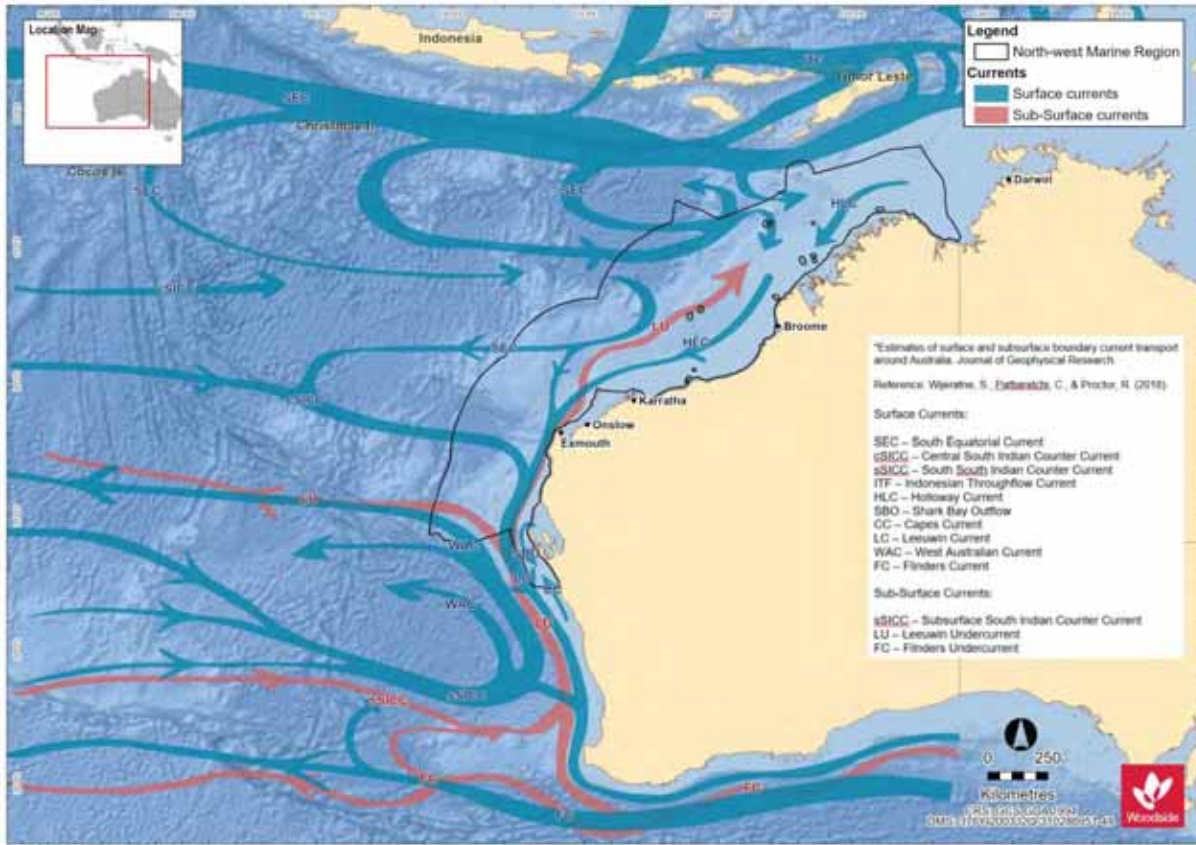


Figure 2-6. Ocean surface and sub-surface currents of the NWMR and wider region

2.3.1 Browse

Table 2-4 Summary meteorology and oceanography for Browse (refer to Appendix B for supporting metocean figures)

Receptor	Description
Meteorology	
Seasonal patterns	The Browse area overlapping the Kimberley marine system experiences tropical monsoon climate with two distinct seasons: the wet season from December to March and dry season from April to November.
Air temperature	The mean annual air temperature recorded at Troughton Island between 2010 and 2020 ranged from 30.1°C in 2011 to 32.6°C in 2016 and highest mean monthly air temperatures were recorded for the months of November and December (BOM, 2021b).
Rainfall	Rainfall recorded from Troughton Island in the Browse basin ranged from barely detectable (<1 mm) mean monthly level to >100 mm in December to March, with the highest rainfall recorded for January. Reflecting the wet monsoon season of the Kimberley marine system (BOM, 2021c).
Wind	The dry season experiences high pressure systems that bring east to south-easterly winds with average wind speeds during the season of approximately 16.6 km/hr and maximum wind gusts of 65 km/hr. In contrast the wet season brings predominately westerly winds with average wind speeds approximately 17 km/hr and maximum gusts exceeding 100 km/hr (generally associated with tropical cyclones (MetOcean Engineers, 2005).
Oceanography	
Currents	Surface currents exhibit seasonal directionality, with flow to the south-west during March to June and more variable outside this period (Woodside, 2019). This is consistent with the stronger Leeuwin Current flow during winter months, with more variable currents driven by local wind stress during periods of weaker Leeuwin Current flow.

2.3.2 North West Shelf / Scarborough

Table 2-5 Summary meteorology and oceanography for the North West Shelf and Scarborough (refer to Appendix B for supporting metocean figures)

Receptor	Description
Meteorology	
Seasonal patterns	The NWS and Scarborough areas experience the monsoonal climate of the wider NWMR with a distinct wet and dry seasonal regime and transitions periods between seasons.
Air temperature	Air temperatures as measured at the North Rankin A platform on NWS ranged from a maximum average of 39.5°C in summer to a minimum average temperature of 15.6°C in winter (Woodside, 2012).
Rainfall	Rainfall patterns annually reveal the wet season with highest rainfalls during the late summer, often associated with the passage of tropical low-pressure systems and cyclones. Rainfall in the dry season is typically extremely low. (Pearce <i>et al.</i> 2003).
Wind	Winds are typically from the southwest during the wet season (summer) and tending from the south-east during the dry season (winter). The summer south-westerly winds are driven by high pressure cells that pass from west to east over the Australian continent. During the winter period, the relative position of the high-pressure cells shifts further north, leading to prevailing south-easterly winds from the mainland (Pearce <i>et al.</i> 2003).
Oceanography	
Currents	The large-scale ocean currents of the NWMR, primarily the Indonesian Throughflow and Leeuwin Current (and Holloway Current), are the primary influence on the NWS and Scarborough areas. The ITF and Leeuwin Current are strongest during the late summer and winter and flow reversals to the north-east, typically short-lived and weak, when there are strong south-westerly winds can generate localised upwelling on the shelf edge (Holloway and Nye, 1985; James <i>et al.</i> 2004 and Condie <i>et al.</i> 2006).

2.3.3 North-west Cape

Table 2-6 Summary meteorology and oceanography for the North-west Cape (refer to Appendix B for supporting metocean figures)

Receptor	Description
Meteorology	
Seasonal patterns	The climate of the NWMR is dry tropical exhibiting a hot summer season and a mild winter season. There are often distinct transition periods between the summer and winter regimes, characterised by periods of relatively low winds.
Air temperature	Air temperatures in the North-west Cape area range from high summer temperatures (maximum average of 37.5°C) and mild winter temperatures (minimum average of 12.2°C).
Rainfall	Rainfall typically occurs during the summer, with highest rainfall during later summer and autumn, often associated with the passage of tropical low-pressure systems and cyclones. Rainfall is typically low in winter.
Wind	Winds vary seasonally, generally from the south-west quadrant during summer months and the south, south-east quadrant during the autumn and winter months. The summer south-westerly winds are driven by high pressure cells that pass from west to east over the Australian continent. Winds typically weaken and are more variable during the transitional period between the summer and winter seasons, generally between April to August.
Oceanography	
Currents	Surface currents exhibit seasonal directionality, with flow to the south-west during March to June and more variable outside this period (Woodside, 2016). This is consistent with the stronger Leeuwin Current flow during winter months, with more variable currents driven by local wind stress during periods of weaker Leeuwin Current flow.

2.4 Physical Environment of NWMR

Based on the Integrated Marine and Coastal Regionalisation of Australia (IMCRA) Version 4.0, there are eight provincial bioregions that occur within the NWMR, which are based on patterns of demersal fish diversity, benthic habitat and oceanographic data (Commonwealth of Australia, 2006), **Figure 2-7**. Of the eight provincial bioregions that occur within the NWMR, these include four offshore (~65% of total NWMR area) and four shelf (~35% of total NWMR area) bioregions (Baker *et al.*, 2008).

The NWMR is a tropical carbonate margin that comprises an extensive area of shelf, slope and abyssal plain/deep ocean floor, as well as complex areas of bathymetry such as plateau, terraces and major canyons (Harris *et al.*, 2005). A series of reefs are located on the outer shelf/slope of the NWMR, including Ashmore, Cartier, Scott and Seringapatam reefs (Baker *et al.*, 2008). The distribution of seafloor geomorphic features has been systematically mapped over much of the Australian margin and adjacent seafloor. The mapped area can be divided into 10 geomorphic regions, of which the NWMR overlays two; the Western Margin and Northern Margin (Harris *et al.*, 2005). Most of the region consists of either continental slope (61%) or continental shelf (28%) (DEWHA, 2007a) with more than 40% of the NWMR having a water depth less than 200 m. The shallow shelf is contrasted by features such as the Cuvier and Argo abyssal plains, which reach depths more than five kilometres. A unique feature of the region is the significant narrowing of the continental shelf around North-west Cape (approximately 7 km wide) from the broad continental shelf in the north of the region (approximately 400 km wide at Joseph Bonaparte Gulf) (DEWHA, 2007a), **Figure 2-8**.

The geological history of the region, as well as its geomorphology and oceanography, has influenced the composition and distribution of sediments (DEWHA, 2007a). The sedimentology of the NWMR is dominated by marine carbonates, which show a broad zoning and fining with water depth. Main trends of the NWMR sediments include a tropical carbonate shelf that is dominated by sand and gravel, an outer shelf/slope zone that is dominated by mud and a relatively homogenous rise and abyssal plain/deep ocean floor that is dominated by non-carbonate mud (Baker *et al.*, 2008), **Figure 2-9**.

The distribution and resuspension of sediments on the inner shelf is strongly influenced by the strength of tides across the continental shelf as well as episodic events such as cyclones. Further offshore, on the mid to outer shelf and on the slope itself, sediment movement is primarily influenced by ocean currents and internal tides (DEWHA, 2007a).

This variation in bathymetry and interactions with oceanographic processes provides a diversity of habitats to marine fauna and flora within the NWMR.

2.5 Air quality

The ambient air quality of all three marine regions is largely unpolluted due to the extent of the open ocean area, the activities currently carried out in each and the relative remoteness of each region.

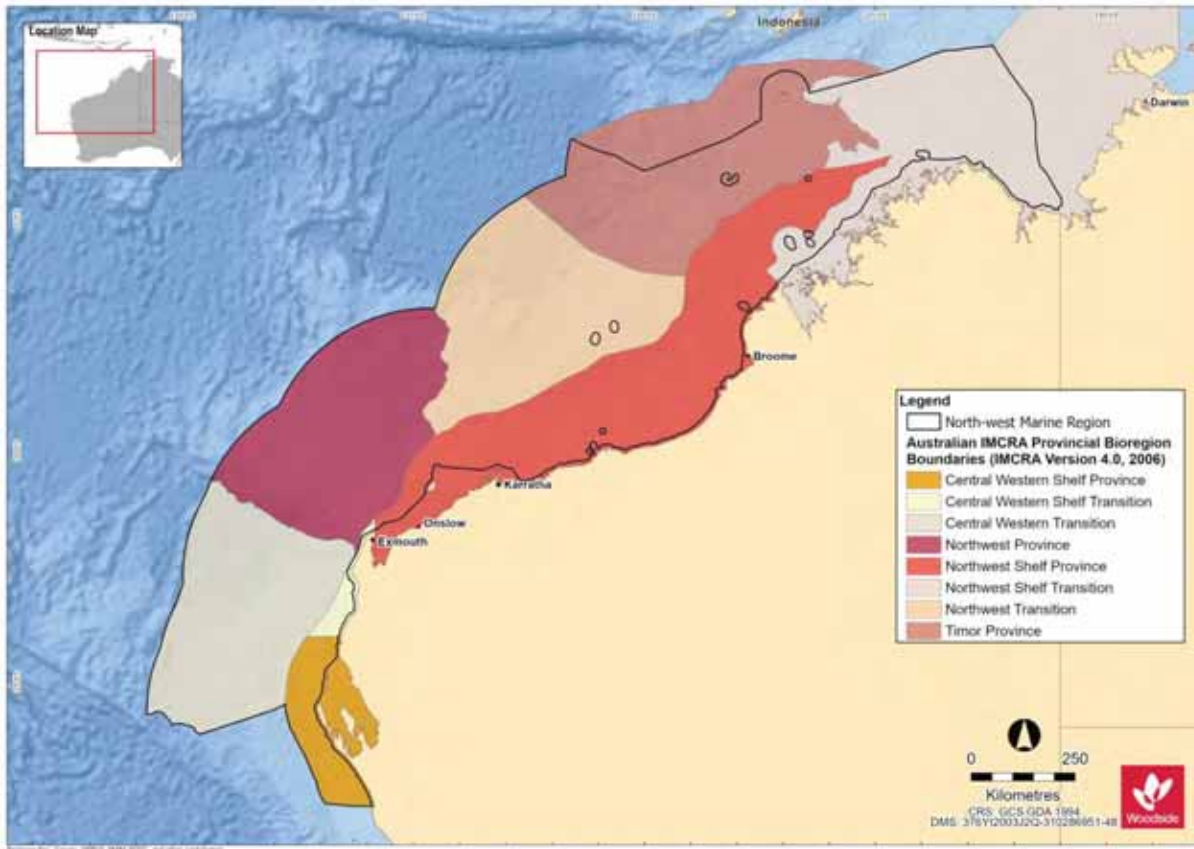


Figure 2-7. The eight provincial bioregions of the NWMR (Commonwealth of Australia, 2006)

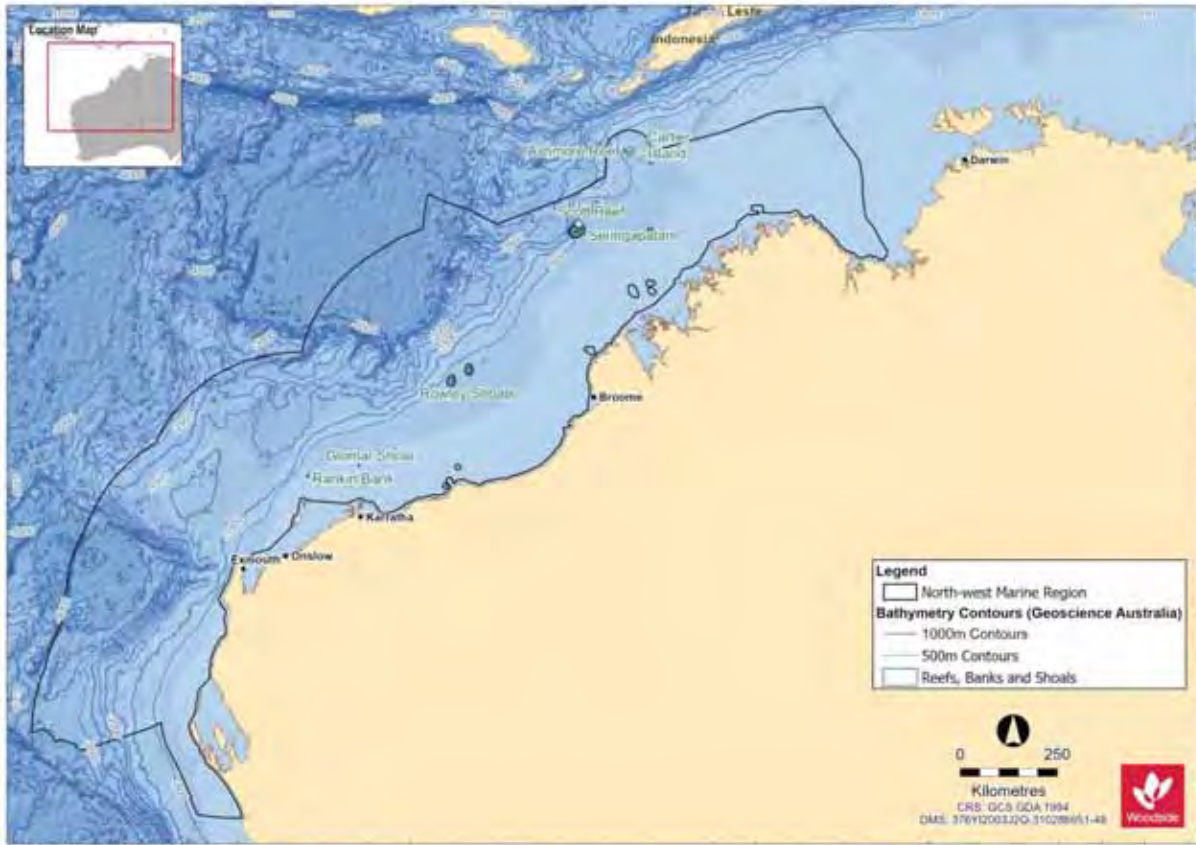


Figure 2-8. Bathymetry of the NWMR

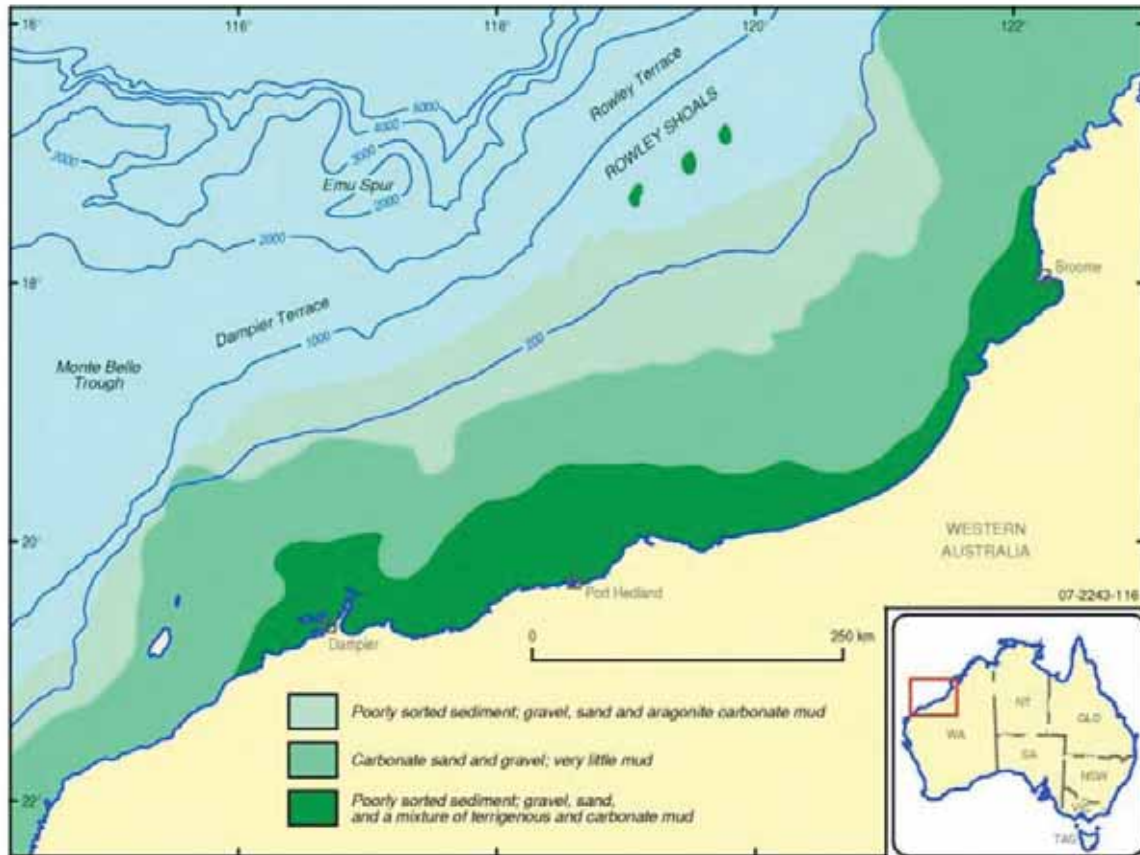


Figure 2-9. Overview of the seabed sediments of the NWMR (Baker *et al.*, 2008)

3. MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE (EPBC ACT)

3.1 Summary of Matters of National Environmental Significance (MNES)

This section summarises the matters of national environmental significance (MNES) reported for the three bioregions; NWMR (**Table 3-1**), SWMR (**Table 3-2**) and NMR (**Table 3-3**), based on the Protected Matters search reports (**Appendix A**).

Additional information on these MNES are provided in subsequent sections (referenced below).

Table 3-1 Summary of MNES identified by the EPBC Act Protected Matters Search Tool (PMST) as potentially occurring within the NWMR

MNES	Number	Description	Section of this Document
World Heritage Properties	2	Shark Bay The Ningaloo Coast	Section 10
National Heritage Places	5	Shark Bay The Ningaloo Coast The West Kimberley The Dampier Archipelago (Including Burrup Peninsula) Dirk Hartog Landing Site 1616	Section 10
Wetlands of International Importance (Ramsar)	3	Ashmore Reef National Nature Reserve Eighty Mile Beach Roebuck Bay ¹	Section 10
Commonwealth Marine Area	2	EEZ and Territorial Sea Key Ecological Features (KEFs) Australian Marine Parks (AMPs) Australian Whale Sanctuary Extended Continental Shelf	Section 9 Section 10
Listed Threatened Ecological Communities	1	Monsoon vine thickets on the coastal sand dunes of Dampier Peninsula	Terrestrial community and not considered further
Listed Threatened Species	70	Refer NWMR PMST report (Appendix A)	Section 5 – Section 8
Listed Migratory Species	84	Refer NWMR PMST report (Appendix A)	Section 5 – Section 8

¹ Roebuck Bay is a designated Wetland of International Importance (Ramsar site), which was not included in the PMST Report (**Appendix A**).

Table 3-2 Summary of MNES identified by the EPBC Act Protected Matters Search Tool (PMST) as potentially occurring within the SWMR

MNES	Number	Description	Section of this Document
World Heritage Properties	0	N/A	N/A
National Heritage Places	3	Cheetup Rock Shelter Batavia Shipwreck Site and Survivor Camps Area 1629 – Houtman Abrolhos HMAS Sydney II and HSK Kormoran Shipwreck Sites	Section 10
Wetlands of International Importance (Ramsar)	4	Becher Point Wetlands Forrestdale and Thomsons Lakes Peel-Yalgorup System Vasse-Wonnerup System	Section 10
Commonwealth Marine Area	2	EEZ and Territorial Sea KEFs AMPs Australian Whale Sanctuary Extended Continental Shelf	Section 9 Section 10
Listed Threatened Ecological Communities	3	Banksia Woodlands of the Swan Coastal Plain ecological community Proteaceae Dominated Kwongan Shrublands of the Southeast Coastal Floristic Province of Western Australia Tuart (<i>Eucalyptus gomphocephala</i>) Woodlands and Forests of the Swan Coastal Plain ecological community	Terrestrial communities and not considered further
Listed Threatened Species	65	Refer SWMR PMST report (Appendix A)	N/A
Listed Migratory Species	67	Refer SWMR PMST report (Appendix A)	N/A

Table 3-3 Summary of MNES identified by the EPBC Act Protected Matters Search Tool (PMST) as potentially occurring within the NMR

MNES	Number	Description	Section of this Document
World Heritage Properties	0	N/A	N/A
National Heritage Places	0	N/A	N/A
Wetlands of International Importance (Ramsar)	0	N/A	N/A
Commonwealth Marine Area	2	EEZ and Territorial Sea KEFs AMPs Australian Whale Sanctuary Extended Continental Shelf	Section 9 Section 10
Listed Threatened Ecological Communities	0	N/A	N/A
Listed Threatened Species	33	Refer NMR PMST report (Appendix A)	N/A
Listed Migratory Species	70	Refer NMR PMST report (Appendix A)	N/A

3.2 Part 13 Statutory Instruments for EPBC Act Listed Threatened and Migratory Species in the NWMR, SWMR and NMR

A screening process was conducted to identify which EPBC Act listed threatened and migratory species, and associated Part 13 statutory instruments, are relevant in the context of the assessment of impacts and risks associated with petroleum activities in each of the Woodside activity areas, using the following criteria:

- overlap between the Woodside activity areas with habitat critical for the survival of marine turtles, and with BIAs (overlapping the marine environment) for any listed threatened species as reported in the PMST searches;
- published literature, unpublished reports and/or credible anecdotal information (e.g. feedback from stakeholders) indicating species presence/occurrence within the Woodside activity areas;
- temporal overlap between the likely timing of petroleum activities and peak periods for key behaviours (e.g. breeding, nesting, calving, resting, foraging, migration); and
- environmental aspects associated with petroleum activities have been identified as a key threat to a species in a Part 13 statutory instrument (e.g. anthropogenic noise, light emissions, marine debris).

Relevant EPBC Act threatened and migratory species and their Part 13 statutory instruments are listed in **Table 3-4**. For the full list of EPBC Act listed species for each marine bioregion refer to the PMST reports (**Appendix A**).

Table 3-4 Summary of MNES identified by the EPBC Act Protected Matters Search Tool (PMST) to be considered for impact or risk evaluation for Woodside operations

EPBC Act Part 13 Statutory Instrument	
All vertebrate marine fauna	Threat Abatement Plan for the impacts of marine debris on vertebrate marine life (Commonwealth of Australia, 2018)
Marine Mammals	
Blue whale	Conservation Management Plan for the Blue Whale: A Recovery Plan under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> 2015–2025 (Commonwealth of Australia, 2015a)
Southern right whale	Conservation Management Plan for the Southern Right Whale: A Recovery Plan under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> 2011–2021 (DSEWPAC, 2012d)
Sei whale	Conservation Advice <i>Balaenoptera borealis</i> sei whale (Threatened Species Scientific Committee, 2015a)
Humpback whale	Conservation Advice <i>Megaptera novaeangliae</i> humpback whale (Threatened Species Scientific Committee, 2015b)
Fin whale	Conservation Advice <i>Balaenoptera physalus</i> fin whale (Threatened Species Scientific Committee, 2015c)
Australian sea lion	Recovery Plan for the Australian Sea Lion (<i>Neophoca cinerea</i>) 2013 (DSEWPAC, 2013a) (due to expire in October 2023) Conservation Advice <i>Neophoca cinerea</i> Australian Sea Lion (Threatened Species Scientific Committee, 2020a) (in effect under the EPBC Act from 23-Dec-2020)
Marine Reptiles	
All marine turtle species (loggerhead, green, leatherback, hawksbill, flatback, olive ridley)	Recovery Plan for Marine Turtles in Australia 2017-2027 (Commonwealth of Australia, 2017)
Short-nosed sea snake	Approved Conservation Advice for <i>Aipysurus apraefrontalis</i> (Short-nosed Sea Snake) (DSEWPAC, 2011a)
Leaf-scaled sea snake	Approved Conservation Advice for <i>Aipysurus foliosquama</i> (Leaf-scaled Sea Snake) (DSEWPAC, 2011b)
Fishes, Sharks, Rays and Sawfishes	
Grey nurse shark (west coast population)	Recovery Plan for the Grey Nurse Shark (<i>Carcharias taurus</i>) 2014 (DOE, 2014)
White shark	Recovery Plan for the White Shark (<i>Carcharodon carcharias</i>) 2013 (DSEWPAC, 2013b)
Whale shark	Conservation Advice <i>Rhincodon typus</i> whale shark (Threatened Species Scientific Committee, 2015d)
All sawfishes (largetooth, green, dwarf, speartooth, narrow)	Sawfish and River Sharks Multispecies Recovery Plan (Commonwealth of Australia, 2015b)

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EPBC Act Part 13 Statutory Instrument	
Seabirds	
Migratory seabird species	Draft Wildlife Conservation Plan for Migratory Seabirds (Commonwealth of Australia, 2019)
Southern giant petrel	National recovery plan for threatened albatrosses and giant petrels 2011–2016 (DSEWPAC, 2011c)
Indian yellow-nosed albatross	National recovery plan for threatened albatrosses and giant petrels 2011–2016 (DSEWPAC, 2011c)
Abbott's booby	Conservation Advice for the Abbott's booby - <i>Papasula abbotti</i> (Threatened Species Scientific Committee, 2020b)
Australian fairy tern	Approved Conservation Advice for <i>Sterna nereis nereis</i> (Fairy Tern) (DSEWPAC, 2011d)
Australian lesser noddy	Conservation Advice <i>Anous tenuirostris melanops</i> Australian lesser noddy (Threatened Species Scientific Committee, 2015e)
Soft-plumaged petrel	Conservation Advice <i>Pterodroma mollis</i> soft-plumaged petrel (Threatened Species Scientific Committee, 2015f)
Shorebirds	
Migratory shorebird species	Wildlife Conservation Plan for Migratory Shorebirds (Commonwealth of Australia, 2015c)
Eastern curlew, far eastern curlew	Conservation Advice <i>Numenius madagascariensis</i> eastern curlew (DOE, 2015a)
Curlew sandpiper	Conservation Advice <i>Calidris ferruginea</i> curlew sandpiper (DOE, 2015b)
Great knot	Conservation Advice <i>Calidris tenuirostris</i> Great knot (Threatened Species Scientific Committee, 2016a)
Red knot, knot	Conservation Advice <i>Calidris canutus</i> Red knot (Threatened Species Scientific Committee, 2016b)
Bar-tailed godwit (<i>menzbieri</i>)	Conservation Advice <i>Limosa lapponica menzbieri</i> Bar-tailed godwit (northern Siberia) (Threatened Species Scientific Committee, 2016c)
Greater sand plover	Conservation Advice <i>Charadrius leschenaultii</i> Greater sand plover (Threatened Species Scientific Committee, 2016d)
Lesser sand plover	Conservation Advice <i>Charadrius mongolus</i> Lesser sand plover (Threatened Species Scientific Committee, 2016e)

4. HABITAT AND BIOLOGICAL COMMUNITIES

4.1 Regional context

The NWMR habitats range from nearshore benthic primary producer habitats such as seagrass beds, coral communities and mangrove forests, to offshore soft sediment seabed habitats and submerged and emergent reef systems. These habitats support biological communities that range from low density sessile and mobile benthos, such as sponges, molluscs and echinoids (with noted areas of sponge hotspot diversity) in offshore soft sediment habitat (DSEWPAC, 2012a) to complex, diverse, remote coral reef systems.

Benthic primary producer habitats, such as seagrass beds, coral communities and mangrove forests within the SWMR, are described as a mixture of tropical and temperate species, due to the seasonal influences of the tropical waters carried south by the Leeuwin Current and the temperate waters carried north by the Capes Current (DSEWPAC, 2012b).

The NMR shares similar habitat types to the NWMR. The predominant habitat of the region includes soft muddy sediments on relatively flat terrain. Other habitat types include seagrasses, reefs, shoals and coastal habitats such as mangroves and coastal wetlands (Rochester *et al.*, 2007).

The summary of key habitats and biological communities provided in the following sub-sections is focused on the primary features of relevance to the activity areas within the NWMR – primarily the offshore habitats of the continental shelf and slope, submerged shoals and banks, and remote oceanic reef systems of recognised conservation value.

4.2 Biological Productivity of NWMR

Primary productivity of the NWMR is generally low and appears to be largely driven by offshore influences (Brewer *et al.*, 2007), with periodic upwelling events and cyclonic influences driving coastal productivity with nutrient recycling and advection. Seasonal weather patterns also influence the delivery of nutrients from deep-water to shallow water. Cyclones and north-westerly winds during the North-west monsoon (approximately November–March) and the strong offshore winds of the South-east monsoon (approximately April–September) facilitate the upwelling and mixing of nutrients from deep-water to shallow water environments (Brewer *et al.*, 2007).

The Indonesian Throughflow (ITF) has an important effect on productivity in the northern areas of the Region. Generally, its deep, warm and low nutrient waters suppress upwelling of deeper comparatively nutrient-rich waters, thereby forcing the highest rates of primary productivity to occur at depths associated with the thermocline. When the ITF is weaker, the thermocline lifts bringing deeper, more nutrient-rich waters into the photic zone and hence resulting in conditions favourable to increased productivity (DEWHA, 2007a). Similarly, the Leeuwin Current has a significant role in determining primary productivity in the southern areas of the NWMR. As with the ITF, the overlying warm oligotrophic waters of the Leeuwin Current suppress upwelling. A subsurface chlorophyll maximum is therefore formed at a depth in the water column where nutrients and light are sufficient for photosynthesis to proceed. Seasonal changes in the strength of the Leeuwin Current influence primary productivity levels and seasonal interactions between the Leeuwin and Ningaloo currents in the south of the NWMR are believed to be particularly important (DEWHA, 2007a).

Internal tides (defined as internal waves generated by the barotropic tide) are a striking characteristic of many parts of the NWMR and are associated with highly stratified water columns. Internal waves (solitons), which can raise cooler, generally more nutrient rich water higher in the water column, are generated between water depths of 400 m and 1000 m where bottom topography results in a significant change in water depth over a relatively short distance. Cyclones are episodic events in the NWMR that contribute to spikes in productivity through enrichment of surface water layers due to enhanced vertical mixing of the water column. Temporary increases in primary productivity as a result of cyclones generally last between one and two weeks, and it is believed that the impacts of

cyclones are generally limited to waters less than 100 m deep and affect benthic communities more substantially than pelagic systems (DEWHA, 2007a).

Water depth also has a significant overriding influence over productivity in the marine environment, due to its influence on light availability. This is reflected by distinct onshore and offshore assemblages of major pelagic groups of phytoplankton, microzooplankton, mesoplankton and ichthyoplankton. Productivity booms are thought to be triggered by seasonal changes to physical drivers or episodic events, as detailed above, which result in rapid increases in primary production over short periods, followed by extended periods of lower primary production. The trophic systems in the NWMR are able to take advantage of blooms in primary production, enabling nutrients generated to be used by different groups of consumers over long periods (DEWHA, 2007a).

Little detailed information is available about the trophic systems in the NWMR. The utilisation of available nutrients is thought to differ between pelagic and benthic environments, influenced by water depth and vertical migration of some species groups in the water column. In the pelagic system, it is thought that approximately half of the nutrients available are utilised by microzooplankton (e.g. protozoa) with the remainder going to macro/meso-zooplankton (e.g. copepods). As primary and secondary consumers, gelatinous zooplankton (e.g. salps, coelenterates) and jellyfish are thought to play an important role in the food web, contributing a significant proportion of biomass in the marine system during and for periods after booms in primary productivity. Salps are semi-transparent, barrel-shaped marine animals that can reproduce quickly in response to bursts in primary productivity and provide a food source for many pelagic fish species (DEWHA, 2007a).

4.3 Planktonic Communities in the NWMR

The NWMR has two distinct phytoplankton assemblages; a tropical oceanic community in offshore waters and a tropical shelf community confined to the NWS (Hallegraeff, 1995). MODIS (Moderate Resolution Imaging Spectrometer) satellite datasets from the NWMR indicates that chlorophyll (and thus phytoplankton) levels are low in summer months (December to March) and higher in the winter months (Schroeder *et al.*, 2009). Low chlorophyll levels during summer months may be a result of lower plankton productivity during the wet season or lower nutrient inputs from warm surface waters dominant during summer. However, it is likely that much of the primary production is taking place below the surface, where the MODIS imagery does not penetrate (Schroeder *et al.*, 2009). The winter months are relatively cloud free and surface chlorophyll is high throughout most of the region.

Zooplankton and may include organisms that complete their lifecycle as plankton (e.g. copepods, euphausiids) as well as larval stages of other taxa such as fishes, corals and molluscs. Peaks in zooplankton such as mass coral spawning events (typically in March and April) (Rosser and Gilmour, 2008) and fish larvae abundance (CALM, 2005a) can occur throughout the year. Spatial and temporal patterns in the distribution and abundance of macro-zooplankton on the North-west Shelf are influenced by sporadic climatic and oceanographic events, with large inter-annual changes in assemblages (Wilson *et al.*, 2003). Amphipods, euphausiids, copepods, mysids and cumaceans are among the most common components of the zooplankton in the region (Wilson *et al.*, 2003).

4.3.1 Browse

Phytoplankton within the Browse activity area is expected to reflect the conditions of the NWMR. There is a tendency for offshore phytoplankton communities in the NWMR to be characterised by smaller taxa (e.g. bacteria), whereas shelf waters are dominated by larger taxa such as diatoms (Hanson *et al.*, 2007).

Zooplankton within the activity area may include organisms that complete their lifecycle as plankton (e.g. copepods, euphausiids) as well as larval stages of other taxa such as fishes, corals and molluscs. Peaks in zooplankton such as mass coral spawning events (typically in March and April) (Rosser and Gilmour, 2008; Simpson *et al.*, 1993) and fish larvae abundance (CALM, 2005a) can occur throughout the year.

The influence of the Indonesian Throughflow restricts upwelling across the Kimberley System (approximately equates to the Browse activity area). However, small-scale topographically associated current movements and upwellings are thought to occur, which inject nutrients into specific locations within the system and result in 'productivity hot-spots'. Similarly, internal waves, generated at the shelf break (e.g. west of Browse Island and around submerged cliffs) play a role in making nutrients available in the photic zone. Productivity within shallow nearshore waters is driven primarily by tidal movement and terrestrial runoff whereby nutrients are mixed by tidal action and new inputs of organic matter come from the land.

4.3.2 North-west Shelf / Scarborough

Plankton communities within the NWS / Scarborough activity area are expected to reflect conditions of the NWMR. Within the Pilbara system of the NWMR (approximately equates to the NWS / Scarborough activity area). Internal tides along the NWS and Exmouth Plateau result in the drawing of deeper cooler waters into the photic zone, stirring up nutrients and triggering primary productivity. Broadly the greatest productivity within this sub-system is found around the 200 m isobath associated with the shelf break.

4.3.3 North-west Cape

Waters of the North-west Cape experience a relatively high diversity of phytoplankton groups including diatoms, coccolithophorids and dinoflagellates. During the warmer months blooms of *Trichodesmium* occur in the region, these have been observed particularly on the frontal systems around Point Murat (Heyward *et al.*, 2000).

Average Leeuwin Current phytoplankton biomass is characteristic of low productivity oceanic waters like the Indian, Pacific and Atlantic Oceans (Hanson *et al.*, 2005). However, the Canyons linking the Cuvier Abyssal Plain and Cape Range Peninsula KEF are connected to the Commonwealth waters adjacent to Ningaloo Reef, and may also have connections to Exmouth Plateau. The canyons are thought to interact with the Leeuwin Current to produce eddies inside the heads of the canyons, resulting in waters from the Antarctic intermediate water mass being drawn into shallower depths and onto the shelf (Brewer *et al.* 2007). These waters are cooler and richer in nutrients and strong internal tides may also aid upwelling at the canyon heads (Brewer *et al.* 2007). The narrow shelf width (about 10 kilometres) near the canyons facilitates nutrient upwelling and relatively high productivity. This high primary productivity leads to high densities of primary consumers, such as micro and macro-zooplankton, such as amphipods, copepods, mysids, cumaceans, euphausiids (Brewer *et al.*, 2007).

4.4 Habitats and Biological Communities in the NWMR

4.4.1 Offshore Habitats and Biological communities

The NWMR has a large area of continental shelf and continental slope, with a range of bathymetric features such as canyons, plateaus, terraces, ridges, reefs, banks and shoals. The marine environment in this region is typified by tropical to sub-tropical marine ecosystems with diverse habitats from soft sediments, canyons, remote coral reefs and limestone pavement.

The key habitats and biological communities representative of the broader NWMR are summarised in **Table 4-1**.

The key habitats and biological communities representative of the broader SWMR and NMR are summarised in **Table 4-2** and **Table 4-3**.

4.4.2 Shoreline habitats and biological communities

The NWMR encompasses offshore and coastal waters, islands and mainland shoreline habitats typified by mangroves, tidal flats, saltmarshes, sandy beaches, and smaller areas of rocky shores. Each of these shoreline types has the potential to support different flora and fauna assemblages due to the different physical factors (e.g. waves, tides, light, etc.) influencing the habitat.

The key shoreline habitats representative of the broader NWMR are summarised in **Table 4-1**.

The key shoreline habitats representative of the broader SWMR and NMR are summarised in **Table 4-2** and **Table 4-3**.

Table 4-1 Habitats and biological communities within the NWMR

Habitat/Community	Browse	NWS / Scarborough	North-west Cape	Reference
	Offshore habitats and biological communities			
Soft sediment with infauna	The offshore environment of the NWMR comprises predominately of seabed habitats dominated by soft sediments (sandy and muddy substrata with occasional patches of coarser sediments) and sparse benthic biota. The benthic communities inhabiting the predominantly soft, fine sediments of the offshore habitats are characterised by infauna such as polychaetes, and sessile and mobile epifauna such as crustacea (shrimp, crabs and squat lobsters) and echinoderms (starfish, cucumbers). The density of benthic fauna is typically lower in deep-sea sediment habitats (greater than 200 m) than in shallower coastal sediment habitats, but the diversity of communities may be similar.			Section 9
Soft sediment with hard substrate outcropping	A unique seafloor feature combining both soft sediment and hard substrates, including outcrops, terraces, continental slope, and escarpments. This habitat is found in offshore areas of the NWMR, often associated with key ecological features such as the Ancient coastline at 125 m depth contour KEF.			Section 9
Coral Reef	Ancient Coastline at 125 m Depth Contour KEF Continental Slope Demersal Fish Communities KEF Coral reef habitats within the NWMR have a high species diversity that includes corals, and associated reef species such as fishes, crustaceans, invertebrates, and algae. Coral reef habitats of the offshore environment of the NWMR include remote oceanic reef systems, large platform reefs, submerged banks and shoals.	Ancient Coastline at 125 m Depth Contour KEF Continental Slope Demersal Fish Communities KEF	Ancient Coastline at 125 m Depth Contour KEF Continental Slope Demersal Fish Communities KEF	Section 9
Seagrass and Macroalgae communities	Browse Island Scott Reef Seringapatam Reef Ashmore Reef Cartier Island Hibernia Reef Seagrass beds and benthic macroalgae reefs are a main food source for many marine species and also provide key habitats and nursery grounds (Heck Jr. <i>et al.</i> , 2003; Wilson <i>et al.</i> , 2010). In the northern half of Western Australia, these habitats are restricted to sheltered and shallow waters, including around offshore reef systems, due to large tidal movement, high turbidity, large seasonal freshwater run-off and cyclones.	Rowley Shoals (including Mermaid Reef, Clerke Reef, Imperieuse Reef) Glomar Shoal Rankin Bank	-	Section 10
Filter Feeders/ heterotrophic	Scott Reef Seringapatam Reef Ashmore Reef Filter feeder epifauna such as sponges, ascidians, soft corals and gorgonians are animals that feed by actively filtering suspended matter and food particles from water, by passing the water over specialised filtration structures (DEWHA, 2008). Filter feeders generally live in areas that have strong currents and hard substratum, often associated with deeper environments of the shoals and banks in the offshore NWMR.	Rowley Shoals (including; Mermaid Reef, Clerke Reef, Imperieuse Reef)		Section 10
	Lower outer reef slopes of the oceanic reef	Glomar Shoal Rankin Bank	Cape Range canyon system	Section 10

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Habitat/Community	Browse	NWS / Scarborough	North-west Cape	Reference
Sandy Beaches	systems such as Scott Reef Sandy beaches are dynamic environments, naturally fluctuating in response to external forcing factors (e.g. waves, currents, etc). Sandy beaches vary in length, width and gradient, and in sediment type, composition, and grain size throughout the NWMR, being found around islands and reefs in the offshore areas of the region.	Ancient coastline at 125 m depth contour KEF Browse Island Scott Reef (Sandy Islet) Ashmore Reef Cartier Island	Muiron Islands	Section 10
Nearshore/coastal habitats and biological communities				
Coral Reef	Coral reef habitats typically found in nearshore regions of the NWMR include the fringing reefs around coastal islands and the mainland shore. Kimberley East Holothuria and Long reefs Bonaparte and Buccaneer Archipelagos Montgomery Reef Adele complex (Beagle, Mavis, Albert, Churchill reefs, Adele Island)	Dampier Archipelago Montebello, Lowendal and Barrow Island Groups	Ningaloo Reef Exmouth Gulf Shark Bay	Section 10
Seagrass and Macroalgae communities	Seagrass beds and benthic macroalgae reefs are a main food source for many marine species and also provide key habitats and nursery grounds (Heck Jr. <i>et al.</i> , 2003; Wilson <i>et al.</i> , 2010). In the nearshore areas of the NWMR, these habitats are restricted to sheltered and shallow waters due to large tidal movement, high turbidity, large seasonal freshwater run-off and cyclones. These areas include in bays and sounds and around reef and island groups. King Sound	Roebuck Bay Dampier Archipelago Montebello, Lowendal and Barrow Island Groups	Ningaloo Reef Exmouth Gulf Shark Bay	Section 10
Filter Feeders/ heterotrophic	Filter feeder epifauna such as sponges, ascidians, soft corals and gorgonians are animals that feed by actively filtering suspended matter and food particles from water, by passing the water over specialised filtration structures (DEWHA, 2007a). Filter feeders generally live in areas that have strong currents and hard substratum. Conversely, higher diversity infauna are mainly associated with soft unconsolidated sediment and infauna communities are considered widespread and well represented along the continental shelf and upper slopes of the NWMR. In nearshore areas of the NWMR, these species are generally found around reef systems. -	Deeper habitats of Rankin Bank and Glomar Shoal	Deeper habitats of Ningaloo Reef and the protected sponge zone in the south	

Habitat/Community	Browse	NWS / Scarborough	North-west Cape	Reference
Mangroves	Mangroves grow in intertidal mud and sand, with specially adapted aerial roots (pneumatophores) that provide for gas exchange during low tide (McClatchie <i>et al.</i> , 2006). Mangrove forests can help stabilise coastal sediments, provide a nursery ground for many species of fish and crustacean, and provide shelter or nesting areas for seabirds (McClatchie <i>et al.</i> , 2006). Mangroves are confined to shoreline habitats, in nearshore areas of the NWMR. Dampier Peninsula (including Carnot Bay, Beagle Bay and Pender Bay)	Pilbara Coastline (including: Ashburton River Delta, Coolgra Landing, Yammadery Island and the Mangrove Islands) Montebello, Lowendal and Barrow Island Groups Roebuck Bay	Shark Bay Mangrove Bay, Cape Range Peninsula Exmouth Gulf	
Saltmarshes	Saltmarshes communities are confined to shoreline habitats and are typically dominated by dense stands of halophytic plants such as herbs, grasses, and low shrubs. The diversity of saltmarsh plant species increases with increasing latitude (in contrast to mangroves). The vegetation in these environments is essential to the stability of the saltmarsh, as they trap and bind sediments. The sediments are generally sandy silts and clays and can often have high organic material content. -	Eighty Mile Beach Roebuck Bay	Shark Bay	
Sandy Beaches	Sandy beaches are dynamic environments, naturally fluctuating in response to external forcing factors (e.g. waves, currents, etc). Sandy beaches vary in length, width and gradient, and in sediment type, composition, and grain size throughout the NWMR. Sandy beaches are important for both resident and migratory seabirds and shorebirds and can also provide an important habitat for turtle nesting and breeding. They are located along many coastlines of the nearshore environments of the NWMR. Cape Domett Lacrosse Island	Eighty Mile Beach Eco Beach Dampier Archipelago Inshore Pilbara Islands (Northern, Middle, and Southern)	Ningaloo coast Muiron Islands Exmouth Gulf	

Table 4-2 Habitats within the SWMR

Habitat/Community	Location
Offshore	
Soft sediment with infauna	Most of the SWMR seafloor is composed of soft unconsolidated sediments, but due to large variations in bathymetry there are marked differences in sedimentary composition and benthic assemblage structure across the region. Despite the prevalence of these habitats in the SWMR, very little is known about the composition or distribution of the region's sedimentary infauna (DEWHA, 2008b)
Soft sediment with hard substrate outcropping	A unique seafloor feature combining both soft sediment and hard substrates, including outcrops, terraces, continental slope, and escarpments. Perth Canyon Marine Park Ancient coastline at 90-120 m depth contour KEF Diamantina Fracture Zone Naturaliste Plateau
Coral Reef	To date, studies and understanding of the corals within the SWMR have concentrated on the shallow water areas in State Waters. Within the deeper Commonwealth waters of the SWMR little is known of the distribution of corals.
Filter Feeders/ heterotrophic	Filter feeder epifauna such as sponges, ascidians, soft corals and gorgonians are animals that feed by actively filtering suspended matter and food particles from water, by passing the water over specialised filtration structures (DEWR, 2007). Filter feeders generally inhabit deeper habitat (below the photic zone) that have strong currents and hard substratum Ancient coastline at 90-120 m depth Diamantina Fracture Zone Naturaliste Plateau Perth Canyon Marine Park South-west Corner Marine Park
Nearshore	
Coral Reef	The northern extent of the SWMR coincides loosely with the disappearance of abundant and diverse coral from coastal habitats. To the south of Shark Bay, abundant corals occur predominantly around offshore islands, with corals at inshore sites occurring in very isolated patches of non-reef coral communities, usually of reduced species richness. Houtman Abrolhos Islands Rottnest Island
Seagrass and Macroalgae communities	Within the SWMR, macroalgae and seagrass communities are noted for their extent, species richness and endemism. The clear waters of the region allow light to reach greater depths, with some species found at much greater depths than usual (down to 120 m) (DEWR, 2007). Of the known species there are more than 1000 species of macro-algae and 22 species of seagrass consisting of tropical and temperate species. Seagrass and macro-algae occur in areas with sheltered bays and in the inter-reef lagoons along exposed sections of the coast. Houtman Abrolhos Islands Jurien Marine Park Shoalwater Islands Marine Park Geographe Marine Park Cockburn Sound Rottnest Island
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Habitat/Community	Location
	<p>Commonwealth marine environment within and adjacent to the west-coast inshore lagoons KEF</p> <p>Commonwealth marine environment within and adjacent to Geographie Bay KEF</p> <p>Commonwealth marine environment surrounding the Recherche Archipelago KEF</p>
Filter Feeders/ heterotrophic	<p>Filter feeder epifauna such as sponges, ascidians, soft corals and gorgonians are animals that feed by actively filtering suspended matter and food particles from water, by passing the water over specialised filtration structures (DEWR, 2007). Filter feeders generally live in areas that have strong currents and hard substratum.</p>
Mangroves	<p>Houtman Abrolhos Islands</p> <p>Recherche Archipelago</p> <p>Mangroves grow in intertidal mud and sand, with specially adapted aerial roots (pneumatophores) that provide for gas exchange during low tide (McClatchie <i>et al.</i>, 2006). Mangrove forests can help stabilise coastal sediments, provide a nursery ground for many species of fish and crustacean, and provide shelter or nesting areas for seabirds (McClatchie <i>et al.</i>, 2006). Mangroves are confined to shoreline habitats, in nearshore areas of the SWMR.</p>
Sandy Beaches	<p>Houtman Abrolhos Islands</p> <p>Sandy beaches within the SWMR are important for both resident and migratory seabirds and shorebirds and can also host breeding populations of the Australian sea lion. They are found along many coastlines of the nearshore environments of the SWMR. In addition to this, beaches in the SWMR provide a variety of socio-economic values including tourism, commercial and recreational fishing, and support other recreational activities.</p> <p>Houtman Abrolhos Islands</p> <p>Marmion Marine Park</p> <p>Ngari Capes Marine Park</p> <p>Walpole and Normalup Inlets Marine Park</p>

Table 4-3 Habitats and Biological Communities within the NMR

Habitat/Community	Location
	Offshore habitats and biological communities
Soft sediment with infauna	Most of the offshore environment of the NMR is characterised by relatively flat expanses of soft sediment seabed. The soft sediments of the region are characterised by moderately abundant and diverse communities of infauna and mobile epifauna dominated by polychaetes, crustaceans, molluscs, and echinoderms.
Soft sediment with hard substrate outcropping	A unique seafloor feature combining both soft sediment and hard substrates, including outcrops, terraces, continental slope, and escarpments. The variability in substrate composition may contribute to the presence of unique ecosystems. Species present include sponges, soft corals and other sessile filter feeders associated with hard substrate sediments. Carbonate bank and terrace system of the Van Diemen Rise KEF Pinnacles of the Bonaparte Basin KEF
Coral Reef	Offshore coral reefs within the NMR is generally associated with a series of submerged shoals and banks. The shoals/banks in the region support tropical marine biota consistent with that found on emergent reef systems of the Indo West Pacific region such as Ashmore Reef, Cartier Island, Seringapatam Reef and Scott Reef (Heyward <i>et al.</i> , 1997) Pinnacles of the Bonaparte Basin KEF Evans Shoal Tassie Shoal Blackwood Shoal
Filter Feeders/ heterotrophic	Filter feeder epifauna such as sponges, ascidians, soft corals and gorgonians are animals that feed by actively filtering suspended matter and food particles from water, by passing the water over specialised filtration structures (DEWHA, 2007b). Filter feeders generally live in areas that have strong currents and hard substratum and typically associated with the deeper habitats of the submerged shoals and banks, and canyon features. Carbonate bank and terrace system of the Van Diemen Rise KEF Pinnacles of the Bonaparte Basin KEF Tributary Canyons of the Arafura Depression KEF Evans Shoal Tassie Shoal Goodrich Bank
	Nearshore
Coral Reef	Within the NMR corals occur both as reefs and in non-reef coral communities. Nearshore reefs include patch reefs and fringing reefs sparsely distributed within the region. Coral reefs within the NMR provides breeding and aggregation areas for many fish species including mackerel and snapper and offer refuges for sea snakes and apex predators such as sharks. Submerged coral reefs of the Gulf of Carpentaria KEF Darwin Harbour
Seagrass and Macroalgae communities	Seagrasses provide key habitats in the NMR. They stabilise coastal sediments and trap and recycle nutrients. They provide nursery grounds for commercially harvested fish and prawns and provide feeding grounds for dugongs and green turtles. Seagrass distribution in the region is largely associated with sheltered small bays and inlets including shallow waters surrounding inshore islands. Field Island The mainland coastline adjacent to Kakadu National Park
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Habitat/Community	Location
Filter Feeders/ heterotrophic	Filter feeder epifauna such as sponges, ascidians, soft corals, and gorgonians are animals that feed by actively filtering suspended matter and food particles from water, by passing the water over specialised filtration structures (DEWHA, 2007b). Filter feeders generally live in areas that have strong currents and hard substratum.
Mangroves	Cape Helveticus Mangroves grow in intertidal mud and sand, with specially adapted aerial roots (pneumatophores) that provide for gas exchange during low tide (McClatchie <i>et al.</i> , 2006). Mangroves provide habitat for waterbirds and support many commercially and recreationally important fish and crustacean species for parts of their life cycles. They buffer the coast from large tidal movements, storm surges and flooding. Tiwi Islands Darwin Harbour The mainland coastline adjacent to the Daly River
Sandy Beaches	Sandy beaches vary in length, width and gradient, and in sediment type, composition, and grain size throughout the NMR and are important for both resident and migratory seabirds and shorebirds. Sandy beaches can also provide an important habitat for turtle nesting. They are located along many coastlines of the nearshore environments of the islands and mainland shores of the NMR. Tiwi Islands Cobourg Peninsula Joseph Bonaparte Gulf

5. FISHES, SHARKS AND RAYS

5.1 Regional Context

Western Australian waters provide important habitat for listed fishes, sharks, and rays including areas that support key life stages such as breeding, foraging, and migration routes for fish species. Pelagic and demersal fishes occupy a range of habitats throughout each of the regions, from coral reefs to open offshore waters, and are an extremely important component of ecosystems, providing a link between primary production and higher predators, with many species being of conservation value and important for commercial and recreational fishing.

The fish fauna in the NWMR is diverse. Of the approximately 500 shark species found worldwide, 94 are found in the region (DEWHA, 2008). Approximately 54 species of syngnathids (seahorses, seadragons, pipehorses and pipefishes) and one species of solenostomids (ghostpipefishes) are also known to occur in the NWMR or adjacent State waters (DSEWPAC, 2012a).

The fish fauna of the SWMR includes more than 900 species occupying a large variety of habitats. However, only three species of bony fishes known to occur in the region are listed under the EPBC Act as threatened or marine species, and seven listed species of shark (DSEWPAC, 2012b).

The NMR is considered an important area for the sawfish and river shark species group, with five species of sawfishes and river sharks listed under the EPBC Act known to occur in the region (DSEWPAC, 2012c). Approximately 28 species of syngnathids and two species of solenostomids are listed marine and known to occur in the NMR, however there is a paucity of knowledge on the distribution, relative abundance and habitats of these species in the region (DEWHA, 2008).

The following sections focus on the fish species (including sharks and rays) listed as threatened or migratory that are known to occur within the NWMR. In addition, listed, conservation dependent fish and shark species for the NWMR are described. A detailed account of commercial and recreational fisheries that operate in the region is provided in **Section 11**.

Table 5-1 outlines the threatened and migratory fish species that may occur within the NWMR, with their conservation status and relevant recovery plans and/or conservation advice. **Table 5-2** provides information for species of fish that are listed as conservation dependent that may occur within the NWMR, NMR and SWMR. Note that currently there are no approved Conservation Advices in place for any of these five species.

Table 5-1 Fish species (including sharks and rays) identified by the EPBC Act PMST for the NWMR

Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
<i>Rhincodon typus</i>	Whale shark	Vulnerable	Migratory	Marine	Other specially protected fauna	Conservation Advice <i>Rhincodon typus</i> whale shark. (Threatened Species Scientific Committee, 2015d)	
<i>Carcharias taurus</i>	Grey nurse shark (west coast population)	Vulnerable	N/A	Marine	Vulnerable	Recovery Plan for the Grey Nurse Shark (<i>Carcharias taurus</i>) (DOE, 2014a)	
<i>Carcharodon carcharias</i>	White shark	Vulnerable	Migratory	Marine	Vulnerable	Recovery Plan for the White Shark (<i>Carcharodon carcharias</i>) (DSEWPAC, 2013b)	
<i>Isurus oxyrinchus</i>	Shortfin mako	N/A	Migratory	Marine	N/A	N/A	
<i>Isurus paucus</i>	Longfin mako	N/A	Migratory	Marine	N/A	N/A	
<i>Lamna nasus</i>	Porbeagle shark Mackerel shark	N/A	Migratory	Marine	N/A	N/A	
<i>Carcharhinus longimanus</i>	Oceanic whitetip shark	N/A	Migratory	Marine	N/A	N/A	
<i>Anoxypristis cuspidata</i>	Narrow sawfish	N/A	Migratory	Marine	N/A	N/A	
<i>Pristis clavata</i>	Dwarf sawfish	Vulnerable	Migratory	Marine	Priority	Sawfish and River Sharks Multispecies Recovery Plan (Commonwealth of Australia, 2015b)	
<i>Pristis pristis</i>	Largetooth (Freshwater) sawfish	Vulnerable	Migratory	Marine	Priority		
<i>Pristis zijsron</i>	Green sawfish	Vulnerable	Migratory	Marine	Vulnerable		
<i>Glyphis garricki</i>	Northern river shark	Endangered	N/A	Marine	Priority		
<i>Manta alfredi</i>	Reef manta ray	N/A	Migratory	Marine	N/A	N/A	
<i>Manta birostris</i>	Giant manta ray	N/A	Migratory	Marine	N/A	N/A	

Table 5-2 EPBC Act listed Conservation Dependent species of fishes and sharks that may occur in the NWMR, NMR and SWMR

Species Name	Common Name	Likely Occurrence / Distribution	Listing Advice
<i>Hoplostethus atlanticus</i>	Orange roughy, Deep-sea perch, Red roughy	SWMR	No conservation listing advice for this species. Refer to the Marine bioregional plan for the SWMR (DSEWPAC, 2012b) for further information
<i>Thunnus maccoyii</i>	Southern bluefin tuna	NWMR and SWMR	Threatened Species Scientific Committee (2010)
<i>Sphyrna lewini</i>	Scalloped hammerhead	NWMR, NMR and SWMR	Threatened Species Scientific Committee (2018)
<i>Centrophorus zeehaani</i>	Southern dogfish, Endeavour dogfish, Little gulper shark	SWMR	Threatened Species Scientific Committee (2013)
<i>Galeorhinus galeus</i>	School shark, Eastern school shark, Snapper shark, Tope, Soupfin shark	SWMR	Threatened Species Scientific Committee (2009)

5.2 Protected Sharks, Sawfishes and Rays in the NWMR

The EPBC Act Protected Matters search (**Appendix A**) identified seven species of shark and five species of river shark or sawfish listed as threatened and/or migratory within the NWMR. In addition, two species of ray (the reef manta ray and giant manta ray) are listed as migratory within the region (refer **Table 5-2**).

5.2.1 Sharks and Sawfishes

The shark species known to occur within the NWMR include: the whale shark, grey nurse shark, white shark, shortfin mako, and longfin mako (**Table 5-2**).

Five species of river shark or sawfish known to occur in the NWMR and include: the narrow sawfish, northern river shark, freshwater sawfish, green sawfish and dwarf sawfish (**Table 5-2**).

There are identified BIAs within the NWMR for the whale shark, freshwater sawfish, green sawfish, and dwarf sawfish (refer **Section 5.3.2**).

Table 5-2 Information on the threatened shark and sawfish species within the NWMR

Species	Preferred Habitat and Diet	Habitat Location
Whale shark	Preferred habitat: They have a widespread distribution in tropical and warm temperate seas, both oceanic and coastal (Last and Stevens, 2009). The species is widely distributed in Australian waters. Diet: Whale sharks are planktivorous sharks and feed on a variety of planktonic organisms including krill, jellyfish, and crab larvae (Last and Stevens, 2009).	Ningaloo Reef is the main known aggregation site for whale sharks in Australian waters and has the largest density of whale sharks per kilometre in the world (Martin, 2007). Refer Table 5-3 for the BIA summary for the whale shark.
Grey nurse shark (west coast population)	Preferred habitat: Most commonly found in temperate waters on, or close to, the bottom of the continental shelf, from close inshore to depths of about 200 m (McAuley, 2004). Diet: A variety of teleost and elasmobranch fishes and some cephalopods (Gelsleichter <i>et al.</i> , 1999; Smale, 2005).	Details of movement patterns of the western sub-population are unclear (McAuley, 2004) and key aggregation sites have not been formally identified within the NWMR (Chidlow <i>et al.</i> , 2006). The NWMR represents the northern limit of the west coast population.

Species	Preferred Habitat and Diet	Habitat Location
White shark	<p>Preferred habitat: The species typically occurs in temperate coastal waters between the shore and the 100 m depth contour; however, adults and juveniles have been recorded diving to depths of 1000 m (Bruce <i>et al.</i>, 2006; Bruce, 2008).</p> <p>Diet: Smaller white sharks (less than 3 m in length) feed primarily on teleost and elasmobranch fishes, broadening their diet as larger sharks to include marine mammals (Last and Stevens, 2009).</p>	<p>There are no known aggregation sites for white sharks in the NWMR, and this species is most often found south of North-west Cape, in low densities (DSEWPAC, 2012a).</p> <p>Given the migratory nature of the species, most likely has a broad distribution within the NWMR. No BIAs identified for NWMR.</p>
Shortfin mako	<p>Preferred habitat: The shortfin mako shark is a pelagic species with a circumglobal, wide-ranging oceanic distribution in tropical and temperate seas (Mollet <i>et al.</i>, 2000). Tagging studies indicate shortfin makos spend most of their time in water less than 50 m deep but with occasional dives up to 880 m (Abascal <i>et al.</i>, 2011; Stevens <i>et al.</i>, 2010).</p> <p>Diet: Feeds on a variety of prey, such as teleost fishes, other sharks, marine mammals, and marine turtles (Campana <i>et al.</i>, 2005).</p>	<p>Given the migratory nature of the species, most likely has a broad distribution within the NWMR. No BIAs identified for NWMR.</p>
Longfin mako	<p>Preferred habitat: A pelagic species with a wide-ranging oceanic distribution in tropical and temperate seas (Mollet <i>et al.</i>, 2000).</p> <p>Diet: Primarily teleost fishes and cephalopods (primarily squid) (Last and Stevens, 2009).</p>	<p>Records on longfin mako sharks are sporadic and their complete geographic range is not well known (Reardon <i>et al.</i>, 2006).</p> <p>Given the migratory nature of the species, most likely has a broad distribution within the NWMR. No BIAs identified for NWMR.</p>
Mackerel/Porbeagle shark	<p>Preferred habitat: The porbeagle shark primarily inhabits offshore waters around the edge of the continental shelf. They occasionally move into coastal waters, but these movements are temporary (Campana and Joyce, 2004; Francis <i>et al.</i>, 2002). The porbeagle shark is known to dive to depths exceeding 1300 m (Campana <i>et al.</i>, 2010; Saunders <i>et al.</i>, 2011).</p> <p>Diet: Primarily teleost fish, elasmobranchs, and cephalopods (primarily squid) (Joyce <i>et al.</i>, 2002; Last and Stevens, 2009).</p>	<p>In Australia, the species occurs in waters from southern Queensland to south-west Australia (Last and Stevens, 2009). Distribution within the NWMR is unknown, but there are several records for this species on the NWS in the Atlas of Living Australia (ALA).</p>
Oceanic whitetip shark	<p>Preferred habitat: The oceanic whitetip shark is globally distributed in warm-temperate and tropical oceans (Andrzejczek <i>et al.</i>, 2018). The species may occur in tropical and sub-tropical offshore and coastal waters around Australia. They primarily occupy pelagic waters in the upper 200 m of the water column; however, they have been observed diving to depths of around 1000 m, potentially associated with foraging behaviour (Howey-Jordan <i>et al.</i>, 2013; D'Alberto <i>et al.</i>, 2017). The species is highly migratory, travelling large distances between shallow reef habitats in coastal waters and oceanic waters (Howey-Jordan <i>et al.</i>, 2013). The species does exhibit a strong preference for warm and shallow waters above 120 m.</p> <p>Diet: Opportunistic feeders and generally target a variety of finfishes and pelagic squid, depending on habitat. Target pelagics such as tuna in open ocean as noted by the large bycatch numbers in the long line fisheries.</p>	<p>Given the migratory nature of the species, most likely has a broad distribution within the NWMR. No BIAs identified for NWMR.</p>

Species	Preferred Habitat and Diet	Habitat Location
Narrow sawfish	Preferred habitat ¹ : Shallow coastal, estuarine, and riverine habitats, however it may occur in waters up to 40 m deep (D'Anastasi <i>et al.</i> , 2013). Diet: Shoaling fishes, such as mullet, as well as molluscs and small crustaceans (Cliff and Wilson, 1994).	Shallow coastal waters of the Pilbara and Kimberly coasts (Last and Stevens, 2009).
Northern river shark	Preferred habitat ¹ : Rivers, tidal sections of large tropical estuarine systems and macrotidal embayments, as well as inshore and offshore marine habitats (Pillans <i>et al.</i> , 2009; Thorburn and Morgan, 2004). Adults have been recorded only in marine environments. Juveniles and sub-adults have been recorded in freshwater, estuarine and marine environments (Pillans <i>et al.</i> , 2009). Diet: Variety of fish and crustaceans (Stevens <i>et al.</i> , 2005)	Within the NWMR records have come from both the west and east Kimberley, including King Sound, the Ord and King rivers, West Arm of Cambridge Gulf and also from Joseph Bonaparte Gulf (Thorburn and Morgan, 2004; Stevens <i>et al.</i> , 2005; Thorburn, 2006; Field <i>et al.</i> , 2008; Pillans <i>et al.</i> , 2008, Whitty <i>et al.</i> , 2008; Wynen <i>et al.</i> , 2008).
Large-tooth (Freshwater) sawfish	Preferred habitat: Sandy or muddy bottoms of shallow coastal waters, estuaries, river mouths and freshwater rivers, and isolated water holes. Diet: Shoaling fishes, such as mullet, as well as molluscs and small crustaceans (Cliff and Wilson, 1994).	Refer Table 5-3 for the BIA summary for the freshwater sawfish.
Green sawfish	Preferred habitat ¹ : Inshore coastal environments including estuaries, river mouths, embayments, and along sandy and muddy beaches, as well as offshore marine habitat (Stevens <i>et al.</i> , 2005; Thorburn <i>et al.</i> , 2003). Diet: Schools of baitfish and prawns (Pogonoski <i>et al.</i> , 2002), molluscs and small crustaceans (Cliff and Wilson, 1994).	Refer Table 5-3 for the BIA summary for the green sawfish.
Dwarf sawfish	Preferred habitat ¹ : Shallow (2 to 3 m) silty coastal waters and estuarine habitats, occupying relatively restricted areas and moving only small distances (Stevens <i>et al.</i> , 2008) Diet: Shoaling fish such as mullet, molluscs, and small crustaceans (Cliff and Wilson, 1994).	Refer Table 5-3 for the BIA summary for the dwarf sawfish.

¹ Preferred habitat as described within the Sawfish and River Sharks Multispecies Recovery Plan (Commonwealth of Australia, 2015b).

5.2.2 Rays

Rays are commonly found in the NWMR. Two listed and migratory species of ray known to occur within the NWMR: the reef manta ray and giant manta ray.

No BIAs for either the reef or giant manta ray species have been identified in the NWMR.

Table 5-3 Information on migratory ray species within the NWMR

Species	Preferred Habitat and Diet	Habitat Location
Reef manta ray	Preferred habitat: The reef manta ray is commonly sighted within productive nearshore environments, such as island groups, atolls or continental coastlines. However, the species has also been recorded at offshore coral reefs, rocky reefs, and seamounts (Marshall <i>et al.</i> , 2009). Diet: Feed on planktonic organisms including krill and crab larvae.	A resident population of reef manta rays has been recorded at Ningaloo Reef. No BIAs identified for NWMR.
Giant manta ray	Preferred habitat: The species primarily inhabits near-shore environments along productive coastlines with regular upwelling, but they appear	The Ningaloo Coast is an important area for giant manta rays from March to August (Preen <i>et al.</i> , 1997).

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Species	Preferred Habitat and Diet	Habitat Location
	to be seasonal visitors to coastal or offshore sites including offshore island groups, offshore pinnacles and seamounts (Marshall <i>et al.</i> , 2011). Diet: Feed on planktonic organisms including krill and crab larvae.	No BIAs identified for NWMR.

5.3 Fish, Shark and Sawfish Biological Important Areas in the NWMR

A review of the National Conservation Values Atlas identified Biologically Important Areas (BIAs) for four species of shark and sawfish (whale shark, freshwater sawfish, green sawfish and dwarf sawfish) within the NWMR. The BIAs for the whale shark and the sawfish species include foraging, nursing and pupping areas. These are described in **Table 5-4**.

Table 5-4 Fish, whale shark and sawfish BIAs within the NWMR

Species	Woodside Activity Area			BIAs		
	Browse	NWS/S	NWC	Pupping	Nursing	Foraging
Whale shark	✓	✓	✓	No pupping BIA identified within the NWMR	No nursing BIA identified within the NWMR	Foraging (high density) in Ningaloo Marine Park and adjacent Commonwealth waters (March–July) Foraging northward from Ningaloo along the 200 m isobath (July – Nov).
Green sawfish	✓	✓	-	Pupping in Cape Keraudren (pupping occurs in summer in a narrow area adjacent to shoreline) Pupping in Willie Creek Pupping in Roebuck Bay Pupping in Cape Leveque Pupping in waters adjacent to Eighty Mile Beach Pupping (likely) in Camden Sound.	Nursing in Cape Keraudren Nursing in waters adjacent to Eighty Mile Beach	Foraging in Cape Keraudren Foraging in Roebuck Bay Foraging in Cape Leveque Foraging in Camden Sound
Largeetooth (freshwater) sawfish	✓	✓	-	Pupping in the mouth of the Fitzroy River (January to May) Roebuck Bay (Jan – May) Pupping likely in waters adjacent to Eighty Mile Beach	Nursing (likely) in King Sound Roebuck Bay (Jan – May)	Foraging in the mouth of the Fitzroy River (January to May) Foraging in King Sound Roebuck Bay (Jan – May) Foraging in waters adjacent to Eighty Mile Beach
Dwarf sawfish	✓	✓	-	Pupping in King Sound Pupping in waters adjacent to Eighty Mile Beach	Nursing in King Sound Nursing waters adjacent to Eighty Mile Beach	Foraging in King Sound Foraging in Camden Sound Foraging in waters adjacent to Eighty Mile Beach

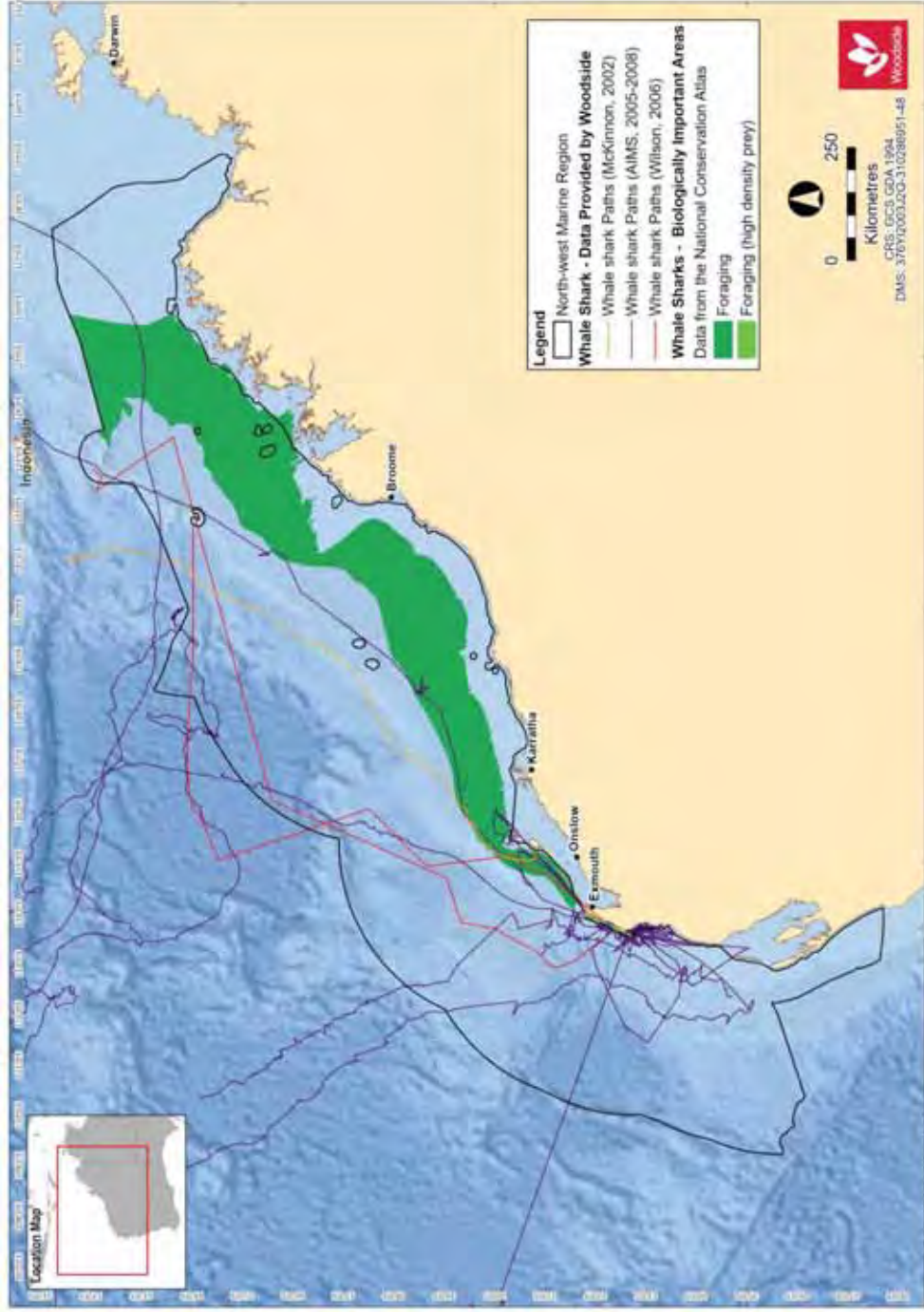


Figure 5-1 Whale shark BIAs for the NWMR and tagged whale shark tracks

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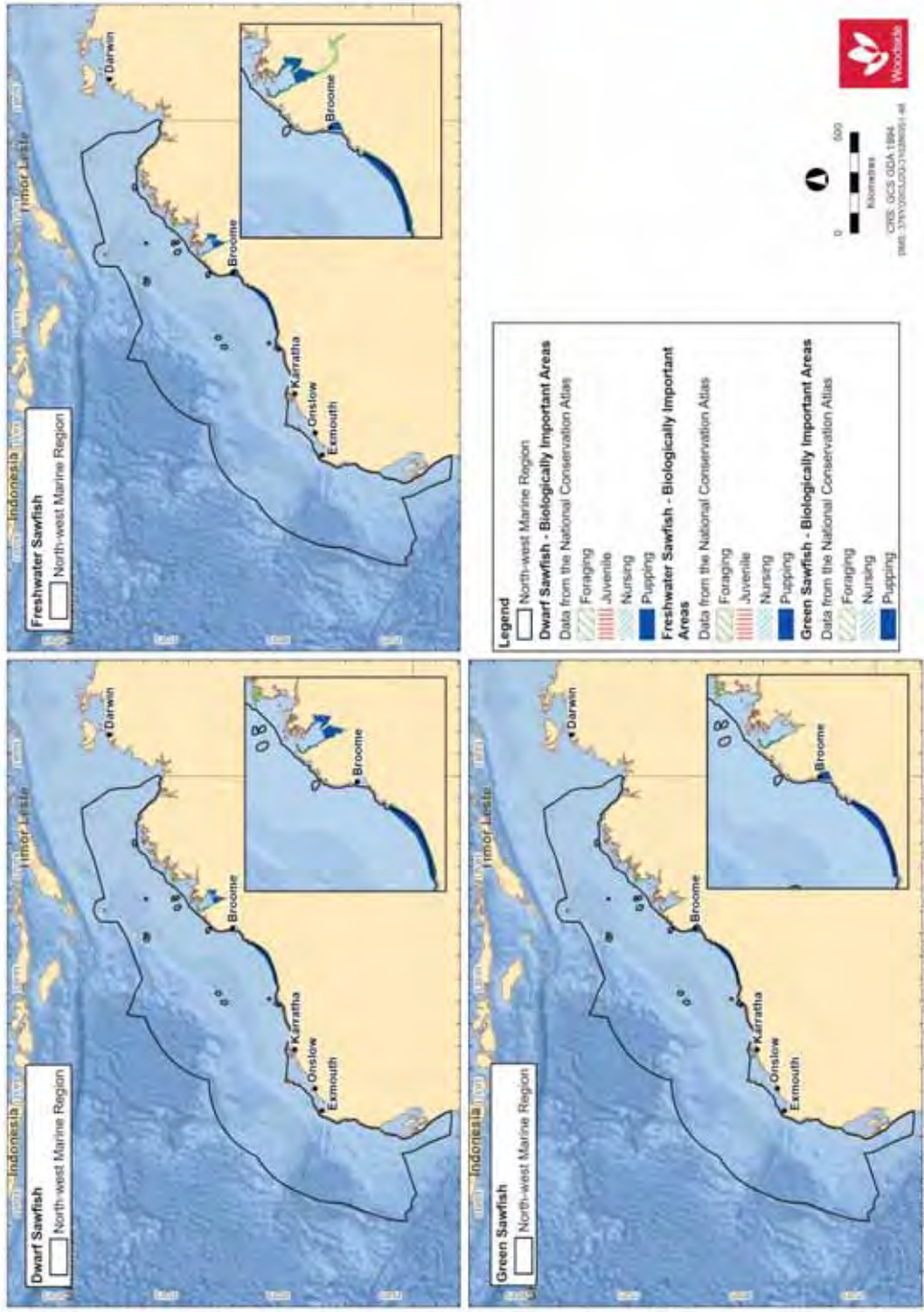


Figure 5-2 Sawfish BIAs for the NWMR

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5.4 Fish Assemblages of the NWMR

5.4.1 Regional Context for Fish Assemblages of NWMR

The NWMR contains a diverse range of fishes of tropical Indo-west Pacific affinity (Allen *et al.*, 1988). The region is characterised by the highest level of endemism and species diversity compared with other areas of the Australian continental slope. Last *et al.* (2005) recorded 1431 species from the three bioregions encompassing the continental slope, whilst also acknowledging some information gaps.

The NWMR is known for its demersal slope fish assemblages; the continental slope of the Timor Province and the North-west Transition supports more than 418 and 505 species of demersal fishes respectively, of which 64 are considered to be endemic. This is the second richest area for demersal fish species across the entire Australian continental slope. Conversely, the broad Southern Province, which covers most of southern Australia, supports 463 species, only 26 possibly being endemic. The continental slope demersal fish assemblages of the NWMR have been identified as a KEF (DEWHA, 2008), as described in **Section 9**.

The NWMR also features a diversity of pelagic fishes (those living in the pelagic zone) and benthopelagic fishes, including tuna, billfish, bramids, lutjanids, serranids and some sharks (DEWHA, 2007a). These species feed on salps and jellyfish, and more often on secondary consumers such as squid and bait fish. Water depth provides an indication of the level of interaction between pelagic and benthic communities within the NWMR; in waters deeper than 1000 m, for instance, the trophic system is pelagically-driven and benthic communities rely on particulates that fall to the seafloor (DEWHA, 2007a).

Pelagic fishes play an important ecological role within the NWMR; small pelagic fishes, such as lantern fish, inhabit a range of marine environments, including inshore and continental shelf waters and form a vital link in and between many of the region's trophic systems, feeding on pelagic phytoplankton and zooplankton and providing a food source for a wide variety of predators including large pelagic fishes, sharks, seabirds and marine mammals (Bulman, 2006; Mackie *et al.*, 2007). Large pelagic fishes, such as tuna, mackerel, swordfish, sailfish and marlin, are found mainly in oceanic waters and occasionally on the continental shelf (Brewer *et al.*, 2007). Both juvenile and adult phases of the large pelagic species are highly mobile and have a wide geographic distribution, although the juveniles more frequently inhabit warmer or coastal waters (DEWHA, 2008).

5.4.2 Listed Fish Species in the NWMR

The family Syngnathidae is a group of bony fishes that includes seahorses, pipefishes, pipehorses and seadragons. Along with syngnathids, members of the related Solenostomidae family (ghost pipefishes) are also found in the NWMR (DSEWPAC, 2012a).

There are 44 solenostomid and syngnathid species that are listed marine species that may occur within the NWMR, although no species is currently listed as threatened or migratory, according to the PMST report (**Appendix A**).

Syngnathids live in nearshore and inner shelf habitats, usually in shallow coastal waters, among seagrasses, mangroves, coral reefs, macroalgae dominated reefs, and sand or rubble habitats (Dawson, 1985; Lourie *et al.*, 1999, Lourie *et al.*, 2004; Vincent, 1996). Two species, the winged seahorse (*Hippocampus alatus*) and western pipehorse (*Solegnathus sp. 2*) have been identified in deeper waters of the NWMR (up to 200 m) (DSEWPAC, 2012a), however, these species were not identified by the Protected Matters search of the NWMR.

Knowledge about the distribution, abundance and ecology of both syngnathids and solenostomids in the NWMR is limited. No BIAs for syngnathids and solenostomids have been identified in the NWMR.

5.4.3 Browse

The proposed Browse activity area includes biologically important habitat for the whale shark and three sawfish species:

- whale shark (foraging northward from Ningaloo along the 200 m isobath (July – Nov),
- freshwater sawfish (pupping, nursing and foraging areas),
- green sawfish (pupping, nursing and foraging areas); and
- dwarf sawfish (pupping, nursing and foraging areas).

BIAs for the shark and sawfish species are outlined in **Table 5-4** and **Figure 5-1**.

The proposed Browse activity area has partial overlap with the Continental slope demersal fish communities KEF.

5.4.4 NWS / Scarborough

The NWS / Scarborough activity area includes biologically important habitat for the whale shark and three sawfish species:

- whale shark (foraging northward from Ningaloo along the 200 m isobath (July – Nov),
- freshwater sawfish (pupping, nursing and foraging areas),
- green sawfish (pupping, nursing and foraging areas); and
- dwarf sawfish (pupping, nursing and foraging areas).

BIAs for the whale shark and sawfish species are outlined in **Table 5-4** and **Figure 5-1**.

The NWS / Scarborough activity area has partial overlap with the Continental slope demersal fish communities KEF. The continental slope between North-west Cape and the Montebello Trough has more than 500 fish species, 76 of which are endemic, which makes it the most diverse slope bioregion in Australia (Last *et al.*, 2005).

5.4.5 North-west Cape

The North-west Cape activity area includes biologically important foraging habitat for the whale shark:

- whale shark, including:
 - Foraging (high density) in Ningaloo Marine Park and adjacent Commonwealth waters (March–July); and
 - Foraging northward from Ningaloo along the 200 m isobath (July – Nov).

BIAs for the whale shark are outlined in **Table 5-4** and **Figure 5-1**.

The North-west Cape activity area coincides with part of the Continental slope demersal fish communities KEF.

6. MARINE REPTILES

6.1 Regional Context for Marine Reptiles

The NWMR contains important habitat for listed marine reptiles, including areas that support key life stages such as nesting, internesting, migration and foraging for marine turtle species, and habitats supporting resident sea snake and crocodile populations.

Six of the seven marine turtle species occur in Australian waters, and all six (the green turtle, hawksbill turtle, loggerhead turtle, flatback turtle, leatherback turtle and olive ridley turtle) occur in the NWMR and NMR.

There are 25 listed species of sea snake reported within or adjacent to the NWMR (Guinea, 2007a; Udyawer *et al.*, 2016), of which four are endemic to reef habitats in the remote parts of the region. Nineteen (19) listed sea snake species are known to occur in the NMR, as reported in the Protected Matters search (**Appendix A**).

There are significantly fewer marine reptile species that frequently occur within the SWMR and presently include three species of listed marine turtle and one sea snake species. Other species of sea snake may occur because of the southward-flowing Leeuwin Current, as vagrants in the region (DSEWPAC, 2012b).

The following sections focus on the listed marine reptile species known to occur within the NWMR.

Table 6-1 outlines the threatened and migratory marine reptile species that occur within the NWMR, with their conservation status and relevant recovery plans and/or conservation advice.

Table 6-1 Marine reptile species identified by the EPBC Act PMST as potentially occurring within or utilising habitats in the NWMR for key life cycle stages

Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
<i>Caretta caretta</i>	Loggerhead turtle	Endangered	Migratory	Marine	Endangered		
<i>Chelonia mydas</i>	Green turtle	Vulnerable	Migratory	Marine	Vulnerable		
<i>Dermochelys coriacea</i>	Leatherback turtle	Endangered	Migratory	Marine	Vulnerable		
<i>Eretmochelys imbricata</i>	Hawksbill turtle	Vulnerable	Migratory	Marine	Vulnerable		Recovery Plan for Marine Turtles in Australia 2017-2027 (Commonwealth of Australia, 2017)
<i>Natator depressus</i>	Flatback turtle	Vulnerable	Migratory	Marine	Vulnerable		
<i>Lepidochelys olivacea</i>	Olive ridley turtle	Endangered	Migratory	Marine	Vulnerable		
<i>Aipysurus apraefrontalis</i>	Short-nosed sea snake	Critically endangered	N/A	Marine	Critically endangered		Approved Conservation Advice for <i>Aipysurus apraefrontalis</i> (Short-nosed Sea Snake) (DSEWPAC, 2011a)
<i>Aipysurus foliosquama</i>	Leaf-scaled sea snake	Critically endangered	N/A	Marine	Critically endangered		Approved Conservation Advice for <i>Aipysurus foliosquama</i> (Leaf-scaled Sea Snake) (DSEWPAC, 2011b)
<i>Crocodylus porosus</i>	Salt-water crocodile	N/A	Migratory	Marine	Other protected fauna		N/A

6.2 Marine Turtles in the NWMR

According to the Protected Matters search (**Appendix A**) six species of marine turtle known to occur within the NWMR are listed as threatened and migratory (three Vulnerable and three Endangered) under the EPBC Act—the green (*Chelonia mydas*), hawksbill (*Eretmochelys imbricata*), flatback (*Natator depressus*), loggerhead (*Caretta caretta*), leatherback (*Dermochelys coriacea*) and olive ridley (*Lepidochelys olivacea*) turtle (DSEWPAC, 2012a) (refer **Table 6-1**).

The NWMR supports globally significant breeding populations of four marine turtle species: the green, hawksbill, flatback and loggerhead turtle. Olive ridley turtles are known to forage within the NWMR, but there are only occasional records of the species nesting in the region. Leatherback turtles regularly forage over Australian continental shelf waters within the NWMR but there are also no records of the species nesting in the region (DSEWPAC, 2012a).

The six marine turtle species reported for the NWMR also occur within the NMR.

Three marine turtle species; the green, loggerhead, and leatherback turtle, have presumed feeding areas within the SWMR; however, no known nesting areas exist within the region (DSEWPAC, 2012b).

Discrete genetic stocks have evolved within each marine turtle species. This is the result of marine turtles returning to the location where they hatched. These genetically distinct stocks are defined by the presence of regional breeding aggregations. Stocks are composed of multiple rookeries in a region and are delineated by where there is little or no migration of individuals between nesting areas. Turtles from different stocks typically overlap at feeding grounds (Commonwealth of Australia, 2017). There are 17 genetic stocks across both the NWMR and NMR (nine in the NWMR, six in the NMR, and two overlapping both regions). Of these 17 genetic stocks, nine are known to occur within Woodside's three areas of activity (**Table 6-2**).

6.2.1 Life Cycle Stages

Marine turtles are highly migratory during non-reproductive life phases and have high site fidelity during breeding and nesting life phases. Majority of their lives are spent in the ocean, but the adult female marine turtles will come ashore to lay eggs in the sand above the high water mark on natal beaches (Commonwealth of Australia, 2017). **Figure 6-1** summarises the generalised life cycle of marine turtles. Species-specific life cycle information is outlined within the Recovery Plan for Marine Turtles of Australia (Commonwealth of Australia, 2017).

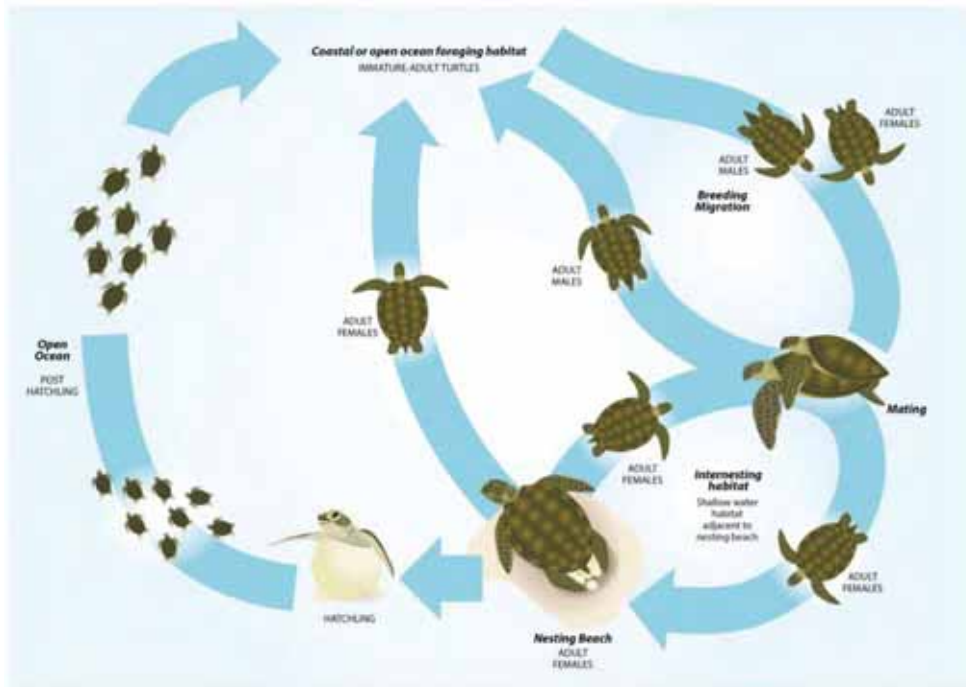


Figure 6-1 Generalised life cycle of marine turtles (Commonwealth of Australia, 2017)

6.2.2 Habitat Critical to Survival for Marine Turtles in the NWMR

The Recovery Plan for Marine Turtles of Australia (Commonwealth of Australia, 2017) identifies habitat critical to the survival of a species for marine turtle stocks under the EPBC Act. Habitat critical to survival is defined by the EPBC Act *Significant Impact Guidelines 1.1 – Matters of National Environmental Significance* as areas necessary:

- for activities such as foraging, breeding or dispersal;
- for the long-term maintenance of the species (including the maintenance of species essential to the survival of the species);
- to maintain genetic diversity and long term evolutionary development; and
- for the reintroduction of populations or recovery of the species.

The Recovery Plan for Marine Turtles of Australia (Commonwealth of Australia, 2017) has identified nesting locations and associated internesting areas as habitat critical to survival for four marine turtle species within the NWMR and these are identified, described and mapped in **Table 6-2** and **Figure 6-2**. No habitat critical to survival has been identified within the NWMR for olive ridley or leatherback turtles.

Table 6-2 outlines the relevant genetic stock, habitat critical to survival and key life cycle stage seasonality of the four species of marine turtles within the NWMR.

Table 6-2 Genetic stock, habitat critical to survival and key life cycle stage seasonality of the four species of marine turtles within the NWMR

Species	Woodside Activity Area			Habitat Critical to Survival			Preferred Habitat ²
	Browse	NWS/S	NWC	Nesting (* Major Rookery ¹)	Interesting Buffer	Seasonality-Nesting	
Green Turtle							
NWS Stock (G-NWS)	✓	✓	✓	Adele Island Maret Island Cassini Island Lacepede Islands* Barrow Island* Montebello Islands (all with sandy beaches)* Serrurier Island Dampier Archipelago Thevenard Island Northwest Cape* Ningaloo coast	20 km radius	Nov-Mar	Nearshore reef habitats in the photic zone.
Ashmore Reef Stock (G-AR)	✓	-	-	Ashmore Reef* Cartier Reef*		All year (peak: Dec-Jan)	
Scott Reef-Browse Island Stock (G-ScBt)	✓	-	-	Scott Reef (Sandy Islet)* Browse Island*		Nov-Mar	
Hawksbill Turtle							
Western Australia Stock (H-WA)	-	✓	-	Dampier Archipelago (including Rosemary Island and Delambre Island)* Montebello Islands (including Ah Chong Island, South East Island and Trimouille Island)* Lowendal Islands (including Varanus Island, Beacon Island and Bridled Island) Shoill Island	20 km radius	Oct-Feb	Nearshore and offshore reef habitats.

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Species	Woodside Activity Area			Habitat Critical to Survival			Preferred Habitat ²
	Browse	NWS/S	NWC	Nesting (* Major Rookery ¹)	Interesting Buffer	Seasonality-Nesting	
Flatback Turtle							
Cape Domett Stock (F-CD)	✓	-	-	Cape Domett* Lacrosse Island	60 km radius	All year (peak: Jul-Sep)	Nearshore and offshore sub-tidal and soft bottomed habitats of offshore islands.
South-west Kimberley Stock (F-swKim)	-	✓	-	Eighty Mile Beach* Eco Beach* Lacepede Islands		Oct-Mar	
Pilbara Stock (F-Pil)	-	✓	-	Montebello Islands Mundabullangana Beach* Barrow Island* Cemetery Beach Dampier Archipelago (including Delambre Island* and Huay Island) Coastal islands from Cape Preston to Locker Island		Oct-Mar	
Unknown genetic stock Kimberley, Western Australia	✓	✓	-	Maret Islands Montilivet Islands Cassini Island Coronation Islands (includes Lamarck Island) Napier-Broome Bay Islands (West Governor Island, Sir Graham Moore Island – near Kalumbaru) Champagny, Darcy and Augustus Islands (Camden Sound)		May-July	

Species	Woodside Activity Area			Habitat Critical to Survival			
	Browse	NWS/S	NWC	Nesting (* Major Rookery ¹)	Interesting Buffer	Seasonality-Nesting	Preferred Habitat ²
Western Australia Stock (LH-WA)	-	-	✓	Loggerhead Turtle Dirk Hartog Island* Muiron Islands* Gnaraloo Bay* Ningaloo coast	20 km radius	Nov-May	Nearshore and island coral reefs, bays and estuaries in tropical and warm temperate latitudes.

¹ Major rookeries as outlined in the Recovery Plan (Commonwealth of Australia, 2017)

² Preferred habitat as outlined in the Recovery Plan (Commonwealth of Australia, 2017)

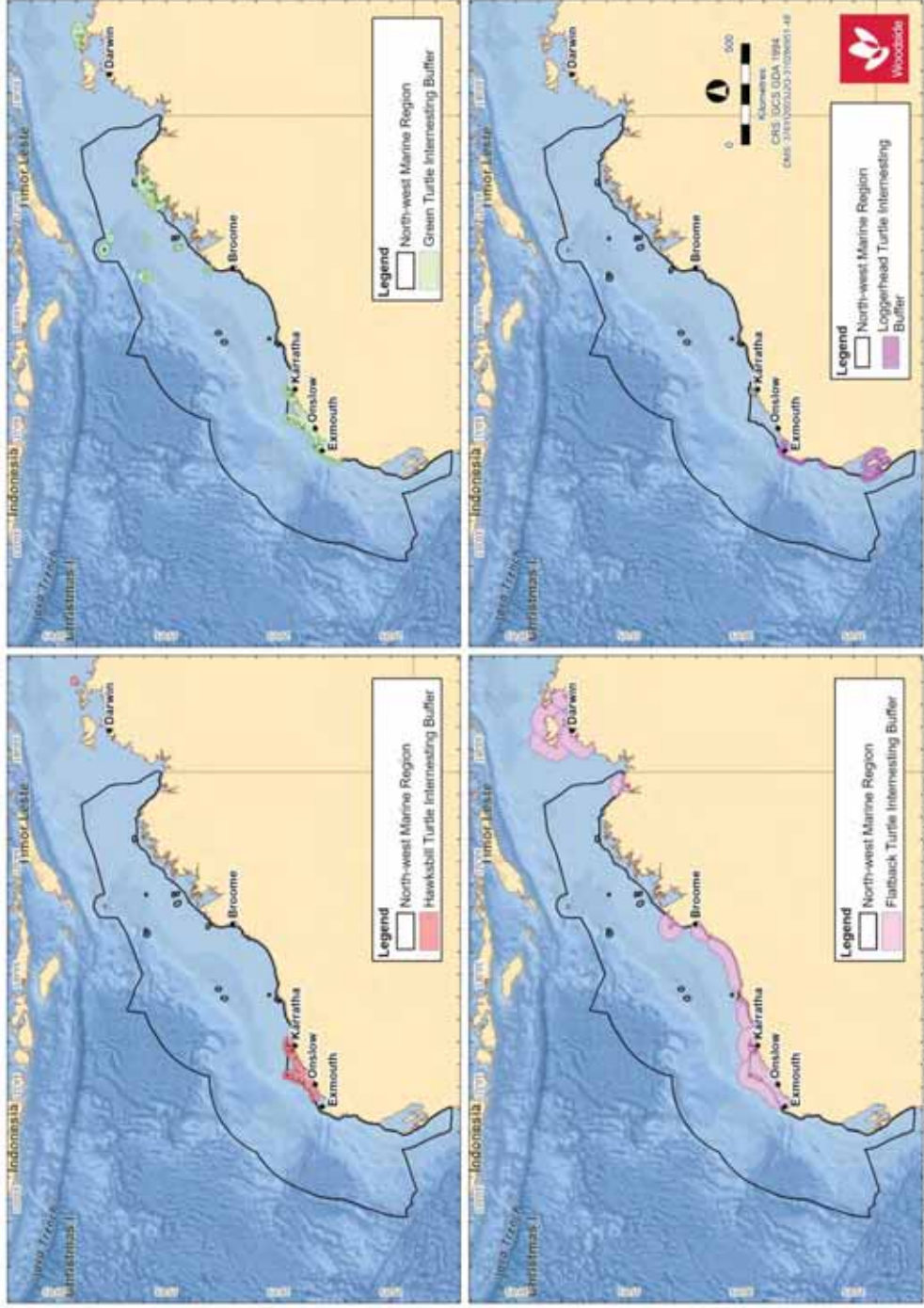


Figure 6-2 Marine turtle species habitat critical to survival (nesting beaches and interesting buffers) for the NWMR

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6.3 Marine Turtle Biological Important Areas in the NWMR

A review of the National Conservation Values Atlas (DAWE, 2020²) identified BIAs for the four marine turtle species that occur within the NWMR. These are described in **Table 6-3**. Note that nesting and interesting BIAs are not listed in **Table 6-3** as they are defined as in the Recovery Plan as habitat critical to survival for marine turtles nesting beaches and interesting areas (refer **Table 6-2**).

² <http://www.environment.gov.au/webgis-framework/apps/ncva/ncva.jsf>

Table 6-3 Marine turtle BIAs within the NWMR

Species	Woodside Activity Area			BIAs		
	Browse	NWS/S	NWC	Mating	Foraging	Migration ³
Green turtle	✓	✓	✓	No mating BIA identified within the NWMR.	Foraging inshore areas of Barrow Island Foraging at Montgomery Reef Foraging at Montebello Islands Foraging at Dixon Island Foraging around Ashmore Reef Foraging at Seringapatam Reef and Scott Reef Foraging in the De Grey River area to Bedout Island Foraging around the Islands between Cape Preston and Onslow and inshore of Barrow Island Foraging around Dampier Archipelago (islands to the west of the Burrup Peninsula) Foraging at Legendre Island and Huay Island Foraging around Delambre Island Foraging in the Joseph Bonaparte Gulf Foraging in waters adjacent to James Price Point	Green turtles can migrate more than 2600 km between their feeding and nesting grounds. Individual turtles foraging in the same area do not necessarily take the same migration route (Limpus <i>et al.</i> , 1992). Ferreira <i>et al.</i> (2021) broadly identified two migratory corridors, one used by the NWS stock-Pilbara and another used by the NWS stock-Kimberley and the Scott-Browse stock with some overlap at the northern and southern extents respectively. This study showed that the foraging distribution of green turtles from two stocks in WA expands throughout north-west and northern Australian coastal waters, including the NT and Queensland.
Hawksbill turtle	✓	✓	✓	No mating BIA identified within the NWMR.	Foraging around the Lowendal Island group Foraging at Delambre Island Foraging around Dixon Island Foraging in the De Grey River area to Bedout Island Foraging around the islands between Cape Preston and	Individuals may migrate up to 2400 km between their nesting and foraging grounds (DSEWPAC, 2012a).

³ Migration BIA does not exist for Marine Turtles – general information provided.

Species	Woodside Activity Area			BIAs		
	Browse	NWS/S	NWC	Mating	Foraging	Migration ³
Flatback turtle	✓	✓	-	<p>Lacepede Islands</p> <p>Mating at Montebello Islands</p> <p>Mating at Dampier Archipelago (islands to the west of the Burrup Peninsula)</p> <p>Mating at Barrow Island</p> <p>A year-round interbreeding buffer biologically important area (BIA) of 80 km is located north and north-west of the Montebello Islands, extending 20 km further than the habitat critical to survival. However, use level for this BIA has been defined as very low (Commonwealth of Australia, 2017) and the habitat critical to survival interbreeding buffer is the legally recognised area of protection under the EPBC Act <i>Significant Impact Guidelines 1.1 – Matters of National Environmental Significance</i></p> <p>Refer to the Marine Bioregional Plan for the Northwest Marine Region (DSEWPAC, 2012a) for locations of seasonal 80 km interbreeding buffer BIAs for flatback turtles</p>	<p>Onslow and inshore of Barrow Island</p> <p>Foraging around the islands of the Dampier Archipelago (to the west of the Burrup Peninsula)</p> <p>Foraging at Ashmore Reef</p> <p>Foraging at the islands between Cape Preston and Onslow and inshore of Barrow Island.</p> <p>Foraging at Montebello Islands</p> <p>Foraging at Dampier Archipelago (islands to the west of the Burrup Peninsula)</p> <p>Foraging at Legendre Island and Huay Island</p> <p>Foraging at Delambre Island</p> <p>Foraging in the Joseph Bonaparte Depression</p> <p>Foraging in waters adjacent to James Price Point</p>	<p>There is evidence that some flatback turtles undertake long-distance migrations between breeding and feeding grounds (Limpus <i>et al.</i>, 1983). However, flatback turtles generally do not have a pelagic phase to their lifecycle. Instead, hatchlings grow to maturity in shallow coastal waters thought to be close to their natal beaches (DSEWPAC, 2012a).</p>

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Species	Woodside Activity Area			BIAs		
	Browse	NWS/S	NWC	Mating	Foraging	Migration ³
Loggerhead turtle	✓	✓	-	No mating BIA identified within the NWMR	Foraging in the De Grey River area to Bedout Island Foraging on the Western Joseph Bonaparte Depression Foraging in the waters adjacent to James Price Point	Adult loggerhead turtles dispersing from Dirk Hartog Island beaches (near Shark Bay) have remained within WA waters from southern WA to the Kimberley. Turtles dispersing from the North-west Cape—Muiron Islands nesting area have ranged north as far as the Java Sea and the north-western Gulf of Carpentaria, and to south-west WA (DSEWPAC, 2012).
Olive ridley turtle	✓	✓	-	No mating BIA identified within the NWMR	Foraging in the Western Joseph Bonaparte Depression and Gulf Foraging in the Dampier Archipelago (islands to the west of the Burrup Peninsula)	Migration routes and distances between nesting beaches and foraging areas are not known for Australian olive ridley turtles.

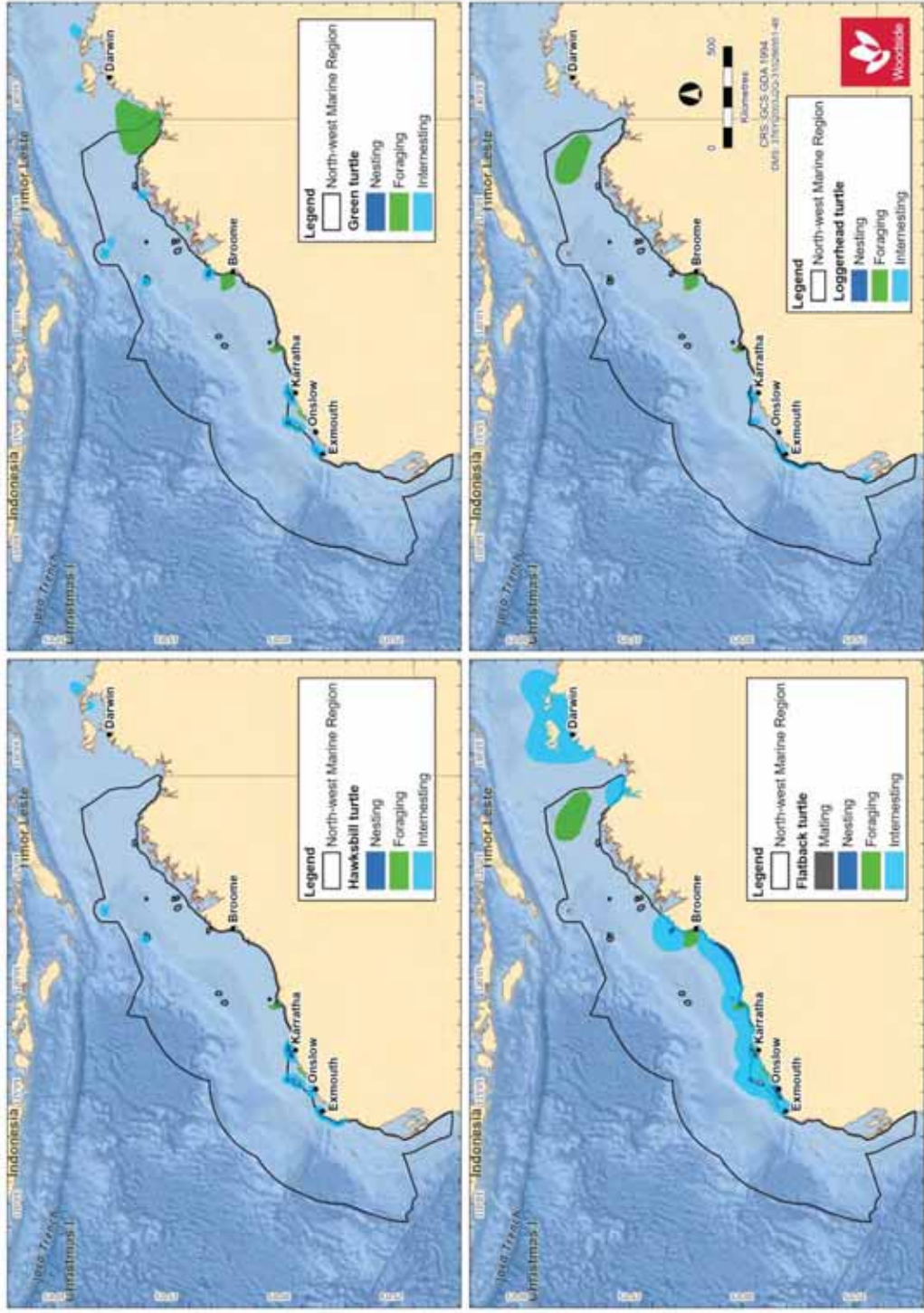


Figure 6-3 Marine turtle species BIAs within the NWMR

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6.4 Marine Turtle Summary for NWMR

Six of the seven marine turtle species occur within the Woodside activity areas. Across all three areas, globally significant breeding populations of four marine turtle species; the green, hawksbill, flatback and loggerhead turtle, have been recorded.

However, offshore waters do not represent biologically important habitat for marine turtles in any of the three Woodside activity areas. Isolated records of transient individuals (on post-nesting migration) are expected, but there is no evidence of important habitat or behaviours for marine turtles in offshore, open water environment of the NWS, in general.

6.4.1 Browse

The proposed Browse activity area includes major nesting areas that support globally significant breeding populations of two marine turtle species:

- the green turtle, including two distinct genetic stocks (Ashmore Reef and Scott Reef-Browse Island); and
- the flatback turtle, Cape Domett genetic stock.

Locations of habitat critical for each of the two species are outlined in **Table 6-2** and **Figure 6-2**.

BIAs for the green and flatback turtle are outlined in **Table 6-3** and **Figure 6-3**.

Table 6-4 Marine turtle key information for Browse activity area

Species / Genetic Stock	Key Information
Green Turtle	
Ashmore Reef Stock (G-AR)	<p>The G-AR stock nests in a localised area of the Indian Ocean in the Ashmore Reef and Cartier Island AMP areas. Population estimates are not available for Ashmore Reef, although annual breeding numbers are thought to be in the low hundreds (Whiting, 2000).</p> <p>Designated habitat critical for the G-AR stock are the nesting locations of Ashmore Reef and Cartier Reef, and an internesting buffer of 20 km radius around these rookeries, year-round with peak internesting activity occurring December to January (refer Table 6 of the Recovery Plan).</p> <p>Juvenile and adult turtles forage within the tidal/sub-tidal habitats of offshore islands and coastal waters with coral reef, mangrove, sand, rocky reefs, and mudflats where there are algal turfs or seagrass meadows present (Commonwealth of Australia, 2017).</p>
Scott Reef-Browse Island Stock (G-ScBr)	<p>The G-ScBr stock is a discrete unit known to nest at only two locations within the north-east Indian Ocean—Sandy Islet and Browse Island. There is currently very limited data available for the G-ScBr stock, therefore population numbers are not known.</p> <p>Designated habitat critical for the G-ScBr stock are the nesting locations of Sandy Islet and Browse Island, and an internesting buffer of 20 km radius around these rookeries, for the period November to March (refer Table 6 of the Recovery Plan).</p> <p>Surveys conducted at Scott Reef in 2006, 2008 and 2009 indicate that the summer months from late November to February are the preferred breeding season for green turtles at Sandy Islet (Guinea, 2009).</p> <p>Satellite tagging studies (Pendoley, 2005; Guinea, 2011) have provided an indication of the behaviour and migratory routes of adult green turtles leaving Scott Reef. Most animals appear to swim through South Reef lagoon and disperse toward the Western Australian mainland via two distinct post-nesting migration pathways; travelling east and north toward the Bonaparte Archipelago and then north along the coast to foraging areas in NT waters, or travelling south to Cape Leveque and then south along the coast to the Turtle Islands off the mouth of the De Grey River in the Pilbara region (Ferreira <i>et al.</i>, 2021).</p>

Species / Genetic Stock	Key Information
Flatback Turtle	
Cape Domett Stock (F-CD)	<p>Cape Domett is an important high density nesting area. Combined with a smaller site at Lacrosse Island, the F-CD stock is one of the largest flatback turtle stocks in Australia. Average nesting abundance at Cape Domett is estimated at 3250 females per year (Whiting <i>et al.</i>, 2008).</p> <p>Designated habitat critical for the F-CD stock are the nesting locations of Cape Domett and Lacrosse Island, and an interesting buffer of 60 km radius around these rookeries, year-round with peak interesting activity occurring July to September.</p> <p>Extending further than the habitat critical interesting buffer, an interesting buffer BIA of 80 km is located at Cape Domett and Lacrosse Island.</p>

6.4.2 North-west Shelf / Scarborough

The NWS / Scarborough activity area includes major nesting areas that support globally significant breeding populations of three marine turtle species, representing four discreet genetic stocks:

- the green turtle, NWS genetic stock;
- the hawksbill turtle, WA genetic stock; and
- the flatback turtle, South-west Kimberley stock and Pilbara genetic stocks.

Locations of habitat critical for each of the four species are outlined in **Table 6-2** and **Figure 6-2**.

BIAs for the green, hawksbill, and flatback are outlined in **Table 6-3** and **Figure 6-3**.

Table 6-5 Marine turtle key information for NWS / Scarborough activity area

Species / Genetic Stock	Key Information
Green Turtle	
NWS Stock (G-NWS)	<p>The G-NWS stock is one of the largest green turtle stocks in the world and the largest in the Indian Ocean. The G-NWS stock is estimated at approximately 20,000 individuals (DSEWPAC, 2012a) and the trend for the stock is reported as stable (Commonwealth of Australia, 2017).</p> <p>Major rookeries of the G-NWS stock within the NWS / Scarborough activity area are located at Barrow Island and the Montebello Islands. These areas are designated habitat critical for the stock and include an interesting buffer of 20 km radius around these rookeries, November to March.</p>
Hawksbill Turtle	
Western Australia Stock (H-WA)	<p>The H-WA stock is the largest in the Indian Ocean. The majority of the nesting for this stock is located in the Pilbara. The Dampier Archipelago has the largest nesting aggregation recorded. In particular, Rosemary Island supports the most significant hawksbill turtle rookery in the WA region and one of the largest in the Indian Ocean; approximately 500-1000 females nest on the island annually, more than at any other WA rookery (Pendoley, 2005; Pendoley <i>et al.</i>, 2016).</p> <p>Major rookeries of the H-WA stock within the NWS / Scarborough activity area are located at Rosemary Island, Delambre Island and the Montebello Islands. These areas are designated habitat critical for the stock and include an interesting buffer of 20 km radius around these rookeries, October to February.</p>
Flatback Turtle	
South-west Kimberley Stock (F-swKim)	<p>The genetic relationship between this nesting aggregation and the Cape Domett and Pilbara stocks is currently under review. Population numbers of the F-swKim stock are unknown.</p> <p>Major rookeries of the F-swKim stock are located at Eighty Mile Beach and Eco Beach. These areas are designated habitat critical for the stock and include an interesting buffer of 60 km radius around these rookeries, October to March.</p>

Species / Genetic Stock	Key Information
Pilbara Stock (F-Pil)	<p>The extent of genetic relatedness of flatback turtles along the WA coast is currently under review. Population numbers of the F-Pil stock are unknown. This stock nests on many islands in the Pilbara and southern Kimberley, with major rookeries at Mundabullangana Beach, Delambre Island and Barrow Island. These areas are designated habitat critical for the F-Pil stock and include an interesting buffer of 60 km radius around these rookeries, October to March.</p> <p>Extending further than the habitat critical interesting buffer, a year-round interesting buffer BIA of 80 km is located north and north-west of the Montebello Islands. However, use level for this BIA has been defined as very low (Commonwealth of Australia, 2017) and the habitat critical interesting buffer is the legally recognised area of protection under the EPBC Act <i>Significant Impact Guidelines 1.1 – Matters of National Environmental Significance</i>.</p> <p>Post-nesting satellite tracking indicates foraging occurs along the WA coast in water shallower than 130 m and within 315 km of shore (Commonwealth of Australia, 2017).</p>

6.4.3 North-west Cape

The North-west Cape activity area includes major nesting areas that support globally significant breeding populations of two marine turtle species, representing two discreet genetic stocks:

- the green turtle, NWS genetic stock; and
- the loggerhead turtle, Western Australia genetic stock.

Locations of habitat critical for each of the two species are outlined in **Table 6-2** and **Figure 6-2**.

BIAs for the green and loggerhead turtles are outlined in **Table 6-3** and **Figure 6-3**.

A 2018 survey, including on-beach monitoring of the Muiron Islands and Ningaloo Coast from North-west Cape to Bungleup (Rob *et al.*, 2019), supports the concept that North-west Cape and the Muiron Islands are major important nesting areas for green and loggerhead turtles, as identified in the Recovery Plan (Commonwealth of Australia, 2017).

Table 6-6 Marine turtle key information for North-west Cape activity area

Species / Genetic Stock	Key Information
Green Turtle	
NWS Stock (G-NWS)	<p>The G-NWS stock is one of the largest green turtle stocks in the world and the largest in the Indian Ocean. The G-NWS stock is estimated at approximately 20,000 individuals (DSEWPAC, 2012a) and the trend for the stock is reported as stable (Commonwealth of Australia, 2017).</p> <p>There is one major rookery of the G-NWS stock located within the North-west Cape activity area. Located on the mainland coast of the North-west Cape, this area is designated habitat critical for the stock and includes an interesting buffer of 20 km radius around the rookery, November to March.</p>
Loggerhead Turtle	
Western Australia Stock (LH-WA)	<p>The LH-WA stock is one of the largest in the world (Limpus, 2009). The trend for the stock is reported as stable (Commonwealth of Australia, 2017).</p> <p>Major rookeries of the LH-WA stock are located at Dirk Hartog Island, Muiron Islands and Gnaraloo Bay. These areas are designated habitat critical for the stock and include an interesting buffer of 20 km radius around these rookeries, November to May.</p> <p>Dirk Hartog Island in the Shark Bay Marine Park, with an average of 122 nests per day over 2.1 km (Reinhold and Whiting, 2014), is recognised as the most important loggerhead turtle rookery in WA (Commonwealth of Australia, 2016; as cited in Rob <i>et al.</i>, 2019).</p>

6.5 Sea Snakes

Sea snakes are commonly found in the NWMR and NMR, but less so in the SWMR, and occupy three broad habitat types: shallow water coral reef and seagrass habitats, deepwater soft bottom habitats away from reefs, and surface water pelagic habitats (Guinea, 2007a).

There are 25 listed species of sea snake reported within or adjacent to the NWMR (Guinea, 2007a; Udyawer *et al.*, 2016), of which four are endemic to reef habitats in the remote parts of the region:

- dusky sea snake (*Aipysurus fuscus*);
- large headed sea snake (*Hydrophis pacificus*);
- short-nosed sea snake (*Aipysurus apraefrontalis*); and
- leaf-scaled sea snake (*Aipysurus foliosquama*).

The short-nosed sea snake and the leaf-scaled sea snake are listed threatened species (Critically Endangered) under the EPBC Act (**Table 6-7**).

There is currently limited knowledge about the ranges and distribution patterns of sea snake species in the NWMR, in addition to a lack of understanding of population status and threats. Recent findings of *A. apraefrontalis* and *A. foliosquama* in locations outside of their previously defined ranges have highlighted the lack of information on species distributions in the NWMR (Udyawer *et al.*, 2016). Udyawer *et al.* (2020) used a correlative modelling approach to understand habitat associations and identify suitable habitats for five sea snake species (*A. apraefrontalis*, *A. foliosquama*, *A. fuscus*, *A. l. pooleorum* and *A. tenuis*). Species-specific habitat suitability was modelled across 804,244 km² of coastal waters along the NWS, and the resulting habitat suitability maps enabled the identification of key locations of suitable habitat for these five species (refer **Table 6-6**).

No habitat critical to survival or BIAs for sea snake species have been identified in the NWMR. While the Ashmore Reef and Cartier Island AMPs have been recognised for their high diversity and density of sea snakes (DSEWPAC, 2012a), surveys have revealed a steep decline in sea snake numbers at Ashmore Reef (Guinea, 2007b; Lukoschek *et al.*, 2013). Leaf-scaled and short-nosed sea snakes have been absent from surveys at Ashmore Reef since 2001, despite an increase in survey intensity (Guinea, 2006, 2007b; Guinea and Whiting, 2005; Lukoschek *et al.*, 2013). The reason for the decline is unknown.

Table 6-7 Information on the two threatened sea snake species within the NWMR

Species	Preferred Habitat and Diet	Habitat Location
Short-nosed sea snake	Preferred habitat: Primarily on the reef flats or in shallow waters of the outer reef edges to depths of 10 m (Minton <i>et al.</i> , 1975). Typically, movement is restricted to within 50 m of reef flat habitat (Guinea and Whiting, 2005). Diet: Primarily fishes and eels.	The short-nosed sea snake has been recorded from Exmouth Gulf to the reefs of the Sahul Shelf, although most records come from Ashmore and Hibernia reefs (Guinea and Whiting, 2005). Key locations of suitable habitat: Ashmore Reef, Exmouth Gulf, Muiron Islands, Montebello Islands (Udyawer <i>et al.</i> , 2020).
Leaf-scaled sea snake	Preferred habitat: The leaf-scaled sea snake occurs in shallow protected areas of reef flats, typically in water depth less than 10 m. Diet: Primarily shallow water coral-associated wrasse, gudgeons, clinids and eels (McCosker, 1975; Voris, 1972; Voris and Voris, 1983)	The leaf-scaled sea snake has only been recorded at Ashmore and Hibernia reefs (Guinea and Whiting, 2005), indicating it has a very limited distribution. Key locations of suitable habitat: Ashmore Reef, Shark Bay, Exmouth Gulf, Barrow Island and Montebello Islands (Udyawer <i>et al.</i> , 2020).

6.6 Crocodiles

The salt-water crocodile (*Crocodylus porosus*) is a listed migratory species under the EPBC Act known to occur within the NWMR. The species is found in most major river systems of the Kimberley, including the Ord, Patrick, Forrest, Durack, King, Pentecost, Prince Regent, Lawley, Mitchell, Hunter, Roe and Glenelg rivers. The largest populations occur in the rivers draining into the Cambridge Gulf and the Prince Regent River and Roe River systems. There have also been isolated records in rivers of the Pilbara region, around Derby near Broome and as far south as Carnarvon on the mid-west coast.

No BIAs for salt-water crocodile have been identified in the NWMR.

7. MARINE MAMMALS

7.1 Regional Context

The offshore waters of WA include important habitat for marine mammals, including areas that support key life stages such as breeding, foraging, and migration. Of the 45 species of cetacean occurring in Australian waters, 27 species occur regularly in the waters of the NWMR, nine species in the waters of the NMR and 33 species in the SWMR. The waters of the NWMR and the NMR also support significant populations of dugong (DSEWPAC, 2012a, c).

The NWMR is an important migratory pathway between feeding grounds in the Southern Ocean and breeding grounds in tropical waters of the NWMR for several cetacean species (DSEWPAC, 2012a). Numerous large mysticetes (baleen whale) species, in particular the humpback whale, are known to utilise the region for migration and calving, and the pygmy blue whale for foraging and as a migration pathway between southern feeding and northern breeding/feeding areas, north of the equator.

The SWMR is an important area for numerous marine mammal species including pinniped species, large, migratory whale species and resident coastal whale and dolphin species (DSEWPAC, 2012b).

The NMR and adjacent areas are important for several species of cetacean, particularly inshore dolphin species. These species, and other marine mammals, rely on the waters of the NMR and adjacent coastal areas for breeding and foraging. However, there is little knowledge of the seasonal movements, migrations and breeding seasonality for many of the marine mammal species in the NMR due to lack of extensive surveys (DSEWPAC, 2012c).

Table 7-1 outlines the threatened and migratory marine mammal species that may occur within the NWMR, with their conservation status and relevant recovery plans and/or conservation advice.

Table 7-1 Marine mammal species identified by the EPBC Act PMST as occurring within the NWMR

Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
Cetaceans - Mysticeti							
<i>Balaenoptera musculus</i>	Blue whale	Endangered	Migratory	Cetacean	Endangered	Conservation Management Plan for the Blue Whale - A Recovery Plan under the Environment Protection and Biodiversity Conservation Act 1999 2015-2025 (Commonwealth of Australia, 2015a)	
<i>Eubalaena australis</i>	Southern right whale	Endangered	Migratory	Cetacean	Vulnerable	Conservation Management Plan for the Southern Right Whale: A Recovery Plan under the Environment Protection and Biodiversity Conservation Act 1999 2011-2021 (DSEWPAC, 2012d)	
<i>Balaenoptera borealis</i>	Sei whale	Vulnerable	Migratory	Cetacean	Endangered	Conservation Advice <i>Balaenoptera borealis</i> sei whale (Threatened Species Scientific Committee, 2015a)	
<i>Megaptera novaeangliae</i>	Humpback whale	Vulnerable	Migratory	Cetacean	Conservation dependent	Conservation Advice <i>Megaptera novaeangliae</i> humpback whale (Threatened Species Scientific Committee, 2015b)	
<i>Balaenoptera physalus</i>	Fin whale	Vulnerable	Migratory	Cetacean	Endangered	Conservation Advice <i>Balaenoptera physalus</i> fin whale (Threatened Species Scientific Committee, 2015c)	
<i>Balaenoptera edeni</i>	Bryde's whale	N/A	Migratory	Cetacean	N/A	N/A	
<i>Balaenoptera bonaerensis</i>	Antarctic minke whale	N/A	Migratory	Cetacean	N/A	N/A	
Cetaceans - Odontoceti							
<i>Physeter macrocephalus</i>	Sperm whale	N/A	Migratory	Cetacean	Vulnerable	N/A	
<i>Orcinus orca</i>	Killer whale	N/A	Migratory	Cetacean	N/A	N/A	
<i>Orcella heinsohni</i>	Australian snubfin dolphin	N/A	Migratory	Cetacean	Priority	N/A	
<i>Sousa chinensis</i>	Indo-Pacific humpback dolphin	N/A	Migratory	Cetacean	Priority	N/A	

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Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
<i>Tursiops aduncus</i>	Spotted bottlenose dolphin (Arafura/Timor Sea populations)	N/A	Migratory	Cetacean	N/A	N/A	
Sirenians and Pinnipeds							
<i>Dugong dugon</i>	Dugong	N/A	Migratory	Marine	Other protected fauna	N/A	
<i>Neophoca cinerea</i>	Australian sea lion	Endangered	N/A	Marine	Vulnerable		Recovery Plan for the Australian Sea Lion (<i>Neophoca cinerea</i>) 2013 (DSEWPAC, 2013a) Conservation Advice <i>Neophoca cinerea</i> Australian Sea Lion (Threatened Species Scientific Committee, 2020a) (in effect under the EPBC Act from 23-Dec-2020)

7.2 Cetaceans in the NWMR

Cetaceans are generally widely distributed and highly mobile. In general, distribution patterns reflect seasonal feeding areas, characterised by high productivity, and migration routes associated with reproductive patterns. The NWMR is thought to be an important migratory pathway between feeding grounds in the Southern Ocean and breeding grounds in tropical waters for several cetacean species (DSEWPAC, 2012a).

From the Protected Matters search, 34 EPBC Act listed species were recorded as potentially occurring or having habitat within the NWMR (**Appendix A**). Of those, 12 cetacean species are listed as threatened and/or migratory, including baleen whales, toothed whales and dolphins that occur within the NWMR (**Table 7-2**).

7.3 Dugongs in the NWMR

The dugong is listed as migratory under the EPBC Act. Dugongs inhabit seagrass meadows in coastal waters, estuarine creeks and streams, and reef systems (DSEWPAC, 2012a).

Some of the coastal waters adjacent to the NWMR support significant populations of dugongs, including Shark Bay, Exmouth Gulf, in and adjacent to Ningaloo Reef, in coastal waters along the Kimberley coast, and on the edge of the continental shelf at Ashmore Reef (DEWHA, 2008).

Although the patterns of dugong movement in WA are not well understood, it is thought that dugongs move in response to availability of seagrass (Marsh *et al.*, 1994; Preen *et al.*, 1997) and water temperature.

There are a number of BIAs for dugong within and adjacent to waters of the NWMR (refer **Section 7.5**).

7.4 Pinnipeds in the NWMR

The Australian sea lion is listed as a species that may occur, or may have habitat within the NWMR (Protected Matters search - **Appendix A**). It is included here as the Australian sea lion is the only pinniped endemic to Australia (Strahan, 1983) and has been recorded within the southern extent of the NWMR at Shark Bay, WA (Kirkwood *et al.*, 1992). The most northern known breeding colony is at the Houtman Abrolhos Islands in the SWMR. The Australian sea lion's breeding range extends from the Houtman Abrolhos Islands, WA to The Pages Island, east of Kangaroo Island, SA. The Australian sea lion was listed as endangered in 2020 (Threatened Species Scientific Committee, 2020a). An assessment of the status and trends in abundance of this endemic, coastal pinniped species (Goldsworthy *et al.* 2021) documented an overall reduction in pup abundance over three generations, providing strong evidence that the species meets IUCN endangered criteria.

There are no BIAs for the Australian sea lion in the NWMR.

Table 7-2 Information on the threatened/migratory marine mammal species within the NWMR

Species	Key Information
Humpback whale	<p>Baleen whales (Mysticeti)</p> <p>In Australian waters two genetically distinct populations migrate annually along the west (Group IV) and east coasts (Group V) between May and November. In WA, the migration pathway for the Group IV population (also known as Breeding Stock D) extends from Albany to the Kimberley coastline, passing through the NWMR (Threatened Species Scientific Committee, 2015b). Since the 1982 moratorium on commercial whaling population numbers have recovered significantly; from approximately 2000 to 3000 individuals in 1991, to between 19,200–33,850 individuals in 2008 (Bannister and Hedley, 2001; Bejder <i>et al.</i>, 2019; Hedley <i>et al.</i>, 2011). Aerial surveys off the WA coast undertaken between 2000 and 2008 produced a population estimate for the Group IV population of 26,100 individuals (CI 20,152–33,272) in 2008 (Salgado Kent <i>et al.</i>, 2012). Current population growth for the Group IV population is estimated to be between 9.7 and 13% per annum (Threatened Species Scientific Committee, 2015b). Using the Salgado-Kent <i>et al.</i> (2012) estimate of 26,100 individuals and an annual population growth rate of ~10%, current population size could be in excess of 75,000 individuals (Woodside, 2019).</p> <p>The Group IV population migrates northward from their Antarctic feeding grounds around May each year, reaching the NWMR around early June. The southward migration subsequently starts in mid-September, around the time of breeding and calving (typically August to September) (Threatened Species Scientific Committee, 2015b). Within the NWMR there are key calving areas between Broome and the northern end of Camden Sound, and resting areas in the southern Kimberley region, Exmouth Gulf and Shark Bay. In particular, high numbers of humpback whales are observed in Camden Sound and Pender Bay from June to September each year (Threatened Species Scientific Committee, 2015b). There are reports of neonates further south, suggesting that the calving areas may be poorly defined. Aerial photogrammetric surveys in 2013 and 2015 recorded large numbers of humpback whale calves along North-west Cape, with estimated minimum relative calf abundance of 463–603 in 2013 and 557–725 in 2015 (Irvine <i>et al.</i>, 2018). The majority of calves sighted in both years (85% in 2013; 94% in 2015) were neonates, and these observations indicate that a minimum of approximately 20% of the expected number of calves of this population are born near, or south of, North-west Cape. Thus, the calving grounds for the Group IV population extend south from Camden Sound to at least North-west Cape, 1000 km south-west of the currently recognized calving area (Irvine <i>et al.</i>, 2018).</p> <p>There are BIAs for migration and breeding and calving for the humpback whale along the WA coast and within the NWMR (refer Table 7-3 and Figure 7-1).</p>
Blue whale	<p>There are two recognised sub-species of blue whale in the Southern Hemisphere, both of which are recorded in Australian waters. These are the southern (or 'true') blue whale (<i>Balaenoptera musculus</i>) and the 'pygmy' blue whale (<i>Balaenoptera musculus brevicauda</i>) (Commonwealth of Australia, 2015a). In general, southern blue whales occur in waters south of 60°S and pygmy blue whales occur in waters north of 55°S (i.e. not in the Antarctic). On this basis, nearly all blue whales sighted in the NWMR are likely to be pygmy blue whales.</p> <p>The East Indian Ocean (EIO) pygmy blue whale population is seasonally distributed from Indonesia (a potential breeding ground) to south-west of Australia and east across the Great Australian Bight and Bonney Upwelling to beyond the Bass Strait (Blue Planet Marine, 2020). Migration seems to be variable, with some individuals appearing as resident to areas of high productivity and others undertaking migrations across long distances (Commonwealth of Australia, 2015a). McCauley <i>et al.</i> (2018) describe three migratory stages around Australia for the EIO pygmy blue whale population: a 'southbound migratory stage' where whales travel southwards from Indonesian waters offshore from the WA coastline, mostly from October to December but possibly into January of the following year; a protracted 'southern Australian stage' (January to June) where animals spread across southern waters of the Indian Ocean and south of Australia; and a 'northbound migratory stage' (April to August) where animals travel north back to Indonesia again.</p> <p>There are currently insufficient data to accurately estimate population numbers of the pygmy blue whale in Australian waters (Blue Planet Marine, 2020; Commonwealth of Australia, 2015a). There are, however, two estimates of population size of the EIO pygmy blue whale for WA. McCauley and Jenner (2010) calculated the population to be between 662 and 1559 individuals in 2004 based on passive acoustics (whale vocalisations), and Jenner <i>et al.</i> (2008) (based on photographic mark and recapture) calculated between 712 and 1754 individuals, but both estimates did not account for animals</p>

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Species	Key Information
	<p>travelling further west into the Indian Ocean (McCauley <i>et al.</i>, 2018). More recent passive acoustic data estimates a 4.3% growth rate that applies to the proportion of EIO pygmy blue whales seasonally present in offshore water of the south-eastern Australia and may not reflect the full population but does imply an increasing population (McCauley <i>et al.</i>, 2018).</p> <p>The pygmy blue whale is typically present in the Perth Canyon from November to June, with an observed peak between March and May (Commonwealth of Australia, 2015a; Blue Planet Marine, 2020). The pygmy blue whale feeds in the Perth Canyon at depths of 200 to 300 m, which overlaps the typical distribution of krill (200–500 m water depth (day) to surface (night) (McCauley <i>et al.</i>, 2004; Commonwealth of Australia, 2015a). Other possible feeding grounds off the WA coast include the wider area around the Perth Canyon, and possible foraging areas off the Ningaloo Coast and at Scott Reef (Commonwealth of Australia, 2015a).</p> <p>Refer Table 7-3 and Figure 7-2 for the location and type of BIAs for blue whales in the NWMR. There is a migratory BIA for the pygmy blue whale within WA waters, which extends for most of the length of the NWMR within offshore waters.</p>
Bryde's whale	<p>The Bryde's whale is the least migratory of its genus and is restricted geographically from the equator to approximately 40°N and S, or the 20° isotherm (Bannister <i>et al.</i>, 1996). The species is known to exhibit inshore and offshore forms in other international locations that vary in morphology and migratory behaviours (Bannister <i>et al.</i>, 1996). This appears to also be the case within Australian waters. Bryde's whales have been identified as occurring in both oceanic and inshore waters, with the only key localities recognised in WA being in the Houtman Abrolhos Islands and north of Shark Bay (Bannister <i>et al.</i>, 1996). Data suggests offshore whales migrate seasonally, heading towards warmer tropical waters during the winter; however, information about migration within the NWMR is not well known (McCauley and Duncan, 2011). McCauley (2011) detected Bryde's whales using acoustic loggers deployed in and around Scott Reef from 2006 to 2009. Other acoustic logger data of Bryde's whale vocalisations recorded between Ningaloo and north of Darwin showed no apparent trends or seasonality (McCauley, 2011). There are no identified BIAs for this species in the National Conservation Values Atlas.</p>
Southern right whale	<p>The southern right whale occurs primarily in waters between about 20°S and 60°S and moves from high latitude feeding grounds in summer to warmer, low latitude, coastal locations in winter (Bannister <i>et al.</i>, 1996). Southern right whales aggregate in calving areas along the south coast of WA outside of the NWMR. However, there have been sightings in waters of the NWMR as far north as Ningaloo (Bannister and Hedley, 2001), and a stranding record exists for the far north Kimberley coast (ALA, 2020). Southern right whale calving grounds are found at mid to lower latitudes and are occupied during the austral winter and early-mid spring. They are regularly present on the southern Australian coast from about mid-May to mid-November, and peak periods for mating are from mid-July through August. Mating occurs within these breeding grounds as evidenced by many observations of intromission and mating behaviours. Southern right whales in south-western Australia appear to be increasing at the maximum biological rate but there is limited evidence of increase in south-eastern Australian waters (DSEWPAC, 2012d). There are no identified BIAs for this species in the NWMR.</p>
Antarctic minke whale	<p>The Antarctic minke whale is distributed worldwide and has been recorded off all Australian states (but not in the NT), feeding in cold waters and migrating to warmer waters to breed. It is thought that the Antarctic minke whale migrates up the WA coast to about 20°S to feed and possibly breed (Bannister <i>et al.</i>, 1996); however, detailed information about timing and location of migrations and breeding grounds within the NWMR is not well known. In the high latitudinal winter breeding grounds in other regions, the species appears to be distributed off the continental shelf edge. No population estimates are available for Antarctic minke whales in Australian waters. There are no identified BIAs for this species in the National Conservation Values Atlas.</p>
Sei whale	<p>The sei whale is a baleen whale with a worldwide oceanic distribution and is expected to seasonally migrate between low latitude wintering areas and high latitude summer feeding grounds (Bannister <i>et al.</i>, 1996; Prieto <i>et al.</i>, 2012). There are no known mating or calving areas in Australian waters. The species has a preference for deep waters, typically occurs in oceanic basins and continental slopes (Prieto <i>et al.</i>, 2012), and exhibits a migration pathway influenced by seasonal feeding and breeding patterns. Sei whales have been infrequently recorded in Australian waters (Bannister <i>et al.</i>, 1996). Reliable estimates of the sei whale population size in Australian waters are currently not possible due to a lack of dedicated surveys and their elusive characteristics. Similarly, the extent of occurrence and area of occupancy of sei whales in Australian waters cannot be calculated due to the</p>

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Species	Key Information
	<p>rarity of sighting records. They will typically travel in small pods of three to five individuals, with some segregation by age, sex and reproductive status. Calving grounds are presumed to exist in low latitudes with mating and calving potentially occurring during winter months (Threatened Species Scientific Committee, 2015a). There are no known mating or calving areas in Australian waters, and there are no identified BIAs for this species in the National Conservation Values Atlas.</p>
Fin whale	<p>The fin whale is a large baleen whale distributed worldwide. Fin whales migrate annually between high latitude summer feeding grounds and lower latitude over-wintering areas (Bannister <i>et al.</i>, 1996) and follow oceanic migration paths. The species is uncommonly encountered in coastal or continental shelf waters. Australian Antarctic waters are important feeding grounds for fin whales but there are no known mating or calving areas in Australian waters (Morrice <i>et al.</i>, 2004). The species has been observed in groups of six to 10 individuals, as well as in pairs and alone (Threatened Species Scientific Committee, 2015c). Accurate distribution patterns are not known within Australian waters and the majority of data are from stranding events.</p> <p>Fin whales have been recorded vocalising off the Perth Canyon, WA, between January and April 2000 (McCauley <i>et al.</i>, 2000). It is currently not possible to accurately estimate the population size of fin whales in Australian waters predominantly due to the species' behaviour and local ecology, as the proportion of time they spend at the surface varies greatly depending on these factors. In addition, natural fluctuations of fin whales in Australian waters are unknown; however, long-range movements do appear to be prey-related. A recent study by Aulich <i>et al.</i> (2019) used passive acoustic monitoring as a tool to identify the migratory movements of fin whales in Australian waters. On the west coast, the earliest arrival of these animals occurred at Cape Leeuwin in April, and between May and October they migrated along the WA coastline to the Perth Canyon, which likely acts as a way-station for feeding (Aulich <i>et al.</i>, 2019). Some whales were found to continue migrating as far north as Dampier (Aulich <i>et al.</i>, 2019). There are no identified BIAs for this species in the National Conservation Values Atlas.</p>
Toothed whales (Odontoceti)	
Sperm whale	<p>Sperm whales are the largest of the toothed whales and are distributed worldwide in deep waters (greater than 200 m) off continental shelves and sometimes near shelf edges (Bannister <i>et al.</i>, 1996). The species tends to inhabit offshore areas at depths of 600 m or more and is uncommon in waters less than 300 m deep (Ceccarelli <i>et al.</i>, 2011). There is limited information about sperm whale distribution in Australian waters, however, they are usually found in deep offshore waters, with more dense populations close to continental shelves and canyons. In the open ocean, there is a generalised movement of sperm whales southwards in summer, and corresponding movement northwards in winter, particularly for males. Detailed information about the distribution and migration patterns of sperm whales off the WA coast is not available. Females with young may reside within the NWMR all year round, males may migrate through the region and the species may be associated with canyon habitats (Ceccarelli <i>et al.</i>, 2011).</p> <p>Sperm whales have been recorded in deep waters off North-west Cape and appear to occasionally venture into shallower waters in other areas. Twenty-three (23) sightings of sperm whales (variable pod sizes, ranging from one to six animals) were recorded by marine mammal observers (MMOs) during the North West Cape MC3D marine seismic survey (December 2016 to April 2017) (Woodside, 2020). These animals were observed in deep, continental slope waters of the Montebello Saddle (maximum distance of approximately 90 km from North-west Cape), and the waters overlying the Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula KEF. The deep waters above the gully/saddle on the inner edge of the plateau (the Montebello Saddle) are thought to be important for sperm whales that may feed in the region (based on 19th Century whaling records; Townsend, 1935).</p> <p>There are no identified BIAs for this species in the NWMR.</p>
Killer whale	<p>The preferred habitat of killer whales includes oceanic, pelagic and neritic (relatively shallow waters over the continental shelf) regions, in both warm and cold waters. Killer whales appear to be more common in cold, deep waters; however, they have been observed along the continental slope and shelf, particularly near seal colonies, as well as in shallow coastal areas of WA (Bannister <i>et al.</i>, 1996; Thiele and Gill, 1999). The total number of killer whales in Australian waters is unknown, however, it may be that the total number of mature animals within waters around the continent is less than 10,000. Killer whales are known to make seasonal movements, and probably follow regular migratory routes, but no information is available for the</p>

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Species	Key Information
	<p>species in Australian waters. Killer whales are top-level carnivores, and there are reports from around Australia of attacks on dolphins, juvenile humpback whales, blue whales, sperm whales, and Australian sea lions (Bannister <i>et al.</i>, 1996). Killer whales are known to target humpback whales, particularly calves, off Ningaloo Reef during the humpback southern migration season (Pitman <i>et al.</i>, 2015). Overall, observations suggest that humpback calves are a predictable, plentiful, and readily taken prey source for killer whales off Ningaloo Reef for at least five months of the year. Additionally, there are records of killer whales attacking dugongs in Shark Bay (Anderson and Prince, 1985). However, there are no recognised key localities or important habitats for killer whales within the NWMR (DSEWPAC, 2012a). There are no identified BIAs for this species in the NWMR.</p>
Australian snubfin dolphin	<p>Stranding and museum specimen records indicate that Australian snubfin dolphins occur only in waters off northern Australia, from approximately Broome on the west coast to the Brisbane River on the east coast (Parra <i>et al.</i>, 2002). Aerial and boat-based surveys indicate that Australian snubfin dolphins occur mostly in protected shallow waters close to the coast, and close to river and creek mouths (Parra, 2006; Parra <i>et al.</i>, 2006; Parra <i>et al.</i>, 2002). Within the NWMR, species has been found in the shallow coastal waters and estuaries along the Kimberley coast. Beagle and Pender bays on the Dampier Peninsula, and tidal creeks around Yampi Sound and between Kuri Bay and Cape Londonderry are important areas for Australian snubfin dolphins (DEWHA, 2008). Roebuck Bay has generally been considered the south-western limit of snubfin dolphin distribution across northern Australia, but the species has been recorded in Port Hedland harbour, the Dampier Archipelago, Montebello Islands, Exmouth Gulf and off North-west Cape (Allen <i>et al.</i>, 2012). A first comprehensive catalogue of snubfin dolphin sightings has been compiled for the Kimberley, north-west Western Australia (Bouchet <i>et al.</i>, 2021) and documented that snubfin dolphins are consistently encountered in shallow water (<21 m depth) close to (<15 km) freshwater inputs with high detection rates in known hotspots such as Roebuck Bay and Cygnet Bay as well as suitable coastal habitat in the wider Kimberley region. Refer Table 7-3 and Figure 7-3 for the location and type of BIAs for Australian snubfin dolphins in the NWMR.</p>
Indo-Pacific humpback dolphin (Australian humpback dolphin)	<p>Previously included with <i>Sousa chinensis</i>, the Australian humpback dolphin (<i>S. sahulensis</i>) was elevated to a species in 2014. <i>S. chinensis</i> is now applied for humpback dolphins in the eastern Indian and western Pacific Oceans and <i>S. sahulensis</i> for humpback dolphins in the waters of the Sahul Shelf from northern Australia to southern New Guinea (Jefferson and Rosenbaum, 2014). The Australian humpback dolphin is listed as <i>S. chinensis</i> under EPBC Act.</p> <p>The Australian humpback dolphin (referred to as 'humpback dolphin' hereafter) inhabits the tropical/subtropical waters of the Sahul Shelf across northern Australia and southern Papua New Guinea (Jefferson and Rosenbaum, 2014). Based on historical stranding data, museum specimens and opportunistic sightings collected during aerial and boat-based surveys for other fauna it has been inferred that humpback dolphins occur from the W/ANT border south-west to Shark Bay (Hanf <i>et al.</i>, 2016). Allen <i>et al.</i> (2012) suggested that humpback dolphins use a range of inshore habitats, including both clear and turbid coastal waters across northern WA. The waters surrounding North-west Cape are an important area for the species. Boat-based surveys up to 5 km out from the coast (Brown <i>et al.</i>, 2012) recorded humpback dolphins from 0.3 to 4.5 km away from shore and in depths ranging from 1.2 to 20 m, with a mean of ~8 m. Other studies around North-west Cape, surveying waters up to 5 km from the coast, recorded humpback dolphins in water depths of up to 40 m (Hanf <i>et al.</i>, 2016). Based on density, site fidelity and residence patterns, North-west Cape is clearly an important habitat toward the south-western limit of this species' range (Hunt <i>et al.</i>, 2017).</p> <p>Aerial surveys targeting dugongs over the western Pilbara have recorded humpback dolphins more than 60 km from the mainland in shallow shelf waters (i.e. <30 m deep) near Barrow Island and the western Lowendal Islands (Hanf, 2015). The species has also been recorded in fringing coral reef and shallow, sheltered sandy lagoons at the Montebello Islands (Raudino <i>et al.</i>, 2018). Over the past ten years a number of studies have focused on populations of humpback dolphins along the Kimberley coast, including Roebuck Bay, the Dampier Peninsula, Cone Bay, Yampi Sound, Prince Regent River and the Cambridge Gulf (Brown <i>et al.</i>, 2016).</p> <p>Refer Table 7-3 and Figure 7-4 for the location and type of BIAs for Indo-Pacific humpback dolphins in the NWMR.</p>
Indo-Pacific bottlenose dolphin (Spotted bottlenose dolphin)	<p>There are four known sub-populations of spotted bottlenose dolphins, of which the Arafura/Timor Sea populations were identified as potentially occurring within the NWMR. The species is restricted to inshore areas such as bays and estuaries, nearshore waters, open coast environments, and shallow offshore waters including coastal areas around oceanic islands, from Shark Bay to the western edge of the Gulf of Carpentaria. The species</p>

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Species	Key Information
	<p>forages in a range of habitats but is generally restricted to water depths of less than 200 m (DSEWPAC, 2012a). Important foraging/breeding areas include the shallow coastal waters and estuaries along the Kimberley coast and Roebuck Bay. Refer Table 7-3 the location and type of BIAs for spotted bottlenose dolphins in the NWMR.</p>
Dugong	<p>Dugongs are distributed along the WA coast throughout the Gascoyne, Pilbara and Kimberley. Specific areas supporting dugong populations include: Shark Bay; Ningaloo and Exmouth Gulf; the Pilbara coast (Exmouth Gulf to De Grey River [Marsh <i>et al.</i>, 2002]); and Eighty Mile Beach and the Kimberley coast, including Roebuck Bay (Brown <i>et al.</i>, 2014). Dugong distribution is correlated with the seagrass habitats upon which it feeds, although water temperature has also been correlated with dugong movements and distribution (Preen <i>et al.</i>, 1997; Preen, 2004). Dugongs are known to migrate between seagrass habitats (hundreds of kilometres) (Sheppard <i>et al.</i>, 2006), and in Shark Bay they exhibit seasonal movements as a behavioural thermoregulatory response to winter water temperatures (Holley <i>et al.</i>, 2006; Marsh <i>et al.</i>, 2011). Aerial surveys since the mid-1980s indicate that dugong populations are now stable at a regional scale in Shark Bay and in the Exmouth/Ningaloo Reef. Refer Table 7-3 and Figure 7-5 for the location and type of BIAs for dugong in the NWMR.</p>
Australian sea lion	<p>Pinnipeds</p> <p>The Australian sea lion is the only endemic pinniped (true seals, fur seals and sea lions) in Australian waters. It is a member of the Otariidae (eared seals) family. The birth interval in Australian sea lions is around 17–18 months. The Australian sea lion is unique among pinnipeds in being the only species that has a non-annual breeding cycle that is also temporally asynchronous across its range (DSEWPAC, 2013a; Threatened Species Scientific Committee, 2020a). This means the breeding period (copulation and birthing) in one colony will occur at different times to breeding in another colony. The Australian sea lion is considered to be a specialised benthic forager—that is, it feeds primarily on the sea floor. Studies have shown that the species will eat a range of prey, including fish, cephalopods (squid, cuttlefish and octopus), sharks, rays, rock lobsters and penguins (DSEWPAC, 2013a; Threatened Species Scientific Committee, 2020a). The Australian sea lion feeds on the continental shelf, most commonly in depths of 20–100 m, and they typically travel up to about 60 km from their colony on each foraging trip, with a maximum distance of around 190 km when over shelf waters.</p> <p>The current breeding distribution of the Australian sea lion extends from the Houtman Abrolhos Islands on the west coast of WA to the Pages Islands in SA. Sites for the 58 breeding colonies occurring in WA and SA are designated as habitat critical to the survival of the species under the Recovery Plan for the Australian sea lion (DSEWPAC, 2013a). Of these, four are located in the SWMR along the west coast of WA: Abrolhos Islands (Easter Group), Beagle Island, North Fisherman Island and Buller Island. There are also a number of foraging BIAs for both males and females along the west coast, extending from the Abrolhos Islands south to Rockingham.</p> <p>There is no designated habitat critical to survival or identified BIAs for this species in the NWMR. Figure 7-6 shows the foraging BIAs for the Australian sea lion to the south of the NWMR.</p>

7.5 Biological Important Areas in the NWMR

BIAs representing important life cycle stages and behaviours for six species of marine mammal in the NWMR: the humpback whale, the pygmy blue whale, Australian snubfin dolphin, Australian humpback dolphin, spotted bottlenose dolphin and dugong, are presented in **Table 7-3**.

Table 7-3 Marine mammal BIAs within the NWMR

Species	Woodside Activity Area			BIAs					
	Browse	NWS/S	NWC	Resting	Foraging	Breeding	Calving	Migration	
Humpback whale ¹	✓	✓	✓	Shark Bay Exmouth Gulf (north migration – early June) (south migration – late Aug to Oct) Southern Kimberley region	No foraging BIA identified within the NWMR	Kimberley coast from the Lacepede Islands to north of Camden Sound (mid Aug – early Sept)	Core calving in waters off the Kimberley coast from the Lacepede Islands to north of Camden Sound (mid Aug – early Sept)	Southern border of the NWMR to north of the Kimberley (arrive June)	
Blue whale and Pygmy blue whale ¹ ²	✓	✓	✓	No resting BIA identified within the NWMR	Possible foraging areas off Ningaloo and Scott Reef	No breeding BIA identified within the NWMR	No calving BIA identified within the NWMR	Augusta to Derby. Along the shelf edge at depths of 500 m to 1000 m; appear close to Ningaloo coast Montebello Islands area on southern migration (north: April – Aug) (south: Oct – late Dec)	
Australian snubfin dolphin ¹	✓	✓	-	No resting BIA identified within the NWMR	Roebuck Bay Cambridge Gulf Camden Sound area King Sound (south) King Sound (north) Yampi Sound Talbot Bay Maret Islands Bigge Island Admiralty Gulf Parry Harbour Maret Islands Bigge Island Admiralty Gulf Parry Harbour Bougainville Peninsula Vansittart Bay Anjo Peninsula Napier Broome Bay Deep Bay Vansittart Bay Anjo Peninsula Napier	Roebuck Bay Cambridge Gulf Camden Sound area King Sound (south) King Sound (north) Yampi Sound Talbot Bay Maret Islands Bigge Island Admiralty Gulf Parry Harbour Bougainville Peninsula Vansittart Bay, Anjo Peninsula Napier Broome Bay Deep Bay Prince Regent River King George River Cape Londonderry	Roebuck Bay Cambridge Gulf Camden Sound area King Sound (south) King Sound (north) Yampi Sound Talbot Bay Maret Islands Bigge Island Admiralty Gulf Parry Harbour Bougainville Peninsula Vansittart Bay Anjo Peninsula Napier Broome Bay Deep Bay Prince Regent River	No migration BIA identified within the NWMR	

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Species	Woodside Activity Area			BIAs				
	Browse	NWS/S	NWC	Resting	Foraging	Breeding	Calving	Migration
Indo-Pacific humpback dolphin	✓	✓	-	No resting BIA identified within the NWMR	Broome Bay Deep Bay Prince Regent River King George River Cape Londonderry Ord River Roebuck Bay Willie Creek Prince Regent River King Sound (north) Yampi Sound Talbot Bay Walcott Inlet Talbot Bay Walcott Inlet Doubtful Bay Deception Bay Augustus Island Maret Islands Bigge Island King Sound, southern sector Vansittart Bay, Anjo Peninsula	Ord River Roebuck Bay Willie Creek Prince Regent River King Sound (north) Yampi Sound Talbot Bay Walcott Inlet Doubtful Bay Deception Bay Augustus Island	King George River Cape Londonderry Ord River Roebuck Bay Willie Creek Prince Regent River	No migration BIA identified within the NWMR
Spotted bottlenose dolphin	✓	✓	✓	No resting BIA identified within the NWMR	Roebuck Bay Cambridge Gulf Camden Sound area King Sound (south) King Sound (north) Yampi Sound	Roebuck Bay Cambridge Gulf Camden Sound area King Sound (south) King Sound (north) Yampi Sound	No calving BIA identified within the NWMR	No migration BIA identified within the NWMR

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Species	Woodside Activity Area			BIAs				
	Browse	NWS/S	NWC	Resting	Foraging	Breeding	Calving	Migration
Dugong ¹	✓	✓	✓	No resting BIA identified within the NWMR	Exmouth Gulf Ningaloo Reef Shark Bay Roebuck Bay Dampier Peninsula	No breeding BIA identified within the NWMR	Exmouth Gulf Ningaloo Reef Shark Bay	Not listed as a migratory species

¹. DSEWPAC (2012a)

². Commonwealth of Australia (2015a)

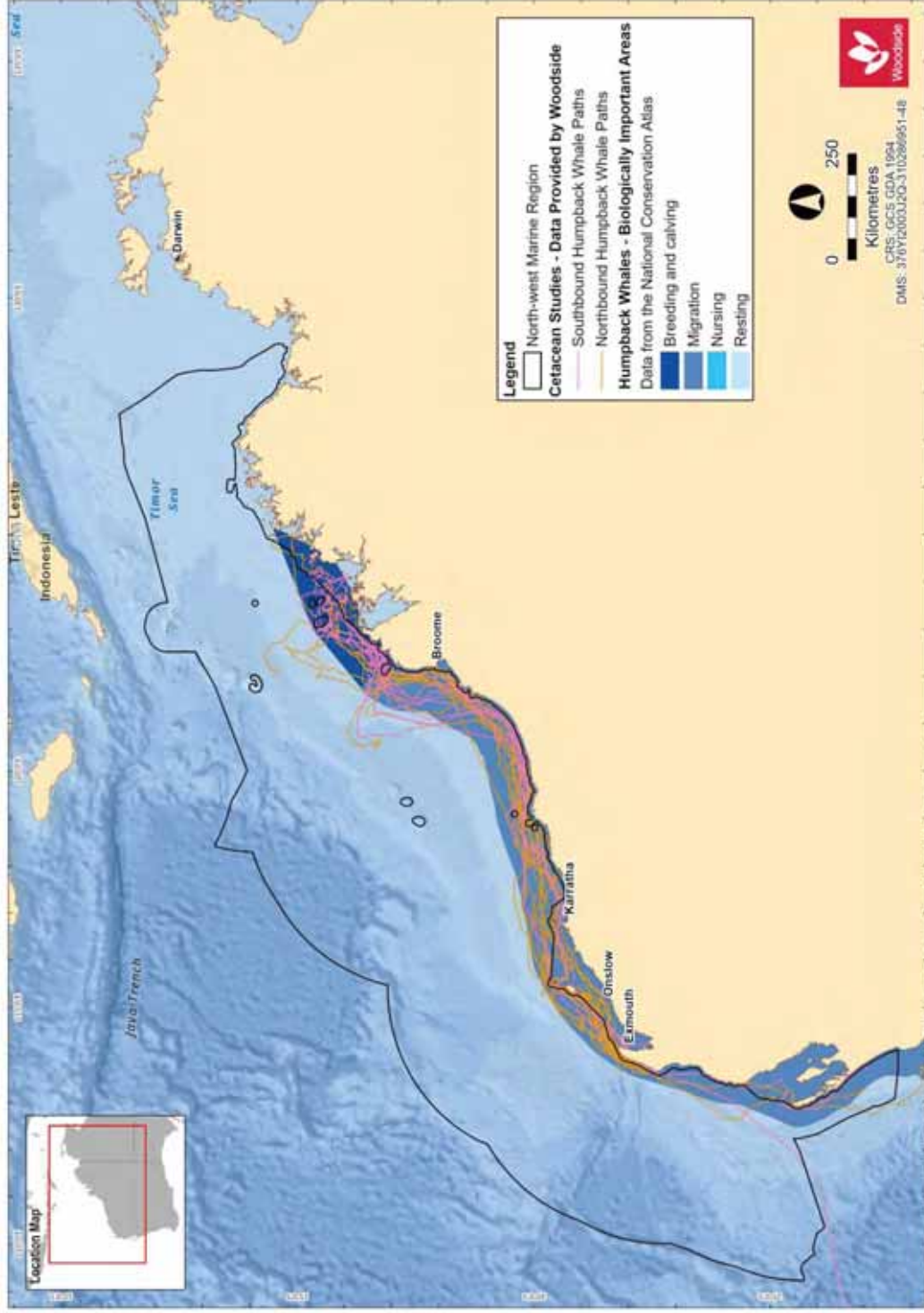


Figure 7-1 Humpback whale BIAs for the NWMR and tagged tracks for north and south bound migrations

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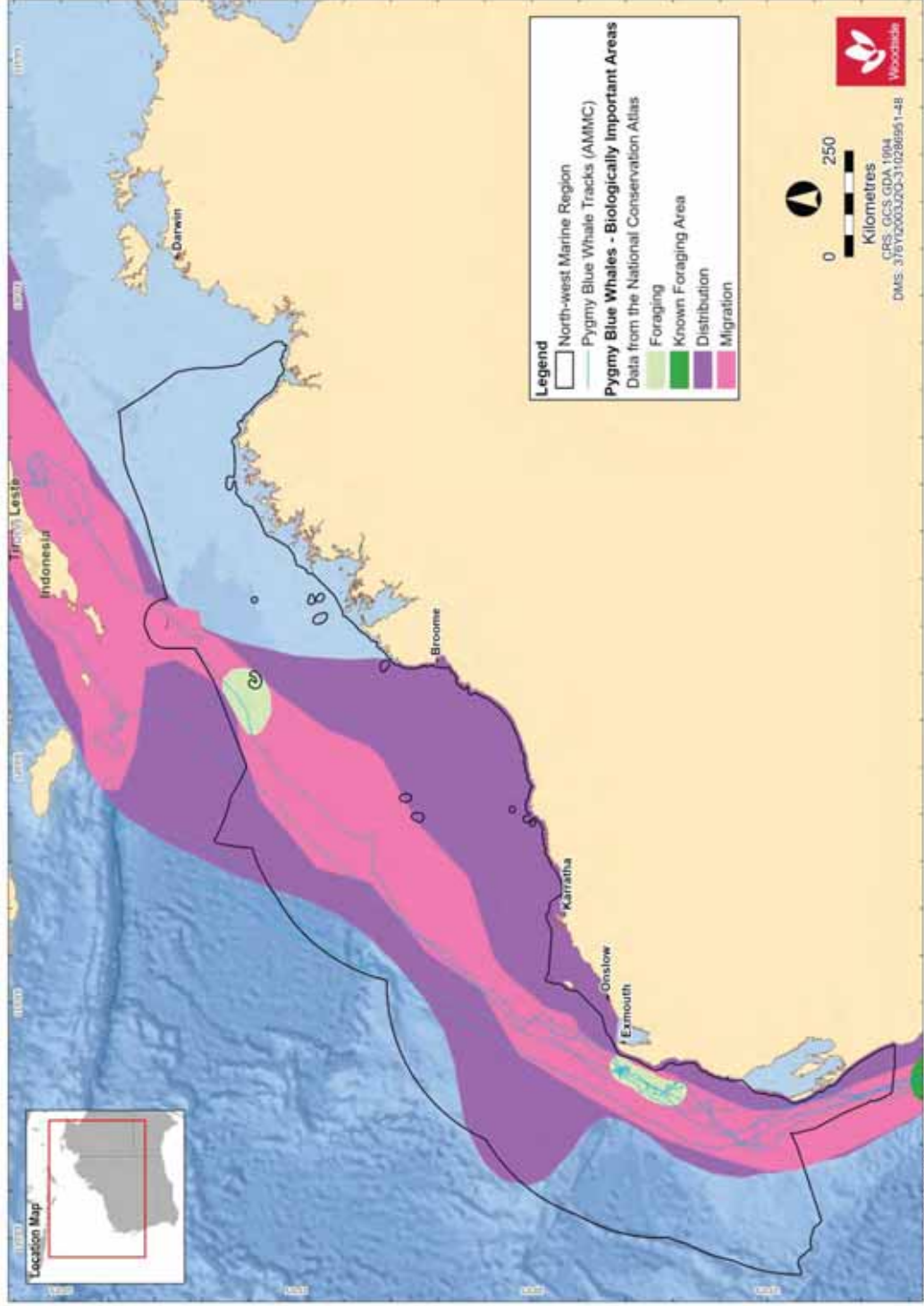


Figure 7-2 Pygmy blue whale BIAs for the NWMR and tagged whale tracks for northbound migration

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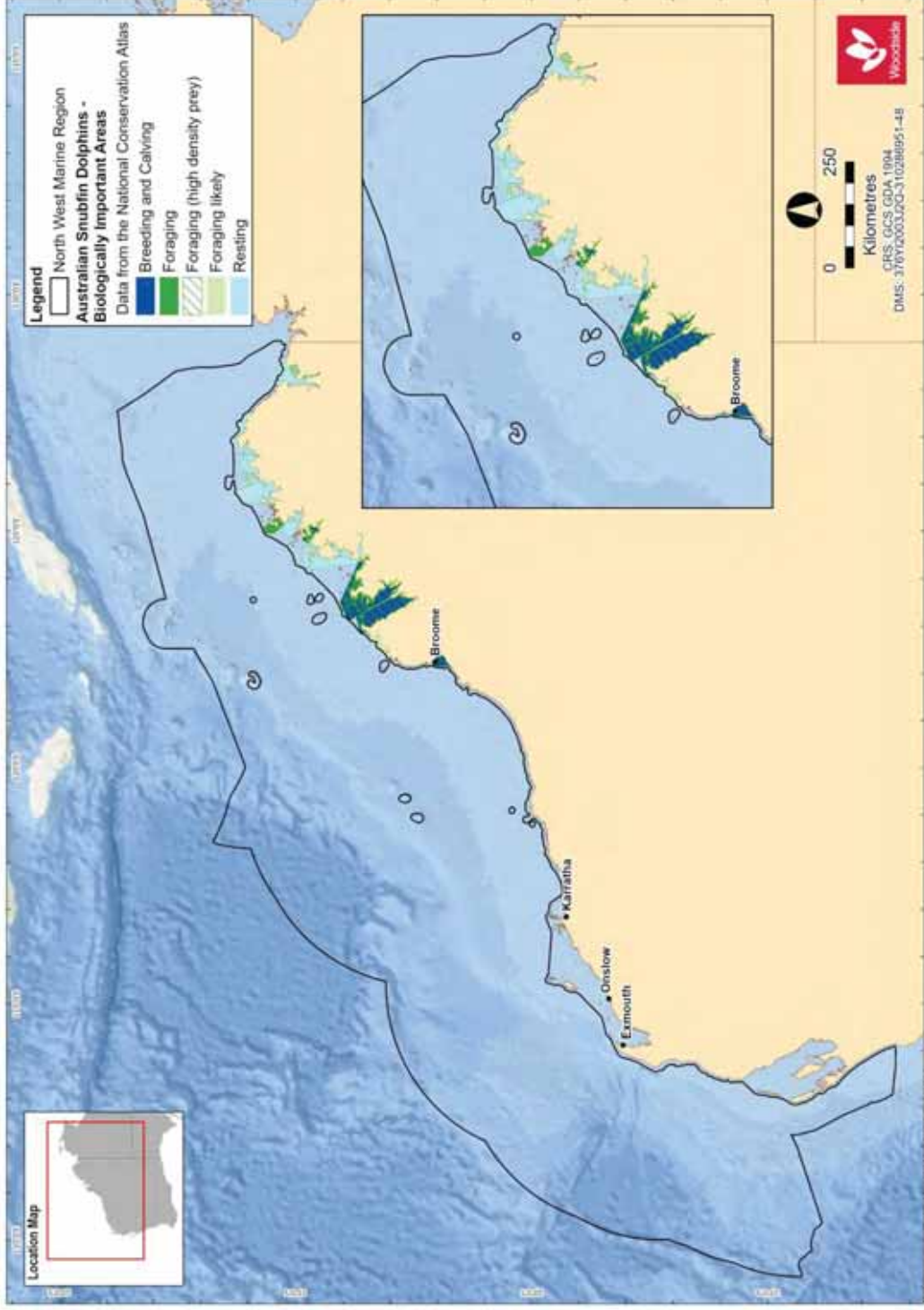


Figure 7-3 Australian snubfin dolphin BIAS for the NWMR

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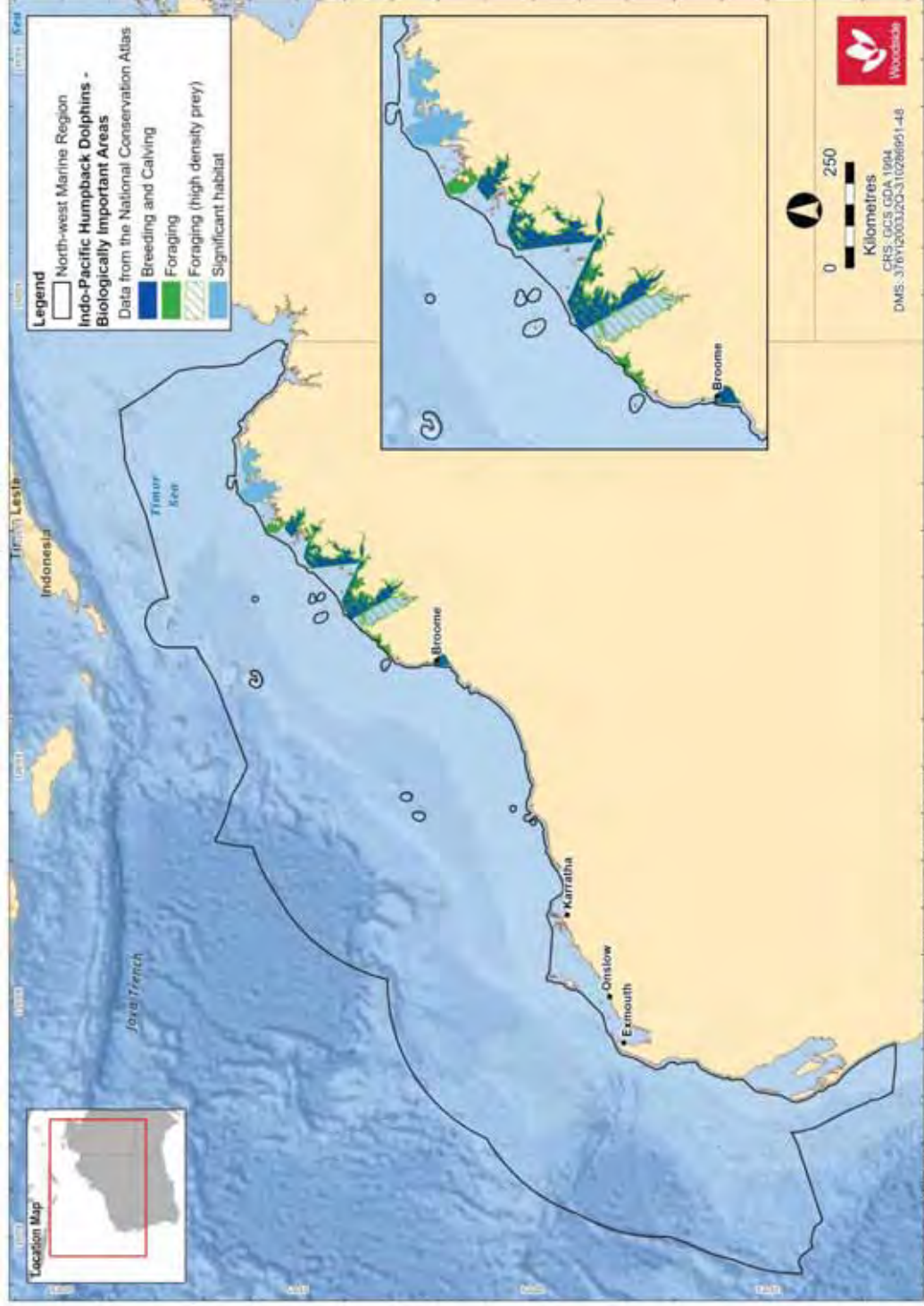


Figure 7-4 Indo-Pacific humpback dolphin BIAs for the NWMR

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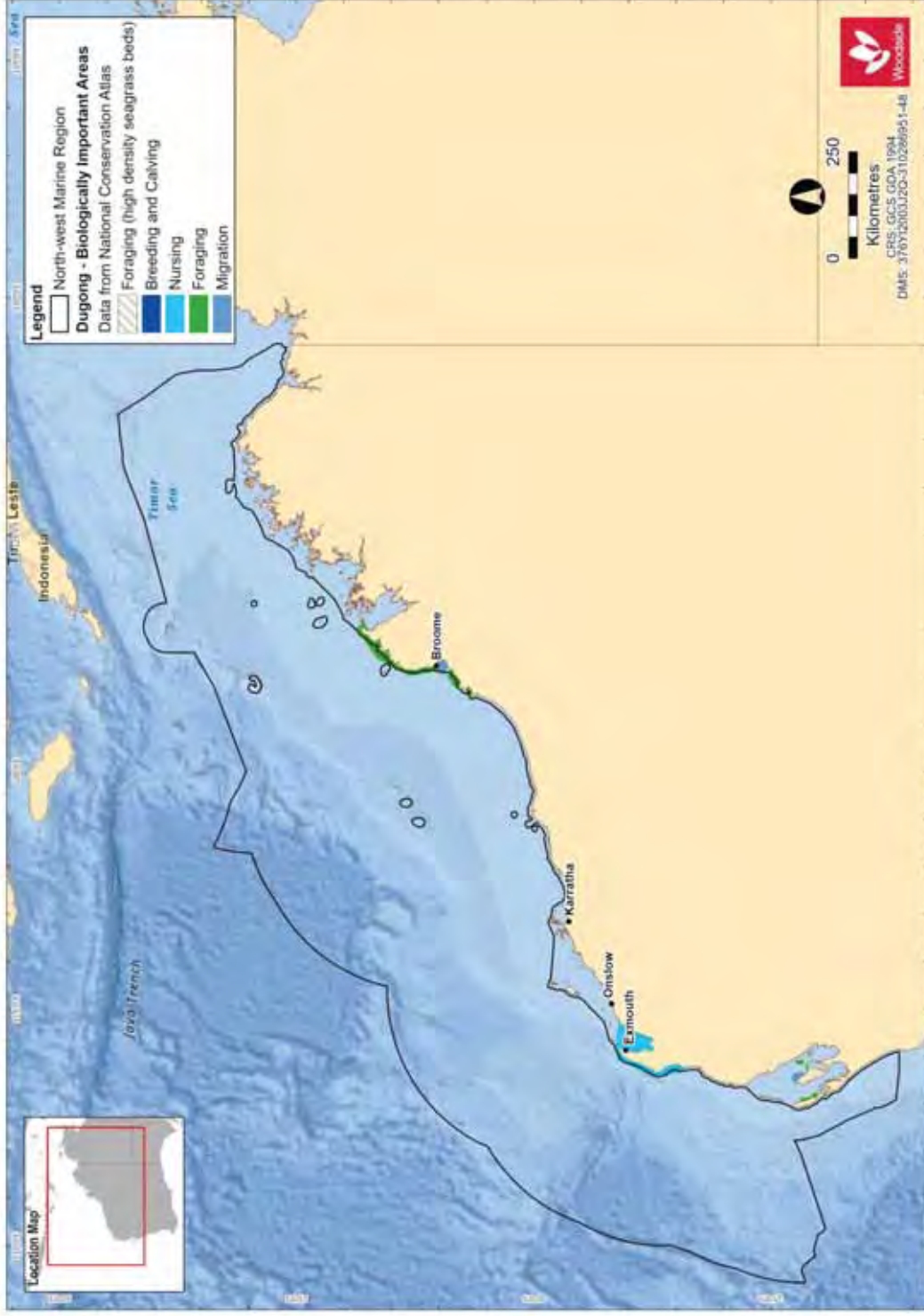


Figure 7-5 Dugong BIAs for the NWMR

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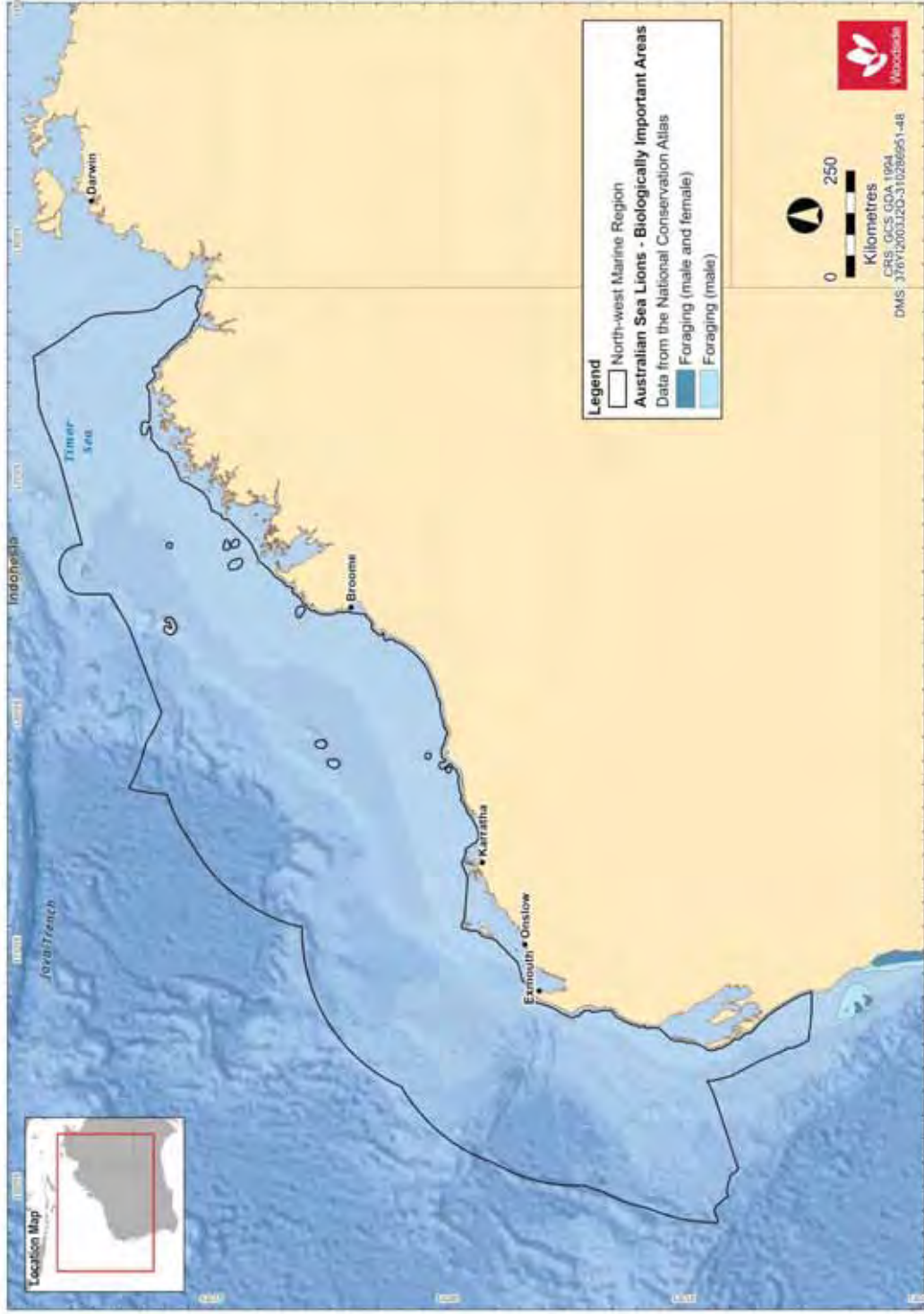


Figure 7-6 Australian sea lion BIAs in the northern extent of the SWMR closest to the NWMR

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7.6 Marine Mammal Summary for the NWMR

7.6.1 Browse

The Browse activity area includes biologically important habitat for five threatened and/or migratory marine mammal species:

- blue whale and pygmy blue whale (foraging and migration areas);
- humpback whale (breeding, calving and migration areas);
- Indo-Pacific humpback dolphin (foraging, breeding and calving areas);
- Australian snubfin dolphin (foraging, breeding and calving areas); and
- dugong (foraging).

BIAs for the marine mammal species are outlined in **Table 7-3**.

7.6.2 North-west Shelf / Scarborough

The NWS / Scarborough activity area includes biologically important habitat for five threatened and/or migratory marine mammal species:

- blue whale and pygmy blue whale (foraging and migration areas);
- humpback whale (resting and migration areas);
- Indo-Pacific humpback dolphin (foraging, breeding and calving areas);
- Australian snubfin dolphin (foraging, breeding and calving areas); and
- dugong (foraging and calving areas).

BIAs for the marine mammal species are outlined in **Table 7-3**.

7.6.3 North-west Cape

The North-west Cape activity area includes biologically important habitat for three threatened and/or migratory marine mammal species:

- blue whale and pygmy blue whale (foraging and migration areas);
- humpback whale (resting and migration areas); and
- dugong (foraging and calving areas).

BIAs for the marine mammal species are outlined in **Table 7-3**.

8. SEABIRDS AND MIGRATORY SHOREBIRDS OF THE NWMR

8.1 Regional Context

The NWMR supports high numbers and species diversity of seabirds and migratory shorebirds including many that are EPBC Act listed, threatened and migratory. The NWMR marine bioregional plan reported 34 seabird species (listed as threatened, migratory and/or marine) that are known to occur, and 30 of 37 species of migratory shorebird species that regularly occur in Australia, are recorded at Ashmore Reef in the NWMR (DSEWPAC, 2012e). The NWMR marine bioregional plan also noted that Roebuck Bay and Eighty Mile Beach are internationally significant and recognised migratory shorebird locations.

Many migratory seabirds and shorebirds are protected through bilateral agreements between Australia and Japan (JAMBA), China (CAMBA) and the Republic of Korea (ROKAMBA), recognising the migratory route and important stopover and resting habitats of the East Asian-Australasian Flyway (EAAF). Important migratory bird habitats are also recognised as part of protected wetlands of the international significance under the Ramsar Convention. Important Bird Areas (IBAs) for the NWMR, which are also recognised as global Key Biodiversity Areas (KBAs) (BirdLife Australia⁴), include:

- Roebuck Bay KBA (and Ramsar site): Internationally significant migratory shorebird species.
- Mandora Marsh and Anna Plains KBA (adjacent to Eighty Mile Beach, Ramsar site): Internationally significant migratory shorebird species.
- Dampier Saltworks KBA: Internationally significant migratory shorebird species.
- Montebello Islands KBA: Shorebird and seabird species.
- Barrow Island KBA: Shorebird and seabird species.
- Exmouth Gulf Mangroves KBA: Internationally significant migratory shorebird species.

Table 8-1 presents a list of the threatened and migratory seabird and shorebird species that occur within the NWMR, with their conservation status and relevant recovery plans and/or conservation advice.

4

[https://www.birdlife.org.au/projects/KBA#:~:text=The%20Key%20Biodiversity%20Areas%20\(KBAs.of%20advocacy%20for%20protected%20areas](https://www.birdlife.org.au/projects/KBA#:~:text=The%20Key%20Biodiversity%20Areas%20(KBAs.of%20advocacy%20for%20protected%20areas).

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Table 8-1. Bird species (threatened/migratory) identified by the EPBC Act PMST and other sources of information as potentially occurring within the NWMR

Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
Seabirds							
<i>Macronectes giganteus</i>	Southern giant petrel	Endangered	Migratory	Marine	Migratory	National recovery plan for threatened albatrosses and giant petrels 2011-2016 (DSEWPAC, 2011c)	
<i>Papasula abbotti</i>	Abbott's booby	Endangered	N/A	Marine	N/A	Conservation Advice for the Abbott's booby - <i>Papasula abbotti</i> (Threatened Species Scientific Committee, 2020b)	
<i>Pterodroma mollis</i>	Soft-plumaged petrel	Vulnerable	N/A	Marine	N/A	Conservation Advice <i>Pterodroma mollis</i> soft-plumaged petrel (Threatened Species Scientific Committee, 2015f)	
<i>Sternula nereis nereis</i>	Australian fairy tern	Vulnerable	N/A	N/A	Vulnerable	Conservation Advice for <i>Sternula nereis nereis</i> (Fairy Tern) (DSEWPAC, 2011d)	
<i>Anous tenuirostris melanops</i>	Australian lesser noddy	Vulnerable	N/A	Marine	Endangered	Conservation Advice <i>Anous tenuirostris melanops</i> Australian lesser noddy (Threatened Species Scientific Committee, 2015e)	
<i>Thalassarche carteri</i>	Indian yellow-nosed albatross	Vulnerable	Migratory	Marine	Endangered	National recovery plan for threatened albatrosses and giant petrels 2011-2016 (DSEWPAC, 2011c)	
<i>Anous stolidus</i>	Common noddy	N/A	Migratory	Marine	Migratory	Draft Wildlife Conservation Plan for Seabirds (Commonwealth of Australia, 2019)	
<i>Fregata ariel</i>	Lesser frigatebird	N/A	Migratory	Marine	Migratory		
<i>Fregata minor</i>	Great frigatebird	N/A	Migratory	Marine	Migratory		
<i>Sula leucogaster</i>	Brown booby	N/A	Migratory	Marine	Migratory		
<i>Sula sula</i>	Red-footed booby	N/A	Migratory	Marine	Migratory		

Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
<i>Onychoprion anaethetus</i> (listed as <i>Sterna anaethetus</i>)	Bridled tern	N/A	Migratory	Marine	Migratory		
<i>Thalasseus bergii</i>	Greater crested tern	N/A	Migratory	Marine	Migratory		
<i>Sterna albifrons</i>	Little tern	N/A	Migratory	Marine	Migratory		
<i>Sterna dougalli</i>	Roseate tern	N/A	Migratory	Marine	Migratory		
<i>Onychoprion fuscata</i>	Sooty tern	N/A	N/A	Marine	N/A		
<i>Hydroprogne caspia</i>	Caspian tern	N/A	Migratory	Marine	Migratory		
<i>Ardenna pacifica</i>	Wedge-tailed shearwater	N/A	Migratory	Marine	Migratory		
<i>Puffinus assimilis</i>	Little shearwater	N/A	N/A	Marine	N/A		
<i>Ardenna carneipes</i>	Flesh-footed shearwater	N/A	Migratory	Marine	Vulnerable		
<i>Calonectris leucomelas</i>	Streaked shearwater	N/A	Migratory	Marine	Migratory		
<i>Phaethon lepturus</i>	White-tailed tropicbird	N/A	Migratory	Marine	Migratory		
<i>Chroicocephalus novaehollandiae</i>	Silver gull	N/A	N/A	Marine	N/A		
Migratory shorebirds							
<i>Numenius madagascariensis</i>	Eastern curlew, Far Eastern curlew	Critically endangered	Migratory	Marine	Migratory	Critically endangered	Conservation Advice <i>Numenius madagascariensis</i> eastern curlew (DOE, 2015a)
<i>Calidris ferruginea</i>	Curlew sandpiper	Critically endangered	Migratory	Marine	Migratory	Critically endangered	Conservation Advice <i>Calidris ferruginea</i> curlew sandpiper (DOE, 2015b)
<i>Calidris tenuirostris</i>	Great knot	Critically endangered	Migratory	Marine	Migratory	Critically endangered	Conservation Advice <i>Calidris tenuirostris</i> Great knot (Threatened Species Scientific Committee, 2016a)
<i>Limosa lapponica menzbieri</i>	Bar-tailed godwit (<i>menzbieri</i>)	Critically endangered	Migratory	Marine	Migratory	Critically endangered	Conservation Advice <i>Limosa lapponica menzbieri</i> Bar-tailed godwit (northern Siberia) (Threatened Species Scientific Committee, 2016c)

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Species Name	Common Name	Environment Protection and Biodiversity Conservation Act 1999			WA Biodiversity Conservation Act 2016		EPBC Act Part 13 Statutory Instrument
		Threatened Status	Migratory Status	Listed	Conservation Status		
<i>Calidris canutus</i>	Red knot	Endangered	Migratory	Marine	Endangered	Conservation Advice <i>Calidris canutus</i> Red knot (Threatened Species Scientific Committee, 2016b)	
<i>Charadrius mongolus</i>	Lesser sand plover	Endangered	Migratory	Marine	Endangered	Conservation Advice <i>Charadrius mongolus</i> Lesser sand plover (Threatened Species Scientific Committee, 2016e)	
<i>Charadrius leschenaultii</i>	Greater sand plover	Vulnerable	Migratory	Marine	Vulnerable	Conservation Advice <i>Charadrius leschenaultii</i> Greater sand plover (Threatened Species Scientific Committee, 2016d)	
All migratory shorebird species	Wildlife Conservation Plan for Migratory Shorebirds (Commonwealth of Australia, 2015c).						

8.2 Seabirds in the NWMR

Seabirds are birds that are adapted to life within the marine environment (oceanic and coastal) and are generally long-lived, have delayed breeding and have fewer young than other bird species (Commonwealth of Australia, 2019). At least 34 seabird species listed as threatened, migratory and/or marine under the EPBC Act are known to occur regularly in the NWMR and include a variety of species of terns, noddies, petrels, shearwaters, frigatebirds, and boobies. Many of these species spend most of their lives at sea (predominately pelagic species), ranging over large distances to forage. These pelagic species only come onshore to breed and raise chicks at natal or high-fidelity breeding colonies on remote, offshore island locations in and adjacent to the NWMR. Many species are ecologically significant to the NWMR, as they are endemic to the region, can be present in large numbers in breeding seasons and non-breeding seasons, and many exhibit extensive annual migrations that include marine areas outside the Australian EEZ (DSEWPAC, 2012e).

The presence of seabirds within the NWMR is influenced by seabird species that migrate and forage in the area during the non-breeding season and this includes many seabird species that breed on the Houtman Abrolhos in the SWMR. Pelagic seabirds have been documented foraging at current boundaries and seasonal upwellings within the NWMR (refer to Sutton *et al.*, 2019). The Houtman Abrolhos Islands National Park located in the SWMR, is one of the most significant seabird breeding locations in the eastern Indian Ocean. Sixteen (16) species of seabirds breed there. Eighty percent of common (brown) noddies, 40% of sooty terns and all the lesser noddies found in Australia nest at the Houtman Abrolhos (Surman, 2019). Important seabird areas in the NWMR are as identified by the KBAs (refer to **Section 8.1**) and the information on a select number of seabird species documented for the NWMR (based on the screening criteria presented in **Section 3**), as presented in **Table 8-2**.

Table 8-2 Information on threatened/migratory seabird species of the NWMR

Species	Key Information
Seabirds	
Southern giant petrel	This species is included in the National recovery plan for threatened albatrosses and giant petrels. Habitat critical to survival is defined for breeding and foraging. There are six known breeding localities under Australian jurisdiction (for all species giant petrels) and all are located in the Southern Ocean including islands off Tasmania and within the Australian Antarctic Territory (DSEWPAC, 2011c). Habitat critical to survival identified for foraging is defined as waters south of 25 degrees latitude. The giant petrel species distribution is mainly within the Southern Ocean but this species does migrate into subtropical waters during the winter and its distribution includes the southern extent of the NWMR. No BIAs for this species are located in the NWMR.
Abbott's booby	The Abbott's booby is a large, long-lived seabird known to nest only at Christmas Island. The recovery of this species is strongly dependent on the protection of breeding habitat defined habitat critical to the survival of this species on Christmas Island (Threatened Species Scientific Committee, 2020b). This species spends much of its time at sea and known to forage over large distances offshore when nesting and its range includes off the coast of Java, near the Chagos and in the Banda Sea, and may possibly extend into the north-western extent of the NWMR. No BIAs for this species are located in the NWMR.
Soft-plumaged petrel	This petrel species breeds only at two locations in Australian waters within the Southern Ocean (one off Tasmania and Macquarie Island) (Threatened Species Scientific Committee, 2015f). As a mainly sub-Antarctic species they are usually distributed in cooler seas but distribution extends into subtropical waters and its known distribution includes the southern extent of the NWMR. No BIAs for this species are located in the NWMR.
Australian fairy tern	The Australian fairy tern is listed as Vulnerable for the sub-species only recorded for WA. It has a coastal distribution from Sydney, south to Tasmania and around southern WA up to the Dampier Archipelago and out on the offshore island groups of Barrow, Montebello and the Lowendals (DSEWPAC, 2011d). The Australian fairy tern feeds on small baitfish and roosts and nests on sandy beaches below vegetation. These behaviours, generally, occur in inshore waters of island archipelagos and on the Australian mainland shores and adjacent wetlands. Fairy terns breed from August to February. The Australian fairy tern is unlikely to be present

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Species	Key Information
	within the offshore environment of the NWMR. The largest breeding colony in Western Australia for this species is in the Houtman Abrolhos Islands, SWMR (Surman, 2019). For the description and location of BIAs in the NWMR, refer to Table 8-3 and Figure 8-2 .
Australian lesser noddy	The Houtman Abrolhos, WA is an important breeding habitat for the Australian lesser noddy in the eastern Indian Ocean. This species exhibits nesting habitat specialisation (white mangrove stands) and has a limited foraging range during the breeding season. Furthermore, the lesser noddy forages over shelf waters and appears not to disperse over their non-breeding period as they remain largely in the general vicinity or slightly to the south of the colony in the non-breeding season (February to September; Surman <i>et al.</i> , 2018). No BIAs for this species are located in the NWMR.
Indian yellow-nosed albatross	This species is included in the National recovery plan for threatened albatrosses and giant petrels. Habitat critical to survival is defined for breeding and foraging. There are six known breeding localities under Australian jurisdiction (for all species of albatrosses) and all are located in the Southern Ocean including islands off Tasmania and within the Australian Antarctic Territory (DSEWPAC, 2011c). Habitat critical to survival identified for foraging is defined as waters south of 25 degrees latitude. All albatross species distribution (including the Indian yellow-nose albatross) is mainly within the Southern Ocean but this species does migrate into subtropical waters during the winter and its distribution includes the southern extent of the NWMR. No BIAs for this species are located in the NWMR.
Common noddy	This species is listed as migratory and marine. The common (or brown) noddy is the largest species of noddy found in Australian waters. The species is widespread in tropical and subtropical areas beyond Australia. This seabird species is gregarious and normally occurs in flocks, up to hundreds of individuals, when feeding or roosting. The Houtman Abrolhos, WA is the primary breeding habitat for the common noddy in the Eastern Indian Ocean. This species spends their non-breeding season (March to August) in the NWS area, around 950 km north from the breeding colony (Surman <i>et al.</i> 2018). The species occurs within NWMR waters, particularly around offshore islands such as the Montebello Island group. This species is recorded on unmanned oil and gas platforms within the NWS. No BIAs for this species are located in the NWMR.
Lesser frigatebird Great frigatebird	Both species of frigatebird are listed as migratory and marine. Within the NWMR, the lesser frigatebird is known to breed on Adele, Bedout and West Lacepede islands, Ashmore Reef and Cartier Island (Commonwealth of Australia, 2019). The lesser frigatebird feeds mostly on fish and sometimes cephalopods, and all food is taken while the bird is in flight. Lesser frigatebirds generally forage close to breeding colonies. Breeding/foraging BIAs for the lesser frigatebird are located in the NWMR; refer to Table 8-3 .
Brown booby	The brown booby is the most common booby, occurring throughout all tropical oceans bounded by latitudes 30° N and 30° S. There are large colonies on offshore islands within the NWMR such as the Lacepede Islands (one of the largest colonies in the world), Ashmore Reef, and other offshore Kimberley islands. This seabird species is a specialised plunge diver, mostly eating fish and some cephalopods (Commonwealth of Australia, 2019). Breeding/foraging BIAs for the brown booby are located in the NWMR; refer to Table 8-3 and Figure 8-3 .
Red-footed booby	Within the NWMR, its known breeding sites for this species include Ashmore Reef and Cartier Island. It is a pelagic species and generally occurs away from land. It mainly eats flying fish and squid. Prey abundance is reliant on the high productivity in slope areas off remote islands where the birds breed (Commonwealth of Australia, 2019). Breeding/foraging BIAs for the red-footed booby are located in the NWMR; refer to Table 8-3 and Figure 8-3 .
Greater crested tern	The greater crested tern has a widespread distribution recorded on islands and coastlines of tropical and subtropical areas, ranging from the Atlantic coast of South Africa, Indian Ocean and through south-east Asia and Australia. Outside the breeding season it can be found at sea throughout its range, with the exception of the central Indian Ocean (Commonwealth of Australia, 2019). The largest breeding colony in WA for this species is the Houtman Abrolhos Islands, SWMR (Surman, 2019). No BIAs for this species are located in the NWMR.
Little tern	There are three sub-populations of this species in Australia and two of these occur in the NWMR: northern Australian breeding sub-population occurring around Broome and extending across in to the NMR, and an east Asian breeding sub-population, with the terns present from Shark Bay to south-eastern Queensland during the austral summer. Little terns

Species	Key Information
	usually forage close to breeding colonies in the shallow water of estuaries (Commonwealth of Australia, 2019). For the description and location of BIAs in the NWMR, refer to Table 8-3 and Figure 8-2 .
Roseate tern	This species is generally tropical in distribution and there are many breeding populations in the NWMR, including Ashmore Reef, Napier Broome Bay, Bonaparte Archipelago, Lacepede Islands, Dampier Archipelago and the Lowendal Islands. A large number of non-breeding roseate terns have been observed at several remote locations in the Kimberley and there are high numbers also recorded for Eighty Mile Beach Ramsar site. The Kimberley colonies are likely to be another sub-species that breeds in east Asia. Roseate terns predominately eat small pelagic fish (Commonwealth of Australia, 2019). The largest breeding colony in Western Australia for this species is in the Houtman Abrolhos Islands, SWMR (Surman, 2019). For the description and location of BIAs in the NWMR, refer to Table 8-3 and Figure 8-2 .
Wedge-tailed shearwater	The wedge-tailed shearwater is a pelagic, marine seabird known from tropical and subtropical waters. Its distribution is widespread across the Indian and Pacific oceans. It is known to breed on the east and west coasts (and offshore islands) of Australia. This species is known to consume fish, cephalopods, and other biota primarily via contact-dipping. Wedge-tailed shearwaters are now understood to undertake extensive foraging trips (over thousands of kilometres over periods of days when chicking and provisioning young) and much longer and extensive pelagic travels over the north-west Indian Ocean during the non-breeding season, targeting current boundaries and upwellings. The species breeds throughout its range, mainly on vegetated islands, atolls and cays and excavates burrows in the ground where chicks are raised (Commonwealth of Australia, 2019). Large breeding colonies of the wedge-tailed shearwater are located on the Houtman Abrolhos islands (SWMR) (Surman <i>et al.</i> , 2018) and several locations in the NWMR including: Muiron Islands (North-west Cape), Varanus Island and the Dampier Archipelago in the Pilbara where burrow numbers were estimated to several hundred thousand to half a million such as on the Muiron Islands, though it is not known if all burrows are utilised on an annual basis (Birdlife Australia, 2018; Surman <i>et al.</i> , 2018). Cannell <i>et al</i> (2019) satellite tracked adult wedge-tailed shearwaters during egg incubation and chick rearing on the Muiron Islands in January 2018. For the incubation trips, there was a strong consistency for the birds to travel towards seamounts, typically located north-west of the Muiron Islands, between Australia and Indonesia. One bird however remained south-west of the islands, in the Cape Range Canyon. A similar pattern to utilise areas associated with sea mounts was also observed for the long foraging trips during chick rearing, though some of the foraging was concentrated in deeper waters. A bimodal foraging strategy during chick-rearing was observed, with adults undertaking long foraging trips after a series of shorter foraging trips within the NWMR. Surman <i>et al.</i> (2018) reported most wedge-tailed shearwaters from the breeding colonies on the Houtman Abrolhos undertook extensive non-breeding migrations. This seabird species occupied waters adjacent or to the north of their nesting sites or migrated 4200 km north-west into the equatorial central Indian Ocean near the Ninety East Ridge during the non-breeding season (later April to mid-November). For the description and location of BIAs in the NWMR, refer to Table 8-3 and Figure 8-1 .
Flesh-footed shearwater	The species mainly occurs in the subtropics, over continental shelves and slopes and occasionally inshore waters, with individual birds pass through the tropics and over deeper waters during migration to the North Pacific and Indian oceans (Commonwealth of Australia, 2019). They are a common visitor to the waters off southern Australia, from south-western WA to south-eastern Queensland. The fleshy-footed shearwater is a trans-equatorial migrant, breeding from late September to May off south-western Australia, and migrating north by early May, across the southern Indian and possibly Indonesia to the northern Pacific Ocean. No BIAs for the flesh-footed shearwater are located in the NWMR.
Streaked shearwater	The streaked shearwater has a broad distribution in the western Pacific Ocean, breeding on the coast and offshore islands of Japan, Russia, China and the Korean Peninsula. During winter months (non-breeding season), the species undertakes trans-equatorial migration to the coasts of Vietnam, New Guinea, the Philippines, Australia, southern India and Sri Lanka. The streaked shearwater feeds mainly on fish and squid that it catches by surface-seizing and shallow plunges (Commonwealth of Australia, 2019). No BIAs for the streaked shearwater are located in the NWMR.
White-tailed tropicbird	Tropicbirds are predominately pelagic species and the white-tailed tropicbird forages in warm waters and over long distances (pan-tropical). The species is most common off north-west Australia. In the NWMR, this species is considered a sub-species and are limited in number and distribution. Nesting sites are known for Clerke Reef (Rowley Shoals) and Ashmore

Species	Key Information
	Reef. Christmas Island is also a known nesting site and the species can disperse several thousand kilometres during foraging trips. This species feeds mainly on fish and cephalopods, captured by deep plunge diving (Commonwealth of Australia, 2019). There are breeding BIAs at the Rowley Shoals and Ashmore Reef within the NWMR for the white-tailed tropicbird; refer to Table 8-3 .
Silver gull	The silver gull is typically described as an inshore and coastal foraging seabird and has an Australian-wide distribution including locations within the NWMR. It is noted as it has been recorded on unmanned oil and gas platforms located within the NWS.

8.2.1 Biologically Important Areas in the NWMR

BIAs representing important life cycle stages and behaviours for eight species of seabird in the NWMR are presented in **Table 8-3**.

Table 8-3 Seabird BIAs within the NWMR

Seabird Species	Woodside Activity Area			BIAS			
	Browse	NWS/S	NWC	Breeding/foraging	Foraging	Breeding	Resting
Australia fairy tern	-	✓	✓	-	No foraging BIAs in the NWMR Foraging in high numbers: the BIA is located in the SWMR including the Houtman Abrolhos Islands	Dampier Archipelago, Montebello, Lowendal and Barrow Island Groups, south Ningaloo and barrier island of Shark Bay	-
Wedge-tailed shearwater	✓	✓	✓	Widespread area of the NWMR offshore and inshore waters	Foraging in high numbers: the BIA is located in the SWMR including the Houtman Abrolhos Islands	-	-
Great frigatebird	✓	-	-	Ashmore Reef, Adele Island	-	-	-
Lesser frigatebird	✓	✓	-	Off Eighty Mile Beach, Lacepedes, Adele Island, North Kimberley and Ashmore Reef	-	-	-
Brown booby	✓	✓	-	Off Eighty Mile Beach, Lacepedes, Adele Island, North Kimberley and Ashmore Reef	-	-	-
Red-footed booby	✓	-	-	Adele Island, Ashmore Reef	-	-	-
Little tern	✓	✓	-	Rowley Shoals, Adele Island	-	-	-
Roseate tern	✓	✓	✓	-	No foraging BIAs in the NWMR Foraging (provisioning young) and foraging BIAs located in the SWMR – Houtman Abrolhos Islands the	Dampier Archipelago, Montebello, Lowendal and Barrow Island Groups, south Ningaloo and barrier island of Shark Bay	Eighty Mile Beach

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Seabird Species	Woodside Activity Area		BIAs				
	Browse	NWS/S	NWC	Breeding/foraging	Foraging	Breeding	Resting
White-tailed tropicbird	✓	-	-		nearest BIA to the NWMR	Rowley Shoals Ashmore Reef	

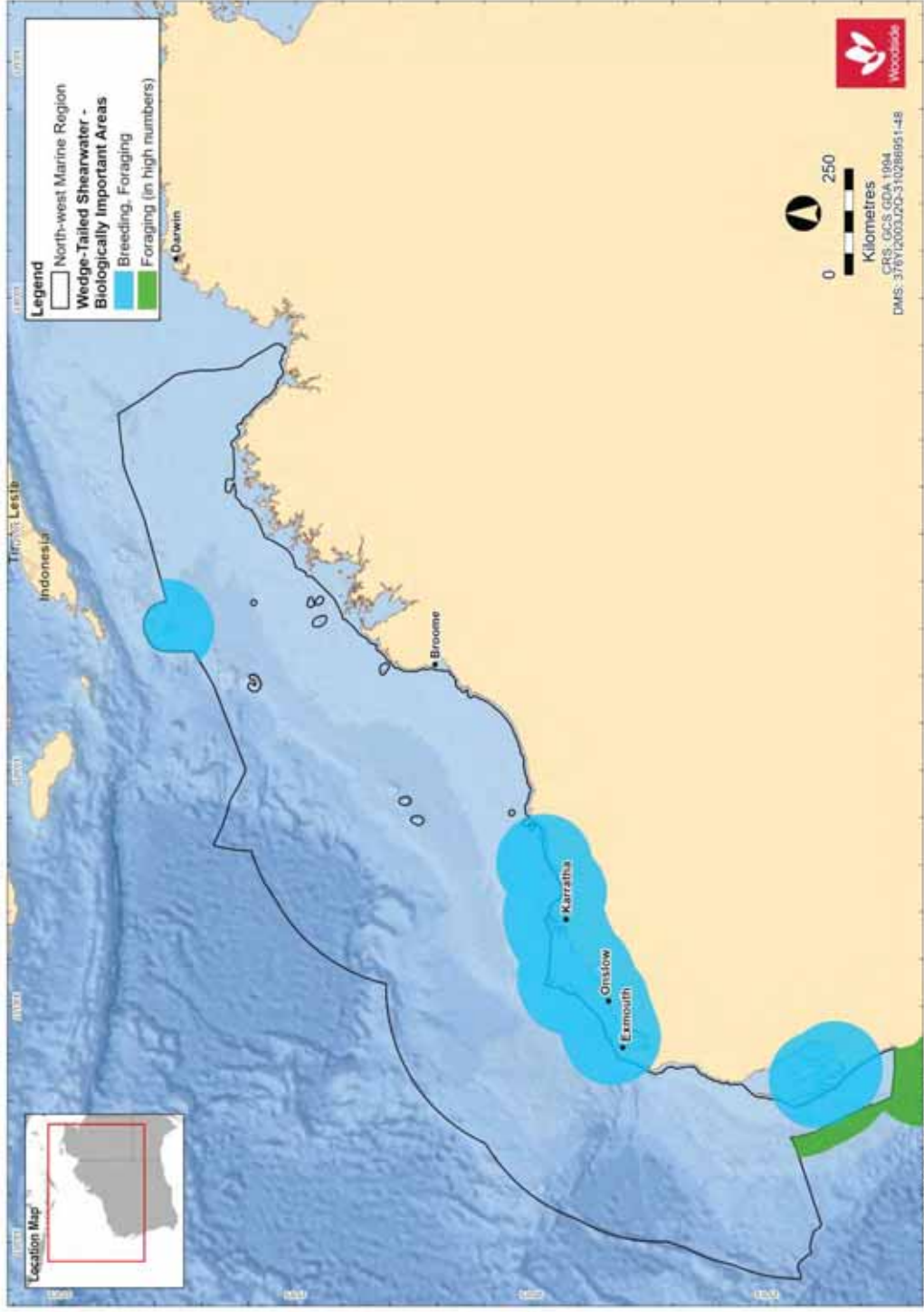


Figure 8-1 Wedge-tailed shearwater BIAs for the NWMR

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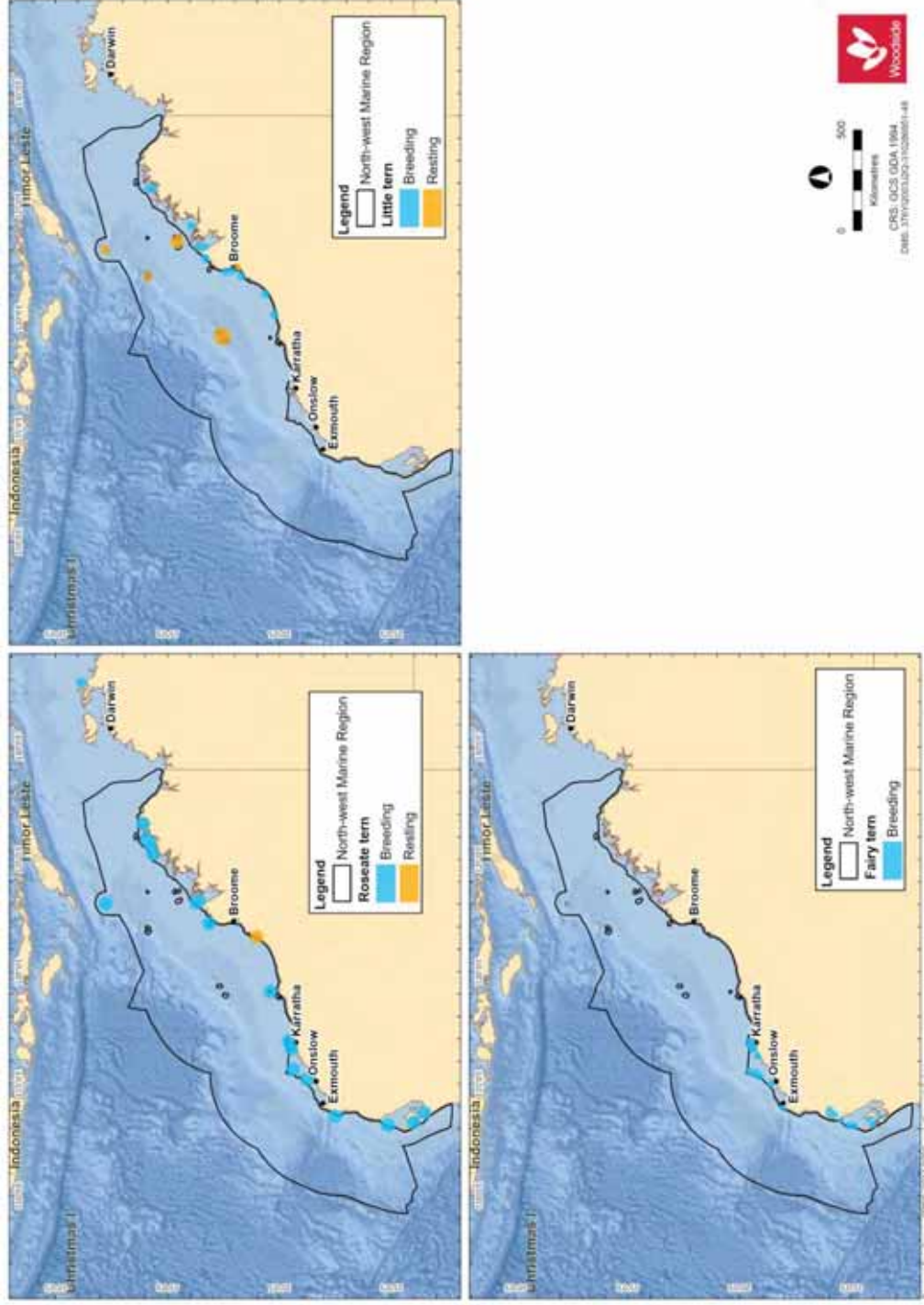


Figure 8-2 Tern species BIAs for the NWMR

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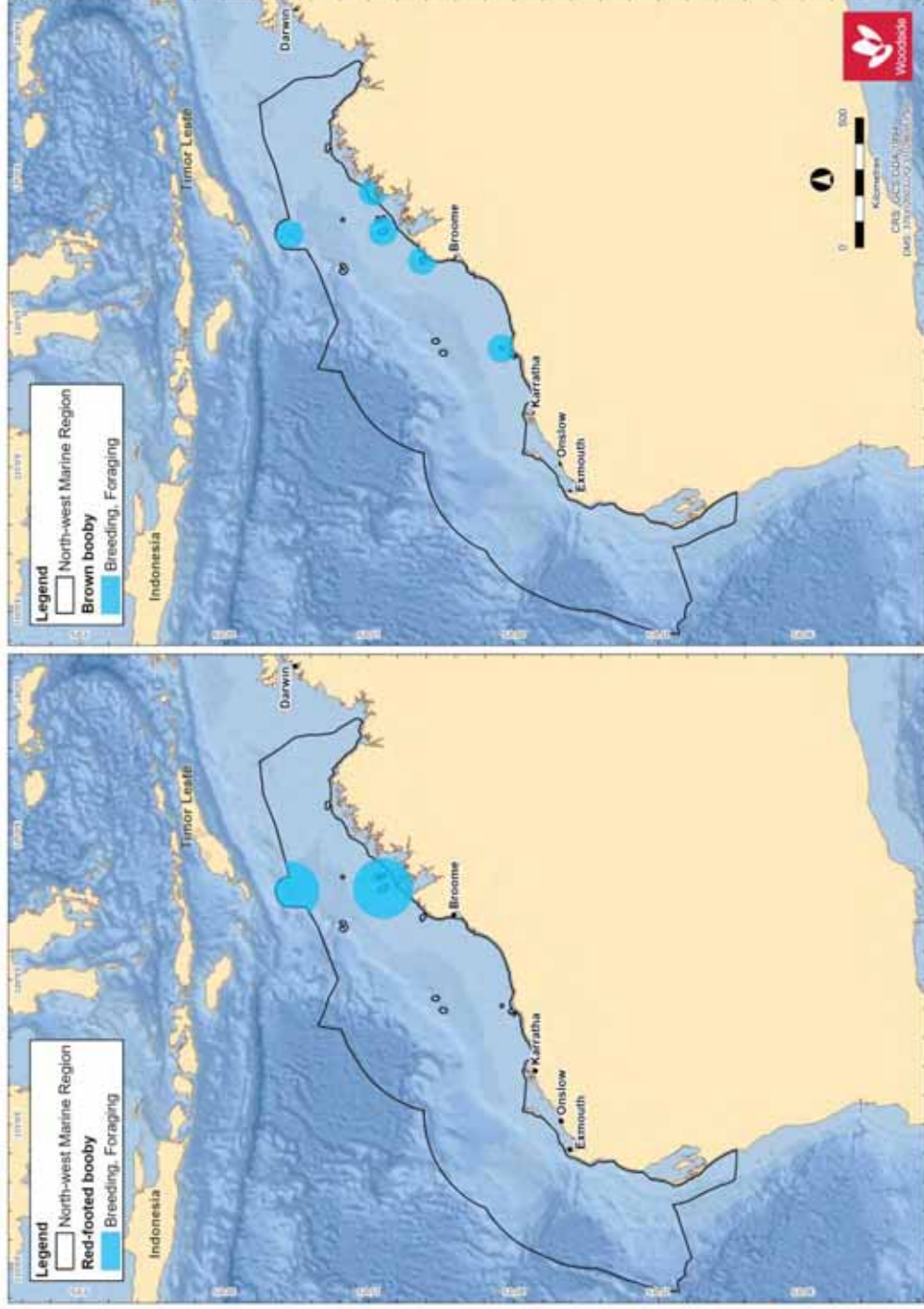


Figure 8-3 Red-footed and brown booby BIAs for the NWMR

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8.2.2 Seabird Summary for NWMR

8.2.2.1 Browse

The Browse activity area includes biologically important habitat for seven threatened and/or migratory seabird species:

- wedge-tailed shearwater (breeding/foraging);
- great and lesser frigatebirds (breeding/foraging);
- brown booby (breeding/foraging);
- red-footed booby (breeding/foraging);
- little tern (breeding/foraging);
- roseate tern (breeding and resting); and,
- white-tailed tropicbird (breeding).

BIAs for the seabird species are outlined in **Table 8-3**.

8.2.2.2 NWS / Scarborough

The NWS / Scarborough activity area includes biologically important habitat for five threatened and/or migratory seabird species:

- wedge-tailed shearwater (breeding/foraging);
- lesser frigatebird (breeding/foraging);
- brown booby (breeding/foraging);
- little tern (breeding/foraging); and
- roseate tern (breeding and resting).

BIAs for the seabird species are outlined in **Table 8-3**.

8.2.2.3 North-west Cape

The North-west Cape activity area includes biologically important habitat for five threatened and/or migratory seabird species:

- Australian fairy tern (breeding);
- wedge-tailed shearwater (breeding/foraging); and
- roseate tern (breeding and resting).

BIAs for the seabird species are outlined in **Table 8-3**.

8.3 Shorebirds

Shorebirds (migratory and resident species) are generally associated with wetland or coastal environments, and the NWMR hosts a large number of many shorebird species, particularly in the Austral summer (refer to **Appendix A** for the EPBC Act PMST reports on listed species of shorebirds). Shorebirds may use coastal environments for feeding, nesting or migratory stopovers. In coastal environments, shorebirds generally feed during low tide on exposed intertidal mud and sand flats, and roost in suitable habitat above the high water mark. Many shorebird species undergo annual migrations, typically breeding at high latitudes of the Northern Hemisphere and migrating south for the non-breeding season and Australia is part of the East Asian-Australasian Flyway (EAAF). The EAAF extends from breeding grounds in the Russian tundra, Mongolia and Alaska

southwards through east and south-east Asia, to non-breeding areas of Indonesia, Papua New Guinea, Australia and New Zealand (Weller and Lee, 2017). The EAAF is of most relevance to the NWMR. There are 37 species of shorebird which annually migrate to Australia via the EAAF and 36 of these species spend the austral summer (non-breeding season) foraging and roosting in coastal and wetland habitats (Commonwealth of Australia, 2015c; Weller and Lee, 2017).

Ashmore Reef is documented as a BIA for migratory shorebirds in the NWMR (DSEWPAC, 2012a).

Table 8-4. Information on threatened/migratory shorebird species of the NWMR

Species	Key Information
Shorebirds	
Eastern curlew, Far eastern curlew	This species is the largest, migratory shorebird in the world, with a long neck, long legs and a very long downcurved bill and is a long-haul flyer. The eastern curlew is a coastal species with a continuous distribution north from Barrow Island to the Kimberley region. The species is endemic to the EAAF and is a non-breeding visitor to Australia from August to March, primarily foraging on crabs and molluscs in intertidal mudflats. During the non-breeding season in Australia, this species is most associated with sheltered coasts, especially estuaries, bays, harbours, inlets and coastal lagoons, with large intertidal mudflats or sandflats, often with beds of seagrass (DOE, 2015a).
Curlew sandpiper	The curlew sandpiper breeds in northern Siberia but has a non-breeding range that extends from western Africa to Australia, with small numbers reaching New Zealand (Bamford <i>et al.</i> , 2008). In Australia, curlew sandpipers occur around the coasts and are also quite widespread inland, though in smaller numbers. Records occur in all states and the NT during the non-breeding period, and also during the breeding season when many non-breeding one-year old birds remain in Australia rather than migrating north along the EAAF. The species preferred habitat for foraging is mudflats and nearby shallow waters in sheltered coastal areas such as estuaries, bay, inlets and lagoons (DOE, 2015b).
Great knot	The great knot breeds in the Northern Hemisphere and undertakes biannual migrations along the EAAF to non-breeding habitat in Australia. The great knot winters in Australia and has been recorded around the entirety of the Australian coast the greatest numbers are found in northern Western Australia (Pilbara (Dampier Archipelago) and Kimberley and the Northern Territory. In Australia, this species prefers sheltered, coastal habitat with large intertidal mudflats or sandflats (including inlets, bays, harbours, estuaries and lagoons). High numbers (exceeding several thousand birds are regularly recorded from Roebuck Bay. The great knot feeds on a variety of invertebrates by pecking at or just below the surface of moist mud or sand (Threatened Species Scientific Committee, 2016a).
Bar-tailed godwit (<i>menzbieri</i>)	The bar-tailed godwit is a large, migratory shorebird and there are two sub-species in the EAAF (<i>Limosa lapponica baueri</i> and <i>L. l. menzbieri</i>). The sub-species <i>L. l. menzbieri</i> breeds in northern Siberia and spends its non-breeding period mostly in the north of WA but also in South-east Asia. The bar-tailed godwit (<i>menzbieri</i>) usually forages near the water in shallow water, mainly in tidal estuaries and harbours with a preference for exposed sandy or soft mud substrates on intertidal flats, banks and beaches (Threatened Species Scientific Committee, 2016c).
Red knot (<i>piersmai</i>)	This species is a small to medium migratory shorebird. There are two sub-species that cannot be distinguished from each other in nonbreeding plumage, however, <i>Calidris canutus piersmai</i> tend to overwinter almost exclusively in north-west Australia. The red knot migrates long distances from breeding grounds in high northern latitudes, where it breeds during the boreal summer, to the Southern Hemisphere during the austral summer with migration along the EAAF. Very large numbers are recorded for the north-west Australia and is common in all suitable habitats around the coast, including inland clay pans near Roebuck Bay (where the species roosts). The red knot usually forages in soft substrate along the waters edge on intertidal mudflats, sandflats and sandy beaches of sheltered coasts (Threatened Species Scientific Committee, 2016b).
Lesser sand plover	The lesser sand plover is a small to medium shorebird and one of 36 migratory shorebirds that breed in the Northern Hemisphere during the boreal summer and are known to annually migrate to the non-breeding grounds of Australia along the EAAF for the austral summer. There are five different sub-species and it is most likely the non-breeding ranges of the sub-species <i>Charadrius m. mongolus</i> overlaps with the NWMR. This species is widespread in coastal regions, preferring sandy beaches, mudflats of coastal bays and estuaries (Threatened Species Scientific Committee, 2016e).
Greater sand plover	The greater sand plover is a small to medium shorebird and in its non-breeding plumage is difficult to distinguish from the lesser sand plover. This species breeds in the Northern

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Species	Key Information
	Hemisphere and undertakes annual migrations to and from Southern Hemisphere feeding grounds in the austral summer along the EAAF. The species distribution in Australia during the non-breeding season is widespread, in WA the greater sand plover is widespread between Northwest Cape and Roebuck Bay (Threatened Species Scientific Committee, 2016d).

9. KEY ECOLOGICAL FEATURES

Key ecological features (KEFs) are elements of the Commonwealth marine environment that are considered to be important for a marine region's biodiversity or ecosystem function and integrity. KEFs have been identified by the Australian Government based on advice from scientists about the ecological processes and characteristics of the area.

KEFs meet one or more of the following criteria:

- a species, group of species, or a community with a regionally important ecological role (e.g. a predator, prey that affects a large biomass or number of other marine species),
- a species, group of species or a community that is nationally or regionally important for biodiversity,
- an area or habitat that is nationally or regionally important for:
 - enhanced or high productivity (such as predictable upwellings – an upwelling occurs when cold nutrient-rich waters from the bottom of the ocean rise to the surface),
 - aggregations of marine life (such as feeding, resting, breeding or nursery areas), or
 - biodiversity and endemism (species which only occur in a specific area),
- a unique seafloor feature, with known or presumed ecological properties of regional significance.

Thirteen KEFs are designated within the NWMR, twelve KEFs within the SWMR and eight KEFs within the NMR. These KEFs have been identified in the Protected Matters search (**Appendix A**) and outlined in **Table 9-1**, **Table 9-2** and **Table 9-3**, and **Figure 9-1**, **Figure 9-2** and **Figure 9-3**.

Table 9-1 Key Ecological Features (KEF) within the NWMR

KEF Name	Woodside Activity Area			Values ¹	Description
	Browse	NWS/S	NW Cape		
Carbonate bank and terrace system of the Sahul Shelf	✓	-	-	<p>Unique seafloor feature with ecological properties of regional significance</p> <p>Regionally important because of their role in enhancing biodiversity and local productivity relative to their surroundings. The carbonate banks and terraces provide areas of hard substrate in an otherwise soft sediment environment which are important for sessile species</p>	<p>The Carbonate banks and terrace system of the Sahul Shelf are located in the western Joseph Bonaparte Gulf and to the north of Cape Bougainville and Cape Londonderry. The carbonate banks and terraces are part of a larger complex of banks and terraces that occurs on the Van Diemen Rise in the adjacent NMR.</p> <p>The bank and terrace system of the Van Diemen Rise covers approximately 31,278 km² and forms part of the larger system associated with the Sahul Banks to the north and Londonderry Rise to the east. The feature is characterised by terrace, banks, channels and valleys (DSEWPAC, 2012c). The banks, ridges and terraces of the Van Diemen Rise are raised geomorphic features with relatively high proportions of hard substrate that support sponge and octocoral gardens. These, in turn, provide habitat to other epifauna, by providing structure in an otherwise flat environment (Przeslawski <i>et al.</i>, 2011). Plains and valleys are characterised by scattered epifauna and infauna that include polychaetes and ascidians. These epibenthic communities support higher order species such as olive ridley turtles, sea snakes and sharks (DSEWPAC, 2012c)</p>
Pinnacles of the Bonaparte Basin	✓	-	-	<p>Unique seafloor feature with ecological properties of regional significance</p> <p>Provide areas of hard substrate in an otherwise soft sediment environment and so are important for sessile species</p> <p>Recognised as a biodiversity hotspot for sponges</p> <p>The Pinnacles of the Bonaparte Basin KEF is located within both the NWMR and NMR (refer Table 9-3)</p>	<p>The Pinnacles of the Bonaparte Basin provide areas of hard substrate in an otherwise relatively featureless environment, the pinnacles are likely to support a high number of species, although a better understanding of the species richness and diversity associated with these structures is required (DSEWPAC, 2012a, 2012c). Covering >520 km² within the Bonaparte Basin, this feature contains the largest concentration of pinnacles along the Australian margin. The Pinnacles of the Bonaparte Basin are thought to be the eroded remnants of underlying strata; it is likely that the vertical walls generate local upwelling of nutrient-rich water, leading to phytoplankton productivity that attracts aggregations of planktivorous and predatory fish, seabirds, and foraging turtles (DSEWPAC, 2012a, 2012c).</p>
Ashmore Reef and Cartier Island and surrounding Commonwealth waters	✓	-	-	<p>High productivity, biodiversity and aggregation of marine life that apply to both the benthic and pelagic habitats within the feature</p>	<p>Ashmore Reef is the largest of only three emergent oceanic reefs present in the north-eastern Indian Ocean and is the only oceanic reef in the region with vegetated islands. Ashmore contains a large reef shelf, two large lagoons, several channelled carbonate sand flats, shifting sand cays, an extensive reef flat, three vegetated islands—East, Middle and West Islands—and</p>

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KEF Name	Woodside Activity Area			Values ¹	Description
	Browse	NWS/S	NW Cape		
Surrounding waters. Rising from a depth of more than 100 m, the reef platform is at the edge of the NWS and covers an area of 239 km ² . Ashmore Reef and Cartier Island and the surrounding Commonwealth waters are regionally important for feeding and breeding aggregations of birds and other marine life; they are areas of enhanced primary productivity in an otherwise low-nutrient environment (DSEWPAC, 2012a). Ashmore Reef supports the highest number of coral species of any reef off the WA coast.					
Seringapatam Reef and the Commonwealth waters in the Scott Reef complex	✓	-	-	Support diverse aggregations of marine life, have high primary productivity relative to other parts of the region, are relatively pristine and have high species richness, which apply to both the benthic and pelagic habitats within the feature	Seringapatam Reef and the Commonwealth waters in the Scott Reef complex are regionally important in supporting the diverse aggregations of marine life, high primary productivity, and high species richness associated with the reefs themselves. As two of the few offshore reefs in the north-west, they provide an important biophysical environment in the region (DSEWPAC, 2012a).
Continental slope demersal fish communities	✓	✓	✓	High biodiversity of demersal fish assemblages, including high levels of endemism	The diversity of demersal fish assemblages on the continental slope in the Timor Province, the Northwest Transition and the North-west Province is high compared to elsewhere along the Australian continental slope (DSEWPAC, 2012a). The continental slope between North-west Cape and the Montebello Trough has more than 500 fish species, 76 of which are endemic, which makes it the most diverse slope bioregion in Australia (Last <i>et al.</i> , 2005). The slope of the Timor Province and the Northwest Transition also contains more than 500 species of demersal fishes of which 64 are considered endemic (Last <i>et al.</i> , 2005), making it the second richest area for demersal fishes throughout the whole continental slope. Demersal fish species occupy two distinct demersal biomes associated with the upper slope (225–500 m water depths) and the mid-slope (750–1000 m). Although poorly known, it is suggested that the demersal slope communities rely on bacteria and detritus-based systems comprised of infauna and epifauna, which in turn become prey for a range of teleost fishes, molluscs and crustaceans (Brewer <i>et al.</i> , 2007). Higher-order consumers may include carnivorous fishes, deepwater sharks, large squid, and toothed whales (Brewer <i>et al.</i> , 2007). Pelagic production is phytoplankton-based, with hot spots around oceanic reefs and islands (Brewer <i>et al.</i> , 2007).

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KEF Name	Woodside Activity Area			Values ¹	Description
	Browse	NWS/S	NW Cape		
Ancient coastline at 125 m depth contour	✓	✓	✓	<p>Unique seafloor feature with ecological properties of regional significance</p> <p>Provides areas of hard substrate and therefore may provide sites for higher diversity and enhanced species richness relative to surrounding areas of predominantly soft sediment</p>	<p>Several steps and terraces as a result of Holocene sea level changes occur in the region, with the most prominent of these features occurring as an escarpment along the NWMR and Sahul Shelf at a water depth of 125 m.</p> <p>The Ancient Coastline is not continuous throughout the NWMR and coincides with a well-documented eustatic stillstand at about 130 m worldwide (Falkner <i>et al.</i>, 2009).</p> <p>Where the Ancient Coastline provides areas of hard substrate, it may contribute to higher diversity and enhanced species richness relative to soft sediment habitat (Falkner <i>et al.</i>, 2009). Parts of the Ancient Coastline, represented as rocky escarpment, are considered to provide biologically important habitat in an area predominantly made up of soft sediment.</p> <p>The escarpment type features may also potentially facilitate mixing within the water column due to upwelling, providing a nutrient-rich environment. Although the Ancient Coastline adds additional habitat types to a representative system, the habitat types are not unique to the coastline as they are widespread on the upper shelf (Falkner <i>et al.</i>, 2009)</p>
Canyons linking the Argo Abyssal Plain and Scott Plateau	-	✓	-	<p>Facilitates nutrient upwelling, creating enhanced productivity and encouraging diverse aggregations of marine life</p>	<p>Interactions with the Leeuwin Current and strong internal tides are thought to result in upwelling at the canyon heads, thus creating conditions for enhanced productivity in the region (Brewer <i>et al.</i>, 2007). As a result, aggregations of whale sharks, manta rays, humpback whales, sea snakes, sharks, predatory fishes and seabirds are known to occur in the area due to its enhanced productivity (Sleeman <i>et al.</i>, 2007).</p>
Glomar Shoal	-	✓	-	<p>An area of high productivity and aggregations of marine life including commercial and recreational fish species</p>	<p>Glomar Shoal is a submerged littoral feature located about 150 km north of Dampier on the Rowley shelf at depths of 33–77 m (Falkner <i>et al.</i>, 2009). Studies by Abdul Wahab <i>et al.</i> (2018) found a number of hard coral and sponge species in water depths less than 40 m. One hundred and seventy (170) different species of fishes were detected with greatest species richness and abundance in shallow habitats (Abdul Wahab <i>et al.</i>, 2018). Fish species present include a number of commercial and recreational species such as Rankin cod, brown striped snapper, red emperor, crimson snapper, bream and yellow-spotted triggerfish (Falkner <i>et al.</i>, 2009; Fletcher and Santoro, 2009). These species have recorded high catch rates associated with Glomar Shoal, indicating that the shoal is likely to be an area of high productivity.</p>

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KEF Name	Woodside Activity Area			Values ¹	Description
	Browse	NWS/S	NW Cape		
Mermaid Reef and Commonwealth waters surrounding Rowley Shoals	-	✓	-	Regionally important in supporting high species richness, higher productivity and aggregations of marine life	<p>The Mermaid Reef and Commonwealth waters surrounding the Rowley Shoals KEF and is adjacent to the three nautical mile State waters limit surrounding Clerke and Imperieuse reefs, and include the Mermaid Reef Marine Park as described in Section 10.</p> <p>The reefs provide a distinctive biophysical environment in the region. They have steep and distinct reef slopes and associated fish communities. In evolutionary terms, the reefs may play a role in supplying coral and fish larvae to reefs further south via the southward flowing Indonesian Throughflow. Both coral communities and fish assemblages differ from similar habitats in eastern Australia (Done <i>et al.</i>, 1994).</p>
Exmouth Plateau	-	✓	✓	Unique seafloor feature with ecological properties of regional significance, which apply to both benthic and pelagic habitats. Likely to be an important area of biodiversity as it provides an extended area offshore for communities adapted to depths of approximately 1000 m	<p>The Exmouth Plateau is a large, mid-slope, continental margin plateau that lies off the northwest coast of Australia. It ranges in depth from about 500 to more than 5000 m and is a major structural element of the Carnarvon Basin (Miyazaki and Stagg, 2013). The large size of the Exmouth Plateau and its expansive surface may modify deep water flow and be associated with the generation of internal tides; both of which may subsequently contribute to the upwelling of deeper, nutrient-rich waters closer to the surface (Brewer <i>et al.</i>, 2007). Satellite observations suggest that productivity is enhanced along the northern and southern boundaries of the plateau (Brewer <i>et al.</i>, 2007).</p> <p>Sediments on the plateau suggest that biological communities include scavengers, benthic filter feeders and epifauna (DSEWPAC, 2012a). Fauna in the pelagic waters above the plateau are likely to include small pelagic species and nekton attracted to seasonal upwellings, as well as larger predators such as billfishes, sharks and dolphins (Brewer <i>et al.</i>, 2007). Protected and migratory species are also known to pass through the region, including whale sharks and cetaceans.</p>
Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula	-	-	✓	Unique seafloor feature with ecological properties of regional significance. The feature is an area of moderately enhanced productivity, attracting aggregations of fish and higher-order consumers such as large predatory	<p>The canyons are associated with upwelling as they channel deep water from the Cuvier Abyssal Plain up onto the slope. This nutrient-rich water interacts with the Leeuwin Current at the canyon heads (DSEWPAC, 2012a). Aggregations of whale sharks, manta rays, sea snakes, sharks, large predatory fish, and seabirds are known to occur in this area.</p>

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KEF Name	Woodside Activity Area			Values ¹	Description
	Browse	NWS/S	NW Cape		
Commonwealth waters adjacent to Ningaloo Reef	-	-	✓	fish, sharks, toothed whales and dolphins Likely to be important due to their historical association with sperm whale aggregations High productivity and diverse aggregations of marine life The Commonwealth waters adjacent to Ningaloo Reef and associated canyons and plateau are interconnected and support the high productivity and species richness of Ningaloo Reef, globally significant as the only extensive coral reef in the world that fringes the west coast of a continent	The Leeuwin and Ningaloo currents interact, leading to areas of enhanced productivity in the Commonwealth waters adjacent to Ningaloo Reef. Aggregations of whale sharks, manta rays, humpback whales, sea snakes, sharks, large predatory fish, and seabirds are known to occur in this area (DSEWPAC, 2012a). The spatial boundary of this KEF, as defined in the NCVA, is provided in Section 10 .
Wallaby Saddle	-	-	✓	High productivity and aggregations of marine life: Representing almost the entire area of this type of geomorphic feature in the NWMR. It is a unique habitat that neither occurs anywhere else nearby (within hundreds of kilometres) nor with as large an area (Falkner <i>et al.</i> 2009)	The Wallaby Saddle may be an area of enhanced productivity. Historical whaling records provide evidence of sperm whale aggregations in the area of the Wallaby Saddle, possibly due to the enhanced productivity of the area and aggregations of baitfish (DSEWPAC, 2012a).

¹. Values description sourced from *Marine bioregional plan for the North-west Marine Region (DSEWPAC, 2012a) and the Department of Agriculture, Water and the Environment (DAWE) SPRAT database*.

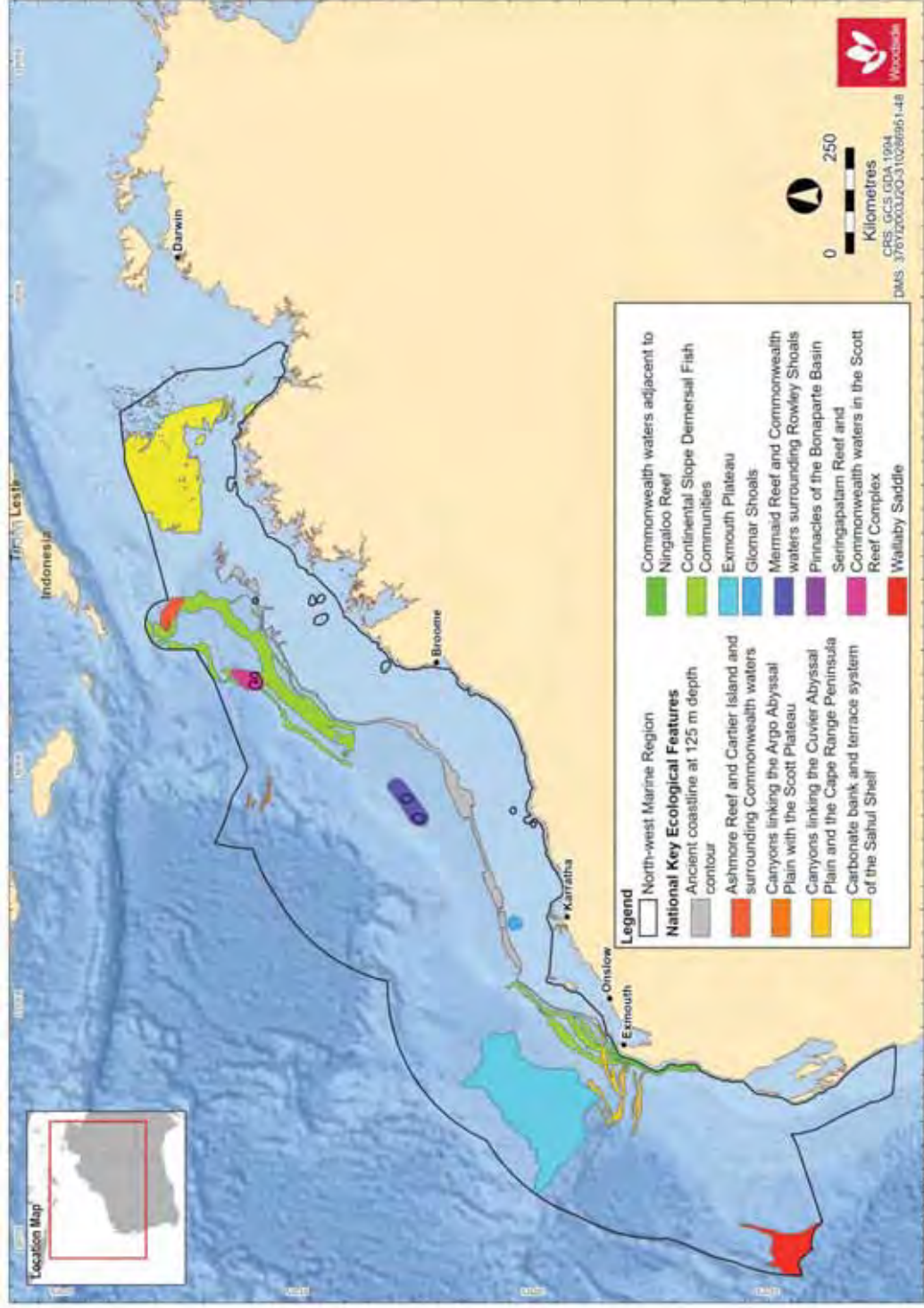


Figure 9-1 Key Ecological Features (KEFs) within the NWMR.

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Table 9-2 Key Ecological Features (KEF) within the SWMR

KEF Name	Values ¹	Description
Albany Canyons group and adjacent shelf break	High productivity and aggregations of marine life, and unique seafloor feature with ecological properties of regional significance Both benthic and demersal habitats within the feature are of conservation value	The Albany Canyons group is thought to be associated with small, periodic subsurface upwelling events, which may drive localised regions of high productivity. The canyons are known to be a feeding area for sperm whale and sites of orange roughy aggregations. Anecdotal evidence also indicates that this area supports fish aggregations that attract large predatory fish and sharks.
Ancient coastline at 90-120 m depth	Relatively high productivity and aggregations of marine life, and high levels of biodiversity and endemism The feature creates topographic complexity, that may facilitate benthic biodiversity and enhanced biological productivity	Benthic biodiversity and productivity occur where the ancient coastline forms a prominent escarpment, such as in the western Great Australian Bight, where the sea floor is dominated by sponge communities of significant biodiversity and structural complexity.
Cape Mentelle upwelling	Facilitates nutrient upwelling, supporting high productivity and diverse aggregations of marine life	The Cape Mentelle upwelling draws relatively nutrient-rich water from the base of the Leeuwin Current, up the continental slope and onto the inner continental shelf, where it results in phytoplankton blooms at the surface. The phytoplankton blooms provide the basis for an extended food chain characterised by feeding aggregations of small pelagic fish, larger predatory fish, seabirds, dolphins and sharks.
Commonwealth marine environment surrounding the Houtman Abrolhos Islands (and adjacent shelf break)	High levels of biodiversity and endemism within benthic and pelagic habitats	The Houtman Abrolhos Islands and surrounding reefs support a unique mix of temperate and tropical species, resulting from the southward transport of species by the Leeuwin Current over thousands of years. The Houtman Abrolhos Islands are the largest seabird breeding station in the eastern Indian Ocean. They support more than one million pairs of breeding seabirds.

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KEF Name	Values ¹	Description
Commonwealth marine environment surrounding the Recherche Archipelago	Aggregations of marine life and high levels of biodiversity and endemism within benthic and demersal communities	The Recherche Archipelago is the most extensive area of reef in the SWMR. Its reef and seagrass habitat supports a high species diversity of warm temperate species, including 263 known species of fish, 347 known species of molluscs, 300 known species of sponges, and 242 known species of macroalgae. The islands also provide haul-out (resting areas) and breeding sites for Australian sea lions and New Zealand fur seals.
Commonwealth marine environment within and adjacent to the west-coast inshore lagoons	High productivity and aggregations of marine life within benthic and pelagic habitats Important for benthic productivity and recruitment for a range of marine species	These lagoons are important for benthic productivity, including macroalgae and seagrass communities, and breeding and nursery aggregations for many temperate and tropical marine species. They are important areas for the recruitment of commercially and recreationally important fish species. Extensive schools of migratory fish visit the area annually, including herring, garfish, tailor and Australian salmon.
Commonwealth marine environment within and adjacent to Geographe Bay	High productivity and aggregations of marine life, and high levels of biodiversity, recruitment within benthic and pelagic communities	Geographe Bay is known for its extensive beds of tropical and temperate seagrass that support a diversity of species, many of them not found anywhere else. The bay provides important nursery habitat for many species. Juvenile dusky whaler sharks use the shallow seagrass habitat as nursery grounds for several years, before ranging out to adult feeding grounds along the shelf break. The seagrass also provides valuable habitat for fish and invertebrates (Carruthers <i>et al.</i> , 2007). It is also an important resting area for migratory humpback whales.
Diamantina Fracture Zone	Unique seafloor feature with ecological properties of regional significance which apply to its benthic and demersal habitats	The Diamantina Fracture Zone is a rugged, deep- water environment of seamounts and numerous closely spaced troughs and ridges. Very little is known about the ecology of this remote, deep- water feature, but marine experts suggest that its size and physical complexity mean that it is likely to support deep-water communities characterised by high species diversity, with many species found nowhere else.
Naturaliste Plateau	Unique seafloor feature with ecological properties of regional significance including high species diversity and endemism which apply to its benthic and demersal habitats	The Naturaliste Plateau is Australia's deepest temperate marginal plateau. The combination of its structural complexity, mixed water dynamics and relative isolation indicate that it supports deep- water communities with high species diversity and endemism.
Perth Canyon and adjacent shelf break, and other west-coast canyons	An area of higher productivity that attracts feeding aggregations of deep-diving mammals and large predatory fish. It is also recognised as a unique seafloor feature with ecological properties of regional significance	The Perth Canyon is the largest known undersea canyon in Australian waters. Deep ocean currents rise to the surface, creating a nutrient-rich cold- water habitat attracting feeding aggregations of deep-diving mammals, such as pygmy blue whales and large predatory fish that feed on aggregations of small fish, krill and squid.

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KEF Name	Values ¹	Description
Western demersal slope and associated fish communities of the Central Western Province	Provides important habitat for demersal fish communities and supports species groups that are nationally or regionally important to biodiversity	The western demersal slope provides important habitat for demersal fish communities, with a high level of diversity and endemism. A diverse assemblage of demersal fish species below a depth of 400 m is dominated by relatively small benthic species such as grenadiers, dogfish and cucumber fish. Unlike other slope fish communities in Australia, many of these species display unique physical adaptations to feed on the sea floor (such as a mouth position adapted to bottom feeding), and many do not appear to migrate vertically in their daily feeding habits.
Western rock lobster	A species that plays a regionally important ecological role	This species is the dominant large benthic invertebrate in the region. The lobster plays an important trophic role in many of the inshore ecosystems of the SWMR. Western rock lobsters are an important part of the food web on the inner shelf, particularly as juveniles.

¹ Values description sourced from *Marine bioregional plan for the South-west Marine Region (DSEWPAC, 2012b)* and the *Department of Agriculture, Water and the Environment (DAWE) SPRAT database*

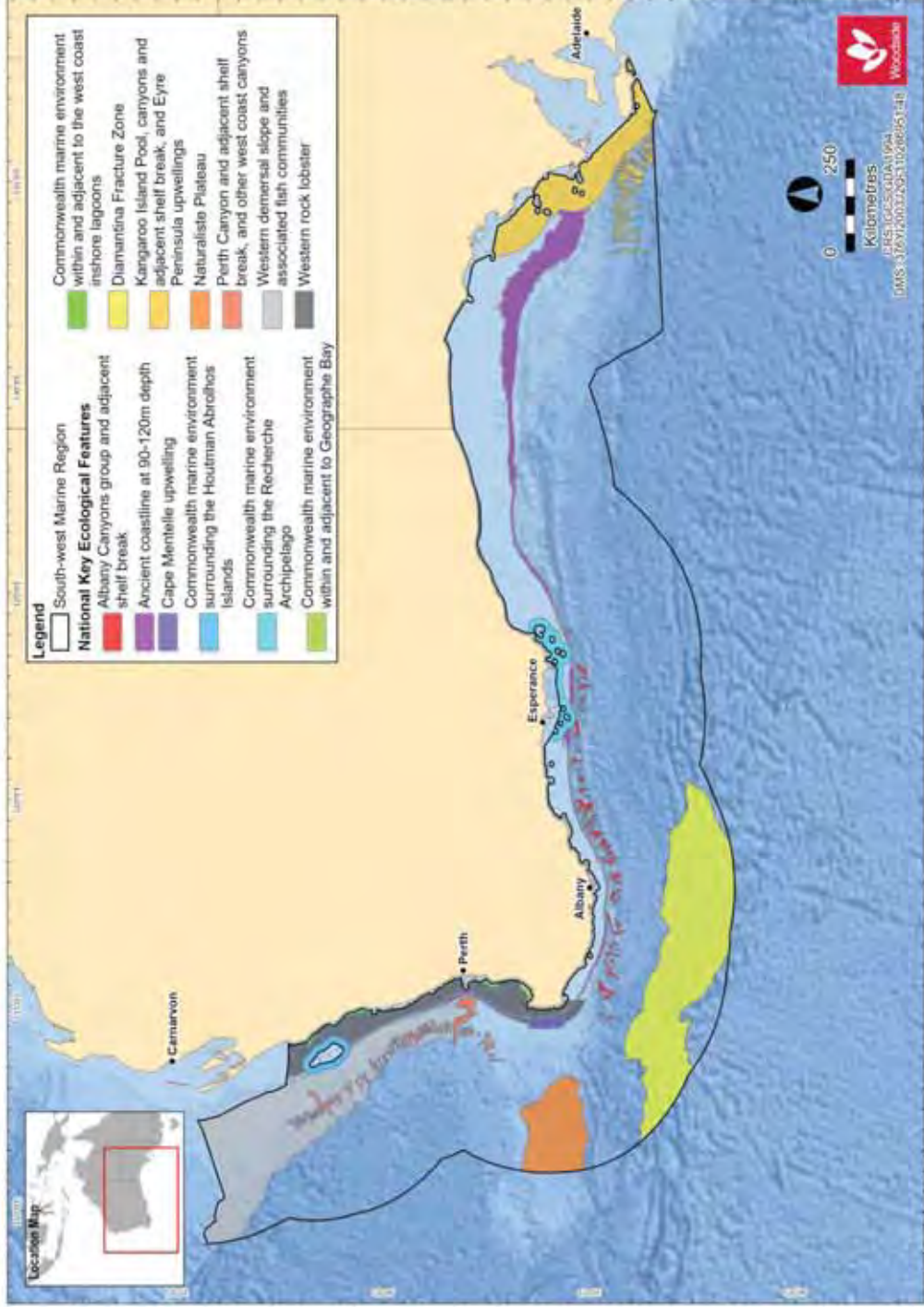


Figure 9-2. Key Ecological Features (KEFs) within the SWMR

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Table 9-3 Key Ecological Features (KEF) within the NMR

KEF Name	Values ¹	Description
Carbonate bank and terrace system of the Van Diemen Rise	<p>Important for its role in enhancing biodiversity and local productivity relative to its surrounds and for supporting relatively high species diversity</p> <p>The feature has been identified as a sponge biodiversity hotspot (Przeslawski <i>et al.</i> 2014)</p>	<p>The bank and terrace system of the Van Diemen Rise is part of the larger system associated with the Sahul Banks to the north and Londonderry Rise to the east; it is characterised by terrace, banks, channels and valleys. The variability in water depth and substrate composition may contribute to the presence of unique ecosystems in the channels. Species present include sponges, soft corals and other sessile filter feeders associated with hard substrate sediments of the deep channels; epifauna and infauna include polychaetes and ascidians. Olive ridley turtles, sea snakes and sharks are also found associated with this feature.</p>
Gulf of Carpentaria basin	<p>Regional importance for biodiversity, endemism and aggregations of marine life relevant to benthic and pelagic habitats</p>	<p>The Gulf of Carpentaria basin is one of the few remaining near-pristine marine environments in the world. Primary productivity in the Gulf of Carpentaria basin is mainly driven by cyanobacteria that fix nitrogen but is also strongly influenced by seasonal processes. The soft sediments of the basin are characterised by moderately abundant and diverse communities of infauna and mobile epifauna dominated by polychaetes, crustaceans, molluscs, and echinoderms. The basin also supports assemblages of pelagic fish species including planktivorous and schooling fish, with top predators such as shark, snapper, tuna, and mackerel.</p>
Gulf of Carpentaria coastal zone	<p>High productivity, aggregations of marine life (including several endemic species) and high biodiversity compared to broader region</p>	<p>Nutrient inflow from rivers adjacent to the NMR generates higher productivity and more diverse and abundant biota within the Gulf of Carpentaria coastal zone than elsewhere in the region. The coastal zone is near pristine and supports many protected species such as marine turtles, dugongs, and sawfishes. Ecosystem processes and connectivity remain intact; river flows are mostly uninterrupted by artificial barriers and healthy, diverse estuarine and coastal ecosystems support many species that move between freshwater and saltwater environments.</p>
Pinnacles of the Bonaparte Basin	<p>Unique seafloor feature with ecological properties of regional significance</p> <p>Provide areas of hard substrate in an otherwise soft sediment environment and so are important for sessile species</p> <p>Recognised as a biodiversity hotspot for sponges</p> <p>The Pinnacles of the Bonaparte Basin KEF is located within both the NWMR and NMR (refer Table 9-1)</p>	<p>Covering more than 520 km² within the Bonaparte Basin, this feature contains the largest concentration of pinnacles along the Australian margin. The Pinnacles of the Bonaparte Basin are thought to be the eroded remnants of underlying strata; it is likely that the vertical walls generate local upwelling of nutrient-rich water, leading to phytoplankton productivity that attracts aggregations of planktivorous and predatory fish, seabirds and foraging turtles.</p>

KEF Name	Values ¹	Description
Plateaux and saddle north-west of the Wellesley Islands	High species abundance, diversity and endemism of marine life	Abundance and species density are high in the plateaux and saddle as a result of increased biological productivity associated with habitats rather than currents. Submerged reefs support corals that are typical of northern Australia, including corals that have bleach-resistant zooxanthellae; and particular reef fish species that are different to those found elsewhere in the Gulf of Carpentaria. Species present include marine turtles and reef fish such as coral trout, cod, mackerel, and shark. Seabirds frequent the plateaux and saddle, most likely due to the presence of predictable food resources for feeding offspring.
Shelf break and slope of the Arafura Shelf	The Shelf break and slope of the Arafura Shelf is defined as a key ecological feature for its ecological significance associated with productivity emanating from the slope It also forms part of a unique biogeographic province (Last <i>et al.</i> , 2005)	The shelf break and slope of the Arafura Shelf is characterised by continental slope and patch reefs and hard substrate pinnacles. The ecosystem processes of the feature are largely unknown in the region; however, the Indonesian Throughflow and surface wind-driven circulation are likely to influence nutrients, pelagic dispersal and species and biological productivity in the region. Biota associated with the feature is largely of Timor–Indonesian Malay affinity.
Submerged coral reefs of the Gulf of Carpentaria	High aggregations of marine life, biodiversity and endemism Twenty per cent of the reefs found in the NMR are situated within this KEF (Harris <i>et al.</i> , 2007)	The submerged coral reefs of the Gulf of Carpentaria are characterised by submerged patch, platform and barrier reefs that form a broken margin around the perimeter of the Gulf of Carpentaria basin, rising from the sea floor at depths of 30–50 m. These reefs provide breeding and aggregation areas for many fish species including mackerel and snapper and offer refuges for sea snakes and apex predators such as sharks. Coral trout species that inhabit the submerged reefs are smaller than those found in the Great Barrier Reef and may prove to be an endemic sub-species.
Tributary Canyons of the Arafura Depression	High productivity and high levels of species diversity and endemism of marine life within the benthic and pelagic habitats of the feature	The tributary canyons are approximately 80–100 m deep and 20 km wide. The largest of the canyons extend some 400 km from Cape Wessel into the Arafura Depression, and are the remnants of a drowned river system that existed during the Pleistocene era. Sediments in this feature are mainly calcium-carbonate rich, although sediment type varies from sandy substrate to soft muddy sediments and hard, rocky substrate. Marine turtles, deep sea sponges, barnacles and stalked crinoids have all been identified in the area.

¹. Values description sourced from *Marine bioregional plan for the North Marine Region (DSEWPAC, 2012c)* and *Department of Agriculture, Water and the Environment (DAWE) SPRAT database*.

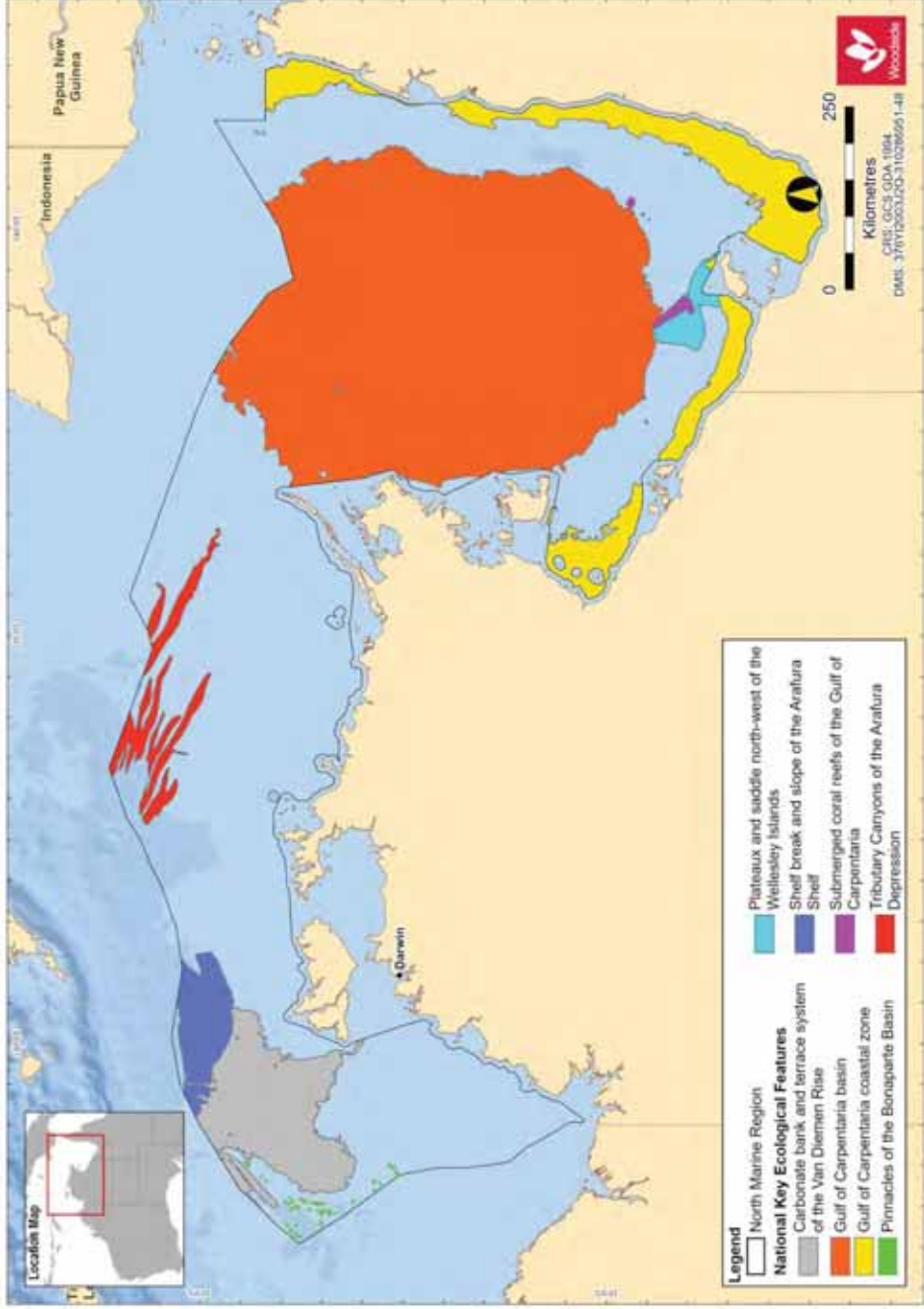


Figure 9-3. Key Ecological Features (KEFs) within the NMR

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10. PROTECTED AREAS

10.1 Regional Context

Protected areas included World Heritage Properties, National Heritage Places, Wetlands of International Importance, Australian Marine Parks, State Marine Parks and Reserves, Threatened Ecological Communities and the Australian Whale Sanctuary. The PMST Reports (**Appendix A**) shows that there are twenty-nine protected areas found in the NWMR, eighteen in the SWMR and nine in the NMR.

Table 10-1, **Table 10-2** and **Table 10-3** outline the protected areas of each of the marine regions NWMR, SWMR and NMR, respectively.

10.2 World Heritage Properties

Properties nominated for World Heritage listing are inscribed on the list only after they have been carefully assessed as representing the best examples of the world's cultural and natural heritage. Only World Heritage listings classed as natural are discussed in this section. World Heritage sites classed as cultural are discussed in **Section 11**.

The list of Australia's World Heritage Properties and the PMST Reports (**Appendix A**) show two World Heritage Properties within the NWMR (**Table 10-1**), no World Heritage Properties within the SWMR (**Table 10-2**), and though not reported in the NMR PMST Report, Kakadu National Park and World Heritage Area is included in **Table 10-3**.

10.3 National and Commonwealth Heritage Places - Natural

The National Heritage List is Australia's list of natural, historic, and Indigenous places of outstanding significance to the nation. The National Heritage List Spatial Database describes the place name, class (Indigenous, natural, historic), and status. Commonwealth Heritage Places are a collection of sites recognised for their Indigenous, historical and/or natural values which are owned or controlled by the Australian Government.

Only National and Commonwealth Heritage Places classed as natural are discussed in this section. Heritage Places classed as indigenous or historic are discussed in **Section 11**.

A search of the National Heritage List Spatial Database and the PMST Reports (**Appendix A**) identified three natural National Heritage Places in the NWMR (**Table 10-1**), three in the SWMR (**Table 10-2**) and for the NMR, Kakadu National Park (not included in the PMST report) is included in **Table 10-3**.

A search of the Commonwealth Heritage List identified four natural commonwealth heritage places within the NWMR (**Table 10-1**).

10.4 Wetlands of International Importance (listed under the Ramsar Convention)

Australia has 65 Ramsar wetlands that cover >8.3 million ha. Ramsar wetlands are those that are representative, rare, or unique wetlands, or that are important for conserving biological diversity.

The List of Wetlands of International Importance held under the Ramsar Convention and the PMST Reports (**Appendix A**) identified four Ramsar Sites with coastal features within the NWMR (**Table 10-1**), four in the SWMR (**Table 10-2**) and two for the New Territory, included for the NMR (**Table 10-3**).

10.5 Australian Marine Parks

Australian Marine Parks (AMPs), proclaimed under the EPBC Act in 2007 and 2013, are located in Commonwealth waters that start at the outer edge of State and Territory waters, generally three

nautical miles (~5.5 km) from the shore, and extend to the outer boundary of Australia's EEZ, 200 nm (~370 km) from the shore.

PMST Reports (**Appendix A**) show sixteen AMPs within the NWMR (**Table 10-1**), ten within the SWMR (**Table 10-2**) and eight within the NMR (**Table 10-3**).

10.6 Threatened Ecological Communities

No Threatened Ecological Communities (TECs) as listed under the EPBC Act are known to occur within the marine waters of the NWMR, SWMR or NMR as indicated by the PMST Reports (**Appendix A**).

10.7 Australian Whale Sanctuary

The Australian Whale Sanctuary has been established to protect all whales and dolphins found in Australian waters. Under the EPBC Act all cetaceans (whales, dolphins and porpoises) are protected in Australian waters.

The Australian Whale Sanctuary includes all Commonwealth waters from the three nautical mile State/Territory waters limit out to the boundary of the EEZ (i.e. out to 200 nm and further in some places). Within the Sanctuary it is an offence to kill, injure or interfere with a cetacean. Severe penalties apply to anyone convicted of such offences.

10.8 State Marine Parks and Reserves

State Marine Parks and Reserves, proclaimed under the *Conservation and Land Management Act 1984* (CALM Act), are located in State waters and vested in the WA Conservation and Parks Commission. State Marine Parks and Reserves of Western Australia have been considered, with 14 occurring in the NWMR (**Table 10-1**) and six occurring in the SWMR (**Table 10-2**).

10.9 Summary of Protected Areas within the NWMR

Table 10-1 Protected Areas within the NWMR

Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park or Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
World Heritage Properties						
Shark Bay World Heritage Property	-	-	✓		The Shark Bay World Heritage Property is adjacent to the Shark Bay AMP and was included on the World Heritage List in 1991.	Universal values of the Shark Bay World Heritage Property include large and diverse seagrass beds, stromatolites and populations of dugong and threatened species. Inscribed under Natural Criteria vii, viii, ix and x.
The Ningaloo Coast World Heritage Property	-	-	✓		The Ningaloo Coast World Heritage Property lies within the Ningaloo AMP and was included on the World Heritage List in 2011.	Universal values of the Ningaloo Coast World Heritage Property include high marine species diversity and abundance; in particular, Ningaloo Reef supports both tropical and temperate marine reptiles and mammals. Inscribed under Natural Criteria vii and x.
National Heritage Places - Natural						
Shark Bay	-	-	✓		The Shark Bay National Heritage Place consists of the same area included in the Shark Bay World Heritage Property (refer above) and was established on the National Heritage List in 2007.	The national heritage place has a number of exceptional natural features, including one of the largest and most diverse seagrass beds in the world, colonies of stromatolites and rich marine life including a large population of dugongs, and also provides a refuge for a number of other globally threatened species. Shark Bay meets the national heritage listing criteria a, b, c, d, e, f, g, h and i.
The Ningaloo Coast	-	-	✓		The Ningaloo Coast National Heritage Place consists of the same area included in the Ningaloo	The Ningaloo Coast contains one of the best developed near-shore reefs in the world, being home to rugged limestone peninsulas, spectacular coral and sponge gardens and the whale shark.

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
The West Kimberley	✓	✓	-		Coast World Heritage Property (refer above) and was established on the National Heritage List in 2010. The West Kimberley National Heritage Place covers an area of around 192,000 km ² located in the north-west of Australia from Broome to Wyndham, and was established on the National Heritage List in 2011.	The Ningaloo Coast meets the national heritage listing criteria a, b, c, d, and f. The Kimberley plateau, north-western coastline and northern rivers of the West Kimberley provide a vital refuge for many native plants and animals that are found nowhere else or which have disappeared from much of the rest of Australia. In addition, Roebuck Bay is internationally recognised as one of Australia's most significant sites for migratory wading birds. The national heritage place also contains a remarkable history of Aboriginal occupation, with many places of indigenous sacred value. The West Kimberley meets the national heritage listing criteria a, b, c, d, e, f, g, h and i.
Commonwealth Heritage Places - Natural						
Mermaid Reef – Rowley Shoals	-	✓	-	N/A	The Mermaid Reef – Rowley Shoals Commonwealth Heritage Place is located within the boundary of the Mermaid Reef Marine National Nature Reserve. The site was listed as a Commonwealth Heritage Place in 2004.	The Mermaid Reef-Rowley Shoals Commonwealth Heritage Place is regionally important for the diversity of its fauna and together with Clerke and Imperieuse reefs, has biogeographical significance due to the presence of species which are at, or close to, the limits of their geographic ranges, including fishes known previously only from Indonesian waters. Rowley Shoals is important for benchmark studies as one of the few places off the north-west coast of Western Australia which have been the site of major biological collection trips by the WA Museum.

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Ashmore Reef National Nature Reserve	✓	-	-		The Ashmore Reef Commonwealth Heritage Place is located within the boundary of the Ashmore Reef Marine Park (refer AMPs below). The site was listed as a Commonwealth Heritage Place in 2004.	Ashmore Reef has major significance as a staging point for wading birds migrating between Australia and the Northern Hemisphere and supports high concentrations of breeding seabirds, many of which are nomadic and typically breed on small isolated islands. Ashmore Reef is an important scientific reference area for migratory seabirds, sea snakes and marine invertebrates. The Ashmore Reef Commonwealth Heritage Place is significant for its history of human occupation and use. The island is believed to have been visited by Indonesian fisherman since the early eighteenth century. The islands were used both for fishing and as a staging point for voyages to the southern reefs off Australia's coast.
Scott Reef and Surrounds – Commonwealth Area	✓	-	-		Scott Reef and Surrounds Commonwealth Heritage Place is located within the Western Australian Coastal Waters surrounding North and South Scott Reef. The site was listed as a Commonwealth Heritage Place in 2004.	The Scott Reef and Surrounds Commonwealth Heritage Place is regionally important for the diversity of its fauna and has biogeographical significance due to the presence of species which are at, or close to, the limits of their geographic ranges, including fish known previously only from Indonesian waters. Scott Reef is recognised as important for scientific research and benchmark studies due to its age, the extensive documentation of its geophysical and physical environmental characteristics and its use as a site of major biological collection trips and surveys by the WA Museum and the Australian Institute of Marine Science.

Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Ningaloo Marine Area – Commonwealth Waters	-	-	✓		The Ningaloo Marine Area Commonwealth Heritage Place is located within the Commonwealth waters of the Ningaloo Marine Park (refer AMPs below). The site was listed as a Commonwealth Heritage Place in 2004.	The Ningaloo Marine Area Commonwealth Heritage Place provides a migratory pathway for humpback whales and foraging habitat for whale sharks. The place is an important breeding area for billfish and manta ray. The Ningaloo Marine Area provides opportunities for scientific research relating to aspects of the area's unique features including tourism (marine ecology, whales, turtles, whale sharks, fish and oceanography).
Wetlands of International Importance (Ramsar)						
Ashmore Reef National Nature Reserve	✓	-	-	Ramsar	The Ashmore Reef Ramsar site is located within the boundary of the Ashmore Reef Marine Park (refer AMPs below). The site was listed under the Ramsar Convention in 2002.	Ashmore Reef Ramsar site supports internationally significant populations of seabirds and shorebirds, is important for turtles (green, hawksbill and loggerhead) and dugong, and has the highest diversity of hermatypic (reef-building) corals on the WA coast. It is known for its abundance and diversity of sea snakes. However, since 1998 populations of sea snakes at Ashmore Reef have been in decline.
Eighty Mile Beach	-	✓	-	Ramsar	The Eighty Mile Beach Ramsar site covers an area of 1250 km ² , located along a long section of the Western Australian coastline adjacent to the Eighty Mile Beach AMP (refer below).	The Eighty Mile Beach Ramsar site includes saltmarsh and a raised peat bog more than 7000 years old. The site contains the most important wetland for waders in north-western Australia, supporting up to 336,000 birds, and is especially important as a land fall for waders migrating south for the austral summer.
Roebuck Bay	-	✓	-	Ramsar	The Roebuck Bay Ramsar site covers an area of 550	The Roebuck Bay Ramsar site is recognised as one of the most important areas for migratory shorebirds in Australia.

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Ord River Floodplain	✓			Ramsar	<p>km², located south of Broome and adjacent to the Roeback AMP (refer below).</p> <p>The Ord River Floodplain Ramsar Site is in the East Kimberley region and encompasses an extensive system of river, seasonal creek, tidal mudflat, and floodplain wetlands. The Ramsar Site is a nursery, feeding and/or breeding ground for migratory birds, waterbirds, fish, crabs, prawns, and crocodiles.</p>	<p>The site regularly supports over 100,000 waterbirds, with numbers being highest in the austral spring when migrant species breeding in the Palearctic stop to feed during migration.</p> <p>The site represents the best example of wetlands associated with the floodplain and estuary of a tropical river system in the Tanami-Timor Sea Coast Bioregion in the Kimberley.</p> <p>In addition, the False Mouths of the Ord are the most extensive mudflat and tidal waterway complex in Western Australia.</p>
Wetlands of National Importance (DAWE, 2019)						
Ashmore Reef	✓	-	-		<p>Ashmore Reef is a shelf-edge platform reef located among the Sahul Banks of north-western Australia. It covers an area of 583 km² and consists of three islets surrounded by intertidal reef and sand flats.</p>	<p>These islets are major seabird nesting sites with 20 breeding species recorded to date. The total bird population has been estimated to exceed 100,000 during the peak breeding season.</p> <p>The marine reserve also has the highest diversity of marine fauna of the reefs on the NWS and differs from other reefs and coastal areas in the region.</p> <p>The area meets criteria 1, 3, 4 and 5 for inclusion on the Directory of Important Wetlands in Australia.</p>
Mermaid Reef	-	✓	-		<p>Mermaid Reef Marine Park covers an area of around 540 km², located ~280 km west north-west of Broome, and is the most north-easterly atoll of the Rowley Shoals.</p>	<p>The reefs of the Mermaid Reef Marine Park have biogeographic value due to the presence of species that are at or close to the limit of their distribution. The coral communities are one of the special values of Mermaid Reef.</p> <p>The area meets criteria 1, 2 and 3 for inclusion on the Directory of Important Wetlands in Australia.</p>

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Exmouth Gulf East	-	-	✓		Exmouth Gulf East covers an area of 800 km ² and includes wetlands in the eastern part of Exmouth Gulf, from Giralalia Bay, to Urala Creek, Locker Point.	The Exmouth Gulf East is an outstanding example of tidal wetland systems of low coast of north-west Australia, with well-developed tidal creeks, extensive mangrove swamps and broad saline coastal flats. The site is one of the major population centres for dugong in WA and its seagrass beds and extensive mangroves provide nursery and feeding areas for marine fishes and crustaceans in the Gulf. The area meets criteria 1, 2 and 3 for inclusion on the Directory of Important Wetlands in Australia.
Hamelin Pool	-	-	✓		Hamelin Pool covers an area of 900 km ² in the far south-east part of Shark Bay.	Hamelin Pool is an outstanding example of a hypersaline marine embayment and supports extensive microbialite (subtidal stromatolite) formations, which are the most abundant and diverse examples of growing marine microbialites in the world. The area meets criteria 1 and 6 for inclusion on the Directory of Important Wetlands in Australia.
Shark Bay East	-	-	✓		Shark Bay East covers a 250 km area of coastline comprising tidal wetlands, and marine waters less than 6 m deep at low tide, in the east arm of Shark Bay.	The site is an outstanding example of a very large, shallow marine embayment, with particularly extensive occurrence of seagrass beds and substantial areas of intertidal mud/sandflats and mangrove swamp. The site supports what is probably the world's largest discrete population of dugong; it is also a major nursery and/or feeding area for turtles, rays, sharks, other fishes, prawns and other marine fauna; and is a major migration stop-over area for shorebirds. The area meets criteria 1, 2, 3, 4, 5 and 6 for inclusion on the Directory of Important Wetlands in Australia.
Australian Marine Parks (DNP, 2018a)						
Abrolhos Marine Park	-	-	✓	II, IV, VI	Abrolhos Marine Park is located adjacent to the WA Houtman Abrolhos Islands, covering a large offshore	Abrolhos Marine Park is significant because it contains habitats, species and ecological communities associated with four bioregions:

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
					area of 88,060 km ² extending from the WA State waters boundary to the edge of Australia's EEZ. The Abrohlos Marine Park is located within both the NWMR and SWMR.	<ul style="list-style-type: none"> Central Western Province Central Western Shelf Province Central Western Transition South-west Shelf Transition It includes seven KEFs: Commonwealth marine environment surrounding the Houtman Abrohlos Islands; Demersal slope and associated fish communities of the Central Western Province; Mesoscale eddies; Perth Canyon and adjacent shelf break, and other west-coast canyons; Western rock lobster; Ancient coastline at 90-120 m depth; and Wallaby Saddle. The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging and breeding habitat for seabirds, foraging habitat for Australian sea lions and white sharks, and a migratory pathway for humpback and pygmy blue whales. The AMP is adjacent to the northernmost Australian sea lion breeding colony in Australia on the Houtman Abrohlos Islands.
Carnarvon Canyon Marine Park	-	-	✓	IV	Carnarvon Canyon Marine Park covers an area of 6177 km ² , located ~300 km north-west of Carnarvon.	Carnarvon Canyon Marine Park is significant because it contains habitats, species and ecological communities associated with the Central Western Transition bioregion. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. There is limited information about species' use of this AMP.
Shark Bay Marine Park	-	-	✓	VI	Shark Bay Marine Park covers an area of 7443 km ² located ~60 km offshore of Carnarvon, adjacent to the Shark Bay World Heritage Property and National Heritage Place.	Shark Bay Marine Park is significant because it contains habitats, species and ecological communities associated with two bioregions: <ul style="list-style-type: none"> Central Western Shelf Province Central Western Transition. The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Gascoyne Marine Park	-	-	✓	II, IV, VI	Gascoyne Marine Park covers an area of 81,766 km ² , located ~20 km off the west coast of the Cape Range Peninsula, adjacent to the Ningaloo Marine Park.	<p>the EPBC Act. BIAs within the AMP include breeding habitat for seabirds, interesting habitat for marine turtles, and a migratory pathway for humpback whales.</p> <p>Gascoyne Marine Park is significant because it contains habitats, species and ecological communities associated with three bioregions:</p> <ul style="list-style-type: none"> • Central Western Shelf Transition • Central Western Transition • Northwest Province. <p>It includes four KEFs: Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula; Commonwealth waters adjacent to Ningaloo Reef; Continental slope demersal fish communities; and Exmouth Plateau.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding habitat for seabirds, interesting habitat for marine turtles, a migratory pathway for humpback whales, and foraging habitat and migratory pathway for pygmy blue whales.</p>
Ningaloo Marine Park	-	-	✓	II, IV	Ningaloo Marine Park covers an area of 2435 km ² , stretching ~300 km along the west coast of the Cape Range Peninsula, and is adjacent to the WA Ningaloo Marine Park and Gascoyne Marine Park.	<p>Ningaloo Marine Park is significant because it contains habitats, species and ecological communities associated with four bioregions:</p> <ul style="list-style-type: none"> • Central Western Shelf Transition • Central Western Transition • Northwest Province • Northwest Shelf Province. <p>It includes three KEFs: Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula; Commonwealth waters adjacent to Ningaloo Reef; and Continental slope demersal fish communities.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and</p>

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Montebello Marine Park	-	✓	-	VI	Montebello Marine Park covers an area of 3413 km ² , located offshore of Barrow Island and 80 km west of Dampier extending from the WA State waters boundary, and is adjacent to the WA Barrow Island and Montebello Islands Marine Parks.	or foraging habitat for seabirds, interesting habitat for marine turtles, a migratory pathway for humpback whales, foraging habitat and migratory pathway for pygmy blue whales, breeding, calving, foraging and nursing habitat for dugong and foraging habitat for whale sharks. Montebello Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Shelf Province bioregion. It includes one KEF: Ancient coastline at 125 m depth contour. The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding habitat for seabirds, interesting, foraging, mating, and nesting habitat for marine turtles, a migratory pathway for humpback whales and foraging habitat for whale sharks.
Dampier Marine Park	-	✓	-	II, IV, VI	Dampier Marine Park covers an area of 1252 km ² , located ~10 km north-east of Cape Lambert and 40 km from Dampier extending from the WA State waters boundary.	Dampier Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Shelf Province bioregion. The AMP provides protection for offshore shelf habitats adjacent to the Dampier Archipelago, and the area between Dampier and Port Hedland, and is a hotspot for sponge biodiversity. The AMP supports a range of species including those listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and foraging habitat for seabirds, interesting habitat for marine turtles and a migratory pathway for humpback whales.
Eighty Mile Beach Marine Park	-	✓	-	VI	Eighty Mile Beach Marine Park covers an area of 10,785 km ² , located ~74 km north-east of Port Hedland, adjacent to the	Eighty Mile Beach Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Shelf Province and consists of shallow shelf habitats, including terrace, banks and shoals.

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	Browse	NWS/S	NW Cape			
Argo – Rowley Terrace Marine Park	✓	✓	-	II, VI, VI (Trawl)	<p>WA Eighty Mile Beach Marine Park.</p> <p>Argo-Rowley Terrace Marine Park covers an area of 146,003 km², located ~270 km north-west of Broome, and extends to the limit of Australia's EEZ. The AMP is adjacent to the Mermaid Reef Marine Park and the WA Rowley Shoals Marine Park.</p>	<p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding, foraging and resting habitat for seabirds, internesting and nesting habitat for marine turtles, foraging, nursing and pupping habitat for sawfishes and a migratory pathway for humpback whales.</p> <p>Argo-Rowley Marine Park is significant because it contains habitats, species and ecological communities associated with two bioregions:</p> <ul style="list-style-type: none"> • Northwest Transition • Timor Province. <p>It includes two KEFs: Canyons linking the Argo Abyssal Plain with the Scott Plateau; and Mermaid Reef and Commonwealth waters surrounding Rowley Shoals.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include resting and breeding habitat for seabirds and a migratory pathway for the pygmy blue whale.</p>
Mermaid Reef Marine Park	-	✓	-	II	<p>Mermaid Reef Marine Park covers an area of 540 km², located ~280 km north-west of Broome, adjacent to the Argo-Rowley Terrace Marine Park and ~13 km from the WA Rowley Shoals Marine Park.</p> <p>Mermaid Reef is one of three reefs forming the Rowley Shoals. The other two are Clerke Reef and Imperieuse Reef, to the</p>	<p>Mermaid Reef Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Transition. It includes one KEF: Mermaid Reef and Commonwealth waters surrounding Rowley Shoals.</p> <p>The Rowley Shoals have been described as the best geological examples of shelf atolls in Australian waters.</p> <p>The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding habitat for seabirds and a migratory pathway for the pygmy blue whale.</p>

Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Roebuck Marine Park	-	✓	-	VI	south-west of the AMP, which are included in the WA Rowley Shoals Marine Park. Roebuck Marine Park covers an area of 304 km ² , located ~12 km offshore of Broome, and is adjacent to the WA Yawuru Nagulagun/Roebuck Bay Marine Park.	Roebuck Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Shelf Province and consists entirely of shallow continental shelf habitat. The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and resting habitat for seabirds, foraging and intermingling habitat for marine turtles, a migratory pathway for humpback whales and foraging habitat for dugong.
Kimberley Marine Park	✓	✓	-	II, IV, VI	Kimberley Marine Park covers an area of 74,469 km ² , located ~100 km north of Broome, extending from the WA State waters boundary north from the Lacepede Islands to the Holothuria Banks offshore from Cape Bougainville.	Kimberley Marine Park is significant because it includes habitats, species and ecological communities associated with three bioregions: <ul style="list-style-type: none"> • Northwest Shelf Province • Northwest Shelf Transition • Timor Province. It includes two KEFs: Ancient coastline at 125 m depth contour; and Continental slope demersal fish communities. The AMP supports a range of species, including protected species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and foraging habitat for seabirds, intermingling and nesting habitat for marine turtles, breeding, calving and foraging habitat for inshore dolphins, calving, migratory pathway and nursing habitat for humpback whales, migratory pathway for pygmy blue whales, foraging habitat for dugong and foraging habitat for whale sharks.
Ashmore Reef Marine Park	✓	-	-	Ia, IV	Ashmore Reef Marine Park covers an area of 583 km ² , located ~630 km north of	Ashmore Reef Marine Park is significant because it includes habitats, species and ecological communities associated with the Timor Province. It includes two KEFs:

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	Browse	NWS/S	NW Cape			
					Broome and 110 km south of the Indonesian island of Roti. The AMP is located in Australia's External Territory of Ashmore and Cartier Islands and is within an area subject to a Memorandum of Understanding (MoU) between Indonesia and Australia, known as the MoU Box.	Ashmore Reef and Cartier Island and surrounding Commonwealth waters; and Continental slope demersal fish communities. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding, foraging and resting habitat for seabirds, resting and foraging habitat for migratory shorebirds, foraging, mating, nesting and interbreeding habitat for marine turtles, foraging habitat for dugong, and a migratory pathway for pygmy blue whales.
Cartier Island Marine Park	✓	-	-	Ia	Cartier Island Marine Park covers an area of 172 km ² , located ~45 km south-east of Ashmore Reef Marine Park and 610 km north of Broome. It is also located in Australia's External Territory of Ashmore and Cartier Islands and within an area subject to an MoU between Indonesia and Australia, known as the MoU Box.	Cartier Island Marine Park is significant because it includes habitats, species and ecological communities associated with the Timor Province. It includes two key ecological features: Ashmore Reef and Cartier Island and surrounding Commonwealth waters and continental slope demersal fish communities. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and foraging habitat for seabirds, interbreeding, nesting and foraging habitat for marine turtles and foraging habitat for whale sharks. The AMP is also internationally significant for its abundance and diversity of sea snakes, some of which are listed species under the EPBC Act.
Joseph Bonaparte Gulf Marine Park	✓	-	-	VI	Joseph Bonaparte Gulf Marine Park covers an area of 8597 km ² and is located ~15 km west of Wadeye, NT, and ~90 km north of Wyndham, WA, in the Joseph Bonaparte Gulf.	Joseph Bonaparte Gulf Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Shelf Transition bioregion. It includes one KEF: Carbonate bank and terrace system of the Sahul Shelf. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
					It is adjacent to the WA North Kimberley Marine Park. The Joseph Bonaparte Gulf Marine Park is located within both the NWMR and NMR.	the EPBC Act. BIAs within the AMP include foraging habitat for marine turtles and the Australian snubfin dolphin.
Oceanic Shoals Marine Park	✓	-	-	II, IV, VI	Oceanic Shoals Marine Park covers an area of 71,743 km ² and is located west of the Tiwi Islands, ~155 km north-west of Darwin, NT and 305 km north of Wyndham, WA. The Oceanic Shoals Marine Park is located within both the NWMR and NMR.	Oceanic Shoals Marine Park is significant because it contains habitats, species and ecological communities associated with the Northwest Shelf Transition bioregion. It contains four KEFs: Carbonate bank and terrace systems of the Van Diemen Rise; Carbonate bank and terrace systems of the Sahul Shelf; Pinnacles of the Bonaparte Basin; and Shelf break and slope of the Arafura Shelf. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging and interesting habitat for marine turtles.
State Marine Parks and Reserves						
North Kimberley Marine Park	✓	-	-	Sanctuary, Special Purpose and General Use Zones	The North Kimberley Marine Park covers approx. 18,450 km ² with its south-western boundary located ~270 km north-east of Derby.	The coral reefs of the north Kimberley have the greatest diversity in Western Australia and are some of the most pristine and remarkable reefs in the world. The park surrounds more than 1000 islands and is home to listed species such as dugongs, marine turtles, and sawfishes (DPAW, 2016a).
Lalang-garram / Horizontal Falls Marine Park and North Lalang-garram Marine Park (Jointly managed)	✓	-	-	Sanctuary, Special Purpose and General Use Zones	The Lalang-garram / Horizontal Falls Marine Park covers ~3530 km ² from Talbot Bay in the west and Gleneleg River in the east. The North Lalang-garram Marine Park covers ~1100	The Lalang-garram / Horizontal Falls Marine Park's most celebrated attraction is created by massive tides of up to 10 m and narrow gaps in two parallel tongues of land meaning the tide falls faster than the water can escape, producing 'horizontal falls'. There are also islands with fringing coral reefs and mangrove-lined creeks and bays. The North Lalang-garram Marine Park has a number of islands fringed with coral reef and has been identified as an

Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Lalang-garram / Camden Sound Marine Park	✓	-	-	Sanctuary, Special Purpose and General Use Zones	km ² between Camden Sound and North Kimberley Marine Parks.	ecological hotspot and supports more than 1% of the world's population of brown boobies, with up to 2000 breeding pairs. About 500 pairs of crested terns also nest on the island (DPAW, 2016b).
Rowley Shoals Marine Park	-	✓	-	Sanctuary, Recreation and General Use Zones	The Rowley Shoals comprise of three reef systems, Mermaid Reef, Clerke Reef and Imperieuse Reef, all 30-40 km apart. These reef systems are located ~300 km west north-west of Broome.	The Lalang-garram / Camden Sound Marine Park is the most important humpback whale nursery in the Southern Hemisphere. It also features the spectacular coastal Montgomery Reef. The marine park is home to six species of threatened marine turtle. Australian snubfin and Indo-Pacific humpback dolphins, dugongs, saltwater crocodiles, and several species of sawfish (DPAW, 2013). The three coral atolls of the Rowley Shoals Marine Park comprise of shallow lagoons inhabited by diverse corals and abundant marine life, each covering around 80 km ² at the edge of Australia's continental shelf. Further offshore, the seafloor slopes away to the abyssal plain, some 6000 m below. Undersea canyons slice the slope; these features are commonly associated with diverse communities of deep-water corals and sponges and create localised upwellings that aggregate pelagic species like tunas and billfish (DEC, 2007a).
Yawuru Nagulagun / Roebuck Bay Marine Park	-	✓	-	Special Purpose Zone	Yawuru Nagulagun / Roebuck Bay Marine Park is a series of intertidal flats lying on the coast to the south-east of Broome.	Roebuck Bay is an internationally significant wetland and one of the most important feeding grounds for migratory shorebirds in Australia. Australian snubfin and Australian humpback dolphins frequent the waters and humpback whales pass through on their annual migration. Flatback turtles nest on the shores and are found in the bay's waters with other sea turtle species. Seagrass and macroalgae communities provide food for protected species such as the dugong and flatback turtle (DPAW, 2016c).
Eighty Mile Beach Marine Park	-	✓	-	Sanctuary, Recreation, Special	Eighty Mile Beach Marine Park covers ~2000 km ² stretching across 220km of	Eighty Mile Beach Marine Park is one of the world's most important feeding grounds for small wading birds that migrate to the area each summer, travelling from countries

Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Montebello Islands Marine Park, Barrow Island Marine Park and Barrow Island Marine Management Area (jointly managed)	-	✓	-	Purpose and General Use Zones	coastline between Port Hedland and Broome.	thousands of kilometres away. The marine park is a major nesting area for flatback turtles which are found only in northern Australia. Sawfishes, dugongs, dolphins and millions of invertebrates inhabit the sand and mud flats, seagrass meadows, coral reefs and mangroves (DPAW, 2014). The Montebello/Barrow islands marine conservation reserves have very complex seabed and island topography, resulting in a myriad of different habitats subtidal coral reefs, macroalgal and seagrass communities, subtidal soft-bottom communities, rocky shores and intertidal reef platforms, which support a rich diversity of invertebrates and finfish. The reserves are important breeding areas for several species of marine turtles and seabirds, which use the undisturbed sandy beaches for nesting. Humpback whales migrate through the reserves and dugongs occur in the shallow warm waters (DEC, 2007b).
Ningaloo Marine Park and Muiron Islands Marine Management Area (jointly managed)	-	-	✓	Sanctuary, General Recreation, General Use and Special Purpose Zones	The Ningaloo Marine Park and Muiron Islands Marine Management Area are located off the north-west coast of WA, ~1600 km north of Perth, and cover areas of ~583 km ² , 42 km ² and 1,147 km ² , respectively.	Ningaloo Reef is the largest fringing coral reef in Australia. Temperate and tropical currents converge in the Ningaloo region resulting in highly diverse marine life including spectacular coral reefs, abundant fishes and species with special conservation significance such as turtles, whale sharks, dugongs, whales and dolphins. The region has diverse marine communities including mangroves, algae and filter-feeding communities and has high water quality. These values contribute to the Ningaloo Marine Park being regarded as the State's premier marine conservation icon. The Muiron Islands Marine Management Area is also important, containing a very diverse marine environment, with coral reefs, filter-feeding communities and macroalgal beds. In addition, the Islands are important seabird and green turtle nesting areas. (CALM, 2005a).

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Protected Area	Woodside Activity Area			IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
	Browse	NWS/S	NW Cape			
Shark Bay Marine Park and Hamelin Pool Marine Nature Reserve (jointly managed)	-	-	✓	Sanctuary, Recreation, General Use and Special Purpose Zones	The Shark Bay Marine Park and Hamelin Pool Marine Nature Reserves are located 400 km north of Geraldton, covering areas of ~7487 km ² and 1270 km ² , respectively.	Seagrass covers over 4000 km ² of the Shark Bay Marine Park, with 12 different species making it one of the most diverse seagrass assemblages in the world. Dugongs regularly use this habitat, with the bay containing one of the largest dugong populations in the world. Humpback whales also use the bay as a staging post in their migration along the coast. Green and loggerhead turtles occur in the bay with Dirk Hartog Island providing the most important nesting site for loggerheads in Western Australia. Hamelin Pool contains the most diverse and abundant examples of stromatolites found in the world. These are living representatives of stromatolites that existed some 3500 million years ago (CALM, 1996).

*Conservation objectives for IUCN categories include:

Ia: Strict Nature Reserve

Ib: Wilderness Area

Ii: national Park

Iii: Natural Monument or Feature

Iv: Habitat/Species Management Area

V: Protected Landscape

Vi: Protected area with sustainable use of natural resources – allow human use but prohibits large scale development.

IUCN categories for the marine park are provided and, in brackets, the IUCN categories for specific zones within each Marine Park as assigned under the North-west Marine Parks Network Management Plan 2018 (DNP, 2018a)

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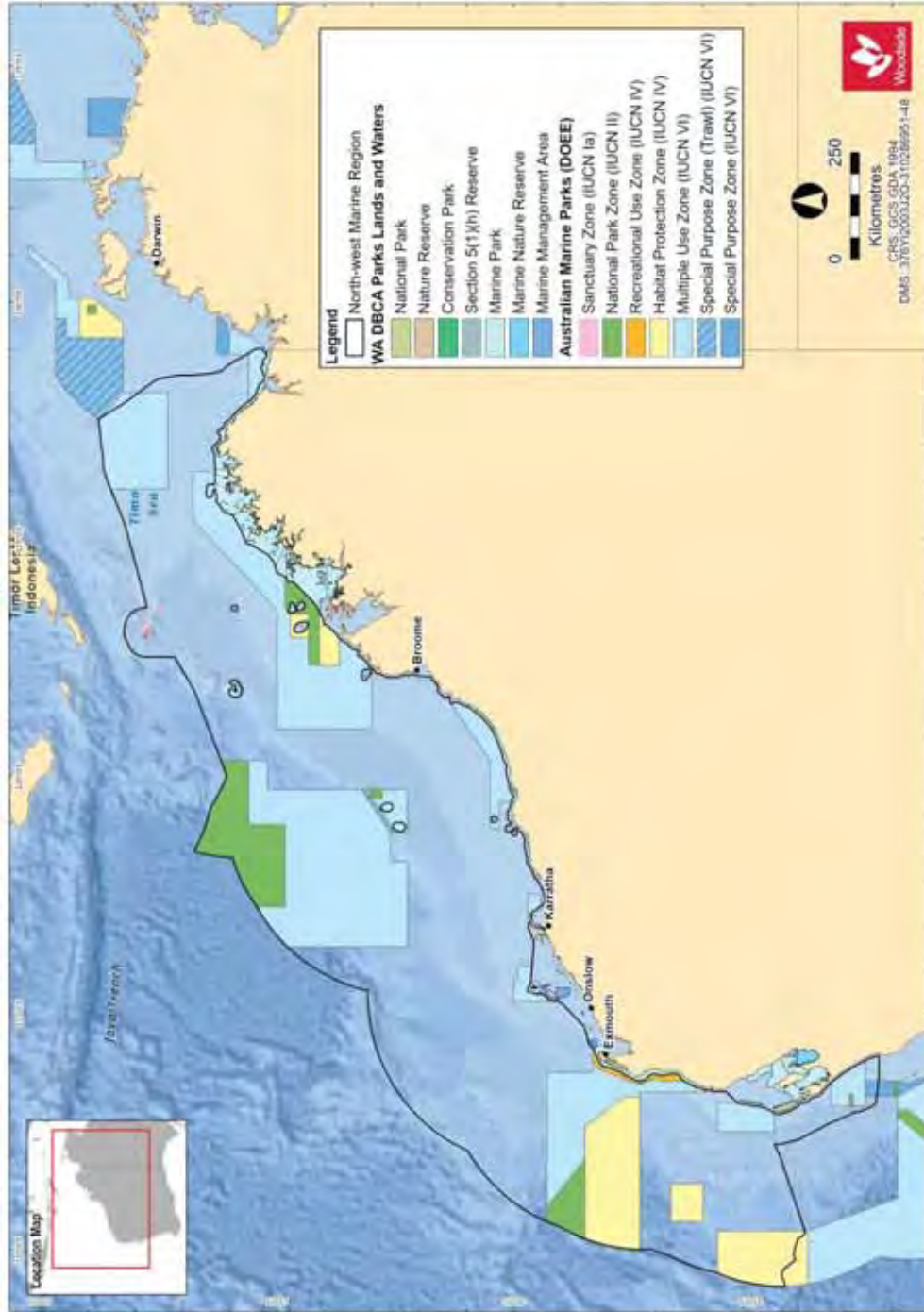


Figure 10-1 Commonwealth and State Marine Protected Areas for the NWMR

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10.10 Summary of Protected Areas within the SWMR

Table 10-2 Protected Areas within the SWMR

Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
World Heritage Properties			
N/A			
National Heritage Places - Natural			
N/A			
Commonwealth Heritage Places - Natural			
N/A			
Wetlands of International Importance (Ramsar)			
Beecher Point Wetlands	Ramsar	Beecher Point Wetlands is a system of about sixty small wetlands located near Rockingham in south-west WA, covering an area of around 7 km ² . The site was listed under the Ramsar Convention in 2001.	The wetlands support sedgelands, herblands, grasslands, open-shrublands and low open-forests. The sedgelands that occur within the linear wetland depressions of the Ramsar site are a nationally listed TEC. At least four species of amphibians and twenty-one (21) species of reptiles have been recorded on the site. The site also supports the southern brown bandicoot. The site meets criteria 1 and 2 of the Ramsar Convention.
Forrestdale and Thomsons Lakes	Ramsar	Forrestdale Lake is located in the City of Armadale and Thomsons Lake is located in the City of Cockburn both of which lie within the southern Perth metropolitan area, in Western Australia. The site was listed under the Ramsar Convention in 1990.	The lakes are surrounded by medium density urban development and some agricultural land. The sediments of Thomsons Lake are between 30,000 and 40,000 years old, which are the oldest lake sediments discovered in WA to date. These lakes are the best remaining examples of brackish, seasonal lakes with extensive fringing sedgeland, typical of the Swan Coastal Plain. The site meets criteria 1, 3, 5 and 6 of the Ramsar Convention.
Peel-Yalgorup System	Ramsar	Peel-Yalgorup System, located adjacent to the City of Mandurah in	Peel-Yalgorup System Ramsar site is the most important area for waterbirds in south-western Australia. It supports a large number of waterbirds, and a

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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
Vasse-wonnerup system	Ramsar	WA, is a large and diverse system of shallow estuaries, coastal saline lakes and freshwater marshes. The site was listed under the Ramsar Convention in 1990. Vasse-Wonnerup System Ramsar wetland is situated in the Perth Basin, south-western WA. The site was listed under the Ramsar Convention in 1990.	wide variety of waterbird species. It also supports a wide variety of invertebrates, and estuarine and marine fish. The site meets criteria 1, 3, 5 and 6 of the Ramsar Convention. Vasse-Wonnerup System is an extensive, shallow, nutrient-enriched wetland system of highly varied salinities. Large areas of the wetland dry out in late summer. Vasse-Wonnerup System supports tens of thousands of resident and migrant waterbirds of a wide variety of species. More than 80 species of waterbird have been recorded in the System such as red-necked avocets and black-winged stilts, wood sandpiper, sharp-tailed sandpiper, long-toed stint, curlew sandpiper and common greenshank. Thirteen waterbird species are also known to breed at the Ramsar site, including the largest regular breeding colony of black swans in south-western Australia. The site meets criteria 5 and 6 of the Ramsar Convention.
Wetlands of National Importance (DAWE, 2019)			
Rottneest Island Lakes		The Rottneest Island Lakes site is the cluster of 18 lakes and swamps on the north-east part of Rottneest Island.	An outstanding example of a series of lakes/swamps of varied depth and salinity located on an offshore island; the only island among 200 plus in WA exceeding 10 ha in area, that has a salt-lake complex; the only known example of seasonally meromictic lakes in Australia. The area meets criteria 1, 2, 3 and 6 for inclusion on the Directory of Important Wetlands in Australia.
Australian Marine Parks (DNP, 2018b)			
Abrolhos Marine Park	II, IV, VI	The Abrolhos Marine Park is located within both the NWMR and SWMR. Refer Table 10-1 for description and conservation values.	
Bremer Marine Park	II, VI	Bremer Marine Park covers an area of 4472 km ² and is located approximately half-way between Albany and Esperance, offshore from the Fitzgerald River National Park, extending from the WA State waters boundary.	Bremer Marine Park is significant because it contains habitats, species and ecological communities associated with two bioregions: <ul style="list-style-type: none"> • Southern Province • South-west Shelf Province. It includes two KEFs: Albany Canyon group and adjacent shelf break, and Ancient coastline at 90-120 m depth.
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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
Eastern Recherche Marine Park	II, VI	Eastern Recherche Marine Park covers an area of 20,575 km ² and is located ~135 km east of Esperance, adjacent to the Recherche Archipelago, close to the WA Cape Arid National Park.	<p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions, and white sharks, a migratory pathway for humpback whales, and a significant calving area for southern right whales. The AMP includes canyons—important aggregation areas for killer whales.</p> <p>Eastern Recherche Marine Park is significant because it contains habitats, species and ecological communities associated with three bioregions:</p> <ul style="list-style-type: none"> • South-west Shelf Province • Southern Province • Great Australian Bight Shelf Transition. <p>It includes three KEFs: Mesoscale eddies; Ancient coastline at 90-120 m depth; and Commonwealth marine environment surrounding the Recherche Archipelago.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions and white sharks, and a calving buffer area for southern right whales.</p>
Geographe Marine Park	II, IV, VI	Geographe Marine Park covers an area of 977 km ² and is located in Geographe Bay, ~8 km west of Bunbury and 8 km north of Busselton, adjacent to the WA Ngari Capes Marine Park.	<p>Geographe Marine Park is significant because it contains habitats, species and ecological communities associated with the South-west Shelf Province bioregion.</p> <p>It includes two KEFs: Commonwealth marine environment within and adjacent to Geographe Bay; and Western rock lobster.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, a migratory pathway for humpback and pygmy blue whales, and a calving buffer area for southern right whales.</p> <p>Great Australian Bight Marine Park is significant because it contains habitats, species and ecological communities associated with two bioregions:</p> <ul style="list-style-type: none"> • Great Australian Bight Shelf Transition • Southern Province. <p>It includes three KEFs: Ancient coastline at 90-120 m depth; Benthic invertebrate communities of the eastern Great Australian Bight; and Small pelagic fish of the South-west Marine Region.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions, white sharks and</p>
Great Australian Bight Marine Park	II, VI	Great Australian Bight Marine Park covers an area of 45,822 km ² and is located ~12 km south-east of Eucla and 174 km west of Ceduna, adjacent to the SA Far West Coast and Nuyts Archipelago Marine Parks.	<p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, a migratory pathway for humpback and pygmy blue whales, and a calving buffer area for southern right whales.</p> <p>Great Australian Bight Marine Park is significant because it contains habitats, species and ecological communities associated with two bioregions:</p> <ul style="list-style-type: none"> • Great Australian Bight Shelf Transition • Southern Province. <p>It includes three KEFs: Ancient coastline at 90-120 m depth; Benthic invertebrate communities of the eastern Great Australian Bight; and Small pelagic fish of the South-west Marine Region.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions, white sharks and</p>

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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
Jurien Marine Park	II, VI	Jurien Marine Park covers an area of 1851 km ² and is located ~148 km north of Perth and 155 km south of Geraldton, adjacent to the WA Jurien Bay Marine Park.	pygmy blue and sperm whales, and a calving area, migratory pathway and large aggregation area for southern right whales.
Perth Canyon Marine Park	II, IV, VI	Perth Canyon Marine Park covers an area of 7409 km ² and is located ~52 km west of Perth and ~19 km west of Rottnest Island.	<p>Jurien Marine Park is significant because it includes habitats, species and ecological communities associated with two bioregions:</p> <ul style="list-style-type: none"> • South-west Shelf Transition • Central Western Province. <p>It includes three KEFs: Ancient coastline at 90-120 m depth; Demersal slope and associated fish communities of the Central Western Province; and Western rock lobster</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions and white sharks, and a migratory pathway for humpback and pygmy blue whales.</p> <p>Perth Canyon Marine Park is significant because it includes habitats, species and ecological communities associated with four bioregions:</p> <ul style="list-style-type: none"> • Central Western Province • South-west Shelf Province • Southwest Transition • South-west Shelf Transition. <p>It includes four KEFs: Perth Canyon and adjacent shelf break, and other west-coast canyons; Demersal slope and associated fish communities of the Central Western Province; Western rock lobster; and Mesoscale eddies.</p> <p>The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Antarctic blue, pygmy blue and sperm whales, a migratory pathway for humpback, Antarctic blue and pygmy blue whales, and a calving buffer area for southern right whales.</p>
South-west Corner Marine Park	II, IV, VI	South-west Corner Marine Park covers an area of 271,833 km ² and is located adjacent to the WA Ngari Capes Marine Park. It covers an extensive offshore area that is closest to WA State waters ~48 km west of Esperance, 73 km west of Albany and 68 km west of Bunbury.	<p>South-west Corner Marine Park is significant because it contains habitats, species and ecological communities associated with three bioregions:</p> <ul style="list-style-type: none"> • Southern Province • South-west Shelf Transition • South-west Shelf Province. <p>It includes six KEFs: Albany Canyon group and adjacent shelf break; Cape Mentelle upwelling; Diamantina Fracture Zone; Naturaliste Plateau; Western rock lobster; and Ancient coastline at 90 m-120 m depth.</p>

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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
Twilight Marine Park	II, VI	Twilight Marine Park covers an area of 4641 km ² and is located ~245 km south-west of Eucla and 373 km north-east of Esperance, adjacent to the WA State waters boundary.	The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions, white sharks and sperm whales, a migratory pathway for Antarctic blue, pygmy blue and humpback whales, and a calving buffer area for southern right whales. Twilight Marine Park is significant because it contains habitats, species and ecological communities associated with the Great Australian Bight Shelf Transition bioregion. The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds, Australian sea lions and white sharks, and a calving buffer area for southern right whales.
Two Rocks Marine Park	II, VI	Two Rocks Marine Park covers an area of 882 km ² and is located ~25 km north-west of Perth, to the north-west of the WA Marmion Marine Park.	Two Rocks Marine Park is significant because it includes habitats, species and ecological communities associated with the South-west Shelf Transition bioregion. It includes three KEFs: Commonwealth marine environment within and adjacent to the west-coast inshore lagoons; Western rock lobster; and Ancient coastline at 90-120 m depth. The AMP supports a range of species including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat for seabirds and Australian sea lions, a migratory pathway for humpback and pygmy blue whales, and a calving buffer area for southern right whales.
State Marine Parks and Reserves			
Jurien Bay Marine Park	Sanctuary, Special Purpose and General Use Zones.	The Jurien Bay Marine Park is located on the central west coast of WA ~200 km north of Perth and covers an area of 824 km ² .	An extensive limestone reef system parallel to the shore has created a huge shallow lagoon that provides perfect habitat for Australian sea lions, dolphins and a myriad of juvenile fish. Extensive seagrass meadows inside the reef shelter many marine animals such as western rock lobsters, octopus and cuttlefish that make up the diet of young sea lions. The marine park also surrounds dozens of ecologically important islands that contain rare and endangered animals found nowhere else in the world (CALM, 2005b).
Marmion Marine Park	Sanctuary, Recreation and Special Use Zones.	The Marmion Marine Park lies within State waters between Trigg Island and Burns Beach and encompasses a coastal area of ~95 km ² . Marmion	The marine park has a number of sanctuary zones including Little Island, The Lumps and the Boyinaboat Reef protecting a variety of habitats from limestone reefs, seagrass beds and clear shallow lagoons that support a diversity of marine life. In addition, to a general use zone and the Waterman Recreation Area. The marine park contains important habitat for the endemic Australian

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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
Swan Estuary Marine Park	Special Purpose and Nature Reserve Zones.	Marine Park was the State's first marine park, declared in 1987. Three biologically important areas of Perth's Swan River make up the Swan Estuary Marine Park, including Alfred Cove, Pelican Point and Crawley. These three sites cover a total area of 3.4 km ² .	sea lion, an array of seabird species migratory whales are regular visitors (CALM, 1992; DPAW, 2016d). The sand flats, mud flats and beaches at the three locations of the Swan Estuary Marine Park provide the only remaining significant feeding and resting areas in the Swan Estuary, for trans-equatorial migratory wading and waterbirds. The Park and adjacent reserves also provide habitat for a diverse assemblage of aquatic and terrestrial flora and fauna (CALM, 1999).
Shoalwater Islands Marine Park	Sanctuary, Special Purpose and General Use Zones.	The Shoalwater Islands Marine Park is located adjacent to Rockingham on the south-west coast of WA, ~50 km south of Perth and covers an area of ~66 km ² .	The Shoalwater Islands Marine Park consists of a complex seabed and coastal topography consisting of islands, limestone ridges and reef platforms, protected inshore areas and deeper basins, sandbars and beaches, and is home to five species of cetacean and 14 species of sea and shore bird. The waters of the marine park are also used to access feeding grounds for the little penguin (<i>Eudyptula minor</i>) colony on Penguin Island, which is close to the northernmost limit of the species' range and is the largest known breeding colony in Western Australia (DEC, 2007c).
Ngari Capes Marine Park	Sanctuary, Special Purpose and Recreation Zones.	The Ngari Capes Marine Park is located off the south-west coast of WA, ~250 km south of Perth, covering ~1238 km ² .	The Ngari Capes Marine Park consists of a complex arrangement of sandy bays, high energy limestone and granite reefs bordered by headlands and cliffs and two weathered capes. Coral communities consist of both tropical and temperate species. Cetaceans and pinnipeds are resident in and/or transient through the marine park as well as a diverse range of seabirds and shorebirds (DEC, 2013).
Walpole and Normalup Inlets Marine Park	Recreation Zone.	The Walpole and Normalup Inlets Marine Park is located adjacent to the towns of Walpole and Normalup on the south coast of WA, ~120 km west of Albany, and covers ~14 km ² .	The Walpole and Normalup Inlets Marine Park consists of a geologically complex lagoonal estuarine system comprising three significant rivers and two connected inlets that are permanently open to the ocean. Approximately 40 marine and estuarine finfish species commonly inhabit the inlet system, as well as a variety of shark and ray species and numerous seabirds and shorebirds. The sandy beaches and shoreline vegetation of the inlet system are of high ecological and social importance to the marine park (DEC, 2009).

*Conservation objectives for IUCN categories include:

Ia: Strict Nature Reserve

Ib: Wilderness Area

Ii: national Park

Iii: Natural Monument or Feature

Iv: Habitat/Species Management Area

V: Protected Landscape

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VI: Protected area with sustainable use of natural resources – allow human use but prohibits large scale development.
IUCN categories for the marine park are provided and, in brackets, the IUCN categories for specific zones within each Marine Park as assigned under the South-west Marine Parks Network Management Plan 2018 (DNP, 2018b)

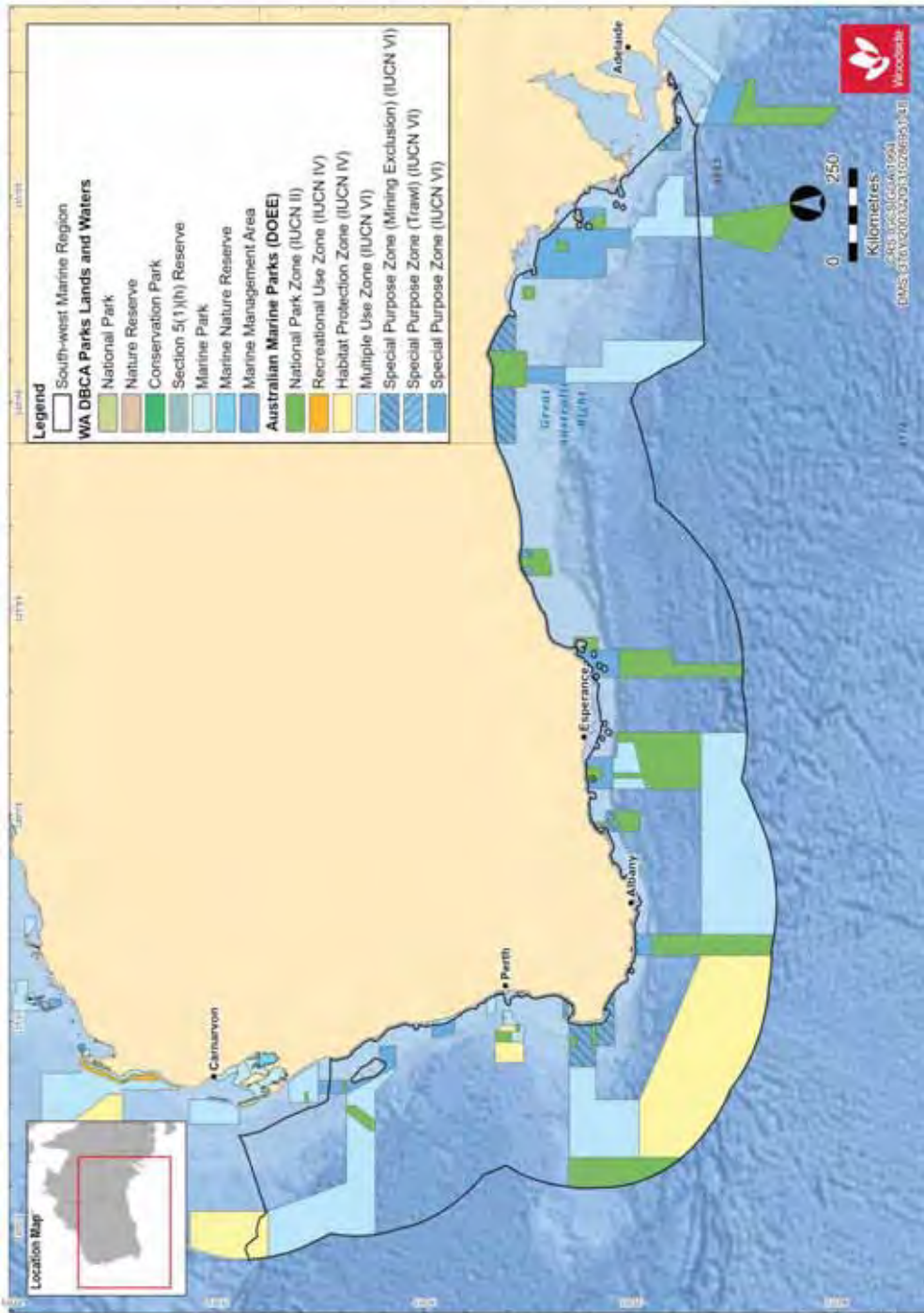


Figure 10-2. Commonwealth and State Marine Protected Areas for the SWMR

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10.11 Summary of Protected Areas within the NMR

Table 10-3 Protected Areas within the NMR

Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
World Heritage Properties			
Kakadu National Park		Kakadu National Park is a living landscape with exceptional natural and cultural values. It is the largest National Park in Australia and preserves the greatest variety of ecosystems on the Australian continent including extensive areas of floodplains, mangroves, tidal mudflats, coastal areas and monsoon forests. The park was inscribed the World Heritage list in three stages over 11 years. It is located in tropical north Australia covering a total area of 19,804 square kilometres.	The conservation values reflect the WHA Criterion: (i), (vi), (vii) and (ix): Natural features relate to Criterion (vii) – the remarkable contrast between the internationally recognised Ramsar-listed wetlands and the spectacular rocky escarpment and its outliers and Criterion (ix) – four major river systems of tropical Australia and floodplains that are dynamic environments, shaped by changing sea levels and big floods every wet season. These floodplains illustrate the ecological and geomorphological effects that have accompanied Holocene climate change and sea level rise. Kakadu National Park contains important and significant habitats supporting a diverse range of flora and fauna.
National Heritage Places - Natural			
Kakadu National Park		Refer to World Heritage property description above.	Refer to World Heritage property conservation values above
Commonwealth Heritage Places - Natural			
N/A			
Wetlands of International Importance (Ramsar)			
Kakadu National Park		Australian Ramsar site number 2. The stage 1 and 2 Ramsar sites, established in 1980, 1985 and 1989, respectively were combined into a single Ramsar site in 2010.	The Kakadu National Park Ramsar site straddles the western edge of the Arnhem Land Plateau encompassing a range of landforms and extensive floodplains. It is a mosaic of contiguous wetlands comprising the catchments of two large river systems, the East and South Alligator rivers and encompasses extensive tidal mudflat areas. It is an internationally important site for migratory shorebirds as part of the EAAF.
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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
Cobourg Peninsula		Australian Ramsar site number 1 established in 1974. This Ramsar site includes freshwater and extensive intertidal areas but excludes subtidal areas. It is in a remote location and there has been minimal human impact on the site.	The wetlands encompassed in the Ramsar site are some of the better protected and near-natural wetlands in the bioregion and there is a diverse array of wetland in a confined area. The site supports important turtle nesting habitat and habitat for coastal dolphin species and is an internationally significant migratory shorebird habitat as part of the EAAF and an important location for seabird breeding colonies.
Wetlands of National Importance (DAWE, 2019)			
Southern Gulf Aggregation		The site is a complex continuous wetland aggregation in the Gulf of Carpentaria, covering an area of ~5460 km ² located 58 km east of Burketown, Queensland.	The Southern Gulf Aggregation is the largest continuous estuarine wetland aggregation of its type in northern Australia. It is one of the three most important areas for shorebirds in Australia. The area meets criteria 1, 2, 3, 4, 5 and 6 for inclusion on the Directory of Important Wetlands in Australia.
Australian Marine Parks (DNP, 2018c)			
Arafura Marine Park	VI	Arafura Marine Park covers an area of 22,924 km ² is located ~256 km north-east of Darwin and 8 km offshore of Croker Island, NT. It extends from NT waters to the limit of Australia's EEZ.	The AMP is significant because it contains habitats, species and ecological communities associated with two bioregions: <ul style="list-style-type: none"> Northern Shelf Province Timor Transition. It includes one KEF: Tributary canyons of the Arafura Depression. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include interesting habitat for marine turtles and important foraging and breeding habitat for seabirds.
Arnhem Marine Park	VI	Arnhem Marine Park covers an area of 7125 km ² and is located ~100 km south-east of Croker Island and 60 km south-east of the Arafura Marine Park. It extends from NT waters surrounding the Goulburn Islands, to the waters north of Maningrida.	Arnhem Marine Park is significant because it contains habitats, species and ecological communities associated with the Northern Shelf Province bioregion. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include foraging habitat and a migratory pathway for marine turtles and seabirds.
Gulf of Carpentaria Marine Park	II, VI	Gulf of Carpentaria Marine Park covers an area of 23,771 km ² and is located ~90 km north-west of Karumba, Queensland and is adjacent to the Wellesley Islands in	Gulf of Carpentaria Marine Park is significant because it contains habitats, species and ecological communities associated with the Northern Shelf Province bioregion.
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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
		the south of the Gulf of Carpentaria basin.	It includes four KEFs: Gulf of Carpentaria basin; Gulf of Carpentaria coastal zone; Plateaux and saddle north-west of the Wellesley Islands; and Submerged coral reefs of the Gulf of Carpentaria. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and foraging areas for seabirds and interesting and foraging areas for turtles.
Joseph Bonaparte Gulf Marine Park	VI	The Joseph Bonaparte Gulf Marine Park is located within both the NWMR and NMR. Refer Table 10-1 for description and conservation values.	
Limmen Marine Park	IV	Limmen Marine Park covers an area of 1399 km ² and is located ~315 km south-west of Nhulunbuy, NT, in the south-west of the Gulf of Carpentaria. It extends from NT waters, between the Sir Edward Pellew Group of Islands and Maria Island in the Limmen Bight, adjacent to the NT Limmen Bight Marine Park.	Limmen Marine Park is significant because it contains habitats, species and ecological communities associated with the Northern Shelf bioregion. It includes one KEF: Gulf of Carpentaria coastal zone. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include interesting and foraging habitat for marine turtles.
Oceanic Shoals Marine Park	II, IV, VI	The Oceanic Shoals Marine Park is located within both the NWMR and NMR. Refer Table 10-1 for description and conservation values.	
Wessel Marine Park	IV, VI	Wessel Marine Park covers an area of 5908 km ² and is located ~22 km east of Nhulunbuy, NT. It extends from NT waters adjacent to the tip of the Wessel Islands to NT waters adjacent to Cape Arnhem.	Wessel Marine Park is significant because it contains habitats, species and ecological communities associated with the Northern Shelf bioregion. It includes one KEF: Gulf of Carpentaria basin. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding habitat for seabirds and interesting and foraging habitat for marine turtles.
West Cape York Marine Park	II, IV, VI	West Cape York Marine Park covers an area of 16,012 km ² and is located adjacent to the northern end	West Cape York Marine Park is significant because it contains species and ecological communities associated with two bioregions: • Northeast Shelf Transition

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Protected Area	IUCN Protected Area Category* or Relevant Park Zone	Description	Conservation Values
		of Cape York Peninsula ~25 km south-west of Thursday Island and 40 km north-west of Weipa, Queensland.	<ul style="list-style-type: none"> Northern Shelf Province. It includes two KEFs: Gulf of Carpentaria basin; and Gulf of Carpentaria coastal zone. The AMP supports a range of species, including species listed as threatened, migratory, marine or cetacean under the EPBC Act. BIAs within the AMP include breeding and foraging habitat for seabirds, interesting and foraging habitat for marine turtles and dugong, and foraging, breeding and calving habitat for dolphins.
Territory Marine Parks and Reserves			
Cobourge Marine Park	II, IV, VI	Cobourge Marine Park covers an area of 2,290 km ² and is located in the waters surrounding the Cobourge Peninsula ~220 km north-east of Darwin. The Marine Park is part of the larger Garig Gunak Barlu National Park. Garig Gunak Barlu National Park includes both the Marine Park and the Cobourge Sanctuary.	Cobourge Marine Park is located in the Cobourge and Van Diemen Gulf marine bioregions with the northern portion of the Park covered by the Cobourge marine bioregion and the southern portion covered by the Van Diemen Gulf marine bioregion. The Marine Park is characterised by a number of deeply incised bays and estuaries on its northern shores. These bays are ancient river valleys that were drowned during periods of sea level rise and provide a varied environment and habitat that is quite distinct from the open water areas of the Park. The areas of the Park that have been studied and where extensive collections have been made indicates that the Park supports rich and diverse marine life including live coral reefs, seagrass, diverse reef and pelagic fish populations, marine turtles and dugong.

*Conservation objectives for IUCN categories include:

Ia: Strict Nature Reserve

Ib: Wilderness Area

II: National Park

III: Natural Monument or Feature

IV: Habitat/Species Management Area

V: Protected Landscape

VI: Protected area with sustainable use of natural resources – allow human use but prohibits large scale development.

IUCN categories for the marine park are provided and, in brackets, the IUCN categories for specific zones within each Marine Park as assigned under the North Marine Parks Network Management Plan 2018 (DNP, 2018c)

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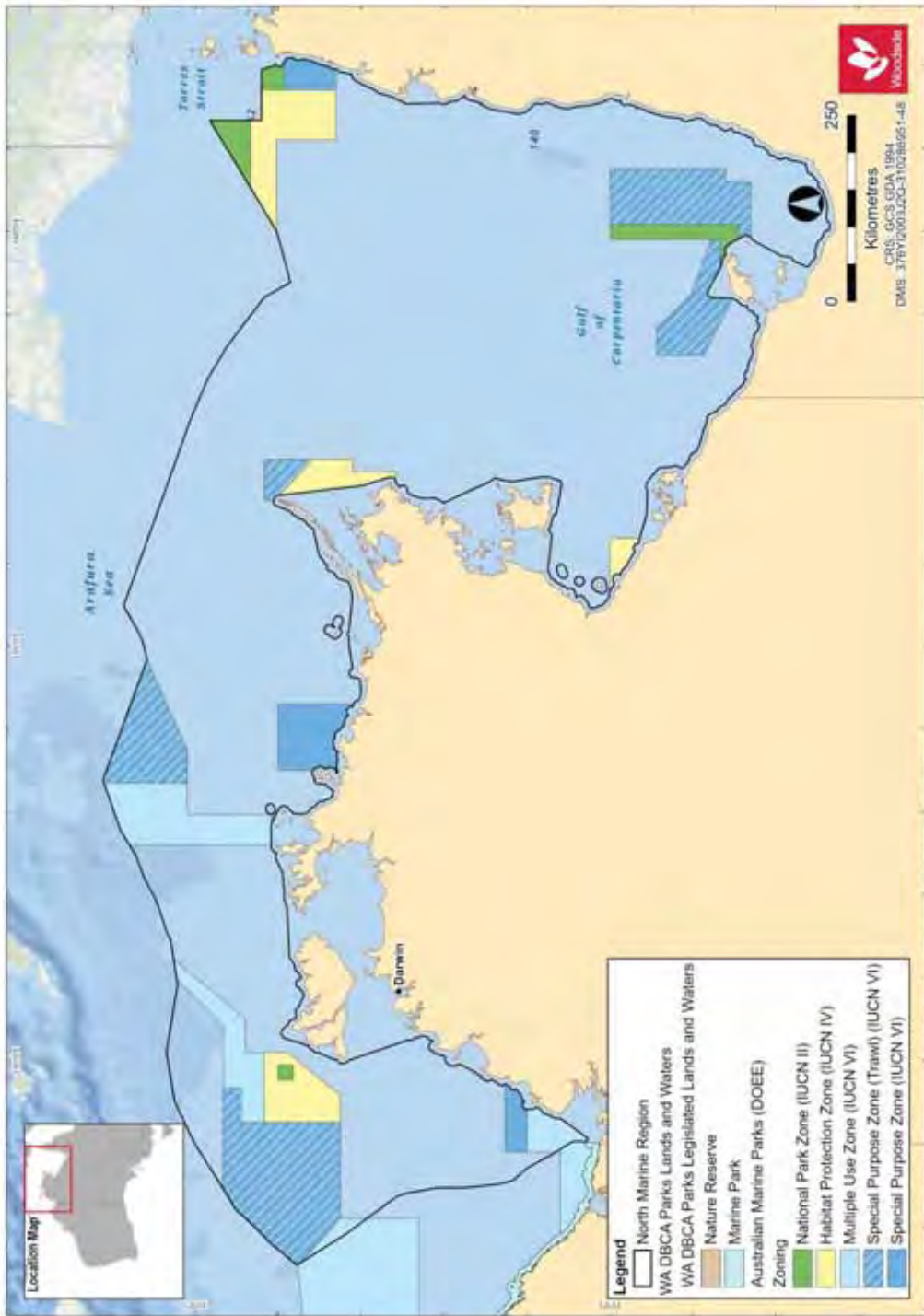


Figure 10-3. Commonwealth and State Marine Protected Areas within the NMR

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11. SOCIO-ECONOMIC AND CULTURAL ENVIRONMENT

This section summarises the information relating to the socio-economic and cultural environment of the regions offshore Western Australia, with a focus on the NWMR and to a lesser extent the SWMR and NWR.

The cultural environment includes Indigenous and European heritage values, including underwater values such as historic shipwrecks. Socio-economic values include commercial and traditional fishing, tourism and recreation, shipping, oil and gas activities and defence activities.

11.1 Cultural Heritage

11.1.1 Indigenous Sites of Significance

Murujuga (the Burrup Peninsula) has a very high density of significant Indigenous heritage sites and places with tangible and intangible heritage values. The area has one of the largest, densest, and most diverse collections of rock art in the world. It is estimated that the peninsula and surrounding islands contain over a million petroglyphs (rock engravings) covering a broad range of styles and subjects. The landscape also contains quarries, middens, fish traps, rock shelters, ceremonial sites, artefact scatters, grinding patches and stone arrangements that evidence tens of thousands of years of human occupation. These places are linked to Aboriginal cosmology, Dreaming stories and songs through the stories, knowledge and customs that are still held by traditional custodians.

In 2007 the Dampier Archipelago (including the Burrup Peninsula) was included on the National Heritage List due to outstanding heritage values relating to Australia's cultural history contained in the large number, density, diversity, distribution and fine execution of rock art. Within the National Heritage Place, the Murujuga National Park covers 4913 ha and is co-managed by the Murujuga Aboriginal Corporation and the Department of Biodiversity, Conservation and Attractions. The Murujuga Cultural Landscape was also added to Australia's Tentative World Heritage List in 2020, with full World Heritage Listing anticipated in 2024.

Woodside also recognises the potential for heritage to survive in submerged landscapes. Sea-level rises since the last ice age mean that areas now under the sea were once exposed, that many of today's islands would have been connected to the mainland, and that Aboriginal people are highly likely to have inhabited these places. Woodside works with traditional custodians, academics and heritage professionals to identify tangible and intangible heritage values in the submerged landscape to avoid disturbing heritage where possible and to minimise impacts where heritage cannot be avoided.

It is an offence to excavate, destroy, damage, conceal or alter Indigenous heritage onshore or in state waters under section 17 of the *Aboriginal Heritage Act 1972 (WA) (AHA)* without ministerial authorisation. Where there is a risk of injury or desecration to a significant Aboriginal area, even where permitted under the AHA, any Aboriginal person may apply to the federal Environment Minister for a declaration under sections 9 or 10 of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)* for the protection and preservation of that area.

The Department of Planning, Lands and Heritage maintains a register of registered sites and heritage places including middens, burial, ceremonial [sites], artefacts, rock shelters, mythological [sites] and engraving sites. There are over 1600 registered sites on Murujuga and the Dampier Archipelago with around 1100 other heritage places. This register is not comprehensive and will be complemented by heritage surveys where necessary. Protection of National and World Heritage values is also legislated through various provisions of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*. Murujuga National Park is managed under the *Conservation and Land Management Act 1984 (WA)*.

11.1.2 European Sites of Significance

European sites of significance and heritage value are found along adjacent foreshores of the SWMR, NWMR and NWR. Heritage values are protected in Western Australia under the *Heritage Act 2018*.

11.1.3 Underwater Cultural Heritage

Places of historic cultural significance are protected under Commonwealth, State and local regimes. Places inscribed on the National or World Heritage list are protected through various provisions of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth). Historic places may also be protected under the *Heritage Act 2018* (WA); under section 129 the prohibited alteration, demolition, damage, despoilment or removal of objects from a registered place may result in a fine of A\$1 million. Protection of heritage by local government typically emanates from local planning schemes produced under Part 5 of the *Planning and Development Act 2005* (WA).

The remains of vessels and aircraft in Commonwealth waters, along with any associated article, are automatically protected under the *Underwater Cultural Heritage Act 2018* (Cth) after 75 years. Remains and relics of any ship lost, wrecked or abandoned in Western Australian waters before 1900 are protected by the *Maritime Archaeology Act 1973* (WA).

The Australian National Shipwreck Database and the WA Maritime Museum Shipwreck Database list these protected wrecks.

11.1.4 National and Commonwealth Listed Heritage Places

Australia's National Heritage Sites are those of outstanding natural, historic and/or Indigenous significance to Australia. National Heritage places classed as natural are discussed in **Section 10.3**. Historic and/or Indigenous National Heritage Listed Places of the NWMR include:

- Dampier Archipelago (including Burrup Peninsula)
- Dirk Hartog Landing Site/Cape Inscription
- HMAS Sydney II and the HSK Kormoran Shipwreck Sites
- Batavia Shipwreck Site and Survivor Camps Area 1629 – Houtman Abrolhos

Commonwealth Heritage Places are a collection of sites recognised for their Indigenous, historical and/or natural values, which are owned or controlled by the Australian Government. A number of these sites are owned or controlled by the Department of Defence, as well as Government agencies relating to maritime safety, customs and communication. Commonwealth Heritage places classed as natural are discussed in **Section 10.3**. Listed Heritage Places in the NWMR include:

- Mermaid Reef – Rowley Shoals (refer **Section 10.3**)
- Ashmore Reef National Nature Reserve (refer **Section 10.3**)
- Scott Reef and Surrounds – Commonwealth Area (refer **Section 10.3**)
- Ningaloo Marine Area (refer **Section 10.3**)

World Heritage Properties are those sites that hold universal value which transcends any value they may be held by any one nation. These sites and their qualities are detailed in the Convention concerning the Protection of the World Cultural and Natural Heritage (the World Heritage Convention), to which Australia is a founding member. The Protected Matters Search Report (**Appendix A**) lists two natural World Heritage Properties in the NWMR (refer **Section 10.2**). There are no cultural heritage listings located within the NWMR.

Summary tables of heritage places for NWMR, SWMR and NMR are presented in **Table 11-1**, **Table 11-2** and **Table 11-3**.

11.2 Summary of Heritage Places within the NWMR

Table 11-1 Heritage Places (Indigenous and Historic) within the NWMR

Heritage Places	Woodside Activity Area			Class	Description	Conservation Values
	Browse	NWS/S	NW Cape			
National Heritage Properties						
Dampier Archipelago (including Burrup Peninsula)	-	✓	-	Indigenous	The Dampier Archipelago (including the Burrup Peninsula) contains one of the densest concentrations of rock engravings in Australia with some sites containing thousands or tens of thousands of images.	The rock engravings comprise images of avian, marine and terrestrial fauna, schematised human figures, figures with mixed human and animal characteristics and geometric designs. At a national level it has an exceptionally diverse and dynamic range of schematised human figures some of which are arranged in complex scenes. The fine execution and dynamic nature of the engravings, particularly some of the composite panels, exhibit a degree of creativity that is unusual in Australian rock engravings.
Dirk Hartog Landing Site 1616 – Cape Inscription Area	-	-	✓	Historic	Cape Inscription is the site of the oldest known landings of Europeans on the WA coastline.	The Cape Inscription area displays uncommon aspects of Australia's cultural history because of the cumulative effect its association with these explorers and surveyors had on growing knowledge of the great southern continent in Europe. The association of the site with these early navigators stimulated the development of the European view of the great southern continent at a time when they began to look at the world with a modern scientific outlook.
Commonwealth Heritage Properties						
N/A						

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11.3 Summary of Heritage Places within the NMR

Table 11-2 Heritage Places (Indigenous and Historic) within the NMR

Heritage Places	Class	Description	Conservation Values
National Heritage Properties			
None			
Commonwealth Heritage Properties			
None			

11.4 Summary of Heritage Places within the SWMR

Table 11-3 Heritage Places (Indigenous and Historic) within the SWMR

Heritage Places	Class	Description	Conservation Values
National Heritage Properties			
Cheetup Rock Shelter	Indigenous	Cheetup meaning "place of the birds" is the name of a spacious rock shelter located in Cape Le Grand National Park, about 55 km east of Esperance in WA. Aboriginal people associated with the place identify themselves as Nyungar/Noongar, Ngadju (shortened from Ngadjunmaia) or Mirning.	Cheetup rock shelter provides outstanding evidence for the antiquity of processing and use of cycad seeds by Aboriginal people. The seeds of the cycad are extremely toxic and can cause speedy death if eaten fresh without proper preparation to remove the toxins. The presence of <i>Macrozamia riedlei</i> seeds in a pit lined with Xanthorrhoea (grass tree) leaf bases indicates that the Aboriginal people in the Esperance region had the knowledge to remove the toxins of this important source of carbohydrate and protein at least 13,200 years ago.

Heritage Places	Class	Description	Conservation Values
Batavia Shipwreck Site and Survivor Camps Area 1629 – Houtman Abrolhos	Historic	The Batavia and its associated sites hold an important place in the discovery and delineation of the WA coastline. The wreck of the Batavia, and other Dutch ships like her, convinced the VOC (Dutch East India Company) of the necessity of more accurate charts of the coastline and resulted in the commissioning of Vlamingh's 1696 voyage.	Because of its relatively undisturbed nature the archaeological investigation of the wreck itself has revealed a range of objects of considerable value as well as to artefact specialists and historians.
HMAS Sydney II and HSK Kormoran Shipwreck Sites	Historic	The naval battle fought between the Australian warship HMAS Sydney II and the German commerce raider HSK Kormoran off the WA coast during World War II was a defining event in Australia's cultural history. HMAS Sydney II was Australia's most famous warship of the time and this battle has forever linked the stories of these warships to each other. The loss of HMAS Sydney II along with its entire crew of 645 following the battle with HSK Kormoran, remains as Australia's worst naval disaster.	The shipwreck sites of HMAS Sydney II and HSK Kormoran have outstanding heritage value to the nation because of their importance in a defining event in Australia's cultural history and for their part in development of the process of the defence of Australia.
Commonwealth Heritage Properties			
Cliff Point Historic Sites	Historic	Cliff Head is a limestone bluff on the east coast of Garden Island. Evidence of occupation has been reported from the beach just north of the head, the immediate hinterland, the ridge above and on the south face of the ridge.	The Cliff Point Historic Site, individually significant within the area of Garden Island is important as the first site inhabited by Governor Stirling's party in 1829 when founding the colony of WA, and as WA's first official non-convict settlement. The site was occupied in the first instance by Captain Charles Fremantle before the arrival of Captain Stirling. The party occupied the site for two months before a move was made to the Swan River settlement on the mainland.
HMAS Sydney II and HSK Kormoran Shipwreck Sites	Historic	As above	As above
J Gun Battery	Historic	J Battery comprised two 155 mm long range guns, the other similar battery being at Cape Peron on the mainland at the entrance to Cockburn Sound. Located in the dune systems at the north western	J Gun Battery (1942) is individually significant within the area of Garden Island (Register No. 019544) and is historically important as the first gun battery constructed on Garden Island and as one of two long range gun batteries which played a

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Heritage Places	Class	Description	Conservation Values
		corner of Garden Island elements of the J Battery complex are now covered in part by sand.	strategic role in the coastal defences of Cockburn Sound and Fremantle following the entry of Japan into the Second World War (1939-45).

11.5 Fisheries - Commercial

11.5.1 Commonwealth and State Fisheries

The diverse range of habitats and species offshore WA has allowed for various fisheries to develop and operate throughout the region.

The Australian Fisheries Management Authority (AFMA) manages fisheries on behalf of the Commonwealth Government and is bound by objectives under the Commonwealth *Fisheries Management Act 1991*.

WA State commercial fisheries are managed by the WA Department of Primary Industries and Regional Development (WA DPIRD) under the WA *Fish Resources Management Act 1994* (FRMA), Fisheries Resources Management Regulations 1995, relevant gazetted notices and licence conditions, and applicable Fishery Management Plans.

Commonwealth and State managed fisheries that operate within the NWMR and in areas beyond this region are summarised in the **Table 11-4**.

Table 11-4 Commonwealth and State managed fisheries

Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
Commonwealth Managed Fisheries				
Southern Bluefin Tuna Fishery	✓	✓	✓	<p>Management area</p> <p>The Southern Bluefin Tuna Fishery (SBTF) covers the entire EEZ around Australia, out to 200 nm from the coast. They do not fish in the Woodside activity area.</p>
	<p>Species targeted</p> <p>Southern bluefin tuna (<i>Thunnus maccoyii</i>)</p>			<p>Fishing methods</p> <p>Longline and purse seine fishing.</p>
<p>Fishing effort</p> <p>Most of the Australian fishing effort is by purse-seine vessels in the Great Australian Bight and waters off South Australia during summer months, and by longline off the New South Wales coastline during winter months (Patterson <i>et al.</i>, 2020). SBTF is a fishery that is shared amongst many countries. Australia currently has a 35% share of the total global allowable catch, and while wild capture fishing in Australia to sell directly to market can occur anywhere throughout the SBTF's range, currently the vast majority of that quota is value-added through ranching (on-growing the wild captured fish for extra 5-6 months). Ranching requires significant infrastructure, a resident labour force, plus proximity to a fishery able to supply a large quantity of natural feed/sardines (40,000+ tonnes) (for example as available in Port Lincoln). North-west WA is critically important regardless of how the quota is fished because of the proximity to the single spawning ground of this global roaming species. The stock remains classified as overfished.</p>			<p>Fishing depth</p> <p>Southern bluefin tuna is a pelagic species which can be found to depths of 500 m (AFMA, 2021a)</p>	
<p>Active licences/vessels</p> <p>Seven purse seine vessels, 20 longline vessels (Patterson <i>et al.</i>, 2020).</p>				
Western Skipjack Tuna Fishery	✓	✓	✓	<p>Management area</p> <p>The combined western and eastern skipjack tuna (<i>Katsuwonus pelamis</i>) fisheries (STF) encompass the entire Australian EEZ. The Western Skipjack Tuna Fishery (WSTF) extends westward from the SA/Victorian border across the Great Australian Bight and around the west coast of WA to the Cape York Peninsula.</p>

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Fishery	Woodside Activity Area			Description		
	Browse	NWS/S	NW Cape	Species targeted	Fishing methods	Fishing depth
				Western skipjack tuna (<i>Katsuwonus pelamis</i>)	Fishers use purse seine gear (about 98% of catch) and sometimes pole and line when fishing for skipjack tuna.	Western skipjack tuna is a pelagic species that can be found to depths of 260 m (AFMA, 2021b).
				Fishing effort: The Skipjack Tuna Fishery (STF) has not been actively fished since the 2008-2009 fishing season (Patterson <i>et al.</i> , 2020). The management arrangements for this fishery will be reviewed if active boats re-enter the fishery.		
				Active licences/vessels: No active vessels operating since 2009.		
Western Tuna and Billfish Fishery	✓	✓	✓	Management area The Western Tuna and Billfish Fishery (WTBF) extends to the Australian EEZ boundary in the Indian Ocean.		
				Species targeted	Fishing methods	Fishing depth
				Bigeye tuna (<i>Thunnus obesus</i>) Yellowfin tuna (<i>Thunnus albacares</i>) Swordfish (<i>Xiphias gladius</i>) Albacore (<i>Thunnus alalunga</i>) Striped marlin (<i>Kajikia audax</i>)	Fishers mainly use pelagic longline fishing gear to catch the targeted species. Minor line (including handline, troll, rod and reel) can also be used.	Species have a broad depth distribution, with tuna occurring at 150 – 300 m, striped marlin at 150 m and swordfish at up to 600 m (BRS, 2007).
				Fishing effort: The WTBF operates in Australia's EEZ and high seas of the Indian Ocean. Fishing effort in recent years has been concentrated off south-west WA, with occasional activity off SA.		
				Active licences/vessels: Two pelagic longline vessels and two minor longline vessels (Patterson <i>et al.</i> , 2020).		
Western Deepwater Trawl Fishery			✓	Management area The Western Deepwater Trawl Fishery (WDTF) is located in deep water off WA, from the line approximating the 200 m isobath to the edge of the Australian Fishing Zone (AFZ).		

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Species targeted</p> <p>More than 50 species, historically dominated by six commercial finfish species or species groups: Orange roughy (<i>Hoplostethus atlanticus</i>) Oreos (Oreosomatidae) Boarfish (Pentacerotidae) Eteline snapper (Lutjanidae: Etelineae) Apsiline snapper (Lutjanidae: Apsilinae) Sea bream (Leithrinidae)</p> <p>Fishing methods</p> <p>Demersal trawl.</p> <p>Fishing depth</p> <p>Water deeper than 200 m, stakeholder consultation has indicated that this may be to depths of 800 m.</p>
				<p>Fishing effort:</p> <p>The number of vessels active in the fishery and total hours trawled have fluctuated from year to year. Notably, total hours trawled were relatively high for a brief period during the early 2000s when fishers targeted ruby snapper and deepwater bugs (Patterson <i>et al.</i>, 2020). Total fishing effort has been variable but relatively low since then. Effort in 2018-2019 (492 trawl hours) was less than half that of 2017-2018 (1108 trawl hours) (Patterson <i>et al.</i>, 2020).</p> <p>Active licences/vessels:</p> <p>One active vessel in 2018-2019 (Patterson <i>et al.</i>, 2020).</p>
	✓			<p>Management area</p> <p>The North-west Slope Trawl Fishery (NWS TF) extends, from 114 °E to 125 °E, from the 200 m isobath to the outer limit of the AFZ (200 nm from the coastline, which is the boundary of the Australian EEZ).</p>
North-west Slope Trawl Fishery	✓			<p>Species targeted</p> <p>Australian scampi (<i>Metanephrops australiensis</i>) and smaller quantities of velvet and Boschma's scampi (<i>M. velutinus</i> and <i>M. boschmai</i>) Mixed snappers have historically been an important component of the catch.</p> <p>Fishing methods</p> <p>Demersal trawl.</p> <p>Fishing depth</p> <p>Typically at depths of 350 to 600 m (Patterson <i>et al.</i>, 2017), however stakeholder consultation has indicated that this may be to depths of 800 m.</p>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>The NWSTF commenced in 1985 and the number of active vessels peaked at 21 in the 1986-1987 season and declined through the 1990s before increasing to 10 vessels in 2000-2001 and 2002-2002 seasons. Four vessels operated in the 2017-2018 and 2018-2019 seasons (Patterson <i>et. al.</i> 2020). Fishing for scampi occurs over soft, muddy sediments or sandy habitats, using demersal trawl gear on the continental slope (Patterson <i>et al.</i>, 2017).</p> <p>Four vessels (Patterson <i>et. al.</i>, 2020).</p>
State Managed Fisheries				
Pilbara Fish Trawl (Interim) Managed Fishery	✓			<p>Management area</p> <p>The Pilbara Trawl (Interim) Managed Fishery is of high intensity and is divided into two zones and an area governed by Schedule 5 (prohibited to trawling). In addition to the Prohibited Trawl Fishing area, no fish trawl units are allocated for use in Zone 1 or Areas 3 and 6 of Zone 2 (which comprises six management areas) (Newman <i>et al.</i>, 2020a). No fish trawl units have been allocated for use in Area 6 of Zone 2 since the management plan commenced operation in 1998.</p>
				<p>Species targeted</p> <p>The Pilbara Fish Trawl (Interim) Managed Fishery (PFTIMF) targets more than 50 scalefish species. The five main demersal scalefish species landed by the fisheries in the Pilbara region are blue-spotted emperor, crimson snapper, rosy threadfin bream, red emperor and goldband snapper in 2018 (Newman <i>et al.</i>, 2020a).</p>
				<p>Fishing effort:</p> <p>Based on State of the Fisheries annual reports provided by DPIRD, catch trends are seen to be increasing over the past reporting years:</p>

Fishery	Woodside Activity Area			Description						
	Browse	NWS/S	NW Cape							
				<p>Pilbara Trawl (Interim) Managed Fishery caught 1996 t in 2018-19, 1780 t in 2017-18, 1529 t in 2016-17, 1172 t in 2015-16, 1105 t in 2014-15.</p> <p>Two Pilbara Trawl (Interim) Managed Fishery vessels in 2017 (Newman <i>et al.</i>, 2020a). Active vessels data are confidential as there were fewer than three vessels in the Pilbara Fish Trawl Interim Managed Fishery (Newman <i>et al.</i>, 2020a).</p>						
Pilbara Trap Managed Fishery	✓	✓	✓	<p>The Pilbara Trap Fishery covers the area from Exmouth northwards and eastwards to the 120° line of longitude, and offshore as far as the 200 m isobath. Like the trawl fishery, the trap fishery is also managed using input controls in the form of individual transferable effort allocations monitored with a satellite-based vessel management system. The fishery includes six licences allocated to three vessels, operating principally from Onslow.</p>						
				<table border="1"> <thead> <tr> <th>Species targeted</th> <th>Fishing methods</th> <th>Fishing depths</th> </tr> </thead> <tbody> <tr> <td>Pilbara Trap Managed Fishery catch is made up of around 45-50 different fish species. The four main species landed by the fisheries in the Pilbara region are blue-spotted emperor, red emperor, goldband snapper and Rankin cod.</td> <td>Demersal fish traps.</td> <td>Greatest effort in waters less than 50 m depth targeting high value species such as red emperor and goldband snapper.</td> </tr> </tbody> </table>	Species targeted	Fishing methods	Fishing depths	Pilbara Trap Managed Fishery catch is made up of around 45-50 different fish species. The four main species landed by the fisheries in the Pilbara region are blue-spotted emperor, red emperor, goldband snapper and Rankin cod.	Demersal fish traps.	Greatest effort in waters less than 50 m depth targeting high value species such as red emperor and goldband snapper.
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				<p>Fishing effort</p> <p>Based on State of the Fisheries annual reports provided by DPIRD, catch trends are seen to be increasing over the past reporting years: Pilbara Trap Managed Fishery caught 563 t in 2018-19, 573 t in 2017-18, 495 t in 2016-17, 510 t in 2015-16, 268 t in 2014-15. In 2018, the total catch for the Pilbara Trap Managed Fishery was 563 t, making up 21% of the total catch by the Pilbara Demersal Scale Fishery (Newman <i>et al.</i>, 2019).</p>						

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Active licences/vessels</p> <p>In the 2019 season, there were six licences in the Pilbara Trap Managed Fishery, (Newman <i>et al.</i>, 2020a). Active vessels data are confidential as there were fewer than three vessels in the Pilbara Trap Managed Fishery (Newman <i>et al.</i>, 2019).</p>
Pilbara Line Managed Fishery	✓		✓	<p>Management area</p> <p>The Pilbara Line Managed Fishery boat licences are permitted to operate anywhere within "Pilbara waters", bounded by a line commencing at the intersection of 21°56'S latitude and the high water mark on the western side of the North-west Cape on the mainland of WA; west along the parallel to the intersection of 21°56'S latitude and the boundary of the AFZ and north to longitude 120°E.</p>
				<p>Species targeted</p> <p>The Pilbara Line Managed Fishery catch is made up around 45-50 different fish species.</p> <p>The Pilbara Line Managed Fishery targets similar demersal species to the Pilbara Trap and Trawl fisheries, as well as some deeper offshore species such as ruby snapper and eightbar grouper</p> <p>The Pilbara Line Managed Fishery operates on an exemption basis that enables licence holders to fish for any nominated five-month block during the year.</p>
				<p>Fishing method</p> <p>Demersal long line.</p>
				<p>Fishing depths</p> <p>Pilbara Line Fishing Depth: Operates up to a depth of 600 m.</p>
				<p>Fishing effort</p> <p>Based on State of the Fisheries annual reports provided by DPIRD, catch trends are seen to be increasing over the past reporting years: Pilbara Line Managed Fishery caught 93 t in 2018-19, 143 t in 2017-18, 126 t in 2016-17, 97 t in 2015-16, 40 t in 2014-15. The total catch in 2018 for the Pilbara Line Managed Fishery was 93 t, making up 3% of the total catch by the Pilbara Demersal Scalefish Fishery (Newman <i>et al.</i>, 2019).</p>

Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>In the 2018 season there are nine individual licences in the Pilbara Line Fishery, held by seven operators. Active vessels data is confidential as there were fewer than three vessels in the Pilbara Line Fishery (Newman <i>et al.</i>, 2018).</p> <p>The commercial fishery extends from Geraldton to the Northern Territory border. There are three managed fishing areas: Kimberley (Area 1), Pilbara (Area 2), and Gascoyne and West Coast (Area 3).</p>
Mackerel Managed Fishery	✓	✓	✓	<p>Active licences/vessels</p> <p>Management area</p> <p>Species targeted</p> <p>Spanish mackerel (<i>Scomberomorus commerson</i>) Grey mackerel (<i>S. semifasciatus</i>) Other species from the genus <i>Scomberomorus</i></p> <p>Fishing methods</p> <p>Near-surface trawling gear. Jig fishing.</p> <p>Fishing depth</p> <p>Previous engagement with WAFIC suggests that the depth of fisheries may extend to 70 m.</p>
				<p>Fishing effort:</p> <p>Most of the catch is taken from waters off the Kimberley coasts (Lewis and Brand-Gardner, 2018), reflecting the tropical distribution of mackerel species (Molony <i>et al.</i>, 2015). Most fishing activity occurs around the coastal reefs of the Dampier Archipelago and Port Hedland area, with the seasonal appearance of mackerel in shallower coastal waters most likely associated with feeding and gonad development before spawning (Mackie <i>et al.</i>, 2003). Based on State of the Fisheries annual reports provided by DPIRD, catch trends are as follows: 213 t in 2018-19 (the lowest on record (Lewis <i>et al.</i>, 2020), 283 t in 2017-18, 276 t in 2016-17, 302 t in 2015-16, 322 t in 2014-15.</p> <p>Active licences/vessels:</p> <p>Fifteen boats fished in 2018, with approximately 35-40 people directly employed in the Mackerel Managed Fishery, primarily from May-November (Lewis <i>et al.</i>, 2020).</p>
Marine Aquarium Managed Fishery	✓	✓	✓	<p>Management area</p> <p>The Marine Aquarium Managed Fishery is able to operate in all State waters. The fishery is typically more active in waters south of Broome and higher levels of effort around the Capes region, Perth, Geraldton, Exmouth, Dampier and Broome (Newman <i>et al.</i>, 2020b).</p> <p>Fishing methods</p> <p>Fishing depth</p>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Finfish, hard coral, soft coral, tridacnid clams, syngnathids (seahorses and pipefish), other invertebrates (including molluscs, crustaceans, echinoderms etc.), algae, seagrasses and 'live rock'.</p> <p>The fishery is diver-based, which typically restricts effort to safe diving depths (less than 30 m).</p> <p>Less than 30 m, as advised by WAFIC.</p>
				<p>Fishing effort: Total catch for the Marine Aquarium Managed Fishery in 2018 was 156,188 fishes, 32.025 t of coral, live rock and living sand and 176.02 L of marine plants and live feed.</p>
				<p>Active licences/vessels: Eleven licences were active in 2019 (Newman <i>et al.</i>, 2020b).</p>
Beche-de-mer Fishery	✓	✓	✓	<p>Management area Fishing occurs in the northern half of WA from Exmouth Gulf to the NT border and is managed under Ministerial Exemptions.</p>
				<p>Species targeted</p>
				<p>The sea cucumber fishery targets two main species: sandfish (<i>Holothuria scabra</i>) and redfish (<i>Actinopyga echinites</i>).</p>
				<p>Fishing methods Diving</p>
				<p>Fishing depth The targeted species typically inhabit nearshore in shallow depths.</p>
				<p>Fishing effort Based on State of the Fisheries annual reports provided by DPRID, catch trends are as follows: 62t in 2018 (Gaughan and Santoro, 2020), 135t in 2017, 93t in 2016, 38t in 2015</p>
				<p>Active licences/vessels Six active licences in 2019 (Hart <i>et al.</i>, 2019). Active vessels data is confidential as there were fewer than three vessels.</p>
Onslow Prawn Managed Fishery	✓			<p>Management area The Onslow Prawn Managed Fishery encompasses a portion of the continental shelf off the Pilbara.</p>
				<p>Species targeted</p>
				<p>Fishing methods</p>
				<p>Fishing depth</p>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>The fishery targets: Western king prawns (<i>Penaeus esculentus</i>) Brown tiger prawns (<i>Penaeus esculentus</i>) Blue endeavour prawns (<i>Metapenaeus endeavouri</i>)</p> <p>Low opening, otter prawn trawl systems.</p> <p>Prawn trawling takes place in water depths of approximately 30 metres and less (licence holder feedback). Fishery and or fishing activity overlaps the Beadon Creek dredging scope (Sporer <i>et al.</i>, 2015).</p>
				<p>Fishing effort: The total landings for the Onslow Prawn Managed Fishery in 2018 were less than 60 t below the target catch range (Kangas <i>et al.</i>, 2020a).</p>
				<p>Active licences/vessels: One vessel (Kangas <i>et al.</i>, 2020a).</p>
Pearl Oyster Managed Fishery	✓	✓	✓	<p>Management area Located in shallow coastal waters with the pearl oyster managed fishery designated by four zones extending from Exmouth to Kununurra and the seaward boundary demarcated by the 200 nm EEZ.</p>
				<p>Species targeted</p>
				<p>Pearl oysters (<i>Pinctada maxima</i>).</p> <p>Fishing methods Drift diving.</p> <p>Fishing depth Fishing effort is mostly focussed in shallow coastal waters (10-15 m depth), with a maximum depth of 35 m (Lulofs <i>et al.</i> 2002).</p>
				<p>Fishing effort: In 2018, catch was taken from Zones 2 and 3 with no fishing in Zone 1. The number of pearl oysters caught for 2018-19 was 614,002. Total effort was 15,637 dive hours, this was an increase from 2017 effort of 12,845 hours. No fishing occurred in Zone 1 in 2017 and 2018 (Gaughan and Santoro, 2020).</p>
				<p>Active licences/vessels: 15,637 diver hours (Hart <i>et al.</i>, 2020a).</p>
		✓	✓	<p>Management area The Pilbara Crab Managed Fishery comprises WA waters off the north-western coast of WA north of 23° 34' south latitude and west of 120° 00' east longitude. Areas of the fishery north and east of Exmouth and</p>

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Fishery	Woodside Activity Area			Description																														
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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
Specimen Shell Managed Fishery				<p>Geraldton, Perth, Mandurah, the Capes area and Albany (Hart <i>et al.</i>, 2020b). There are a number of closed areas where the SSMF is not permitted to operate. These include various marine parks and aquatic reserves, such as Ningaloo Marine Park.</p> <p>Species targeted</p> <p>The Specimen Shell Managed Fishery targets the collection of specimen shells for display, collection, cataloguing and sale.</p> <p>Fishing methods</p> <p>Collection is predominantly by hand when diving to wading in shallow, coastal waters, though in deeper water collection may be conducted by remotely operated vehicles (limited to one per licence).</p> <p>Fishing depth</p> <p>For collection by hand, (diver-based) this typically restricts effort to safe diving depths (less than 30 m). ROV collection could enable depths up to 300 m (Hart <i>et al.</i>, 2017). In the past there has been one licence holder in the Specimen Shell Managed Fishery who has trialled ROV means of shell collection, WAFIC have provided advice that this fishery is no longer active.</p>
				<p>Fishing effort:</p> <p>Information not available.</p>
				<p>Active licences/vessels:</p> <p>In 2018 there were 31 licences with only two divers allowed in the water per licences at one time (Hart <i>et al.</i>, 2018). The number of people employed regularly in the fishery is likely to be about 21 (Hart <i>et al.</i>, 2018).</p>
West Australian Abalone Fishery	✓	✓	✓	<p>Management area</p> <p>The Western Australian Abalone Fishery includes all coastal waters from the WA and SA border to the WA and NT border. The fishery is concentrated on the south coast and the west coast.</p> <p>Species targeted</p> <p>Greenlip abalone (<i>Haliotis laevis</i>) Brownlip abalone (<i>Haliotis conicopora</i>) Roe's abalone (<i>Haliotis roei</i>)</p> <p>Fishing methods</p> <p>Divers.</p> <p>Fishing depth</p> <p>Distribution to 5 m depth for Roe's abalone and 40 m depth for greenlip / brownlip abalone (DOF, 2011).</p>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Fishing effort: In 2018, the total commercial catch was 48 t, 1 t less than the catch in each of the last two seasons. No commercial fishing for abalone north of Moore River (Zone 8 of the managed fishery) has occurred since 2011–2012 (Strain <i>et al.</i>, 2018).</p> <p>Active licences/vessels: 26 vessels active in Roe's abalone fishery (WAFIC⁵).</p>
West Coast Deep Sea Crustacean Managed Fishery	✓	✓	✓	<p>Management area The West Coast Deep Sea Crustacean Managed Fishery extends north from Cape Leeuwin to the WANT border in water depths greater than 150 m within the AFZ.</p>
				<p>Species targeted</p> <p>The fishery targets deepwater crustaceans. Catches were dominated by crystal crabs of which 99% of their Total Allowable Catch (TAC) was landed (How and Orme, 2020a). Crystal (snow) crab (<i>Chaceon albus</i>) Giant (king) crab (<i>Pseudocarcinus gigas</i>) Champagne (spiny) crabs (<i>Hypothalassia acerba</i>)</p>
				<p>Fishing methods Baited pots, or traps, are operated in long-lines which have between 80 and 180 pots attached to a main line marked by a float at each end.</p> <p>Fishing depth Deeper than 150 m (and mostly at depths of between 500 m – 800 m). Most of the commercial Crystal crab catch is taken in depths of 500 m – 800 m (WAFIC⁶).</p>
				<p>Fishing effort: The total landings in 2018 was 168. t. Two vessels operated in the fishery in 2017, using baited pots operated in a longline formation in the shelf edge waters, mostly in depths between 500 and 800 m (How and Orme, 2020a). Fishing effort was concentrated between Fremantle and Carnarvon.</p>
				<p>Active licences/vessels: There were four active vessels in 2018 (How and Orme, 2020a).</p>

⁵ <https://www.wafic.org.au/fishery/roes-abalone-fishery/>

⁶ <https://www.wafic.org.au/fishery/west-coast-deep-sea-crustacean-fishery/>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
Aberlhos Islands and Mid-West Trawl Fishery	✓			<p>The Aberlhos Islands and Mid-West Trawl Fishery (AIMWTFM) operates around the Aberlhos Islands within the SWMR.</p> <p>Management area</p> <p>The Aberlhos Islands and Mid-West Trawl Fishery (AIMWTFM) operates around the Aberlhos Islands within the SWMR.</p> <p>Species targeted</p> <p>Saucer scallops (<i>Ylistrum balloti</i>, formerly <i>Amusium balloti</i>)</p> <p>Fishing methods</p> <p>Trawl.</p> <p>Fishing depth</p> <p>Information not available, however, the species occurs at depth of around 30-60 m and therefore fishing effort would likely be at these depths (Himmelman <i>et al.</i>, 2009).</p>
				<p>Fishing effort:</p> <p>The scallop landings in the AIMWTFM were 31.0 t meat weight (154.8 t whole weight). Between 2011 and 2015, the annual pre-season surveys showed very low recruitment (1-year old), as a result of the 2011 extreme marine heatwave and subsequent poor spawning stock (Kangas <i>et al.</i>, 2020b). The fishery was closed between 2011 and 2016.</p> <p>Active licences/vessels:</p> <p>Information about licences or vessels is not available but the Department of Primary Industry and Regional Development reported 774 t of catch from this fishery in the 2019 annual report (DPIRD, 2019).</p> <p>Management area</p> <p>The Broome Prawn Managed Fishery (BPMF) operates off Broome and forms part of the North Coast Prawn Fishery.</p>
Broome Prawn Managed Fishery	✓			<p>Species targeted</p> <p>Western king prawn (<i>Penaeus latisulcatus</i>) Coral prawn</p> <p>Fishing effort:</p> <p>BPMF recorded extremely low fishing effort in 2018. Only two vessels undertook trial fishing to investigate whether the catch rates were sufficient for commercial fishing. This resulted in negligible landings of Western king prawn (Kangas <i>et al.</i>, 2020a).</p> <p>Fishing methods</p> <p>Trawl.</p> <p>Fishing depth</p> <p>Trawling is generally in waters between 30 and 60 m deep, however can occur down to 100 m (DOEH, 2004).</p>

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Fishery	Woodside Activity Area			Description																					
	Browse	NWS/S	NW Cape																						
				<p>Active licences/vessels: Two vessels conducting fishing trial operated in 2018 (Kangas <i>et al.</i>, 2020a).</p> <p>Management area The estimated employment in the fishery in 2017 was 18 people including skippers and other crew (Kangas <i>et al.</i>, 2018). The fishery occupies a total area of 4000 km², with only half of this area being trawled (Fletcher and Santoro, 2015).</p> <p>Species targeted</p> <table border="1"> <thead> <tr> <th>Species targeted</th> <th>Fishing methods</th> <th>Fishing depth</th> </tr> </thead> <tbody> <tr> <td>Western king prawn (<i>Penaeus latisulcatus</i>)</td> <td>Trawl.</td> <td>Information not available.</td> </tr> <tr> <td>Brown tiger prawn (<i>Penaeus esculentus</i>)</td> <td></td> <td></td> </tr> <tr> <td>Blue endeavour prawn (<i>Metapenaeus endeavouri</i>)</td> <td></td> <td></td> </tr> <tr> <td>Banana prawn (<i>Penaeus merguianensis</i>)</td> <td></td> <td></td> </tr> </tbody> </table> <p>Fishing effort: The total landings of prawns in 2018 were 880 t (Kangas <i>et al.</i>, 2020a). In the 2016 season, a fishing effort of about 23,000 hours resulted in a catch of 822 t.</p> <p>Active licences/vessels: The precise number of vessels is unreported. Eighteen people were said to be employed in this fishery in 2018 (Kangas <i>et al.</i>, 2019); however, in 2013 it was reported that 18 skippers as well as other crew and support staff were employed (WAFIC⁷).</p> <p>Management area The Gascoyne Demersal Scalefish Fishery (GDSF) is located between the southern Ningaloo Coast to south of Shark Bay (23°07.30'S to 26° 30'S) with a closure area at Point Maud to Tantabiddi (21°56.30'S) (WAFIC⁸).</p> <p>Species targeted</p> <table border="1"> <thead> <tr> <th>Species targeted</th> <th>Fishing methods</th> <th>Fishing depth</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Species targeted	Fishing methods	Fishing depth	Western king prawn (<i>Penaeus latisulcatus</i>)	Trawl.	Information not available.	Brown tiger prawn (<i>Penaeus esculentus</i>)			Blue endeavour prawn (<i>Metapenaeus endeavouri</i>)			Banana prawn (<i>Penaeus merguianensis</i>)			Species targeted	Fishing methods	Fishing depth			
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Banana prawn (<i>Penaeus merguianensis</i>)																									
Species targeted	Fishing methods	Fishing depth																							
Exmouth Gulf Prawn Managed Fishery	✓																								
Gascoyne Demersal Scalefish Managed Fishery		✓																							

⁷ <https://www.wafic.org.au/fishery/exmouth-gulf-prawn-fishery/>

⁸ <https://www.wafic.org.au/fishery/gascoyne-demersal-scalefish-fishery/>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Pink snapper (<i>Chrysophrys auratus</i>) Goldband snapper (<i>Pristipomoides multidentis</i>) Red emperor (<i>Lutjanus sebae</i>) Cods (<i>Gadus morhua</i>) Emperors (<i>Lethrinus miniatus</i>)</p> <p>Mechanised handlines.</p> <p>Information not available.</p>
				<p>Fishing effort: The GDSF reported a total commercial catch of 210 t in 2017-18.</p>
				<p>Active licences/vessels: In 2018, 13 vessels fished during the season, in the 2017 season there were 16 vessels (Gaughan and Santoro, 2018).</p>
				<p>Management area The Kimberley Developing Mud Crab Fishery is one of two small trap-based crab fisheries that exist in the North Coast Bioregion between Cambridge Gulf and Broome (Gaughan and Santoro, 2018).</p>
				<p>Species targeted</p>
				<p>Brown mud crab (<i>Scylla olivacea</i>) Green mud crab (<i>Scylla serrata</i>)</p> <p>Trap.</p> <p>Information not available.</p>
				<p>Fishing effort: The catch landed represents all commercially caught mud crabs landed in WA for 2018. A nominal catch rate of 0.66 kg/traplift was recorded for 2018, which is a 28% decrease from 2017 but remains above the harvest strategy threshold (Johnston <i>et al.</i>, 2020).</p>
				<p>Active licences/vessels: There are currently three licences issued to commercial operators (600 trap limit), and three exemptions issued to Indigenous groups (total of 210 traps currently allocated of a maximum 600 traps) (Johnston <i>et al.</i>, 2020).</p>
				<p>Management area The Nickol Bay Prawn Managed Fishery operates in nearshore and offshore waters of the Pilbara region along the NWS.</p>
				<p>Species targeted</p>
				<p>Fishing methods</p>
				<p>Fishing depth</p>
Nickol Bay Prawn Managed Fishery		✓		<p>The Nickol Bay Prawn Managed Fishery operates in nearshore and offshore waters of the Pilbara region along the NWS.</p>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Banana prawn (<i>Penaeus merguianus</i>) Western king prawn (<i>Penaeus latisulcatus</i>) Brown tiger prawn (<i>Penaeus esculentus</i>) Blue endeavour prawn (<i>Metapenaeus endeavouri</i>)</p> <p>Fishing effort: Trawling has been reported to occur at several locations along the Pilbara coast to the east of the Burrup Peninsula, including within the waters of Nickol Bay (Fletcher and Santoro, 2015). The total landings for the 2018 season were 81 t. Fishing effort was less than half at 138 days, compared to 281 boat days in 2017 (Kangas <i>et al.</i>, 2020a).</p> <p>Active licences/vessels: The precise number of vessels is unreported, though low effort produced a catch of 17 t in 2016 (Kangas <i>et al.</i>, 2018).</p> <p>Management area The fishery is divided into two fishing areas: an inshore sector (Area 1) and an offshore sector (Area 2) (Newman <i>et al.</i>, 2018). Area 1 permits line fishing only, between the high water mark and the 30 m isobath. Area 2 permits handline, dropline and fish trap fishing methods and is further divided into zones. Zone A is an inshore area, Zone B comprises the area with most historical fishing activity, and Zone C is an offshore deep slope area representing waters deeper than 200 m (Fletcher <i>et al.</i>, 2017).</p> <p>Species targeted</p> <p>Fishing methods Line fishing, handline, dropline and fish trap fishing.</p> <p>Fishing depth Information not available.</p>
Northern Demersal Scalefish Managed Fishery	✓			

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Fishing effort: In 2018, the fishery reported a total catch of 1297 t. Most of the catch is landed from Zone B, with a catch of 1106 t in 2018. The level of catch in Zone B is the highest reported since zoning was implemented in 2006 (Newman <i>et al.</i>, 2019).</p> <p>Active licences/vessels: Six vessels fished in the 2018 season and at least 20 people were directly employed (Gaughan and Santoro, 2018).</p> <p>Management area The developing Octopus Fishery operates from Kalbarri Cliffs in the north to Esperance in the south.</p>
Octopus Interim Management Fishery				<p>Species targeted</p>
				<p><i>Octopus sp. cf. tetricus</i></p> <p>Fishing methods Passive shelter pots and active traps.</p> <p>Fishing depth In inshore waters to a depth of 70 m (DPIRD, 2018).</p>
				<p>Fishing effort: In 2019, the total commercial octopus catch was 314 t, which was 22% higher than the 2017 catch of 257 t. In 2016, about 200 vessels reported a total catch of 252 t (Hart <i>et al.</i>, 2020c).</p>
				<p>Active licences/vessels: About 21 vessels fish within the octopus specific fisheries, and about 200 vessels from the West Coast Rock Lobster Fishery catch octopus as bycatch (Gaughan and Santoro, 2018).</p>
Shark Bay Beach Seine and Mesh Net Managed Fishery				<p>Management area The Shark Bay Beach Seine and Mesh Net Managed Fishery operates from Denham.</p>
				<p>Species targeted</p>
				<p>Whiting (yellowfin <i>Sillago schomburgkii</i> and goldenline <i>S. analis</i>) Sea mullet (<i>Mugil cephalus</i>) Tailor (<i>Pomatomus saltatrix</i>) Western yellowfin bream (<i>Acanthopagrus australis</i>)</p> <p>Fishing methods Beach seine and mesh net.</p> <p>Fishing depth Information not available.</p>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Fishing effort: In 2018, the total catch was 176 t (Gaughan and Santoro, 2020). The fishery currently employs about 14 fishers based on the seven fishery licences in operation (WAFIC⁹).</p> <p>Active licences/vessels: Six vessels operated employing around 12 fishers (Gaughan and Santoro, 2018).</p> <p>Management area The Shark Bay Crab Managed Fishery operates within the NWMR.</p> <p>Species targeted</p> <p>Blue swimmer crab (<i>Portunus armatus</i>)</p> <p>Fishing methods Trap and trawl.</p> <p>Fishing depth Information not available.</p>
Shark Bay Prawn and Scallop Managed Fishery				<p>Fishing effort: Commercial fishing for blue swimmer crabs in Shark Bay was voluntarily halted by industry in 2012 to facilitate stock rebuilding. The stock is still in a recovery phase; however, the fishery has resumed and reported a total commercial catch of 518 t in the 2017/18 season. The average commercial trap catch rate was 1.5 kg/traplift during 2017/18 (Chandrapavan <i>et al.</i>, 2017).</p> <p>Active licences/vessels: The precise number of vessels in the Shark Bay Blue Swimmer Crab Fishery is unreported. There are five crab trap permits. These permits are consolidated onto three active vessels (WAFIC¹⁰).</p> <p>Management area The Shark Bay Prawn Managed Fishery is the highest producing WA fishery for prawns.</p> <p>Species targeted</p> <p>Western king prawn (<i>Penaeus latisulcatus</i>)</p> <p>Brown tiger prawn (<i>Penaeus esculentus</i>)</p> <p>Fishing methods Low-opening otter trawls.</p> <p>Fishing depth Information not available.</p>

⁹ <https://www.wafic.org.au/fishery/inner-shark-bay-scallofish-fishery/>

¹⁰ <https://www.wafic.org.au/fishery/shark-bay-prawn-and-scallop-managed-fisheries/>

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Endeavour prawns (<i>Metapenaeus endeavouri</i>)</p> <p>Coral prawns (<i>Metapenaeopsis</i> sp.)</p> <p>Saucer scallop (<i>Amusium balloti</i>)</p> <p>Fishing effort: The Shark Bay Scallop Managed Fishery is currently in a recovery phase due to the results from the pre-season survey of stock abundance (Fletcher and Santoro, 2015; Kangas <i>et al.</i>, 2018).</p> <p>Active licences/vessels: The precise number of vessels in the Shark Bay Prawn Managed Fishery is unreported, however, about 100 people are employed in this fishery (Gaughan and Santoro, 2018). About 20 skippers and crew are employed in scallop fishing in the Shark Bay and South Coast fisheries across 18 vessels in 2015 (Sporer <i>et al.</i>, 2015).</p> <p>Management area The South Coast Crustacean Managed Fishery comprises four fisheries: the Windy Harbour/Augusta Rock Lobster Managed Fishery, the Esperance Rock Lobster Managed Fishery, the Southern Rock Lobster Pot Regulation Fishery and the South Coast Deep-Sea Crab Fishery.</p>
South Coast Crustacean Managed Fishery	-	-	-	<p>Species targeted</p> <p>Southern rock lobster (<i>Jasus edwardsii</i>)</p> <p>Western rock lobster (<i>Panulirus cygnus</i>)</p> <p>Giant crab (<i>Pseudocarcinus gigas</i>)</p> <p>Crystal crab (<i>Chaceon albus</i>)</p> <p>Champagne crab (<i>Hypothalassia acerba</i>)</p> <p>Fishing effort: The South Coast Crustacean Managed Fishery reported a total catch of 101.2 t in 2018 season and the value of the fishery for 2017/2018 was about \$5.9 million (Howe and Orme, 2020b).</p> <p>Active licences/vessels: The number of vessels is unknown; however, a total of 1977 pots are licensed to be used.</p> <p>Management area The fishery is active in coastal waters between Cape Leeuwin and the South Australia border. Landings are primarily at Albany, Bremer Bay and Esperance (Norriss and Blazeski, 2020).</p>

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Fishery	Woodside Activity Area			Description		
	Browse	NWS/S	NW Cape	Species targeted	Fishing methods	Fishing depth
South Coast Purse Seine Managed Fishery				Small pelagic finfish such as pilchards and yellowtail scad using purse seine nets from vessels. Sandy sprat (<i>Hyperlophus vittatus</i>) Blue sprat (<i>Spratelloides robustus</i>)	Purse seine.	Information not available.
				Fishing effort: In the 2017/18 season the total catch effort was 2,168 t (Norriss and Blazeski, 2020).		
				Active licences/vessels: Nine active vessels in 2017/18 (Norriss and Blazeski, 2020).		
South-west Trawl Managed Fishery	-	-	-	The South-west Trawl Managed Fishery is a multi-species fishery and includes two of WA's smaller scallop fishing grounds at Fremantle and north of Geographe Bay (Fairclough and Walters, 2018).		
				Species targeted	Fishing methods	Fishing depth
				Scallops (<i>Ylistrum balloti</i> , formerly <i>Amusium balloti</i>) and associated by-products Western king prawn (<i>Penaeus latiuscatus</i>) In years of low scallop catches licencees may use other trawl gear to target fin-fish species.	Trawl.	Information not available.
				Fishing effort: Effort in the fishery is highly variable and typically fluctuates in response to recruitment variability in saucer scallops and prawns. The fishery was not active in 2015 or 2016 (Fairclough and Walters, 2018).		
				Active licences/vessels: Only one boat fished in 2018 for a total of 5 boat days for minimal catch (Fairclough and Walters, 2018).		

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Fishery	Woodside Activity Area			Description												
	Browse	NWS/S	NW Cape													
The South Coast Salmon Managed Fishery	-	-	-	<p>The South Coast Salmon Managed Fishery is one of two fisheries operating in the South Coast Bioregion that target nearshore and estuarine finfish.</p> <table border="1"> <thead> <tr> <th>Species targeted</th> <th>Fishing methods</th> <th>Fishing depth</th> </tr> </thead> <tbody> <tr> <td>Western Australian salmon (<i>Arripis truttaceus</i>) Southern school whiting (<i>Sillago bassensis</i>) Australian herring (<i>Arripis georgianus</i>) King George whiting (<i>Sillaginodes punctatus</i>) Sea mullet (<i>Mugil cephalus</i>) Estuary cobbler (<i>Cnidogobius macrocephalus</i>) Black bream (<i>Acanthopagrus butcheri</i>)</td> <td>Beach seines, haul nets and gill nets.</td> <td>Information not available.</td> </tr> </tbody> </table> <p>Fishing effort: The total catch for 2018 was 243 t (Duffy and Blay, 2020b).</p> <p>Active licences/vessels: Number of vessels is unknown; however, 12 commercial fishers were employed in 2018 (Duffy and Blay, 2020b).</p> <p>Management area Primarily active in the Bunbury areas in the SWMR.</p> <table border="1"> <thead> <tr> <th>Species targeted</th> <th>Fishing methods</th> <th>Fishing depth</th> </tr> </thead> <tbody> <tr> <td>Whitebait</td> <td>Beach-based haul nets.</td> <td>Information not available.</td> </tr> </tbody> </table> <p>Fishing effort: In recent years the fishery is primarily active in the Bunbury area. Total catch of whitebait in 2015 was 40.2 t (Duffy and Blay, 2020c).</p>	Species targeted	Fishing methods	Fishing depth	Western Australian salmon (<i>Arripis truttaceus</i>) Southern school whiting (<i>Sillago bassensis</i>) Australian herring (<i>Arripis georgianus</i>) King George whiting (<i>Sillaginodes punctatus</i>) Sea mullet (<i>Mugil cephalus</i>) Estuary cobbler (<i>Cnidogobius macrocephalus</i>) Black bream (<i>Acanthopagrus butcheri</i>)	Beach seines, haul nets and gill nets.	Information not available.	Species targeted	Fishing methods	Fishing depth	Whitebait	Beach-based haul nets.	Information not available.
Species targeted	Fishing methods	Fishing depth														
Western Australian salmon (<i>Arripis truttaceus</i>) Southern school whiting (<i>Sillago bassensis</i>) Australian herring (<i>Arripis georgianus</i>) King George whiting (<i>Sillaginodes punctatus</i>) Sea mullet (<i>Mugil cephalus</i>) Estuary cobbler (<i>Cnidogobius macrocephalus</i>) Black bream (<i>Acanthopagrus butcheri</i>)	Beach seines, haul nets and gill nets.	Information not available.														
Species targeted	Fishing methods	Fishing depth														
Whitebait	Beach-based haul nets.	Information not available.														
West Coast Beach Bait Managed Fishery	-	-	-													

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Fishery	Woodside Activity Area			Description
	Browse	NWS/S	NW Cape	
				<p>Active licences/vessels:</p> <p>Number of vessels is unknown; however, only one license was issued (DPIRD, 2019).</p>
West Coast Demersal Gillnet and Demersal Longline (Interim) Managed Fishery	-	-	-	<p>Management area</p> <p>The West Coast Demersal Gillnet and Demersal Longline (Interim) Managed Fishery (WCDGDLF) is part of the Temperate Demersal Gillnet and Demersal Longline Fishery (TDGDLF), which operates between 26° and 33° S, and the Joint Authority Southern Demersal Gillnet and Demersal Longline Managed Fishery (JASDGDLF), which operates from 33° S to the W/SA border (Braccini and Blay, 2020).</p>
				<p>Species targeted</p> <p>Fishing methods</p> <p>Gillnet and longline.</p> <p>Fishing depth</p> <p>Information not available.</p>
				<p>Gummy shark (<i>Mustelus antarcticus</i>)</p> <p>Dusky shark (<i>Carcharhinus obscurus</i>)</p> <p>Whiskery shark (<i>Furgaleus macki</i>)</p> <p>Sandbar shark (<i>C. plumbeus</i>)</p>
				<p>Fishing effort:</p> <p>Catch estimated annual value of the fishery was \$0.2 million for 2017 to 2018 (Braccini and Blay, 2020).</p>
				<p>Active licences/vessels:</p> <p>Vessel numbers are unknown; however, 17 interim managed fishery permits were held in 2019 (DPIRD, 2019) and between 18 and 21 skippers and crew were employed between 2016 and 2017.</p>
West Coast Demersal Scalefish Fishery	-	-	-	<p>Management area</p> <p>These fisheries include the West Coast Demersal Scalefish (Interim) Managed Fishery (51 boats), the West Coast Demersal Gillnet and Demersal Longline (Interim) Managed Fishery and the temperate Demersal Gillnet and Demersal Longline Fisheries. The West Coast Demersal Scalefish Managed Fishery is the main commercial fishery that targets demersal species in the West Coast Bioregion. It encompasses the waters from just south of Shark Bay down to just east of Augusta and extends seaward to the 200 nm boundary. The fishery is divided into four inshore management areas and one offshore management area.</p>
				<p>Species targeted</p> <p>Fishing methods</p> <p>Lines.</p> <p>Fishing depth</p> <p>Inshore species – 20 to 250 m water depth.</p>
				<p>Baldchin groper (<i>Choerodon rubescens</i>)</p> <p>Dhufish (<i>Glucosoma hebraicum</i>)</p> <p>Pink snapper (<i>Pagrus auratus</i>)</p>

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Fishery	Woodside Activity Area			Description
	Browse	NMS/S	NW Cape	
				Offshore species – more than 250 m water depth.
				Fishing effort: In 2016, the West Coast Demersal Scafish (interim) Managed Fishery reported a total catch of 256 t.
				Active licences/vessels: The precise number of vessels in the West Coast Demersal Scafish Fisheries is unreported; however, it is restricted to 60 interim managed fishery permit holders.
West Coast Purse Seine Managed Fishery	-	-	-	Management area Located in waters from Cape Bouvard extending to Lancelin.
				Species targeted
				Small pelagic finfish such as: Scaly mackerel (<i>Sardinella lemuru</i>) Pilchards (<i>Sardinops sagax</i>) Australian anchovy (<i>Engraulis australis</i>) Yellowtail scad (<i>Trachurus novaezelandiae</i>) Maray (<i>Etrumeus teres</i>)
				Fishing methods Purse seine.
				Fishing depth Information not available.
				Fishing effort: Information not available
				Active licences/vessels: Seven vessels in 2017 (Gaughan and Santoro, 2018).
West Coast Rock Lobster Managed Fishery			✓	Management area The West Coast Rock Lobster Fishery operates from Shark Bay south to Cape Leeuwin. The fishery is managed using zones, seasons and total allowable catch. The recreational fishery targets the western rock lobsters using baited pots and by diving between North-west Cape and Augusta.

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Fishery	Woodside Activity Area			Description												
	Browse	NWS/S	NW Cape													
				<table border="1"> <thead> <tr> <th>Species targeted</th> <th>Fishing methods</th> <th>Fishing depth</th> </tr> </thead> <tbody> <tr> <td>Western rock lobster (<i>Panulirus cygnus</i>)</td> <td>Baited pots.</td> <td>Less than 20 m.</td> </tr> <tr> <td>Fishing effort:</td> <td colspan="2">In 2018, 234 vessels reported a total catch of 6400 t in 2017 (de Lestang <i>et al.</i>, 2018). In 2016, 226 vessels reported a total catch of 6,086 t (Gaughan and Santoro, 2018).</td> </tr> <tr> <td>Active licences/vessels:</td> <td colspan="2">234 vessels operated in 2017 and 233 vessels operated in 2018 (Gaughan and Santoro, 2018).</td> </tr> </tbody> </table>	Species targeted	Fishing methods	Fishing depth	Western rock lobster (<i>Panulirus cygnus</i>)	Baited pots.	Less than 20 m.	Fishing effort:	In 2018, 234 vessels reported a total catch of 6400 t in 2017 (de Lestang <i>et al.</i> , 2018). In 2016, 226 vessels reported a total catch of 6,086 t (Gaughan and Santoro, 2018).		Active licences/vessels:	234 vessels operated in 2017 and 233 vessels operated in 2018 (Gaughan and Santoro, 2018).	
Species targeted	Fishing methods	Fishing depth														
Western rock lobster (<i>Panulirus cygnus</i>)	Baited pots.	Less than 20 m.														
Fishing effort:	In 2018, 234 vessels reported a total catch of 6400 t in 2017 (de Lestang <i>et al.</i> , 2018). In 2016, 226 vessels reported a total catch of 6,086 t (Gaughan and Santoro, 2018).															
Active licences/vessels:	234 vessels operated in 2017 and 233 vessels operated in 2018 (Gaughan and Santoro, 2018).															

11.5.2 Aquaculture

Aquaculture operations in the northwest are typically restricted to inland and shallow coastal waters.

West Coast Bioregion

Aquaculture activities in the West Coast bioregion, defined by the Department of Primary Industries and Regional Development (DPIRD) (as the government body responsible management of primary industries in WA) are focused on blue mussels and edible oysters (mainly in Cockburn Sound) and marine algae for production of beta-carotene, used as a food additive and as a nutritional supplement. Offshore marine finfish production is also being developed, initially focusing on yellowtail kingfish.

There is also an emerging black pearl industry (from the *Pinctada margaritifera* oyster) in the Abrolhos Islands. As well as expansion in the production of Akoya pearls (small white pearls from *Pinctada fucata martensi*), *Pinctada albina* (small, yellow pearls) and *Pteria penguin*, which are often used to produce half (mabe) pearls in pink and bluish shades.

Aquaculture licences for producing coral and live rock (pieces of old coral reefs colonised by marine life, such as beneficial bacteria, for aquariums) at the Abrolhos Islands have also been issued and other applications are being assessed.

Gascoyne Coast Bioregion

In the Gascoyne Coast bioregion, aquaculture activities are focused on the blacklip oyster (*Pinctada margaritifera*) and Akoya pearl oyster (*Pinctada imbricata*) (Gaughan and Santoro, 2020). Several hatcheries supply *P. margaritifera* juveniles to the region's developing black pearl farms.

Other aquaculture developments in the Gascoyne Coast bioregion include emerging producers of coral and live rock species for aquariums.

North Coast Bioregion

Aquaculture activities in the North Coast bioregion is dominated by the production of pearls. A large number of pearl oysters for seeding are obtained from wild stocks and supplemented by hatchery produced oysters, with major hatcheries operating at Broome and around the Dampier Peninsula (Gaughan and Santoro, 2018). Primary spawning of the pearl oyster occurs from mid-October to December. A smaller secondary spawning occurs in February and March (Gaughan and Santoro, 2020).

Other aquaculture developments in the North Coast include emerging producers of coral and live rock species for aquariums as well as barramundi (*Lates calcarifer*) farms and microalgae culturing for Omega-3, biofuels and protein biomass (Gaughan and Santoro, 2020).

11.6 Fisheries – Traditional

Traditional or customary fisheries are typically restricted to shallow coastal waters and/or areas with structures such as reef.

Dugong, fish and marine turtles that move between coastal and Commonwealth waters are important components of the Aboriginal people's culture and diet. Aboriginal people continue to actively manage their sea country in coastal waters of WA in order to protect and manage the marine environment, its resources and cultural values.

Indonesian fishers can fish within designated areas under the Australia-Indonesia Memorandum of Understanding regarding the Operations of Indonesian Traditional Fishermen in Areas of the Australian Fishing Zone and Continental Shelf – 1974 (MoU 74). Traditional fishing is allowed within the MoU Box (**Figure 11-1**), which encompasses: Ashmore Reef (Pulau Pasir), Cartier Island (Pulau Baru), Seringapatam Reef (Afringan), Scott Reef (Pulau Dato) and Browse Island (Berselan). Restrictions have since been introduced around Ashmore Reef and Cartier Island following their

designation as Nature Reserves under the Commonwealth's *National Parks and Wildlife Conservation Act 1975* in 1983 and 2000, respectively.

The MoU allows Indonesian fishers to fish in designated areas using traditional methods only. These methods include reef gleaning, free-diving, hand lining and other non-mechanised methods. Scott Reef is currently the principal reef in the MoU 74 Box and is utilised seasonally by Indonesian fishers to harvest trepang, trochus shells and other reef species. The peak season is July to October due to more favourable wind conditions, and to allow fishers to sun dry their catch on their boat decks (ERM, 2009). Browse Island is also frequently visited by shark fishers who mostly fish along the eastern margin of the MoU 74 Box.

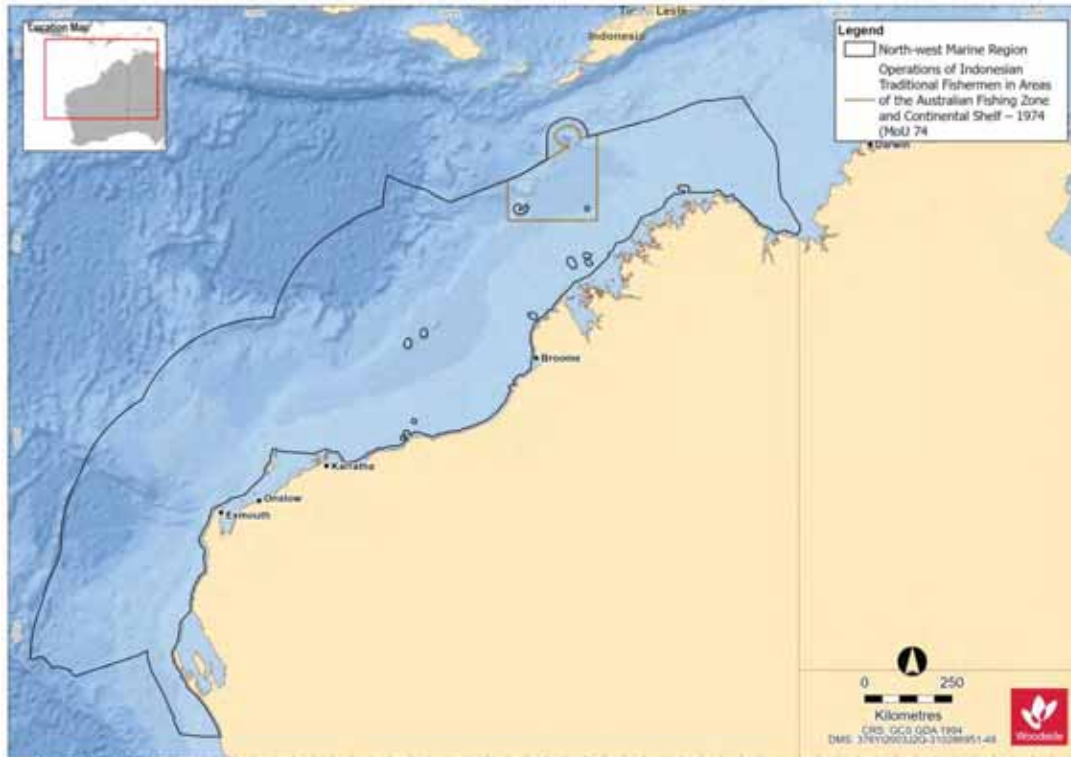


Figure 11-1 MOU 74 Box. Operations of Indonesian Traditional Fishermen in Areas of the Australian Fishing Zone and Continental Shelf – 1974

11.7 Tourism and Recreation

There are growing tourism and recreational sectors in WA. The Kimberley, Pilbara and Gascoyne regions are popular visitor destinations for Australian and international tourists. Tourism is concentrated in the vicinity of population centres including Broome, Dampier, Exmouth, Coral Bay and Shark Bay.

Recreational and tourism activities include: charter fishing, other recreational fishing, diving, snorkelling, marine fauna watching, and yachting.

11.7.1 Gascoyne Region

Outside the petroleum industry, tourism is the largest revenue earner of all the major industries of the Gascoyne region. It contributes significantly to the local economy in terms of both income and

employment. In 2018 there was an average of 337,400 visitors with a visitor spend of \$359 million (Gascoyne Development Commission¹¹).

In 2018-19, the Ningaloo region (Ningaloo Reef and the surrounding coastal region Exmouth Gulf, communities of Exmouth and Coral Bay, and adjacent proposed southern coastal reserves and pastoral leases) contributed an estimated \$110 million in value added to the WA economy (DCBA, 2020). Ningaloo's economic contribution to WA is attributed to four key types of economic activity, tourism expenditure by international, interstate and WA visitors to the Ningaloo region, commercial fishing in the Exmouth Gulf, recreation activity involving the Reef by residents of the Ningaloo region and management and research relating to the Reef (DCBA, 2020). More than 90% of this value added is attributed to the domestic and international tourists who visit Ningaloo each year (DCBA, 2020). The main marine nature-based tourist activities are concentrated around and within the Ningaloo WHA.

11.7.2 Pilbara region

Recreation and tourism activities within the Pilbara are of high social value. Tourism is a key economic driver for the Pilbara with more than 1 million visitors to the region every year, generating \$413 million in gross revenue annually (Pilbara Development Commission¹²).

Recreational fishing within the Pilbara region tends to be concentrated in State waters adjacent to population centres. Recreational fishing is known to occur around the Dampier Archipelago with boats launched from boat ramps around Dampier and Karratha (Williamson *et al.*, 2006). Once at sea, charter vessels may also frequent the waters surrounding the Montebello Islands.

11.7.3 Kimberley Region

Recreation and tourism activities in the Kimberley region occur predominantly in WA State waters (extending offshore 3 nm from the mainland), adjacent to coastal population centres (e.g. Broome), with a peak in activity during the winter months (dry season). These activities include recreational fishing, diving, snorkelling, wildlife watching and boating.

Primary dive locations in the Kimberley region include the Rowley Shoals, including Mermaid Reef AMP, Scott Reef, Seringapatam Reef, Ashmore Reef AMP and Cartier Island.

11.8 Shipping

Commercial shipping traffic is high within the NWMR with vessel activities including commercial fisheries, tourism such as cruises, international shipping and oil and gas operations. There are 12 ports adjacent to the NWMR, including the major ports of Dampier, Port Hedland and Broome, which are operated by their respective port authorities. These ports handle large tonnages of iron ore and petroleum exports in addition to salt, manganese, feldspar chromite and copper (DEWHA, 2008).

Heavy vessel traffic exists within the Pilbara Port Authority management area which recorded 10,064 vessel movements in Port of Dampier 2019/20 annual reporting period (PPA, 2020). Twenty-six designated anchorages for bulk carriers, petroleum and gas tankers, drilling rigs, offshore platforms, and pipelay vessels are located offshore of Rosemary Island.

In 2012, AMSA established a network of shipping fairways off the northwest coast of Australia. The shipping fairways, while not mandatory, aim to reduce the risk of collision between transiting vessels and offshore infrastructure. The fairways are intended to direct large vessels such as bulk carriers and LNG ships trading to the major ports into pre-defined routes to keep them clear of existing and planned offshore infrastructure (AMSA, 2013).

¹¹ <https://www.gdc.wa.gov.au/industry-profiles/tourism/>

¹² <https://www.pdc.wa.gov.au/our-focus/strategicinitiatives/tourism>

11.9 Oil and Gas Infrastructure

The NWMR supports a number of industries including petroleum exploration and production.

Within the NWMR there are seven sedimentary petroleum basins: Northern and Southern Carnarvon basins, Perth, Browse, Roebuck, Offshore Canning and Bonaparte basins. Of these, the Northern Carnarvon, Browse and Bonaparte basins hold large quantities of gas and comprise most of Australia's reserves of natural gas (DEWHA, 2008), which is reflected by the level of development in the area. In addition to existing facilities, there are proposed developments in the region. This includes proposals to develop gas and condensate from a number of fields within the NWMR.

In addition to the oil and gas industry, other land-based industries depend upon the marine environment in the nearshore area. These include ports, salt mines such as Karratha and Onslow, LNG onshore processing facilities such as Burrup Hub, Thevenard Island, Barrow Island, Varanus Island, and small-scale desalination plants at Barrow Island, Burrup, Cape Preston, and Onslow.

11.10 Defence

Key Australian Department of Defence (DoD) operational areas and facilities areas of the NWMR for training and operational activities, include:

- An operating logistics base has been established in Dampier to support vessels patrolling the waters around offshore oil and gas facilities. A dedicated navy administrative support facility is also being constructed at the nearby township of Karratha.
- The Royal Australian Air Force currently maintains two 'bare bases' in remote areas of WA that are used for military exercises. One of these is the Royal Australian Air Force Base in Learmonth. The Royal Australian Air Force maintains the Commonwealth Heritage listed Learmonth Air Weapons Range Facility, which is located between Ningaloo Station and the Cape Range National Park. The air training area associated with the Learmonth base extends over the offshore region.
- The Royal Australian Air Force Base Curtin is located on the north coast of WA, south-east of Derby and 170 km east of Broome. It provides support for land, air and sea operations aimed to support Australia's northern approaches.
- The Naval Communications Station Harold E. Holt is located ~6 km north of Exmouth. The main role of the station is to communicate at very low frequencies (19.8 kHz) with Australian and United States submarines and ships in the eastern Indian Ocean and the western Pacific Ocean.

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APPENDIX A. PROTECTED MATTER SEARCH REPORTS FOR NWMR, SWMR AND NMR



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected.

Information on the coverage of this report and qualifications on data supporting this report are contained in the caveat at the end of the report.

Information is available about [Environment Assessments](#) and the EPBC Act including significance guidelines, forms and application process details.

Report created: 10/05/21 12:59:15

[Summary](#)

[Details](#)

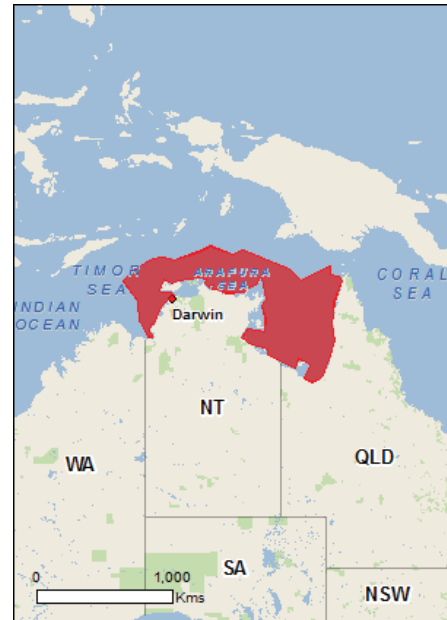
[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

[Acknowledgements](#)



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[Coordinates](#)

Buffer: 1.0Km



Summary

Matters of National Environmental Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	None
National Heritage Places:	None
Wetlands of International Importance:	None
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	2
Listed Threatened Ecological Communities:	None
Listed Threatened Species:	33
Listed Migratory Species:	70

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <http://www.environment.gov.au/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Land:	None
Commonwealth Heritage Places:	None
Listed Marine Species:	127
Whales and Other Cetaceans:	25
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	15

Extra Information

This part of the report provides information that may also be relevant to the area you have nominated.

State and Territory Reserves:	2
Regional Forest Agreements:	None
Invasive Species:	1
Nationally Important Wetlands:	1
Key Ecological Features (Marine)	8

Details

Matters of National Environmental Significance

Commonwealth Marine Area

[\[Resource Information \]](#)

Approval is required for a proposed activity that is located within the Commonwealth Marine Area which has, will have, or is likely to have a significant impact on the environment. Approval may be required for a proposed action taken outside the Commonwealth Marine Area but which has, may have or is likely to have a significant impact on the environment in the Commonwealth Marine Area. Generally the Commonwealth Marine Area stretches from three nautical miles to two hundred nautical miles from the coast.

Name

EEZ and Territorial Sea
Extended Continental Shelf

Marine Regions

[\[Resource Information \]](#)

If you are planning to undertake action in an area in or close to the Commonwealth Marine Area, and a marine bioregional plan has been prepared for the Commonwealth Marine Area in that area, the marine bioregional plan may inform your decision as to whether to refer your proposed action under the EPBC Act.

Name

[North](#)

Listed Threatened Species

[\[Resource Information \]](#)

Name	Status	Type of Presence
Birds		
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius mongolus Lesser Sand Plover, Mongolian Plover [879]	Endangered	Species or species habitat known to occur within area
Erythrotriorchis radiatus Red Goshawk [942]	Vulnerable	Species or species habitat likely to occur within area
Erythrura gouldiae Gouldian Finch [413]	Endangered	Species or species habitat may occur within area
Falcunculus frontatus whitei Crested Shrike-tit (northern), Northern Shrike-tit [26013]	Vulnerable	Species or species habitat likely to occur within area
Limosa lapponica baueri Nunivak Bar-tailed Godwit, Western Alaskan Bar-	Vulnerable	Species or species

Name	Status	Type of Presence
tailed Godwit [86380]	1079	habitat known to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat known to occur within area
Rostratula australis Australian Painted Snipe [77037]	Endangered	Species or species habitat may occur within area
Mammals		
Balaenoptera borealis Sei Whale [34]	Vulnerable	Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Species or species habitat likely to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Species or species habitat likely to occur within area
Macroderma gigas Ghost Bat [174]	Vulnerable	Species or species habitat likely to occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Species or species habitat likely to occur within area
Notomys aquilo Northern Hopping-mouse, Woorrentinta [123]	Endangered	Species or species habitat may occur within area
Saccolaimus saccolaimus nudicluniatus Bare-rumped Sheath-tailed Bat, Bare-rumped Sheath-tail Bat [66889]	Vulnerable	Species or species habitat may occur within area
Xeromys myoides Water Mouse, False Water Rat, Yirrkoo [66]	Vulnerable	Species or species habitat may occur within area
Reptiles		
Caretta caretta Loggerhead Turtle [1763]	Endangered	Foraging, feeding or related behaviour known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Breeding known to occur within area
Cryptoblepharus gurrmul Arafura Snake-eyed Skink [83106]	Endangered	Species or species habitat known to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Congregation or aggregation known to occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Breeding known to occur within area
Lepidochelys olivacea Olive Ridley Turtle, Pacific Ridley Turtle [1767]	Endangered	Breeding known to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Breeding known to occur within area
Sharks		
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat may occur within area

Name	Status	Type of Presence
Glyphis garricki Northern River Shark, New Guinea River Shark [82454]	Endangered	Species or species habitat known to occur within area
Glyphis glyphis Spear-tooth Shark [82453]	Critically Endangered	Species or species habitat may occur within area
Pristis clavata Dwarf Sawfish, Queensland Sawfish [68447]	Vulnerable	Species or species habitat known to occur within area
Pristis pristis Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish [60756]	Vulnerable	Species or species habitat known to occur within area
Pristis zijsron Green Sawfish, Dindagubba, Narrowsnout Sawfish [68442]	Vulnerable	Species or species habitat known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Species or species habitat may occur within area

Listed Migratory Species [Resource Information]

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Migratory Marine Birds		
Anous stolidus Common Noddy [825]		Foraging, feeding or related behaviour known to occur within area
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
Calonectris leucomelas Streaked Shearwater [1077]		Species or species habitat known to occur within area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat known to occur within area
Fregata minor Great Frigatebird, Greater Frigatebird [1013]		Species or species habitat known to occur within area
Sterna dougallii Roseate Tern [817]		Breeding known to occur within area
Sternula albifrons Little Tern [82849]		Species or species habitat may occur within area
Sula leucogaster Brown Booby [1022]		Breeding known to occur within area
Migratory Marine Species		
Anoxypristis cuspidata Narrow Sawfish, Knifetooth Sawfish [68448]		Species or species habitat known to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Species or species habitat likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Balaenoptera musculus	1081	
Blue Whale [36]	Endangered	Species or species habitat likely to occur within area
Balaenoptera physalus		
Fin Whale [37]	Vulnerable	Species or species habitat likely to occur within area
Carcharhinus longimanus		
Oceanic Whitetip Shark [84108]		Species or species habitat may occur within area
Carcharodon carcharias		
White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat may occur within area
Caretta caretta		
Loggerhead Turtle [1763]	Endangered	Foraging, feeding or related behaviour known to occur within area
Chelonia mydas		
Green Turtle [1765]	Vulnerable	Breeding known to occur within area
Crocodylus porosus		
Salt-water Crocodile, Estuarine Crocodile [1774]		Species or species habitat likely to occur within area
Dermochelys coriacea		
Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Congregation or aggregation known to occur within area
Dugong dugon		
Dugong [28]		Species or species habitat known to occur within area
Eretmochelys imbricata		
Hawksbill Turtle [1766]	Vulnerable	Breeding known to occur within area
Isurus oxyrinchus		
Shortfin Mako, Mako Shark [79073]		Species or species habitat likely to occur within area
Isurus paucus		
Longfin Mako [82947]		Species or species habitat likely to occur within area
Lepidochelys olivacea		
Olive Ridley Turtle, Pacific Ridley Turtle [1767]	Endangered	Breeding known to occur within area
Manta alfredi		
Reef Manta Ray, Coastal Manta Ray, Inshore Manta Ray, Prince Alfred's Ray, Resident Manta Ray [84994]		Species or species habitat likely to occur within area
Manta birostris		
Giant Manta Ray, Chevron Manta Ray, Pacific Manta Ray, Pelagic Manta Ray, Oceanic Manta Ray [84995]		Species or species habitat likely to occur within area
Megaptera novaeangliae		
Humpback Whale [38]	Vulnerable	Species or species habitat likely to occur within area
Natator depressus		
Flatback Turtle [59257]	Vulnerable	Breeding known to occur within area
Orcaella heinsohni		
Australian Snubfin Dolphin [81322]		Species or species habitat known to occur within area
Orcinus orca		
Killer Whale, Orca [46]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Physeter macrocephalus Sperm Whale [59]	1082	Species or species habitat may occur within area
Pristis clavata Dwarf Sawfish, Queensland Sawfish [68447]	Vulnerable	Species or species habitat known to occur within area
Pristis pristis Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish [60756]	Vulnerable	Species or species habitat known to occur within area
Pristis zijsron Green Sawfish, Dindagubba, Narrowsnout Sawfish [68442]	Vulnerable	Species or species habitat known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Species or species habitat may occur within area
Sousa chinensis Indo-Pacific Humpback Dolphin [50]		Breeding known to occur within area
Tursiops aduncus (Arafura/Timor Sea populations) Spotted Bottlenose Dolphin (Arafura/Timor Sea populations) [78900]		Species or species habitat known to occur within area
Migratory Terrestrial Species		
Cecropis daurica Red-rumped Swallow [80610]		Species or species habitat may occur within area
Cuculus optatus Oriental Cuckoo, Horsfield's Cuckoo [86651]		Species or species habitat may occur within area
Hirundo rustica Barn Swallow [662]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat may occur within area
Migratory Wetlands Species		
Acrocephalus orientalis Oriental Reed-Warbler [59570]		Species or species habitat may occur within area
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat known to occur within area
Arenaria interpres Ruddy Turnstone [872]		Species or species habitat known to occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat known to occur within area
Calidris alba Sanderling [875]		Species or species habitat likely to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area

Name	Threatened	Type of Presence
Calidris ferruginea Curlew Sandpiper [856]	1083 Critically Endangered	Species or species habitat known to occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area
Calidris ruficollis Red-necked Stint [860]		Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius mongolus Lesser Sand Plover, Mongolian Plover [879]	Endangered	Species or species habitat known to occur within area
Charadrius veredus Oriental Plover, Oriental Dotterel [882]		Species or species habitat may occur within area
Glareola maldivarum Oriental Pratincole [840]		Species or species habitat may occur within area
Limicola falcinellus Broad-billed Sandpiper [842]		Species or species habitat likely to occur within area
Limosa lapponica Bar-tailed Godwit [844]		Species or species habitat known to occur within area
Limosa limosa Black-tailed Godwit [845]		Species or species habitat known to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat known to occur within area
Numenius minutus Little Curlew, Little Whimbrel [848]		Species or species habitat known to occur within area
Numenius phaeopus Whimbrel [849]		Species or species habitat known to occur within area
Pandion haliaetus Osprey [952]		Species or species habitat known to occur within area
Pluvialis fulva Pacific Golden Plover [25545]		Species or species habitat known to occur within area
Pluvialis squatarola Grey Plover [865]		Species or species habitat known to occur within area
Thalasseus bergii Greater Crested Tern [83000]		Breeding likely to occur within area
Tringa brevipes Grey-tailed Tattler [851]		Species or species

Name	Threatened	Type of Presence
Tringa nebularia Common Greenshank, Greenshank [832]	1084	habitat known to occur within area Species or species habitat known to occur within area
Tringa stagnatilis Marsh Sandpiper, Little Greenshank [833]		Species or species habitat known to occur within area
Xenus cinereus Terek Sandpiper [59300]		Species or species habitat known to occur within area

Other Matters Protected by the EPBC Act

Listed Marine Species		[Resource Information]
* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.		
Name	Threatened	Type of Presence
Birds		
Acrocephalus orientalis Oriental Reed-Warbler [59570]		Species or species habitat may occur within area
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat known to occur within area
Anous stolidus Common Noddy [825]		Foraging, feeding or related behaviour known to occur within area
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
Arenaria interpres Ruddy Turnstone [872]		Species or species habitat known to occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat known to occur within area
Calidris alba Sanderling [875]		Species or species habitat likely to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Calidris ruficollis Red-necked Stint [860]	1085	Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Calonectris leucomelas Streaked Shearwater [1077]		Species or species habitat known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius mongolus Lesser Sand Plover, Mongolian Plover [879]	Endangered	Species or species habitat known to occur within area
Charadrius ruficapillus Red-capped Plover [881]		Species or species habitat known to occur within area
Charadrius veredus Oriental Plover, Oriental Dotterel [882]		Species or species habitat may occur within area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat known to occur within area
Fregata minor Great Frigatebird, Greater Frigatebird [1013]		Species or species habitat known to occur within area
Glareola maldivarum Oriental Pratincole [840]		Species or species habitat may occur within area
Haliaeetus leucogaster White-bellied Sea-Eagle [943]		Species or species habitat likely to occur within area
Heteroscelus brevipes Grey-tailed Tattler [59311]		Species or species habitat known to occur within area
Himantopus himantopus Pied Stilt, Black-winged Stilt [870]		Species or species habitat known to occur within area
Hirundo daurica Red-rumped Swallow [59480]		Species or species habitat may occur within area
Hirundo rustica Barn Swallow [662]		Species or species habitat may occur within area
Limicola falcinellus Broad-billed Sandpiper [842]		Species or species habitat likely to occur within area
Limosa lapponica Bar-tailed Godwit [844]		Species or species habitat known to occur within area
Limosa limosa Black-tailed Godwit [845]		Species or species habitat known to occur within area

Name	Threatened	Type of Presence
Motacilla cinerea Grey Wagtail [642]	1086	Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat known to occur within area
Numenius minutus Little Curlew, Little Whimbrel [848]		Species or species habitat known to occur within area
Numenius phaeopus Whimbrel [849]		Species or species habitat known to occur within area
Pandion haliaetus Osprey [952]		Species or species habitat known to occur within area
Pluvialis fulva Pacific Golden Plover [25545]		Species or species habitat known to occur within area
Pluvialis squatarola Grey Plover [865]		Species or species habitat known to occur within area
Recurvirostra novaehollandiae Red-necked Avocet [871]		Species or species habitat known to occur within area
Rostratula benghalensis (sensu lato) Painted Snipe [889]	Endangered*	Species or species habitat may occur within area
Sterna albifrons Little Tern [813]		Species or species habitat may occur within area
Sterna bengalensis Lesser Crested Tern [815]		Breeding known to occur within area
Sterna bergii Crested Tern [816]		Breeding likely to occur within area
Sterna dougalli Roseate Tern [817]		Breeding known to occur within area
Stiltia isabella Australian Pratincole [818]		Species or species habitat known to occur within area
Sula leucogaster Brown Booby [1022]		Breeding known to occur within area
Tringa nebularia Common Greenshank, Greenshank [832]		Species or species habitat known to occur within area
Tringa stagnatilis Marsh Sandpiper, Little Greenshank [833]		Species or species habitat known to occur within area
Xenus cinereus Terek Sandpiper [59300]		Species or species habitat known to occur within area

Name	Threatened	Type of Presence
Acentronura tentaculata	1087	
Shortpouch Pygmy Pipehorse [66187]		Species or species habitat may occur within area
Bhanotia fasciolata		
Corrugated Pipefish, Barbed Pipefish [66188]		Species or species habitat may occur within area
Campichthys tricarinatus		
Three-keel Pipefish [66192]		Species or species habitat may occur within area
Choeroichthys brachysoma		
Pacific Short-bodied Pipefish, Short-bodied Pipefish [66194]		Species or species habitat may occur within area
Choeroichthys suillus		
Pig-snouted Pipefish [66198]		Species or species habitat may occur within area
Corythoichthys amplexus		
Fijian Banded Pipefish, Brown-banded Pipefish [66199]		Species or species habitat may occur within area
Corythoichthys flavofasciatus		
Reticulate Pipefish, Yellow-banded Pipefish, Network Pipefish [66200]		Species or species habitat may occur within area
Corythoichthys haematopterus		
Reef-top Pipefish [66201]		Species or species habitat may occur within area
Corythoichthys intestinalis		
Australian Messmate Pipefish, Banded Pipefish [66202]		Species or species habitat may occur within area
Corythoichthys ocellatus		
Orange-spotted Pipefish, Ocellated Pipefish [66203]		Species or species habitat may occur within area
Corythoichthys schultzi		
Schultz's Pipefish [66205]		Species or species habitat may occur within area
Cosmocampus banneri		
Roughridge Pipefish [66206]		Species or species habitat may occur within area
Cosmocampus maxweberi		
Maxweber's Pipefish [66209]		Species or species habitat may occur within area
Doryrhamphus dactyliophorus		
Banded Pipefish, Ringed Pipefish [66210]		Species or species habitat may occur within area
Doryrhamphus excisus		
Bluestripe Pipefish, Indian Blue-stripe Pipefish, Pacific Blue-stripe Pipefish [66211]		Species or species habitat may occur within area
Doryrhamphus janssi		
Cleaner Pipefish, Janss' Pipefish [66212]		Species or species habitat may occur within area
Festucalex cinctus		
Girdled Pipefish [66214]		Species or species habitat may occur within area
Filicampus tigris		
Tiger Pipefish [66217]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Halicampus brocki Brock's Pipefish [66219]	1088	Species or species habitat may occur within area
Halicampus dunckeri Red-hair Pipefish, Duncker's Pipefish [66220]		Species or species habitat may occur within area
Halicampus grayi Mud Pipefish, Gray's Pipefish [66221]		Species or species habitat may occur within area
Halicampus macrorhynchus Whiskered Pipefish, Ornate Pipefish [66222]		Species or species habitat may occur within area
Halicampus spinirostris Spiny-snout Pipefish [66225]		Species or species habitat may occur within area
Haliichthys taeniophorus Ribbioned Pipehorse, Ribbioned Seadragon [66226]		Species or species habitat may occur within area
Hippichthys cyanospilos Blue-speckled Pipefish, Blue-spotted Pipefish [66228]		Species or species habitat may occur within area
Hippichthys heptagonus Madura Pipefish, Reticulated Freshwater Pipefish [66229]		Species or species habitat may occur within area
Hippichthys parvicarinatus Short-keel Pipefish, Short-keeled Pipefish [66230]		Species or species habitat may occur within area
Hippichthys penicillus Beady Pipefish, Steep-nosed Pipefish [66231]		Species or species habitat may occur within area
Hippichthys spicifer Belly-barred Pipefish, Banded Freshwater Pipefish [66232]		Species or species habitat may occur within area
Hippocampus angustus Western Spiny Seahorse, Narrow-bellied Seahorse [66234]		Species or species habitat may occur within area
Hippocampus histrix Spiny Seahorse, Thorny Seahorse [66236]		Species or species habitat may occur within area
Hippocampus kuda Spotted Seahorse, Yellow Seahorse [66237]		Species or species habitat may occur within area
Hippocampus planifrons Flat-face Seahorse [66238]		Species or species habitat may occur within area
Hippocampus spinosissimus Hedgehog Seahorse [66239]		Species or species habitat may occur within area
Hippocampus trimaculatus Three-spot Seahorse, Low-crowned Seahorse, Flat-faced Seahorse [66720]		Species or species habitat may occur within area
Hippocampus zebra Zebra Seahorse [66241]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Micrognathus brevirostris thorntail Pipefish, Thorn-tailed Pipefish [66254]	1089	Species or species habitat may occur within area
Micrognathus micronotopterus Tidepool Pipefish [66255]		Species or species habitat may occur within area
Microphis brachyurus Short-tail Pipefish, Short-tailed River Pipefish [66257]		Species or species habitat may occur within area
Solegnathus hardwickii Pallid Pipehorse, Hardwick's Pipehorse [66272]		Species or species habitat may occur within area
Solegnathus lettiensis Gunther's Pipehorse, Indonesian Pipefish [66273]		Species or species habitat may occur within area
Solenostomus cyanopterus Robust Ghostpipefish, Blue-finned Ghost Pipefish, [66183]		Species or species habitat may occur within area
Syngnathoides biaculeatus Double-end Pipehorse, Double-ended Pipehorse, Alligator Pipefish [66279]		Species or species habitat may occur within area
Trachyrhamphus bicoarctatus Bentstick Pipefish, Bend Stick Pipefish, Short-tailed Pipefish [66280]		Species or species habitat may occur within area
Trachyrhamphus longirostris Straightstick Pipefish, Long-nosed Pipefish, Straight Stick Pipefish [66281]		Species or species habitat may occur within area
Mammals		
Dugong dugon Dugong [28]		Species or species habitat known to occur within area
Reptiles		
Acalyptophis peronii Horned Seasnake [1114]		Species or species habitat may occur within area
Aipysurus duboisii Dubois' Seasnake [1116]		Species or species habitat may occur within area
Aipysurus eydouxii Spine-tailed Seasnake [1117]		Species or species habitat may occur within area
Aipysurus laevis Olive Seasnake [1120]		Species or species habitat may occur within area
Astrotia stokesii Stokes' Seasnake [1122]		Species or species habitat may occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Foraging, feeding or related behaviour known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Breeding known to occur within area
Crocodylus porosus Salt-water Crocodile, Estuarine Crocodile [1774]		Species or species habitat likely to occur within area

Name	Threatened	Type of Presence
Dermochelys coriacea	1090 Endangered	Congregation or aggregation known to occur within area
Leatherback Turtle, Leathery Turtle, Luth [1768]		
Disteira kingii		Species or species habitat may occur within area
Spectacled Seasnake [1123]		
Disteira major		Species or species habitat may occur within area
Olive-headed Seasnake [1124]		
Emydocephalus annulatus		Species or species habitat may occur within area
Turtle-headed Seasnake [1125]		
Enhydrina schistosa		Species or species habitat may occur within area
Beaked Seasnake [1126]		
Eretmochelys imbricata	Vulnerable	Breeding known to occur within area
Hawksbill Turtle [1766]		
Hydrelaps darwiniensis		Species or species habitat may occur within area
Black-ringed Seasnake [1100]		
Hydrophis atriceps		Species or species habitat may occur within area
Black-headed Seasnake [1101]		
Hydrophis caeruleus		Species or species habitat may occur within area
Dwarf Seasnake [1103]		
Hydrophis coggeri		Species or species habitat may occur within area
Slender-necked Seasnake [25925]		
Hydrophis czeblukovi		Species or species habitat may occur within area
Fine-spined Seasnake [59233]		
Hydrophis elegans		Species or species habitat may occur within area
Elegant Seasnake [1104]		
Hydrophis gracilis		Species or species habitat may occur within area
Slender Seasnake [1106]		
Hydrophis inornatus		Species or species habitat may occur within area
Plain Seasnake [1107]		
Hydrophis mcdowellii		Species or species habitat may occur within area
null [25926]		
Hydrophis melanosoma		Species or species habitat may occur within area
Black-banded Robust Seasnake [1109]		
Hydrophis ornatus		Species or species habitat may occur within area
Spotted Seasnake, Ornate Reef Seasnake [1111]		
Hydrophis pacificus		Species or species habitat may occur within area
Large-headed Seasnake, Pacific Seasnake [1112]		
Hydrophis vorisi		Species or species
a seasnake [25927]		

Name	Threatened	Type of Presence
Lapemis hardwickii Spine-bellied Seasnake [1113]	1091	habitat may occur within area Species or species habitat may occur within area
Laticauda colubrina a sea krait [1092]		Species or species habitat may occur within area
Laticauda laticaudata a sea krait [1093]		Species or species habitat may occur within area
Lepidochelys olivacea Olive Ridley Turtle, Pacific Ridley Turtle [1767]	Endangered	Breeding known to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Breeding known to occur within area
Parahydrophis mertonii Northern Mangrove Seasnake [1090]		Species or species habitat may occur within area
Pelamis platurus Yellow-bellied Seasnake [1091]		Species or species habitat may occur within area
Whales and other Cetaceans		
Name	Status	[Resource Information] Type of Presence
Mammals		
Balaenoptera borealis Sei Whale [34]	Vulnerable	Species or species habitat likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat may occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Species or species habitat likely to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Species or species habitat likely to occur within area
Delphinus delphis Common Dolphin, Short-beaked Common Dolphin [60]		Species or species habitat may occur within area
Feresa attenuata Pygmy Killer Whale [61]		Species or species habitat may occur within area
Globicephala macrorhynchus Short-finned Pilot Whale [62]		Species or species habitat may occur within area
Grampus griseus Risso's Dolphin, Grampus [64]		Species or species habitat may occur within area
Kogia breviceps Pygmy Sperm Whale [57]		Species or species habitat may occur within area
Kogia simus Dwarf Sperm Whale [58]		Species or species habitat may occur within area

Name	Status	Type of Presence
Megaptera novaeangliae Humpback Whale [38]	1092 Vulnerable	Species or species habitat likely to occur within area
Orcaella brevirostris Irrawaddy Dolphin [45]		Species or species habitat known to occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Peponocephala electra Melon-headed Whale [47]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Species or species habitat may occur within area
Pseudorca crassidens False Killer Whale [48]		Species or species habitat likely to occur within area
Sousa chinensis Indo-Pacific Humpback Dolphin [50]		Breeding known to occur within area
Stenella attenuata Spotted Dolphin, Pantropical Spotted Dolphin [51]		Species or species habitat may occur within area
Stenella coeruleoalba Striped Dolphin, Euphrosyne Dolphin [52]		Species or species habitat may occur within area
Stenella longirostris Long-snouted Spinner Dolphin [29]		Species or species habitat may occur within area
Steno bredanensis Rough-toothed Dolphin [30]		Species or species habitat may occur within area
Tursiops aduncus Indian Ocean Bottlenose Dolphin, Spotted Bottlenose Dolphin [68418]		Species or species habitat likely to occur within area
Tursiops aduncus (Arafura/Timor Sea populations) Spotted Bottlenose Dolphin (Arafura/Timor Sea populations) [78900]		Species or species habitat known to occur within area
Tursiops truncatus s. str. Bottlenose Dolphin [68417]		Species or species habitat may occur within area
Ziphius cavirostris Cuvier's Beaked Whale, Goose-beaked Whale [56]		Species or species habitat may occur within area

<u>Australian Marine Parks</u>		[Resource Information]
Name	Label	
Arafura	Multiple Use Zone (IUCN VI)	
Arafura	Special Purpose Zone (Trawl) (IUCN VI)	
Arnhem	Special Purpose Zone (IUCN VI)	
Gulf of Carpentaria	National Park Zone (IUCN II)	
Gulf of Carpentaria	Special Purpose Zone (Trawl) (IUCN VI)	
Joseph Bonaparte Gulf	Multiple Use Zone (IUCN VI)	

Name	1093	Label
Joseph Bonaparte Gulf		Special Purpose Zone (IUCN VI)
Limmen		Habitat Protection Zone (IUCN IV)
Oceanic Shoals		Multiple Use Zone (IUCN VI)
Oceanic Shoals		Special Purpose Zone (Trawl) (IUCN VI)
Wessel		Habitat Protection Zone (IUCN IV)
Wessel		Special Purpose Zone (Trawl) (IUCN VI)
West Cape York		Habitat Protection Zone (IUCN IV)
West Cape York		National Park Zone (IUCN II)
West Cape York		Special Purpose Zone (IUCN VI)

Extra Information

State and Territory Reserves [\[Resource Information \]](#)

Name	State
Anindilyakwa	NT
Marthakal	NT

Invasive Species [\[Resource Information \]](#)

Weeds reported here are the 20 species of national significance (WoNS), along with other introduced plants that are considered by the States and Territories to pose a particularly significant threat to biodiversity. The following feral animals are reported: Goat, Red Fox, Cat, Rabbit, Pig, Water Buffalo and Cane Toad. Maps from Landscape Health Project, National Land and Water Resources Audit, 2001.

Name	Status	Type of Presence
Plants		
Andropogon gayanus		
Gamba Grass [66895]		Species or species habitat likely to occur within area

Nationally Important Wetlands [\[Resource Information \]](#)

Name	State
Southern Gulf Aggregation	QLD

Key Ecological Features (Marine) [\[Resource Information \]](#)

Key Ecological Features are the parts of the marine ecosystem that are considered to be important for the biodiversity or ecosystem functioning and integrity of the Commonwealth Marine Area.

Name	Region
Carbonate bank and terrace system of the Van Gulf of Carpentaria basin	North
Gulf of Carpentaria basin	North
Gulf of Carpentaria coastal zone	North
Pinnacles of the Bonaparte Basin	North
Plateaux and saddle north-west of the Wellesley	North
Shelf break and slope of the Arafura Shelf	North
Submerged coral reefs of the Gulf of Carpentaria	North
Tributary Canyons of the Arafura Depression	North

Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

Coordinates

-14.758882 129.178077,-13.960657 128.826514,-13.768665 128.606788,-12.484784 128.496924,-11.183724 127.563087,-10.460737
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 129.178077,-14.758882 129.178077

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [Office of Environment and Heritage, New South Wales](#)
- [Department of Environment and Primary Industries, Victoria](#)
- [Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [Department of Environment, Water and Natural Resources, South Australia](#)
- [Department of Land and Resource Management, Northern Territory](#)
- [Department of Environmental and Heritage Protection, Queensland](#)
- [Department of Parks and Wildlife, Western Australia](#)
- [Environment and Planning Directorate, ACT](#)
- [Birdlife Australia](#)
- [Australian Bird and Bat Banding Scheme](#)
- [Australian National Wildlife Collection](#)
- Natural history museums of Australia
- [Museum Victoria](#)
- [Australian Museum](#)
- [South Australian Museum](#)
- [Queensland Museum](#)
- [Online Zoological Collections of Australian Museums](#)
- [Queensland Herbarium](#)
- [National Herbarium of NSW](#)
- [Royal Botanic Gardens and National Herbarium of Victoria](#)
- [Tasmanian Herbarium](#)
- [State Herbarium of South Australia](#)
- [Northern Territory Herbarium](#)
- [Western Australian Herbarium](#)
- [Australian National Herbarium, Canberra](#)
- [University of New England](#)
- [Ocean Biogeographic Information System](#)
- [Australian Government, Department of Defence Forestry Corporation, NSW](#)
- [Geoscience Australia](#)
- [CSIRO](#)
- [Australian Tropical Herbarium, Cairns](#)
- [eBird Australia](#)
- [Australian Government – Australian Antarctic Data Centre](#)
- [Museum and Art Gallery of the Northern Territory](#)
- [Australian Government National Environmental Science Program](#)
- [Australian Institute of Marine Science](#)
- [Reef Life Survey Australia](#)
- [American Museum of Natural History](#)
- [Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact Us](#) page.



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected.

Information on the coverage of this report and qualifications on data supporting this report are contained in the caveat at the end of the report.

Information is available about [Environment Assessments](#) and the EPBC Act including significance guidelines, forms and application process details.

Report created: 10/05/21 13:07:00

[Summary](#)

[Details](#)

[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

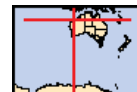
[Acknowledgements](#)



This map may contain data which are ©Commonwealth of Australia (Geoscience Australia), ©PSMA 2015

[Coordinates](#)

Buffer: 1.0Km



Matters of National Environmental Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	2
National Heritage Places:	5
Wetlands of International Importance:	2
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	2
Listed Threatened Ecological Communities:	1
Listed Threatened Species:	70
Listed Migratory Species:	84

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <http://www.environment.gov.au/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Land:	None
Commonwealth Heritage Places:	1
Listed Marine Species:	149
Whales and Other Cetaceans:	34
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	17

Extra Information

This part of the report provides information that may also be relevant to the area you have nominated.

State and Territory Reserves:	10
Regional Forest Agreements:	None
Invasive Species:	23
Nationally Important Wetlands:	3
Key Ecological Features (Marine)	5

Details

Matters of National Environmental Significance

World Heritage Properties			[Resource Information]
Name	State	Status	
Shark Bay, Western Australia	WA	Declared property	
The Ningaloo Coast	WA	Declared property	
National Heritage Properties			[Resource Information]
Name	State	Status	
Natural			
Shark Bay, Western Australia	WA	Listed place	
The Ningaloo Coast	WA	Listed place	
The West Kimberley	WA	Listed place	
Indigenous			
Dampier Archipelago (including Burrup Peninsula)	WA	Listed place	
Historic			
Dirk Hartog Landing Site 1616 - Cape Inscription Area	WA	Listed place	
Wetlands of International Importance (Ramsar)			[Resource Information]
Name	Proximity		
Eighty-mile beach	Within Ramsar site		
Ord river floodplain	Within 10km of Ramsar		
Commonwealth Marine Area			[Resource Information]
Approval is required for a proposed activity that is located within the Commonwealth Marine Area which has, will have, or is likely to have a significant impact on the environment. Approval may be required for a proposed action taken outside the Commonwealth Marine Area but which has, may have or is likely to have a significant impact on the environment in the Commonwealth Marine Area. Generally the Commonwealth Marine Area stretches from three nautical miles to two hundred nautical miles from the coast.			
Name			
EEZ and Territorial Sea			
Extended Continental Shelf			
Marine Regions			[Resource Information]
If you are planning to undertake action in an area in or close to the Commonwealth Marine Area, and a marine bioregional plan has been prepared for the Commonwealth Marine Area in that area, the marine bioregional plan may inform your decision as to whether to refer your proposed action under the EPBC Act.			
Name			
North-west			
Listed Threatened Ecological Communities			[Resource Information]
For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.			
Name	Status	Type of Presence	
Monsoon vine thickets on the coastal sand dunes of Dampier Peninsula	Endangered	Community likely to occur within area	
Listed Threatened Species			[Resource Information]
Name	Status	Type of Presence	
Birds			
Anous tenuirostris melanops Australian Lesser Noddy [26000]	Vulnerable	Foraging, feeding or related behaviour known to occur within area	
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area	
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species	

Name	Status	Type of Presence
Calidris tenuirostris Great Knot [862]	Critically Endangered	habitat known to occur within area Species or species habitat known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Diomedea amsterdamensis Amsterdam Albatross [64405]	Endangered	Species or species habitat likely to occur within area
Diomedea exulans Wandering Albatross [89223]	Vulnerable	Species or species habitat may occur within area
Erythrotriorchis radiatus Red Goshawk [942]	Vulnerable	Species or species habitat likely to occur within area
Erythrura gouldiae Gouldian Finch [413]	Endangered	Species or species habitat known to occur within area
Falco hypoleucos Grey Falcon [929]	Vulnerable	Species or species habitat known to occur within area
Falcunculus frontatus whitei Crested Shrike-tit (northern), Northern Shrike-tit [26013]	Vulnerable	Species or species habitat likely to occur within area
Geophaps smithii blaauwi Partridge Pigeon (western) [66501]	Vulnerable	Species or species habitat likely to occur within area
Leipoa ocellata Malleefowl [934]	Vulnerable	Species or species habitat likely to occur within area
Limosa lapponica baueri Nunivak Bar-tailed Godwit, Western Alaskan Bar-tailed Godwit [86380]	Vulnerable	Species or species habitat may occur within area
Limosa lapponica menzbieri Northern Siberian Bar-tailed Godwit, Russkoye Bar-tailed Godwit [86432]	Critically Endangered	Species or species habitat known to occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Macronectes halli Northern Giant Petrel [1061]	Vulnerable	Species or species habitat may occur within area
Malurus leucopterus leucopterus White-winged Fairy-wren (Dirk Hartog Island), Dirk Hartog Black-and-White Fairy-wren [26004]	Vulnerable	Species or species habitat likely to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat known to occur within area
Papasula abbotti Abbott's Booby [59297]	Endangered	Species or species habitat may occur within area
Pezoporus occidentalis Night Parrot [59350]	Endangered	Species or species habitat may occur within

Name	Status	Type of Presence area
Pterodroma mollis Soft-plumaged Petrel [1036]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Rostratula australis Australian Painted Snipe [77037]	Endangered	Species or species habitat likely to occur within area
Sternula nereis nereis Australian Fairy Tern [82950]	Vulnerable	Breeding known to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Foraging, feeding or related behaviour may occur within area
Thalassarche cauta Shy Albatross [89224]	Endangered	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Thalassarche melanophris Black-browed Albatross [66472]	Vulnerable	Species or species habitat may occur within area
Thalassarche steadi White-capped Albatross [64462]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Tyto novaehollandiae kimberli Masked Owl (northern) [26048]	Vulnerable	Species or species habitat likely to occur within area
Mammals		
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Bettongia lesueur lesueur Burrowing Bettong (Shark Bay), Boodie [66659]	Vulnerable	Species or species habitat likely to occur within area
Bettongia penicillata ogilbyi Woylie [66844]	Endangered	Species or species habitat likely to occur within area
Conilurus penicillatus Brush-tailed Rabbit-rat, Brush-tailed Tree-rat, Pakooma [132]	Vulnerable	Species or species habitat may occur within area
Dasyurus geoffroi Chuditch, Western Quoll [330]	Vulnerable	Species or species habitat may occur within area
Dasyurus hallucatus Northern Quoll, Digul [Gogo-Yimidir], Wijingadda [Dambimangari], Wiminji [Martu] [331]	Endangered	Species or species habitat known to occur within area
Eubalaena australis Southern Right Whale [40]	Endangered	Species or species habitat likely to occur within area

Name	Status	Type of Presence
Isoodon auratus auratus Golden Bandicoot (mainland) [66665]	Vulnerable	Species or species habitat likely to occur within area
Lagostrophus fasciatus fasciatus Banded Hare-wallaby, Merrnine, Marnine, Munning [66664]	Vulnerable	Translocated population known to occur within area
Leporillus conditor Wopilkara, Greater Stick-nest Rat [137]	Vulnerable	Translocated population known to occur within area
Macroderma gigas Ghost Bat [174]	Vulnerable	Species or species habitat known to occur within area
Macrotis lagotis Greater Bilby [282]	Vulnerable	Species or species habitat likely to occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Breeding known to occur within area
Neophoca cinerea Australian Sea-lion, Australian Sea Lion [22]	Endangered	Species or species habitat may occur within area
Perameles bougainville bougainville Western Barred Bandicoot (Shark Bay) [66631]	Endangered	Translocated population known to occur within area
Petrogale concinna monastria Nabarlek (Kimberley) [87607]	Endangered	Species or species habitat known to occur within area
Phascogale tapoatafa kimberleyensis Kimberley brush-tailed phascogale, Brush-tailed Phascogale (Kimberley) [88453]	Vulnerable	Species or species habitat likely to occur within area
Rhinonictes aurantia (Pilbara form) Pilbara Leaf-nosed Bat [82790]	Vulnerable	Species or species habitat may occur within area
Saccolaimus saccolaimus nudicluniatus Bare-rumped Sheath-tailed Bat, Bare-rumped Sheath-tail Bat [66889]	Vulnerable	Species or species habitat likely to occur within area
Xeromys myoides Water Mouse, False Water Rat, Yirrkoo [66]	Vulnerable	Species or species habitat may occur within area
Reptiles		
Aipysurus apraefrontalis Short-nosed Seasnake [1115]	Critically Endangered	Species or species habitat known to occur within area
Aipysurus foliosquama Leaf-scaled Seasnake [1118]	Critically Endangered	Species or species habitat likely to occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Breeding known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Breeding known to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Foraging, feeding or related behaviour known to occur within area
Egernia stokesii badia Western Spiny-tailed Skink, Baudin Island Spiny-tailed Skink [64483]	Endangered	Species or species habitat likely to occur

Name	Status	Type of Presence
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	within area Breeding known to occur within area
Lepidochelys olivacea Olive Ridley Turtle, Pacific Ridley Turtle [1767]	Endangered	Foraging, feeding or related behaviour known to occur within area
Lerista neviniae Nevin's Slider [85296]	Endangered	Species or species habitat known to occur within area
Liasis olivaceus barroni Olive Python (Pilbara subspecies) [66699]	Vulnerable	Species or species habitat likely to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Breeding known to occur within area
Sharks		
Carcharias taurus (west coast population) Grey Nurse Shark (west coast population) [68752]	Vulnerable	Species or species habitat known to occur within area
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat known to occur within area
Glyphis garricki Northern River Shark, New Guinea River Shark [82454]	Endangered	Species or species habitat known to occur within area
Pristis clavata Dwarf Sawfish, Queensland Sawfish [68447]	Vulnerable	Breeding known to occur within area
Pristis pristis Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish [60756]	Vulnerable	Species or species habitat known to occur within area
Pristis zijsron Green Sawfish, Dindagubba, Narrowsnout Sawfish [68442]	Vulnerable	Breeding known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Foraging, feeding or related behaviour known to occur within area

Listed Migratory Species [Resource Information]

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Migratory Marine Birds		
Anous stolidus Common Noddy [825]		Species or species habitat likely to occur within area
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
Ardenna carneipes Flesh-footed Shearwater, Fleshy-footed Shearwater [82404]		Species or species habitat likely to occur within area
Ardenna pacifica Wedge-tailed Shearwater [84292]		Breeding known to occur within area
Calonectris leucomelas Streaked Shearwater [1077]		Species or species habitat known to occur within area
Diomedea amsterdamensis Amsterdam Albatross [64405]	Endangered	Species or species

Name	Threatened	Type of Presence
	1103	habitat likely to occur within area
Diomedea exulans Wandering Albatross [89223]	Vulnerable	Species or species habitat may occur within area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat known to occur within area
Fregata minor Great Frigatebird, Greater Frigatebird [1013]		Species or species habitat likely to occur within area
Hydroprogne caspia Caspian Tern [808]		Breeding known to occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Macronectes halli Northern Giant Petrel [1061]	Vulnerable	Species or species habitat may occur within area
Onychoprion anaethetus Bridled Tern [82845]		Breeding known to occur within area
Phaethon lepturus White-tailed Tropicbird [1014]		Foraging, feeding or related behaviour likely to occur within area
Sterna dougallii Roseate Tern [817]		Breeding likely to occur within area
Sternula albifrons Little Tern [82849]		Breeding known to occur within area
Sula leucogaster Brown Booby [1022]		Breeding known to occur within area
Sula sula Red-footed Booby [1023]		Breeding known to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Foraging, feeding or related behaviour may occur within area
Thalassarche cauta Shy Albatross [89224]	Endangered	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Thalassarche melanophris Black-browed Albatross [66472]	Vulnerable	Species or species habitat may occur within area
Thalassarche steadi White-capped Albatross [64462]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Migratory Marine Species		
Anoxypristis cuspidata Narrow Sawfish, Knifetooth Sawfish [68448]		Species or species habitat likely to occur within area
Balaena glacialis australis Southern Right Whale [75529]	Endangered*	Species or species habitat likely to occur within area

Name	Threatened	Type of Presence
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]	1104	Species or species habitat likely to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Carcharhinus longimanus Oceanic Whitetip Shark [84108]		Species or species habitat likely to occur within area
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Species or species habitat known to occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Breeding known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Breeding known to occur within area
Crocodylus porosus Salt-water Crocodile, Estuarine Crocodile [1774]		Species or species habitat likely to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Foraging, feeding or related behaviour known to occur within area
Dugong dugon Dugong [28]		Breeding known to occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Breeding known to occur within area
Isurus oxyrinchus Shortfin Mako, Mako Shark [79073]		Species or species habitat likely to occur within area
Isurus paucus Longfin Mako [82947]		Species or species habitat likely to occur within area
Lamna nasus Porbeagle, Mackerel Shark [83288]		Species or species habitat may occur within area
Lepidochelys olivacea Olive Ridley Turtle, Pacific Ridley Turtle [1767]	Endangered	Foraging, feeding or related behaviour known to occur within area
Manta alfredi Reef Manta Ray, Coastal Manta Ray, Inshore Manta Ray, Prince Alfred's Ray, Resident Manta Ray [84994]		Species or species habitat known to occur within area
Manta birostris Giant Manta Ray, Chevron Manta Ray, Pacific Manta Ray, Pelagic Manta Ray, Oceanic Manta Ray [84995]		Species or species habitat known to occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Breeding known to occur

Name	Threatened	Type of Presence
Natator depressus Flatback Turtle [59257]	1105 Vulnerable	within area Breeding known to occur within area
Orcaella heinsohni Australian Shubfin Dolphin [81322]		Species or species habitat known to occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Species or species habitat may occur within area
Pristis clavata Dwarf Sawfish, Queensland Sawfish [68447]	Vulnerable	Breeding known to occur within area
Pristis pristis Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish [60756]	Vulnerable	Species or species habitat known to occur within area
Pristis zijsron Green Sawfish, Dindagubba, Narrowsnout Sawfish [68442]	Vulnerable	Breeding known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Sousa chinensis Indo-Pacific Humpback Dolphin [50]		Breeding known to occur within area
Tursiops aduncus (Arafura/Timor Sea populations) Spotted Bottlenose Dolphin (Arafura/Timor Sea populations) [78900]		Species or species habitat known to occur within area
Migratory Terrestrial Species		
Cecropis daurica Red-rumped Swallow [80610]		Species or species habitat may occur within area
Cuculus optatus Oriental Cuckoo, Horsfield's Cuckoo [86651]		Species or species habitat may occur within area
Hirundo rustica Barn Swallow [662]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat likely to occur within area
Migratory Wetlands Species		
Acrocephalus orientalis Oriental Reed-Warbler [59570]		Species or species habitat may occur within area
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat known to occur within area
Arenaria interpres Ruddy Turnstone [872]		Species or species habitat known to occur within area

Name	Threatened	Type of Presence
Calidris acuminata Sharp-tailed Sandpiper [874]	1106	Species or species habitat known to occur within area
Calidris alba Sanderling [875]		Species or species habitat known to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat known to occur within area
Calidris ruficollis Red-necked Stint [860]		Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius veredus Oriental Plover, Oriental Dotterel [882]		Species or species habitat may occur within area
Glareola maldivarum Oriental Pratincole [840]		Species or species habitat may occur within area
Limosa lapponica Bar-tailed Godwit [844]		Species or species habitat known to occur within area
Limosa limosa Black-tailed Godwit [845]		Species or species habitat known to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat known to occur within area
Numenius phaeopus Whimbrel [849]		Species or species habitat known to occur within area
Pandion haliaetus Osprey [952]		Breeding known to occur within area
Pluvialis squatarola Grey Plover [865]		Species or species habitat known to occur within area
Thalasseus bergii Greater Crested Tern [83000]		Breeding known to occur within area
Tringa brevipes Grey-tailed Tattler [851]		Species or species habitat known to occur within area
Tringa glareola Wood Sandpiper [829]		Species or species habitat known to occur

Name	Threatened	Type of Presence
Tringa nebularia Common Greenshank, Greenshank [832]	1107	within area Species or species habitat known to occur within area
Xenus cinereus Terek Sandpiper [59300]		Species or species habitat known to occur within area

Other Matters Protected by the EPBC Act

Commonwealth Heritage Places [\[Resource Information \]](#)

Name	State	Status
Natural		
Ningaloo Marine Area - Commonwealth Waters	WA	Listed place

Listed Marine Species [\[Resource Information \]](#)

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Birds		

Acrocephalus orientalis Oriental Reed-Warbler [59570]		Species or species habitat may occur within area
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat known to occur within area
Anous stolidus Common Noddy [825]		Species or species habitat likely to occur within area
Anous tenuirostris melanops Australian Lesser Noddy [26000]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Anseranas semipalmata Magpie Goose [978]		Species or species habitat may occur within area
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
Ardea ibis Cattle Egret [59542]		Species or species habitat may occur within area
Arenaria interpres Ruddy Turnstone [872]		Species or species habitat known to occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat known to occur within area
Calidris alba Sanderling [875]		Species or species

Name	Threatened	Type of Presence
	1108	habitat known to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat known to occur within area
Calidris ruficollis Red-necked Stint [860]		Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Calonectris leucomelas Streaked Shearwater [1077]		Species or species habitat known to occur within area
Catharacta skua Great Skua [59472]		Species or species habitat may occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius ruficapillus Red-capped Plover [881]		Species or species habitat known to occur within area
Charadrius veredus Oriental Plover, Oriental Dotterel [882]		Species or species habitat may occur within area
Chrysococcyx osculans Black-eared Cuckoo [705]		Species or species habitat likely to occur within area
Diomedea amsterdamensis Amsterdam Albatross [64405]	Endangered	Species or species habitat likely to occur within area
Diomedea exulans Wandering Albatross [89223]	Vulnerable	Species or species habitat may occur within area
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat known to occur within area
Fregata minor Great Frigatebird, Greater Frigatebird [1013]		Species or species habitat likely to occur within area
Glareola maldivarum Oriental Pratincole [840]		Species or species habitat may occur within area
Haliaeetus leucogaster White-bellied Sea-Eagle [943]		Species or species habitat known to occur within area
Heteroscelus brevipes Grey-tailed Tattler [59311]		Species or species habitat known to occur

Name	Threatened	Type of Presence
Himantopus himantopus Pied Stilt, Black-winged Stilt [870]	1109	within area Species or species habitat known to occur within area
Hirundo daurica Red-rumped Swallow [59480]		Species or species habitat may occur within area
Hirundo rustica Barn Swallow [662]		Species or species habitat may occur within area
Larus novaehollandiae Silver Gull [810]		Breeding known to occur within area
Larus pacificus Pacific Gull [811]		Foraging, feeding or related behaviour known to occur within area
Limosa lapponica Bar-tailed Godwit [844]		Species or species habitat known to occur within area
Limosa limosa Black-tailed Godwit [845]		Species or species habitat known to occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Macronectes halli Northern Giant Petrel [1061]	Vulnerable	Species or species habitat may occur within area
Merops ornatus Rainbow Bee-eater [670]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat likely to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat known to occur within area
Numenius phaeopus Whimbrel [849]		Species or species habitat known to occur within area
Pandion haliaetus Osprey [952]		Breeding known to occur within area
Papasula abbotti Abbott's Booby [59297]	Endangered	Species or species habitat may occur within area
Phaethon lepturus White-tailed Tropicbird [1014]		Foraging, feeding or related behaviour likely to occur within area
Pluvialis squatarola Grey Plover [865]		Species or species habitat known to occur within area
Pterodroma macroptera Great-winged Petrel [1035]		Foraging, feeding or

Name	Threatened	Type of Presence
	1110	related behaviour known to occur within area
Pterodroma mollis Soft-plumaged Petrel [1036]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Puffinus assimilis Little Shearwater [59363]		Foraging, feeding or related behaviour known to occur within area
Puffinus carneipes Flesh-footed Shearwater, Fleshy-footed Shearwater [1043]		Species or species habitat likely to occur within area
Puffinus pacificus Wedge-tailed Shearwater [1027]		Breeding known to occur within area
Recurvirostra novaehollandiae Red-necked Avocet [871]		Species or species habitat known to occur within area
Rostratula benghalensis (sensu lato) Painted Snipe [889]	Endangered*	Species or species habitat likely to occur within area
Sterna albifrons Little Tern [813]		Breeding known to occur within area
Sterna anaethetus Bridled Tern [814]		Breeding known to occur within area
Sterna bengalensis Lesser Crested Tern [815]		Breeding known to occur within area
Sterna bergii Crested Tern [816]		Breeding known to occur within area
Sterna caspia Caspian Tern [59467]		Breeding known to occur within area
Sterna dougallii Roseate Tern [817]		Breeding likely to occur within area
Sterna fuscata Sooty Tern [794]		Breeding known to occur within area
Sterna nereis Fairy Tern [796]		Breeding known to occur within area
Sula leucogaster Brown Booby [1022]		Breeding known to occur within area
Sula sula Red-footed Booby [1023]		Breeding known to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Foraging, feeding or related behaviour may occur within area
Thalassarche cauta Shy Albatross [89224]	Endangered	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Thalassarche melanophris Black-browed Albatross [66472]	Vulnerable	Species or species habitat may occur within area

Name	Threatened	Type of Presence
Thalassarche steadi White-capped Albatross [64462]	1111 Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Tringa glareola Wood Sandpiper [829]		Species or species habitat known to occur within area
Tringa nebularia Common Greenshank, Greenshank [832]		Species or species habitat known to occur within area
Xenus cinereus Terek Sandpiper [59300]		Species or species habitat known to occur within area
Fish		
Acentronura larsonae Helen's Pygmy Pipehorse [66186]		Species or species habitat may occur within area
Bhanotia fasciolata Corrugated Pipefish, Barbed Pipefish [66188]		Species or species habitat may occur within area
Bulbonaricus brauni Braun's Pughead Pipefish, Pug-headed Pipefish [66189]		Species or species habitat may occur within area
Campichthys galei Gale's Pipefish [66191]		Species or species habitat may occur within area
Campichthys tricarinatus Three-keel Pipefish [66192]		Species or species habitat may occur within area
Choeroichthys brachysoma Pacific Short-bodied Pipefish, Short-bodied Pipefish [66194]		Species or species habitat may occur within area
Choeroichthys latispinosus Muiron Island Pipefish [66196]		Species or species habitat may occur within area
Choeroichthys suillus Pig-snouted Pipefish [66198]		Species or species habitat may occur within area
Corythoichthys amplexus Fijian Banded Pipefish, Brown-banded Pipefish [66199]		Species or species habitat may occur within area
Corythoichthys flavofasciatus Reticulate Pipefish, Yellow-banded Pipefish, Network Pipefish [66200]		Species or species habitat may occur within area
Corythoichthys intestinalis Australian Messmate Pipefish, Banded Pipefish [66202]		Species or species habitat may occur within area
Corythoichthys schultzi Schultz's Pipefish [66205]		Species or species habitat may occur within area
Cosmocampus banneri Roughridge Pipefish [66206]		Species or species habitat may occur within area
Doryrhamphus dactyliophorus Banded Pipefish, Ringed Pipefish [66210]		Species or species habitat may occur within area

Name	1112 Threatened	Type of Presence
Doryrhamphus excisus Bluestripe Pipefish, Indian Blue-stripe Pipefish, Pacific Blue-stripe Pipefish [66211]		Species or species habitat may occur within area
Doryrhamphus janssi Cleaner Pipefish, Janss' Pipefish [66212]		Species or species habitat may occur within area
Doryrhamphus multiannulatus Many-banded Pipefish [66717]		Species or species habitat may occur within area
Doryrhamphus negrosensis Flagtail Pipefish, Masthead Island Pipefish [66213]		Species or species habitat may occur within area
Festucalex scalaris Ladder Pipefish [66216]		Species or species habitat may occur within area
Filicampus tigris Tiger Pipefish [66217]		Species or species habitat may occur within area
Halicampus brocki Brock's Pipefish [66219]		Species or species habitat may occur within area
Halicampus dunckeri Red-hair Pipefish, Duncker's Pipefish [66220]		Species or species habitat may occur within area
Halicampus grayi Mud Pipefish, Gray's Pipefish [66221]		Species or species habitat may occur within area
Halicampus nitidus Glittering Pipefish [66224]		Species or species habitat may occur within area
Halicampus spinirostris Spiny-snout Pipefish [66225]		Species or species habitat may occur within area
Haliichthys taeniophorus Ribbioned Pipehorse, Ribbioned Seadragon [66226]		Species or species habitat may occur within area
Hippichthys penicillus Beady Pipefish, Steep-nosed Pipefish [66231]		Species or species habitat may occur within area
Hippocampus angustus Western Spiny Seahorse, Narrow-bellied Seahorse [66234]		Species or species habitat may occur within area
Hippocampus histrix Spiny Seahorse, Thorny Seahorse [66236]		Species or species habitat may occur within area
Hippocampus kuda Spotted Seahorse, Yellow Seahorse [66237]		Species or species habitat may occur within area
Hippocampus planifrons Flat-face Seahorse [66238]		Species or species habitat may occur within area
Hippocampus spinosissimus Hedgehog Seahorse [66239]		Species or species habitat may occur within area

Name	1113 Threatened	Type of Presence
Hippocampus trimaculatus Three-spot Seahorse, Low-crowned Seahorse, Flat-faced Seahorse [66720]		Species or species habitat may occur within area
Lissocampus fatiloquus Prophet's Pipefish [66250]		Species or species habitat may occur within area
Micrognathus micronotopterus Tidepool Pipefish [66255]		Species or species habitat may occur within area
Nannocampus subosseus Bonyhead Pipefish, Bony-headed Pipefish [66264]		Species or species habitat may occur within area
Phoxocampus belcheri Black Rock Pipefish [66719]		Species or species habitat may occur within area
Solegnathus hardwickii Pallid Pipehorse, Hardwick's Pipehorse [66272]		Species or species habitat may occur within area
Solegnathus lettiensis Gunther's Pipehorse, Indonesian Pipefish [66273]		Species or species habitat may occur within area
Solenostomus cyanopterus Robust Ghostpipefish, Blue-finned Ghost Pipefish, [66183]		Species or species habitat may occur within area
Stigmatopora argus Spotted Pipefish, Gulf Pipefish, Peacock Pipefish [66276]		Species or species habitat may occur within area
Syngnathoides biaculeatus Double-end Pipehorse, Double-ended Pipehorse, Alligator Pipefish [66279]		Species or species habitat may occur within area
Trachyrhamphus bicoarctatus Bentstick Pipefish, Bend Stick Pipefish, Short-tailed Pipefish [66280]		Species or species habitat may occur within area
Trachyrhamphus longirostris Straightstick Pipefish, Long-nosed Pipefish, Straight Stick Pipefish [66281]		Species or species habitat may occur within area
Mammals		
Dugong dugon Dugong [28]		Breeding known to occur within area
Neophoca cinerea Australian Sea-lion, Australian Sea Lion [22]	Endangered	Species or species habitat may occur within area
Reptiles		
Acalyptophis peronii Horned Seasnake [1114]		Species or species habitat may occur within area
Aipysurus apraefrontalis Short-nosed Seasnake [1115]	Critically Endangered	Species or species habitat known to occur within area
Aipysurus duboisii Dubois' Seasnake [1116]		Species or species habitat may occur within area
Aipysurus eydouxii Spine-tailed Seasnake [1117]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Aipysurus foliosquama Leaf-scaled Seasnake [1118]	1114 Critically Endangered	Species or species habitat likely to occur within area
Aipysurus laevis Olive Seasnake [1120]		Species or species habitat may occur within area
Aipysurus pooleorum Shark Bay Seasnake [66061]		Species or species habitat may occur within area
Aipysurus tenuis Brown-lined Seasnake [1121]		Species or species habitat may occur within area
Astrotia stokesii Stokes' Seasnake [1122]		Species or species habitat may occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Breeding known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Breeding known to occur within area
Crocodylus johnstoni Freshwater Crocodile, Johnston's Crocodile, Johnstone's Crocodile [1773]		Species or species habitat may occur within area
Crocodylus porosus Salt-water Crocodile, Estuarine Crocodile [1774]		Species or species habitat likely to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Foraging, feeding or related behaviour known to occur within area
Disteira kingii Spectacled Seasnake [1123]		Species or species habitat may occur within area
Disteira major Olive-headed Seasnake [1124]		Species or species habitat may occur within area
Emydocephalus annulatus Turtle-headed Seasnake [1125]		Species or species habitat may occur within area
Enhydrina schistosa Beaked Seasnake [1126]		Species or species habitat may occur within area
Ephalophis greyi North-western Mangrove Seasnake [1127]		Species or species habitat may occur within area
Eretmochelys imbricata Hawksbill Turtle [1766]	Vulnerable	Breeding known to occur within area
Hydrelaps darwiniensis Black-ringed Seasnake [1100]		Species or species habitat may occur within area
Hydrophis atriceps Black-headed Seasnake [1101]		Species or species habitat may occur within area
Hydrophis coggeri Slender-necked Seasnake [25925]		Species or species habitat may occur within area

Name	1115 Threatened	Type of Presence
Hydrophis czeblukovi Fine-spined Seasnake [59233]		Species or species habitat may occur within area
Hydrophis elegans Elegant Seasnake [1104]		Species or species habitat may occur within area
Hydrophis inornatus Plain Seasnake [1107]		Species or species habitat may occur within area
Hydrophis mcdowellii null [25926]		Species or species habitat may occur within area
Hydrophis ornatus Spotted Seasnake, Ornate Reef Seasnake [1111]		Species or species habitat may occur within area
Lapemis hardwickii Spine-bellied Seasnake [1113]		Species or species habitat may occur within area
Lepidochelys olivacea Olive Ridley Turtle, Pacific Ridley Turtle [1767]	Endangered	Foraging, feeding or related behaviour known to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Breeding known to occur within area
Pelamis platurus Yellow-bellied Seasnake [1091]		Species or species habitat may occur within area

Whales and other Cetaceans		[Resource Information]
Name	Status	Type of Presence
Mammals		
Balaenoptera acutorostrata Minke Whale [33]		Species or species habitat may occur within area
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Delphinus delphis Common Dolphin, Short-beaked Common Dolphin [60]		Species or species habitat may occur within area
Eubalaena australis Southern Right Whale [40]	Endangered	Species or species habitat likely to occur within area
Feresa attenuata Pygmy Killer Whale [61]		Species or species habitat may occur within

Name	Status	Type of Presence
Globicephala macrorhynchus Short-finned Pilot Whale [62]	1116	area Species or species habitat may occur within area
Globicephala melas Long-finned Pilot Whale [59282]		Species or species habitat may occur within area
Grampus griseus Risso's Dolphin, Grampus [64]		Species or species habitat may occur within area
Indopacetus pacificus Longman's Beaked Whale [72]		Species or species habitat may occur within area
Kogia breviceps Pygmy Sperm Whale [57]		Species or species habitat may occur within area
Kogia simus Dwarf Sperm Whale [58]		Species or species habitat may occur within area
Lagenodelphis hosei Fraser's Dolphin, Sarawak Dolphin [41]		Species or species habitat may occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Breeding known to occur within area
Mesoplodon densirostris Blainville's Beaked Whale, Dense-beaked Whale [74]		Species or species habitat may occur within area
Mesoplodon ginkgodens Ginkgo-toothed Beaked Whale, Ginkgo-toothed Whale, Ginkgo Beaked Whale [59564]		Species or species habitat may occur within area
Mesoplodon grayi Gray's Beaked Whale, Scamperdown Whale [75]		Species or species habitat may occur within area
Orcaella brevirostris Irrawaddy Dolphin [45]		Species or species habitat known to occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Peponocephala electra Melon-headed Whale [47]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Species or species habitat may occur within area
Pseudorca crassidens False Killer Whale [48]		Species or species habitat likely to occur within area
Sousa chinensis Indo-Pacific Humpback Dolphin [50]		Breeding known to occur within area
Stenella attenuata Spotted Dolphin, Pantropical Spotted Dolphin [51]		Species or species habitat may occur within area
Stenella coeruleoalba Striped Dolphin, Euphrosyne Dolphin [52]		Species or species

Name	Status	Type of Presence
	1117	habitat may occur within area
Stenella longirostris		
Long-snouted Spinner Dolphin [29]		Species or species habitat may occur within area
Steno bredanensis		
Rough-toothed Dolphin [30]		Species or species habitat may occur within area
Tursiops aduncus		
Indian Ocean Bottlenose Dolphin, Spotted Bottlenose Dolphin [68418]		Species or species habitat likely to occur within area
Tursiops aduncus (Arafura/Timor Sea populations)		
Spotted Bottlenose Dolphin (Arafura/Timor Sea populations) [78900]		Species or species habitat known to occur within area
Tursiops truncatus s. str.		
Bottlenose Dolphin [68417]		Species or species habitat may occur within area
Ziphius cavirostris		
Cuvier's Beaked Whale, Goose-beaked Whale [56]		Species or species habitat may occur within area

Australian Marine Parks [Resource Information]

Name	Label
Abrolhos	Habitat Protection Zone (IUCN IV)
Abrolhos	Multiple Use Zone (IUCN VI)
Abrolhos	Special Purpose Zone (IUCN VI)
Argo-Rowley Terrace	Multiple Use Zone (IUCN VI)
Argo-Rowley Terrace	National Park Zone (IUCN II)
Dampier	Habitat Protection Zone (IUCN IV)
Dampier	Multiple Use Zone (IUCN VI)
Eighty Mile Beach	Multiple Use Zone (IUCN VI)
Gascoyne	Habitat Protection Zone (IUCN IV)
Gascoyne	Multiple Use Zone (IUCN VI)
Gascoyne	National Park Zone (IUCN II)
Joseph Bonaparte Gulf	Multiple Use Zone (IUCN VI)
Kimberley	Multiple Use Zone (IUCN VI)
Ningaloo	Recreational Use Zone (IUCN IV)
Oceanic Shoals	Multiple Use Zone (IUCN VI)
Roebuck	Multiple Use Zone (IUCN VI)
Shark Bay	Multiple Use Zone (IUCN VI)

Extra Information

State and Territory Reserves [Resource Information]

Name	State
Bardi Jawi	WA
Dambimangari	WA
Dambimangari	WA
Dirk Hartog Island	WA
Faure Island	WA
Little Rocky Island	WA
Tent Island	WA
Unnamed WA36913	WA
Unnamed WA36915	WA
Uunguu	WA

Weeds reported here are the 20 species of national significance (WoNS), along with other introduced plants that are considered by the States and Territories to pose a particularly significant threat to biodiversity. The following feral animals are reported: Goat, Red Fox, Cat, Rabbit, Pig, Water Buffalo and Cane Toad. Maps from Landscape Health Project, National Land and Water Resources Audit, 2001.

Name	Status	Type of Presence
Birds		
Columba livia Rock Pigeon, Rock Dove, Domestic Pigeon [803]		Species or species habitat likely to occur within area
Passer montanus Eurasian Tree Sparrow [406]		Species or species habitat likely to occur within area
Streptopelia senegalensis Laughing Turtle-dove, Laughing Dove [781]		Species or species habitat likely to occur within area
Frogs		
Rhinella marina Cane Toad [83218]		Species or species habitat may occur within area
Mammals		
Canis lupus familiaris Domestic Dog [82654]		Species or species habitat likely to occur within area
Capra hircus Goat [2]		Species or species habitat likely to occur within area
Equus asinus Donkey, Ass [4]		Species or species habitat likely to occur within area
Equus caballus Horse [5]		Species or species habitat likely to occur within area
Felis catus Cat, House Cat, Domestic Cat [19]		Species or species habitat likely to occur within area
Mus musculus House Mouse [120]		Species or species habitat likely to occur within area
Oryctolagus cuniculus Rabbit, European Rabbit [128]		Species or species habitat likely to occur within area
Rattus rattus Black Rat, Ship Rat [84]		Species or species habitat likely to occur within area
Sus scrofa Pig [6]		Species or species habitat likely to occur within area
Vulpes vulpes Red Fox, Fox [18]		Species or species habitat likely to occur within area
Plants		
Andropogon gayanus Gamba Grass [66895]		Species or species habitat likely to occur within area
Cenchrus ciliaris Buffel-grass, Black Buffel-grass [20213]		Species or species

Name	Status	Type of Presence
	1119	habitat likely to occur within area
Jatropha gossypifolia Cotton-leaved Physic-Nut, Bellyache Bush, Cotton-leaf Physic Nut, Cotton-leaf Jatropha, Black Physic Nut [7507]		Species or species habitat likely to occur within area
Lantana camara Lantana, Common Lantana, Kamara Lantana, Large-leaf Lantana, Pink Flowered Lantana, Red Flowered Lantana, Red-Flowered Sage, White Sage, Wild Sage [10892]		Species or species habitat may occur within area
Lycium ferocissimum African Boxthorn, Boxthorn [19235]		Species or species habitat likely to occur within area
Opuntia spp. Prickly Pears [82753]		Species or species habitat likely to occur within area
Parkinsonia aculeata Parkinsonia, Jerusalem Thorn, Jelly Bean Tree, Horse Bean [12301]		Species or species habitat likely to occur within area
Tamarix aphylla Athel Pine, Athel Tree, Tamarisk, Athel Tamarisk, Athel Tamarix, Desert Tamarisk, Flowering Cypress, Salt Cedar [16018]		Species or species habitat likely to occur within area
Reptiles		
Ramphotyphlops braminus Flowerpot Blind Snake, Brahminy Blind Snake, Cacing Besi [1258]		Species or species habitat likely to occur within area

Nationally Important Wetlands [Resource Information]

Name	State
Exmouth Gulf East	WA
Hamelin Pool	WA
Shark Bay East	WA

Key Ecological Features (Marine) [Resource Information]

Key Ecological Features are the parts of the marine ecosystem that are considered to be important for the biodiversity or ecosystem functioning and integrity of the Commonwealth Marine Area.

Name	Region
Carbonate bank and terrace system of the Sahul	North-west
Commonwealth waters adjacent to Ningaloo Reef	North-west
Continental Slope Demersal Fish Communities	North-west
Pinnacles of the Bonaparte Basin	North-west
Wallaby Saddle	North-west

Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

Coordinates

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 123.067447,-11.926411 123.440982,-12.248693 123.583804,-11.63603 125.737125,-11.334573 126.539126,-11.280707 127.440005,-11.269933
 127.440005

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [Office of Environment and Heritage, New South Wales](#)
- [Department of Environment and Primary Industries, Victoria](#)
- [Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [Department of Environment, Water and Natural Resources, South Australia](#)
- [Department of Land and Resource Management, Northern Territory](#)
- [Department of Environmental and Heritage Protection, Queensland](#)
- [Department of Parks and Wildlife, Western Australia](#)
- [Environment and Planning Directorate, ACT](#)
- [Birdlife Australia](#)
- [Australian Bird and Bat Banding Scheme](#)
- [Australian National Wildlife Collection](#)
- Natural history museums of Australia
- [Museum Victoria](#)
- [Australian Museum](#)
- [South Australian Museum](#)
- [Queensland Museum](#)
- [Online Zoological Collections of Australian Museums](#)
- [Queensland Herbarium](#)
- [National Herbarium of NSW](#)
- [Royal Botanic Gardens and National Herbarium of Victoria](#)
- [Tasmanian Herbarium](#)
- [State Herbarium of South Australia](#)
- [Northern Territory Herbarium](#)
- [Western Australian Herbarium](#)
- [Australian National Herbarium, Canberra](#)
- [University of New England](#)
- [Ocean Biogeographic Information System](#)
- [Australian Government, Department of Defence Forestry Corporation, NSW](#)
- [Geoscience Australia](#)
- [CSIRO](#)
- [Australian Tropical Herbarium, Cairns](#)
- [eBird Australia](#)
- [Australian Government – Australian Antarctic Data Centre](#)
- [Museum and Art Gallery of the Northern Territory](#)
- [Australian Government National Environmental Science Program](#)
- [Australian Institute of Marine Science](#)
- [Reef Life Survey Australia](#)
- [American Museum of Natural History](#)
- [Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact Us](#) page.



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected.

Information on the coverage of this report and qualifications on data supporting this report are contained in the caveat at the end of the report.

Information is available about [Environment Assessments](#) and the EPBC Act including significance guidelines, forms and application process details.

Report created: 10/05/21 12:51:00

[Summary](#)

[Details](#)

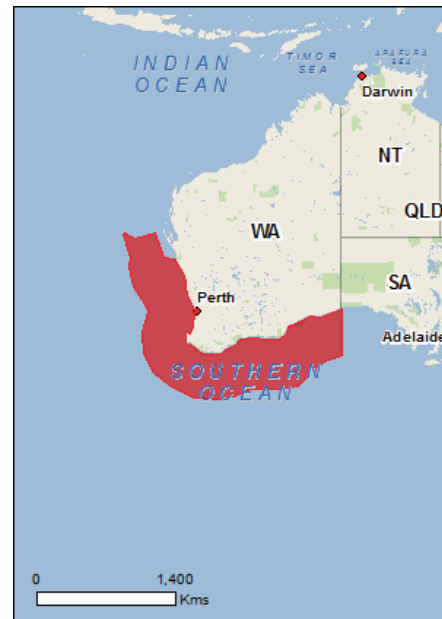
[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

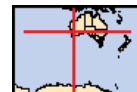
[Acknowledgements](#)



This map may contain data which are
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[Coordinates](#)

Buffer: 1.0Km



Summary

Matters of National Environmental Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	None
National Heritage Places:	1
Wetlands of International Importance:	4
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	2
Listed Threatened Ecological Communities:	3
Listed Threatened Species:	65
Listed Migratory Species:	67

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <http://www.environment.gov.au/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Land:	2
Commonwealth Heritage Places:	1
Listed Marine Species:	106
Whales and Other Cetaceans:	40
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	21

Extra Information

This part of the report provides information that may also be relevant to the area you have nominated.

State and Territory Reserves:	10
Regional Forest Agreements:	None
Invasive Species:	42
Nationally Important Wetlands:	None
Key Ecological Features (Marine)	8

Details

Matters of National Environmental Significance

National Heritage Properties [\[Resource Information \]](#)

Name	State	Status
Indigenous		
Cheetup Rock Shelter	WA	Listed place

Wetlands of International Importance (Ramsar) [\[Resource Information \]](#)

Name	Proximity
Becher point wetlands	Within 10km of Ramsar
Forrestdale and thomsons lakes	Within 10km of Ramsar
Peel-yalgorup system	Within 10km of Ramsar
Vasse-wonnerup system	Within 10km of Ramsar

Commonwealth Marine Area [\[Resource Information \]](#)

Approval is required for a proposed activity that is located within the Commonwealth Marine Area which has, will have, or is likely to have a significant impact on the environment. Approval may be required for a proposed action taken outside the Commonwealth Marine Area but which has, may have or is likely to have a significant impact on the environment in the Commonwealth Marine Area. Generally the Commonwealth Marine Area stretches from three nautical miles to two hundred nautical miles from the coast.

Name

EEZ and Territorial Sea
Extended Continental Shelf

Marine Regions [\[Resource Information \]](#)

If you are planning to undertake action in an area in or close to the Commonwealth Marine Area, and a marine bioregional plan has been prepared for the Commonwealth Marine Area in that area, the marine bioregional plan may inform your decision as to whether to refer your proposed action under the EPBC Act.

Name

[South-west](#)

Listed Threatened Ecological Communities [\[Resource Information \]](#)

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Name	Status	Type of Presence
Banksia Woodlands of the Swan Coastal Plain ecological community	Endangered	Community may occur within area
Proteaceae Dominated Kwongkan Shrublands of the Southeast Coastal Floristic Province of Western Australia	Endangered	Community may occur within area
Tuart (Eucalyptus gomphocephala) Woodlands and Forests of the Swan Coastal Plain ecological community	Critically Endangered	Community likely to occur within area

Listed Threatened Species [\[Resource Information \]](#)

Name	Status	Type of Presence
Birds		
Anous tenuirostris melanops Australian Lesser Noddy [26000]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Atrichornis clamosus Noisy Scrub-bird, Tjimiluk [654]	Endangered	Species or species habitat known to occur within area
Botaurus poiciloptilus Australasian Bittern [1001]	Endangered	Species or species habitat likely to occur within area

Name	Status	Type of Presence
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Calyptorhynchus banksii naso Forest Red-tailed Black-Cockatoo, Karrak [67034]	Vulnerable	Species or species habitat likely to occur within area
Calyptorhynchus latirostris Carnaby's Cockatoo, Short-billed Black-Cockatoo [59523]	Endangered	Species or species habitat known to occur within area
Cereopsis novaehollandiae grisea Cape Barren Goose (south-western), Recherche Cape Barren Goose [25978]	Vulnerable	Breeding known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius mongolus Lesser Sand Plover, Mongolian Plover [879]	Endangered	Species or species habitat known to occur within area
Diomedea amsterdamensis Amsterdam Albatross [64405]	Endangered	Species or species habitat likely to occur within area
Diomedea antipodensis Antipodean Albatross [64458]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea dabbenena Tristan Albatross [66471]	Endangered	Species or species habitat likely to occur within area
Diomedea epomophora Southern Royal Albatross [89221]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea exulans Wandering Albatross [89223]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea sanfordi Northern Royal Albatross [64456]	Endangered	Foraging, feeding or related behaviour likely to occur within area
Falco hypoleucos Grey Falcon [929]	Vulnerable	Species or species habitat likely to occur within area
Halobaena caerulea Blue Petrel [1059]	Vulnerable	Species or species habitat may occur within area
Leipoa ocellata Malleefowl [934]	Vulnerable	Species or species habitat may occur within area
Limosa lapponica menzbieri Northern Siberian Bar-tailed Godwit, Russkoye Bar-tailed Godwit [86432]	Critically Endangered	Species or species habitat known to occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel	Endangered	Species or species

Name	Status	Type of Presence
[1060]	1126	habitat may occur within area
Macronectes halli Northern Giant Petrel [1061]	Vulnerable	Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat likely to occur within area
Pachyptila turtur subantarctica Fairy Prion (southern) [64445]	Vulnerable	Species or species habitat known to occur within area
Pezoporus flaviventris Western Ground Parrot, Kyloring [84650]	Critically Endangered	Species or species habitat likely to occur within area
Phoebetria fusca Sooty Albatross [1075]	Vulnerable	Species or species habitat likely to occur within area
Pterodroma mollis Soft-plumaged Petrel [1036]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Rostratula australis Australian Painted Snipe [77037]	Endangered	Species or species habitat known to occur within area
Sternula nereis nereis Australian Fairy Tern [82950]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Foraging, feeding or related behaviour may occur within area
Thalassarche cauta Shy Albatross [89224]	Endangered	Foraging, feeding or related behaviour likely to occur within area
Thalassarche chrysostoma Grey-headed Albatross [66491]	Endangered	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Thalassarche melanophris Black-browed Albatross [66472]	Vulnerable	Species or species habitat may occur within area
Thalassarche steadi White-capped Albatross [64462]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Mammals		
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Bettongia penicillata ogilbyi Woylie [66844]	Endangered	Species or species habitat may occur within

Name	Status	Type of Presence area
Dasyurus geoffroi Chuditch, Western Quoll [330]	Vulnerable	Species or species habitat may occur within area
Eubalaena australis Southern Right Whale [40]	Endangered	Breeding known to occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Neophoca cinerea Australian Sea-lion, Australian Sea Lion [22]	Endangered	Breeding known to occur within area
Parantechinus apicalis Dibbler [313]	Endangered	Species or species habitat known to occur within area
Petrogale lateralis hacketti Recherche Rock-wallaby [66849]	Vulnerable	Species or species habitat known to occur within area
Potorous gilbertii Gilbert's Potoroo, Ngilkat [66642]	Critically Endangered	Translocated population known to occur within area
Pseudocheirus occidentalis Western Ringtail Possum, Ngwayir, Womp, Woder, Ngoor, Ngoolangit [25911]	Critically Endangered	Species or species habitat may occur within area
Setonix brachyurus Quokka [229]	Vulnerable	Species or species habitat known to occur within area
Plants		
Caladenia elegans Elegant Spider-orchid [56775]	Endangered	Species or species habitat may occur within area
Caladenia granitora [65292]	Endangered	Species or species habitat may occur within area
Caladenia hoffmanii Hoffman's Spider-orchid [56719]	Endangered	Species or species habitat may occur within area
Diuris micrantha Dwarf Bee-orchid [55082]	Vulnerable	Species or species habitat likely to occur within area
Drummondita ericoides Morseby Range Drummondita [9193]	Endangered	Species or species habitat likely to occur within area
Eucalyptus insularis Twin Peak Island Mallee [3057]	Endangered	Species or species habitat likely to occur within area
Isopogon uncinatus Albany Cone Bush, Hook-leaf Isopogon [20871]	Endangered	Species or species habitat likely to occur within area
Reptiles		
Caretta caretta Loggerhead Turtle [1763]	Endangered	Foraging, feeding or related behaviour known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Foraging, feeding or related behaviour known to occur within area

Name	Status	Type of Presence
Dermochelys coriacea	1128 Endangered	Foraging, feeding or related behaviour known to occur within area
Leatherback Turtle, Leathery Turtle, Luth [1768]		
Egernia stokesii badia	Endangered	Species or species habitat may occur within area
Western Spiny-tailed Skink, Baudin Island Spiny-tailed Skink [64483]		
Liopholis pulchra longicauda	Vulnerable	Species or species habitat known to occur within area
Jurien Bay Skink, Jurien Bay Rock-skink [83162]		
Natator depressus	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Flatback Turtle [59257]		
Sharks		
Carcharias taurus (west coast population)	Vulnerable	Species or species habitat known to occur within area
Grey Nurse Shark (west coast population) [68752]		
Carcharodon carcharias	Vulnerable	Foraging, feeding or related behaviour known to occur within area
White Shark, Great White Shark [64470]		
Rhincodon typus	Vulnerable	Species or species habitat may occur within area
Whale Shark [66680]		
Listed Migratory Species		[Resource Information]
* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.		
Name	Threatened	Type of Presence
Migratory Marine Birds		
Anous stolidus		Species or species habitat likely to occur within area
Common Noddy [825]		
Apus pacificus		Species or species habitat likely to occur within area
Fork-tailed Swift [678]		
Ardenna carneipes		Breeding known to occur within area
Flesh-footed Shearwater, Fleshy-footed Shearwater [82404]		
Ardenna grisea		Species or species habitat may occur within area
Sooty Shearwater [82651]		
Ardenna pacifica		Breeding known to occur within area
Wedge-tailed Shearwater [84292]		
Ardenna tenuirostris		Breeding known to occur within area
Short-tailed Shearwater [82652]		
Diomedea amsterdamensis	Endangered	Species or species habitat likely to occur within area
Amsterdam Albatross [64405]		
Diomedea antipodensis	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Antipodean Albatross [64458]		
Diomedea dabbenena	Endangered	Species or species habitat likely to occur within area
Tristan Albatross [66471]		
Diomedea epomophora	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Southern Royal Albatross [89221]		

Name	Threatened	Type of Presence
Diomedea exulans	1129	
Wandering Albatross [89223]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea sanfordi		
Northern Royal Albatross [64456]	Endangered	Foraging, feeding or related behaviour likely to occur within area
Fregata ariel		
Lesser Frigatebird, Least Frigatebird [1012]		Species or species habitat likely to occur within area
Hydroprogne caspia		
Caspian Tern [808]		Breeding known to occur within area
Macronectes giganteus		
Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Macronectes halli		
Northern Giant Petrel [1061]	Vulnerable	Species or species habitat may occur within area
Onychoprion anaethetus		
Bridled Tern [82845]		Breeding known to occur within area
Phoebetria fusca		
Sooty Albatross [1075]	Vulnerable	Species or species habitat likely to occur within area
Sterna dougallii		
Roseate Tern [817]		Breeding known to occur within area
Thalassarche carteri		
Indian Yellow-nosed Albatross [64464]	Vulnerable	Foraging, feeding or related behaviour may occur within area
Thalassarche cauta		
Shy Albatross [89224]	Endangered	Foraging, feeding or related behaviour likely to occur within area
Thalassarche chrysostoma		
Grey-headed Albatross [66491]	Endangered	Species or species habitat may occur within area
Thalassarche impavida		
Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Thalassarche melanophris		
Black-browed Albatross [66472]	Vulnerable	Species or species habitat may occur within area
Thalassarche steadi		
White-capped Albatross [64462]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Migratory Marine Species		
Balaena glacialis australis		
Southern Right Whale [75529]	Endangered*	Breeding known to occur within area
Balaenoptera bonaerensis		
Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area
Balaenoptera borealis		
Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera edeni		
Bryde's Whale [35]		Species or species habitat likely to occur within area

Name	Threatened	Type of Presence
Balaenoptera musculus Blue Whale [36]	1130 Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Caperea marginata Pygmy Right Whale [39]		Foraging, feeding or related behaviour may occur within area
Carcharhinus longimanus Oceanic Whitetip Shark [84108]		Species or species habitat likely to occur within area
Carcharodon carcharias White Shark, Great White Shark [64470]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Foraging, feeding or related behaviour known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Foraging, feeding or related behaviour known to occur within area
Isurus oxyrinchus Shortfin Mako, Mako Shark [79073]		Species or species habitat likely to occur within area
Isurus paucus Longfin Mako [82947]		Species or species habitat likely to occur within area
Lagenorhynchus obscurus Dusky Dolphin [43]		Species or species habitat likely to occur within area
Lamna nasus Porbeagle, Mackerel Shark [83288]		Species or species habitat likely to occur within area
Manta alfredi Reef Manta Ray, Coastal Manta Ray, Inshore Manta Ray, Prince Alfred's Ray, Resident Manta Ray [84994]		Species or species habitat known to occur within area
Manta birostris Giant Manta Ray, Chevron Manta Ray, Pacific Manta Ray, Pelagic Manta Ray, Oceanic Manta Ray [84995]		Species or species habitat known to occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Foraging, feeding or related behaviour known to occur within area
Rhincodon typus Whale Shark [66680]	Vulnerable	Species or species

Name	Threatened	Type of Presence
	1131	habitat may occur within area
Migratory Terrestrial Species		
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Migratory Wetlands Species		
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat known to occur within area
Arenaria interpres Ruddy Turnstone [872]		Species or species habitat known to occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat likely to occur within area
Calidris alba Sanderling [875]		Species or species habitat known to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat likely to occur within area
Calidris ruficollis Red-necked Stint [860]		Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius mongolus Lesser Sand Plover, Mongolian Plover [879]	Endangered	Species or species habitat known to occur within area
Glareola maldivarum Oriental Pratincole [840]		Species or species habitat known to occur within area
Limosa lapponica Bar-tailed Godwit [844]		Species or species habitat known to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat likely to occur within area
Pandion haliaetus Osprey [952]		Breeding known to occur within area
Thalasseus bergii Greater Crested Tern [83000]		Breeding known to occur within area
Tringa brevipes Grey-tailed Tattler [851]		Species or species habitat known to occur

Name	Threatened	Type of Presence
Tringa nebularia Common Greenshank, Greenshank [832]	1132	within area Species or species habitat likely to occur within area

Other Matters Protected by the EPBC Act

Commonwealth Land [\[Resource Information \]](#)

The Commonwealth area listed below may indicate the presence of Commonwealth land in this vicinity. Due to the unreliability of the data source, all proposals should be checked as to whether it impacts on a Commonwealth area, before making a definitive decision. Contact the State or Territory government land department for further information.

Name
Commonwealth Land - Defence - HMAS STIRLING-ROCKINGHAM ;HMAS STIRLING - GARDEN ISLAND

Commonwealth Heritage Places [\[Resource Information \]](#)

Name	State	Status
Natural		
Garden Island	WA	Listed place

Listed Marine Species [\[Resource Information \]](#)

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Birds		

Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat known to occur within area
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Anous stolidus Common Noddy [825]		Species or species habitat likely to occur within area
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Anous tenuirostris melanops Australian Lesser Noddy [26000]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
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Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
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Ardea ibis Cattle Egret [59542]		Species or species habitat may occur within area
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Arenaria interpres Ruddy Turnstone [872]		Species or species habitat known to occur within area
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Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat likely to occur within area
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Calidris alba Sanderling [875]		Species or species
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Name	Threatened	Type of Presence
	1133	habitat known to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat known to occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat known to occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat likely to occur within area
Calidris ruficollis Red-necked Stint [860]		Species or species habitat known to occur within area
Calidris tenuirostris Great Knot [862]	Critically Endangered	Species or species habitat known to occur within area
Catharacta skua Great Skua [59472]		Species or species habitat may occur within area
Cereopsis novaehollandiae grisea Cape Barren Goose (south-western), Recherche Cape Barren Goose [25978]	Vulnerable	Breeding known to occur within area
Charadrius leschenaultii Greater Sand Plover, Large Sand Plover [877]	Vulnerable	Species or species habitat known to occur within area
Charadrius mongolus Lesser Sand Plover, Mongolian Plover [879]	Endangered	Species or species habitat known to occur within area
Charadrius ruficapillus Red-capped Plover [881]		Species or species habitat known to occur within area
Chrysococcyx osculans Black-eared Cuckoo [705]		Species or species habitat likely to occur within area
Diomedea amsterdamensis Amsterdam Albatross [64405]	Endangered	Species or species habitat likely to occur within area
Diomedea antipodensis Antipodean Albatross [64458]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea dabbenena Tristan Albatross [66471]	Endangered	Species or species habitat likely to occur within area
Diomedea epomophora Southern Royal Albatross [89221]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea exulans Wandering Albatross [89223]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Diomedea sanfordi Northern Royal Albatross [64456]	Endangered	Foraging, feeding or related behaviour likely to occur within area
Eudyptula minor Little Penguin [1085]		Breeding known to occur within area

Name	Threatened	Type of Presence
Fregata ariel Lesser Frigatebird, Least Frigatebird [1012]	1134	Species or species habitat likely to occur within area
Glareola maldivarum Oriental Pratincole [840]		Species or species habitat known to occur within area
Haliaeetus leucogaster White-bellied Sea-Eagle [943]		Species or species habitat known to occur within area
Halobaena caerulea Blue Petrel [1059]	Vulnerable	Species or species habitat may occur within area
Heteroscelus brevipes Grey-tailed Tattler [59311]		Species or species habitat known to occur within area
Larus novaehollandiae Silver Gull [810]		Breeding known to occur within area
Larus pacificus Pacific Gull [811]		Breeding known to occur within area
Limosa lapponica Bar-tailed Godwit [844]		Species or species habitat known to occur within area
Macronectes giganteus Southern Giant-Petrel, Southern Giant Petrel [1060]	Endangered	Species or species habitat may occur within area
Macronectes halli Northern Giant Petrel [1061]	Vulnerable	Species or species habitat may occur within area
Merops ornatus Rainbow Bee-eater [670]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat likely to occur within area
Pachyptila turtur Fairy Prion [1066]		Species or species habitat known to occur within area
Pandion haliaetus Osprey [952]		Breeding known to occur within area
Pelagodroma marina White-faced Storm-Petrel [1016]		Breeding known to occur within area
Phalacrocorax fuscescens Black-faced Cormorant [59660]		Breeding known to occur within area
Phoebastria fusca Sooty Albatross [1075]	Vulnerable	Species or species habitat likely to occur within area
Pterodroma macroptera Great-winged Petrel [1035]		Breeding known to occur within area
Pterodroma mollis Soft-plumaged Petrel [1036]	Vulnerable	Foraging, feeding or related behaviour likely

Name	Threatened	Type of Presence
Puffinus assimilis Little Shearwater [59363]	1135	to occur within area Breeding known to occur within area
Puffinus carneipes Flesh-footed Shearwater, Fleshy-footed Shearwater [1043]		Breeding known to occur within area
Puffinus griseus Sooty Shearwater [1024]		Species or species habitat may occur within area
Puffinus pacificus Wedge-tailed Shearwater [1027]		Breeding known to occur within area
Puffinus tenuirostris Short-tailed Shearwater [1029]		Breeding known to occur within area
Rostratula benghalensis (sensu lato) Painted Snipe [889]	Endangered*	Species or species habitat known to occur within area
Sterna anaethetus Bridled Tern [814]		Breeding known to occur within area
Sterna bergii Crested Tern [816]		Breeding known to occur within area
Sterna caspia Caspian Tern [59467]		Breeding known to occur within area
Sterna dougallii Roseate Tern [817]		Breeding known to occur within area
Sterna fuscata Sooty Tern [794]		Breeding known to occur within area
Sterna nereis Fairy Tern [796]		Breeding known to occur within area
Thalassarche carteri Indian Yellow-nosed Albatross [64464]	Vulnerable	Foraging, feeding or related behaviour may occur within area
Thalassarche cauta Shy Albatross [89224]	Endangered	Foraging, feeding or related behaviour likely to occur within area
Thalassarche chrysostoma Grey-headed Albatross [66491]	Endangered	Species or species habitat may occur within area
Thalassarche impavida Campbell Albatross, Campbell Black-browed Albatross [64459]	Vulnerable	Species or species habitat may occur within area
Thalassarche melanophris Black-browed Albatross [66472]	Vulnerable	Species or species habitat may occur within area
Thalassarche steadi White-capped Albatross [64462]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Thinornis rubricollis Hooded Plover [59510]		Species or species habitat known to occur within area
Tringa nebularia Common Greenshank, Greenshank [832]		Species or species habitat likely to occur within area

Name	Threatened	Type of Presence
Acentronura australe Southern Pygmy Pipehorse [66185]	1136	Species or species habitat may occur within area
Campichthys galei Gale's Pipefish [66191]		Species or species habitat may occur within area
Choeroichthys suillus Pig-snouted Pipefish [66198]		Species or species habitat may occur within area
Halicampus brocki Brock's Pipefish [66219]		Species or species habitat may occur within area
Heraldia nocturna Upside-down Pipefish, Eastern Upside-down Pipefish, Eastern Upside-down Pipefish [66227]		Species or species habitat may occur within area
Hippocampus angustus Western Spiny Seahorse, Narrow-bellied Seahorse [66234]		Species or species habitat may occur within area
Hippocampus breviceps Short-head Seahorse, Short-snouted Seahorse [66235]		Species or species habitat may occur within area
Hippocampus subelongatus West Australian Seahorse [66722]		Species or species habitat may occur within area
Histiogamphelus cristatus Rhino Pipefish, Macleay's Crested Pipefish, Ring-back Pipefish [66243]		Species or species habitat may occur within area
Leptoichthys fistularius Brushtail Pipefish [66248]		Species or species habitat may occur within area
Lissocampus caudalis Australian Smooth Pipefish, Smooth Pipefish [66249]		Species or species habitat may occur within area
Lissocampus fatiloquus Prophet's Pipefish [66250]		Species or species habitat may occur within area
Lissocampus runa Javelin Pipefish [66251]		Species or species habitat may occur within area
Maroubra perserrata Sawtooth Pipefish [66252]		Species or species habitat may occur within area
Mitotichthys meraculus Western Crested Pipefish [66259]		Species or species habitat may occur within area
Nannocampus subosseus Bonyhead Pipefish, Bony-headed Pipefish [66264]		Species or species habitat may occur within area
Notiocampus ruber Red Pipefish [66265]		Species or species habitat may occur within area
Phycodurus eques Leafy Seadragon [66267]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Phyllopteryx taeniolatus Common Seadragon, Weedy Seadragon [66268]	1137	Species or species habitat may occur within area
Pugnaso curtirostris Pugnose Pipefish, Pug-nosed Pipefish [66269]		Species or species habitat may occur within area
Solegnathus lettiensis Gunther's Pipehorse, Indonesian Pipefish [66273]		Species or species habitat may occur within area
Stigmatopora argus Spotted Pipefish, Gulf Pipefish, Peacock Pipefish [66276]		Species or species habitat may occur within area
Stigmatopora nigra Widebody Pipefish, Wide-bodied Pipefish, Black Pipefish [66277]		Species or species habitat may occur within area
Syngnathoides biaculeatus Double-end Pipehorse, Double-ended Pipehorse, Alligator Pipefish [66279]		Species or species habitat may occur within area
Urocampus carinirostris Hairy Pipefish [66282]		Species or species habitat may occur within area
Vanacampus margaritifer Mother-of-pearl Pipefish [66283]		Species or species habitat may occur within area
Vanacampus phillipi Port Phillip Pipefish [66284]		Species or species habitat may occur within area
Vanacampus poecilolaemus Longsnout Pipefish, Australian Long-snout Pipefish, Long-snouted Pipefish [66285]		Species or species habitat may occur within area
Mammals		
Arctocephalus forsteri Long-nosed Fur-seal, New Zealand Fur-seal [20]		Breeding known to occur within area
Neophoca cinerea Australian Sea-lion, Australian Sea Lion [22]	Endangered	Breeding known to occur within area
Reptiles		
Aipysurus laevis Olive Seasnake [1120]		Species or species habitat may occur within area
Aipysurus pooleorum Shark Bay Seasnake [66061]		Species or species habitat may occur within area
Caretta caretta Loggerhead Turtle [1763]	Endangered	Foraging, feeding or related behaviour known to occur within area
Chelonia mydas Green Turtle [1765]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Dermochelys coriacea Leatherback Turtle, Leathery Turtle, Luth [1768]	Endangered	Foraging, feeding or related behaviour known to occur within area
Disteira kingii Spectacled Seasnake [1123]		Species or species habitat may occur within area

Name	Threatened	Type of Presence
Disteira major Olive-headed Seasnake [1124]	1138	Species or species habitat may occur within area
Ephalophis greyi North-western Mangrove Seasnake [1127]		Species or species habitat may occur within area
Natator depressus Flatback Turtle [59257]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Pelamis platurus Yellow-bellied Seasnake [1091]		Species or species habitat may occur within area
Whales and other Cetaceans		
[Resource Information]		
Name	Status	Type of Presence
Mammals		
Balaenoptera acutorostrata Minke Whale [33]		Species or species habitat may occur within area
Balaenoptera bonaerensis Antarctic Minke Whale, Dark-shoulder Minke Whale [67812]		Species or species habitat likely to occur within area
Balaenoptera borealis Sei Whale [34]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Balaenoptera edeni Bryde's Whale [35]		Species or species habitat likely to occur within area
Balaenoptera musculus Blue Whale [36]	Endangered	Migration route known to occur within area
Balaenoptera physalus Fin Whale [37]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area
Berardius arnuxii Arnoux's Beaked Whale [70]		Species or species habitat may occur within area
Caperea marginata Pygmy Right Whale [39]		Foraging, feeding or related behaviour may occur within area
Delphinus delphis Common Dolphin, Short-beaked Common Dolphin [60]		Species or species habitat may occur within area
Eubalaena australis Southern Right Whale [40]	Endangered	Breeding known to occur within area
Feresa attenuata Pygmy Killer Whale [61]		Species or species habitat may occur within area
Globicephala macrorhynchus Short-finned Pilot Whale [62]		Species or species habitat may occur within area
Globicephala melas Long-finned Pilot Whale [59282]		Species or species habitat may occur within area
Grampus griseus Risso's Dolphin, Grampus [64]		Species or species habitat may occur within

Name	Status	Type of Presence
Hyperoodon planifrons Southern Bottlenose Whale [71]	1139	area Species or species habitat may occur within area
Kogia breviceps Pygmy Sperm Whale [57]		Species or species habitat may occur within area
Kogia simus Dwarf Sperm Whale [58]		Species or species habitat may occur within area
Lagenodelphis hosei Fraser's Dolphin, Sarawak Dolphin [41]		Species or species habitat may occur within area
Lagenorhynchus obscurus Dusky Dolphin [43]		Species or species habitat likely to occur within area
Lissodelphis peronii Southern Right Whale Dolphin [44]		Species or species habitat may occur within area
Megaptera novaeangliae Humpback Whale [38]	Vulnerable	Foraging, feeding or related behaviour known to occur within area
Mesoplodon bowdoini Andrew's Beaked Whale [73]		Species or species habitat may occur within area
Mesoplodon densirostris Blainville's Beaked Whale, Dense-beaked Whale [74]		Species or species habitat may occur within area
Mesoplodon ginkgodens Ginkgo-toothed Beaked Whale, Ginkgo-toothed Whale, Ginkgo Beaked Whale [59564]		Species or species habitat may occur within area
Mesoplodon grayi Gray's Beaked Whale, Scamperdown Whale [75]		Species or species habitat may occur within area
Mesoplodon hectori Hector's Beaked Whale [76]		Species or species habitat may occur within area
Mesoplodon layardii Strap-toothed Beaked Whale, Strap-toothed Whale, Layard's Beaked Whale [25556]		Species or species habitat may occur within area
Mesoplodon mirus True's Beaked Whale [54]		Species or species habitat may occur within area
Orcinus orca Killer Whale, Orca [46]		Species or species habitat may occur within area
Peponocephala electra Melon-headed Whale [47]		Species or species habitat may occur within area
Physeter macrocephalus Sperm Whale [59]		Foraging, feeding or related behaviour known to occur within area
Pseudorca crassidens False Killer Whale [48]		Species or species habitat likely to occur within area

Name	Status	Type of Presence
Stenella attenuata	1140	
Spotted Dolphin, Pantropical Spotted Dolphin [51]		Species or species habitat may occur within area
Stenella coeruleoalba		
Striped Dolphin, Euphrosyne Dolphin [52]		Species or species habitat may occur within area
Stenella longirostris		
Long-snouted Spinner Dolphin [29]		Species or species habitat may occur within area
Steno bredanensis		
Rough-toothed Dolphin [30]		Species or species habitat may occur within area
Tasmacetus shepherdi		
Shepherd's Beaked Whale, Tasman Beaked Whale [55]		Species or species habitat may occur within area
Tursiops aduncus		
Indian Ocean Bottlenose Dolphin, Spotted Bottlenose Dolphin [68418]		Species or species habitat likely to occur within area
Tursiops truncatus s. str.		
Bottlenose Dolphin [68417]		Species or species habitat may occur within area
Ziphius cavirostris		
Cuvier's Beaked Whale, Goose-beaked Whale [56]		Species or species habitat may occur within area

Australian Marine Parks		[Resource Information]
Name		Label
Abrolhos		Habitat Protection Zone (IUCN IV)
Abrolhos		Multiple Use Zone (IUCN VI)
Abrolhos		Special Purpose Zone (IUCN VI)
Bremer		National Park Zone (IUCN II)
Bremer		Special Purpose Zone (Mining)
Eastern Recherche		National Park Zone (IUCN II)
Eastern Recherche		Special Purpose Zone (IUCN VI)
Geographe		Habitat Protection Zone (IUCN IV)
Geographe		Multiple Use Zone (IUCN VI)
Geographe		National Park Zone (IUCN II)
Geographe		Special Purpose Zone (Mining)
Great Australian Bight		Special Purpose Zone (Mining)
Jurien		Special Purpose Zone (IUCN VI)
South-west Corner		Habitat Protection Zone (IUCN IV)
South-west Corner		Multiple Use Zone (IUCN VI)
South-west Corner		National Park Zone (IUCN II)
South-west Corner		Special Purpose Zone (IUCN VI)
South-west Corner		Special Purpose Zone (Mining)
Twilight		National Park Zone (IUCN II)
Twilight		Special Purpose Zone (Mining)
Two Rocks		Multiple Use Zone (IUCN VI)

State and Territory Reserves		[Resource Information]
Name	State	
Bald Island	WA	
Boullanger, Whitlock, Favourite, Tern And Osprey Islands	WA	
Eclipse Island	WA	
Escape Island	WA	
Flinders Bay	WA	
Penguin Island	WA	
Recherche Archipelago	WA	
St Alouarn Island	WA	
Unnamed WA44682	WA	
Unnamed WA48968	WA	

Invasive Species [Resource Information]

Weeds reported here are the 20 species of national significance (WoNS), along with other introduced plants that are considered by the States and Territories to pose a particularly significant threat to biodiversity. The following feral animals are reported: Goat, Red Fox, Cat, Rabbit, Pig, Water Buffalo and Cane Toad. Maps from Landscape Health Project, National Land and Water Resources Audit, 2001.

Name	Status	Type of Presence
Birds		
Acridotheres tristis Common Myna, Indian Myna [387]		Species or species habitat likely to occur within area
Anas platyrhynchos Mallard [974]		Species or species habitat likely to occur within area
Carduelis carduelis European Goldfinch [403]		Species or species habitat likely to occur within area
Columba livia Rock Pigeon, Rock Dove, Domestic Pigeon [803]		Species or species habitat likely to occur within area
Passer domesticus House Sparrow [405]		Species or species habitat likely to occur within area
Passer montanus Eurasian Tree Sparrow [406]		Species or species habitat likely to occur within area
Streptopelia chinensis Spotted Turtle-Dove [780]		Species or species habitat likely to occur within area
Streptopelia senegalensis Laughing Turtle-dove, Laughing Dove [781]		Species or species habitat likely to occur within area
Sturnus vulgaris Common Starling [389]		Species or species habitat likely to occur within area
Turdus merula Common Blackbird, Eurasian Blackbird [596]		Species or species habitat likely to occur within area
Mammals		
Bos taurus Domestic Cattle [16]		Species or species habitat likely to occur within area

Name	Status	Type of Presence
Canis lupus familiaris Domestic Dog [82654]	1142	Species or species habitat likely to occur within area
Felis catus Cat, House Cat, Domestic Cat [19]		Species or species habitat likely to occur within area
Feral deer Feral deer species in Australia [85733]		Species or species habitat likely to occur within area
Funambulus pennantii Northern Palm Squirrel, Five-striped Palm Squirrel [129]		Species or species habitat likely to occur within area
Mus musculus House Mouse [120]		Species or species habitat likely to occur within area
Oryctolagus cuniculus Rabbit, European Rabbit [128]		Species or species habitat likely to occur within area
Rattus norvegicus Brown Rat, Norway Rat [83]		Species or species habitat likely to occur within area
Rattus rattus Black Rat, Ship Rat [84]		Species or species habitat likely to occur within area
Sus scrofa Pig [6]		Species or species habitat likely to occur within area
Vulpes vulpes Red Fox, Fox [18]		Species or species habitat likely to occur within area
Plants		
Anredera cordifolia Madeira Vine, Jalap, Lamb's-tail, Mignonette Vine, Anredera, Gulf Madeiravine, Heartleaf Madeiravine, Potato Vine [2643]		Species or species habitat likely to occur within area
Asparagus aethiopicus Asparagus Fern, Ground Asparagus, Basket Fern, Sprengi's Fern, Bushy Asparagus, Emerald Asparagus [62425]		Species or species habitat likely to occur within area
Asparagus asparagoides Bridal Creeper, Bridal Veil Creeper, Smilax, Florist's Smilax, Smilax Asparagus [22473]		Species or species habitat likely to occur within area
Asparagus plumosus Climbing Asparagus-fern [48993]		Species or species habitat likely to occur within area
Brachiaria mutica Para Grass [5879]		Species or species habitat may occur within area
Cenchrus ciliaris Buffel-grass, Black Buffel-grass [20213]		Species or species habitat may occur within area
Chrysanthemoides monilifera Bitou Bush, Boneseed [18983]		Species or species habitat may occur within area
Chrysanthemoides monilifera subsp. monilifera Boneseed [16905]		Species or species habitat likely to occur within area

Name	Status	Type of Presence
Genista linifolia Flax-leaved Broom, Mediterranean Broom, Flax Broom [2800]	1143	Species or species habitat likely to occur within area
Genista sp. X Genista monspessulana Broom [67538]		Species or species habitat may occur within area
Lantana camara Lantana, Common Lantana, Kamara Lantana, Large-leaf Lantana, Pink Flowered Lantana, Red Flowered Lantana, Red-Flowered Sage, White Sage, Wild Sage [10892] Lycium ferocissimum African Boxthorn, Boxthorn [19235]		Species or species habitat likely to occur within area
Olea europaea Olive, Common Olive [9160]		Species or species habitat may occur within area
Opuntia spp. Prickly Pears [82753]		Species or species habitat likely to occur within area
Pinus radiata Radiata Pine Monterey Pine, Insignis Pine, Wilding Pine [20780]		Species or species habitat may occur within area
Rubus fruticosus aggregate Blackberry, European Blackberry [68406]		Species or species habitat likely to occur within area
Sagittaria platyphylla Delta Arrowhead, Arrowhead, Slender Arrowhead [68483]		Species or species habitat likely to occur within area
Salix spp. except S.babylonica, S.x calodendron & S.x reichardtii Willows except Weeping Willow, Pussy Willow and Sterile Pussy Willow [68497]		Species or species habitat likely to occur within area
Salvinia molesta Salvinia, Giant Salvinia, Aquarium Watermoss, Kariba Weed [13665]		Species or species habitat likely to occur within area
Tamarix aphylla Athel Pine, Athel Tree, Tamarisk, Athel Tamarisk, Athel Tamarix, Desert Tamarisk, Flowering Cypress, Salt Cedar [16018]		Species or species habitat likely to occur within area
Reptiles		
Hemidactylus frenatus Asian House Gecko [1708]		Species or species habitat likely to occur within area

Key Ecological Features (Marine) [Resource Information]

Key Ecological Features are the parts of the marine ecosystem that are considered to be important for the biodiversity or ecosystem functioning and integrity of the Commonwealth Marine Area.

Name	Region
Ancient coastline at 90-120m depth	South-west
Commonwealth marine environment surrounding	South-west
Commonwealth marine environment within and	South-west
Commonwealth marine environment within and	South-west
Diamantina Fracture Zone	South-west
Naturaliste Plateau	South-west
Western demersal slope and associated fish	South-west
Western rock lobster	South-west

Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

Coordinates

-25.765206 109.237891,-25.725623 109.501563,-25.992551 109.732276,-25.992551 109.875098,-26.071525 110.182716,-26.229314
 110.325538,-25.656321 112.127296,-27.717513 112.984229,-27.814726 114.02793,-28.202708 114.159766,-28.483117 114.445411,-28.695347
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 116.060401,-35.106373 116.598731,-35.11536 117.389747,-35.169263 117.774268,-35.169263 118.081885,-34.980447 118.312598,-34.402321
 119.663917,-34.30255 119.56504,-34.029844 119.883643,-33.938746 120.960303,-33.911398 121.399757,-34.011632 121.949073,-34.102652
 122.476417,-34.038948 123.432227,-33.591687 124.091407,-33.10529 124.212257,-32.902593 125.014258,-32.319576 126.134864,-32.375265
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 120.817481,-38.46644 118.664161,-38.337294 115.697852,-37.418109 113.368751,-36.584603 112.028419,-34.998448 111.061622,-33.545916
 110.973731,-31.984725 111.512061,-31.414542 111.270362,-30.026241 110.182716,-28.396173 109.798194,-27.756409 109.875098,-25.765206
 109.237891,-25.765206 109.237891

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [Office of Environment and Heritage, New South Wales](#)
- [Department of Environment and Primary Industries, Victoria](#)
- [Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [Department of Environment, Water and Natural Resources, South Australia](#)
- [Department of Land and Resource Management, Northern Territory](#)
- [Department of Environmental and Heritage Protection, Queensland](#)
- [Department of Parks and Wildlife, Western Australia](#)
- [Environment and Planning Directorate, ACT](#)
- [Birdlife Australia](#)
- [Australian Bird and Bat Banding Scheme](#)
- [Australian National Wildlife Collection](#)
- Natural history museums of Australia
- [Museum Victoria](#)
- [Australian Museum](#)
- [South Australian Museum](#)
- [Queensland Museum](#)
- [Online Zoological Collections of Australian Museums](#)
- [Queensland Herbarium](#)
- [National Herbarium of NSW](#)
- [Royal Botanic Gardens and National Herbarium of Victoria](#)
- [Tasmanian Herbarium](#)
- [State Herbarium of South Australia](#)
- [Northern Territory Herbarium](#)
- [Western Australian Herbarium](#)
- [Australian National Herbarium, Canberra](#)
- [University of New England](#)
- [Ocean Biogeographic Information System](#)
- [Australian Government, Department of Defence Forestry Corporation, NSW](#)
- [Geoscience Australia](#)
- [CSIRO](#)
- [Australian Tropical Herbarium, Cairns](#)
- [eBird Australia](#)
- [Australian Government – Australian Antarctic Data Centre](#)
- [Museum and Art Gallery of the Northern Territory](#)
- [Australian Government National Environmental Science Program](#)
- [Australian Institute of Marine Science](#)
- [Reef Life Survey Australia](#)
- [American Museum of Natural History](#)
- [Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact Us](#) page.

APPENDIX B. SUPPORTING FIGURES FOR SECTION 2.3 METEOROLOGY AND OCEANOGRAPHY

Browse

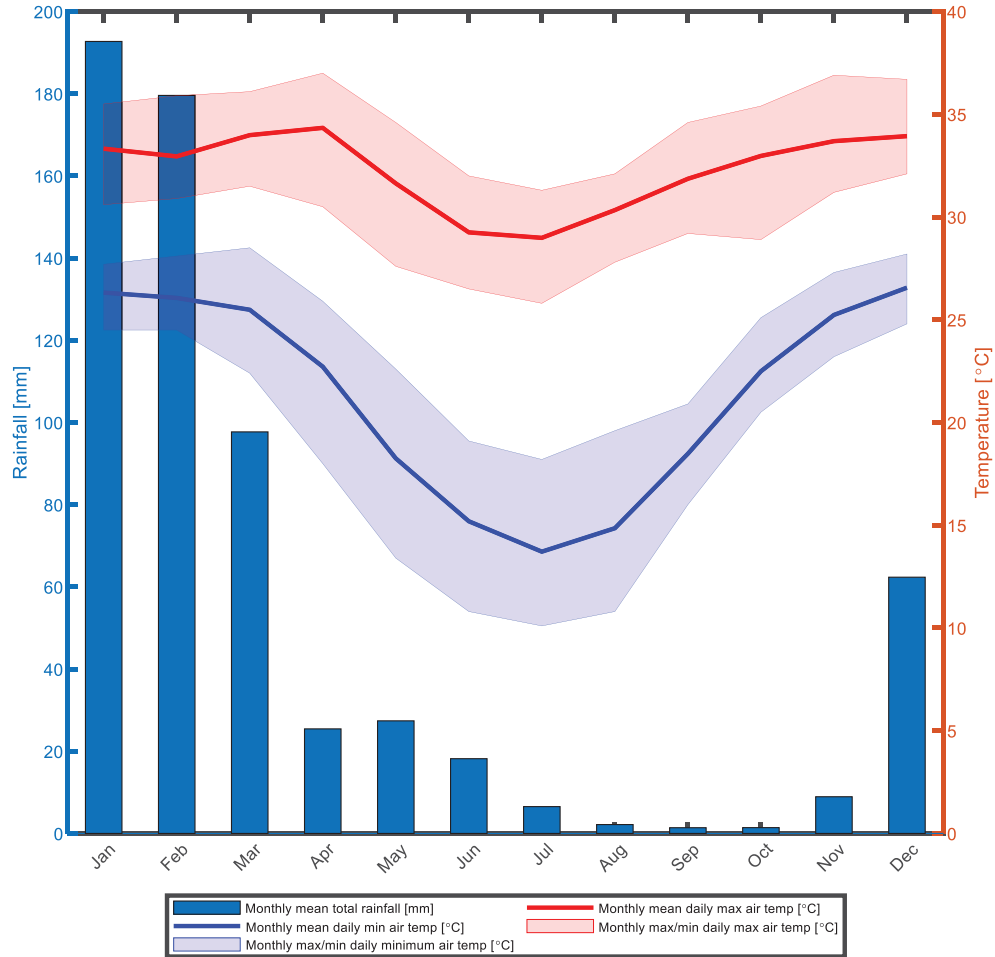
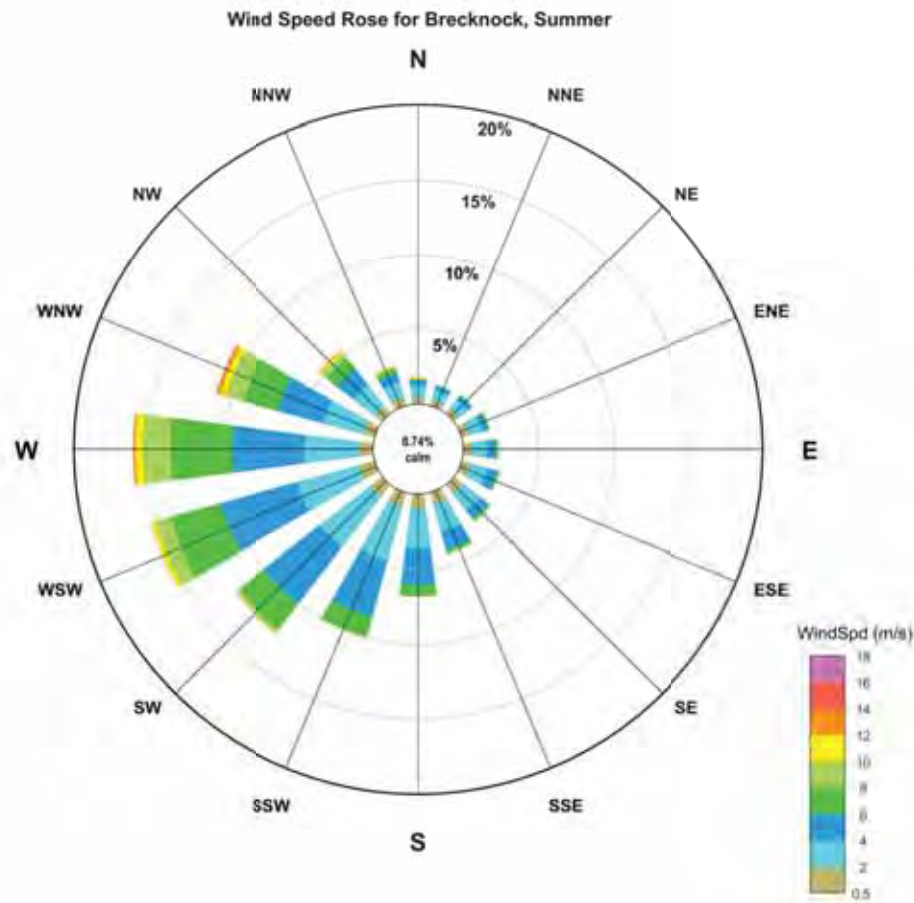


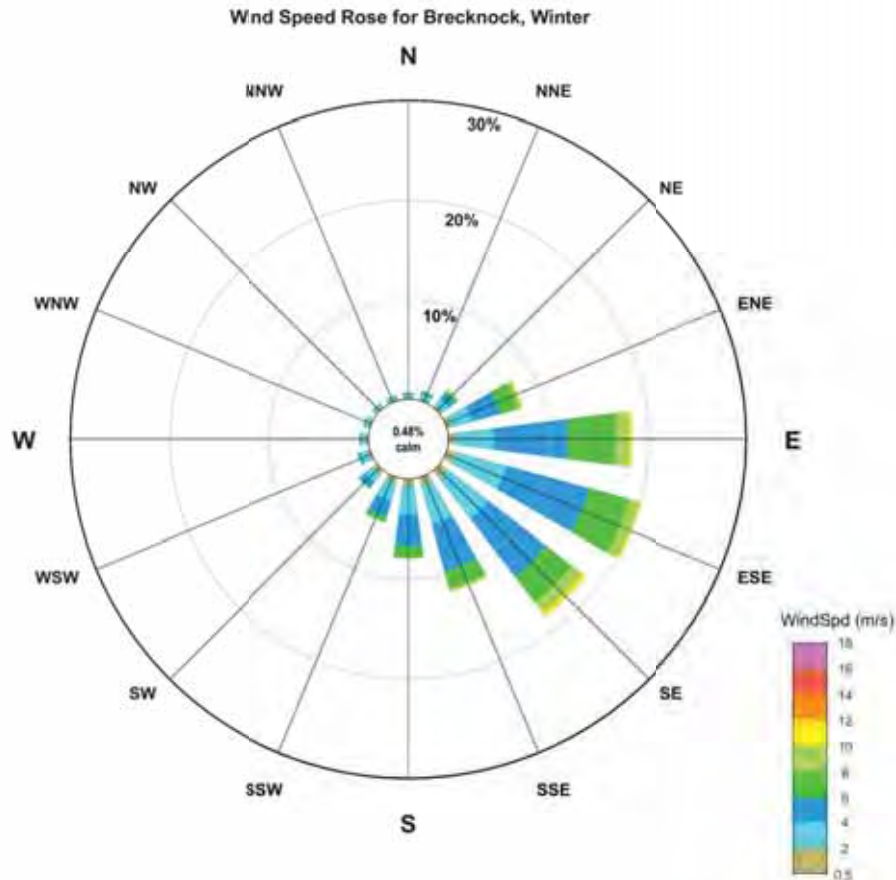
Figure 1. Monthly average total rainfall [mm] and air temperature [°C], calculated based on observations at the Broome Airport weather station from 1939-2020 (Bureau of Meteorology 2020). Bars show the monthly average total rainfall values, and thick blue and red lines denote monthly average daily minimum and maximum air temperatures, respectively. Shaded blue and red areas denote monthly recorded extremes of daily minimum and maximum air temperature, respectively.



Data Information:	Key Statistics for Data Shown:
Project: Browse	Max Wind Speed: 20.60 m/s
Location: Brecknock [121.6500°E, 14.5300°S]	Mean Wind Speed: 4.55 m/s
Data Period: Summer (01-Jan-1979 to 01-Jan-2019)	StdDev. Wind Speed: 2.31 m/s
Data Source: Modelled Hindcast	
Record Elevation: 10 m AMSL	
Local Water Depth (m): 560	
Data Summary: Summer	
Number of Records: 164812	
Missing Data (%): 5.80	
Calm (% < 0.50m/s): 0.74	
Measurement Format: 10-minute avg.	



Figure 2. Summer distributions of 10-minute average wind speeds by 22.5° directional sectors at the Brecknock site (Metocean Solutions Ltd, 2019). Note tropical cyclone events were not included in this distribution. Winds at Brecknock in summer are predominantly from the WNW to SW due to the North West Monsoon (WEL, 2019).



Data Information:	Key Statistics for Data Shown:
Project: Browse	Max Wind Speed: 14.34 m/s
Location: Brecknock (121.6500°E, 14.5300°S)	Mean Wind Speed: 4.71 m/s
Data Period: Winter (01-Apr-1979 to 30-Sep-2018)	StdDev. Wind Speed: 2.01 m/s
Data Source: Modelled Hindcast	
Record Elevation: 10 m AMSL	
Local Water Depth (m): 560	
Data Summary: Winter	
Number of Records: 173751	
Missing Data (%): 1.10	
Calm (% < 0.50m/s): 0.48	
Measurement Format: 10-minute avg.	



Figure 3. Winter distributions of 10-minute average wind speeds by 22.5° directional sectors at the Brecknock site (Metocean Solutions Ltd, 2019). Note tropical cyclone events were not included in this distribution. Winds at Brecknock in winter are predominantly from the E to SE due to the South East Trade Winds coming from the Australian mainland (WEL, 2019).

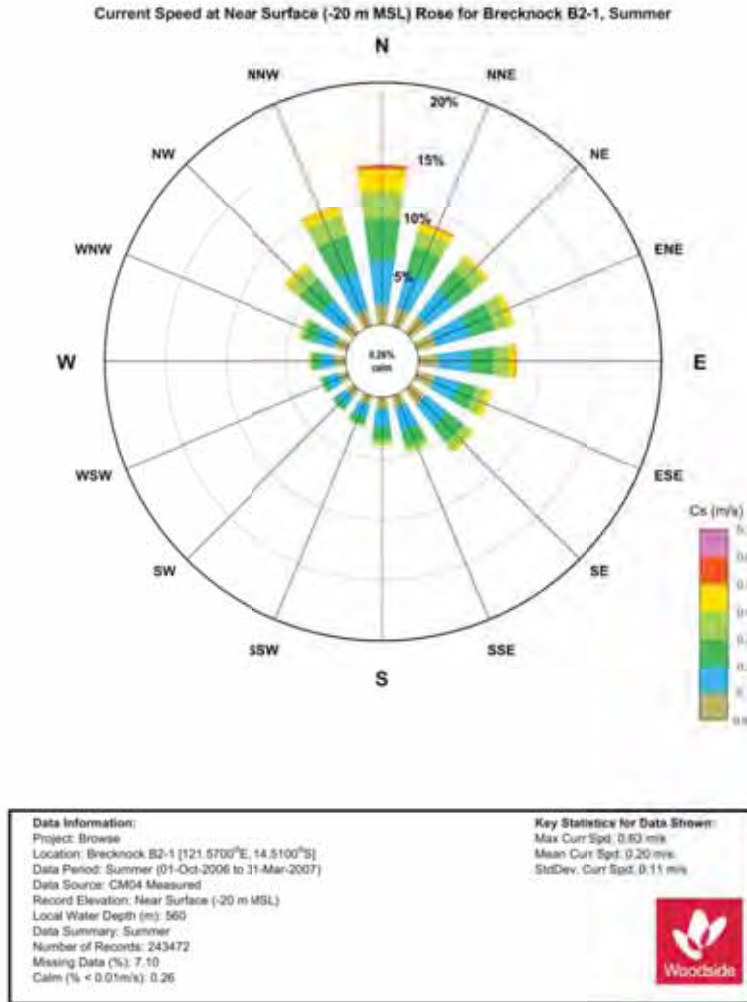


Figure 4. Summer (Nov-Apr) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at Brecknock B2-1 location (cyclones removed) (RPS Metocean Ltd. 2008).

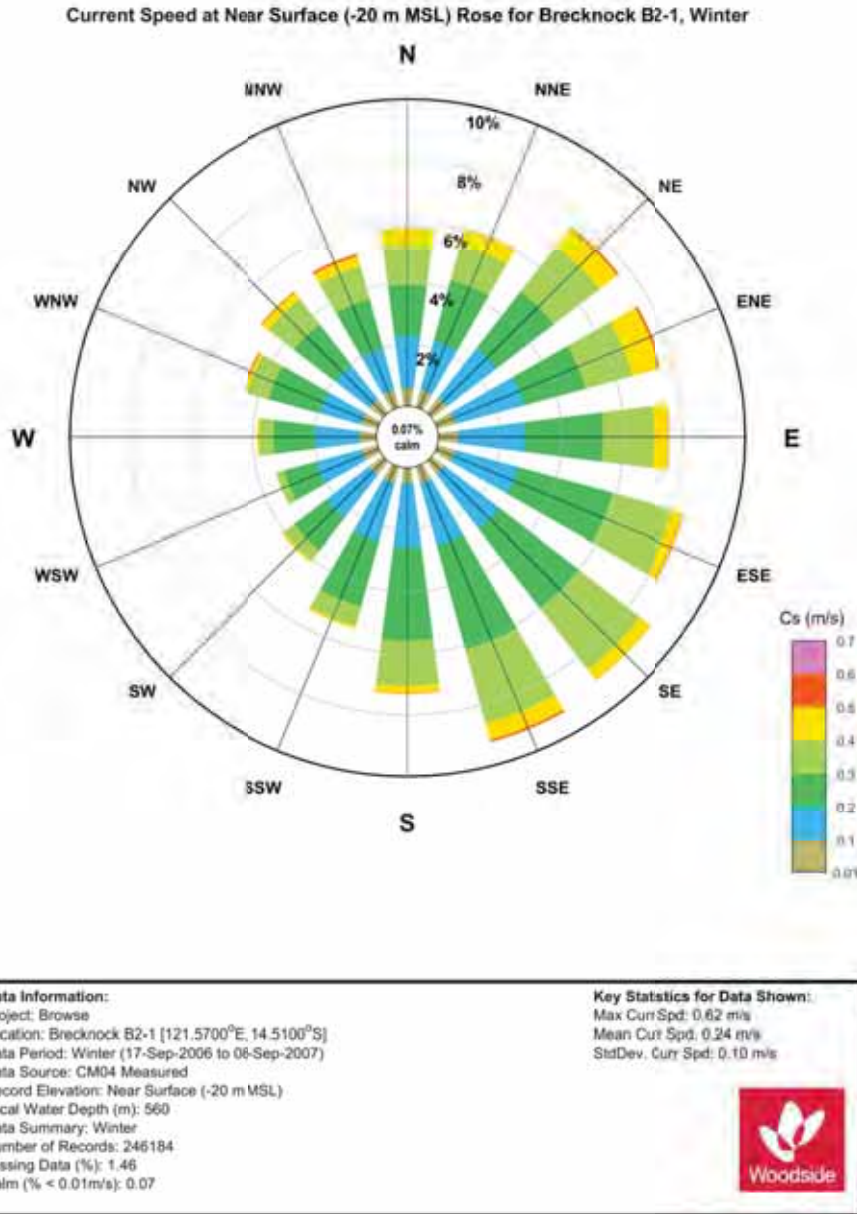


Figure 5. Winter (May-Sep) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at Brecknock B2-1 location (cyclones removed) (RPS Metocean Ltd. 2008).

North-west Shelf/Scarborough

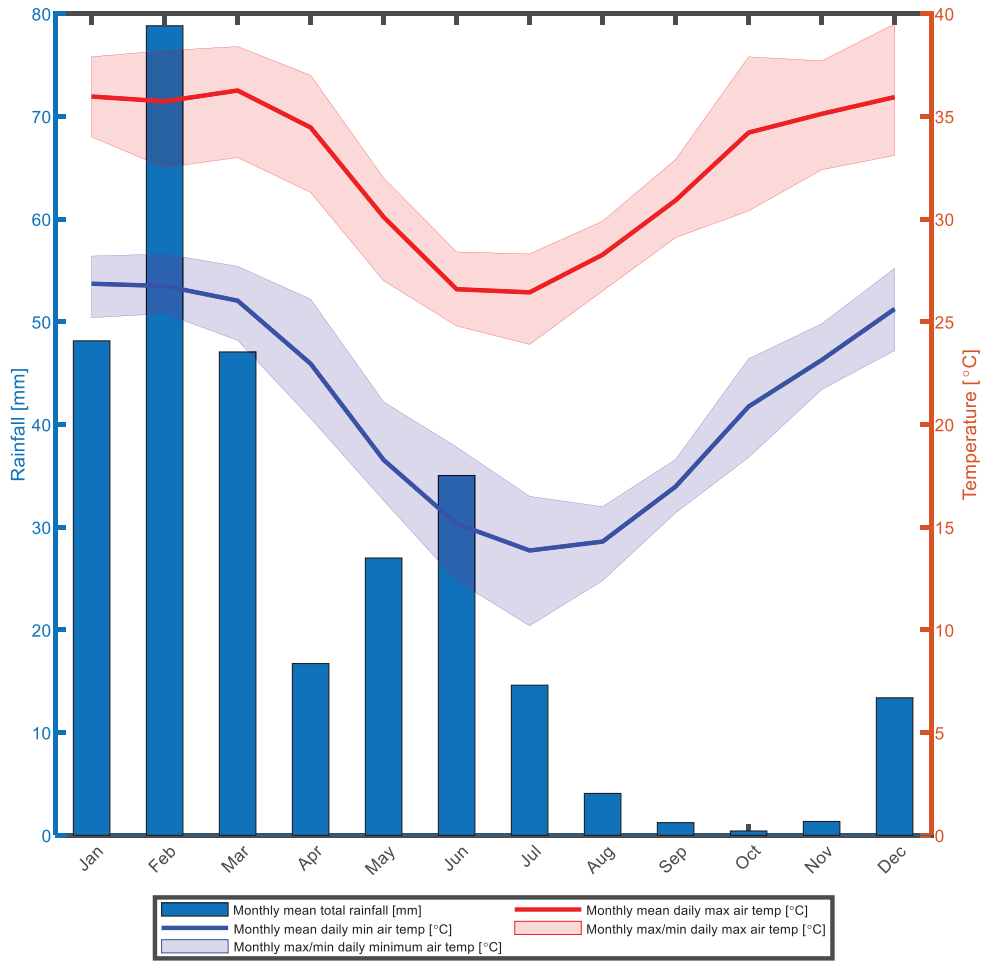


Figure 1. Monthly average total rainfall [mm] and air temperature [°C], calculated based on observations at the Karratha Aero weather station from 1972-2020 and 1993-2020 respectively (Bureau of Meteorology 2020). Bars show the monthly average total rainfall values, and thick blue and red lines denote monthly average daily minimum and maximum air temperatures, respectively. Shaded blue and red areas denote monthly recorded extremes of daily minimum and maximum air temperature, respectively.

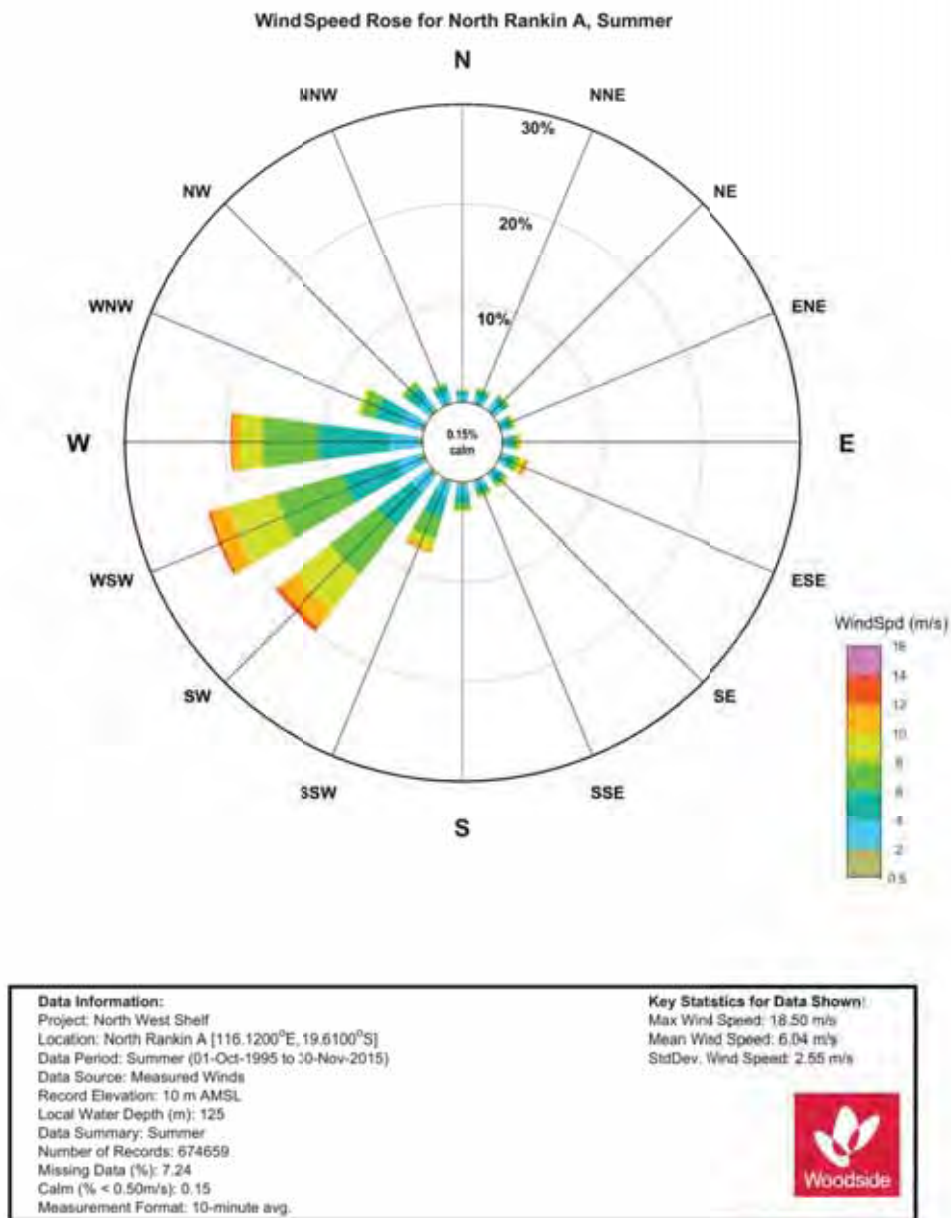
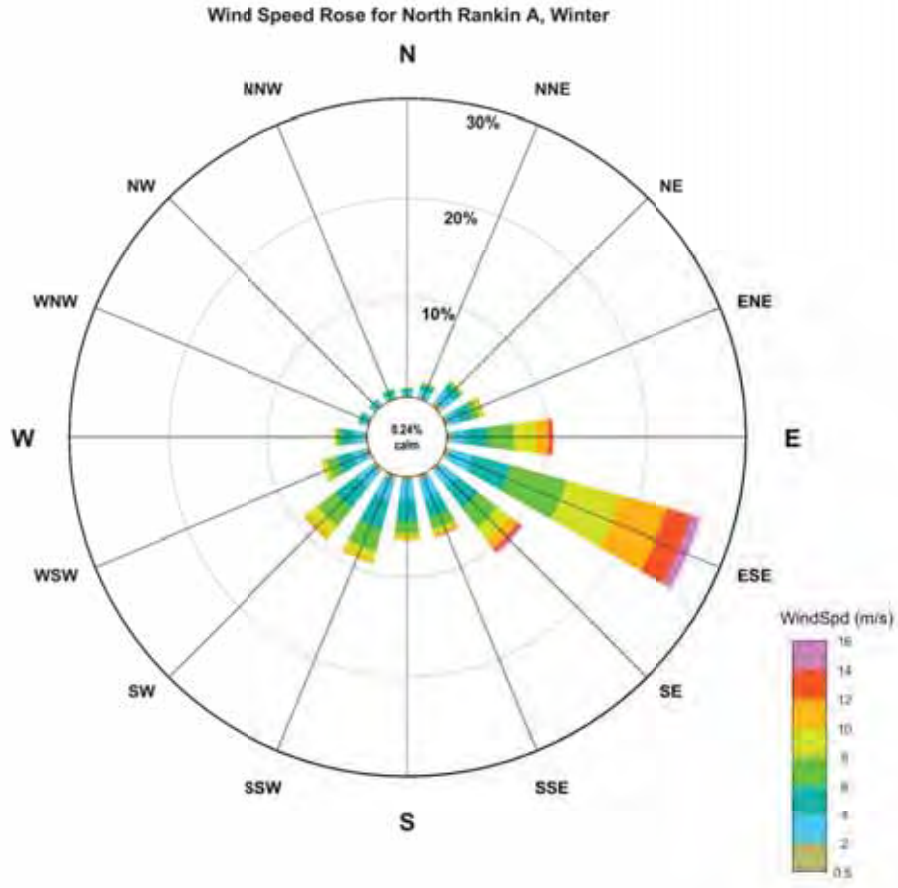


Figure 2. Summer distributions of 10-minute average wind speeds by 22.5° directional sectors at the North Rankin A site (WEL, 2015). Note tropical cyclone events were not included in this distribution. Winds at North Rankin A in summer are characterised by W to SW driven by the North West Monsoon (RPS, 2016).



<p>Data Information: Project: North West Shelf Location: North Rankin A [116.1200°E, 19.6100°S] Data Period: Winter (22-Jun-1995 to 30-Sep-2015) Data Source: Measured Winds Record Elevation: 10 m AMSL Local Water Depth (m): 125 Data Summary: Winter Number of Records: 673213 Missing Data (%): 4.43 Calm (% < 0.50m/s): 0.24 Measurement Format: 10-minute avg.</p>	<p>Key Statistics for Data Shown: Max Wind Speed: 24.23 m/s Mean Wind Speed: 6.25 m/s StdDev. Wind Speed: 3.16 m/s</p>
--	--




Figure 3. Winter distributions of 10-minute average wind speeds by 22.5° directional sectors at the North Rankin A site (WEL, 2015). Note tropical cyclone events were not included in this distribution. Winds at North Rankin in winter are predominantly influenced by the South East Trade Winds over Australia (RPS, 2016).

Scarborough

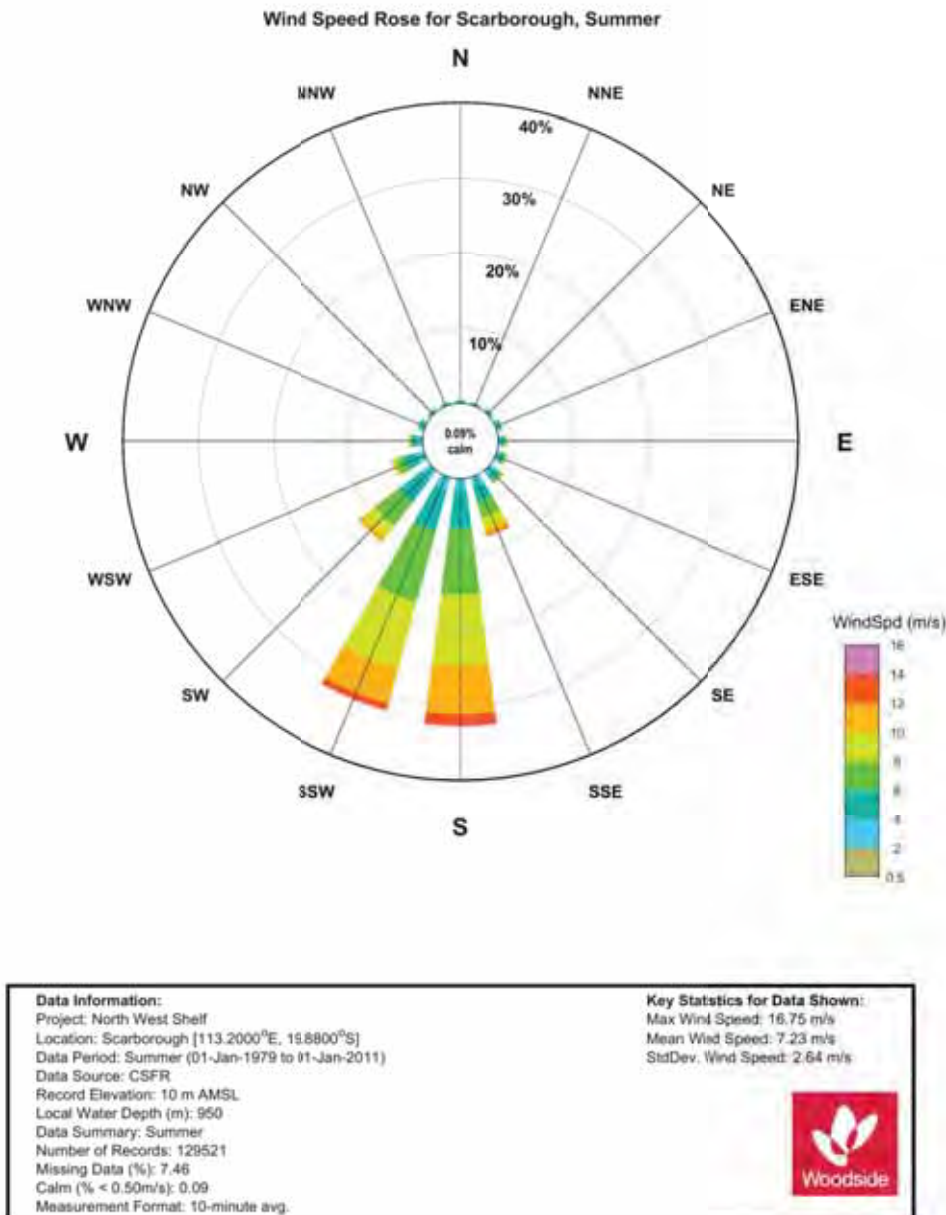
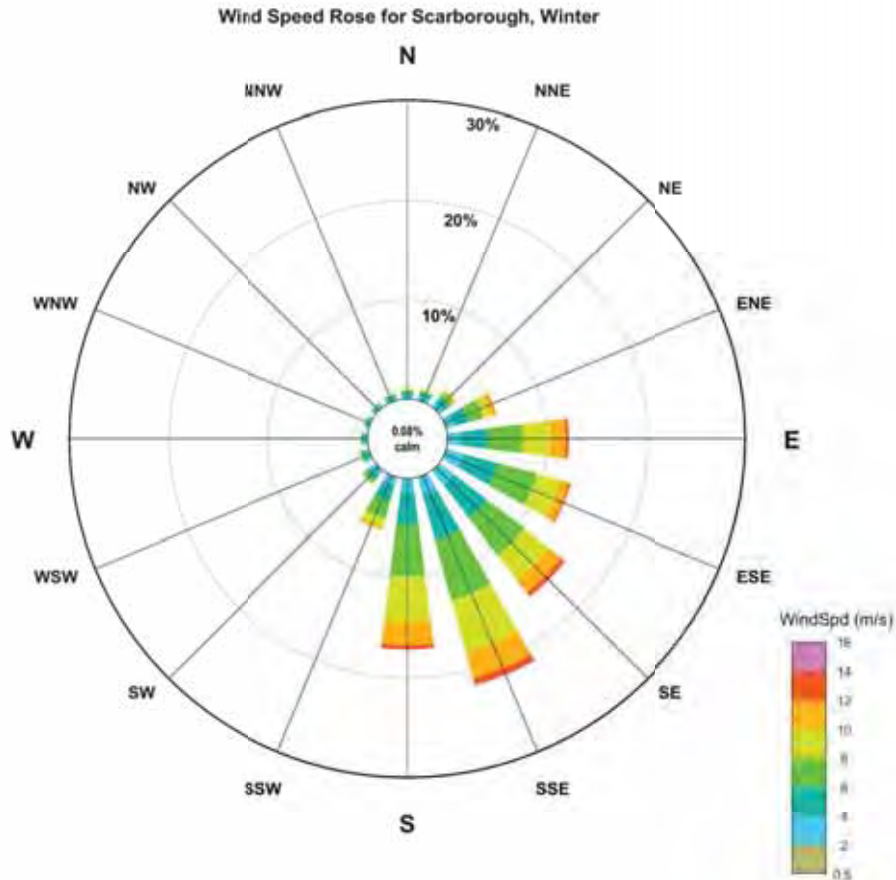


Figure 4. Summer distributions of wind speeds (10-minute at 10m ASL) by 22.5° directional sectors at the Scarborough site (WEL, 2018). Note tropical cyclone events were not included in this distribution. Winds at Scarborough in summer are predominantly from the S to SSW due to a Pilbara Heat Low forming over the northwest coast of Western Australia [R8] SW winds are also experienced at this site due to the monsoon trough.



Data Information:	Key Statistics for Data Shown:
Project: North West Shelf	Max Wind Speed: 19.15 m/s
Location: Scarborough [113.2000°E, 15.8800°S]	Mean Wind Speed: 6.90 m/s
Data Period: Winter (01-Apr-1979 to 30-Sep-2010)	StdDev. Wind Speed: 2.57 m/s
Data Source: CSFR	
Record Elevation: 10 m AMSL	
Local Water Depth (m): 950	
Data Summary: Winter	
Number of Records: 138863	
Missing Data (%): 1.20	
Calm (% < 0.50m/s): 0.08	
Measurement Format: 10-minute avg.	



Figure 5. Winter distributions of wind speeds (10-minute at 10 m ASL) by 22.5° directional sectors at the Scarborough site (WEL, 2018). Note tropical cyclone events were not included in this distribution. Winds at Scarborough in winter are predominantly from the S to E driven by the South East Trade Winds over Australia (RPS, 2016).

North-west Shelf

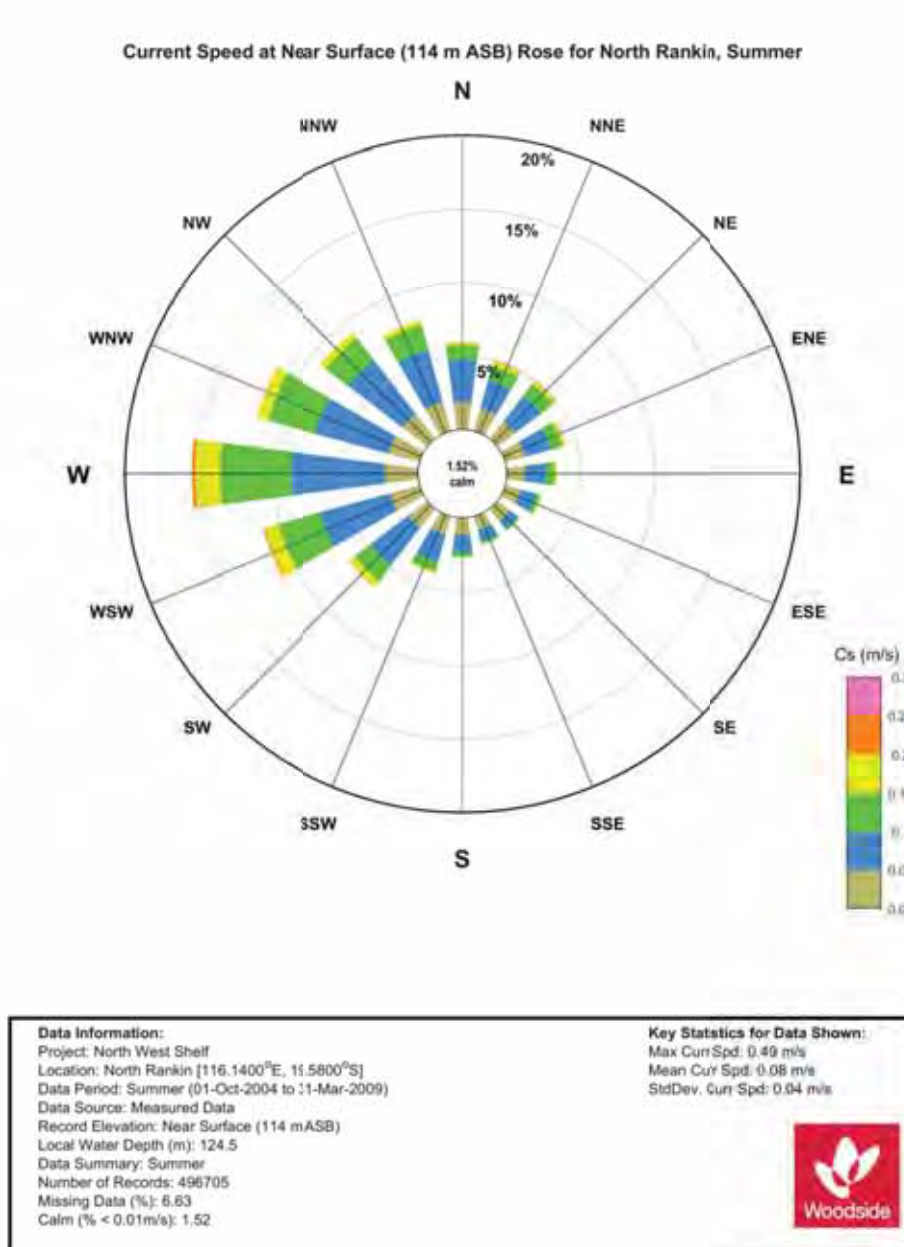


Figure 6. Summer (Nov-Apr) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at the North Rankin location (cyclones removed) (WEL, 2011).

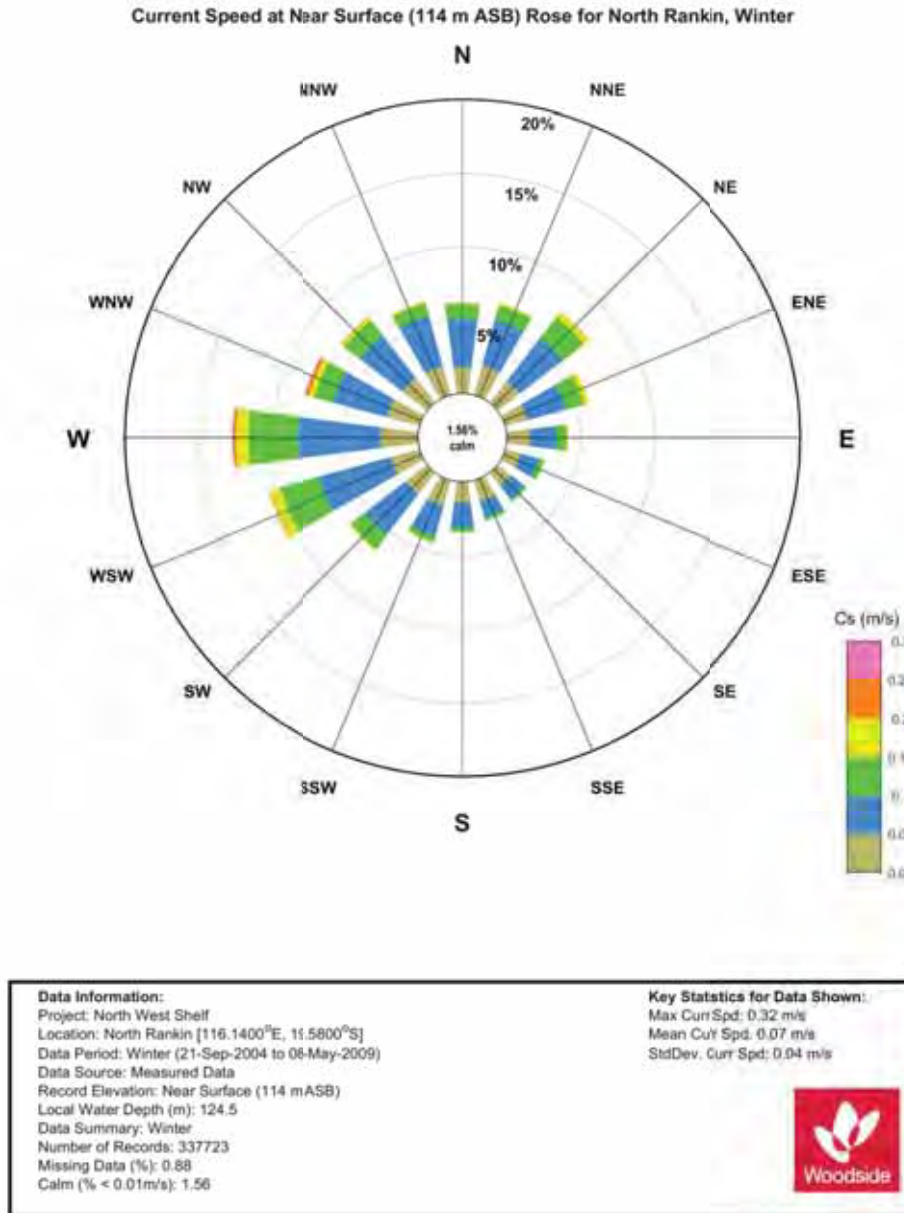
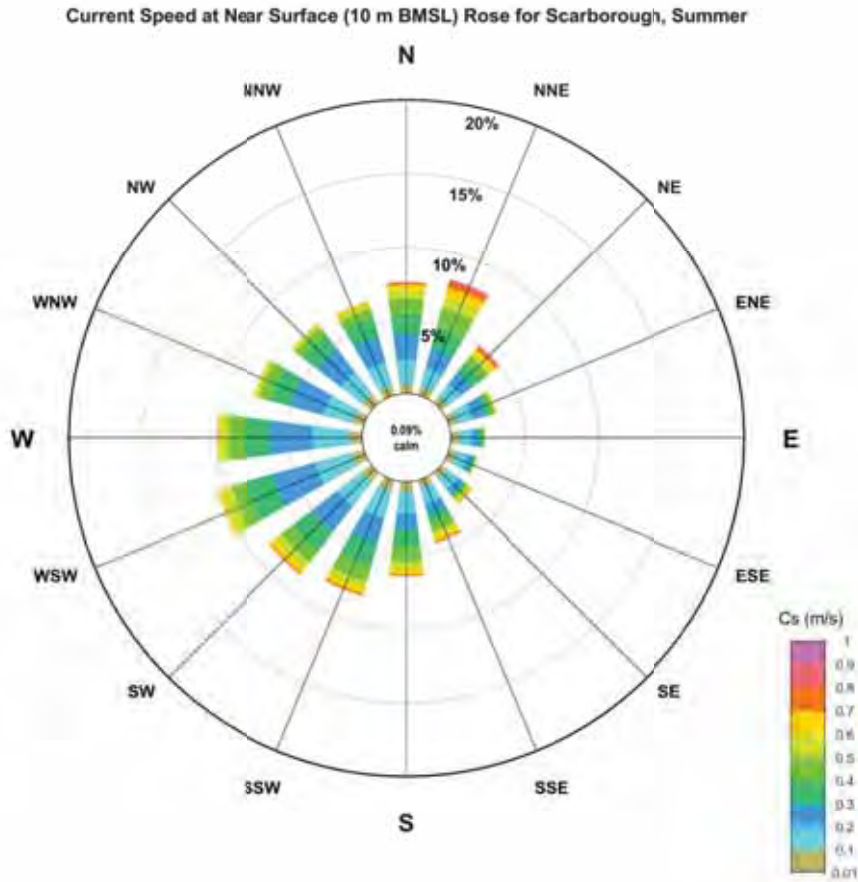


Figure 7. Winter (May-Sep) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at the North Rankin location (cyclones removed) (WEL, 2011).

Scarborough



<p>Data Information: Project: North West Shelf Location: Scarborough [113.2000°E, 19.8800°S] Data Period: Summer (15-Jan-2010 to 29-Feb-2012) Data Source: Measured Data Record Elevation: Near Surface (10 m BMSL) Local Water Depth (m): 950 Data Summary: Summer Number of Records: 43600 Missing Data (%): 7.11 Calm (% < 0.01m/s): 0.09</p>	<p>Key Statistics for Data Shown: Max Curr Spd: 1.03 m/s Mean Curr Spd: 0.29 m/s StdDev. Curr Spd: 0.17 m/s</p>
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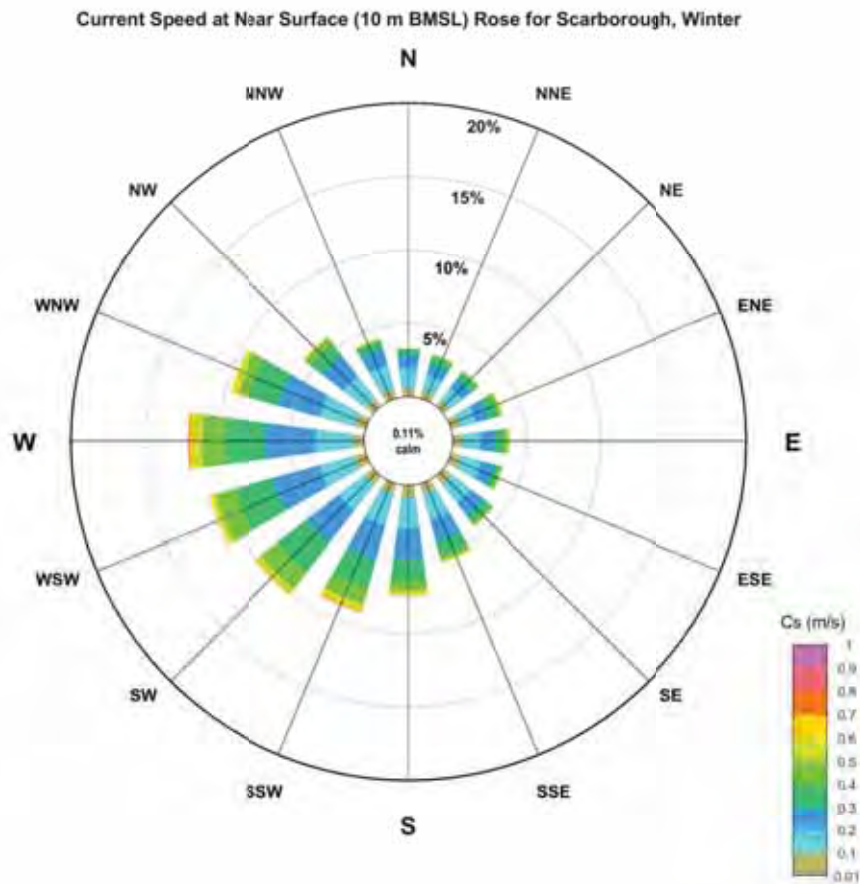


Figure 8. Summer (Nov - April) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at the Scarborough location (cyclones removed) (WEL, 2018).




<p>Data Information: Project: North West Shelf Location: Scarborough [113.2000°E, 19.8800°S] Data Period: Winter (01-Apr-2010 to 30-Sep-2011) Data Source: Measured Data Record Elevation: Near Surface (10 m BMSL) Local Water Depth (m): 950 Data Summary: Winter Number of Records: 49345 Missing Data (%): 3.01 Calm (% < 0.01m/s): 0.11</p>	<p>Key Statistics for Data Shown: Max Curr Spd: 1.03 m/s Mean Curr Spd: 0.25 m/s StdDev. Curr Spd: 0.13 m/s</p> 
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Figure 9. Winter (May-Sep) near surface combined frequency of 1-min mean current speed and direction (towards) measured at the Scarborough location (cyclones removed) (WEL, 2018).

North-west Cape

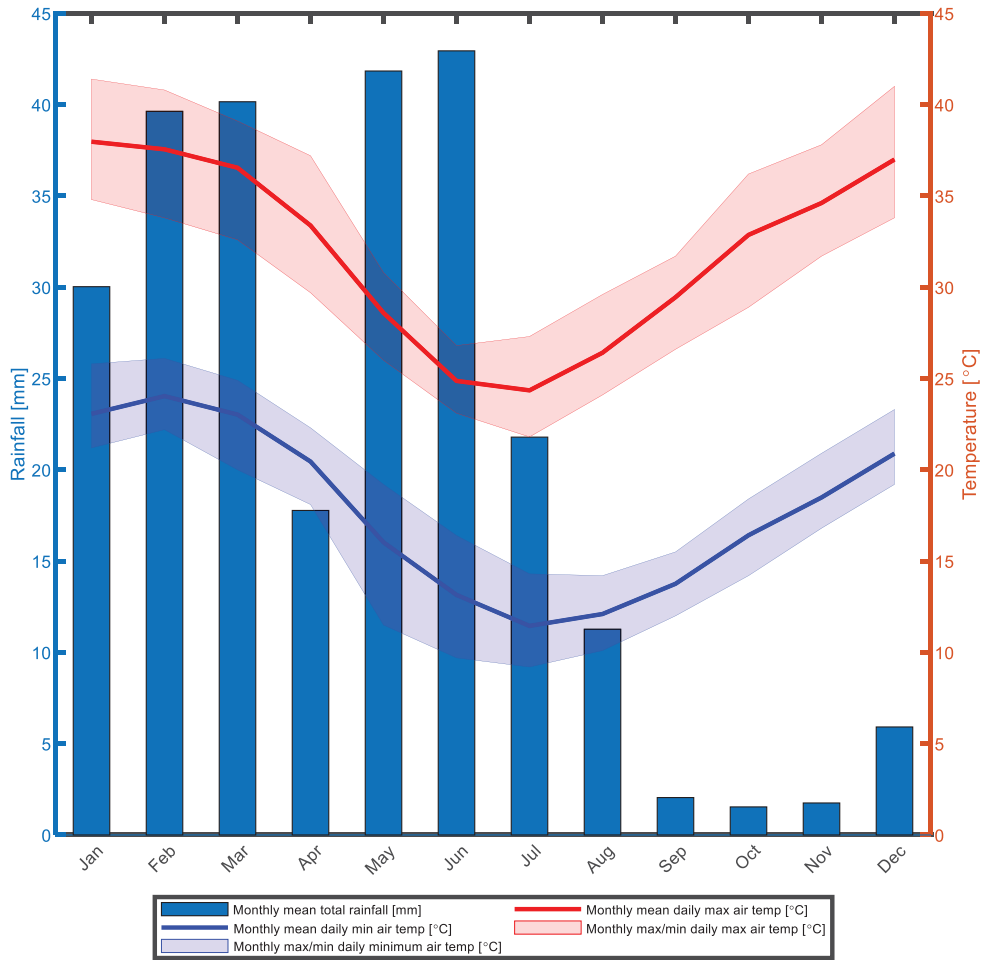
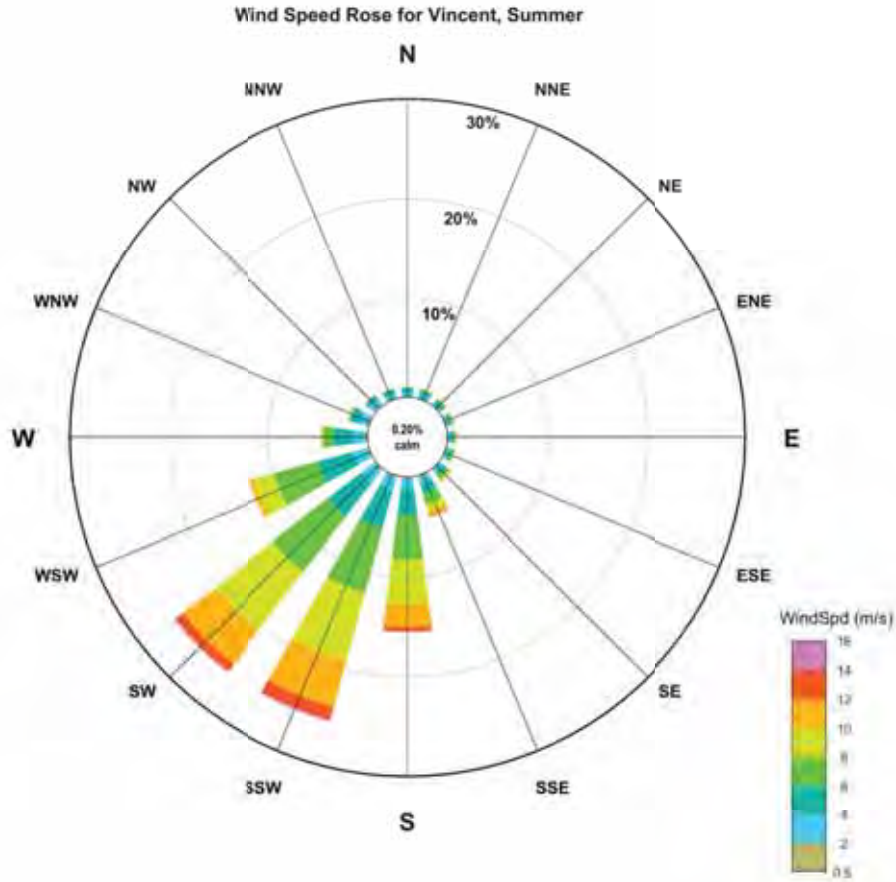
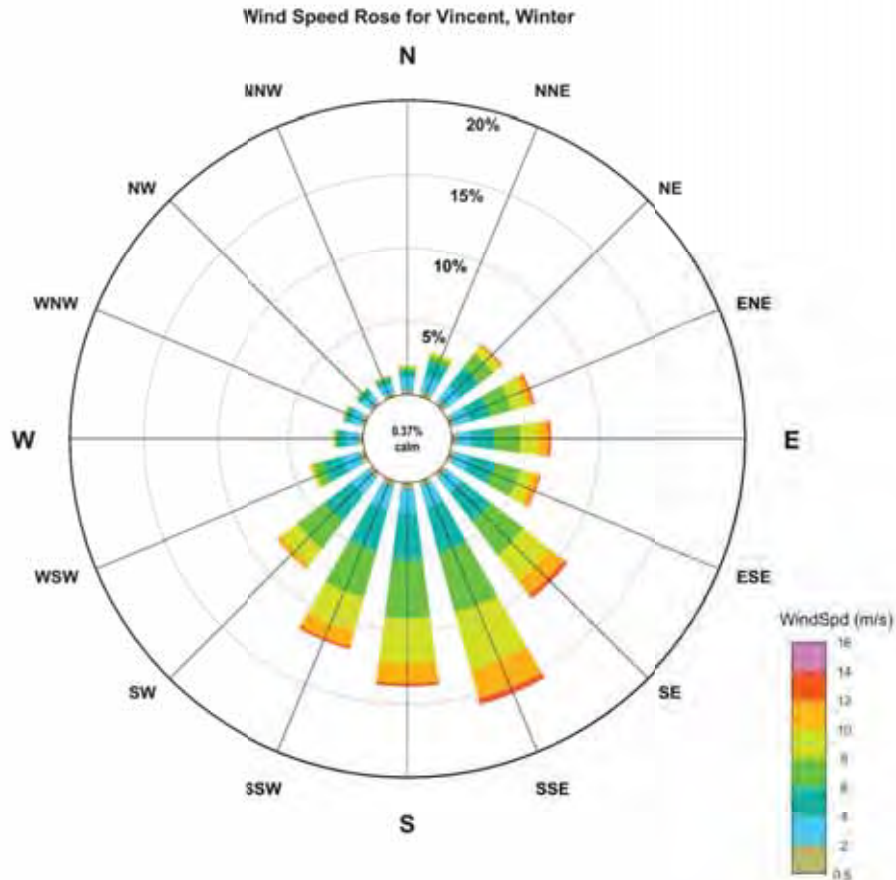


Figure 1. Monthly average total rainfall [mm] and air temperature [°C], calculated based on observations at the Learmonth Airport weather station from 1945-2020 and 1975-2020 respectively (Bureau of Meteorology 2020). Bars show the monthly average total rainfall values, and thick blue and red lines denote monthly average daily minimum and maximum air temperatures, respectively. Shaded blue and red areas denote monthly recorded extremes of daily minimum and maximum air temperature, respectively.



<p>Data Information: Project: North West Cape Location: Vincent [114.0600°E, 21.440°S] Data Period: Summer (01-Jan-1979 to 01-Jan-2019) Data Source: Modelled Hindcast Record Elevation: 10 m AMSL Local Water Depth (m): 350 Data Summary: Summer Number of Records: 159379 Missing Data (%): 8.91 Calm (% < 0.50m/s): 0.20 Measurement Format: 10-minute avg.</p>	<p>Key Statistics for Data Shown: Max Wind Speed: 18.86 m/s Mean Wind Speed: 7.10 m/s StdDev. Wind Speed: 2.75 m/s</p> <div style="text-align: right;">  </div>
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Figure 2. Summer distributions of wind speeds (10-minute at 10 m ASL) by 22.5° directional sectors at the Vincent site (Vincent Metocean). Note tropical cyclone events were not included in this distribution. Winds at Vincent in summer are predominantly from the SW to SSW in summer due to the presence of the Pilbara Heat Low (MetOcean Engineers, 2005).



Data Information:	Key Statistics for Data Shown:
Project: North West Cape	Max Wind Speed: 19.39 m/s
Location: Vincent [114.0600°E, 21.440°S]	Mean Wind Speed: 6.23 m/s
Data Period: Winter (01-Apr-1979 to 30-Sep-2018)	StdDev. Wind Speed: 2.78 m/s
Data Source: Modelled Hindcast	
Record Elevation: 10 m AMSL	
Local Water Depth (m): 350	
Data Summary: Winter	
Number of Records: 173626	
Missing Data (%): 1.17	
Calm (% < 0.50m/s): 0.37	
Measurement Format: 10-minute avg.	



Figure 3. Winter distributions of wind speeds (10-minute at 10 m ASL) 22.5° directional sectors at the Vincent site (Vincent Metocean). Note tropical cyclone events were not included in this distribution. In winter, winds are predominantly from the S to SE, associated with the South East Trades. Easterly gales are experienced at the Vincent location due to high pressure systems generating from the Great Australian Bight area to the site (MetOcean Engineers, 2005).

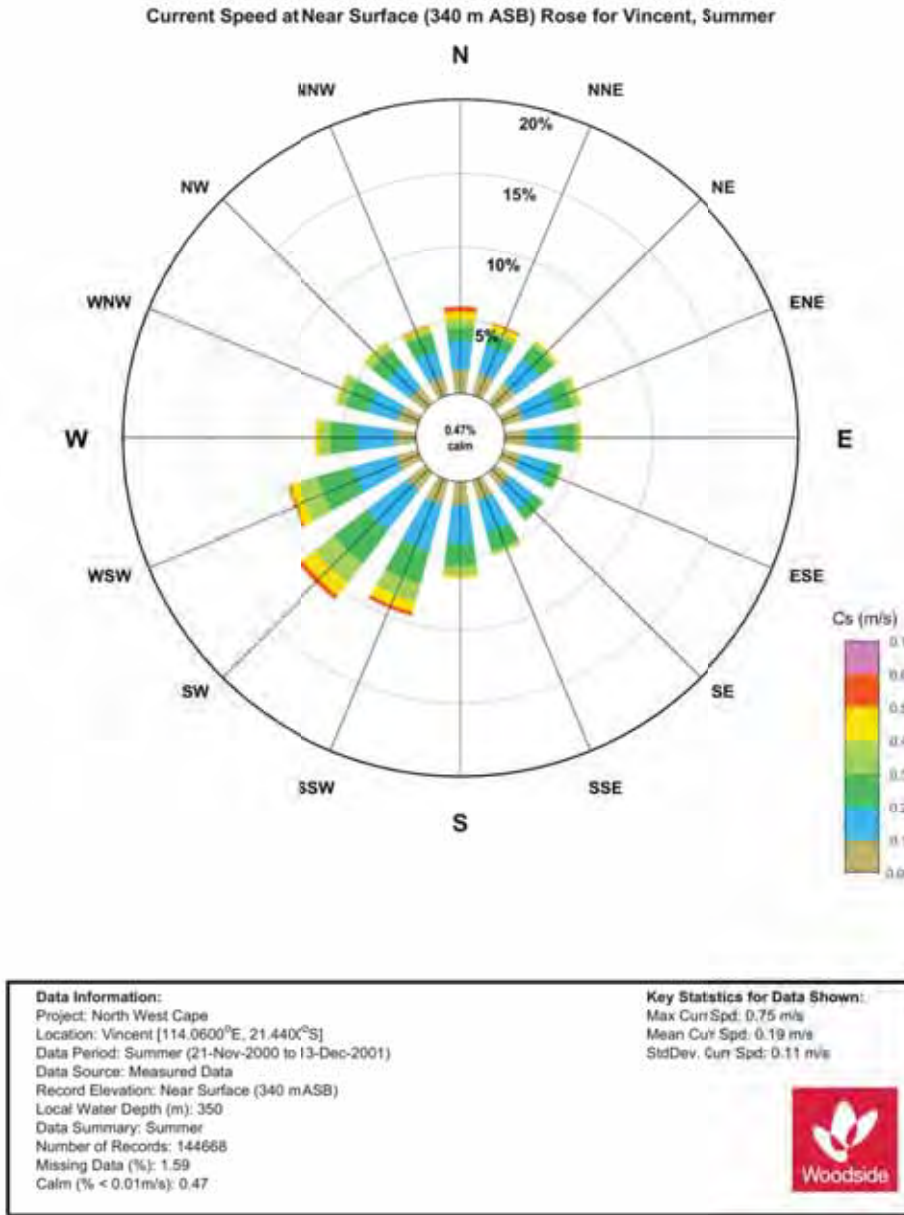


Figure 4. Summer (May – Sep) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at the Vincent location (cyclones removed) (WEL, 2016).

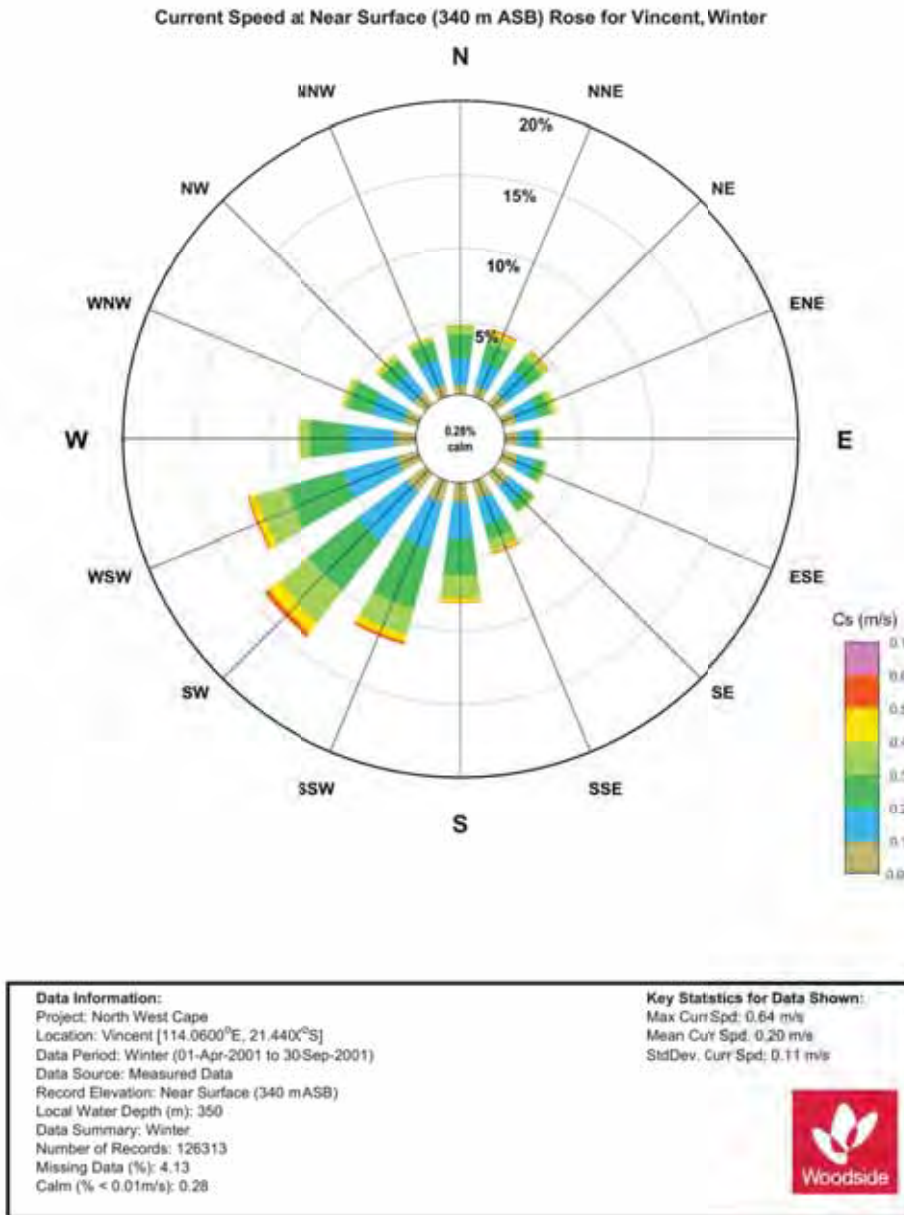


Figure 5. Winter (Nov – Apr) near surface combined frequency of 1-minute mean current speed and direction (towards) measured at the Vincent location (cyclones removed) (WEL, 2016).

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- RPS Metocean Pty Ltd 2008. "Browse LNG Development - Offshore MetOcean Measurement Programme: September 2006 to February 2008 Final Data Report." CRN: JB0020RT0019.
- Vincent Metocean – 40 Year Non-Cyclonic Metocean Database for Design Studies CRN: VA000OORT1400067309.
- WEL 2011. Greater Western Flank Detailed Metocean Design Criteria, Rev 2. CRN: A3000RG5492827.
- WEL 2016. Vincent – Basic Design Data Specification sheet – Metocean CRN: VA0000RT1400067309.
- WEL 2015. Winds Measured at North Rankin A 1995-2015.
- WEL 2018. Scarborough Development - Non-Cyclonic and Operational Metocean Design Criteria – Spreadsheet, Revision A, CRN: SA0009CT1400722569.
- WEL 2019. "Browse Development – Metocean Design Basis" CRN: JJ0013ST1400274448.

Appendix I FIRST STRIKE PLAN

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Revision: 7

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Scarborough 4D Baseline (B1) Marine Seismic Survey (MSS) Oil Pollution First Strike Plan

Corporate HSE
Hydrocarbon Spill Preparedness

June 2023
Revision 0c

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SCARBOROUGH FOUR-DIMENSIONAL MARINE SEISMIC SURVEY OIL POLLUTION FIRST STRIKE PLAN

SPILL FROM VESSEL

(Note: Shipboard Oil Pollution Emergency Plan should be implemented in conjunction with this document)

LEVEL 1

CONTROL AGENCY: Australian Marine Safety Authority

INCIDENT CONTROLLER: VESSEL MASTER (with response assistance from Woodside)

LEVEL 2 & 3

CONTROL AGENCY: Australian Marine Safety Authority (Commonwealth waters)
Department of Transport (State waters)

INCIDENT CONTROLLER: Australian Marine Safety Authority / Department of Transport (with response assistance from Woodside)

Guidance to Oil Spill Incident Levels

The most significant characteristic of the below guidance should be considered when determining level or escalation potential.

Characteristic	Level 1 Indicators	Level 2 Indicators	Level 3 Indicators
General Description	Generally able to be resolved within 24-48 hours.	Generally a response is required beyond 48 hours.	Response may extend beyond weeks.
Woodside Emergency Management (EM)/ EM)/Crisis Management Team (CMT) Activation	Onsite Incident Controller (IC) activated. Use of ICC support may be required.	Handover of Control from Onsite IC Corporate Incident Management Team (CIMT) Duty Manager (DM) in Peth.	Includes Perth based CMT activation.
Number of Agencies	First-response agency and Incident Management Team (IMT).	Multi-agency response.	Agencies from across government and industry.
Environment	Isolated impacts or with natural recovery expected within weeks.	Significant impacts and recovery may take months.	Significant area and recovery may take months. Remediation required.
Economy	Business level disruption (i.e. Woodside).	Business failure or 'Channel' impacts.	Disruption to a sector.
Public Affairs	Local and regional media coverage (WA).	National media coverage.	International media coverage.

For guidance on credible spill scenarios and hydrocarbon characteristics refer to [APPENDIX A](#).

For Spills Entering State Waters

If the spill impacts State waters/shorelines and is a Level 1, AMSA will remain the Control Agency. If the spill is a Level 2/3 then DoT will become the Control Agency for the response in State waters/shorelines only. In the event DoT become the Control Agency they will appoint an Incident Controller and form a separate Incident Management Team to manage the State waters/shorelines response only. The coordination structure for a concurrent hydrocarbon spill in both Commonwealth and State waters/shorelines is shown in APPENDIX E – Coordination Structure for a Concurrent Hydrocarbon Spill in Both Commonwealth And State Waters/Shorelines.

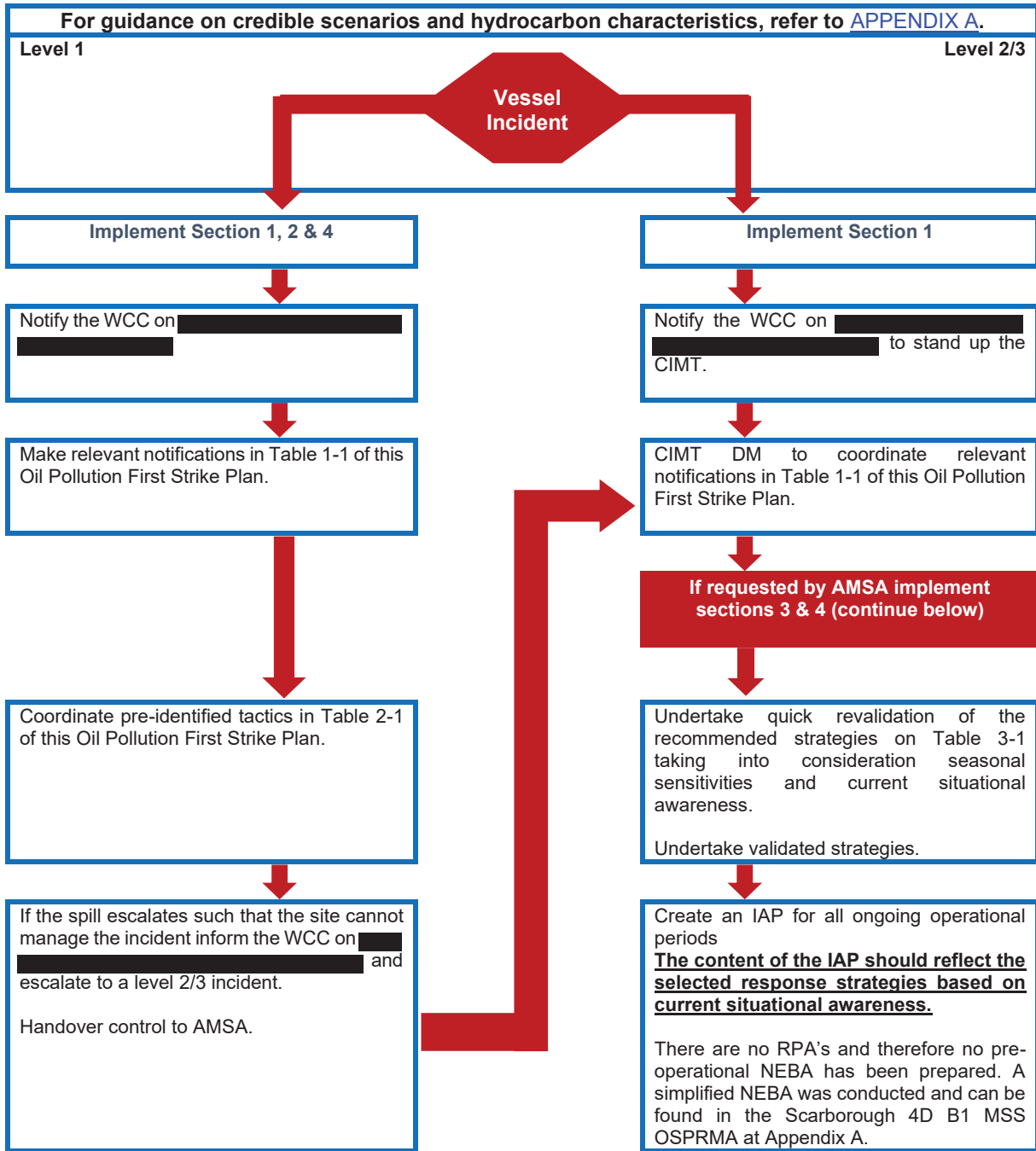
Initially Woodside will be required to make available an appropriate number of suitably qualified persons to work in the DoT IMT (see [APPENDIX G](#)). DoT's role as the Controlling Agency/HMA for Level 2 and 3 spills in State waters/shorelines does not negate the requirement for Woodside to have appropriate plans and resources in place to adequately respond to a Marine Hydrocarbon Spill incident in State waters/shorelines or to commence the initial response actions to a spill prior to DoT establishing incident control in line with DoT Offshore Petroleum Industry Guidance Note - Marine Oil Pollution: Response and Consultation Arrangements (July 2020). Cost recovery arrangements for offshore marine pollution incidents (MOP) are in accordance with Section 9 of the Guidance Note:

[https://www.transport.wa.gov.au/mediaFiles/marine/MAC P Westplan MOP OffshorePetroleumIndGuidance.pdf](https://www.transport.wa.gov.au/mediaFiles/marine/MAC_P_Westplan_MOP_OffshorePetroleumIndGuidance.pdf)

Woodside's Incident Management Structure for a Hydrocarbon Spill, including Woodside Liaison Officer's command structure within DoT can be seen at [APPENDIX F](#).

Response Process Overview

Use the below to determine which parts of this plan are relevant to the incident.



1. NOTIFICATIONS (ALL LEVELS)

The Incident Controller or delegate must ensure the below notifications (Table 1-1) are completed within the designated timeframes.

For other environmental notifications required refer to the Scarborough 4D B1 MSS Environment Plan.

Table 1-1: Immediate Notifications

Notification timing	Responsibility	Authority /Company	Name	Contact Number	Instruction	Form/ Template	Mark Complete (✓)
Notifications to be made for ALL LEVELS of spill (For spills from a vessel the following notifications must be undertaken by a WEL representative).							
Immediately	Vessel master/ Woodside Site Rep (WSR)	Woodside Communication Centre (WCC)	GTO Duty Manager	[Redacted]	Verbally notify WCC of event and estimated volume and hydrocarbon type.	Verbal	
Within 2 hours	GTO Duty Manager	National Offshore Petroleum Safety Environmental Management Authority (NOPSEMA ¹)	Incident notification office	[Redacted]	Verbally notify NOPSEMA for spills >80L. Record notification using Initial Verbal Notification Form or equivalent and send to NOPSEMA as soon as practicable (cc to NOPTA and DMIRS).	[Redacted]	
Within 3 days	WSR, CIMT DM or Delegate				Provide a written NOPSEMA Incident Report Form as soon as practicable (no later than 3 days after notification) (cc to NOPTA and DMIRS) NOPSEMA: NOPTA: [Redacted] DMIRS: [Redacted]	[Redacted]	

¹ Notification to NOPSEMA must be from a Woodside Representative.

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Notification timing	Responsibility	Authority /Company	Name	Contact Number	Instruction	Form/ Template	Mark Complete (✓)
As soon as practicable	CIMT DM or Delegate	Woodside	Environment Duty Manager	As per roster	Verbally notify Duty Environment of event and seek advice on relevant performance standards from EP	Verbal	
As soon as practicable	CIMT DM or Delegate	Department of Climate Change, Energy, the Environment and Water (DCCEEW) (Director of National Parks)	Marine Park Compliance Duty Officer		The Marine Park Compliance Duty Officer is notified in the event of oil pollution within a marine park, or where an oil spill response action must be taken within a marine park, so far as reasonably practicable, prior to response action being taken. This notification should include: <ul style="list-style-type: none"> • titleholder details • time and location of the incident • proposed response arrangements and locations as per the OPEP • contact details for the response coordinator. 	Verbal	
Without delay as per protection of the Sea Act, part II, section 11(1)	Vessel Master	Australian Maritime Safety Authority (AMSA)	Response Coordination Centre (RCC)		Verbally notify AMISA RCC of the hydrocarbon spill. Follow up with a written Marine Pollution Report (POLREP) as soon as practicable following verbal notification.		
ADDITIONAL LEVEL 2/3 NOTIFICATIONS							
As soon as practicable	CIMT DM or Delegate	AMOSC	AMOSC Duty Manager		Notify AMOSC that a spill has occurred and follow-up with an email from the CIMT Deputy Leader/ IMT IC/ CMT Adviser/ CMT Leader to formally activate AMOSC. Determine what resources are required consistent with the AMOSPlan and detail in a Service Contract that will be sent to Woodside from AMOSC upon activation.		

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Notification timing	Responsibility	Authority /Company	Name	Contact Number	Instruction	Form/ Template	Mark Complete (✓)
As soon as practicable	CIMT DM or Delegate	Oil Spill Response Limited (OSRL)	OSRL Duty Manager	[REDACTED]	Contact OSRL duty manager and request assistance from technical advisor in Perth. Send the notification form to OSRL as soon as practicable. For mobilisation of resources, send the Mobilisation Form to OSRL as soon as practicable.	Notification: [REDACTED] Mobilisation: [REDACTED]	
Within 2 hours of becoming aware of a marine oil pollution incident (MOP) that occurs in or may impact State waters	CIMT DM or Delegate	WA Department of Transport	DoT Maritime Environmental Emergency Response Unit (MEER) Duty Officer	[REDACTED]	Marine Duty Manager to verbally notify DoT that a spill has occurred and request use of equipment stored in the Karratha supply shed. Follow up with a written POLREP as soon as practicable following verbal notification. Additionally DoT to be notified if spill is likely to extend into WA State waters. Request DoT to provide Liaison to WEL IMT.	[REDACTED]	
As soon as practicable if there is potential for oiled wildlife or the spill is expected to contact land or waters managed by WA Department of Biodiversity, Conservation and Attractions	CIMT DM or Delegate	WA Department of Biodiversity, Conservation and Attractions (DBCA)	Duty Officer	[REDACTED]	Phone call notification	Verbal	
As soon as practicable	Public Information	Relevant persons/ organisations	To be determined	To be determined	Should it be identified that additional persons such as, but not limited to, commercial fishers, tourism operators or relevant cultural authorities may be affected, Woodside would, at the relevant	Verbal initially	

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Notification timing	Responsibility	Authority /Company	Name	Contact Number	Instruction	Form/ Template	Mark Complete (✓)
As soon as practicable	CIMT DM or Delegate	Marine Spill Response Corporation (MSRC)	MSRC Response Manager	[REDACTED]	time, engage with these parties as appropriate and in alignment with the Oil Spill Preparedness and Response Mitigation Assessment (OSPRMA) for Scarborough 4D Baseline Marine Seismic Survey. Relevant persons/ organisations will be re-assessed throughout the response period. Activate the contract with MSRC (in full) for the provision of up to 30 personnel depending on what skills are required. Please note that provision of these personnel from MSRC are on a best endeavours basis and are not guaranteed.	Verbal	

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2. LEVEL 1 RESPONSE

2.1 Mobilisation of Response Techniques

For the relevant hydrocarbon type, undertake quick revalidation of the recommended techniques and pre-identified tactics indicated with a 'Yes' in **Table 2-1**. Undertake all validated pre-identified tactics immediately. These tactics should be carried out using the associated plan identified under **Table 2-1** Operational Plan column.

All response techniques and pre-identified tactics have been identified from the pre-operational Net Environmental Benefits Analysis (NEBA) presented in the Scarborough 4D B1 MSS Environment Plan Appendix D (Woodside's Oil Spill Preparedness and Response Mitigation Assessment).

Table 2-1: Level 1 Response Summary

Response Techniques	Hydrocarbon Type		Pre- Identified Tactics	Responsible	ALARP Commitment Summary	Complete ✓	Link to Operational Plans for notification numbers and actions
	Marine Diesel Oil	Oil					
Monitor and evaluate – tracking buoy (OM02)	Yes		Tracking buoy to be deployed from onsite vessel.	Chief Officer/ Marine Crew	DAY 1: Tracking buoy deployed within two hours.		Surveillance and Reconnaissance to Detect Hydrocarbons and Resources at Risk (OM02 of The Operational Monitoring Operational Plan).
Please consider instructing the CIMT DM to activate or implement any of the following Pre-Identified tactics. The following tactics will assist in answering the '7 Questions of Spill Assessment' identified in <u>Appendix C</u> to increase situational awareness.							
Monitor and evaluate – predictive modelling (OM01)	Yes		Undertake initial modelling using the Rapid assessment oil spill tool and weathering fate analysis using ADIOS (or refer to the hydrocarbon information in Appendix A).	Intelligence or Environment	DAY 1: Initial modelling within six hours using the Rapid Assessment Tool.		Predictive Modelling of Hydrocarbons to Assess Resources at Risk (OM01 of The Operational Monitoring Operational Plan). <i>Planning to download immediately and follow steps</i>
	Yes		Send Oil Spill Trajectory Modelling (OSTM) form (Appendix B Form 7) to RPS APASA response team (email [REDACTED]) and call RPS Response Duty Officer Phone [REDACTED]	Intelligence	DAY 1: Detailed modelling within four hours of APASA receiving information from Woodside.		
Monitor and evaluate – aerial surveillance (OM02)	Yes		Instruct Aviation Duty Manager to commence aerial observations in daylight hours. Aerial surveillance observer to complete log in Appendix B Form 8 .	Logistics - Aviation	DAY 1: Two trained aerial observers. One aircraft available.		Surveillance and Reconnaissance to Detect Hydrocarbons and Resources at Risk (OM02 of The Operational Monitoring Operational Plan). <i>Planning to download immediately and follow steps</i>
Monitor and evaluate – satellite tracking (OM02)	Yes		The Intelligence duty manager should be instructed to stand up KSAT to provide satellite imagery of the spill. [REDACTED]	Intelligence	DAY 1: Service provider will confirm availability of		

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Response Techniques	Hydrocarbon Type		Pre- Identified Tactics	Responsible	ALARP Commitment Summary	Complete ✓	Link to Operational Plans for notification numbers and actions
	Marine Diesel	Oil					
					an initial acquisition within two hours. Data received to be uploaded into Woodside Common Operating Picture.		
Monitor and evaluate – monitoring hydrocarbons in water (OM03)	Yes		Consider the need to mobilise resources to undertake water quality monitoring (OM03).	Planning or Environment	DAY 3: Water quality assessments access and capability.		Detecting and Monitoring for the Presence and Properties of Hydrocarbons in the Marine Environment (OM03 of The Operational Monitoring Operational Plan).
Monitor and evaluate – pre-emptive assessment of receptors at risk (OM04)	Yes		Consider the need to mobilise resources to undertake pre-emptive assessment of sensitive receptors at risk (OM04).	Planning or Environment	In agreement with WA DoT, deployment of two specialists for each of the Response Protection Areas (RPA) within 10 days of predicted impacts.		Pre-emptive Assessment of Sensitive Receptors (OM04 of The Operational Monitoring Operational Plan).
Monitor and evaluate – shoreline assessment (OM05)	Yes		Consider the need to mobilise resources to undertake shoreline assessment surveys (OM05).	Planning or Environment	In agreement with WA DoT, deployment of two specialists for each of the Response Protection Areas (RPA) within 10 days		Shoreline Assessment (OM05 of The Operational Monitoring Operational Plan).

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Response Techniques	Hydrocarbon Type		Pre- Identified Tactics	Responsible	ALARP Commitment Summary	Complete ✓	Link to Operational Plans for notification numbers and actions
	Marine Diesel Oil						
					of predicted impacts.		

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3. LEVEL 2/3 RESPONSE

3.1 Mobilisation of Response Techniques

For the relevant hydrocarbon type, undertake quick revalidation of the recommended techniques and pre-identified tactics indicated with a 'Yes' in **Table 3-1**. Undertake all validated pre-identified tactics immediately. These tactics should be carried out using the associated plan identified under **Table 3-1** Operational Plan column.

All response techniques and pre-identified tactics have been identified from the pre-operational Net Environmental Benefits Analysis (NEBA) presented in the Scarborough 4D B1 MSS Environment Plan Appendix D (Woodside's Oil Spill Preparedness and Response Mitigation Assessment).

Table 3-1: Level 2/3 Response Summary

Response Techniques	Hydrocarbon Type		Pre- Identified Tactics	Responsible	ALARP Commitment Summary	Complete ✓	Link to Operational Plans for notification numbers and actions
	Marine	Diesel Oil					
Monitor and evaluate – tracking buoy (OM02)	Yes		If a vessel is on location, consider the need to deploy the oil spill tracking buoy. If no vessel is on location, consider the need to mobilise oil spill tracking buoys from the King Bay Supply Base (KBSB) Stockpile. If a surface sheen is visible from the facility, deploy the satellite tracking buoy within two hours.	Chief Officer/ Marine Crew	DAY 1: Tracking buoy deployed within two hours.		Surveillance and Reconnaissance to Detect Hydrocarbons and Resources at Risk (OM02) of The Operational Monitoring Operational Plan. Deploy tracking buoy in accordance with [REDACTED]
Monitor and evaluate – predictive modelling (OM01)	Yes		Undertake initial modelling using the Rapid assessment oil spill tool and weathering fate analysis using ADIOS (or refer to the hydrocarbon information in Appendix A).	Intelligence or Environment	DAY 1: Initial modelling within six hours using the Rapid Assessment Tool. Detailed modelling within four hours of APASA receiving information from Woodside.		Predictive Modelling of Hydrocarbons to Assess Resources at Risk (OM01 of The Operational Monitoring Operational Plan).
Monitor and evaluate – aerial surveillance (OM02)	Yes		Send Oil Spill Trajectory Modelling (OSTM) form (Appendix B Form 7) to RPS APASA ([REDACTED]).	Intelligence	DAY 1: Detailed modelling within 4 hours of APASA receiving information from Woodside.		
Monitor and evaluate – satellite tracking (OM02)	Yes		Instruct Aviation Duty Manager to commence aerial observations in daylight hours. Aerial surveillance observer to complete log in Appendix B Form 8 . The intelligence duty manager should be instructed to stand up Kongsberg Satellite Services (KSAT) to provide satellite imagery of the spill. [REDACTED]	Logistics - Aviation	DAY 1: Two trained aerial observers. One aircraft available.		Surveillance and Reconnaissance to Detect Hydrocarbons and Resources at Risk (OM02 of The Operational Monitoring Operational Plan). <i>Planning to download immediately and follow steps</i>

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Response Techniques	Hydrocarbon Type		Pre- Identified Tactics	Responsible	ALARP Commitment Summary	Complete ✓	Link to Operational Plans for notification numbers and actions
	Marine Diesel Oil						
Monitor and evaluate – monitoring hydrocarbons in water (OM03)	Yes		Consider the need to mobilise resources to undertake water quality monitoring (OM03).	Planning or Environment	DAY 3: Water quality assessment access and capability Daily fluorometry reports will be provided to IMT.		Detecting and Monitoring for the Presence and Properties of Hydrocarbons in the Marine Environment (OM03 of The Operational Monitoring Operational Plan).
Monitor and evaluate – pre-emptive assessment of receptors at risk (OM04)	Yes		Consider the need to mobilise resources to undertake pre-emptive assessment of sensitive receptors at risk (OM04).	Planning or Environment	In agreement with WA DoT, deployment of two specialists for each of the Response Protection Areas (RPA) within 10 days of predicted impacts.		Pre-emptive Assessment of Sensitive Receptors (OM04 of The Operational Monitoring Operational Plan).
Monitor and evaluate – shoreline assessment (OM05)	Yes		Consider the need to mobilise resources to undertake shoreline assessment surveys (OM05).	Planning or Environment	In agreement with WA DoT, deployment of two specialists in SCAT for each of the RPAs within 10 days of predicted impacts.		Shoreline Assessment (OM05 of The Operational Monitoring Operational Plan).
Surface Dispersant	No		This response strategy is not recommended.				
Mechanical Dispersion	No		This response strategy is not recommended.				
Containment and Recovery	No		This response strategy is not recommended.				
In-situ Burning	No		This response strategy is not recommended.				
Shoreline Protection and Deflection	No		This response strategy is not recommended.				
Shoreline Clean Up	No		This response strategy is not recommended.				

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Response Techniques	Hydrocarbon Type		Pre- Identified Tactics	Responsible	ALARP Commitment Summary	Complete ✓	Link to Operational Plans for notification numbers and actions
	Marine	Diesel Oil					
Oiled Wildlife Response	Yes		If oiled wildlife is a potential impact, request AMOSC to mobilise containerised oiled wildlife first strike kits and relevant personnel. Refer to relevant Tactical Response Plan for potential wildlife at risk. Mobilise AMOSC Oiled Wildlife Containers. Consider whether additional equipment is required from local suppliers.	Logistics and Planning	DAY 5: Contracted capability to treat up to an additional 250 individual fauna within a five-day period. Facilities for oiled wildlife rehabilitation are operational 24/7		Oiled Wildlife Response Operational Plan
Scientific Monitoring (Type II)	Yes		Notify Woodside science team of spill event.	Environment			Oil Spill Scientific Monitoring Programme – Operational Plan Link

4. PRIORITY RECEPTORS

Based on hydrocarbon spill risk modelling results the sensitive receptors outlined in **Table 4-2** are identified as priority protection areas, as they have the potential to be contacted by hydrocarbon at or above impact threshold levels within 48 hours of a spill. Please note that impact thresholds (10 g/m² surface hydrocarbon concentration, 100 g/m² shoreline accumulation, and 100 ppb entrained hydrocarbon concentration) are used to determine the Zone of Consequence (ZoC) identified in the Environment Plan and are lower than response thresholds (**Table 4-1**).

Table 4-1 Response Thresholds

Surface Hydrocarbon (g/m ²)	Description
>10	Predicted minimum threshold for commencing operational monitoring
50	Predicted minimum floating oil threshold for containment and recovery and surface dispersant application ²
100	Predicted optimum floating oil threshold for containment and recovery and surface dispersant application
100	Predicted minimum shoreline accumulation threshold for shoreline assessment operations
250	Predicted minimum threshold for commencing shoreline clean-up operations

Table 4-2 Receptors for priority protection with potential impact within 48 hours (Credible Scenario-01)

Receptor	Distance and Direction from Operational Area (km)	Minimum time to shoreline contact (above 100g/m ²) in days	Maximum shoreline accumulation (above 100g/m ²) in m ³	Tactical Response Plans (also available within the Data Directory DRIMS#9542566)
Open Ocean – Commonwealth Waters	Overlaps	N/A	N/A	N/A

Hydrocarbon spill modelling results indicate the sensitive receptors listed below have the potential to be contacted by hydrocarbons beyond 48 hours of a spill:

- Open Commonwealth waters
- Gascoyne AMP (entrained hydrocarbon concentrations ≥100 ppb)

Tactical Response Plans are prepared by Woodside for shoreline locations and can be accessed via the [Oil Spill Portal - Tactical Response Plans](#)³. These contain the details of potential forward operating bases and staging areas that may be used in the event that an offshore oiled wildlife response is required, or if operational monitoring indicates that additional response techniques are required. Tactical Response Plans are not available for offshore locations.

Oil Spill Trajectory Modelling specific to the spill event will be required to determine the regional sensitive receptors to be contacted beyond 48 hours of a spill.

Figure 4-1 illustrates the location of regional sensitive receptors in relation to the Scarborough 4D B1 MSS operational area and identifies priority protection areas.

² At 50g/m² containment and recovery and surface dispersant application operations are not expected to be particularly effective. This threshold represents a conservative approach to planning response capability and displaying the spread of surface oil.

³ The Tactical Response Plans for the RPA's identified contain the details of potential forward operating bases and staging areas. Incident Command Centre: For Level 1 incidents the in-field team and asset operator will lead the response on-scene. For level 2/3 Incident the Incident command centre will be located in Perth at Woodside's Building. The Woodside CICC is fully equipped with communications equipment and technology to ensure the coordination of response activities for the overall response.

Consideration should be given to other stakeholders (including mariners) in the vicinity of the spill location. There are no oil and gas facilities located within 50 km of the Operational Area.

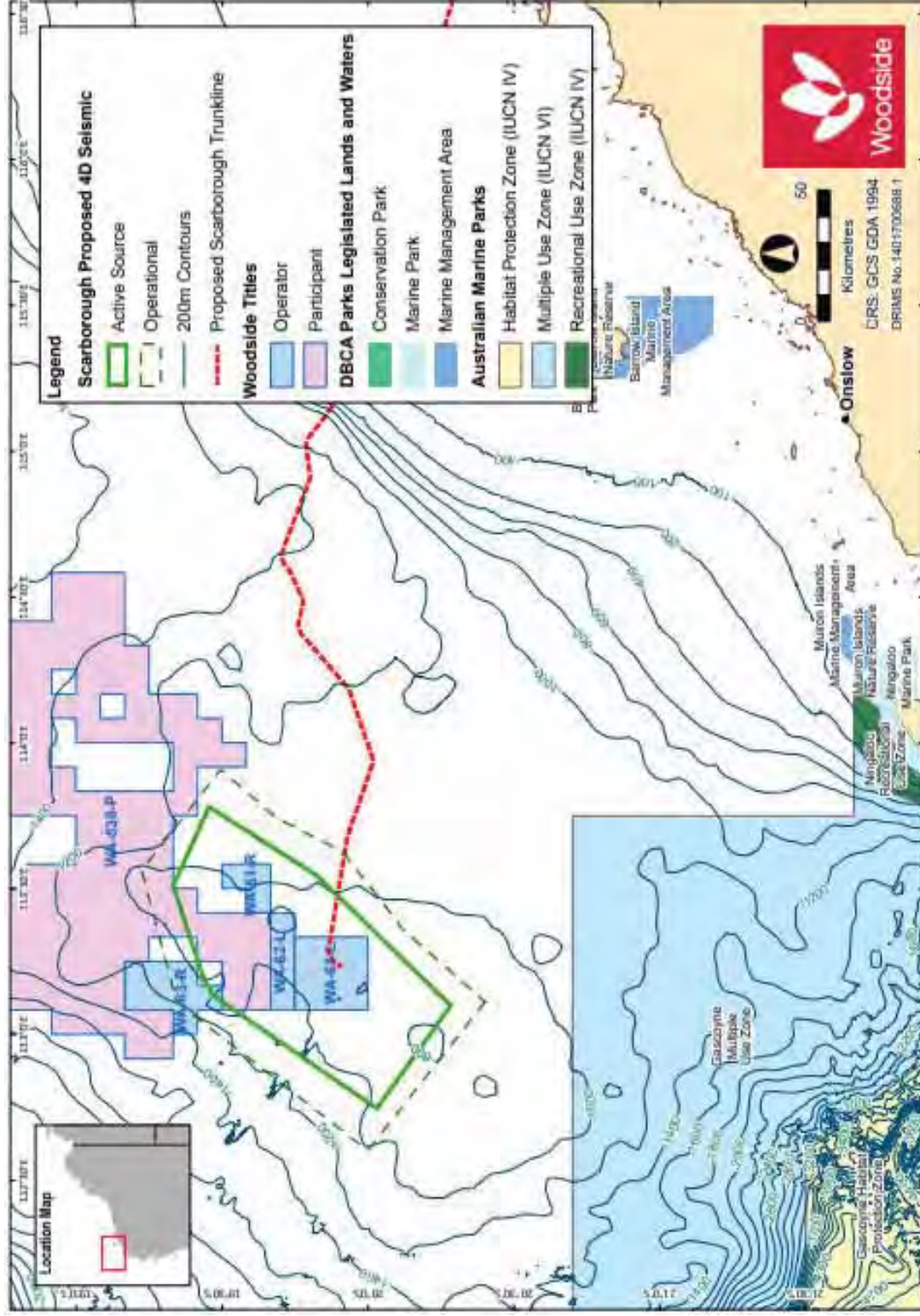


Figure 4-1 Regional Sensitive Receptors – Scarborough 4D B1 MSS

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5. DISPERSANT APPLICATION

Dispersant is not considered an appropriate response strategy for this activity as described in the Scarborough 4D B1 MSS Environment Plan Appendix D (Woodside's Oil Spill Preparedness and Response Mitigation Assessment).

APPENDIX A – CREDIBLE SPILL SCENARIOS AND HYDROCARBON INFORMATION

For more detailed hydrocarbon information see the [Hydrocarbon Data Directory \(DRIMS#9542566\)](#)

Credible Spill Scenarios

Scenario	Product	Maximum Volumes	Suggested ADIOS2 Analogue*
CS-01 Unplanned hydrocarbon release caused by marine vessel collision (Project support vessel)	Marine diesel (API 37.2°)	250 m ³	Diesel Fuel Oil (API 37.2°)
CS-03 Loss of containment caused by refuelling hose failure, coupling failure or operator error.	Marine diesel (API 37.2°)	8 m ³	Diesel Fuel Oil (API 37.2°)

* Initial screening of possible ADIOS2 analogues was done by considering hydrocarbons with similar APIs. Suggested selection was based on the closest distillation cut to WEL hydrocarbon. Only hydrocarbons with distillation cuts that showed results for > 380°C were included in selection process.

Marine Diesel (Group 2 Oil)

Marine diesel is a mixture of volatile and persistent hydrocarbons, with approximately 45% by mass predicted to evaporate over the first 24h under low wind speeds (5 kn), with further evaporation slowing over time. Under variable windspeeds, where the winds are of greater strength, the proportion of evaporation would be lower. The heavier components of diesel have a strong tendency to entrain into the upper water column due to wind waves, but can refloat to the surface if wind waves abate.

A series of model weather tests were conducted to illustrate the potential behaviour of marine diesel when exposed to idealised and representative environmental conditions:

- Instantaneous release (1-hour discharge) onto the water surface at a discharge rate of 50 m³/hr under calm wind conditions (constant 5 knots), assuming low seasonal water temperature (27 °C) and average air temperature (25 °C). Slick also subject to ambient tidal and drift currents (Figure A-1).
- Instantaneous release (1-hour discharge) onto the water surface at a discharge rate of 50 m³/hr under variable wind conditions (4-19 knots, drawn from representative data files), assuming low seasonal water temperature (27 °C) and average air temperature (25 °C). Slick also subject to ambient tidal and drift currents (Figure A-2).

The first case is indicative of cumulative weathering rates under calm conditions that would not generate entrainment, while the second case may represent conditions that could cause a minor degree of entrainment. Both scenarios provide examples of potential behaviour during periods of a spill event.

The mass balance forecast for the 5 kn constant-wind case (Figure A-1) for marine diesel shows that approximately 45% of the oil is predicted to evaporate within 24 hours. Under these calm conditions the majority of the remaining oil on the water surface will weather at a slower rate due to being comprised of the longer-chain compounds with higher boiling points. Evaporation of the residual compounds will slow significantly, and they will then be subject to more gradual decay through biological and photochemical processes.

Under the variable-wind case (Figure A-2), where the winds are of greater strength, entrainment of marine diesel into the water column is indicated to be significant. Approximately 24 hours after the spill, around 45% of the oil mass is forecast to have entrained and a further 35% is forecast to have evaporated, leaving only a small proportion of the oil floating on the water surface (<1%). The residual compounds will tend to remain entrained beneath the surface under conditions that generate wind waves (approximately >6m/s).

The increased level of entrainment in the variable-wind case will result in a higher percentage of biological and photochemical degradation, where the decay of the floating slicks and oil droplets in the water column occurs at an approximate rate of 1.8% per day with an accumulated total of ~13% after 7 days, in comparison to a rate of ~0.2% per day and an accumulated total of 1.5% after 7 days in the constant-wind case. Given the large proportion of entrained oil and the tendency for it to remain mixed in the water column, the remaining hydrocarbons will decay and/or evaporate over time scales of several weeks to a few months. This long weathering duration will extend the area of potential effect, requiring the break-up and dispersion of the slicks and droplets to reduce concentrations below the thresholds.

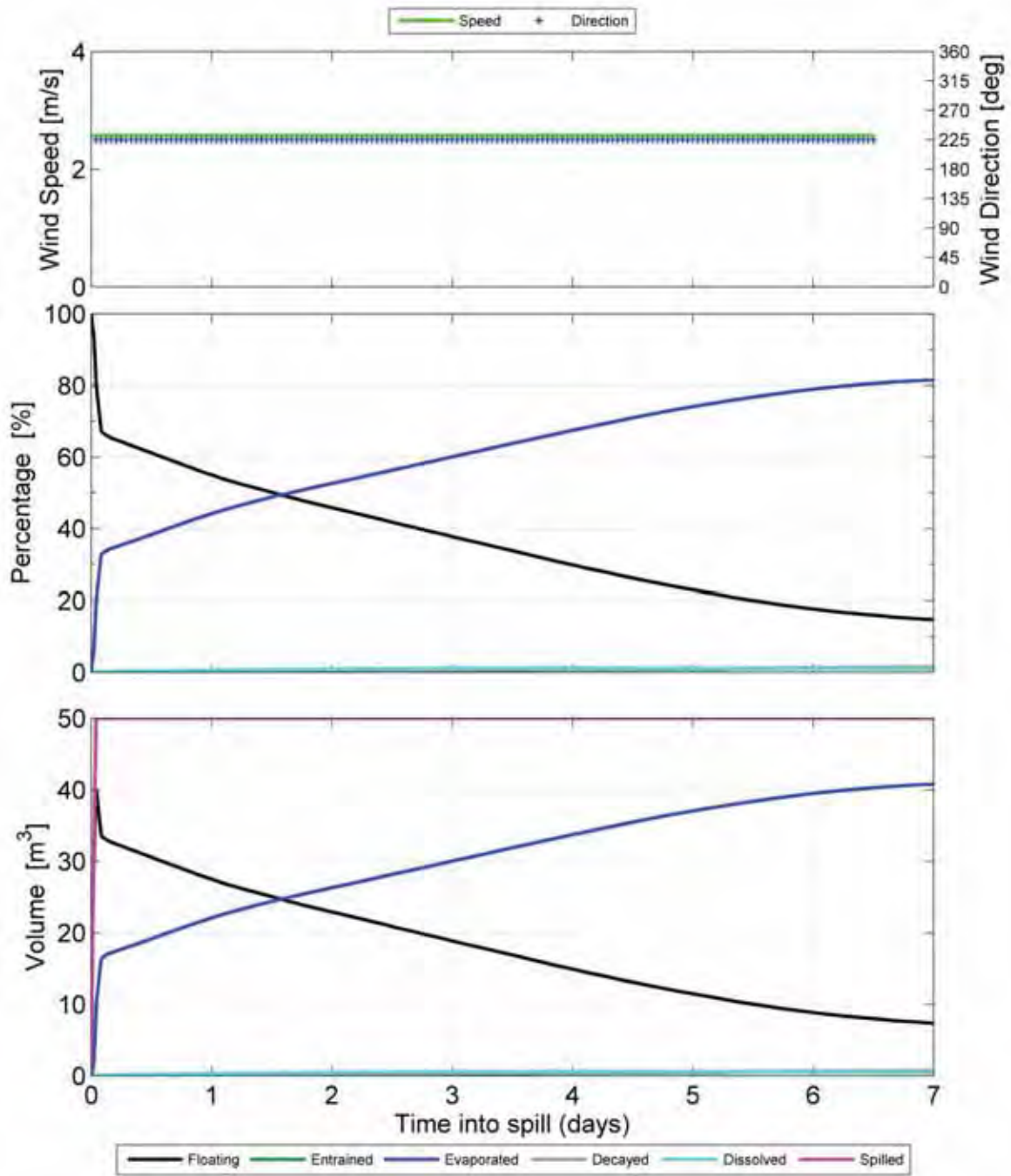


Figure A-1: Mass balance plot representing, as proportion (middle panel) and volume (bottom panel), the weathering of marine diesel spilled onto the water surface as a one-off release (50 m³ over 1-hour) and subject to a constant 5kn (2.6 /s) wind at 27°C water temperature and 25°C air temperature.

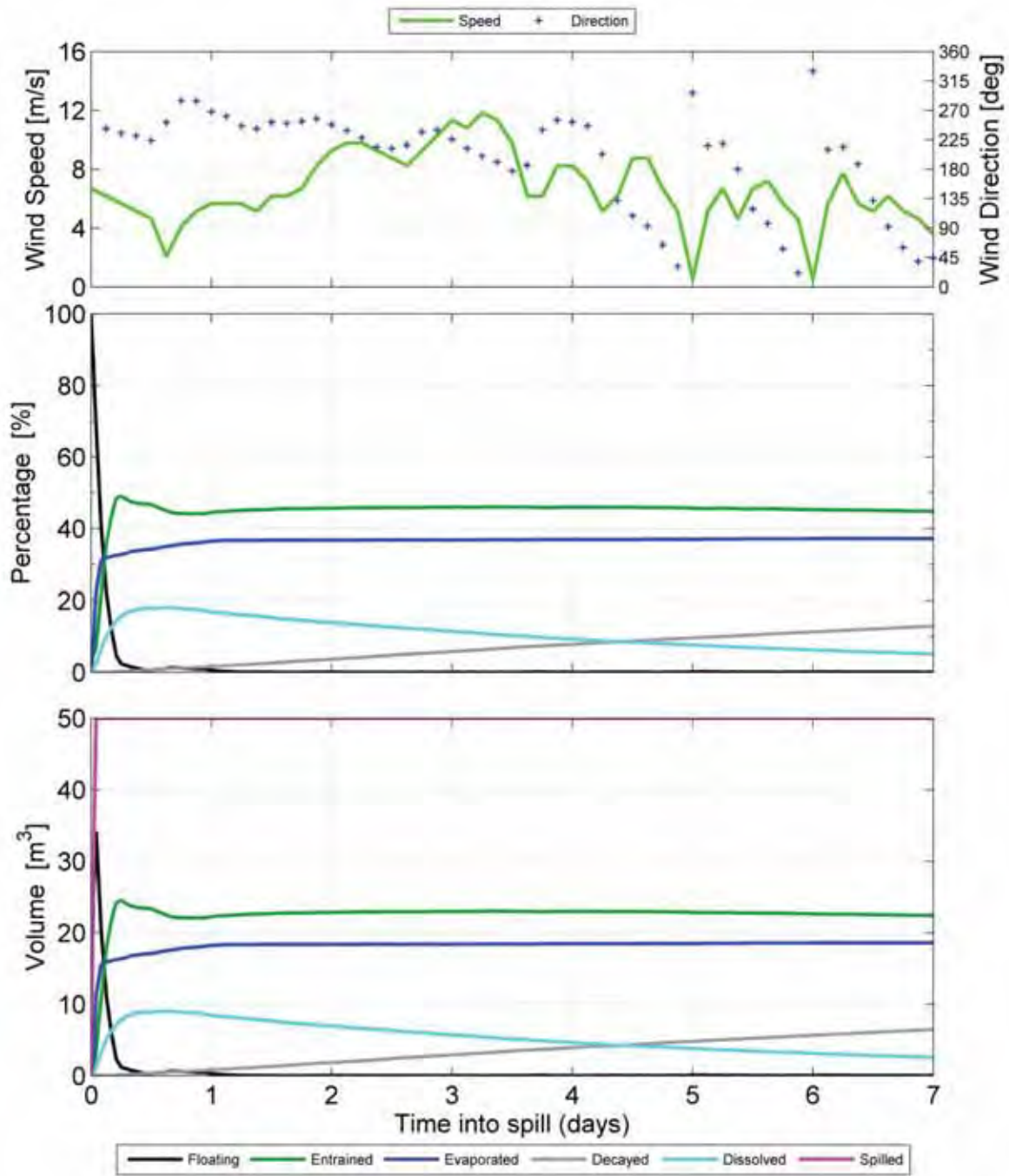


Figure A-2 Mass balance plot representing, as proportion (middle panel) and volume (bottom panel), the weathering of marine diesel spilled onto the water surface as a one-off release (50 m³ over 1 hour) and subject to variable wind at 27°C water temperature and 25°C air temperature.

APPENDIX B – FORMS

Form No.	Form Name	Link
1	Record of Verbal Notification to Regulator Template	■
2	NOPSEMA Notification Template	■
3	Marine Pollution Report (POLREP – AMSA)	■
4	AMOSOC Service Contract Note	■
5	Marine Pollution Report (POLREP – DoT)	■
6a	OSRL Initial Notification Form	■
6b	OSRL Mobilisation Activation Form	■
7	RPS Response Oil Spill Trajectory Modelling Request	■
8	Aerial Surveillance Observer Log	■

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FORM 1

Record of initial verbal notification to NOPSEMA



NOPSEMA ph: [REDACTED]

Date of call	
Time of call	
Call made by	
Call made to	

Information to be provided to NOPSEMA:

Date and Time of incident/time caller became aware of incident	
Details of incident	<ol style="list-style-type: none"> 1. Location _____ 2. Title _____ 3. Hydrocarbon source <ul style="list-style-type: none"> <input type="checkbox"/> Platform _____ <input type="checkbox"/> Pipeline _____ <input type="checkbox"/> FPSO _____ <input type="checkbox"/> Exploration drilling _____ <input type="checkbox"/> Well _____ <input type="checkbox"/> Other (please specify) _____ 4. Hydrocarbon type _____ 5. Estimated volume of hydrocarbon _____ 6. Has the discharge ceased? _____ 7. Fire, explosion or collision? _____ 8. Environment Plan(s) _____ 9. Other Details _____
Actions taken to avoid or mitigate environmental impacts	

Corrective actions taken or proposed to stop, control or remedy the incident	
---	--

After the initial call is made to NOPSEMA, please send this record as soon as practicable to:

- 1. NOPSEMA [REDACTED]
- 2. NOPTA [REDACTED]
- 3. DMIRS [REDACTED]

FORM 2

[insert NOPSEMA Notification Template when printing]



FORM 3

[insert Marine Pollution Report (POLREP – AMSA) when printing]



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FORM 4

[insert AMOSC Service Contract note when printing]



FORM 5

[insert Marine Pollution Report (POLREP – DoT) when printing]



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FORM 6a

[insert OSRL Initial Notification Form when printing]



FORM 6b

[insert OSRL Mobilisation Activation Form when printing]



FORM 7

[insert RPS Response Oil Spill Trajectory Modelling Request form when printing]



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FORM 8

[insert Aerial Surveillance Observer Log when printing]



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APPENDIX C – 7 QUESTIONS OF SPILL ASSESSMENT

<p>WHAT IS IT? Oil Type/name Oil properties Specific gravity / viscosity / pour point / asphaltines / wax content / boiling point</p>	
<p>WHERE IS IT? Lat/Long Distance and bearing</p>	
<p>HOW BIG IS IT? Area Volume</p>	
<p>WHERE IT IS GOING? Weather conditions Currents and tides</p>	
<p>WHAT IS IN THE WAY? Resources at risk</p>	
<p>WHEN WILL IT GET THERE? Weather conditions Currents and tides</p>	
<p>WHAT'S HAPPENING TO IT? Weathering processes</p>	

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APPENDIX D – TRACKING BUOY DEPLOYMENT INSTRUCTIONS

(Insert  when printing)

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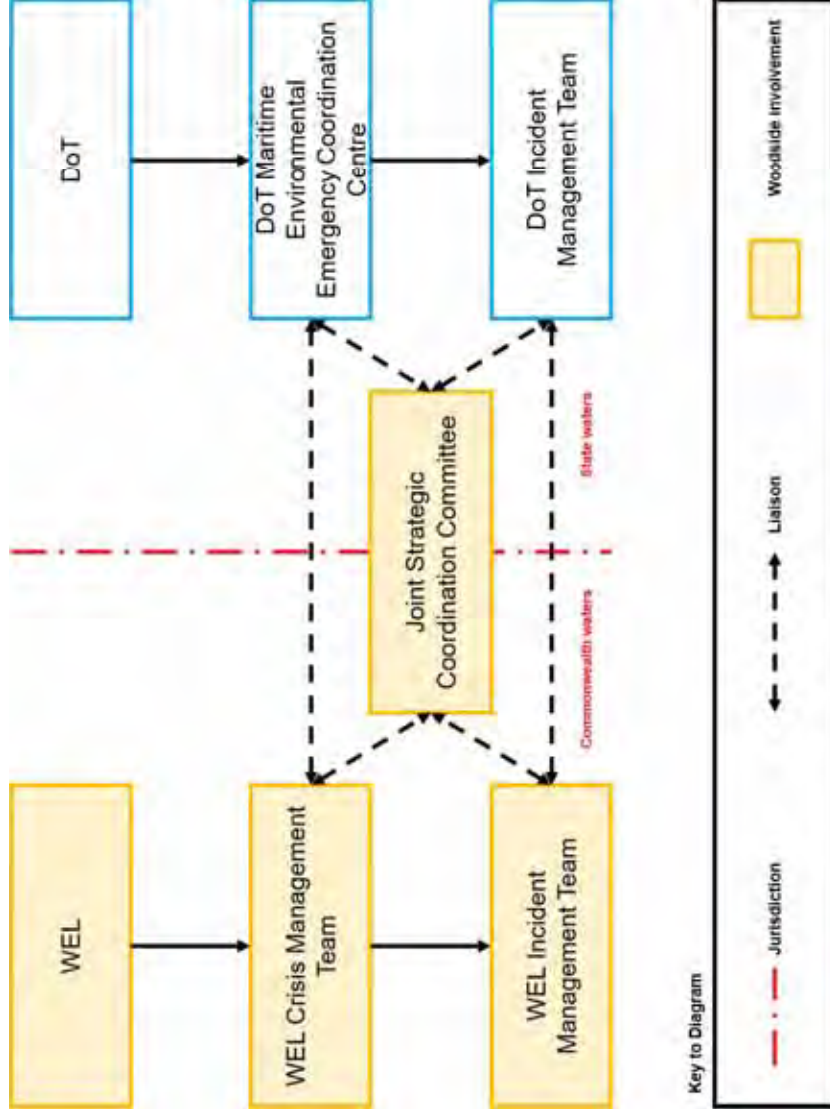
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APPENDIX E – COORDINATION STRUCTURE FOR A CONCURRENT HYDROCARBON SPILL IN BOTH COMMONWEALTH AND STATE WATERS/SHORELINES⁴



The Control Agency for a hydrocarbon spill in Commonwealth waters resulting from an offshore petroleum activity is AMSA. The Control Agency for a hydrocarbon spill in State waters/shorelines resulting from an offshore petroleum activity in Commonwealth waters is DoT for a Level 2/3 spill. DoT will appoint an Incident Controller and form a separate IMT to only manage the spill within State waters/shorelines.

⁴Adapted from DoT Offshore Petroleum Industry Guidance Note, Marine Oil Pollution: Response and Consultation Arrangements July 2020. Note: For full structure up to Commonwealth Cabinet/Minister refer to Marine Oil Pollution: Response and Consultation Arrangements Section 6.5, Figure 3.

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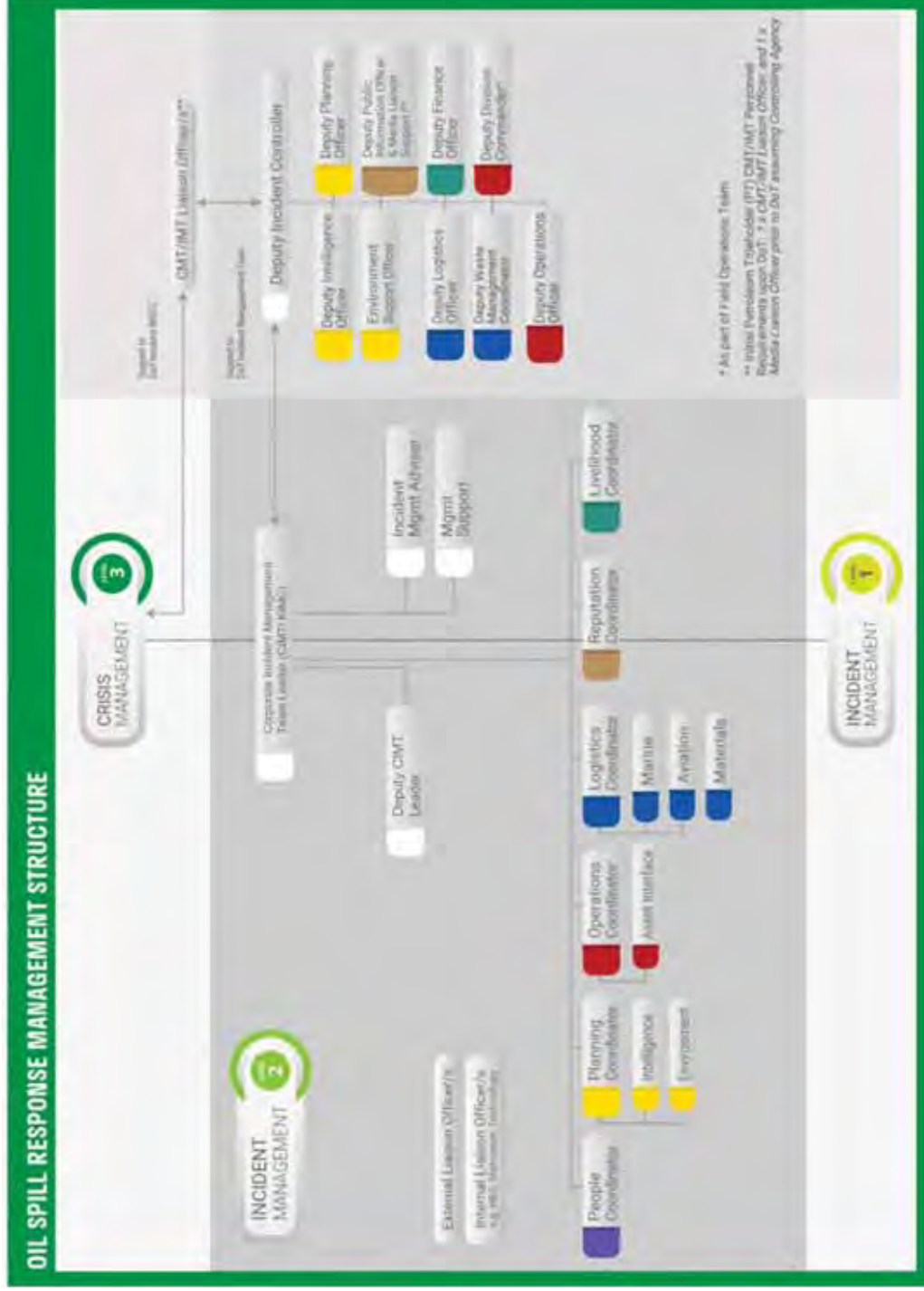
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APPENDIX F – WOODSIDE INCIDENT MANAGEMENT STRUCTURE

Woodside Incident Management Structure for Hydrocarbon Spill (including Woodside Liaison Officers Command Structure within DoT IMT if required).



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APPENDIX G – WOODSIDE LIASON OFFICER RESOURCES TO DOT

Once DoT activates a State waters/shorelines IMT, Woodside will make available the following roles to DoT.

Area	WEL Liaison Role	Personnel Sourced from ⁵ :	Key Duties	#
DoT MEECC	CMT Liaison Officer	CIMT Leader Roster	<ul style="list-style-type: none"> Provide a direct liaison between the CMT and the MEECC. Facilitate effective communications and coordination between the CMT Leader and State Marine Pollution Coordinator (SMPC). Offer advice to SMPC on matters pertaining to PT crisis management policies and procedures. 	1
DoT IMT Incident Control	WEL Deputy Incident Controller	CIMT Leader Roster	<ul style="list-style-type: none"> Provide a direct liaison between the PT IMT and DoT IMT. Facilitate effective communications and coordination between the PT IC and the DoT IC. Offer advice to the DoT IC on matters pertaining to PT incident response policies and procedures. Offer advice to the Safety Coordinator on matters pertaining to PT safety policies and procedures, particularly as they relate to PT employees or contractors operating under the control of the DoT IMT. 	1
DoT IMT Intelligence	Intelligence Support Officer/ Deputy Intelligence Officer	Intelligence Coordinator Roster	<ul style="list-style-type: none"> As part of the Intelligence Team, assist the Intelligence Officer in the performance of their duties in relation to situation and awareness. Facilitate the provision of relevant modelling and predications from the PT IMT. Assist in the interpretation of modelling and predications originating from the PT IMT. Facilitate the provision of relevant situation and awareness information originating from the DoT IMT to the PT IMT. Facilitate the provision of relevant mapping from the PT IMT. Assist in the interpretation of mapping originating from the PT IMT. Facilitate the provision of relevant mapping originating from the DoT IMT to the PT IMT. 	1
DoT IMT Intelligence – Environment	Environment Support Officer	Environment Coordinator Roster	<ul style="list-style-type: none"> As part of the Intelligence Team, assist the Environment Coordinator in the performance of their duties in relation to the provision of environmental support into the planning process. Assist in the interpretation of the PT OPEP and relevant TRP plans. Facilitate in requesting, obtaining and interpreting environmental monitoring data originating from the PT IMT. Facilitate the provision of relevant environmental information and advice originating from the DoT IMT to the PT IMT. 	1
DoT IMT Planning-Plans/Resources	Deputy Planning Officer	Planning Coordinator Roster	<ul style="list-style-type: none"> As part of the Planning Team, assist the Planning Officer in the performance of their duties in relation to the interpretation of existing response plans and the development of incident action plans and related sub plans. Facilitate the provision of relevant IAP and sub plans from the PT IMT. 	1

⁵ These positions would be mobilised, in consultation with DoT, to align to the actual spill scenario. The selected roles and/or individual personnel would be subject to continued evaluation to ensure continued 'best fit'. For CIMT/KIMC roster arrangements, contact the WCC. During a prolonged response, additional personnel may be sourced through AMOSC Core Group via [REDACTED]

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Area	WEL Liaison Role	Personnel Sourced from ⁵ :	Key Duties	#
DoT IMT Public Information-Media/Community Engagement	Public Information Support and Media Liaison Officer/ Deputy Public Information Officer	Reputation Coordinator Roster	<ul style="list-style-type: none"> Assist in the interpretation of the PT OPEP from the PT. Assist in the interpretation of the PT IAP and sub plans from the PT IMT. Facilitate the provision of relevant IAP and sub plans originating from the DoT IMT to the PT IMT. Assist in the interpretation of the PT existing resource plans. Facilitate the provision of relevant components of the resource sub plan originating from the DoT IMT to the PT IMT. <p>(Note this individual must have intimate knowledge of the relevant PT OPEP and planning processes)</p> <ul style="list-style-type: none"> As part of the Public Information Team, provide a direct liaison between the PT Media team and DoT IMT Media team. Facilitate effective communications and coordination between the PT and DoT media teams. Assist in the release of joint media statements and conduct of joint media briefings. Assist in the release of joint information and warnings through the DoT Information and Warnings team. Offer advice to the DoT Media Coordinator on matters pertaining to PT media policies and procedures. Facilitate effective communications and coordination between the PT and DoT Community Liaison teams. Assist in the conduct of joint community briefings and events. Offer advice to the DoT Community Liaison Coordinator on matters pertaining to the PT community liaison policies and procedures. Facilitate the effective transfer of relevant information obtained from through the Contact Centre to the PT IMT. 	1
DoT IMT Logistics	Deputy Logistic Officer	Logistics Coordinator Roster	<ul style="list-style-type: none"> As part of the Logistics Team, assist the Logistics Officer in the performance of their duties in relation to the provision of supplies to sustain the response effort. Facilitate the acquisition of appropriate supplies through the PTs existing OSRL, AMOSC and private contract arrangements. Collects Request Forms from DoT to action via PT IMT. <p>(Note this individual must have intimate knowledge of the relevant PT logistics processes and contracts)</p>	1
DoT IMT Finance-Accounts/Financial Monitoring	Deputy Finance Officer	Livelihood Coordinator Roster	<ul style="list-style-type: none"> As part of the Finance Team, assist the Finance Officer in the performance of their duties in relation to the setting up and payment of accounts for those services acquired through the PTs existing OSRL, AMOSC and private contract arrangements. Facilitate the communication of financial monitoring information to the PT to allow them to track the overall cost of the response. Assist the Finance Officer in the tracking of financial commitments through the response, including the supply contracts commissioned directly by DoT and to be charged back to the PT. 	1

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Area	WEL Liaison Role	Personnel Sourced from ⁵ :	Key Duties	#
DoT IMT Operations	Deputy Operations Officer	Operations Coordinator Roster	<ul style="list-style-type: none"> As part of the Operations Team, assist the Operations Officer in the performance of their duties in relation to the implementation and management of operational activities undertaken to resolve an incident. Facilitate effective communications and coordination between the PT Operations Section and the DoT Operations Section. Offer advice to the DoT Operations Officer on matters pertaining to PT incident response procedures and requirements. Identify efficiencies and assist to resolve potential conflicts around resource allocation and simultaneous operations of PT and DoT response efforts. 	1
DoT IMT Operations – Waste Management	Facilities Support Officer/ Deputy Waste Management Coordinator	Logistics Materials Coordinator Roster	<ul style="list-style-type: none"> As part of the Operations Team, assist the Waste Management Coordinator in the performance of their duties in relation to the provision of the management and disposal of waste collected in State waters. Facilitate the disposal of waste through the PT's existing private contract arrangements related to waste management and in line with legislative and regulatory requirements. Collects Request Forms from DoT to action via PT IMT. 	1
DoT FOB Operations Command	Deputy On-Scene Commander/ Deputy Division Commander	CIMT Leader Roster	<ul style="list-style-type: none"> As part of the Field Operations Team, assist the Division Commander in the performance of their duties in relation to the oversight and coordination of field operational activities undertaken in line with the IMT Operations Section's direction. Provide a direct liaison between the PT FOB and DoT FOB. Facilitate effective communications and coordination between the PT Division Commander and the DoT Division Commander. Offer advice to the DoT Division Commander on matters pertaining to PT incident response policies and procedures. Assist the Safety Coordinator deployed in the FOB in the performance of their duties, particularly as they relate to PT employees or contractors. Offer advice to the Safety Coordinator deployed in the FOB on matters pertaining to PT safety policies and procedures. 	1
Total Woodside personnel initially required in DoT IMT				11

DoT Liaison Officer Resources to Woodside

Once DoT activates a State waters/shorelines IMT, DoT will make available the following roles to Woodside.

Area	DoT Liaison Role	Personnel Sourced from:	Key Duties	#
WEL CMT	DoT Liaison Officer (prior to DoT assuming Controlling Agency) / Deputy Incident Controller – State waters (after DoT assumes Controlling Agency)	DoT	<ul style="list-style-type: none"> Facilitate effective communications between DoT's SMPC/ Incident Controller and the Petroleum Titleholder's appointed CMT Leader / Incident Controller. Provide enhanced situational awareness to DoT of the incident and the potential impact on State waters. Assist in the provision of support from DoT to the Petroleum Titleholder. Facilitate the provision technical advice from DoT to the Petroleum Titleholder Incident Controller as required. 	1
WEL Reputation FST (Media Room)/ Public Information – Media	DoT Media Liaison Officer	DoT	<ul style="list-style-type: none"> Provide a direct liaison between the PT Media team and DoT IMT Media team. Facilitate effective communications and coordination between the PT and DoT media teams. Assist in the release of joint media statements and conduct of joint media briefings. • Assist in the release of joint information and warnings through the DoT Information & Warnings team. Offer advice to the PT Media Coordinator on matters pertaining to DoT and wider Government media policies and procedures. 	1
Total DoT Personnel Initial Requirement to Woodside				2

Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan

Document No: A855184

Date: 31/07/2022

1. On 31 July 2023, I, [REDACTED], Environment Manager – Offshore Projects and Seismic within the National Offshore Petroleum Safety and Environmental Management Authority (**NOPSEMA**), delegate of the Chief Executive Officer of NOPSEMA decided, pursuant to regulation 10 of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth) (**Regulations**), to accept, subject to conditions, the Scarborough 4D B1 Marine Seismic Survey Environment Plan (Revision 7, June 2023) (**Environment Plan**). The Environment Plan was submitted by Woodside Energy Scarborough Pty Ltd (ACN 650 177 227) and Woodside Energy (Australia) Pty Ltd (ACN 006 923 879) (**titleholders**), to enable the titleholders to undertake a new three-dimensional marine seismic survey (**MSS**)/baseline 4D MSS in the Northern Carnarvon Basin on the Exmouth Plateau located in Commonwealth waters 188 km north-west of Northwest Cape, Western Australia (**activity**).
2. The reasons for my decision are set out below. All references to a regulation (**reg**) are to the Regulations unless otherwise stated.

Legislative Framework

3. The legislation relevant to my decision is set out in **Attachment A**.

Background

4. On 11 October 2021, the titleholders submitted an Environment Plan (Revision 0, October 2021) to NOPSEMA in accordance with reg 9(1).
5. On 18 October 2021, the Environment Plan (Revision 0, October 2021) was published by NOPSEMA on its website for public comment, in accordance with reg 9AB. The period for public comment closed on 17 November 2021, with no public comments being received during this period.
6. On 22 November 2021, following the completion of the 30-day public comment process, the titleholders resubmitted the Environment Plan (Revision 0, October 2021) to NOPSEMA in accordance with reg 9(1).
7. Between 16 December 2021 and 18 April 2023, NOPSEMA issued four not reasonably satisfied notices requiring the titleholders to modify and resubmit the Environment Plan, pursuant to reg 10. In addition, NOPSEMA made four requests for further information during this timeframe, pursuant to reg 9A. The not reasonably satisfied notices identified areas where NOPSEMA considered the Environment Plan did not meet the criteria in reg 10A. The requests for further information outlined areas where further information was required about matters required by the regulations before a decision could be made against the reg 10A criteria. In response to these requests, the titleholders resubmitted seven environment plans which incorporated additional information pursuant to reg 9A(3) and modifications pursuant to reg 10. The Environment Plan the subject of this decision was received on 2 June 2023, and is identified as Revision 7, June 2023.

Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan

8. On 13 July 2023, NOPSEMA wrote to the titleholders providing an opportunity to review the draft conditions which may be imposed if I were to find that the criteria in reg 10A were not met. This afforded procedural fairness to the titleholders and to ensure the conditions were clear and could be implemented. On 26 July 2023, the titleholders responded with a number of comments on the draft conditions and NOPSEMA took these into consideration when finalising the conditions but did not change the scope and intent of the conditions.

Materials

9. The materials which I considered in making my decision are set out in **Attachment B**. Where relevant to my decision, I identify these materials in my reasons below.

Decision Overview

10. The issue before me was whether the Environment Plan should be accepted under reg 10.
11. Prior to considering whether I was reasonably satisfied that the Environment Plan met the criteria in reg 10A, I considered whether the Environment Plan complied with Division 2.3, which sets out the matters which must be included in the Environment Plan.
12. I am satisfied that the Environment Plan contained the matters in Division 2.3. My reasons are set out at [16]-[32] below.
13. I then considered whether I was reasonably satisfied that the Environment Plan meets each of the criteria in reg 10A.
14. If I was reasonably satisfied that the Environment Plan met the criteria in reg 10A, I must accept it. However, if I was not reasonably satisfied that the Environment Plan met the criteria in reg 10A, I must:
 - a. give the titleholders the opportunity to resubmit the Environment Plan; or
 - b. refuse to accept the Environment Plan; or
 - c. accept the Environment Plan in part for a particular stage of the activity; or
 - d. accept the Environment Plan subject to limitations or conditions applying to operations for the activity.
15. I considered that the criteria in reg 10A were not all satisfied. However, I exercised my discretion to accept the Environment Plan, subject to conditions. My reasons are set out at [33]-[132] below.

Findings

Does the Environment Plan comply with Division 2.3?

16. Reg 12 requires that an Environment Plan must include the matters set out in regs 13-16. As I was satisfied that the Environment Plan met regs 13-16 (for the reasons set out individually below), I was satisfied that reg 12 was met, and that the Environment Plan complied with Division 2.3.

Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan

Regulation 13 – Environmental Assessment*Regulation 13(1) - Description of the activity*

17. Section 3 of the Environment Plan is titled 'Description of Activity' and included the following information:
- a. the description of the activity as a new three-dimensional (3D) marine seismic survey (MSS)/baseline 4D MSS that will be acquired in the Northern Carnarvon Basin on the Exmouth Plateau located in Commonwealth waters 188 km north-west of Northwest Cape (section 3.3), Western Australia in waters 800 to 1150 metres of depth (section 3.3.2);
 - b. the location of the activity is clearly set out in the Environment Plan by figures and tables that include the coordinates for the operational area (9,200 km²) and active source area (5,650km²) of the MSS (section 3.3.1 and 3.3.2);
 - c. the activity will be undertaken using up to three project vessels powered by marine diesel oil (MDO); a seismic vessel (~110 m long), a support vessel (~65 m long) to be used to re-supply and other logistical and operational activities, and a chase vessel (~22 m long) to manage interactions with shipping or fishing activities, with representative vessel specifications for each type of vessel provided in the Environment Plan (section 3.5.5);
 - d. information considered relevant for the consideration of environmental impacts and risks (such as the operational details of the activity and proposed timetable) (sections 3.4 and 3.5), including:
 - i. the timing and duration of the activity, which is 24-hours/day over an 80-day period between the date the Environment Plan is accepted and 31 December 2023 (inclusive). Further, the number of days for acquisition at full power, is a maximum of 70 days and 10 days of contingency have been allowed for vessel or equipment downtime and adverse weather conditions;
 - ii. the survey design, which includes sail lines with a maximum length of up to 105 km separated by approximately 450 m and either orientated at 24 deg/205 deg or 40.5 deg/220.5 deg (section 3.6);
 - iii. the source configuration, which is triple or dual source, while the frequency range of source arrays is 2 to 200 Hz;
 - iv. the approximate airgun array capacity, which is a maximum of 3150 cubic inches (cui) and the operating pressure of the airgun array, which is a maximum of 2,000 pounds per square inch (psi);
 - v. the tow depth of airgun array, which is a 6 to 8 m +/- 1 below the sea surface and the shot point interval of airgun arrays, which is 12.5 m (triple source) (every 5 to 6 seconds) or 18.75 m (dual source); and
 - vi. the hydrophone type, which is a maximum of 14 solid hydrophone streamers with an approximate length of 8,000 m, towed approximately 500 m behind the vessel, positioned an approximate distance of 50 to 100 m apart and fitted with active steering and streamer recovery devices. Further, the tow depth of hydrophone streamers, which is

Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan

approximately 15 to 25 m below the sea surface and the towing speed, which is 4 to 5 knots (7.4 km/hour).

18. I was satisfied that this information provided a comprehensive description of the activity, with a large amount of detail in relation to each of the matters in reg 13(1).

Regulation 13(2) and (3) - Description of the environment

19. Reg 13(2) and (3) requires the Environment Plan to describe the existing environment that may be affected by the activity and include details of the particular relevant values and sensitivities (if any) of that environment. The Environment Plan addressed each of these matters in Section 4, Appendix C and Appendix H. In particular, the Environment Plan described and included the following information:
- a. that the environment that may be affected by the activity is defined by an operational and acquisition area in which the vessel and equipment used by the activity will be physically present (**Operational Area**), and an environment that may be affected (**EMBA**) is defined as the largest spatial extent where unplanned hydrocarbon release could have an environmental consequence, and which also encompasses the area over which acoustic emissions exceed behavioural impact thresholds (section 4.1);
 - b. that the regional setting of the area that may be affected by the activity, including under emergency conditions, is the North-west marine region (**NWMR**) as defined under the Integrated Marine and Coastal Regionalisation of Australia bioregions. The operational area lies within the Northwest Province and the EMBA partially overlaps with additional provincial bioregions of the NWMR including the Northwest Transition, Central Western Transition, Northwest Shelf Province, and Central Western Shelf Transition. The southern tip of the EMBA enters the South-west Marine Region, and Central Western Province provincial bioregion (section 4.2);
 - c. the Department of Climate Change, Energy, the Environment and Water EPBC Protected Matters Search Tool (**PMST**), which evidenced that that the activity or any part of the activity will not be undertaken in any part of a declared World Heritage Property or National Heritage Place, nor a declared Ramsar wetland, within the meaning of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**);
 - d. the PMST, identifying 27 listed threatened species and 43 listed migratory species (or their habitat) that are known to occur, may occur or are likely to occur in the area that may be affected by the activity, including under emergency conditions. Two conservation-dependent species are also identified with a potential to occur within the Operational Area and EMBA, including the scalloped hammerhead shark and the southern bluefin tuna (section 4.6);
 - e. the biologically important areas (**BIAs**) and habitat critical to survival (**HCTS**) for species in the area that may be affected by the activity within the broader EMBA, including under emergency conditions. They include a whale shark foraging BIA, pygmy blue whale migration and possible foraging BIAs, a humpback whale migration BIA, seabird and migratory shore bird breeding and foraging BIAs, internesting buffer BIAs for four species of marine turtles (flatback, green, hawksbill and loggerhead) and HCTS for three marine turtle species (green, flatback and hawksbill). The Operational Area and EMBA also overlap with the known distribution range for pygmy blue whales, noting that the closest boundary of the pygmy blue whale migration BIA is located 14 km south-east of the Operational Area (section 4.6);

Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan

- f. the values and sensitivities of the Key Ecological Features (**KEFs**) in the area that may be affected by the activity, including under emergency conditions. KEFs within the EMBA include the Canyons linking the Cuvier Abyssal Plain and the Cape Range Peninsula KEF, Continental slope demersal fish communities KEF and the Exmouth Plateau KEF. The operational area for the activity is located entirely on the Exmouth Plateau KEF, which is a distinctive geomorphic feature containing topographic features including terraces, canyons, and pinnacles, noting that the topography of the Exmouth Plateau KEF is thought to modify deep water flow and contribute to upwelling of deep nutrient-rich waters (section 4.8);
 - g. in section 4.9, the Australian Marine Parks (**AMPs**) in the area that may be affected by the activity, including under emergency conditions. Within the broader EMBA there was overlap with the Gascoyne AMP (Multiple Use Zone (IUCN VI), National Park Zone (IUCN II) and Habitat Protection Zone (IUCN IV)) and Montebello AMP (Multiple Use Zone (IUCN VI)) (section 4.9);
 - h. the Commonwealth and Western Australian managed fisheries in the area that may be affected by the activity, including under emergency conditions, including the Southern Bluefin Tuna Fishery, Western Skipjack Tuna Fishery, Western Tuna and Billfish Fishery, Western Deepwater Trawl Fishery, North West Slope Trawl Fishery, Mackerel Managed Fishery, Pilbara Line Managed Fishery, Pilbara Trap Managed Fishery, Pilbara Fish Trawl (Interim) Managed Fishery, South West Coast Salmon Managed Fishery, Marine Aquarium Managed Fishery, West Coast Deep Sea Crustacean Managed Fishery, Pearl Oyster Managed Fishery, Pilbara Crab Managed Fishery and West Coast Rock Lobster Managed Fishery (section 4.10); and
 - i. in section 4.10, the social, economic, and cultural features of the environment that may be affected by the activity, including First Nations cultural heritage, maritime archaeological heritage, traditional fishing activities, tourism and recreation activities, oil and gas activities, commercial shipping activities and defence activities have been identified and described.
20. In light of the matters identified immediately above, I was satisfied that the Environment Plan met the requirements in regs 13(2) and (3).

Regulation 13(4) - Requirements

21. I noted that the Environment Plan provided a detailed table at Appendix B identifying various Commonwealth acts and regulations that apply to the activity. Various parts of the Environment Plan, in particular sections 1.9 (Requirements), 4 (Environment), 6 (Impact and Risk Assessment), 6.8 (EPBC Act Assessment) and Appendix H (Master Description of Existing Environment), provide descriptions of the legislative requirements that apply to the activity and how they are relevant to the environment management of the activity. The Environment Plan demonstrates that relevant legislative requirements will be met by directly addressing them in the demonstration of acceptable levels of impacts and risks (section 6). I was therefore satisfied that reg 13(4) was met.

Regulation 13(5) and (6) - Evaluation of environmental impacts and risks

22. Section 6 of the Environment Plan detailed the environmental impacts and risks, including those arising from potential emergency conditions whether resulting from accident or any other reason, for the activity which is provided in section 6 of the EP. The details of the environmental impacts and risks associated with the activity were included in Table 6-1 of the Environment Plan, and included:
- a. planned activities such as physical presence to marine users, routine acoustic emissions from seismic survey equipment and from project vessels, routine atmospheric and greenhouse gas

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emissions, routine discharge of bilge water, grey water, deck drainage water, sewage, and putrescible wastes and routine light emissions from external lighting on project vessels; and

- b. unplanned aspects such as accidental hydrocarbon release due to vessel collision or from bunkering, unplanned discharge of deck spills or solid hazardous and non-hazardous wastes including dropped objects, vessel collision with or entanglement with marine fauna, loss of equipment and introduction and establishment of invasive marine species.
23. The Environment Plan contained an evaluation of all the impacts and risks, whether arising directly or indirectly, and including those arising from potential emergency conditions whether resulting from accident or any other reason, appropriate to the nature and scale of each impact or risk. The impact and risk analysis process is described in Section 2.6 and includes assigning a consequence rating (defined in Table 2-3) for all impacts and risks and a likelihood rating (defined in Table 2-4) for unplanned events, which together were used to categorise planned and unplanned activities into a rating for the acceptability of the impact or risk (defined in Table 2-6). A description was provided in Table 2-5 about how the titleholders demonstrates that the impacts and risks will be managed to ALARP. The outcome of the process for the impacts and risks identified in [22] is summarised in Table 6-1, with the impacts and risks generated by the activity that are identified in [22] being considered to be acceptable or broadly acceptable when taking into account the application of control measures and considering the extent, severity and duration of any planned or unplanned impacts to environmental receptors. The full evaluation of each individual impact and risk is provided in Section 6 of the EP.
24. Examples of details of the control measures that will be used to reduce the impacts and risks of the activity to as low as reasonably practicable and an acceptable level that were included in the Environment Plan include control measures used to raise awareness to other marine users about the activity to manage on water interactions; people, procedures and equipment that will be used to mitigate the impacts of noise on marine fauna; equipment to be used, marine standards to be applied and emergency procedures in place to manage impacts from any vessel discharges, procedures to be used, standards to be applied and equipment to be used to avoid vessel strike with marine fauna.
25. In light of the matters above, I was satisfied that the requirements of reg 13(5) and (6) were met.

Regulation 13(7) - Environmental performance outcomes and standards

26. I considered the environmental performance outcomes and standards (**EPOs**), the environmental performance standards (**EPS**) and measurement criteria provided in section 6 of the Environment Plan and was satisfied that the:
- a. EPOs have been set which define performance for the management of the environment aspects of the activity. For example, EPO2 Prevent adverse interactions between vessels and other marine users during the Petroleum Activities Program, EPO9 No impact to water quality greater than consequence level of F (defined as no lasting effect < 1 month) or negligible impact, localised impact not significant to environmental receptors, EPO10 No release of hydrocarbons to the marine environment due to a vessel collision during the Petroleum Activities Program, EPO14 No vessel strikes with marine fauna (whales, whale sharks and turtles) during the Petroleum Activities Program, EPO16 No introduction and establishment of invasive marine species into the Operational Area as a result of the Petroleum Activities Program;
 - b. EPSs, which are statements of performance for the control measures, have been set for all control measures identified as being necessary to reduce the environmental impacts and risks of the activity to as low as reasonably practicable and acceptable levels. Examples of EPSs include limitations on the extent of the activity (e.g. no operation of the seismic source within

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25 km of the pygmy blue whale migration BIA), mandatory use of vessels/equipment/people at all times during the survey (e.g. two dedicated MFOs per observing vessel (survey vessel and spotter vessel), use of turtle guards on streamer tail-buoys), compliance with regulations (e.g. EPBC Regulations 2000 – Part 8 Division 8.1, Australian Ballast Water Management Requirements and Marine Orders); and

- c. measurement criteria (e.g. records of equipment being present, evidence of compliance with regulations, standards and procedures, evidence of notifications being sent to marine users) are provided that will allow the titleholders to determine whether each EPO and EPS is being met for the duration of the activity.

27. Based on the findings above, I was reasonably satisfied that the requirements of reg 13(7) are met.

Regulation 14 - Implementation strategy for the EP

28. In relation to the requirements in reg 14, Section 7 of the Environment Plan details that:

- a. the implementation strategy includes a commitment in Section 7.9.4 to report to the NOPSEMA in relation to the titleholders' environmental performance for the activity monthly for recordable incidents and then within three months of completing the activity (reg 14(2));
- b. the implementation strategy contains the key elements of an environmental management system (EMS) for the activity, which is described in Section 2.11. This includes specific measures to ensure that the environmental impacts and risks of the activity continue to be identified and reduced to a level that is as low as reasonably practicable and control measures described in the Environment Plan are effective in reducing the environmental impacts and risks of the activity to as low as reasonably practicable and an acceptable level, and EPOs and EPSs set out in the Environment Plan are being met (reg 14(3)). Key examples of these measures include ongoing monitoring of compliance with environmental performance outcomes and environmental performance standards and environmental performance auditing. The EP review and management of change processes are described in Sections 7.5.4 and 7.6;
- c. the implementation strategy establishes a clear chain of command, setting out the roles and responsibilities of personnel in relation to the implementation, management and review of the Environment Plan, including during emergencies or potential emergencies (reg 14(4)). For example, Section 7.3 outlines the organisation structure and the roles and responsibilities of key project team members including responsibilities for environmental performance monitoring and reporting (Table 7-1). The roles and responsibilities of key personnel involved in spill preparation and response are outlined in Appendix D;
- d. the implementation strategy includes measures to ensure that each employee or contractor working on, or in connection with, the activity is aware of their responsibilities in relation to the Environment Plan, including during emergencies or potential emergencies, and has the appropriate competencies and training (reg 14(5)). For example, the titleholders has made commitments to inductions and pre-activity meetings to raise awareness of Environment Plan responsibilities in Section 7.4, which also outlines the measures that are in place for ensuring employee and contractor competency, including the necessary awareness, training and induction requirements to fulfil their duties;
- e. the implementation strategy provides for sufficient monitoring, recording, audit, management of nonconformance and review of the titleholders' environmental performance and the implementation strategy to ensure that the EPOs and EPSs in the Environment Plan are being

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met (Sections 7.5 to 7.9) (reg 14(6)). For example, internal and external reporting obligations are identified and the titleholders commits to conducting a program of periodic monitoring, auditing and marine assurance for the duration of the activity and outcomes of these processes may lead to management review or change and revision;

- f. the implementation strategy provides for sufficient monitoring of, and maintaining a quantitative record of, emissions and discharges (whether occurring during normal operations or otherwise), such that the record can be used to assess whether the EPOs and EPSs in the Environment Plan are being met (reg 14(7)), this record is stated to be in the daily seismic reports (Section 7.8);
- g. the implementation strategy contains an oil pollution emergency plan (OPEP) that includes the following components: Woodside Oil Pollution Emergency Arrangements (Australia), which is a framework for response arrangements from shipping sourced spills in the Commonwealth waters consistent with the National Plan for Maritime Environmental Emergencies and for marine oil pollution incidents in WA State waters consistent with the WA State Hazard Plan for Maritime Environmental Emergencies; an Oil Spill Preparedness and Response Mitigation Assessment (Appendix D) and an Oil Pollution First Strike Plan (Appendix I) and provides for the updating of the plan (Section 7.7) (reg 14(8));
- h. the OPEP (Appendix D) includes adequate arrangements for responding to and monitoring oil pollution and includes:
 - i. the control measures necessary for timely response to an emergency that results or may result in oil pollution;
 - ii. the arrangements and capability that will be in place for the duration of the activity to ensure timely implementation of the control measures including arrangements of ongoing maintenance of response capability;
 - iii. the arrangements and capability that will be in place for monitoring the effectiveness of the control measures and ensuring that the EPSs for the control measures are met; and
 - iv. the arrangements and capability in place for monitoring oil pollution to inform response activities (reg 14(8AA));
- i. the implementation strategy includes arrangements for testing the response arrangements in the OPEP that are appropriate to the response arrangements and to the nature and scale of the risk of oil pollution for the activity (Section 7.11.1 and 2 and Appendix D) (reg 14(8A));
- j. the arrangements for testing the response arrangements includes a statement of the objectives of testing, a proposed schedule of tests, mechanisms to examine the effectiveness of response arrangements against the objectives of testing, and mechanisms to address recommendations arising from tests. These tests are the titleholders' common arrangements for spill response across its Australian operating assets and activities (Table 7-7 and Figure 7-1) (reg 14(8B));
- k. the proposed schedule of tests provides for:
 - i. testing the response arrangements when they are introduced;
 - ii. testing the response arrangements when they are significantly amended;

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- iii. testing the response arrangements not later than 12 months after the most recent test;
 - iv. if a new location for the activity is added to the Environment Plan after the response arrangements have been tested, and before the next test is conducted – testing the response arrangements in relation to the new location as soon as practicable after it is added to the plan; and
 - l. the implementation strategy provides for monitoring of impacts to the environment from oil pollution and response activities that is appropriate to the nature and scale of the risk of the environmental impacts and risks for the activity and is sufficient to inform any remediation activities (Appendix D) (reg 14(8D));
 - m. the arrangements established in Appendix D and Appendix I are consistent with the national system for oil pollution preparedness and response, as outlined in Woodside Oil Pollution Emergency Arrangements (Australia) (reg 14(8E));
 - n. the implementation strategy provides for appropriate ongoing consultation during the implementation of the petroleum activity with relevant authorities of the Commonwealth, a State or Territory and other relevant interested persons or organisations (reg 14(9)). In particular, Section 5.6 and Section 7.9.2.1 outline the arrangements for ongoing stakeholder consultation. The EP also provides for ongoing consultation with relevant cultural authorities in relation to the identification, assessment, and consideration of cultural values relevant to the petroleum activity (Table 7-2); and
 - o. the implementation strategy complies with the Act, the regulations and any other environmental legislation applying to the activity (as outlined in Section 1.9 and Appendix B) (reg 14(10)).
29. Based on the findings above, I was reasonably satisfied that the requirements of reg 14 are met.

Regulation 15 - Details of titleholders and liaison person

30. Section 1.7 of the Environment Plan, headed 'Details of Titleholders and Public Affairs Contact' relevantly:
- a. includes a heading 'Titleholder' identifying Woodside Energy Scarborough Pty Ltd, and providing the relevant address and contact details, in addition to the ACN;
 - b. under the heading 'Nominated Liaison Person' includes the relevant address and contact details; and
 - c. confirms that any changes to the details provided under Section 1.7 will be communicated in writing within 2 weeks or as soon as reasonably practicable.
31. In light of the inclusion of the above matters in the Environment Plan, I am satisfied reg 15 was met.

Regulation 16 - Other information in the EP

32. I considered that the Environment Plan met reg 16 as it contained:
- a. a statement of the titleholders' corporate environmental policy in section 1.8 and Appendix A;

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- b. the information required under reg 16(b) relating to all consultations under reg 11A of any relevant person by the titleholders in section 5, appendix F (which contains over 100 consultation communications) and the sensitive information part of the Environment Plan; and
- c. details of any reportable incidents in relation to the proposed activity in section 7.9.7.

Should the Environment Plan be accepted?

33. Reg 10 of the Regulations requires that when making my decision as to whether the Environment Plan should be accepted, refused or accepted in part or with conditions I must consider:
 - a. the further information that the titleholders had provided under reg 9A(3). The information which I considered was contained in the various resubmitted environment plans, which resulted in the Environment Plan; and
 - b. any public comments received under reg 11B(2) of the Regulations. No comments were received.
34. I understood that, pursuant to reg 11B(6)(b), I was unable to take into account any other public comments that had been received in relation to the activity. I have not done so.
35. Against this background (and having considered the materials at Attachment B), I made the following findings against each criteria.

Regulation 10A(a) - The Environment Plan is appropriate for the nature and scale of the activity

36. I noted that the Environment Plan includes a description of the scope and bounds of the activity. In particular, the Environment Plan provides details of the proposed location, spatial extent, timeframe, and duration of the activity and clearly defines the limits of the survey acquisition parameters for the activity (see above at [17]).
37. I considered that the Environment Plan contained a thorough description of the activity components with the greatest potential to generate impacts and risks to the environment throughout the activity duration. In particular, the Environment Plan thoroughly applies a logical process to identify and describe the activity components that may present sources of impact and/or risk to the environment and provides more detail on activity components with the greatest potential to generate impacts and risks to the environment, particularly the equipment that will be used to generate and measure acoustic signals during seismic acquisition. In this regard, the Environment Plan comprehensively describes the numbers and types of equipment and property that will be brought into the title areas and used to undertake the activity.
38. I also considered that the Environment Plan contained a thorough description of the environment that may be affected by the activity, including:
 - a. matters protected under Part 3 of the EPBC Act. In particular, the Environment Plan applies a logical process to identify and describe the matters protected under Part 3 of the EPBC Act that overlap with the areas that may be affected by impacts and risks from the planned and/or unplanned aspects of the activity. The Environment Plan has utilised relevant information to adequately inform and support the descriptions, such as information available on DCCEEW's website including plans of management, threat abatement plans, threatened species recovery plans and marine bioregional plans;

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- b. key physical, biological, social, economic, and cultural features, values and sensitivities of the environment of the Commonwealth marine area that overlap with the areas that may be affected by impacts and risks from the planned and/or unplanned aspects of the activity. The Environment Plan has utilised relevant references and information sources, such as contemporary peer reviewed scientific literature and other authoritative sources, to inform and support the descriptions.
- c. First Nations cultural features and heritage values of the EMBA. In particular:
 - i. the description in the Environment Plan includes consideration of both tangible and intangible aspects and is supported by multiple sources of relevant and suitable information. For example, cultural values related information published in State and Commonwealth Marine Park Management Plans, information on the cultural features of marine ecosystems including the broader concept of “sea country”, and information on Indigenous archaeology in the offshore marine environment. The Environment Plan also provided opportunities through relevant persons consultation with traditional custodians to inform the description of the potential for First Nations cultural heritage values within the EMBA.
 - ii. during the assessment process, an expert report was obtained from Extent Heritage to assist NOPSEMA to determine whether the Environment Plan included a thorough description of First Nations cultural features and heritage values of the environment. Extent Heritage concluded that the location of the activity will occur in waters that are well beyond the inundated coastal plain First Nations people occupied during the Pleistocene and is likely to be beyond the view lines and extent that First Nations watercraft were likely to have travelled. According to the report, this indicates that there is no potential for any in-situ First Nations submerged terrestrial archaeological deposits within the Operational Area. The conclusions in the report are consistent with information presented in the Environment Plan that does not identify any known First Nations archaeological sites in the activity’s Operational Area or EMBA which are located in Commonwealth waters;
 - iii. I also considered advice in the Extent Heritage report that the cultural heritage features and values may be considered as including physical, environmental and topographic features that have social, cultural, historical or spiritual values to First Nations people. This could include traditional resources of the sea and marine species that may have totemic or other values to First Nations people, cultural connections of First Nations people and marine life potentially impacted by the seismic survey illustrated in the rock art at Murujuga, which includes representations of marine creatures including marine turtles and whales.
 - iv. In relation to potential cultural connections to whale species, I considered information on whale occurrence and areas of biological importance documented in the EP including that the humpback whale migration BIA is 138 km south-east of the Operational Area and that the potential presence of other migratory cetacean species including the fin, sei and killer whale within or adjacent to the Operational Area during the acquisition of the survey is likely to be limited to individuals or small groups.
 - v. In relation to potential cultural connections to turtle species, I considered that there are no BIAs or Habitat Critical to the survival of marine turtles within the Operational Area.

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The nearest BIAs and HCTS for flatback turtles, located approximately 135 km southeast and 147 km south-east of the Operational Area, respectively.

- vi. the description in the Environment Plan is supplemented with results from an ethnographic heritage assessment undertaken for the Scarborough project development footprint which identified no ethnographic sites or values within the EMBA. I recognised that there is some uncertainty about the suitability of this ethnographic survey to provide a comprehensive understanding of ethnographic sites and values in the EMBA, including those intangible values associated with stories, dreaming, mythology, song or other cultural practice. This uncertainty exists given that the ethnographic study was undertaken by a limited group of traditional custodian representatives (i.e. Murujuga Aboriginal Corporation Circle of Elders) and for another purpose (i.e. the EP describes that the survey purpose as providing understanding of the cultural values within the coastal, nearshore and offshore proposed Scarborough trunkline and associated works areas). However, I note that the conditions imposed in [132] will afford further opportunity for any cultural features or heritage values (including intangible values) that may be affected by the activity to be identified, described and managed to ALARP and acceptable levels;
 - d. the Environment Plan includes sufficient information on legislative requirements that are relevant to the activity, and a demonstration of how they will be met. Notably, the Environment Plan includes an outline of the legislative requirements that are relevant to the activity and explains how they will be complied with throughout the life of the Environment Plan as part of the process that the Environment Plan applies for evaluating whether environmental impacts and risks of the activity will be of an acceptable level.
39. I also noted that the impact and risk assessment presented in the Environment Plan is commensurate to the magnitude of impacts and risks, and the level of analysis and evaluation is appropriate for the nature and scale of the activity and the severity of individual impacts and risks. For example:
- a. the Environment Plan has identified and evaluated all environmental impacts and risks that may arise from the activity, whether arising directly or indirectly, and including those arising from potential emergency conditions whether resulting from an accident or any other reason;
 - b. evaluations of impacts and risks provided in the Environment Plan are specific for the nature and location of the activity and the environment receptors that may be affected; and
 - c. the Environment Plan applies more detail and rigour to the impact and risk assessments where there is a higher degree of scientific uncertainty in predictions of impacts and risks and/or severity of potential consequence of impacts and risks. The Environment Plan provides details of the additional studies that were undertaken by the titleholders to adequately support and inform those impact and risk evaluations, including underwater sound modelling and oil spill trajectory modelling.
40. I considered that there is a clear demonstration in the Environment Plan that the evaluation of impacts and risks informed the selection of suitable control measures appropriate for the nature and scale of the activity to either reduce the consequence/severity or likelihood of environmental impacts and risks.
41. In light of the above, I am reasonably satisfied that the Environment Plan is appropriate for the nature and scale of the activity.

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Regulation 10A(b) - The Environment Plan demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable

42. Having regard to the Environment Plan, and subject to what I say below (at [46]) about threatened and migratory whales:
- a. I noted that the Environment Plan applied a clear, systematic, defensible, and reproducible process for demonstrating how environmental impacts and risks will be reduced to as low as reasonably practicable. In particular, the process involves analysing the effectiveness of a range of control measures that will either reduce the consequence/severity or likelihood of impacts and risks and setting out reasoned conclusions for whether a control measure is adopted based on environmental benefit versus cost of implementing that control measure;
 - b. I considered that all reasonable control measures have been considered and evaluated by the titleholders, including control measures reflecting good industry practice. For higher order impacts and risks, I accepted that the exploration of alternative, additional, or improved control measures by the titleholders had been evidenced;
 - c. I found that the evaluation of impacts and risks informed the selection of suitable control measures and that Environment Plan included sufficient detail of the control measures, particularly when read in conjunction with EPSs, to understand how control measures are intended to perform and to demonstrate that they will be effective in reducing impacts and/or risks to as low as possible for the duration of the Environment Plan; and
 - d. I am satisfied that the Environment Plan provides well-reasoned and supported arguments as to how the adopted control measures will reduce the potential impacts and/or risks to the point that any additional or alternative control measures either are not feasible, fail to lower impacts and/or risks any further or are grossly disproportionate in cost/sacrifice compared to the environmental benefit gained based on the residual consequence of the impact or risk.
43. However, I had some concerns that the Environment Plan did not demonstrate that the environmental impacts and risks of the activity to threatened and migratory whales will be reduced to as low as reasonably practicable. In this regard, I accepted that the evaluation of adoption of control measures relevant to threatened and migratory whales is based on environmental benefit and is systematic, defensible, and reproducible (section 6.6.2).
44. The Environment Plan, I am satisfied, adequately identifies and evaluates the potential impacts and risks from the activity to pygmy blue whales, humpback whales and deep diving species such as sperm and beaked whales, by being informed by the likelihood of species presence, distribution and behaviour within the area that may be affected by underwater noise emissions and supported with peer-reviewed literature and underwater noise propagation modelling. In particular, I noted that;
- a. the evaluation of impacts and risks to threatened and migratory whales were informed by applying suitable control measures including those set out within EPBC Act *Policy Statement 2.1 - Interaction between offshore seismic exploration and whales (Policy Statement 2.1)*, the control measures applied are proportionate to the fact that whales are not expected to be encountered in high numbers noting the Operational Area and EMBA is 16 km away from any BIA;
 - b. the predicted movement patterns and speed of whales in the migration BIA (as applied in the acoustic modelling) were used to support an assessment that auditory injury from the survey is unlikely due to lower noise exposure durations and an associated reduction in the TTS effect

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range meaning that the effect range was outside of the known pygmy blue whale migration corridor (Koessler et al. 2021);

- c. the Environment Plan also considered research on blue whale distribution patterns published in peer-reviewed literature during the period of the assessment (Thums et al. 2022) that indicated increased possibility of blue whale presence in and around the Operational Area than previously predicted by the NCVA and Conservation Management Plan for the Blue Whale. In light of this information, an additional control measure (being the inclusion of an additional whale detection platform in the form of a spotter vessel resourced with two trained and experienced marine fauna observers (**MFOs**) travelling 5 km ahead of the seismic survey vessel) was adopted so that whale detection is enhanced during the survey to a distance beyond which behavioural disturbance thresholds are reached, and shutdowns can be implemented to protect blue whales; and
 - d. the Environment Plan includes a commitment (C4.3 and PS4.3.1) that passive acoustic monitoring (**PAM**) observations will be undertaken on a 24-hour basis by two trained and experienced PAM operators and the PAM will be used to trigger shutdowns for any sperm and beaked whales detected in the 2 km shutdown zone during daylight and night/low visibility periods as well as being used to validate MFO observations and distances.
45. I agreed that the Environment Plan considered, evaluated, and detailed all reasonable control measures that could reduce impacts to threatened and migratory whales to as low as reasonably practicable. I considered that the Environment Plan provided supported reasons why the adopted controls for threatened and migratory whales reduce the potential impacts to the point that any additional or alternative control measures are either not feasible, or their cost would be grossly disproportionate to the benefit. Control measures adopted include:
- a. additional control measures for those species for which there is a higher potential for impacts, such as pygmy blue, sperm, and beaked whales;
 - b. Policy Statement 2.1 Part A measures will be implemented for all whale species including humpback whales, as well as some Part B measures in accordance with an increased likelihood of encounter with whales considering that the survey occurs in the distribution range of pygmy blue whales;
 - c. use of experienced MFOs and PAM operators on the vessel to detect whales and initiate shutdowns, including the use of PAM on a 24-hour basis to detect odontocete whales and a shutdown requirement applies if any sperm or beaked whale is detected within 2 km as is required by Policy Statement 2.1;
 - d. an increased observation zone that extending across the observable distance and immediate shut down to apply to any pygmy blue whales and other large unidentified whales sighted as a precautionary measure;
 - e. use of an additional spotter vessel to travel 5 km ahead of the seismic vessel at all times of the year to observe for whales and initiate shutdowns within the limits of visibility for any possible blue whale effectively reducing the potential for behavioural disturbance of blue whales to as low as reasonably practicable; and
 - f. adaptive mitigation measures to ensure that impacts and risks would continue to be managed to as low as reasonably practicable. Specifically, if there are three or more shutdowns over a 24-hour period for pygmy blue whales then seismic operations will cease during low visibility or at

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night-time and cannot resume at night-time until there has been a cumulative 24-hour period during which there has been less than three sightings/shutdowns.

46. I noted that analysis of impacts to threatened and migratory whales has been incorporated into the EP in Table 5.4 and section 6.6.2 and includes consideration of objections and claims raised in relation to the management of impacts to whales to reduce these to as low as reasonably practicable. Despite the above, I noted that there was some inconsistency in the way the Environment Plan describes the use of a spotter vessel with two additional trained and experienced MFOs. In some parts of the Environment Plan, this measure will only be applied during the peak northbound migration months for blue whales (May and June) and in other parts the measure is described as being applied for the full duration of the seismic survey.
47. Noting this inconsistency, NOPSEMA wrote to the titleholders proposing that a condition be imposed requiring that 2 additional trained and experienced MFOs be present for the full duration of the seismic survey. The titleholders responded and did not raise any comments or concerns about this proposed condition.
48. Noting the inconsistency in the Environment Plan, I am not reasonably satisfied that the Environment Plan met reg 10A(b) because I believed that the inconsistency meant that the Environment Plan was unable to demonstrate that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable. However, if the spotter vessel with 2 MFOs was, in fact, present for the full duration of the seismic survey I considered that the Environment Plan could be accepted. Therefore, I considered it would be appropriate to impose a condition in relation to such (see [133] below).

Regulation 10A(c) - The Environment Plan demonstrates that the environmental impacts and risks of the activity will be of an acceptable level

49. Reg 10A(c) required that I be reasonably satisfied that the environmental impacts and risks of the activity will be of an acceptable level.
50. I found that that the Environment Plan applies a clear, systematic, defensible, and reproducible process for demonstrating how environmental impacts and risks will be of an acceptable level. The process involves evaluating impacts and risks in the context of how they comply or align with relevant internal and external policy settings, stakeholder feedback received by the titleholders during relevant persons consultation and relevant legislative requirements. This includes but is not limited to applicable plans of management, recovery plans, conservation advice and other guidance for matters protected under the EPBC Act, and the principles of ecologically sustainable development as defined under the EPBC Act.
51. I considered that the Environment Plan:
 - a. and the process that it applies for demonstrating that impacts and risks will be of an acceptable level is commensurate with the nature and scale of the activity and the severity of its impacts and risks. For example, the Environment Plan demonstrates that the process has driven the titleholders to apply more effort and rigour to evaluations where there is a higher degree of scientific uncertainty in predictions of impacts and risks and/or severity of potential consequence of impacts and risks;
 - b. includes appropriate and accurate content to demonstrate that the proposed activity is not inconsistent with a recovery plan or a threat abatement plan for a listed threatened species or ecological community;

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- c. areas of uncertainty in predictions of impact and risk are identified, acknowledged, and addressed. For example, the process that the Environment Plan applies for demonstrating how environmental impacts and risks will be of an acceptable level considers the uncertainty in the level of harm associated with individual impacts and risks and adopts a precautionary approach (e.g. conservative 'worst-case' approach) for those impacts and risks involving greater uncertainty;
 - d. the Environment Plan provides reasoned conclusions that impacts and risks will be acceptable or managed to acceptable levels with the implementation of suitable control measures to either reduce the consequence/severity or likelihood of environmental impacts and risks (see [24] above for examples). In particular, the Environment Plan has regard for relevant scientific papers, recovery plans for listed threatened species and good practice guidance for the management of impacts and risks when making the case that impacts and risks will be managed to acceptable levels; and
 - e. the Environment Plan evaluates environmental impacts and risks associated with the activity, including but not limited to atmospheric emissions (including greenhouse gases) and light emissions generated by the activity, and the potential for the introduction of invasive marine species (IMS). With the implementation of monitoring and adopted control measures that consider relevant guidelines/requirements, such as Marine Order 97 – Marine Pollution Prevention – Air Pollution, the National Light Pollution Guidelines for Wildlife, and the Australian Ballast Water Management Requirements, I am reasonably satisfied that the environmental impacts and risks of the activity will be managed to an acceptable level.
52. I am reasonably satisfied that each of the above as addressed in the Environment Plan demonstrated that the environmental impacts and risks of the activity will be of an acceptable level.
53. I found above (at [45]) that the Environment Plan considered, evaluated, and detailed all reasonable control measures that could reduce impacts to threatened and migratory whales to as low as reasonably practicable. I noted that the Environment Plan defines acceptable levels of impact for threatened and migratory whale species in Section 6.6.2 of the EP taking into consideration the titleholders' acceptability criteria that includes the Principles of ESD, the titleholders' corporate environmental policies, consultation feedback and legislative requirements under the EPBC Act. This was incorporated into the EPO that requires the titleholders to "Undertake seismic acquisition in a manner that prevents injury to whales and minimises the potential for biologically significant behavioural disturbance."
54. I found that the Environment Plan adequately addressed the potential for the activity to directly or indirectly affect marine turtles, whales and other marine fauna, including species that may be of cultural significance to First Nations people. In particular, I considered the potential for underwater noise to disrupt migration, seasonal movement patterns and vocalisation/communication. In considering this, I took into account the following:
- a. Marine mammals and especially cetaceans rely on sound for important life functions including individual recognition, socialising, detecting predators and prey, navigation and reproduction and underwater noise can affect marine mammals in various ways including interfering with communication (masking), behavioural changes, a shift in the hearing threshold, physical damage and stress.
 - b. There are no marine turtle or whale BIAs or habitats critical to survival in the areas that may be affected by the MSS underwater noise emissions above behavioural disturbance thresholds for these species.

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- c. Given the location, duration and timing of the activity and with control measures in place to mitigate underwater noise [45], impacts to cetaceans and marine turtles are likely to be restricted to temporary behavioural changes in individuals moving through the Operational Area and impacts to species recovery or population viability are unlikely to be realised.
 - d. During the 11A consultation process First Nations relevant persons did not identify cultural connections to particular species and the conditions [132] provide an opportunity for such information to be provided and inform the management of the activity.
55. For the reasons given at [45] above, and as follows, I accepted that the Environment Plan demonstrated that the environmental impacts and risks of the activity to the threatened and migratory whales will be of an acceptable level because:
- a. the Environment Plan is not inconsistent with Commonwealth of Australia, Conservation Management Plan for the Blue Whale 2015–2025 including Guidance on Key Terms within the Blue Whale Conservation Management Plan (2021) and Blue Whale Conservation Management Plan – FAQs published by NOPSEMA, Department of Sustainability, Environment, Water, Population and Communities, Marine Bioregional Plan for the North-west Marine Region, Department of the Environment, Water, Heritage and the Arts, EPBC Act Policy Statement 2.1 – Interaction between offshore seismic exploration and whales: Industry Guidelines (September 2008). I considered that the Environment Plan contained all Part A management measures as described in Policy Statement 2.1, as well as adoption of additional Part B measures, which reflected a precautionary approach by the titleholders to the risks and impacts of the activity;
 - b. the acceptable level of impact for underwater noise impacts on whales is compared to the predicted level of impact, which is derived from comparing noise modelling studies with published studies on the distribution and abundance patterns of whales to demonstrate that the environmental impacts of the activity will be managed to an acceptable level;
 - c. areas of uncertainty in predictions are addressed by the control measures, including a commitment to cease acoustic emissions immediately if a blue whale (or possible blue whale is) is detected within observable distances (these distances are extended beyond the distance at which noise can exceed thresholds known to cause behavioural disturbances). This will be achieved through use of an additional support vessel with two trained and experienced MFOs on board at all times during the survey for possible pygmy blue whales and in accordance with Policy Statement 2.1 for other whales;
 - d. the method applied to demonstrate that the environmental impacts and risks of the activity from acoustic emissions to threatened and migratory whales is based on a description of whale distribution, abundance and behaviour in the ensonified area, contemporary science on effects of noise on whales, source and location specific acoustic modelling, Policy Statement 2.1 control measures as well as consideration of other commonly used and known control measures for whale detection and mitigation and so is systematic, defensible, and reproducible;
 - e. the Environment Plan considers the potential for permanent and temporary threshold shifts in hearing, behavioural disturbance, and masking due to underwater noise exposure and any subsequent potential impact to individual fitness and population viability. The titleholders' evaluation for this topic is more detailed than for other environment receptors and so is commensurate to the predicted magnitude of impacts and risks to listed threatened and migratory whale species that may be encountered in the Operational Area;

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- f. the Environment Plan provides an evaluation of the potential impacts to planktonic food sources and potential foraging activity of pygmy blue whales within their distribution range. The activity is unlikely to have an unacceptable level of impact on whale foraging because the Operational Area is not located in a designated pygmy blue whale foraging area (Blue Whale Conservation Management Plan and Thums et al. 2022). Therefore, based on the low likelihood of foraging occurring in the area, the adoption of additional controls in the event whales are sighted, including increased observation and shutdown zones, and precautionary adaptive mitigation where greater than predicted numbers of pygmy blue or unidentified whales are detected, there is limited potential for impacts to biologically important behaviours of pygmy blue whales. Precautionary measures are in place to manage any potential impacts to an acceptable level;
 - g. the Environment Plan addresses impacts and risks from underwater noise to baleen and odontocete whales, including both mid-high frequency cetaceans and low frequency cetaceans. It details the modelling which predicts that Permanent Threshold Shift (**PT**) and Temporary Threshold Shifts (**TTS**) will not be exceeded, or the range to exceedance will be limited to the immediate proximity of the seismic source therefore indicating that shutdown zones of 2km will be effective in mitigating auditory injury. Further, the Environment Plan specifies detection and mitigation measures including pre-start surveys, extended shutdown zones for the seismic source, the use of qualified and experienced MFOs and passive acoustic monitoring operators to improve the efficacy of visual observations to inform management responses, use of a spotter vessel to extend the observation distance for whales to greater than the distance for predicted behavioural disturbance as well as night time and low visibility procedures; and
 - h. responses received by relevant persons consultation in relation impacts to threatened and migratory whales have been incorporated into the Environment Plan (Table 5.4 and section 6.6.2) or considered by the assessment team. I am reasonably satisfied that the titleholders had considered and addressed these responses, which included objections and claims related to the impact assessment of zooplankton as a source of food for pygmy blue whales, noise impacts on whales including hearing injury, behavioural disturbance and masking, concerns about the accuracy of the underwater acoustic modelling and access to supporting literature used in the evaluation, and that the Environment Plan demonstrates that the environmental impacts and risks of the activity to the threatened and migratory whales will be of an acceptable level.
56. I noted that the Environment Plan predicts, based upon scientifically supported predictions and the location of the activity outside of the BIA, that the likelihood of encountering pygmy blue whales in the area within which received noise levels may elicit TTS, PTS, behavioural disturbance, or masking is low but possible. Nevertheless, the Environment Plan:
- a. explains that PTS will be prevented by the seismic source being shut down well in advance of any whale approaching the PTS effect range;
 - b. predicts that it is unlikely that TTS or masking will occur due to; the conservative shut down protocols; routine and non-routine breaks in noise generation due to turns and other logistics requirements; results of the noise modelling combined with the movement of the seismic vessel and the predicted movements and behaviour of whales if present (mostly migrating, not breeding or foraging), all of which will reduce noise exposure periods. If greater than expected numbers of whales are observed in the survey area, or behaviours observed are different than expected (i.e. not migrating, indicating foraging or other behaviours, which would indicate an increased risk of TTS or masking effects) it is expected that the titleholders will initiate and follow its change and revision processes (which I consider in reg 10A(e) below);

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- c. demonstrates that the potential impacts and risks of behavioural disturbance will be reduced to an acceptable level through the application of an immediate shutdown for all detections of pygmy blue whales or large unidentified whales. This shutdown measure will be supported by two trained MFOs who will maintain watch during all hours of daylight and good visibility conditions and two MFOs on an additional spotter vessel; and
 - d. includes triggers to cease night-time operations should higher than anticipated whale numbers be encountered in accordance with Policy Statement 2.1. This control measure will eliminate noise and associated impacts during periods when whales cannot be effectively detected.
57. I found that, through the adoption of the control measures described above (and at [45]), the Environment Plan demonstrated how the activity will be managed to ensure that environmental impacts and risks of the activity to the threatened and migratory whales will be of an acceptable level.
58. For the above reasons, I am reasonably satisfied that the requirements of reg 10A(c) are met.

Regulation 10A(d) - The Environment Plan provides for appropriate environmental performance outcomes, environmental performance standards and measurement criteria

59. Sections 2 and 6 of the Environment Plan contain the EPOs, EPSs and measurement criteria.
60. The Environment Plan provides 16 EPOs that I considered are:
- a. clear, unambiguous and address all environmental impacts and risks relevant to the activity (noting that one EPO may relate to multiple impacts and risks), including the combinations of all environment aspects and the cumulative impacts on all values and sensitivities that may be affected by the activity. For example, the Environment Plan contains discrete EPOs for impacts and risks to whales that address all identified impacts and risks and are directly linked to acceptable levels. I also note that the EPOs reflect the level of environmental performance set by recovery plans where relevant;
 - b. establish levels for environmental performance that are equivalent to or better than the predicted levels of environmental impact or risk that the Environment Plan has demonstrated are acceptable. For example, there is a discrete EPO for underwater noise that reflects the defined acceptable level of impact for pygmy blue whales which sets a level of performance for the management of the activity to ensure impacts do not impede the recovery of pygmy blue whales; and
 - c. reflect levels of environment performance for management that are achievable, consistent with the principles of ecologically sustainable development and are compliant with relevant legislative requirements and the *Program Report – Strategic Assessment of the Environment management authorisation process for petroleum and greenhouse gas storage activities administered by the National Offshore Petroleum Safety and Environment Management Authority under the Offshore Petroleum and Greenhouse Gas Storage Act 2006* (endorsed on 7 February 2014) (**Program**) requirements.
61. The Environment Plan includes EPSs that:
- a. are directly linked to control measures determined through impact and risk evaluations to be necessary to ensure environmental impacts and risks are reduced to as low as reasonably practicable and to an acceptable level. For example, the EPSs can be directly linked to control

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measures that are relevant to the management of impacts to whales and are supported by clear measurement criteria that can be easily monitored;

- b. contain clear and unambiguous statements of environmental performance. The statements of environmental performance established by the EPSs describe how each of the adopted control measures will function and perform to effectively reduce environmental impacts and risks to as low as reasonably practicable and to an acceptable level;
 - c. have clear measurement criteria defining how environmental performance will be measured for demonstrating that the defined levels of environmental performance are being met and impacts and risks are being reduced to as low as reasonably practicable and to an acceptable level. For example, log books demonstrating MFOs on duty during daylight hours and CVs demonstrating suitably competent passive acoustic monitoring operators.
62. I considered that the EPOs, EPSs and measurement criteria are all linked and complementary because they are consolidated in a table for each of the environmental aspects with EPSs and measurement criteria set out in relation to each EPO. Therefore, I accepted that they can easily be monitored for compliance, by both the titleholders and NOPSEMA, to ensure environmental impacts and risks are being reduced to as low as reasonably practicable and to an acceptable level.
63. For the above reasons, I am reasonably satisfied that the Environment Plan provides for appropriate EPOs, EPSs and measurement criteria, and reg 10A(d) was met.

Regulation 10A(e) - The Environment Plan includes an appropriate implementation strategy and monitoring, recording and reporting arrangements

64. I am satisfied that the Environment Plan included all of the details required by reg 14 (see [28]-[29] above). Reg 10A(e) required that I be reasonably satisfied that that strategy and the monitoring, recording and reporting arrangements were appropriate.
65. The implementation strategy in the Environment Plan includes processes and systems for environmental performance monitoring, auditing, management of non-conformance, review, record keeping and reporting (both internally and externally). When implemented together, I am satisfied that these processes and systems provide for all impacts and risks to be identified and reduced to as low as reasonably practicable and acceptable levels for the duration of the Environment Plan. I therefore considered that the Environment Plan describes adequate and effective processes and systems to ensure that all impacts and risks continue to be identified and reduced to as low as reasonably practicable and acceptable levels.
66. I noted that the EMS includes measures to ensure that control measures in the Environment Plan continue to be effective in reducing impacts and risks to as low as reasonably practicable and acceptable levels, and monitoring arrangements are in place to determine whether, and ensure that, EPOs and EPSs are being met. The effectiveness of the EMS would be tested through implementation of system components, including the processes outlined within the arrangements that will be in place to ensure environmental risks and impacts will continue to be reduced to as low as reasonably practicable and acceptable levels. I considered that these measures are appropriate as they include fundamental 'do', 'check' and 'act' components of an EMS post-planning phase.
67. I am satisfied that the implementation strategy includes appropriate management of knowledge and change processes that provide for the titleholders to undertake monitoring for, and understand change in, both internal and external context relevant to the activity, implement processes to consider change in the context of environmental impacts and risks and regulatory requirements, and to have accepted

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changes implemented. In this regard, the implementation strategy in the Environment Plan outlines circumstances where additional risk assessments will be undertaken on an ongoing basis, including when new relevant scientific information/papers become available.

68. I noted that arrangements were in place for monitoring, recording, audit, management of non-conformance and review of the titleholders' environmental performance. For example, system components for monitoring and recording of information relevant to the activity are outlined, including routine reporting and notifications. The Environment Plan also provides for auditing and inspection of performance, including non-compliant incident investigation and tracking of close-out actions and arrangements are in place to allow monitoring of, and maintaining a quantitative record of, emissions and discharges (whether occurring during normal operations or otherwise). I considered that these records can be used to assess whether the EPOs and EPSs in the Environment Plan are being met, and accepted that all of the arrangements were appropriate in the context of the nature and scale of the activity.
69. I also considered that the following aspects of the Environment Plan were notable:
- a. the Environment Plan describes the titleholders' organisational structure for the activity and sets out roles and responsibilities of key personnel in a structured manner. The titleholders' emergency management structure is also detailed in the OPEP; and
 - b. the Environment Plan outlines measures for ensuring employee and contractor training and competency to ensure that these persons can fulfil their duties and maintain awareness of their responsibilities. In this regard, the Environment Plan identifies management system components that include contractor evaluation and management, employee training and competency development, and activity-specific induction of personnel as key measures.
70. These two matters demonstrated that appropriate arrangements were made for reporting and that appropriate measures were in place to ensure that those involved in the activity would be aware of what was expected of them.
71. I considered that the OPEP was appropriate for the nature and scale of the activity, and that there were sufficient measures in place to respond to, and monitor, oil pollution in the event of an unplanned hydrocarbon spill. For example, development of a first strike plan that includes a suite of oil pollution monitoring techniques as well as oiled wildlife response arrangements. The OPEP also had in place the arrangements and capability:
- a. for the duration of the activity, to ensure timely implementation of the control measures, including arrangements for ongoing maintenance of response capability;
 - b. for monitoring the effectiveness of the control measures and ensuring that the EPSs for the control measures are met;
 - c. for monitoring oil pollution to inform response activities;
 - d. to undertake appropriate monitoring of impacts to the environment from oil pollution and response activities in consultation with the control agency; and
 - e. for testing of the response arrangements in the OPEP that reflect requirements of the regulations and are considered commensurate with the risk, including commitments to test spill response arrangements prior to commencing the activity.

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72. The process for ongoing consultation described in the Environment Plan demonstrates that the titleholders will consult with relevant interested persons or organisations, and continue to consult with relevant persons, throughout the life of the Environment Plan as appropriate. For example, any significant changes to the activity will be communicated to relevant persons and in the event of an incident, such as an unplanned hydrocarbon spill, the titleholders will ensure stakeholders that may be affected are identified and engaged. The titleholders will continue to accept feedback from relevant interested persons or organisations, including relevant persons, during the life of the Environment Plan, and assess the feedback for merit. Any relevant new information will be assessed using the Environment Plan management of knowledge and change processes to ensure impacts and risks continue to be identified and managed to as low as reasonably practicable and acceptable levels.
73. Although these high-level commitments for ongoing consultation are appropriate, they are not sufficiently detailed to demonstrate that the issues identified at [94 - 97] for First Nations relevant persons will be addressed through the ongoing consultation arrangements as set out in Section 7.9.2.1 of the Environment Plan.
74. Taking into account all of the matters identified at [64]-[73], I am reasonably satisfied that the requirements of reg 10A(e) were met.

Regulation 10A(f) - The Environment Plan does not involve the activity or part of the activity, other than arrangements for environmental monitoring or for responding to an emergency, being undertaken in any part of a declared World Heritage property within the meaning of the EPBC Act

75. As I stated above (at [19.c]), the PMST evidenced that that neither the activity, nor any part of it, will be undertaken in any part of a declared World Heritage Property within the meaning of the EPBC Act. The Environment Plan notes that the closest World Heritage Property to the activity is the Ningaloo Coast World Heritage Property, located approximately 168 km south-south-east from the Operational Area. More significantly, the Ningaloo Coast World Heritage Property is located outside of the EMBA, which represents the largest spatial extent where unplanned events could have an environmental consequence on the surrounding environment.
76. In circumstances where the activity is not being undertaken in, and could not have any environmental impact upon, a World Heritage Property, I am reasonably satisfied that reg 10A(f) was met.

Regulation 10A(g) - The Environment Plan demonstrates that the titleholders has carried out the consultations required by Division 2.2A and the measures (if any) that the titleholders has adopted, or proposes to adopt, because of the consultations are appropriate

77. Reg 10A(g) has two components which the Environment Plan must demonstrate:
 - a. first, that consultation has occurred as per the requirements in Division 2.2A of the Regulations. Division 2.2A requires that the titleholders consults with each 'relevant person' as defined in reg 11A(1), and imposes certain requirements for how that consultation is to occur (as specified in reg 11A(2)-(4));
 - b. second, that the titleholders adopted, or proposed to adopt, appropriate measures in light of those consultations.
78. NOPSEMA received a number of communications from relevant persons raising issues and/or expressing concerns with and objections to the Environment Plan. Those communications raised the

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same issues, concerns and objections as were raised during the consultation with the titleholders required by reg 11A, and are addressed in my reasons below regarding whether reg 10A(g) is met.

Relevant Persons under Regulation 11A(1)(a)-(c)

79. Relevant persons under reg 11A(1)(a)-(c) are each Commonwealth, State or Northern Territory Department or agency to whom the activity in the Environment Plan may be relevant, in addition to the Department of each responsible State Minister or Northern Territory Minister.
80. Table 5-3 of the Environment Plan identified Commonwealth and State Departments and agencies in the marine, environment and industry fields, and Section 5.7.1 provided further detail of the identification process, which I considered to be appropriate. The titleholders then made an assessment whether the activities to be carried out under the Environment Plan may be relevant to Commonwealth and State bodies. Of the 18 Commonwealth and State bodies identified, 15 were assessed as being 'relevant persons.' Reasons were provided why the 3 remaining bodies were not considered relevant persons. For example, the Ningaloo Coast World Heritage Advisory Committee was not considered a relevant person because the Operational Area and EMBA would not impact upon the area for which the Committee has responsibility. I agreed with and accepted the reasoning provided by the titleholders as to why these bodies were not consulted, namely, because the activity did not have the potential to impact the respective bodies' functions.
81. I noted that consultation with the relevant persons under reg 11A(1)(a)-(c) occurred, in accordance with GL1887 – Consultation with Commonwealth agencies with responsibilities in the marine area – January 2023, via email unless otherwise requested. Emails were sent to the relevant bodies on 13 May 2021, requesting responses by 14 June 2021. Emails were sent (with updated information) on 27 January 2023, requesting responses by 26 February 2023. Reminder emails were sent by the titleholders as this date approached.
82. I considered that sufficient information was provided to allow the relevant persons under reg 11A(1)(a)-(c) to make an informed assessment of the possible consequences of the activity on the functions, interests or activities of the relevant person. In particular, I noted that, in many of the cover emails for respective bodies, the titleholders provided a table of further information specific to the functions, interests or activities of the relevant person. For example, specific details of "Implications for Parks Australia interests" was sent to the Director of National Parks. Specific details of "Potential risks to commercial fishing and proposed mitigation measures" was sent to AMFA, and various other examples contained in the Environment Plan.
83. Finally, the consultation emails sent to each relevant person contained the following statement:

Please let us know if your feedback for this activity is sensitive and we will make this known to NOPSEMA upon submission of the Environment Plan in order for this information to remain confidential to NOPSEMA
84. In light of the matters at [799]-[83], I am reasonably satisfied that consultations with relevant persons, as defined by reg 11A(1)(a)-(c) was completed as required by Part 2-2A (and therefore reg 10A(g)(i) was met).
85. I noted that most relevant persons under reg 11A(1)(a)-(c) provided no feedback or objections to the activity in response to the consultation requests. Where a response was received, it was in the nature of feedback, as opposed to objections against the activity. Where feedback was received, the Environment Plan has identified this and indicated what changes were made to the Environment Plan in response. For example, a large part of the feedback was that certain bodies should be notified of

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things or provided documents when they occur or become available. The Environment Plan contains the details of this reporting or commits to providing these documents. I considered that these measures were appropriate, and therefore reg 10A(g)(ii) was met.

86. Considering the matters above, I am reasonably satisfied that, in relation to relevant persons as defined by reg 11A(1)(a)-(c), the Environment Plan demonstrates that the titleholders has carried out the consultations required by Division 2.2A and the measures (if any) that the titleholders has adopted, or proposes to adopt, because of the consultations are appropriate, as required by reg 10A(g).

Relevant Persons under Regulation 11A(1)(d)

87. Relevant persons under reg 11A(1)(d) are considered to be 'a person or organisation whose functions, interests or activities may be affected by the activities to be carried out under the environment plan, or the revision of the environment plan.'
88. I considered that the Environment Plan provided clear details of the processes that have been applied to identifying and determining who are relevant persons, as well as the processes undertaken for consulting with them. In particular, the Environment Plan correctly states that the terms "functions", "interests" and "activities" for the purpose of identifying relevant persons under reg 11A(1)(d) is to be interpreted and applied broadly by the titleholders in a manner consistent with the objects of the Regulations and the EPBC Act. The Environment Plan also utilised NOPSEMA's 'Consultation in the course of preparing an environment plan guideline' (N-04750-GL2086) (**NOPSEMA's Consultation guideline**) in defining the terms.
89. The Environment Plan identified and considered the following broad categories within the scope of reg 11A(1)(d):
- a. commercial fisheries (Commonwealth and State) and peak representative bodies;
 - b. recreational marine users and peak representative bodies;
 - c. titleholders and operators;
 - d. peak industry representative bodies;
 - e. Traditional Custodians and nominated representative corporations;
 - f. Native Title Representative Bodies (NTRBs);
 - g. historical heritage groups or organisations;
 - h. local government and recognised local community reference/liaison groups or organisations;
 - i. other non-government groups or organisations; and
 - j. research institutes and local conservation groups or organisations.
90. I will first explain my conclusions on Traditional Custodians, nominated representative corporations and NTRBs, and then my conclusions on the other 8 'relevant persons' categories identified at [899].

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Traditional Custodians and nominated representative corporations and NTRBs

91. I considered that the titleholders' process for relevant persons identification has provided for the broad capture of First Nations representative groups such as NTRBs and Prescribed Body Corporates (PBCs) by identifying and consulting with all relevant groups along the full extent of the coastline adjacent to the EMBA as relevant persons.
92. The First Nations people/groups that have been identified as relevant persons in the Environment Plan includes one NTRB, eight First Nations nominated representative corporations and one other First Nations group that made themselves known to the titleholders and self-identified as a relevant person.
93. I accepted that the Environment Plan demonstrated the following matters:
 - a. I considered that the titleholders has provided these relevant persons with sufficient information in a readily accessible form and appropriate format to allow them to make an informed assessment of the possible consequences of the proposed activity on their functions, interests, or activities. For example, the titleholders provided the PBCs with a simplified consultation information sheet to share with their individual members that provided details on the environmental impacts and risks associated with the proposed activity with the location and extent of the EMBA clearly depicted. The titleholders also used clear, simple, and directly expressed terms during the consultation to make it clear to the PBCs that the invitation to participate in consultation provides an opportunity to inform the titleholders of the nature of cultural interests that the PBC or their members may have within the EMBA;
 - b. additional information was provided iteratively and consultation was adapted in response to the feedback received from relevant persons to allow them to make an informed assessment of the possible consequences of the proposed activity on their functions, interests, or activities. For example, when a PBC expressed interest in engaging in the consultation process and provided feedback on their preferred method for the consultation, the titleholders accepted that feedback and adapted their approach to engaging with the PBC and their members based on their preferred method which typically resulted in the provision of additional verbal briefings and/or presentations supported with information in pictorial or graphic form;
 - c. where requested, the titleholders adapted their approach to consultation in an appropriate manner to accommodate the provision of culturally restricted or sensitive information from relevant persons;
 - d. the titleholders provided these relevant persons with a reasonable period to consider information and provide feedback on how their functions, interests or activities may be affected by the activity. For example, relevant persons consultation with the PBCs commenced in January 2023, approximately 4.5 months prior to the submission of the Environment Plan and there has been an iterative process of information provision and various opportunities to provide feedback in writing or verbally at meetings; and
 - e. there is evidence in the consultation records that the titleholders has advised First Nations groups that they may request that particular information they provide is not published and it is evident that these requests have been addressed.
94. Despite the consultation with First Nations relevant persons outlined above, I remained concerned that the titleholders had not carried out all consultation required by Division 2.2A. I considered that there was uncertainty in the Environment Plan as to whether all First Nations persons who may have cultural interests that may be affected by the activities have been identified, whether a reasonable

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period has been afforded to consult with them on the consequences of the activity, and whether appropriate measures have been adopted as a result of the consultation. In this regard, I considered the following matters:

- a. the titleholders' process for identifying First Nations people/groups that may have functions, interests or activities affected by the proposed activity places a heavy reliance on directing consultation through NTRBs and PBCs that may not represent all traditional custodians. However, there is uncertainty as to whether all traditional custodians are represented by the identified representative bodies and the NOPSEMA's Consultation guideline describes that a connection of traditional owners with sea country may constitute an interest for the purposes of reg 11A(1)(d);
 - b. the consultation process outlined in the Environment Plan states that "*Woodside asks nominated representative bodies and the NTRBs to identify individuals*". However, consultation records with the NTRBs and nominated representative corporations that were consulted by the titleholders do not demonstrate that they were appropriately asked in all cases to support the identification of other traditional custodian individuals or groups known to hold cultural interests that intersect with the Operational Area or EMBA;
 - c. the Environment Plan also states that the consultation process "*enables individuals to self-identify in response to national and local advertising, social media and community engagement opportunities*". It is noted that these advertisements were developed in consultation with indigenous representatives. However, despite this, these advertisements do not describe the opportunity for consultation in clear, simple and directly expressed terms so that individuals were sufficiently informed as to the opportunity being afforded to them, i.e. consultation on petroleum activities, the associated environmental impacts and risks and the potential for consequences to their functions, interests and activities. For example, the titleholders obligations for relevant persons consultation are not clearly explained and some of the information presented suggests it is an opportunity to participate in a passive feedback process rather than an iterative consultation process;
 - d. the titleholders' consultation process includes some limiting steps that may prevent the titleholders from identifying and consulting with First Nations relevant persons even if they were to self-identify. In particular, the process describes that "*Woodside will consult with individual Traditional Custodians where we have been directed to do so by the representative institution or the native title representative body*" and "*Where Woodside receives feedback from a person or organisation that identifies as a Traditional Custodian for an area overlapping the EMBA, including via an advertisement, Woodside will assess the feedback provided including whether the person(s) functions, interests and activities are represented by virtue of their membership of a PBC, and determine relevance*". The Regulations and judicial guidance do not provide a basis for limiting the scope of relevant persons in this way.
 - e. consultation records indicate that representatives of Save our Songlines have requested a second meeting with the titleholders in order to further understand the proposed activity and to share information on their functions, interests or activities that may be affected by the proposed activity, and that this had not yet taken place before the Environment Plan was resubmitted. This indicated to me that, at least at the time the Environment Plan was resubmitted, further consultation was to occur.
95. I am aware that, since the Environment Plan was resubmitted, further consultation has occurred between the titleholders and Save our Songlines. Correspondence from the titleholders dated 3 July

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2023 was copied to NOPSEMA, and indicates that the titleholders considers that consultation with Save our Songlines has been completed under reg 11A, but that the titleholders is willing to continue discussions. NOPSEMA was copied into correspondence on 25 July 2023 that further confirms additional consultation has been undertaken with Save our Songlines. Noting that these matters took place after the Environment Plan was submitted, it has no bearing upon whether the Environment Plan demonstrates that the titleholders has carried out the consultations required by Division 2.2A. However, this information indicates that there is uncertainty as to whether there is additional information held by First Nations people on the cultural features of the environment, including spiritual and cultural connections to the environment that may be affected by the activity. The conditions set out at [133] require that additional consultation is undertaken with relevant First Nations people and groups so that information on cultural features and/or heritage values that may be impacted by the activity can be provided and control measures can be adopted/revised by the titleholders where necessary to manage any impacts and risks to as low and reasonably practicable and acceptable levels.

96. While I considered that the consultation undertaken by the titleholders was comprehensive, the concerns I have raised above meant that I am not reasonably satisfied that consultation as required by Division 2.2A had been carried out (and therefore I am not reasonably satisfied that reg 10A(g)(i) was met).
97. I also considered whether the Environment Plan demonstrates that the measures (if any) that the titleholders has adopted, or proposes to adopt, because of the consultations are appropriate. Given that I am not satisfied that consultation undertaken had met the requirements of Division 2.2A, I am not satisfied that reg 10A(g)(ii) was met.
98. However, as I noted above, the titleholders has nevertheless undertaken comprehensive consultation. Based upon the relevant sections of the Environment Plan, I considered that:
 - a. the titleholders has assessed the merits and provided responses to all objections and claims raised by relevant persons during the consultation thus far;
 - b. in circumstances where no responses from a relevant person were received by the titleholders, the Environment Plan provides that the titleholders made reasonable efforts to consult the relevant person to understand how their functions interests or activities may be affected. For example, consultation records in section 5 and the sensitive information part of the Environment Plan show that the titleholders attempted to contact these relevant persons on multiple occasions, using multiple methods (e.g. phone calls, emails and/or face to face meeting attempts) and over a reasonable timeframe (e.g. multiple months).
 - c. information that was gathered during the titleholders' consultation process with First Nations relevant persons thus far has been appropriately incorporated into the Environment Plan. For example, where Buurabalayji Thalanyji Aboriginal Corporation (**BTAC**) informed the titleholders of the Thalanyji people's cultural obligation to care for the environmental values of sea country and this information has been all incorporated into the description of the environment in the Environment Plan. The consultation records with BTAC demonstrate that the titleholders committed to continue engaging with BTAC regarding their environmental values of sea country, and that BTAC has agreed for the further engagement to be completed as part of ongoing consultation subject to formalising a 'collaborative agreement'. Additionally, the titleholders has developed the Cultural Heritage Management Plan with the Murujuga Aboriginal Corporation
99. To the extent that consultation has occurred and been undertaken, the Environment Plan largely demonstrated that the measures that the titleholders has adopted, or propose to adopt, because of the consultations are appropriate. My residual concerns are that the Environment Plan did not include

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a clear commitment to continuing to work with BTAC to finalise the proposed 'collaborative agreement' for the purposes of identifying, managing and protecting the Thalanyji people's values of sea country and to clarify what is important to, and shared understanding between, the titleholders and BTAC for a broader range of activities in Thalanyji country in the short, medium and longer terms, including but not limited to the proposed Scarborough activities in the EMBA. I am therefore not reasonably satisfied that all of the measures that the titleholders proposed to adopt were appropriate.

100. I am unable to be satisfied that reg 10A(g) was met in relation to consultation with Traditional Custodians, nominated representative corporations and NTRBs. However, for the reasons given above, I accepted that consultation that had been undertaken was comprehensive and had been assessed and implemented where relevant. Accordingly, I considered that it would be appropriate to approve the Environment Plan subject to conditions addressing the concerns that I have raised above. I discuss these conditions in further detail below [133].

Other 'relevant persons'

101. The Environment Plan clearly identifies who has been identified as a relevant person, includes details of the rationale the titleholders has used to determine who they consider fall within that definition and broadly describes the functions, interests or activities of those persons or organisations identified as relevant persons under reg 11A(1)(d). The Environment Plan includes reference to multiple sources of information used by the titleholders to assist in the identification of relevant persons, such as publicly available materials, review of databases and registers, published guidance, previous history and advice from authorities and other relevant persons.
102. Table 5-1 and Table 5-2 of the Environment Plan provide a comprehensive overview of the identification and assessment of the relevant persons (outside of those addressed at [91]-[100] above) falling within reg 11A(1)(d). I considered the nature of the activity, description of the environment and the possible impacts and risks of the activity have been taken into account when determining whose functions, interests and activities may be affected. For example:
- a. the titleholders considered all of the known environment values and sensitivities within the full extent of the environment that may be affected by the planned and unplanned impacts and risks of the activity when determining relevant persons; and
 - b. the titleholders considered the nature and scale of the activity and all of the possible impacts and risks of the activity when determining relevant persons.
103. I am satisfied that the process of identifying these other relevant persons was sufficient and appropriate to the activity.
104. Having identified these relevant persons, I considered the information that had been provided to them in accordance with reg 11A(2). I considered that the information provided was sufficient, in particular:
- a. the Environment Plan includes a description of the approach to provision of sufficient information that takes into account the functions, interests or activities of relevant persons and the possible consequences of the activity that may affect them;
 - b. the consultation opportunity provided relevant persons with the opportunity to provide input and engage in a genuine two-way dialogue. I noted that offers were made to meet and discuss with relevant persons and steps were taken by the titleholders to create awareness of the activity and to encourage potentially relevant persons to make themselves known to the titleholders;

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- c. the titleholders tailored the information to suit the needs of the different types of relevant persons and provided information in a form that is readily accessible and appropriate for the relevant person being consulted. Further, the titleholders used different materials to support the provision of information that was suited to the relevant person being consulted, such as pictorials, graphics and maps; and
 - d. the titleholders considered the views of relevant persons as to what level of information is “sufficient” to allow the relevant person to make an informed assessment of the possible consequences of the activity on the functions, interest or activities of the relevant person. In particular, the titleholders considered requests for additional information by certain relevant persons and provided such additional information in response to reasonable requests. Although there are examples where the titleholders did not provide certain relevant persons with additional information requested (e.g. scientific literature, copy of the latest version of the Environment Plan), I am satisfied that sufficient information was made available to the relevant person including: a link to the publicly available Environment Plan; the Consultation Information Sheet; numerous email responses tailored to a relevant person’s objections and claims raised; as well as the measures the titleholders proposes to adopt as a result of the consultation undertaken.
105. I noted that the period for consultation was determined on a case-by-case basis. The Environment Plan described the approach taken to determining a reasonable period based on consideration of the relevant person’s particular circumstances on a case-by-case basis and includes consideration of the nature, scale and complexity of the activity, as well as the extent and severity of potential impacts and risks on each relevant person’s functions, interests or activities. I acknowledged that the titleholders considered relevant persons’ views of what constitutes a reasonable period for consultation, considered requests for additional time by relevant persons, with additional time provided in response to reasonable requests. I also noted that the titleholders was proactive in sending reminders to relevant persons about impending dates for providing any response. Taking all of these matters into account, I am satisfied that a reasonable period for consultation had been given (as per reg 11A(3)).
106. I accepted that reg 11A(4) was satisfied because relevant persons were informed (in similar terms to those at [83] above), that they may request that particular information provided during consultation not be published and information subject to such a request was not published.
107. For the purposes of reg 10A(g)(ii), I found that:
- a. information gathered through the consultation process with the other relevant persons under reg 11A(1)(d) has been incorporated into the Environment Plan, and effectively informed the identification of environmental values and sensitivities to ensure impacts and risks are reduced to as low as reasonably practicable and acceptable. For example, information obtained from relevant persons has informed the identification of environmental values and sensitivities where relevant and information obtained from relevant persons has been considered in the evaluation of environmental impacts and risks, and in the titleholders’ processes for demonstrating that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable and acceptable levels where relevant. This includes, but is not limited to, the provision of notifications to relevant persons and other marine users as agreed to during consultation, amendments made to the OPEP as a result of relevant persons’ feedback received in the preparation of the Environment Plan, and a revised cumulative underwater noise impact assessment being undertaken in response to information received;

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- b. the titleholders' assessment of merit and all responses to objections and claims are reasonable and supported, and the measures adopted (if any) because of the consultation are appropriate. For example:
 - i. in some cases, the titleholders' assessment of the merits of objections and claims did not result in the adoption of additional control measures because additional control measures were not reasonably practicable to implement and/or necessary to demonstrate that impacts and risks will be reduced to as low as reasonably practicable and acceptable levels. Those items that were the subject of objections and claims which NOPSEMA considered to be reasonable were required to be addressed through requests for information and opportunities to modify and resubmit. For example, in relation to controls for mitigating noise impacts to blue whales, the titleholders adopted additional control measures or improved performance standards which addressed the objections and claims of relevant persons.
 - ii. in other cases, the titleholders' assessment of the merits of objections and claims resulted in no additional control measures being adopted. I am already satisfied [at 42] that the titleholders has demonstrated that they were not reasonably practicable to implement and/or were not necessary to demonstrate that the impacts and risks of the activity will be reduced to as low as reasonably practicable and acceptable levels. For example, claims were raised about vessel collision risks on whale sharks and although no additional control measures were adopted, NOPSEMA considered this to be reasonable given the nearest biologically important area is more than 100 km from the operational area.

108. I was satisfied that the measures which the titleholders adopted following consultation were appropriate. Accordingly, I was reasonably satisfied that reg 10A(g)(ii) was met.

109. Considering the matters discussed above, I was reasonably satisfied that, in relation to relevant persons (other than those considered at [94]-[100] above) as defined by reg 11A(1)(d), the Environment Plan demonstrates that the titleholders has carried out the consultations required by Division 2.2A and the measures (if any) that the titleholders has adopted, or propose to adopt, because of the consultations are appropriate, as required by reg 10A(g).

Relevant persons under Regulation 11A(1)(e)

110. Reg 11A(1)(e) states that Woodside must consult with 'any other person or organisation that the titleholders considers relevant.'. The titleholders consulted with the following 'other persons or organisations' that it considered to be relevant:

- a. The Shire of Exmouth and Exmouth Community Reference Group;
- b. The City of Karratha and the Karratha Community Liaison Group;
- c. The Australian Marine Conservation Society (**AMCS**);

111. I was reasonably satisfied that consultations with these persons met the requirements in reg 11A(2)-(4). The Environment Plan demonstrates that consultation took the form of emails and presentations, and were over a reasonable period (ranging from April and September 2022 until March 2023). The information provided to the relevant persons was sufficient. Once again, the information that was provided was tailored to the particular relevant person. For example, the information provided to AMCS included a detailed attachment explaining the specifics of the activity and the 'themes' in which AMCS may have an interest and also raised that information which is sensitive could be requested not

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to be published. The presentation to community members was also specific. For example, the Exmouth presentation contained information about traffic through the local airport associated with the activity.

112. Table 5-4 of the Environment Plan demonstrates that no feedback, objections or claims were raised by any of these relevant persons, and that control measures were not necessary. I agreed with the conclusions in this table. No substantive responses were received (as opposed to queries), which required the titleholders to consider additional measures.
113. I also acknowledged the ongoing consultation commitment in the Environment Plan. I considered this was appropriate measure which would ensure that any future feedback, objections or claims which may arise from such persons would be assessed and reported.
114. I was, therefore, reasonably satisfied that Reg 10A(g) was met in relation to 'relevant persons' as defined by reg 11A(1)(e).

Regulation 10A(h) - The Environment Plan complies with the Act and the regulations.

115. I was required to be reasonably satisfied that the Environment Plan complied with the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (Cth) (**Act**). I was satisfied that the Environment Plan was compliant, noting in particular:
 - a. the requirements under s 571 of the Act, that the titleholders maintain financial assurance sufficient to give the titleholders the capacity to meet costs, expenses and liabilities arising in connection with, or as a result of the activity. The titleholders has provided a financial assurance confirmation form which I was satisfied was acceptable and demonstrated that the titleholders will maintain financial assurance in relation to the activity (and therefore complied with s 571);
 - b. the requirements under s 572, relating to the maintenance and removal of equipment. I noted that the Environment Plan includes commitments for avoiding the loss of streamers/dropped objects and for recovering accidentally lost streamers/dropped objects. I was reasonably satisfied that this demonstrated that the activity does not allow for any equipment or property to be left on the seabed at the completion of the petroleum (and therefore complied with s 572);
 - c. subject to findings in [93 - 99], the consultation process has assisted the titleholders to meet their obligation under s 280 of the Act which requires that it must carry out the activity in a manner that does not interfere with navigation, fishing, conservation of resources of the sea and seabed, other offshore electricity infrastructure and petroleum activities, and the enjoyment of native title rights and interests (within the meaning of the *Native Title Act 1993*) to a greater extent than is necessary for the reasonable exercise of the titleholders' rights and obligations.
116. Turning to the Regulations, for the reasons set out above (at [16]-[32]), I am satisfied that the Environment Plan addressed the content requirements of regs 13-16 with enough clarity, consistency and detail commensurate to the nature and scale of the activity.
117. I observed that the Environment Plan also stated as follows:
 - a. that the titleholders would report all reportable incidents to the regulator (orally) as soon as possible to NOPSEMA, but within two hours of the incident or of its detection, with a written report to follow in a form consistent with Form FM0831 – Reportable Environmental Incident;

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- b. that the titleholders will notify NOPSEMA no later than 15 days after the end of the calendar month using the NOPSEMA Form – Recordable Environmental Incident Monthly Summary Report of any recordable incident; and
 - c. that the titleholders will notify NOPSEMA of the commencement of the petroleum activities at least ten days before the activity commences and will notify NOPSEMA within ten days of completing the activity.
118. I am reasonably satisfied that the Environment Plan contained information necessary to be compliant with regs 26, 26A, 26AA and 29 of the Regulations. I also considered the titleholders' Environment Knowledge Management System enabled storage of records, and for them to be made available, as required by regs 27 and 28.
119. Based on the above, I am reasonably satisfied that the requirements of reg 10A(h) are met.

The appropriate conditions

120. I have found above that I am not reasonably satisfied that the criteria in reg 10A(b) and reg 10A(g) were met. On 13 July 2023, NOPSEMA invited the titleholders to comment on proposed conditions that I considered might be appropriate to address concerns I have raised above.
121. In response, the titleholders provided comments focused on ensuring the conditions were clear and could be implemented. NOPSEMA took these into consideration when finalising the conditions but did not change the scope and intent of the conditions.
122. NOPSEMA concluded that the conditions were appropriate because they address the residual issues associated with reg 10A(b) and 10A(g) and the requirements are clear and implementable.

Other Considerations

Principles of Ecological Sustainable Development

123. The Regulations provide that their object is to ensure that any activity or greenhouse gas activity carried out in an offshore area is carried out in a manner consistent with the principles of ecologically sustainable development (**ESD**) set out in s 3A of the EPBC Act. I am satisfied that the Environment Plan was consistent with the principles of ESD. In this regard, the Environment Plan:
- a. included the titleholders' evaluation of the socio-economic, cultural and ecological features of the EMBA by the activity and consultation with relevant persons. The Environment Plan demonstrates an integrated approach to considering all environmental features, including relevant social, cultural and economic features that make up the definition of environment in reg 4. Further, the Environment Plan includes an evaluation of the potential impacts and risks of the activity on cultural heritage, commercial fisheries, traditional fisheries, tourism and recreation, commercial shipping, oil and gas and defence activities. I considered that these matters were consistent with ensuring that this decision-making process should effectively integrate both long-term and short-term economic, environment, social and equitable considerations;
 - b. detailed the titleholders' evaluation of environmental impacts and risks, the reasons and evidence in support of how the impacts and risks will be of an acceptable level and the scientific uncertainty associated with predictions of environmental impacts and risks (see [51] and [55]). I noted that the Environment Plan detailed additional control measures in relation to whales as

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- a precautionary approach given the uncertainty of possible impacts, and considered that the Environment Plan also included effective management measures to ensure the activity will not result in serious or irreversible environmental harm. Accordingly, I considered the Environment Plan was consistent with the 'precautionary principle' within the meaning of s 3A(b) of the EPBC Act, and that the conditions were a further precautionary measure;
- c. identifies the measures adopted by the titleholders to minimise the environmental impacts and risks of the activity. The titleholders applied the mitigation hierarchy, such that where avoidance was not possible, control measures were adopted to ensure impacts and risks are managed to as low as reasonably practicable and an acceptable level. I considered this was consistent with the principle that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations; and
 - d. in relation to the 'biodiversity principle':
 - i. included the titleholders' evaluation of environmental impacts and risks to the biodiversity and ecological values of the Commonwealth marine area, including EPBC Act listed threatened and/or migratory species, and the EPOs defined in the EP. I noted that the titleholders' defined acceptable levels of impact and risk for biodiversity and ecological values at levels that are below the significant impact criteria defined in Significant Impact Guidelines 1.1 – Matters of National Environment Significance for matters protected under Part 3 of the EPBC Act. Further, I found that the environmental impact and risk evaluations and EPOs collectively demonstrate that the activity will be managed so that impacts and risks to biological diversity and the ecological integrity of the Commonwealth marine area will be of an acceptable level.
 - ii. undertook a robust evaluation of environmental impacts and risks using appropriate impact assessment tools (such as acoustic modelling) to provide the basis for assessing higher order impacts and risks and demonstrating that impacts and risks will be managed at or below the acceptable level;
 - iii. contained an assessment against relevant requirements of statutory instruments to demonstrate that the activity would not be inconsistent with these instruments;
 - iv. the activity will not have a significant impact on MNES protected under the EPBC Act, including World Heritage properties, National Heritage properties, Ramsar wetlands of international significance, listed threatened species and communities, listed migratory species, Commonwealth marine areas, and the Great Barrier Reef Marine Park.
 - e. recognised that the titleholders is required to bear the costs relating to environmental management of the activity, to ensure that environmental impacts and risks are managed to as low as reasonably practicable and to an acceptable level. I considered that the onus is on the titleholders to protect ecological services and capital associated with the EMBA of the activity, and that, to the extent that the valuation principle is relevant for an individual activity, the Environment Plan demonstrates compliance and is consistent with Australian government legislation and policy requirements relating to environmental management.

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The Program: protected matters under Part 3 of the EPBC Act

124. The 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 Program responsibilities and commitments.
125. In implementing the Program, NOPSEMA conducts assessments of Environment Plans against the requirements of the Program, which include meeting the acceptance criteria and content requirements under the Regulations (which I have detailed above). 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.
126. As I have noted above, the only Part 3 EPBC Act protected matters are listed threatened species and migratory species. I considered that the activity under the Environment Plan:
- a. will not result in unacceptable impacts on any of the species and is not inconsistent with EPBC Act Part 13 Statutory Instruments as identified in Section 6.8 of the EP. I note my findings above (see [51 - 608]) where I have considered these documents when determining the acceptability of the Environment Plan where impacts to listed threatened species and ecological communities may arise;
 - b. has control measures in place to ensure that impacts to the Commonwealth marine area will be of an acceptable level having regard to EPBC Act Part 13 Statutory Instruments as identified in Section 6.8 of the EP, Guidance on Key Terms within the Blue Whale Conservation Management Plan (2021) published by DCCEEW, Commonwealth of Australia, Director of National Parks, Australian Marine Parks - North-west Marine Parks Network Management Plan 2018, Department of Sustainability, Environment, Water, Population and Communities, Marine Bioregional Plan for the North-west Marine Region; and Department of the Environment, Water, Heritage and the Arts, EPBC Act Policy Statement 2.1 – Interaction between offshore seismic exploration and whales: Industry Guidelines (September 2008) (see [49-56]).
 - c. Has control measures in place to ensure that the decision to accept the Environment Plan will not result in an unacceptable impact to a migratory species or an area of important habitat for a migratory species having regard to the documents identified in [b] (see [49-56]).

The Program: cumulative Environmental impacts

127. In the context of the Program, cumulative impact refers to the direct and indirect impacts of several different 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.
128. I considered the potential for cumulative environmental impacts to the Commonwealth marine area as required by the Program. I am reasonably satisfied that the environmental impacts of the activity combined with existing and proposed future pressures on the Commonwealth marine area, particularly to noise sensitive receptors including threatened and migratory whales, would be of an acceptable level because:
- a. the Environment Plan has evaluated the potential for cumulative impacts to relevant environmental receptors in the Commonwealth marine area that may be affected by the activity and adopts suitable control measures. In assessing the potential for cumulative environmental

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impacts, the Environment Plan has considered multiple noise exposures from the activity combined with other previous and proposed future noise generating activities in the region with overlapping temporal and/or spatial noise exposure extents; and

- b. the Environment Plan has evaluated the potential for cumulative impacts to cetaceans from multiple noise exposures over the duration of the activity, as well as previous and potential future marine seismic surveys over consecutive seasons in areas that are considered biologically important for marine mammal species. The cumulative impact assessment concludes that impacts resulting from cumulative exposure to underwater noise are more likely for species that may remain within, or adjacent to, the operational area for extended periods of time due to biologically important behaviours. Precautionary control measures have been adopted to ensure potential cumulative impacts to threatened and migratory whales are managed to as low as reasonably practicable and an acceptable level.
- c. the Environment Plan identifies that the confirmed start and end dates for the activity will be considered in conjunction with other proposed activities that are part of the Scarborough project to ensure consideration of possible concurrent and cumulative impacts.

The Program: indirect consequences of an action

129. Under the Program, NOPSEMA must have regard to EPBC Act requirements, 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. 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.
130. In assessing the Environment Plan, I had regard to the indirect consequences policy, in relation to indirect greenhouse gas (GHG) emissions. I gave consideration as to whether the activity is a substantial cause of GHG emissions from the processing, consumption, and combustion of gas, and are facilitated to a major extent by the activity, within the contemplation of the titleholders and are a reasonably foreseeable consequence of the activity.
131. Having regard to the indirect consequences policy, and the assessment teams' findings and conclusions, I agreed that:
 - a. the activity is a defined stage in the broader Scarborough project development, for which there is an accepted Offshore Project Proposal;
 - b. the extraction of gas for onshore processing is not included in the activity, and as such is not authorised by the Environment Plan, if accepted;
 - c. further activities, including drilling, completions, and installation of infrastructure, are required prior to the point any gas can be extracted and transported for gas processing and sale, and will themselves be subject to a separate assessment and approval process;
 - d. extraction and supply of gas for processing and subsequent sale, transport, consumption & combustion will require a future approval through an environment plan for operations.
132. Future activities require their own separate environment plan approvals, including consideration of the indirect consequences policy and appropriate coverage of 'impacts' of any activity based on the case specific circumstances. In the case of the Environment Plan, there is no resource extraction component to the activity and future regulatory approvals are required prior to any activity with a

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resource extraction component occurring. Given this, I consider that emissions from gas processing, consumption and combustion of Scarborough gas are not facilitated to a major extent by the activity and would not be considered a substantial cause of emissions generated in the future from processing, consumption, or combustion of gas.

Conclusion

133. For the reasons set out above, I decided to accept the Environment Plan subject to the following conditions:

- 1) Prior to commencement of the activity, the titleholders must consult with registered native title bodies corporate, representative Aboriginal / Torres Strait Islander bodies and other persons or organisations identified as a relevant person in relation to First Nations cultural heritage in Tables 5-3 and 5-4 of the EP to confirm whether:
 - a) They are aware of any people, who in accordance with Indigenous tradition, may have spiritual and cultural connections to the environment that may be affected by the activity that have not yet been afforded the opportunity to provide information that may inform the management of the activity.
 - b) There is any information they wish to provide on cultural features and/or heritage values.
- 2) The purpose of the consultation outlined in Condition 1 is to be communicated, and relevant persons are provided with a copy of the NOPSEMA Consultation on offshore environment plans Brochure as part of consultation.
- 3) The method of consultation is informed by the relevant persons being consulted.
- 4) If at any time, as a result of compliance with Condition 1, relevant persons are identified, they must be consulted in accordance with the NOPSEMA Guideline on Consultation in the course of preparing an environment plan (GL2086).
- 5) At any time, prior to or during the activity, if new cultural features and/or heritage values of places within the environment that may be affected by the activity are identified that are not described in the EP, the titleholders must:
 - a) Ensure the environmental impacts and risks of the activity continue to be managed to as low as reasonably practicable and an acceptable level.
 - b) Notify NOPSEMA in writing within 7 days of these cultural features and/or heritage values of places and the potential environmental impacts and risks.
- 6) The titleholders must submit a report to NOPSEMA no later than 14 days after the notification in Condition 5 which confirms the following:
 - a) The control measures that have been adopted to ensure that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable and an acceptable level.
 - b) The consultation undertaken with any relevant persons to develop these control measures, including:

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- i) the control measures that those persons considered reasonably necessary to manage impacts on the cultural features and/or heritage values in accordance with Indigenous tradition; and
 - ii) the views of the relevant persons in relation to the control measures.
- 7) Adopt appropriate measures in response to the claim from the Buurabalayji Thalanyji Aboriginal Corporation as to the need for collaboration with BTAC on the identification, management and protection of the Thalanyji people's cultural features of the environment that may be affected by the activity.
- 8) Ensure that the proposed spotter vessel with two trained and experienced marine fauna observers on board is utilised at all times during the survey to ensure effective detection of blue whales.

Signed



Environment Manager – Offshore Projects & Seismic

31 July 2023

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Attachment A – Legislative Framework

Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009

9 Submission of an environment plan

- (1) Before commencing an activity, a titleholders must submit an environment plan for the activity to the Regulator.

9AA Checking completeness of submitted environment plan

Within 5 business days after an environment plan is submitted to the Regulator under regulation 9, resubmitted in response to an invitation under regulation 9AC or resubmitted under subregulation 11C(2), the Regulator must decide provisionally whether the plan includes material apparently addressing all the provisions of Division 2.3 (Contents of an environment plan).

Note: The provisional decision is not a decision whether to accept the plan.

9AB Publishing environment plan and associated information

If the Regulator's provisional decision under regulation 9AA is that the environment plan includes material apparently addressing all the provisions of Division 2.3 (Contents of an environment plan), the Regulator must publish on the Regulator's website as soon as practicable:

- (a) the plan with the sensitive information part removed; and
- (b) the name of the titleholders who submitted the plan; and
- (c) a description of the activity or stage of the activity to which the plan relates; and
- (d) the location of the activity; and
- (e) a link or other reference to the place where the accepted offshore project proposal (if any) is published; and
- (f) details of the titleholders' nominated liaison person for the activity.

Note: If the plan is a seismic or exploratory drilling environment plan, the Regulator must also publish an invitation for public comment on the plan: see regulation 11B.

9A Further information

- (1) If a titleholders submits an environment plan, the Regulator may request the titleholders to provide further written information about any matter required by these Regulations to be included in an environment plan.
- (2) The request must:
 - (a) be in writing; and
 - (b) set out each matter for which information is requested; and

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- (c) specify a reasonable period within which the information is to be provided.
- (3) In providing information requested by the Regulator, the titleholders must resubmit to the Regulator the environment plan with the information incorporated, whether or not the titleholders also provides the information separately.
- (4) The Regulator must have regard to information that was requested by the Regulator, and provided by the titleholders in a resubmitted environment plan within the period specified or within a longer period agreed to by the Regulator.

10 Making decision on submitted environment plan

- (1) Within 30 days after the day described in subregulation (1A) for an environment plan submitted by a titleholders:
 - (a) if the Regulator is reasonably satisfied that the environment plan meets the criteria set out in regulation 10A, the Regulator must accept the plan; or
 - (b) if the Regulator is not reasonably satisfied that the environment plan meets the criteria set out in regulation 10A, the Regulator must give the titleholders notice in writing under subregulation (2); or
 - (c) if the Regulator is unable to make a decision on the environment plan within the 30 day period, the Regulator must give the titleholders notice in writing and set out a proposed timetable for consideration of the plan.
- (1A) For the purposes of subregulation (1), the day is:
 - (a) the day the Regulator publishes the plan (with the sensitive information part removed) under regulation 9AB; or
 - (b) if the environment plan is a seismic or exploratory drilling environment plan—the day the Regulator receives the documents under paragraph 11B(3)(b) and, if relevant, paragraph 11B(3)(c).

Note 1: Those paragraphs are about documents that must be given to the Regulator after the end of a 30-day period for public comment on a seismic or exploratory drilling environment plan. Regulation 11B requires the Regulator to consider certain public comments on a seismic or exploratory drilling environment plan in making a decision to take action under this regulation.

Note 2: A seismic or exploratory drilling environment plan is taken to have been withdrawn (so the Regulator need not act under this regulation in relation to it) if the Regulator does not receive the documents under paragraph 11B(3)(b) and, if relevant, paragraph 11B(3)(c): see subregulation 11B(7).

- (2) A notice to a titleholders under this subregulation must:
 - (a) state that the Regulator is not reasonably satisfied that the environment plan submitted by the titleholders meets the criteria set out in regulation 10A; and

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- (b) identify the criteria set out in regulation 10A about which the Regulator is not reasonably satisfied; and
 - (c) set a date by which the titleholders may resubmit the plan.
- (3) The date referred to in paragraph (2)(c) must give the titleholders a reasonable opportunity to modify and resubmit the plan.
- (4) Within 30 days after the titleholders has resubmitted the modified plan:
- (a) if the Regulator is reasonably satisfied that the environment plan meets the criteria set out in regulation 10A, the Regulator must accept the plan; or
 - (b) if the Regulator is still not reasonably satisfied that the environment plan meets the criteria set out in regulation 10A, the Regulator must:
 - (i) give the titleholders a further notice under subregulation (2); or
 - (ii) refuse to accept the plan; or
 - (iii) act under subregulation (6); or
 - (c) if the Regulator is unable to make a decision on the environment plan within the 30 day period, the Regulator must give the titleholders notice in writing and set out a proposed timetable for consideration of the plan.
- (5) If the titleholders does not resubmit the plan by the date referred to in paragraph (2)(c), or a later date agreed to by the Regulator, the Regulator must:
- (a) refuse to accept the plan; or
 - (b) act under subregulation (6).
- (6) For subparagraph (4)(b)(iii) and paragraph (5)(b), the Regulator may do either or both of the following:
- (a) accept the plan in part for a particular stage of the activity;
 - (b) accept the plan subject to limitations or conditions applying to operations for the activity.
- (7) A decision by the Regulator to accept, or refuse to accept, an environment plan is not invalid only because the Regulator did not comply with the 30 day period in subregulation (1) or (4).

10A Criteria for acceptance of environment plan

For regulation 10, the criteria for acceptance of an environment plan are that the plan:

- (a) is appropriate for the nature and scale of the activity; and
- (b) demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable; and

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- (c) demonstrates that the environmental impacts and risks of the activity will be of an acceptable level; and
- (d) provides for appropriate environmental performance outcomes, Environmental performance standards and measurement criteria; and
- (e) includes an appropriate implementation strategy and monitoring, recording and reporting arrangements; and
- (f) does not involve the activity or part of the activity, other than arrangements for Environment monitoring or for responding to an emergency, being undertaken in any part of a declared World Heritage property within the meaning of the EPBC Act; and
- (g) demonstrates that:
 - (i) the titleholders has carried out the consultations required by Division 2.2A; and
 - (ii) the measures (if any) that the titleholders has adopted, or proposes to adopt, because of the consultations are appropriate; and
- (h) complies with the Act and the regulations.

11A Consultation with relevant authorities, persons and organisations, etc

- (1) In the course of preparing an environment plan, or a revision of an environment plan, a titleholders must consult each of the following (a relevant person):
 - (a) each Department or agency of the Commonwealth to which the activities to be carried out under the environment plan, or the revision of the environment plan, may be relevant;
 - (b) each Department or agency of a State or the Northern Territory to which the activities to be carried out under the environment plan, or the revision of the environment plan, may be relevant;
 - (c) the Department of the responsible State Minister, or the responsible Northern Territory Minister;
 - (d) a person or organisation whose functions, interests or activities may be affected by the activities to be carried out under the environment plan, or the revision of the environment plan;
 - (e) any other person or organisation that the titleholders considers relevant.
- (2) For the purpose of the consultation, the titleholders must give each relevant person sufficient information to allow the relevant person to make an informed assessment of the possible consequences of the activity on the functions, interests or activities of the relevant person.
- (3) The titleholders must allow a relevant person a reasonable period for the consultation.
- (4) The titleholders must tell each relevant person the titleholders consults that:
 - (a) the relevant person may request that particular information the relevant person provides in the consultation not be published; and

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- (b) information subject to such a request is not to be published under this Part.

Division 2.3—Contents of an environment plan

12 Contents of an environment plan

An environment plan for an activity must include the matters set out in regulations 13, 14, 15 and 16.

13 Environment assessment

Description of the activity

- (1) The environment plan must contain a comprehensive description of the activity including the following:
 - (a) the location or locations of the activity;
 - (b) general details of the construction and layout of any facility;
 - (c) an outline of the operational details of the activity (for example, seismic surveys, exploration drilling or production) and proposed timetables;
 - (d) any additional information relevant to consideration of Environmental impacts and risks of the activity.

Note: An environment plan will not be capable of being accepted by the Regulator if an activity or part of the activity, other than arrangements for Environment monitoring or for responding to an emergency, will be undertaken in any part of a declared World Heritage property—see regulation 10A.

Description of the environment

- (2) The environment plan must:
 - (a) describe the existing environment that may be affected by the activity; and
 - (b) include details of the particular relevant values and sensitivities (if any) of that environment.

Note: The definition of environment in regulation 4 includes its social, economic and cultural features.

- (3) Without limiting paragraph (2)(b), particular relevant values and sensitivities may include any of the following:
 - (a) the world heritage values of a declared World Heritage property within the meaning of the EPBC Act;
 - (b) the national heritage values of a National Heritage place within the meaning of that Act;
 - (c) the ecological character of a declared Ramsar wetland within the meaning of that Act;

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- (d) the presence of a listed threatened species or listed threatened ecological community within the meaning of that Act;
- (e) the presence of a listed migratory species within the meaning of that Act;
- (f) any values and sensitivities that exist in, or in relation to, part or all of:
 - (i) a Commonwealth marine area within the meaning of that Act; or
 - (ii) Commonwealth land within the meaning of that Act.

Requirements

- (4) The environment plan must:
 - (a) describe the requirements, including legislative requirements, that apply to the activity and are relevant to the environmental management of the activity; and
 - (b) demonstrate how those requirements will be met.

Evaluation of Environmental impacts and risks

- (5) The environment plan must include:
 - (a) details of the environmental impacts and risks for the activity; and
 - (b) an evaluation of all the impacts and risks, appropriate to the nature and scale of each impact or risk; and
 - (c) details of the control measures that will be used to reduce the impacts and risks of the activity to as low as reasonably practicable and an acceptable level.
- (6) To avoid doubt, the evaluation mentioned in paragraph (5)(b) must evaluate all the environmental impacts and risks arising directly or indirectly from:
 - (a) all operations of the activity; and
 - (b) potential emergency conditions, whether resulting from accident or any other reason.

Environmental performance outcomes and standards

- (7) The environment plan must:
 - (a) set environmental performance standards for the control measures identified under paragraph (5)(c); and
 - (b) set out the environmental performance outcomes against which the performance of the titleholders in protecting the environment is to be measured; and
 - (c) include measurement criteria that the titleholders will use to determine whether each environmental performance outcome and environmental performance standard is being met.

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14 Implementation strategy for the environment plan

- (1) The environment plan must contain an implementation strategy for the activity in accordance with this regulation.
- (2) The implementation strategy must:
 - (a) state when the titleholders will report to the Regulator in relation to the titleholders' environmental performance for the activity; and
 - (b) provide that the interval between reports will not be more than 1 year.

Note: Regulation 26C requires a titleholders to report on environmental performance in accordance with the timetable set out in the environment plan.

- (3) The implementation strategy must contain a description of the Environment management system for the activity, including specific measures to be used to ensure that, for the duration of the activity:
 - (a) the environmental impacts and risks of the activity continue to be identified and reduced to a level that is as low as reasonably practicable; and
 - (b) control measures detailed in the environment plan are effective in reducing the environmental impacts and risks of the activity to as low as reasonably practicable and an acceptable level; and
 - (c) environmental performance outcomes and standards set out in the environment plan are being met.
- (4) The implementation strategy must establish a clear chain of command, setting out the roles and responsibilities of personnel in relation to the implementation, management and review of the environment plan, including during emergencies or potential emergencies.
- (5) The implementation strategy must include measures to ensure that each employee or contractor working on, or in connection with, the activity is aware of his or her responsibilities in relation to the environment plan, including during emergencies or potential emergencies, and has the appropriate competencies and training.
- (6) The implementation strategy must provide for sufficient monitoring, recording, audit, management of nonconformance and review of the titleholders' environmental performance and the implementation strategy to ensure that the environmental performance outcomes and standards in the environment plan are being met.
- (7) The implementation strategy must provide for sufficient monitoring of, and maintaining a quantitative record of, emissions and discharges (whether occurring during normal operations or otherwise), such that the record can be used to assess whether the Environmental performance outcomes and standards in the environment plan are being met.
- (8) The implementation strategy must contain an oil pollution emergency plan and provide for the updating of the plan.

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(8AA) The oil pollution emergency plan must include adequate arrangements for responding to and monitoring oil pollution, including the following:

- (a) the control measures necessary for timely response to an emergency that results or may result in oil pollution;
- (b) the arrangements and capability that will be in place, for the duration of the activity, to ensure timely implementation of the control measures, including arrangements for ongoing maintenance of response capability;
- (c) the arrangements and capability that will be in place for monitoring the effectiveness of the control measures and ensuring that the environmental performance standards for the control measures are met;
- (d) the arrangements and capability in place for monitoring oil pollution to inform response activities.

(8A) The implementation strategy must include arrangements for testing the response arrangements in the oil pollution emergency plan that are appropriate to the response arrangements and to the nature and scale of the risk of oil pollution for the activity.

(8B) The arrangements for testing the response arrangements must include:

- (a) a statement of the objectives of testing; and
- (b) a proposed schedule of tests; and
- (c) mechanisms to examine the effectiveness of response arrangements against the objectives of testing; and
- (d) mechanisms to address recommendations arising from tests.

(8C) The proposed schedule of tests must provide for the following:

- (a) testing the response arrangements when they are introduced;
- (b) testing the response arrangements when they are significantly amended;
- (c) testing the response arrangements not later than 12 months after the most recent test;
- (d) if a new location for the activity is added to the environment plan after the response arrangements have been tested, and before the next test is conducted—testing the response arrangements in relation to the new location as soon as practicable after it is added to the plan;
- (e) if a facility becomes operational after the response arrangements have been tested and before the next test is conducted—testing the response arrangements in relation to the facility when it becomes operational.

(8D) The implementation strategy must provide for monitoring of impacts to the environment from oil pollution and response activities that:

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- (a) is appropriate to the nature and scale of the risk of environmental impacts for the activity; and
 - (b) is sufficient to inform any remediation activities.
- (8E) The implementation strategy must include information demonstrating that the response arrangements in the oil pollution emergency plan are consistent with the national system for oil pollution preparedness and response.
- (9) The implementation strategy must provide for appropriate consultation with:
- (a) relevant authorities of the Commonwealth, a State or Territory; and
 - (b) other relevant interested persons or organisations.
- (10) The implementation strategy must comply with the Act, the regulations and any other environmental legislation applying to the activity.

15 Details of titleholders and liaison person

- (1) The environment plan must include the following details for the titleholders:
- (a) name;
 - (b) business address;
 - (c) telephone number (if any);
 - (d) fax number (if any);
 - (e) email address (if any);
 - (f) if the titleholders is a body corporate that has an ACN (within the meaning of the Corporations Act 2001)—ACN.
- (2) The environment plan must also include the following details for the titleholders' nominated liaison person:
- (a) name;
 - (b) business address;
 - (c) telephone number (if any);
 - (d) fax number (if any);
 - (e) email address (if any).
- (3) The environment plan must include arrangements for notifying the Regulator of a change in the titleholders, a change in the titleholders' nominated liaison person or a change in the contact details for either the titleholders or the liaison person.

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16 Other information in the environment plan

The environment plan must contain the following:

- (a) a statement of the titleholders' corporate environmental policy;
- (b) a report on all consultations under regulation 11A of any relevant person by the titleholders, that contains:
 - (i) a summary of each response made by a relevant person; and
 - (ii) an assessment of the merits of any objection or claim about the adverse impact of each activity to which the environment plan relates; and
 - (iii) a statement of the titleholders' response, or proposed response, if any, to each objection or claim; and
 - (iv) a copy of the full text of any response by a relevant person;
- (c) details of all reportable incidents in relation to the proposed activity.

Environment Protection and Biodiversity Conservation Act 1999

3A Principles of ecologically sustainable development

The following principles are principles of ecologically sustainable development:

- (a) decision-making processes should effectively integrate both long-term and short-term economic, Environment, social and equitable considerations;
- (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 Environment degradation;
- (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
- (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;
- (e) improved valuation, pricing and incentive mechanisms should be promoted.

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Attachment B

- a. The EP, comprising:
 - i. Scarborough 4D B1 Marine Seismic Survey Environment Plan (Revision 7, June 2023);
 - ii. Scarborough 4D Baseline (B1) Marine Seismic Survey (MSS) Oil Pollution First Strike Plan (Revision 0, August 2021); and
 - iii. Sensitive Stakeholder Information Report – Scarborough 4D B1 Marine Seismic Survey Environment Plan (Revision 7, June 2023).
 - iv. Material referenced in the EP that was important evidence for making the case that impacts and risks will be managed to ALARP and acceptable levels.
- b. The Program
- c. Policies and guidelines:
 - i. NOPSEMA Assessment policy (N-04000-PL0050);
 - ii. NOPSEMA Environment plan assessment policy (N-04750-PL1347);
 - iii. NOPSEMA Financial assurance for petroleum titles policy (N-04730-PL1780);
 - iv. NOPSEMA Environment plan decision making guideline (N-04750-GL1721);
 - v. NOPSEMA Financial assurance for petroleum titles guideline (N-04730-GL1381);
 - vi. NOPSEMA Consultation with Commonwealth agencies with responsibilities in the marine area guideline (N-06800-GL1887);
 - vii. NOPSEMA Consultation in the course of preparing an environment plan (N-04750-GL2086);
 - viii. Department of the Environment, Water, Heritage and the Arts, Significant Impact Guidelines 1.1 – Matters of National Environment Significance, EPBC Act Policy Statement (2013);
 - ix. Department of Agriculture, Water, and the Environment, 'Indirect consequences' of an action: section 572E of the EPBC Act (2013); and
 - x. Department of the Environment, Water, Heritage and the Arts, EPBC Act Policy Statement 2.1 – Interaction between offshore seismic exploration and whales: Industry Guidelines (September 2008);
- d. Guidance:
 - i. NOPSEMA Environment plan content requirements guidance note (N-04750-GN1344);
 - ii. NOPSEMA Petroleum activities and Australian Marine Parks guidance note (N-04750-GN1785);
 - iii. NOPSEMA Oil pollution risk management guidance note (N-04750-GN1488);
 - iv. NOPSEMA Operational and scientific monitoring programs information paper (N-04750-IP1349);

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- v. NOPSEMA Acoustic impact evaluation and management information paper (N-04750-IP1765);
 - vi. Department of the Environment, Engage Early – Guidance for proponents on best practice Indigenous engagement for Environment assessments under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (February 2016)
 - vii. The Interim Engaging with First Nations People and Communities on Assessments and Approvals under Environment Protection and Biodiversity Conservation Act 1999 (interim guidance) (2023);
- e. Procedures:
- i. NOPSEMA Environment plan assessment standard operating procedure (N-04750-SOP1369).
- f. Other relevant documents and records:
- i. relevant plans of management, recovery plans, conservation advice and other guidance for matters protected under the EPBC Act including:
 - A. Commonwealth of Australia, Conservation Management Plan for the Blue Whale 2015–2025 including Guidance on Key Terms within the Blue Whale Conservation Management Plan (2021) and Blue Whale Conservation Management Plan – FAQs published by NOPSEMA.
 - B. Commonwealth of Australia, Director of National Parks, Australian Marine Parks - North-west Marine Parks Network Management Plan 2018.
 - C. Department of Sustainability, Environment, Water, Population and Communities, Marine Bioregional Plan for the North-west Marine Region; and
 - ii. Aboriginal cultural heritage advice in relation to the proposed Scarborough 4D B1 Marine Seismic Survey, Report prepared by Extent Heritage Pty Ltd for NOPSEMA, 18 October 2022
 - iii. the scientific literature cited in the EP
 - iv. Findings and Conclusions of the assessment team as recorded in NOPSEMA's Regulatory Management System
- g. Relevant persons correspondence received post-submission of the EP

Table 5-3: Assessment of relevance

Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth and WA State Government Departments or Agencies – Marine			
Australian Border Force (ABF)	Responsible for coordinating maritime security	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). ABF's functions may be relevant to the activity as there are proposed vessel activities.	Yes
Australian Fisheries Management Authority (AFMA)	Responsible for managing Commonwealth fisheries	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). The North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA. AFMA's functions may be relevant to the activity as the North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA.	Yes
Australian Hydrographic Office (AHO)	Responsible for maritime safety and Notices to Mariners	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). AHO's functions may be relevant to the activity as there are proposed vessel activities.	Yes
Australian Maritime Safety Authority (AMSA) – Marine Safety	Statutory agency for vessel safety and navigation	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). AMSA – Marine Safety's functions may be relevant to the activity as there are proposed vessel activities.	Yes
Australian Maritime Safety Authority (AMSA) – Marine Pollution	Legislated responsibility for oil pollution response in Commonwealth waters	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). AMSA – Marine Pollution's functions may be relevant to the activity as the proposed activity has a hydrocarbon spill risk which may require AMSA response in Commonwealth waters.	Yes
Department of Agriculture, Fisheries and Forestry (DAFF) – Fisheries (formerly DAWE)	Responsible for implementing Commonwealth policies and programs to support agriculture, fishery, food and forestry industries	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). The North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA. DAFF – Fisheries' (formerly DAWE) functions may be relevant to the activity as the North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Department of Defence (DoD)	Responsible for defending Australia and its national interests.	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(a). DoD's functions may be relevant to the activity as defence training areas lie within the EMBA.	Yes
Department of Primary Industries and Regional Development (DPIRD)	Responsible for managing State fisheries	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). No State fisheries are active in the Operational Area. The Marine Aquarium Managed Fishery, Mackerel Managed Fishery (Area 2 and 3), West Coast Deep Sea Crustacean Managed Fishery and Pilbara Line Fishery are active in the EMBA. DPIRD's functions may be relevant to the activity as the government department responsible for State fisheries.	Yes
Department of Transport (DoT)	Legislated responsibility for oil pollution response in State waters	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). The proposed activity has a hydrocarbon spill risk, which may require DoT response in State waters.	Yes
Department of Planning, Lands and Heritage (DPLH)	Responsible for state level land use planning and management, and oversight of Aboriginal cultural heritage and built heritage matters.	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). There is no known Maritime Cultural Heritage overlapping the EMBA.	No
Pilbara Ports Authority	Responsible for the operation of the Port of Dampier.	Woodside has applied its methodology for 'Government departments / agencies – marine' under regulation 11A(1)(b). The proposed activity does not have the potential to impact Pilbara Ports Authority's functions, interests or activities as the EMBA does not overlap the Pilbara Ports Authority's area of responsibility.	No
Commonwealth and WA State Government Departments or Agencies – Environment			
Department of Agriculture, Fisheries and Forestry (DAFF) – Biosecurity (marine pests, vessels, aircraft and personnel)	DCCEEW administrators, implements and enforces the Biosecurity Act 2015. The Department requests to be consulted where an activity	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a). DAFF – Biosecurity's (formerly DAWE) functions may be relevant to the proposed activities in the EMBA in the prevention of introduced marine species.	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
(formerly DAWE)	<p>has the potential to transfer marine pests.</p> <p>DCCEEW also has inspection and reporting requirements to ensure that all conveyances (vessels, installations and aircraft) arriving in Australian territory comply with international health regulations and that any biosecurity risk is managed.</p> <p>The Department requests to be consulted where an activity involves the movement of aircraft or vessels between Australia and offshore petroleum activities either inside or outside Australian territory.</p>		
Department of Climate Change, Energy, the Environment and Water Agriculture (DCCEEW) (formerly DAWE)	<p>Responsible for implementing Commonwealth policies and programs to support climate change, sustainable energy use, water resources, the environment and our heritage.</p> <p>Administers the Underwater Cultural Heritage Act 2018 in collaboration with the States, Northern Territory and Norfolk Island, which is responsible for the protection of shipwrecks, sunken aircraft and other</p>	<p>Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a).</p> <p>DCCEEW's (formerly DAWE) functions may be relevant to the proposed activities in the EMBA as there are potential environmental impacts from the proposed activity.</p> <p>There are known Maritime Cultural Heritage overlapping the EMBA.</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
	types of underwater heritage and their associated artefacts in Commonwealth waters.		
Director of National Parks (DNP)	Responsible for the management of Commonwealth parks and conservation zones.	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a). DNP's functions may be relevant to the activity as DNP requires an awareness of activities that occur within AMPs, and an understanding of potential impacts and risks to the values of parks (NOPSEMA guidance note: N-04750-GN1785 A620236; June 2020). Titleholders are required to consult DNP on offshore petroleum and greenhouse gas exploration activities if they occur in, or may impact on the values of marine parks, including where potential spill response activities may occur in the event of a spill (i.e. scientific monitoring).	Yes
Ningaloo Coast World Heritage Advisory Committee (NCWHAC)	Supports the DBCA to manage the Ningaloo Coast World Heritage Area.	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(a). The proposed activity does not have the potential to impact NCWHAC's functions, interests or activities as the EMBA does not overlap the Ningaloo Marine Park.	No
Department of Biodiversity, Conservation and Attractions (DBCA)	Responsible for managing WA's parks, forests and reserves to achieve wildlife conservation and provide sustainable recreation and tourism opportunities.	Woodside has applied its methodology for 'Government departments / agencies – environment' under regulation 11A(1)(b). The proposed activity EMBA does not overlap WA parks, forests or reserves. Activities have the potential to impact marine tourism in the EMBA.	Yes
Commonwealth and State Government Departments or Agencies – Industry			
Department of Industry, Science and Resources (DISR) (formerly DISER)	Department of relevant Commonwealth Minister.	Required to be consulted under regulation 11A(1)(a).	Yes
Department of Mines, Industry Regulation and Safety (DMIRS)	Department of relevant State Minister	Required to be consulted under regulation 11A(1)(c).	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth Commercial fisheries and representative bodies			
North West Slope and Trawl Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery overlaps the EMBA and has been active in the EMBA within the last 5 years.	Yes
Southern Bluefin Tuna Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the EMBA it has not been active in the EMBA within the last 5 years. Woodside does not consider that the proposed activity will present a risk to licence holders, given since 1992, the majority of Australian catch has concentrated in south-eastern Australia. (Patterson et al., 2022). In addition, given fishing methods by licence holders for species fished in this fishery (Australia has a 35% share of total global allowable catch of Southern Bluefin Tuna, which is value-added through tuna ranching near Port Lincoln (South Australia), or fishing effort in New South Wales (Australian Southern Bluefin Tuna Industry Association).	No
Western Deepwater Trawl Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery overlaps the EMBA and has been active in the EMBA within the last 5 years.	Yes
Western Skipjack Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps Operational Area and EMBA, it has not been active in the EMBA within the last 5 years. Woodside does not consider that the activity will present a risk to licence holders, given the fishery spans the Australian Fishing Zone west of Victoria and the Torres Strait. The Fishery is not currently active and no fishing has occurred since 2009 (Patterson et al., 2022). In addition, interactions are not expected given the species' pelagic distribution fishing methods for species fished by licence holders.	No
Western Tuna and Billfish Fishery	Commonwealth commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps Operational Area and EMBA, it has not been active in the Operational Area or EMBA within the last 5 years.	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth Fisheries Association (CFA)	Represents the interests of commercial fishers with licences in Commonwealth waters	Woodside does not consider that the activity will present a risk to licence holders, given fishing methods for species fished by licence holders. Future interactions are not expected given the species' pelagic distribution.	
Australian Southern Bluefin Tuna Industry Association (ASBTIA)	Represents the interests of the Southern Bluefin Tuna Fishery and Western Skipjack Fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA. CFA's functions may be relevant to the activity as the North West Slope and Trawl Fishery and Western Deepwater Trawl Fishery are active in the EMBA.	Yes
Tuna Australia	Represents the interests of the Western Tuna and Billfish Fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The Southern Bluefin Tuna Fishery has been assessed as not relevant to the proposed activity. As the peak representative body for the Southern Bluefin Tuna Fishery, the ASBTIA has also been assessed as not relevant. Woodside has provided information to the ASBTIA at its discretion in line with Section 5.3.4 on AFMA advice that it expects all Commonwealth fishers who have entitlements to fish within the proposed area to be consulted, which can be through the relevant fishing industry associations.	No
Pearl Producers Association (PPA)	Peak representative organisation of The Australian South Sea Pearling Industry, with members in Western	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The Western Tuna and Billfish Fishery has been assessed as not relevant to the proposed activity. As the peak representative body for the Western Tuna and Billfish Fishery, Tuna Australia has also been assessed as not relevant. Woodside has provided information to Tuna Australia at its discretion in line with Section 5.3.4 on AFMA advice that it expects all Commonwealth fishers who have entitlements to fish within the proposed area to be consulted, which can be through the relevant fishing industry associations.	No
		Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The Pearl Oyster Managed Fishery has been assessed as not relevant to the proposed activity. As the peak representative body for the Pearl Oyster Managed Fishery, the PPA has also been assessed as not relevant.	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
	Australia and the Northern Territory		
State Commercial fisheries and representative bodies			
Marine Aquarium Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area it has not been active in the Operational Area within the last 5 years. The fishery has been active in the EMBA in the last 5 years.	Yes
South West Coast Salmon Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area and EMBA, the fishery has not been active in the Operational Area or EMBA within the last 5 years. Woodside does not consider that the activity will present a risk to licence holders, given fishers are active south of Perth and from the beach (previous WAFIC advice).	No
Mackerel Managed Fishery (Area 2 and 3)	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, it has not been active in the Operational Area within the last 5 years - no fishing occurs due to the water depths and distance from shore. The fishery has been active in the EMBA in the last 5 years.	Yes
Pilbara Crab Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area and EMBA, the fishery has not been active in the Operational Area or EMBA within the last 5 years. The Operational Area overlaps with a closed area of the fishery (as per Schedule 2 of the draft Management Plan [DPIRD, 2018]) and therefore, fishing activity within the Operational Area is currently not permitted.	No
West Coast Deep Sea Crustacean Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, the fishery has not been active in the Operational Area within the last 5 years. Fishing effort is primarily concentrated between Fremantle and Carnarvon. A single 10 nm CAES block (202125) was reportedly fished on the Exmouth Plateau at the southern	Yes

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		boundary of the Operational Area sometime between 2003 and 2010 (How et al., 2015, 2017). However, fishing effort has not been reported here since and more recent catch and effort data (2010–2019) confirms no catch or effort within the Operational Area; the closest blocks fished during this period were located about 300 km south (10 nm CAES block 230130) of the Operational Area (DPIRD, 2021). The fishery has been active in the EMBA in the last 5 years.	
Pearl Oyster Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area. The fishery overlaps the EMBA but has not been active in the EMBA within the last 5 years. Woodside does not consider that the activity will present a risk to licence holders given fishing methods and location for species fished by licence holders (fishing effort is mostly focussed in shallow coastal waters of 10-15 m depth, with a maximum depth of 35 m) (Lulofs et al. 2002).	No
Western Australian Sea Cucumber Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, the fishery has not been active in the Operational Area within the last 5 years. Due to water depth, distance offshore, and distance from popular fishing spots, fishers do not collect sea cucumber within the Operational Area. The fishery has not been active in the EMBA within the last 5 years.	No
West Coast Rock Lobster Managed Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area. The fishery overlaps the EMBA but has not been active in the EMBA in the last 5 years.	No
Demersal Scalefish Fishery: Pilbara Trawl Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area or EMBA.	No
Pilbara Trap Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). The fishery does not overlap the Operational Area or EMBA.	No

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Pilbara Line Fishery	State commercial fishery	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). Although the fishery overlaps the Operational Area, it has not been active in the Operational Area within the last 5 years. The fishery has been active in the EMBA in the last 5 years.	Yes
Western Australian Fishing Industry Council (WAFIC)	Represents the interests of commercial fishers with licences in State waters.	Woodside has applied its methodology for 'Commercial fisheries (Commonwealth and State) and peak representative bodies' under regulation 11A(1)(d). No State fisheries are active in the Operational Area. The Marine Aquarium Managed Fishery, Mackerel Managed Fishery (Area 2 and 3), West Coast Deep Sea Crustacean Managed Fishery and Pilbara Line Fishery are active in the EMBA. WAFIC's functions may be relevant to the activity as the peak representative body for State fisheries.	Yes
Recreational marine users and representative bodies			
Exmouth recreational marine users	Exmouth-based dive, tourism and charter operators	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact Exmouth-based dive, tourism and charter operator's functions, interests or activities due to the location of activities and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Gascoyne Recreational Marine Users	Gascoyne-based dive, tourism and charter operators	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact Gascoyne-based dive, tourism and charter operator's functions, interests or activities due to the location of activities and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Recfishwest	Represents the interests of recreational fishers in WA.	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact recreational fishers' functions, interests or activities due to the location offshore and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Marine Tourism WA	Represents the interests of marine tourism in WA.	Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d).	Yes

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WA Game Fishing Association	Represents the interests of game fishers in WA.	Activities have the potential to impact recreational fishers' functions, interests or activities due to the location offshore and there has been recorded charter effort in the EMBA in the past 5 years. Woodside has applied its methodology for 'Recreational marine users and representative bodies' under regulation 11A(1)(d). Activities have the potential to impact game fishers' functions, interests or activities due to the location offshore and there has been recorded charter effort in the EMBA in the past 5 years.	Yes
Titleholders and Operators			
Chevron Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Western Gas	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Exxon Mobil Australia Resources Company	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Shell Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
INPEX Alpha Ltd	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Carnarvon Energy Ltd	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
BP Developments Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes

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Osaka Gas Gorgon	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Tokyo Gas Gorgon	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
JERA Gorgon	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
PE Wheatstone	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Kyushu Electric Wheatstone	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Eni Australia	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Fugro Exploration	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Finder No 9 /10 / 17	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
KUFPEC	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes

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Santos NA Energy Holdings / Santos Ltd / Santos WA Northwest / Santos Offshore // Santos (BOL) / Santos WA PVG	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
OMV Australia / Sapura OMV Upstream	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
JX Nippon O&G Exploration (Australia)	Titleholder or Operator	Woodside has applied its methodology for 'Titleholders and Operators' under regulation 11A(1)(d). Titleholder or Operator's permit areas overlaps the EMBA.	Yes
National Energy Resource Australia (NERA) Collaborative Seismic Environment Plan Project (CSEP) acting for a consortium of operators	Titleholder or Operator	Woodside has applied its methodology for 'Additional Persons' and 'Titleholders and Operators' under regulation 11A(1)(d). During the course of preparing the EP, NERA CSEP self-identified and requested to be consulted. Titleholder or Operator's permit areas overlaps the EMBA.	Yes
Peak Industry Representative bodies			
APPEA	Represents the interests of oil and gas explorers and producers in Australia.	Woodside has applied its methodology for 'Peak Industry Representative bodies' under regulation 11A(1)(d). APPEA's responsibilities are identified as having an intersect with Woodside's planned activities in the EMBA.	Yes
Traditional Custodians and nominated representative corporations			
Murujuga Aboriginal Corporation (MAC)	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). MAC is the Nominated Representative Corporation under the Burrup and Maitland Industrial Estates Agreement (BMIEA), which is coastally adjacent to the EMBA and underpins land access for the onshore component of the Scarborough Project. The EMBA does not overlap the Murujuga National Park. MAC was established to represent the members of competing Native Title claims over Murujuga, collectively known as the Ngarda Ngarii and comprising Marduhunera, Ngartluma,	Yes

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Ngarluma Aboriginal Corporation (NAC)	Representative Aboriginal Corporation	<p>Yaburara, Yindjibarndi and Wong-Goo-Ti-Oo people. The determination of the competing Native Title claims resulted in no native title being found over the lands subject to the BMIEA or below the low water mark.</p> <p>MAC also owns and co-manages the Murujuga National Park, is responsible for the Dampier Archipelago National Heritage Place and is progressing the World Heritage nomination of the Murujuga Cultural Landscape.</p> <p>Woodside has consulted with MAC in regard to the Scarborough Project area generally since 2018 and MAC has been involved in ethnographic surveys that included the planned activities of this EP.</p> <p>As discussed further below, Woodside engaged YMAC as the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia to confirm the best approach to confirm additional cultural values (if any) for the broader Scarborough Project, the scope of which included the proposed activity for this EP. YMAC advised that the most appropriate stakeholders for the Scarborough project generally are MAC and NAC, who are not represented by YMAC (refer to Table 5-4).</p> <p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Ngarluma/Yindjibarndi native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which NAC and the Yindjibarndi Aboriginal Corporation are the Registered Native Title Body Corporates for.</p> <p>NAC is party to the RTIO Ngarluma Indigenous Land Use Agreement (Body Corporate Agreement), which is coastally adjacent to the EMBA.</p> <p>As noted above (and discussed further below), Woodside sought guidance from YMAC as the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia to confirm the best approach to confirm additional cultural values (if any) for the broader Scarborough Project, the scope of which included the proposed activity for this EP. YMAC advised that the most appropriate stakeholders for the Scarborough project generally are MAC and NAC, who are not represented by YMAC (refer to Table 5-4).</p>	Yes
Wirrawandi Aboriginal Corporation (WAC)	Representative Aboriginal Corporation	<p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Yaburara & Mardudhunera People claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which WAC is the Registered Native Title Body Corporate for.</p>	Yes

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Nganhurra Thanardi Garrbu Aboriginal Corporation (NTGAC)	Representative Aboriginal Corporation	<p>WAC is party to the Cape Preston Project Deed (YM Mardie ILUA), Cape Preston West Export Facility ILUA, Kuruma Marthudunera and Yaburara and Coastal Mardudhunera ILUA and KM & YM ILUA, which are coastally adjacent to the EMBA.</p> <p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Gnulli, Gnulli #2 and Gnulli #3 - Yinggarda, Baiyungu and Thalanyji People native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which the Baiyungu, Thalanyji and Yinggarda people are party to. The NTGAC and YAC are the Registered Native Title Body Corporates holding native title on behalf of the Baiyungu, Thalanyji and Yinggarda people.</p> <p>The NTGAC is also party, with the WA State Government, to the Ningaloo Conservation Estate Indigenous Land Use Agreement (the ILUA) which is coastally adjacent to the EMBA. The NTGAC is responsible for the joint management of the inner Ningaloo Marine Park (State Waters), the Cape Range National Park and new conservation areas extending along the Ningaloo Coast, which runs in parallel to the outer Ningaloo Marine Park in Commonwealth waters.</p> <p>The NTGAC's nominated representative is the YMAC and the NTGAC executive officer and contact officer pursuant to the Corporations (Aboriginal and Torres Strait Islander) Act 2006 is employed by YMAC. Woodside has therefore consulted the NTGAC, via YMAC.</p>	Yes
Yinggarda Aboriginal Corporation (YAC)	Representative Aboriginal Corporation	<p>Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d).</p> <p>The Gnulli, Gnulli #2 and Gnulli #3 - Yinggarda, Baiyungu and Thalanyji People native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which the Baiyungu, Thalanyji and Yinggarda people are party to. The NTGAC and YAC are the Registered Native Title Body Corporates holding native title on behalf of the Baiyungu, Thalanyji and Yinggarda people.</p> <p>The YAC nominated representative was the YMAC and the YAC executive officer and contact officer pursuant to the Corporations (Aboriginal and Torres Strait Islander) Act 2006 is employed by YMAC. Woodside therefore consulted YAC, via YMAC. Woodside was advised that as of late April 2023, the nominated representative for YAC was now Gumala Aboriginal Corporation.</p>	Yes

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Robe River Kuruma Aboriginal Corporation (RRKAC)	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). There are no native title claims that the RRKAC is party to overlapping the EMBA or coastally adjacent to the EMBA. The RRKAC is party to the RTIO Kuruma Marthudunera People ILUA, Kuruma Marthudunera and Yaburara and Coastal Marthudunera ILUA and KM & YM ILUA, which are coastally adjacent to the EMBA.	Yes
Yindjibarndi Aboriginal Corporation	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). The Ngarluma/Yindjibarndi native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which NAC and the Yindjibarndi Aboriginal Corporation are the Registered Native Title Body Corporates for.	Yes
Buurabalayji Thalanyji Aboriginal Corporation (BTAC)	Representative Aboriginal Corporation	Woodside has applied its methodology for 'Traditional Custodians and Nominated Representative Corporations' under regulation 11A(1)(d). The Thalanyji native title claim does not overlap the EMBA. The claim is coastally adjacent to the EMBA, which BTAC is the Registered Native Title Body Corporate for. BTAC is also party to the Macedon ILUA which is coastally adjacent to the EMBA.	Yes
Native Title Representative Bodies			
Yamatji Marlpa Aboriginal Corporation (YMAC)	Native Title Representative Body	Woodside has applied its methodology for 'Native Title Representative Bodies' under regulation 11A(1)(d). YMAC is the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia. As such, they are not a Prescribed or Registered Native Title Body Corporate but exist to assist native title claimants and holders. The NTGAC's nominated representative is YMAC. Woodside has therefore consulted the NTGAC via YMAC. YMAC was also the nominated representative for YAC. Woodside was advised that as of late April 2023, the nominated representative for YAC is now Gumala Aboriginal Corporation. Woodside contacted YMAC to seek guidance with respect to the appropriate Traditional Custodian group(s) to engage with respect to the proposed activity where this was not clear.	Yes

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Historical cultural heritage groups or organisations			
Western Australian Museum	Manages 200 shipwreck sites of the 1,500 known to be located off the Western Australian coast.	Woodside has applied its methodology for 'Historical cultural heritage groups or organisations' under regulation 11A(1)(d). There are no known shipwrecks overlapping the EMBA which the Western Australian Museum may be responsible for.	No
Local government and community representative groups or organisations			
Shire of Exmouth	Local government governed by the Local Government Act 1995 representing the suburbs and localities of Exmouth, Learmonth and North West Cape.	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The Shire of Exmouth's area of responsibility does not overlap the EMBA. The Shire of Exmouth was consulted as a member of the Exmouth Community Reference Group. Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess the Shire of Exmouth as a relevant person.	Yes
City of Karratha	Local government governed by the Local Government Act 1995 representing the suburbs and localities of Baynton, Baynton West, Bulgarra, Cossack, Dampier, Gap Ridge, Karratha, Karratha Industrial Estate, Jingarri, Madigan, Millars Well, Nickoi, Pegs Creek, Point Samson, Roebourne, Whim Creek and Wickham.	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The City of Karratha's area of responsibility does not overlap the EMBA. The City of Karratha was consulted as a member of the Karratha Community Liaison Group. Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess the City of Karratha as a relevant person.	Yes
Exmouth Community Reference Group (CRG) Base Marine Bgahwan Marine	The Exmouth CRG represents the interests of a range of local government, industry and community organisations in relation to	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The Exmouth CRG's area of responsibility under its terms of reference overlaps the EMBA.	Yes

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Cape Conservation Group Inc. DBCA Department of Defence Department of Transport Exmouth Bus Charter Exmouth Chamber of Commerce and Industry Exmouth District High School Exmouth Freight and Logistics Exmouth Game Fishing Club Exmouth Tackle and Camping Supplies Exmouth Visitors Centre Exmouth Volunteer Marine Rescue Fat Marine Gascoyne Development Commission Gun Marine Services Ningaloo Lodge Offshore Unlimited Shire of Exmouth BHP Petroleum Santos Community Member	oil and gas matters in the Exmouth region.		
Karratha Community Liaison Group (KLG) WA Police	The KLG is the recognised community group that represents the interests of a range of local government,	Woodside has applied its methodology for 'Local government and community representative groups or organisations' under regulation 11A(1)(d). The KLG's area of responsibility under its terms of reference does not overlap the EMBA.	Yes

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Karratha Health Care Development WA Ngarluma Yindjibarndi Foundation Ltd (NYFL) Department of Education Pilbara Ports Authority Regional Development Australia Pilbara Development Commission Dampier Community Association City of Karratha Karratha & Districts Chamber of Commerce and Industry Horizon Power Murujuga Aboriginal Corporation (MAC)* Department of Local Government, Sport and Cultural Industries *MAC was consulted directly as described above.	industry and community organisations in relation to oil and gas matters in the Pilbara region.	Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess the KLG as a relevant person.	
Other non-government groups or organisations			
350 Australia (350A)	Non-government organisation	During the course of preparing the EP, 350A self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d). Woodside has assessed that 350A's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned	No

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Australasian Centre for Corporate Responsibility (ACCR)	Non-government organisation	<p>activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine ACCR's relevance for the proposed activity.</p> <p>Woodside has assessed that ACCR's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact ACCR at its discretion in line with Section 5.3.4.</p>	No
Australian Conservation Foundation (ACF)	Non-government organisation	<p>During the course of preparing the EP, ACF self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that ACF's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	Yes
Australian Marine Conservation Society (AMCS)	Non-government organisation	<p>Woodside has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine AMCS's relevance for the proposed activity.</p> <p>Woodside has assessed that AMCS's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Under regulation 11A(1)(e), Woodside, at its discretion, chose to assess AMCS as a relevant person.</p>	Yes
Climate Council	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine Climate Council's relevance for the proposed activity.</p> <p>Woodside has assessed that Climate Council's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact Climate Council at its discretion in line with Section 5.3.4.</p>	No
Conservation Council of Western Australia (CCWA)	Non-government organisation	<p>During the course of preparing the EP, CCWA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
		<p>has applied its methodology for 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that CCWA's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	
Doctors for the Environment (DEA)	Non-government organisation	<p>During the course of preparing the EP, DEA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that DEA's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	No
Extinction Rebellion WA (XRWA)	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine XRWA's relevance for the proposed activity.</p> <p>Woodside has assessed that XRWA's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact XRWA at its discretion in line with Section 5.3.4.</p>	No
Friends of Australian Rock Art. Inc (FARA)	Non-government organisation	<p>During the course of preparing the EP, FARA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that FARA's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	No
Greenpeace Australia Pacific (GAP)	Non-government organisation	<p>During the course of preparing the EP, GAP self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
International Fund for Animal Welfare (IFAW)	Non-government organisation	<p>Woodside has assessed that GAP's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine IFAW's relevance for the proposed activity.</p> <p>Woodside has assessed that IFAW's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact IFAW at its discretion in line with Section 5.3.4.</p>	No
Lock The Gate Alliance (LTGA)	Non-government organisation	<p>During the course of preparing the EP, LTGA self-identified, provided comment on the broader Scarborough Project and requested to be consulted on Scarborough EPs. Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d).</p> <p>Woodside has assessed that LTGA's public website material and feedback does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	No
Market Forces	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine Market Force's relevance for the proposed activity.</p> <p>Woodside has assessed that Market Force's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p> <p>Woodside chose to contact Market Force at its discretion in line with Section 5.3.4.</p>	No
Say No to Scarborough Gas (SNTSG)	Non-government organisation	<p>Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine SNTSG's relevance for the proposed activity.</p> <p>Woodside has assessed that SNTSG's public website material and feedback demonstrates an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).</p>	Yes

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Sea Shepherd Australia (SSA)	Non-government organisation	Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine SSA's relevance for the proposed activity. Woodside has assessed that SSA's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2). Under subregulation 11 A 1 (e), Woodside, at its discretion, chose to assess SSA as a relevant person.	Yes
The Wilderness Society (TWS)	Non-government organisation	Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine TWS's relevance for the proposed activity. Woodside has assessed TWS's public website material and feedback, with the latter demonstrating an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2).	Yes
World Wildlife Fund (WWF) Australia	Non-government organisation	Woodside has applied its methodology for 'Additional persons' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine WWF's relevance for the proposed activity. Woodside has assessed that WWF's public website material does not demonstrate an interest with the potential risks and impacts associated with planned activities in accordance with the intended outcome of consultation (as set out in Section 5.2). Woodside chose to contact WWF at its discretion in line with Section 5.3.4 .	No
Research institutes and local conservation groups or organisations			
University of Western Australia (UWA)	Research institute	Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine UWA's relevance for the proposed activity. There is no known research being undertaken by the UWA that intersects within the EMBA. Woodside chose to contact UWA at its discretion in line with Section 5.3.4 .	No
Western Australian Marine Science Institution (WAMSI)	Research institute	Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine WAMSI's relevance for the proposed activity. There is no known research being undertaken by WAMSI that intersects within the EMBA	No

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Person or Organisation	Summary of responsibilities and/or functions, interests or activities	Assessment of relevance	Relevant person
Commonwealth Scientific and Industrial Research Organisation (CSIRO)	Research institute	Woodside chose to contact WAMSI at its discretion in line with Section 5.3.4 . Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine CSIRO's relevance for the proposed activity. There is no known research being undertaken by CSIRO that intersects within the EMBA. Woodside chose to contact CSIRO at its discretion in line with Section 5.3.4 .	No
Australian Institute of Marine Science (AIMS)	Research institute	Woodside has applied its methodology for 'Research institutes and local conservation groups or organisations' under regulation 11A(1)(d) to determine AIMS's relevance for the proposed activity. There is no known research being undertaken by AIMS that intersects within the EMBA. Woodside chose to contact AIMS at its discretion in line with Section 5.3.4 .	No
Other			
Save Our Songlines (SOS) and/ or █████ and/ or █████	Representatives of Non-Government Organisation Save Our Songlines and/ or individuals █████ and/ or █████	Woodside has applied its methodology for 'Traditional Custodians and nominated representative corporations' and 'Other non-government groups or organisations' under regulation 11A(1)(d) to determine Save Our Songlines (SOS) and/ or █████ and/ or █████ relevance for the proposed activity. During the course of preparing the EP, Save Our Songlines and/ or █████ and/ or █████ self-identified and requested to be consulted on Scarborough EPs. Woodside has assessed that SOS and/ or █████ and/ or █████ feedback demonstrates an interest with the proposed activity.	Yes
Woodside Come Clean	Campaign website	Woodside Come Clean is not a registered organisation (i.e. no Australian Business Number (ABN)) and has no contact details publicly available. As this is not a group or organisation, but rather a campaign website, it would not be reasonable for Woodside to consider relevance for the proposed activity, nor attempt to consult. Irrespective, Woodside has reviewed the Woodside Come Clean public website material and determined that the material does not demonstrate any intersect with potential direct impacts specific to the proposed petroleum activity, while remaining in accordance with the intended outcome of consultation (as set out Section 5.2). Woodside notes that the Woodside Come Clean campaign website links to Say No to Scarborough Gas, which Woodside has consulted for the proposed activity.	No

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Table 5-4: Consultation report with relevant persons or organisations.

Commonwealth and WA State Government Departments or Agencies – Marine		
<p>Australian Border Force (ABF)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed ABF advising of the proposed activity (Appendix F, reference 1.2) and provided a Consultation Information Sheet. On 27 January 2023, Woodside emailed ABF with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy’s Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has addressed maritime security-related issues in Section 6 of this EP based on previous offshore activities.</p> <p>No additional measures or controls are required.</p>
<p>Australian Fisheries Management Authority (AFMA)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed AFMA advising of the proposed activity (Appendix F, reference 1.3) and provided a Consultation Information Sheet, a fisheries map and a list of previous seismic surveys. On 4 June 2021, AFMA responded, advising it was unable to provide comment on specific proposals, and directed Woodside to continue consulting with all fishers who have entitlements to fish within the proposed area via the relevant fishing industry associations or directly with fishers who hold entitlements in the area. On 3 February 2023, Woodside emailed AFMA with an update on the proposed activity (Appendix F, reference 1.71) and provided an updated Consultation Information Sheet and fisheries maps. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.77). 		
<p>Summary of Feedback, Objection or Claim</p> <p>AFMA has requested Woodside consult with operators who have entitlements to fish within the proposed area.</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy’s Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided information to relevant fishery licence holders as well as representative organisations on behalf of Commonwealth fishery licence holders who have entitlements to fish within the proposed area.</p> <p>Woodside has addressed AFMA’s feedback, including confirming that Woodside had provided information to relevant fishery licence holders as well as representative organisations on behalf of Commonwealth fishery licence holders who have entitlements to fish within the proposed area.</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Australian Hydrographic Office (AHO) / Australian Hydrographic Service (AHS)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed the AHO advising of the proposed activity (Appendix F, reference 1.4) and provided a Consultation Information Sheet, and shipping lanes map (Appendix F, reference 1.5). On 27 January 2023, Woodside emailed AHO with an update on the proposed activity (Appendix F, reference 1.53) and provided an updated Consultation Information Sheet and fisheries maps. Woodside confirmed it would make available a shipping lane map as soon as possible. On 30 January 2023, the AHO responded and acknowledged receipt of Woodside’s consultation email. On 28 February 2023, Woodside emailed AHO and provided an updated shipping lane map (Appendix F, reference 1.106). On 1 March 2023, the AHO responded and acknowledged receipt of Woodside’s consultation email. On 9 March 2023 Woodside emailed AHO with a corrected version of the shipping lane map (Appendix F, reference 1.106). On 10 March 2023, the AHO responded and acknowledged receipt of Woodside’s consultation email. 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	AHO has acknowledged receipt of Woodside's consultation emails. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	Woodside will notify the AHO no less than four working weeks before operations commence, as referenced as a C 1.1 in this EP. No additional measures or controls are required.
Australian Maritime Safety Authority (AMSA) - Marine Safety		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> • On 13 May 2021, Woodside emailed AMSA advising of the proposed activity (Appendix F, reference 1.6) and provided a Consultation Information Sheet, and shipping lanes map (Appendix F, reference 1.5). • On 18 May 2021, AMSA emailed Woodside requesting: <ul style="list-style-type: none"> - The AHO be contacted no less than four working weeks before operations commence for the promulgation of related notices to mariners. - AMSA's Joint Rescue Coordination Centre (JRCC) be notified at least 24–48 hours before operations commence - Provide updates to the AHO and JRCC should there be changes to the activity. - Vessels exhibit appropriate lights and shapes to reflect the nature of operations and comply with the International Rules of Preventing Collisions at Sea. - AMSA provided advice on obtaining vessel traffic plots, including digital datasets and maps. • On 22 July 2021, Woodside responded to AMSA's feedback and confirmed it would address AMSA's requests. • On 27 January 2023, Woodside emailed AMSA with an update on the proposed activity (Appendix F, reference 1.53) and provided an updated Consultation Information Sheet and fisheries maps. <ul style="list-style-type: none"> - Woodside confirmed it would make available a shipping lane map as soon as possible. • On 31 January 2023, AMSA emailed Woodside requesting: <ul style="list-style-type: none"> - Additional information relating to moorings and their potential impact on shipping traffic. - Woodside to confirm its current GIS data so that AMSA can map it and assess navigation safety. - Woodside to send its updated Shipping Lane figures. • On 10 February 2023, AMSA emailed Woodside and reiterated its 31 January 2023 request for additional information. • On 15 February 2023, AMSA emailed Woodside and reiterated its 31 January 2023 and 10 February 2023 request for additional information. • On 16 February 2023, Woodside received a phone message from AMSA requesting digital data regarding the proposed activity. • On 17 February 2023, Woodside had a phone conversation with AMSA to clarify the data required and was advised that AMSA would like the operational area polygons in shapefile format for the proposed activity. • On 17 February 2023, Woodside emailed AMSA the operational area polygons in shapefile format for the proposed activity. • On 21 February 2023, AMSA emailed Woodside: <ul style="list-style-type: none"> - Provided a vessel traffic plot showing AIS data and an updated vessel traffic plot for the Scarborough area of interest. - AMSA reiterated its 31 January 2023 request. • On 28 February 2023, Woodside emailed AMSA: <ul style="list-style-type: none"> - Provided additional information relating to the moorings (Appendix F, reference 1.105). - Provided an updated shipping lane map (Appendix F, reference 1.106). • On 3 March 2023 AMSA emailed Woodside: <ul style="list-style-type: none"> - Requested clarification on the vessel traffic plots provided and how the Environment that May Be Affected (EMBA) areas will actually be affected by working vessels, support craft and associated activities. - AMSA commented that the EMBA's are quite large unique areas, so AMSA is curious about the extent of vessel traffic and activity within these areas and lines of traffic and charted shipping fairways. • On 8 March 2023 Woodside emailed AMSA advising (Appendix F, reference 1.108): <ul style="list-style-type: none"> - The environment that may be affected (EMBA) is the largest spatial extent where the Petroleum Activities Program could potentially have an environmental consequence (direct or indirect impact). - The broadest extent of the EMBA takes into consideration planned and unplanned activities, and for this Environment Plan (EP) is determined by a highly unlikely release of marine diesel to the environment as a result of vessel collision. - The EMBA does not represent the extent of predicted impact of the highly unlikely marine diesel release. Rather, the EMBA represents the merged area of many possible paths a highly unlikely hydrocarbon release could travel depending on the weather and ocean conditions at the time of the release. This means in the highly unlikely event a hydrocarbon release does occur, the entire EMBA will not be affected and the specific and minimal part of the EMBA that is affected will only be known at the time of the release. - Woodside also provided an updated version of the shipping lane map noting there was an error on the previous version. 		

<p>Summary of Feedback, Objection or Claim</p> <p>AMSA has provided feedback relating to:</p> <ul style="list-style-type: none"> • Notification requirements • Update requirements • Vessel light and shapes <p>AMSA requested further information relating to:</p> <ul style="list-style-type: none"> • Moorings and their potential impact on shipping traffic • GIS data • Shipping Lane figures • Digital data • Vessel traffic plots and how the EMBA will be affected by working vessels, support craft and associated activities 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed AMSA's requests and provided additional information (see above and within the relevant response contained within Appendix F).</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside will notify AMSA's JRCC at least 24–48 hours before operations commence, as referenced as C 1.2 in this EP.</p> <p>Woodside will notify AHO no less than four working weeks before operations commence, as referenced as C 1.1 in this EP.</p> <p>Woodside considers the measures and controls in the EP are appropriate.</p>
<p>Australian Maritime Safety Authority (AMSA) – Marine Pollution</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> • On 13 May 2021, Woodside emailed AMSA advising of the proposed activity (Appendix F, reference 1.7) and provided a Consultation Information Sheet, and shipping lanes map (Appendix F, reference 1.5). • On 6 July 2021, Woodside emailed AMSA and provided the First Strike Plan (Appendix F, reference 1.25). • On 27 January 2023, Woodside emailed AMSA with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. • On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has addressed oil spill preparedness and response strategy planning in Appendix D. No additional measures or controls are required.</p>

Department of Climate Change, Energy, the Environment and Water Agriculture (DCCEE) / Department of Agriculture, Fisheries and Forestry (DAFF) – Fisheries (formerly DAWF)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 13 May 2021, Woodside emailed DAWF advising of the proposed activity considering biosecurity matters (Appendix F, reference 1.8) and provided a Consultation Information Sheet, and fisheries map (Appendix F, reference 1.9).
- On 25 May 2021, DAWF responded noting the information required and requested Woodside communicate future developments with the AFMA and the relevant fishing industry representation organisations.
- On 17 December 2021, Woodside emailed DAWF (prompted by Woodside to seek overall clarification):
 - Woodside sought clarification around the Blue Whale CMP, the Department's Guideline and NOPSEMA's FAQ in relation to the definition of, and Woodside's interpretation of BIA.
 - Woodside requested clarification of its understanding of the documents on the DAWF website, (Blue Whale CMP) which state that "BIAs are not defined under the EPBC Act, but they are areas that are particularly important for the conservation of protected species and where aggregations of individuals display biologically important behaviour such as calving, foraging, resting or migration. BIAs have been identified using expert scientific knowledge about species' distribution abundance and behaviour".
 - Woodside clarified that consequently, distribution in itself, is not a BIA (for blue whales); whereas areas where biologically important behaviour such as calving, foraging, resting or migration clearly are BIAs.
- On 20 December 2021, DAWF emailed Woodside:
 - DAWF advised that the definition provided is the agreed working definition of BIAs and this interpretation is correct. BIAs are not defined or described under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). They are however a geospatial tool used to inform regulatory decision-making given the biologically critical behaviours that they represent.
 - DAWF advised that the assumption is correct, that the entire distribution of the blue whale is not considered a BIA. The 'distribution BIA' for the blue whale, as designated in the National Conservation Values Atlas (NCVA) does not constitute a BIA (that represents an area where biologically important behaviour is displayed, such as foraging and migration for the blue whale). DAWF believe the distribution BIA was included in the NCVA following development of the Conservation Management Plan for the Blue Whale (CMP) to flag the importance of their range.
- On 30 March 2022, Woodside emailed DCCEE to ensure DCCEE was aware NOPSEMA had requested correspondence between DCCEE and
 - Woodside which must be compiled with regarding blue whale distribution and BIAs. Woodside advised details of the correspondence would be included for NOPSEMA's assessment of this EP.
- On 30 March 2022, DCCEE thanked Woodside for the advice and that DCCEE had been in contact with NOPSEMA and were aware of this requirement.
- On 3 February 2023, Woodside emailed DCCEE / DAFF - Fisheries with an update on the proposed activity (Appendix F, reference 1.54) and provided an updated Consultation Information Sheet and fisheries maps.
- On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.92).

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>In the course of preparing this and other Woodside EPs, DCCEE has provided clarification around the Blue Whale CMP, the Department's Guideline and NOPSEMA's FAQ in relation to the definition of BIAs. Woodside's interpretation of the Blue Whale CMP advice has been applied in the EP, see Section 4.6.3.1.</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside notes DCCEE clarification around the Blue Whale CMP, the Department's Guideline and NOPSEMA's FAQ in relation to the definition of BIAs. Woodside's interpretation of the Blue Whale CMP advice has been applied in the EP, see Section 4.6.3.1.</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>The Environment Plan demonstrates that the proposed activities are outside the boundaries of a proclaimed Commonwealth Marine Park and identifies that there are no credible impacts to the values of any Commonwealth Marine Parks as a result of planned activities (Section 4.9). While impacts to Commonwealth Marine Parks are possible in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of an incident, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>The Environment Plan demonstrates that there are no known underwater heritage sites or shipwrecks within the Petroleum Activities Area and identifies that there are no credible impacts as a result of planned activities (Section 4.10.1). While impacts to underwater heritage sites or shipwrecks are possible in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of an incident, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>Woodside has addressed maritime biosecurity issues in Section 6.7 of this EP based on previous offshore activities.</p> <p>No additional measures or controls are required.</p>

Department of Defence (DoD)	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DoD advising of the proposed activity (Appendix F, reference 1.10) and provided a Consultation Information Sheet, and defence map (Appendix F, reference 1.11). On 15 May 2021, DoD emailed Woodside: <ul style="list-style-type: none"> DoD advised that the activity area is located within the North West Exercise Area (NWXEA) and restricted airspace and unexploded ordnance (UXO) may be present on and in the sea floor within the NWXA. All activities in the area are conducted at Woodside's own risk. DoD advised that the Commonwealth of Australia, represented by the Department of Defence, takes no responsibility for: <ul style="list-style-type: none"> Reporting the location and type of UXO that may be in the areas. Identifying or removing any UXO from these areas. Any loss or damage suffered or incurred by Woodside Energy or any third party arising out of, or directly related to, UXO in the area. DoD require the following notifications: <ul style="list-style-type: none"> DoD - five weeks prior to the commencement of activities. Airservices Australia (if Notice to Airmen notification is required for activities in Restricted Airspace). AHO - three weeks prior to the commencement of activities. On 4 August 2021, Woodside emailed DoD: <ul style="list-style-type: none"> Woodside responded to DoD's feedback and noted the advice provided regarding risks and notification requirements. Woodside confirmed it will notify the Department of Defence at least five weeks prior to the commencement of activities. Woodside requested DoD provide shape files or further specific detail in relation to the mentioned UXO so that Woodside can then map it against the proposed activity. On 4 August 2021, DoD responded and provided a link to its mapping system which identifies UXO locations within the NWXEA. On 10 May 2022 Woodside emailed DoD to clarify the potential risk of UXOs in the Scarborough Development Operational Area. On 13 May 2022 DoD emailed Woodside: <ul style="list-style-type: none"> DoD noted that the UXO risk data has been updated. Currently the UXO webmap has one historical location but it falls outside of the proposed pipeline route. It is reasonable to assess the risk of UXO in the Operational Area to be negligible. On 13 May 2022, Woodside thanked DoD for their email of the same date and the information provided. On 25 August 2022, Woodside emailed DoD: <ul style="list-style-type: none"> Woodside noted DoD had previously confirmed there are no specific UXO records for activities in the North West Exercise Area (NWXEA) and it is reasonable to assess the risk to be negligible. Woodside asked for clarification as to whether the advice that there are no specific records of UXO in the area means that no categorisation is required and so no further advice is required. On 23 September 2022, Woodside followed up on its 25 August 2022 email. On 23 September 2022, DoD emailed Woodside: <ul style="list-style-type: none"> DoD confirmed that the area of the NWXA would be classed as Remote in accordance with its land counterpart. The risk of encountering UXO is Very Low, but not absent. On 27 January 2023, Woodside emailed DoD with an update on the proposed activity (Appendix F, reference 1.55) and provided an updated Consultation Information Sheet. Woodside asked DoD for access to sufficient data or a map of Defence Restricted and Prohibited Areas to inform Woodside's development of defence zone maps and figures for DoD's use. On 20 February 2023, DoD responded thanking Woodside for its email and reiterated previous advice provided on 15 June 2021. DoD also provided Woodside with a figure outlining its restricted airspace and Defence Training Areas off the WA Coast. On 13 March 2023, Woodside emailed DoD and provided an updated defence zone map (Appendix F, reference 1.110). 	
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response
<p>DoD has provided feedback relating to:</p> <ul style="list-style-type: none"> The location of the activity in proximity to the NWXA and the potential presence of UXO. Notification requirements. <p>DoD has provided advice relating to:</p> <ul style="list-style-type: none"> Details of its restricted airspace and Defence Training Areas off the WA Coast. 	<p>Woodside has reviewed the proposed activity and the location of the NWXA and UXOs to understand the potential for UXOs to be within the Operational Area. The Learmonth Air Weapons Range (AWR) practice area is approximately 20 km south of the Operational Area and the location of any UXOs (known to occur) are near Bessieres Island which is located 190 km from the Operational Area. Based on the locations of the proposed activity and advice from DoD, UXO risk in the Operational Area is considered negligible / remote and it was determined there is no credible risk from UXOs for the proposed activity.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>
Summary of Feedback, Objection or Claim	Environment Plan Controls
	<p>Woodside has addressed DoDs expectations on notifications – Defence, restricted air space and AHO (C 1.1 and C 1.5, Table 7-2). AHO have been engaged for the activity and are included in Woodside's activity notification protocols. AHO will be notified four weeks prior to the start of activities.</p> <p>Woodside considers the measures and controls in the EP are appropriate.</p>

Department of Primary Industries and Regional Development (DPIRD)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 14 May 2021, Woodside emailed DPIRD (Appendix F, reference 1.24) advising of the proposed activity and provided a Consultation Information Sheet, fisheries map and list of previous seismic surveys.
- On 3 February 2023, Woodside emailed DPIRD with an update on the proposed activity (Appendix F, reference 1.67) and provided an updated Consultation Information Sheet and fisheries maps.
- On 17 February 2023, DPIRD responded noting that as the activity is proposed for waters unlikely to influence fishing activities it has no further comments at this time.
- On 24 February 2023, Woodside emailed DPIRD thanking it for its feedback and confirming that Woodside has consulted state commercial fishery licence holders and recreational fishery licence holders that are active within the EMBA for the proposed activity (Appendix F, reference 1.100).

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>DPIRD has provided feedback that the activity is proposed for waters unlikely to influence fishing activities and it has no further comments at this time.</p> <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside confirmed with DPIRD it has consulted state commercial fishery licence holders and recreational fishery licence holders that are active within the EMBA for the proposed activity. (See this Consultation Report with Commonwealth and State Fisheries.)</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>

Department of Transport (DoT)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 13 May 2021, Woodside emailed DoT advising of the proposed activity (Appendix F, reference 1.15) and provided a Consultation Information Sheet.
- On 18 May 2021, DoT emailed Woodside:
 - Requested that if there is a risk of a spill impacting State waters from the proposed activities, to ensure that DoT is consulted as outlined in the Department of Transport Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements (July 2020).
- On 8 August 2021, Woodside responded to DoT's feedback and confirmed that if there is a risk of a spill impacting State waters, the Department of Transport will be consulted.
- On 8 July 2021, Woodside emailed DoT and provided a copy of the First Strike Plan (Appendix F, reference 1.26).
- On 9 July 2021, DoT responded and advised it will review.
- On 11 August 2021, DoT responded with comments for review, which sought clarification on priorities, estimates of waste quantities and marine response options.
- On 12 August 2021, Woodside responded to DoT's feedback:
 - Providing feedback on responses priorities.
 - Provided feasible response thresholds.
 - Advised that this EP has a diesel-only scenario.
- On 19 August 2021, DoT emailed Woodside:
 - DoT advised it didn't have any further comments.
 - DoT requested a copy of the final version of the First Strike Plan once accepted.
- On 19 August 2021, Woodside responded and confirmed that it will send DoT a copy of the First Strike Plan once approved.
- On 27 January 2023, Woodside emailed DoT with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet.
- On 7 February 2023, DoT responded restating its advice from 18 May 2021.
- On 22 February 2023, Woodside responded confirming that if there is a risk of a spill impacting State waters, the Department of Transport will be consulted.

<p>Summary of Feedback, Objection or Claim</p> <p>DoT has provided feedback relating to:</p> <ul style="list-style-type: none"> • Consultation requirements in the event of a spill impacting State waters from any of the proposed activities. • The draft Oil Pollution First Strike Plan and a request for a final accepted version of the plan when available. <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed DoT's feedback regarding the Oil Pollution First Strike Plan and incorporated referenced changes based on feedback.</p> <p>Woodside will send DoT a copy of the First Strike Plan once accepted.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside will provide DoT with a copy of the accepted Oil Pollution First Strike Plan (Appendix 1), as referenced in the OSPRMA (Appendix D).</p> <p>Woodside will consult DoT if there is a spill impacting State waters from the proposed activity, as referenced in the OSPRMA (Appendix D).</p> <p>No additional measures or controls are required.</p>
<p>Commonwealth and WA State Government Departments or Agencies – Environment</p>		
<p>Director of National Parks (DNP)</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> • On 13 May 2021, Woodside emailed DNP advising of the proposed activity considering potential risks to Australian marine Parks (Appendix F, reference 1.13), and provided a Consultation Information Sheet. • On 5 July 2021, DNP responded, noting it has no claims or objections. • On 27 January 2023, Woodside emailed DNP with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. • On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.76). • On 24 February 2023, DNP emailed Woodside: <ul style="list-style-type: none"> - DNP noted they have no further comment or objections and claims on the proposed activity. DNP noted that comments on the proposed activity were previously provided to Woodside on 5 July 2021. - DNP requested clarification on the Operational Area (OA). • The Director of National Parks considers the OA to encompass operational activities such as line turns / repositioning, equipment maintenance, deployment and recovery, crew change and resupply. - These are offshore petroleum activities and Commonwealth environment regulatory matters and, as such, should be included in the EP so relevant risks are assessed and effective mitigation applied. • On 8 March 2023, Woodside emailed DNP (Appendix F, reference 1.107): <ul style="list-style-type: none"> - Woodside acknowledged the comments already provided by DNP previously on each of the relevant EPs and that DNP has no further comment or objections and claims. - Copies of DNP's previous responses have been received and have been addressed where relevant within each of the proposed EPs. - Woodside provided clarification that the Operational Area includes both the Active Source Area and a surrounding buffer for the purpose of vessel line turns and other vessel manoeuvres. The seismic source will not be discharged within this buffer. 		
<p>Summary of Feedback, Objection or Claim</p> <p>DNP provided feedback about the Operational Area and that it has no comment on the proposed activity.</p> <p>Whilst feedback has been received, there were no objections or claims.</p>		
<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed DNP's feedback and provided additional information on the operational area.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>		
<p>Environment Plan Controls</p> <p>The Environment Plan demonstrates that the proposed activities are outside the boundaries of a proclaimed Commonwealth Marine Park and identifies that there are no credible impacts to the values of any Commonwealth Marine Parks as a result of planned activities (Section 4.9). While impacts to Commonwealth Marine Parks are possible in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of an incident, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>Woodside will ensure DNP is made aware of any incidences within a marine park for the activity, as per the commitment in the Oil Pollution First Strike Plan (Appendix I; Table 7-4).</p> <p>No additional measures or controls are required.</p>		

<p>Department of Biodiversity, Conservation and Attractions (DBCA)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DBCA advising of the proposed activity and provided a Consultation Information Sheet (Appendix F, reference 1.17). On 24 May 2021, DBCA emailed Woodside: <ul style="list-style-type: none"> DBCA advised that based on the documentation provided for review and other readily available information, DBCA has no comments in relation to its responsibilities under the Conservation and Land Management Act 1984 and Biodiversity Conservation Act 2016. On 27 January 2023, Woodside emailed DBCA with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 8 February 2023, DBCA emailed Woodside: <ul style="list-style-type: none"> DBCA advised that based on the documentation provided for review and other readily available information, DBCA has no comments in relation to its responsibilities under the Conservation and Land Management Act 1984 and Biodiversity Conservation Act 2016. 		<p>Environment Plan Controls</p> <p>The Environment Plan demonstrates that the proposed activities are outside the boundaries of a proclaimed State Marine Park and identifies that there are no credible impacts to the values of any State Marine Parks as a result of planned activities (Section 4.9). While impacts to State Marine Parks are not expected in the event of an unplanned hydrocarbon spill, Woodside considers it adopts appropriate controls to prevent a hydrocarbon spill and controls to respond in the highly unlikely event of a hydrocarbon spill, as demonstrated in Section 6.7.2 and Section 6.7.3.</p> <p>No additional measures or controls are required.</p>	
Commonwealth and State Government Departments or Agencies – Industry			
<p>Department of Industry, Science and Resources (DISR) (formerly DISER)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DISR advising of the proposed activity (Appendix F, reference 1.12) and provided a consultation Information Sheet. On 27 January 2023, Woodside emailed DISR with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>	
<p>Department of Mines, Industry Regulation and Safety (DMIRS)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed DMIRS advising of the proposed activity (Appendix F, reference 1.14) and provided a Consultation Information Sheet. On 27 January 2023, Woodside emailed DMIRS with an update on the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 		<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>	
<p>Summary of Feedback, Objection or Claim</p> <p>DCBCA provided feedback that it has no comment on the proposed activity. Whilst feedback has been received, there were no objections or claims.</p>		<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside acknowledges that DBCA had no comment on the proposed activities. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>		<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>		<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	

Commonwealth Commercial fisheries and representative bodies

Western Deepwater Trawl Fishery

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 13 May 2021, Woodside emailed licence holders advising of the proposed activity and provided a Consultation Information Sheet and fisheries map (Appendix F, reference 1.18)
- On 3 February 2023, Woodside emailed licence holders with an update on the proposed activity (Appendix F, reference 1.65) and provided an updated Consultation Information Sheet and fisheries map.
- On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86).

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP</p> <p>No additional measures or controls are required.</p>
<p>North West Slope and Trawl Fishery</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 3 February 2023, Woodside emailed licence holders on the proposed activity (Appendix F, reference 1.65) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Commonwealth Fisheries Association (CFA)</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed the CFA advising of the proposed activity (Appendix F, reference 1.19) and provided a Consultation Information Sheet, fisheries map and list of previous seismic surveys. On 3 February 2023, Woodside emailed CFA on the proposed activity (Appendix F, reference 1.65) and provided an updated Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.86). On 22 February 2023, CFA emailed Woodside: <ul style="list-style-type: none"> CFA advised it is not resourced to give feedback on Woodside's Environment Plan. CFA requested to direct enquiries to the associations that represent the directly affected fisheries/fishers. CFA noted that the increasing volume of requests for consultation on EP from oil and gas and more recently windfarm proposals are beyond the capacity of most associations. For this reason, please be prepared to engage those associations on a fee for service basis. On 15 March 2023, Woodside emailed CFA: <ul style="list-style-type: none"> Woodside confirmed it has provided consultation information directly to fishery licence holders that it has assessed as 'relevant persons' for the proposed EP, as well as to their fishery representative bodies. As per Woodside's ongoing consultation approach, feedback continues to be assessed and responded to, as required, through the life of an EP. 		

<p>Summary of Feedback, Objection or Claim</p> <p>CFA provided feedback that it is not resourced to give feedback on Woodside's Environmental Plan and that it should consult with fishery licence holders directly. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed the CFA's feedback, including confirming it has provided consultation information directly to licence holders it has assessed as 'relevant persons' for the proposed EP as well as their fishery representative bodies. Woodside has provided consultation information to AFMA, DAFF - Fisheries, CFA, ASBTIA, Tuna Australia, WAFIC and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
<p>State Commercial fisheries and representative bodies</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside sent a letter to the Marine Aquarium Managed Fishery on the proposed activity (Appendix F, reference 1.66) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up letter (Appendix F, reference 1.82). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
<p>Mackerel Managed Fishery (Area 2 and 3)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside sent a letter to the Mackerel Managed Fishery (Area 2 and 3) on the proposed activity (Appendix F, reference 1.81) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up letter (Appendix F, reference 1.97). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
<p>West Coast Deep Sea Crustacean Managed Fishery</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside sent a letter to the West Coast Deep Sea Crustacean Managed Fishery on the proposed activity (Appendix F, reference 1.66) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up letter (Appendix F, reference 1.82). 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Pilbara Line Fishery</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 3 February 2023, Woodside emailed to the Pilbara Line Fishery on the proposed activity (Appendix F, reference 1.72) and provided a Consultation Information Sheet and fisheries map. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.81). 		
<p>Summary of Feedback, Objection or Claim</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to DPIRD, WAFIC, and individual relevant licence holders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP.</p> <p>Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7-2 and Control 1.3 in Section 6.6.1 of this EP.</p> <p>No additional measures or controls are required.</p>
<p>Western Australian Fishing Industry Council (WAFIC)</p>		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed WAFIC advising of the proposed activity (Appendix F, reference 1.20) and provided a Consultation Information Sheet, fisheries map and list of previous seismic surveys. On 16 June 2021, WAFIC thanked Woodside for the information. <ul style="list-style-type: none"> WAFIC noted the following risks: <ul style="list-style-type: none"> Mobile invertebrates – Moderate Immobile invertebrates – Low Finfish demersal – Moderate Pelagic – Negligible 		
<ul style="list-style-type: none"> WAFIC noted that commercial fishers have advised them that they are encountering a significant change in catchability of mackerel species following seismic survey activity so fish behaviour and distribution are changing which is having a direct impact on the economic viability of commercial fishers and potential fish stocks for those species. There is an opportunity for further research into this indirect impact to fully understand the effect. WAFIC also noted notwithstanding the above, risk mitigation and control measures should be implemented to ensure all impacts are managed and detailed evidence-based analysis has considered the timing of the survey to minimise impacts to commercial fishing operations and the ecological impacts to fish species. 		
<ul style="list-style-type: none"> On 23 August 2021, Woodside responded, thanking WAFIC for the feedback and confirmed the receptors outlined, and impact of seismic surveys will be considered in the EP, and control measures implemented where relevant. On 3 February 2023, Woodside emailed WAFIC on the proposed activity (Appendix F, reference 1.68) and provided an updated Consultation Information Sheet and fisheries map. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.78). On 5 May 2023, Woodside had a phone call with WAFIC to follow up on a number of EPs, including the activities proposed under this EP, and to request any further feedback. Woodside committed to providing WAFIC with a consolidated email outlining all the EPs Woodside is currently consulting WAFIC on for ease of feedback. On 5 May 2023, Woodside sent an email to WAFIC providing the status of feedback on a number of EPs, including the activities proposed under this EP. Woodside advised it would soon be submitting the EP for assessment and requested any further feedback. On 19 May 2023, Woodside had a phone call with WAFIC to follow up on a number of EPs, including the activities proposed under this EP and to request any feedback. 		

<p>Summary of Feedback, Objection or Claim</p> <p>WAFIC provided feedback about risks and communicated advice from commercial fisheries about changes to fish behaviour and distribution, particularly the catchability of mackerel species following seismic survey activity. WAFIC also commented on the implementation of risk mitigation and control measures to minimise impacts. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has addressed WAFIC's feedback and confirmed that the receptors outlined, and impact of seismic surveys will be considered in the EP, and control measures implemented where relevant including application of EPBC controls (Section 6). Woodside has provided consultation information to DPIRD, WAFIC and individual relevant licence holders. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has assessed the potential for interaction with Commonwealth and State managed commercial fisheries in Section 4.10.2 of this EP. Woodside will provide notifications to AFMA, CFA, DAFF (fisheries), WAFIC, DPIRD, Recfishwest, individual fishery licence holders and other oil and gas operators (if agreed during consultation) ten days before activity commences, and following completion of activities, as per Table 7.2 and Control 1.3 in Section 6.6.1 of this EP. No additional measures or controls are required.</p>
Recreational marine users and representative bodies		
<p>Exmouth Recreational Marine Users</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 3 February 2023, Woodside emailed Exmouth Recreational Marine Users on the proposed activity (Appendix F, reference 1.69) and provided a Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F Appendix F, reference 1.79). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Review process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Gascoyne Recreational Marine Users</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 6 February 2023, Woodside sent a letter to Gascoyne Recreational Marine Users on the proposed activity (Appendix F, reference 1.73) and provided a Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.83). 		
<p>Summary of Feedback, Objection or Claim</p> <p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>No additional measures or controls are required.</p>
<p>Recfishwest</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Recfishwest advising of the proposed activity (Appendix F, reference 1.56) and provided a Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.87). 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response Woodside has responded to and incorporated feedback from Recfishwest on other Scarborough EPs. Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	Environment Plan Controls	No additional measures or controls are required.
Marine Tourism Association WA			
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.			
Summary of information provided and record of consultation:			
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Marine Tourism Association WA advising of the proposed activity (Appendix F, reference 1.56) and provided a Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.87). 			
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	Environment Plan Controls	No additional measures or controls are required.
WA Game Fishing Association (WAGFA)			
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.			
Summary of information provided and record of consultation:			
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed WAGFA advising of the proposed activity (Appendix F, reference 1.56) and provided a Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.87). 			
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response Woodside has provided consultation information to Recfishwest, Marine Tourism Association of WA, WA Game Fishing Association and individual recreational marine users. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	Environment Plan Controls	No additional measures or controls are required.

Titleholders and Operators	
<p>Chevron Australia / Osaka Gas Gorgon, Tokyo Gas Gorgon, JERA Gorgon</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed Chevron Australia advising of the proposed activity (Appendix F, reference 1.16) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Chevron Australia advising of the proposed activity (Appendix F, reference 1.58) and provided an updated Consultation Information Sheet. Woodside requested that Chevron forward the consultation information to Chevron's Joint Venture partners Osaka Gas Gorgon, Tokyo Gas Gorgon and JERA Gorgon for feedback. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.88). On 22 March 2023, Chevron emailed Woodside: <ul style="list-style-type: none"> Chevron advised it was actively reviewing a list of 10 of Woodside's EP submissions. Chevron advised the current forecast is for the list to be completed by mid-April at the latest, although it has prioritised a list of five EPs to be completed sooner. Chevron requested for Woodside to advise if there is a particular EP that is of higher urgency so that it can prioritise its review accordingly. Once this initial backlog is clear Chevron anticipates being in a position to respond within 30 days. Chevron requested to assist in its review of the potential effect on its interests and activities, could Woodside please provide GIS shape files for the EPs listed (including this proposed activity). On 29 March 2023, Chevron emailed Woodside: <ul style="list-style-type: none"> Chevron advised it had reviewed five of Woodside's EPs that were submitted to Chevron and have captured initial feedback on each. In addition to the previously requested GIS shape files, Chevron requested for Woodside to confirm that the area of seismic data collection and operations have not changed since the Seismic Ingress Agreements executed in 2022. On 3 April 2023, Woodside emailed Chevron: <ul style="list-style-type: none"> Woodside provided GIS shapefiles for a list of 10 Woodside EPs, including this proposed activity. Woodside advised it would respond to Chevron's feedback dated 29 March 2023 separately. On 6 April 2023, Woodside emailed Chevron: <ul style="list-style-type: none"> Woodside re-attached the GIS shapefiles provided on 3 April 2023 and advised it has provided the requested shapefiles for the Scarborough Seismic activity on 3 April 2023. Woodside confirmed that the survey area as described in the EP and associated Ingress Agreement has not changed. The Agreement will expire in Oct 2023 however Woodside are currently planning to acquire seismic under the Scarborough EP in June 2023 – it is a three-month campaign. If this timeframe cannot be achieved, Woodside will engage Chevron to renegotiate the Ingress Agreement. 	
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response
<p>Chevron has requested:</p> <ul style="list-style-type: none"> GIS shapefiles for the proposed activity. Confirm that the area of seismic data collection and operations have not changed since the Seismic Ingress Agreements executed in 2022. 	<p>Woodside has provided GIS shapefiles to Chevron for the Scarborough Seismic activity. Woodside confirmed that the survey area as described in the EP and associated Ingress Agreement has not changed.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>
Environment Plan Controls	
<p>Section 6.7.6 of the EP was updated to include cumulative underwater noise impact assessment, should the Chevron 4D MSS be carried out at the same time as Scarborough Trunkline installation (within the 4D MSS Operational Area).</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on Chevron's functions, interests or activities.</p> <p>No additional measures or controls are required.</p>	
Exxon Mobil Australia	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed Exxon Mobil Australia advising of the proposed activity (Appendix F, reference 1.16) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Exxon Mobil Australia advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.89). 	
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).
Finder Energy	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Finder Energy advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 	

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
KUPEEC		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed KUPEEC advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Western Gas		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed Western Gas advising of the proposed activity (Appendix F, reference 1.16) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Western Gas advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Shell Australia		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 13 May 2021, Woodside emailed title holder advising of the proposed activity (Appendix F, reference 1.22) and provided a Consultation Information Sheet, and Titleholder map (Appendix F, reference 1.21). On 27 January 2023, Woodside emailed Shell Australia advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 7 February 2023, Shell emailed advising it has no comments on the proposed activity. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
Shell advised it has no feedback on the proposed activity. Whilst feedback has been received, there were no objections or claims.	Woodside notes Shell's advice that it has no feedback on the proposed activity. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Santos		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Santos advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.89). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.

Eni Australia	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Eni Australia advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). On 23 February 2023, Eni Australia emailed Woodside advising it has no comments and that it requested to remain updated on the proposed activity. On 23 February 2023, Woodside emailed Eni Australia to advise that it will provide commencement and cessation of activity notifications relating to the proposed activities (Appendix F, reference 1.99). 	
Summary of Feedback, Objection or Claim	Environment Plan Controls
<p>Woodside notes Eni Australia's feedback that it has no comment on the proposed activity. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has consulted Eni Australia in the course of preparing this EP. Woodside has assessed the claims or objections raised by Eni Australia. An additional measure was put in place- Woodside will notify Eni Australia prior to the commencement and at the end of the activity, as referenced as C1.3 in this EP. Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on Eni Australia's functions, interests or activities.</p>
OMV Australia / Sapura OMV Upstream (WA)	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed OMV Australia / Sapura OMV Upstream (WA) advising of the proposed activity (Appendix F, reference 1.57) and provided an updated Consultation Information Sheet. On 23 February 2023, Woodside sent a follow up email (Appendix F, reference 1.89). 	
Summary of Feedback, Objection or Claim	Environment Plan Controls
<p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
JX Nippon Oil & Gas Exploration Corporation	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed JX Nippon advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside emailed JX Nippon via its website to obtain more up to date contact details for providing the EP Consultation Information (Appendix F, reference 1.94). On 23 February 2023, Woodside also sent a letter to JX Nippon advising of the proposed activity (Appendix F, reference 1.97). Woodside also sent an email advising of the proposed activity (Appendix F, reference 1.98). On 24 February 2023, JX Nippon emailed Woodside seeking confirmation of the location and topic of the activity so as to obtain the correct contact to provide feedback. On 24 February 2023, Woodside emailed JX Nippon to advise on the location of the specific proposed activity and resent the consultation information. On 24 February 2023, JX Nippon emailed Woodside and copied in the appropriate contact for reviewing the consultation information. On 28 February 2023, Woodside emailed JX Nippon to advise it has updated its stakeholder distribution list. On 10 March 2023, Woodside followed up with JX Nippon via email (Appendix F, reference 1.109). 	
Summary of Feedback, Objection or Claim	Environment Plan Controls
<p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
BP Developments Australia (BP)	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed BP advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 	

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Carmarvon Energy		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Carmarvon Energy advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
PE Wheatstone (PEW)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed PEW advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Kyushu Electric Wheatstone (KEW)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed KEW advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Fugro Exploration		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> On 27 January 2023, Woodside emailed Fugro Exploration advising of the proposed activity (Appendix F, reference 1.59) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.94). 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.

INPEX Alpha		Environment Plan Controls	
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 27 January 2023, Woodside emailed INPEX Alpha advising of the proposed activity (Appendix F, reference 1.60) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.95). 			
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls	
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.	
Peak Industry Representative bodies			
APPEA			
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 13 May 2021, Woodside emailed APPEA advising of the proposed activity (Appendix F, reference 1.23) and provided a Consultation Information Sheet. On 27 January 2023, Woodside emailed APPEA advising of the proposed activity (Appendix F, reference 1.52) and provided an updated Consultation Information Sheet. On 22 February 2023, Woodside sent a follow up email (Appendix F, reference 1.76). 			
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls	
No feedback, objections or claims received despite follow up.	Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.	

Traditional Custodians

Ngarluma Aboriginal Corporation (NAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 20 January 2023, Woodside emailed NAC advising of the proposed activity (Appendix F, reference 1.42) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. Woodside made it clear it was prepared to consult in the manner and location preferred by NAC and resource the meeting appropriately. Woodside requested that the information be forwarded to NAC members as required.
- On 26 January 2023, Woodside and NAC representatives met to discuss the proposed activity in more detail.
- On 3 February 2023, Woodside and NAC representatives met in Roebourne to discuss how best to consult on the proposed activity.
- On 17 February 2023, Woodside spoke with NAC representatives to discuss the proposed activity and to plan further engagement on a range of Woodside EPs. NAC representatives stated there would be opportunity at the NAC March Board meeting for further engagement.
- On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity and following on from the 17 February 2023 meeting (Appendix F, reference 1.101). Woodside noted it was seeking NAC's feedback as soon as possible on the proposed activity. Woodside made it clear it was prepared to consult in the manner and location preferred by NAC and resource the meeting appropriately.
- On 24 February 2023, NAC emailed Woodside acknowledging receipt of Woodside's emails noting that it was yet to attend to the emails and would do so following the w/c 27 February 2023.
- On 9 March 2023, Woodside emailed NAC and also left a phone message to follow up on the email received 24 February 2023. Woodside advised it was seeking opportunity for Woodside to present to the NAC board with an EP overview and asked if there had been any progress in terms of securing a preferred day and timeslot.
- On 9 March 2023, NAC emailed Woodside to advise that the contact at NAC was unavailable to meet on 30 March 2023.
- On 9 March 2023, Woodside emailed NAC:
 - Woodside noted that during a previous meeting, NAC had advised its next board meeting would be held on 29 and 30 March 2023 and that Woodside would be potentially assigned time on the agenda to present to the NAC Board on either one of those days.
 - Woodside advised that this is an important opportunity to ensure that NAC board have the opportunity to provide feedback on the Environmental Plans and note if they have interests in the environment that may be affected (EIMBA).
 - Woodside welcomed the suggestion of alternative days/times or ways that it can provide an overview to the NAC Board.
- On 14 March 2023, NAC emailed Woodside to advise that its March Board Meeting was full with overflows from January and February and at this stage will need to leave the Environmental Plan consultation until the April meeting.
- On 14 March 2023, Woodside emailed NAC to request the dates for the April board meeting and to confirm what time Woodside might be allocated to present at NAC's earliest convenience.
- On 14 March 2023, NAC emailed Woodside to advise that the Board meeting is tentatively set for 29th April 2023. NAC advised this needs to be confirmed with its Board before it can commit to a time or date.
- On 17 April, Woodside emailed NAC noting there had been no confirmation of an April meeting and seeking advice on whether NAC have feedback in relation to the proposed activities. The email explained that Woodside's plan to submit the EP and was seeking pre-submission feedback, noting that feedback could be provided for the life of the EP. Woodside sought an email supporting the approach and also looked forward to meeting in future.
- On 20 April 2023, NAC emailed Woodside acknowledging receipt of the materials and asked questions of an unrelated EP.
- On 21 April 2023, NAC advised that there was no time for Woodside on the April agenda but time would be set aside for May, with a tentative date of 17 May 2023.
- On 21 April 2023, Woodside thanked NAC for their response.
- On 26 April 2023, Woodside emailed NAC with a response to queries raised by NAC in their 20 April email. Woodside re-sent Nganhurra RTM information sheet with updated information.
- On 28 April 2023 Woodside emailed NAC advising that the next step is for the EP to be submitted but no feedback has been received to date. Stated that before Woodside submits, Woodside seeks to understand whether there are any issues or concerns with the proposed activities that need to be reflected in the EP.
- On 10 May 2023, NAC replied to Woodside stating that they are supportive of submission of the EP and look forward to ongoing consultation.
- On 12 May 2023, NAC emailed Woodside to notify that Woodside had been allocated a one-hour window in the NAC Board Meeting of 17 May.
- On 17 May 2023, Woodside presented to the NAC Board of Directors in Karratha:
 - Woodside opened the meeting with introductions
 - Woodside thanked the Ngarluma Aboriginal Corporation (NAC) for inviting Woodside Energy to speak with them and provided Acknowledgement of Country
 - Woodside talked through agenda and reasons for consultation
 - Woodside introduced the regulations we need to comply with and the role of NOPSEMA. Explained that many of our activities could impact Ngarluma country in the highly unlikely event of an oil spill, and some activities like Scarborough could have a more direct impact
 - Woodside referred to an example EMBA and described how it is comprised of many replicates of a single spill
 - Woodside explained that we are consulting with many people up and down the coastline including multiple Aboriginal Corporations
 - Woodside proposed what consultation outcomes it would like to meet with NAC, including understanding
 - How the activities could impact cultural values, functions, interests or activities
 - Whether protecting the environment is enough to protect these things
 - What NAC's concerns are about the proposed activities and what NAC thinks we should do about it
 - If there's anything NAC would like included in EPs
 - Woodside noted that feedback will be welcomed throughout the life of all Environment Plans
 - Woodside provided a high-level overview of the Scarborough project
 - NAC asked when these activities are proposed to happen, Woodside responded later this year pending government approvals
 - Woodside asked if there was any further feedback or questions about these activities, none were received
 - Woodside described the proposed seismic activity
 - Woodside described the planned and unplanned environmental impacts and risks of the activities described in the meeting and proposed controls, in accordance with the Information Sheets

<ul style="list-style-type: none"> Woodside asked whether there are any questions on the environmental risks and impacts, none were received Woodside noted that any questions or considerations can be directed through Shamine, or the Quarterly Heritage Meetings which NAC has a standing invite to. This is also an opportunity to discuss job opportunities and other matters Woodside left hard copies of Information Sheets and Plain Language Summaries for each discussed activity with NAC attendees. <p><u>Quarterly Heritage Meetings:</u></p> <ul style="list-style-type: none"> Woodside convenes a quarterly meeting of Traditional Custodian representatives from the Representative Aboriginal Corporations involved in historical native title claims over the Burrup Peninsula, including NAC. Individual attendees are nominated by their representative Aboriginal Corporations. These meetings are summarised separately in this table. NAC did not nominate attendees to quarterly meetings in 2021 or the first half of 2022 but were provided with copies of the slides used which included overviews of the Scarborough Project. 	<p>Summary of Feedback, Objection or Claim</p> <p>NAC has not provided objections or claims in response to the information provided since consultation commenced in October 2022. NAC has confirmed receipt of materials on more than one occasion, and there has been ample opportunity for two-way dialogue. As of 10 May 2023, NAC stated they support the submission of the EP and look forward to ongoing consultation.</p> <p>During face-to-face engagement with the WAC board did not provide any objections, claims or feedback on the proposed activity.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Consultation with NAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.3.2.1).</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on NAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>
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Murujuga Aboriginal Corporation (MAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:**Historical Engagement**

- Woodside has been consulting with MAC on the Scarborough project area generally since 2018, including over the area for which this EP relates. Below is evidence of the ongoing consultation.
- 12 June 2018 - Meeting: Woodside provided a briefing on a number of projects including Scarborough.
- 11 September 2018 - Meeting: Woodside provided a briefing on Scarborough's approvals pathway, schedule and proposed engagement approach.
- 12 December 2018 - Meeting: Woodside provided a briefing on Scarborough's construction footprint and future engagement.
- On 25 August 2020, Woodside CEO and MAC Board met in person at the MAC office on Murujuga about a number of issues including high-level summary of Scarborough project. MAC members expressed a positive opinion of Woodside and a desire to work together in partnership to achieve future ambitions.
- On 2 October 2020, Woodside email MAC to request advice on progressing a Scarborough ethnographic survey, to be completed by MAC with a final report provided to Woodside
- On 5 October 2020, MAC called Woodside to discuss way forward with the proposed Scarborough ethnographic survey
- On 6 October 2020, Woodside emailed MAC to confirm arrangements and request an updated quote
- On 8 October 2020, Woodside finalised the requested scope of works for the ethnographic survey to identify heritage values known to exist in the nearshore or offshore footprints of the Scarborough project or surrounding seascape.
- From 20-22 October 2020 members of MAC's Circle of Elders participated in an on-country ethnographic survey with both male and female heritage consultants, consistent with industry standard practice. The heritage consultants were selected by MAC, including the Operational Area for this EP. This survey was undertaken at a landscape level. Due to the distance of the Operational Area from onshore and coastal areas where the participants are known to hold rights and interests it was not practical to limit the scope of this assessment to a defined boundary. Additionally, in areas of open water beyond the Ancient Landscape that would have been occupied by ancestral people, the relevant values are not expected to have clearly defined or discrete distributions. Therefore, participants were provided with a map of the Scarborough development and asked to identify any values in the surrounding landscape. Consistent with the understanding that cultural values cannot be extrapolated over long distances offshore beyond any native title claims, determinations or ILUAs, no cultural values were identified in the Operational Area or EMBA (McDonald and Phillips 2021). Recommendations of the report related to onshore, nearshore islands and the Ancient Landscape outside the Operational Area of this EP.
- On 10 March 2021, Woodside provided an overview of the Scarborough project to MAC's CEO. No feedback was received on the proposed activity.
- On 19 and 20 May 2021, Woodside provided an overview of the Scarborough project to MAC's Circle of Elders. No feedback was received on the proposed activity.
- On 22 June 2021, MAC provided a report (McDonald and Phillips 2021) on the ethnographic survey to Woodside. MAC has not consented to Woodside sharing this report. It contained the following recommendations:
 - That further ethnographic survey ("Phase II") is conducted
 - That bathymetric mapping and other information is provided to MAC
 - That MAC and Woodside continue to consult on heritage management
 - That an onshore heritage site, outside the Operational Area, be registered by MAC
 - The report did not identify any sites within the Operational Area or EMBA.
- On 7 July 2021, a meeting was held with a presentation and discussion about submerged heritage assessments completed to date and mitigations proposed.
- On 11 November 2021, MAC provided Woodside a presentation/position about intangible heritage values.
- On 15 December 2021, Woodside met with MAC Board and Circle of Elders to provide a project overview.
- On 9 January 2022, Woodside sent a letter to MAC clarifying roles, composition, funding and milestones around the Heritage Management Committee.
- On 2 February 2022, Woodside proposed to MAC the establishment of a Heritage Management Committee (HMC) whose role would be to consider the necessary mitigation measures required to address any new heritage information arising following certain milestones related to the Scarborough Project and advise Woodside where any additional mitigation measures are recommended and of any other actions MAC or Woodside should consider.
- On 25 February 2022, an all day meeting was held between MAC and Woodside on heritage management and on 28 February 2022 an email of action items from meeting held on 25 February was sent to MAC.
- On 18 May 2022, Woodside sent a letter to MAC requesting clarity from MAC on whether the Phase II ethnographic survey for Scarborough is still supported by MAC.
- On 15 June 2022, Woodside held a meeting with MAC to discuss the scope, purpose and composition of the Heritage Management Committee (HMC). MAC committed to providing feedback on the HMC in writing.
- On 28 June 2022, MAC provided a letter to Woodside reaffirming their commitment to carry out the Phase II survey.
 - Woodside remains committed to supporting MAC to conduct the Phase II works at the earliest date convenient to MAC and their preferred consultant but will also respect any decision by MAC not to proceed.
- Woodside believes it has taken all reasonable steps to progress this work and is committed to support this additional ethnographic survey work to be undertaken, subject to MAC undertaking the works.
- Available bathymetric and other geophysical data is depicted in UWA 2021 and was provided to MAC on 18 May 2021 after the survey but prior to receiving McDonald and Phillips 2021.
- On 20 September 2022, Woodside sent an email to MAC seeking permission to share ethnographic survey results with NOPSEMA.
- On 9 January 2023, Woodside sent a letter to MAC regarding the proposed Heritage Management Committee.

Ensuring Sufficient Information and Sufficient Time

- On 20 January 2023, Woodside emailed MAC advising of the proposed activity (Appendix F, reference 1.44) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. Woodside also outlined:
 - In preparation for this work, Woodside has undertaken an assessment to identify potential impacts and risks to the marine environment arising from both planned and unplanned activities. Mitigation and management measures have been developed for each of the risks identified and will be outlined in the Environmental Plan (EP).
 - Woodside is seeking to understand the nature of the interests that Murujuga Aboriginal Corporation (MAC) and its members may have in the 'Environment that May Be Affected' (EMBA) by this activity. The EMBA is the total area over which unplanned events could have environmental impacts, as set out in the Summary Information sheet that was attached.
 - Woodside advised that it understands that it will be attending the MAC board meeting on 24 January 2023 to discuss this and information relating to a separate Woodside activity.
 - Woodside advised it would be pleased to speak with MAC members in addition to the MAC Board / office holders.
- On 25 January 2023, Woodside presented to the MAC Board on the status of the proposed Seismic activity. The meeting included the following topics relating to the proposed activity and the broader Scarborough Project:
 - EMBA map explained and left with MAC for information
 - Plain English fact sheets provided (Appendix F, reference 1.41 and 1.40)
 - MAC reiterated role of Board v Circle of Elders in consultation processes.
 - Local content outcomes continue to be a priority for MAC and its members.
- On 20 February 2023, Woodside presented to the MAC CEO and consultant to discuss the project including the Seismic EP. The meeting focused on scope and results of an ethnographic survey conducted in 2020, in context of the proposed activity and the broader Scarborough Project.
- On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity and following on from the 20 February 2023 meeting. Woodside noted it is seeking MAC's feedback as soon as possible on the proposed activity.
- On 7 March 2023, Woodside spoke with MAC to follow up on the material provided and sought meetings with the Board and Circle of Elders if required.
- On 30 March 2023, Woodside spoke with MAC and followed up on the material provided.
- On 3 April 2023, MAC emailed Woodside asking for a list of outstanding issues that Woodside would like to progress
- On 5 April 2023, Woodside responded to MAC via email with a list of open topics, which included the request for feedback on the proposed activity. Woodside requested advice from MAC on:
 - How the activity could impact cultural values
 - If MAC proposes anything to be included in the EP prior to submission
 - If MAC would like a meeting to discuss the activity
 - Whether MAC does not intend to provide advice prior to EP submission.
- On 12 April 2023, Woodside spoke with MAC regarding a number of topics including feedback on the proposed activity. MAC responded that their Board of Directors are meeting soon and that Woodside can expect a forward plan on EP consultation. Ongoing Relationship Building
- As of 15 May 2023, Woodside was still awaiting feedback from MAC.
- Woodside will continue to pursue an ongoing two-way relationship with MAC focused on future opportunities to work together.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>MAC have provided significant valuable input into the management of known and potential heritage values in the broader Scarborough Project footprint.</p> <p>As a result of consultation with MAC, three areas of concern have been raised:</p> <ul style="list-style-type: none"> This EP does not account for indirect impacts as a result of the broader Scarborough Project (e.g. potential impacts to Murujuga from onshore emissions associated with processing Scarborough gas) Uncertainty over the results of further ethnographic surveys, as new heritage values identified may require further mitigations Additionally, MAC's input has helped shape the structure and operation of the HMC described in 7.5 including their advice: That recommendations of the HMC need not be unanimous, That the HMC include MAC staff in addition to MAC Board, executive and Circle of Elders, and That developments in regards to the World Heritage listing of the Murujuga Cultural Landscape not trigger any meeting of the HMC. 	<p>MAC have provided significant valuable input into the management of known and potential heritage values in the broader Scarborough Project footprint.</p> <p>Woodside assessed MAC's points as follows:</p> <ul style="list-style-type: none"> The purpose of the Petroleum Activities program is to undertake a seismic survey. The Scarborough EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program, having regard to the nature and scale of the proposed Petroleum Activities Program. The extraction of Scarborough gas for onshore processing is not included in the Petroleum Activities Program for this EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of this Petroleum Activities Program but will be evaluated in future Scarborough EPs as appropriate. The completed ethnographic surveys, which align with industry practice, have not identified any heritage risks. Woodside remains committed to the further ethnographic surveys planned for the Scarborough project which go beyond industry standards, and is ready to progress these at MAC's earliest availability. The results of these surveys will be addressed through the Heritage Management Committee described in Section 7.5. <p>Woodside has agreed to the matters advised by MAC regarding the HMC with regards to the requirement for unanimous recommendations, membership of the HMC and the appropriate triggers for HMC meetings.</p> <p>Woodside will continue to consult with MAC on all relevant aspects of this EP prior to and during the execution of activities.</p> <p>Woodside continues to engage with MAC on the Scarborough project generally, and has committed to ongoing engagement with MAC Board and Elders.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside recognises that whales and other species of totemic importance need to be protected, including their populations and migration patterns (Section 4.9.1.5). As assessed in Section 6, Woodside considers that when the impacts and risks to marine species, including potential totemic species, have been reduced to ALARP and an acceptable level in offshore areas, the potential impacts and risks to cultural values associated with coastal indigenous connection with, or traditional uses of marine species and associated ecosystems in nearshore coastal waters are also reduced to ALARP and an acceptable level.</p> <p>Woodside and MAC have established the HMC. Recommendations of the HMC will be implemented where they (independently or in conjunction with other actions) lower the risk of impacts to heritage to ALARP. New heritage information, where applicable to this proposed activity, will be addressed as part of ongoing consultation (Table 7.8).</p> <p>Woodside has consulted MAC in the course of preparing this EP. Woodside has assessed the claims or objections raised by MAC. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on MAC's functions, interests or activities.</p>

Wirrawandi Aboriginal Corporation (WAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 20 January 2023 Woodside emailed WAC advising of the proposed activity (Appendix F, reference 1.46) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website), as well as a summary overview fact sheet. The email requested information on the interests that WAC and its members may have within the EMBA, information on how WAC would like to engage, and requested that WAC provide information to members as required.
- On 27 January 2023 Woodside placed a phone call and emailed WAC to follow up on the information provided (Appendix F, reference 1.61).
 - Woodside noted the upcoming opportunity to meet with WAC on 21 February while it was in Karratha and would send a proposed time to meet to discuss the information Woodside has provided on a number of Woodside activities and EMBA's, including this proposed activity.
 - Woodside requested it would like to gain an understanding on best way to progress if the WAC Board wish to have further discussions in relation to this information and also on how they prefer Woodside to engage for any future information shares.
- On 21 February 2023, Woodside spoke with WAC to discuss the proposed activity and plan a consultation meeting.
- On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity and following on from the 21 February 2023 meeting (Appendix F, reference 1.102). Woodside noted it is seeking WAC's feedback as soon as possible on the proposed activity.
 - Woodside also requested confirmation of the opportunity to meet with the WAC Board when they are next due to meet in Perth in March.
 - Further details and associated costs will be discussed once the meeting has been confirmed, in discussion with Woodside.
- On 24 February 2023 WAC emailed Woodside:
 - WAC acknowledged receiving the EP information and the meeting with proposed for the Elders and Directors in March, but that the meeting is still yet to be finalised.
 - Further details and associated costs will be discussed once the meeting has been confirmed, in discussion with Woodside.
- On 7 March 2023, WAC emailed Woodside to advise a draft agenda has been set and Woodside has been allotted Thursday 23 March 2023 for presentation.
- On 7 March 2023, Woodside emailed WAC welcoming this opportunity and advised it was looking forward to receiving further information in relation to timing and location.
- On 8 March 2023, WAC agreed by phone to meet with Woodside and a full meeting of the Board and Elders on 23 March 2023 in Perth.
- On 8 March 2023, Woodside phoned WAC and agreed to proceed with the meeting.
- On 9 March 2023, Robe River Kuruma Aboriginal Corporation (RRKAC) emailed Woodside (and copied in the CEO of WAC) and advising it has discussed the proposed activity with the Robe River Kuruma Heritage Advisory Committee and they have recommended that the interests of Robe River Kuruma people are best served through the joint Heritage Advisory Committee that is required under Yaburara Marthudhunera and Kuruma Marthudhunera Indigenous Land Use Agreement.
- RRKAC also suggested that WAC is required to facilitate this Committee and noted there is an emerging need to deal with other proponent matters, so there is an opportunity to link the engagement from a meeting efficiency perspective. Since the separate meeting with WAC had already been arranged, Woodside decided to proceed with both meetings.
- On 15 March 2023, Woodside emailed WAC to follow up on details relating to the meeting of the Board and Elders on 23 March 2023 in Perth.
- On 15 March 2023, WAC emailed Woodside:
 - WAC advised the 23 March 2023 meeting has been scheduled and arranged.
 - WAC advised that as discussed previously the intention is to present to WAC Directors and Elders on information requires WAC feedback.
- Woodside has continued to engage WAC on the proposed activity and in relation to presenting at the upcoming Board and Elders meeting.
- On 16 March 2023, WAC emailed Woodside to confirm conference room booking and querying numbers for meeting of 31 March 2023.
- On 17 March 2023, Woodside emailed WAC:
 - Woodside advised it was looking forward to connect and will ensure relevant representation to provide the suite of EP information overviews and will cover the broader community activity for awareness as requested.
- On 17 March 2023, Woodside emailed WAC re Joint Heritage Advisory Group, confirming numbers at meeting from Woodside (copied to RRRKAC).
- On 23 March 2023, Woodside presented to a meeting of the WAC Board and Elders in Perth:
 - Woodside described the Environment Plan framework, referring to the Offshore Petroleum and Greenhouse Gas Storage Act (Environment) Regulations, NOPSEMA's role as regulator and general contents of Environment Plans.
 - Woodside encouraged WAC to raise anything which they feel is missing in the information provided during the meeting, or any issues or concerns.
 - Woodside displayed a map of activities open for feedback to be discussed in the meeting and provided a list of other upcoming activities which will be open for consultation in 2023.
 - Woodside provided an overview of the broader Scarborough Project and overview of activities, including the process of the seismic survey, that a vessel will send sound through the seabed which will be reflected back and measured to help understand the reservoir.
 - WAC asked a number of questions relevant to the broader Scarborough Project
 - In relation to the seismic survey, WAC asked about potential impact of noise on whale communication.
 - Woodside responded that this is a key potential impact, and that controls have been put in place to try to avoid it.
 - Woodside stated that the seismic survey will generate some impulsive noise which has been modelled and controlled
 - Woodside described planned and unplanned environmental risks and impacts in accordance with tables provided in the Information Sheets for the activities, emphasising that unplanned risks are not expected to occur and are unlikely.
 - The EMBA for each proposed Scarborough activity was displayed, and the individual worst case loss of containment scenarios identified, noting that they are all diesel fuel releases which would only be caused by vessel collisions.
 - WAC asked how the EMBA influences consultation, Woodside responded that the EMBA has always been understood but it is now being used to identify people who may have an interest in the activity
 - WAC noted this concluded the Scarborough section of the meeting, and called for any further questions or feedback. None were received.
 - WAC stated that this kind of information sharing is important, and that Woodside's time is appreciated. WAC asked whether this type of information is broadly available to the community, Woodside responded that there are a number of open community sessions available in the region where it could be discussed

<ul style="list-style-type: none"> - WAC indicated that since they are engaging with a number of energy industry operators they will consider the information provided and discuss internally before any further response. - Woodside provided personal contact details for further feedback - Woodside provided NOPSEMA contact details, should WAC desire to provide feedback directly to the regulator. • On 3 May 2023, Woodside emailed a letter to WAC as a follow up to the 23 March meeting held in Perth with WAC Directors and Elders - Woodside thanked WAC for the careful consideration of matters - Acknowledge the WAC have interests in the EMBA - Woodside provided a response on matters raised at the meeting by WAC • On 3 May 2023, Woodside emailed a letter to WAC regarding the meeting with the joint Robe River Kuruma and Wirrawandi Joint Heritage Advisory Committee (JHAC) on 31 March: - Woodside thanked the HAC for the meeting, their careful consideration of the matters and feedback provided - Woodside acknowledged that the RRKAC have interests in the EMBA and noted that we want to ensure impacts are as minimal as reasonably practicable - A high level overview of presented topics was provided - Woodside provided responses to questions noted from the meeting that were not related to the proposed activity. Woodside notified that the feedback and the letter will be included in Environment Plans that will be submitted to NOPSEMA. <p><u>Quarterly Heritage Meetings:</u></p> <ul style="list-style-type: none"> • Woodside convenes a quarterly meeting of Traditional Custodian representatives from the Representative Aboriginal Corporations involved in historical native title claims over the Burrup Peninsula, including WAC. Individual attendees are nominated by their representative Aboriginal Corporations. These meetings are summarised separately in this table. • Copies of slides are made available to representative Aboriginal Corporations for the general awareness of members who were not able to attend individual meetings. 	<p style="text-align: center;">Environment Plan Controls</p> <p>Woodside considers the measures and controls in the EP address the potential impact from the proposed activities on WAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional measures or controls are required.</p>
<p>Summary of Feedback, Objection or Claim</p> <p>During face-to-face engagement with the WAC board and directors and circle of elders, WAC requested further information on topics related to this proposed activity which was responded to during the meeting:</p> <ul style="list-style-type: none"> • Potential impact of noise on whale communication • Emergency preparedness • The relevance of the EMBA to consultation • WAC expressed a desire for ongoing engagement and partnership. • WAC raised feedback and request for further information on the Scarborough project more broadly which will be provided as part of ongoing engagement. <p>Response</p> <p>Woodside has continued to engage WAC on the proposed activity. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>WAC as had a reasonable opportunity to participate in consultation.</p> <p>Consultation with WAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside has continued to engage WAC on the proposed activity. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>WAC as had a reasonable opportunity to participate in consultation.</p> <p>Consultation with WAC has not identified any other groups or individuals relevant to communally held functions, activities or interests.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>

Yinggarda Aboriginal Corporation (YAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- YMAC is the Native Title Representative Body (NTRB) for the Yamatji and Pilbara regions. NTRBs exist to provide assistance to native title claimants and holders in regards to their native title rights. No native title has been recognised over the Project Area, however YMAC is identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks.
- On 7 July 2022, Woodside met with YMAC to request advice on the appropriate cultural authorities for the Scarborough project area, including but not limited to the scope of this EP and nearby marine parks.
 - Woodside described the Scarborough Project and its footprint and gave an overview of indigenous parties consulted.
 - Woodside noted that YMAC was identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks. Woodside sought to understand if the cultural values of the nearby Gascoyne Marine Park may extend into the offshore Scarborough project areas.
 - Woodside requested advice on how best (in addition to work completed) to identify any cultural values in the Marine Parks and in the broader project footprint.
 - YMAC requested Woodside provide the relevant detailed information relating to the location and extent of the project.
 - On 19 July 2022, YMAC responded to Woodside and stated the area Woodside has identified requires correspondence directed to Murujuga Aboriginal Corporation (MAC) and Ngarluma Aboriginal Corporation (NAC). No reference was made at that stage about consulting with YAC.
 - On 20 January 2023 Woodside emailed YAC via the representative body Yamatji Marpa Aboriginal Corporation (YMAC) advising of the proposed activity (Appendix F, reference 1.47) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. The email requested information on the interests that YAC and its members may have within the EMBA, information on how YAC would like to engage, and requested that YAC provide information to members as required.
 - On 22 January 2023 YAC/YMAC emailed Woodside to advise it would make contact with Woodside once the consultation material had been reviewed.
 - On 6 February 2023, Woodside called YAC/YMAC to follow up. YAC/YMAC said they would send an email that day inviting Woodside to meet with the group.
 - On 22 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity (Appendix F, reference 1.80). Woodside noted it is seeking YAC's feedback as soon as possible on the proposed activity. Woodside stated that it would be grateful to meet with YAC at the earliest convenience at location of YAC's preference, providing budget and resources.
 - On 24 February 2023 Woodside followed up with YAC/YMAC via phone call. YAC/YMAC advised it would send an email on 24 February to discuss an invitation for Woodside to meet with YAC.
 - On 20 March 2023, Woodside emailed YMAC to follow up the discussed invitation for a face-to-face meeting with its Board of Directors and offered a phone discussion if YAC had any questions on the activities in the meantime
 - On 23 March 2023, YMAC responded and proposed a meeting on 3 May 2023 in Carnarvon and provided an estimated of its proposed costs. The invitation was accepted and arrangements made for a pre-meeting with YMAC to coordinate details.
 - On 23 March 2023, Woodside emailed YAC via YMAC to confirm face to face meeting and request budget.
 - On 24 March the YMAC lawyer emailed to arrange a pre-meet conversation on 31 April.
 - On 24 March Woodside emailed to confirm the pre-meet conversation.
 - On 27 March email from YAC via YMAX confirming pre-meet conversation.
 - On 30 March, the YMAC lawyer emailed to cancel the pre-meet conversation
 - On 27 April, Woodside emailed the YMAC lawyer to confirm timing and location for the face-to-face meeting on 3 May but the email bounced back requesting correspondence be forwarded to an alternate contact in YMAC
 - On 27 April, Woodside forwarded the email seeking to confirm time and location for the planned meeting to the alternate contact in YMAC
 - On 27 April, YMAC confirmed by email and phone call that they no longer represented Yinggarda Aboriginal Corporation and that the meeting on 3 May had been cancelled. Gumula Aboriginal Corporation is now representing YAC and YMAC is in the process of hand over, including correspondence with Woodside
 - On 27 April, Woodside acknowledged YMAC email re Gumula Aboriginal Corporation transition to new service provider.
 - On 28 April, Woodside attempted to call Gumula Aboriginal Corporation and left a voicemail to establish connection
 - On 28 April, Woodside emailed Gumula Aboriginal Corporation to establish contact and inform them of the prior context. Woodside stated that it is still interested in meeting with the YAC board if they are interested.
 - On 8 May, Woodside phoned Gumula Aboriginal Corporation to follow up the email, explaining that it is seeking to consult Yinggarda on the proposed activity and how the meeting had been cancelled. Gumula Aboriginal Corporation indicated that the email address previously contacted was correct and indicated that it would call back. No return call was received.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>In consultation in the course of preparing the EP since January 2023, YAC has not provided feedback, objections or claims in response to the information provided. YAC invited Woodside to discuss the proposed activity with its Board of Directors, which has since been cancelled due to change of support services.</p>	<p>Woodside demonstrated reasonable effort to engage in two way dialogue. YAC has had a reasonable opportunity to participate in consultation. Consultation with YAC has not identified any other groups or individuals relevant to communally held functions, activities or interests. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>As no response was provided by YAC, Woodside is not in a position to assess the merits of any objection or claim about the adverse impact of the Petroleum Activities Program or to provide a response. As identified in Section 7.9.2.1 of this EP, Woodside will continue to consult YAC following acceptance of the EP, as required by the implementation strategy and set out in Regulation 14(9) of the Environment Regulations.</p>

<p>Yindjibarndi Aboriginal Corporation</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 20 January 2023, Woodside emailed Yindjibarndi advising of the proposed activity (Appendix F, reference 1.48) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website), as well as a summary overview fact sheet. The email requested information on the interests that Yindjibarndi and its members may have within the EMBA, information on how Yindjibarndi would like to engage, and requested that Yindjibarndi provide information to members as required. On 24 February 2023, Woodside sent a follow up email on a range of Woodside EPs, including the proposed activity (Appendix F, reference 1.103). On 26 February 2023, Yindjibarndi emailed Woodside. Yindjibarndi advised that it will not be providing any comment on the proposed activity and noted it respected the traditional owners whose land and sea lies adjacent to, and within the precinct of, the projects, and will leave any comment and advice to be provided by them. On 28 February 2023, Woodside emailed Yindjibarndi to thank them and noted the response. 		
<p>Summary of Feedback, Objection or Claim</p> <p>Yindjibarndi has provided a response and advised that it will not be providing any comment on the proposed activity. Yindjibarndi expressed that they would prefer that traditional owner groups with land and sea adjacent to and within the precinct of the projects provide comment.</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Yindjibarndi Aboriginal Corporation has informed Woodside that it does not intend to provide feedback. Woodside agrees with Yindjibarndi's position that traditional owners whose land and sea are adjacent to or within the precinct of the projects should be able to provide comment. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on YAC's functions, interests or activities. Based on the engagement to date, no additional controls have been identified.</p>

Buurabayji Thalanyji Aboriginal Corporation (BTAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:**Historical Engagement**

- Prior to sending out the Consultation Information Sheets, Woodside spoke to BTAC on 4 January 2023 to discuss the best way forward to consult with BTAC. On 10 January 2023, Woodside emailed BTAC stating it would be very grateful for the opportunity to meet with BTAC in the second half of February as discussed, or sooner if possible. Woodside also offered to cover the reasonable costs of consultations. Specifically, in relation to this EP, Woodside stated they would like to discuss:
 - BTAC's expectations for consultation - how can Woodside and BTAC best work together.
 - BTAC's aspirations and plans - how can Woodside support BTAC regarding potential employment and contracting opportunities.
 - Environmental planning consultations about Woodside's Scarborough Project with gas fields planned to be located offshore, approximately 380km northwest of Karratha.
 - In addition:
 - Woodside advised it would like to and is required to consult with BTAC about the nature of any interests BTAC have in the "environment that may be affected" (EMBA) by this work, and any concerns BTAC may have about potential environmental impacts, so these concerns can be addressed through the environmental planning and approvals process.
 - Woodside provided further information about government guidelines for these consultations and provided a link to <https://consultation.norsema.gov.au/environment-division/consultation-guideline/>.
 - Woodside advised it would reach out in the next week with consultation information sheets.
 - Woodside stated in the 10 January 2023 email that it would like to arrange a meeting between senior Woodside staff and BTAC's Board if BTAC felt that was appropriate and it would await guidance from BTAC.

Ensuring Sufficient Information and Sufficient Time

- On 20 January 2023, Woodside emailed BTAC advising of the proposed activity (Appendix F, reference 1.50) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. The email requested information on the interests that BTAC and its members may have within the EMBA, information on how BTAC would like to engage, and requested that BTAC provide information to members as required.
- On 23 January 2023, Woodside emailed BTAC with the consultation information noting it had previously sent an email to an incorrect email address (Appendix F, reference 1.51).
- On 24 January 2023, BTAC emailed Woodside acknowledging it had received the information.
- On 27 January 2023, Woodside placed a phone call and emailed BTAC to follow up on the information provided (Appendix F, reference 1.62 and 1.63).
- On 20 February 2023, BTAC provided a letter to Woodside in relation to consultation on the broader Scarborough activities, including this proposed activity:
 - BTAC referred to the advertisements placed by Woodside regarding the proposed activity which sought feedback from persons or organisations who may hold interests in the EMBA by the activities.
 - BTAC confirmed that BTAC on behalf of Thalanyji people has interests and that the Thalanyji people have an enduring deep connection to sea country
 - BTAC advised it was seeking the opportunity to engage with Woodside and NORSEMA on the activity.
 - BTAC advised it seeks support from Woodside to enable BTAC to define and articulate its values on Sea Country in a manner that could be more clearly understood by the offshore sector, government, and the community. This would enable BTAC and Woodside to collaborate to develop effective management plans that can provide adequate protection to sea country values.
 - BTAC advised the information in the consultation fact sheets is very general. BTAC seeks support from Woodside to obtain technical support to review the information and provide BTAC and its members with feedback on the project risks to Sea Country and help BTAC contemplate the potential management controls that could be developed to protect its values and interests.
 - BTAC requested that emergency response capability is developed and locally provided to be able to respond to potential activities/actions that may cause an impact in the EMBA. BTAC encouraged Woodside and industry to build capacity and capability in BTAC's ranger program so that it could participate in response planning and management activities.
 - BTAC noted that ongoing consultation with BTAC will be imperative and likely continuous given recent changes to consultation requirements and this will continue to be a burden on the organisation. BTAC requested that Woodside enter into a consultation or engagement framework to ensure BTAC can be properly resourced financially and intellectually to participate in the consultation and management planning processes for the activities.
- On 22 February 2023, Woodside emailed BTAC:
 - Woodside thanked BTAC for its 20 February 2023 correspondence regarding consultations about the Scarborough project.
 - Woodside advised it will respond to this correspondence in the coming days and would be most grateful for the opportunity to meet with BTAC to discuss the matters raised in its letter and Woodside's relationship more broadly.
- On 13 March 2023, Woodside contacted BTAC via phone to discuss the correspondence on 20 February 2023.
- On 17 March 2023, Woodside emailed a letter to BTAC:
 - Woodside thanked BTAC for its feedback and it looks forward to working with BTAC.
 - Woodside advised it acknowledges and respects that BTAC on behalf of the Thalanyji People (Thalanyji) has interests in the EMBA by the Scarborough Activities and wants to ensure these values and interests are protected.
 - Woodside advised it also acknowledges that through BTAC's correspondence, BTAC has proposed several important risk mitigation and management measures.
 - Woodside agreed that the principles BTAC have outlined are important. To paraphrase, these principles are that:
 - Woodside and BTAC work in a structured way and on an ongoing basis to learn about, articulate and understand each other's values, aspirations and work, particularly to ensure BTAC understands how Woodside's activities may impact on Thalanyji values and interests.
 - Arising from this consultation, Woodside and BTAC will continue to identify environmental risks and design and implement monitoring and management responses to these risks on an ongoing basis. This includes building on Woodside's knowledge base to understand Thalanyji values and interests. Woodside understands this work will also improve BTAC's capability and capacity to identify risks and address monitoring and management arrangements, including through BTAC's ranger program.
 - BTAC has requested that Woodside provides BTAC with the resources that are necessary to undertake this work, including through the provision of information and Woodside personnel to provide briefings, and independent expert anthropological and environmental management advice to BTAC.

- Woodside advised that in response to the provision of independent expert environmental management advice to BTAC, Woodside would be pleased to provide the resources necessary for BTAC to obtain and retain this advice on the basis that such advice is provided by an experienced and reputable oil and gas environmental management expert who is independent of Woodside, and who has the capacity to undertake this work to meet consultation schedules.
 - Woodside suggested a range of organisations for BTAC's consideration who are not working for Woodside.
 - Woodside also advised it would also be pleased to support BTAC to acquire anthropological advice.
 - Woodside advised that it respects that BTAC has assessed the likelihood of unplanned events and impacts as possible, Woodside has assessed the likelihood of a major unplanned hydrocarbon release event as highly unlikely. By way of example the Scarborough Activities EMBA's are premised on an unmitigated diesel spill arising from the collision of large vessels, the piercing of fuel tank(s) from that collision causing all the fuel tank to leak out, and no control measures being enacted. Woodside has been operating for over 35 years and has never caused an unplanned event like this, however Woodside must plan for and consult about such events
 - Woodside advised that Woodside's target is to ship the first cargo of LNG from the Scarborough project in 2026, and to enable that:
 - Drilling and completions work is planned to occur anytime within a five-year window commencing in the second half of 2023, pending approvals.
 - Seabed installation and trunkline installation activities in Commonwealth waters are expected to commence in around late 2023, pending approvals.
 - Subsea infrastructure installation activities are planned to commence in the second half of 2023, pending approvals, with activities occurring in multiple campaigns and estimated to be completed within about 18 months.
 - Seismic activities are planned to start in the first half of 2023, pending approvals, and will take place over a period of between 55 and 70 days.
 - Links to relevant consultation information sheets to the above activities were also provided to BTAC for the second time (first sent on 23 January).
 - Woodside noted that considering the above schedule, there is time for BTAC and Woodside to work together in the short, medium and longer term to identify, develop and refine management responses to environmental risk.
 - Woodside advised that with reference to the timeframes as described above, environmental protection and management associated with these activities is subject to an adaptive management approach. This means that consultation between Woodside and BTAC about environmental risk and management responses is ongoing, and changes can be made to improve environmental protection and management practices over time, including in the associated Environment Plans (EPs).
 - Woodside proposed the following next steps:
 - Woodside formalises the matters outlined in its correspondence by including in each of the Environment Plans statements along the following lines:
 - BTAC for and on behalf of Thalanjiji has interests and values in the EMBA's and is concerned about the possible impact on these interests and values, including to Sea Country, arising from Woodside's proposed activities.
 - BTAC, with support from Woodside and through the provision of independent expertise, will on an ongoing basis:
 - convey to Woodside the nature of Thalanjiji interests and values, noting that BTAC would like to conduct work to articulate those values in a manner that Woodside understands.
 - provide information to Woodside about how those interests and values intersect with the EMBA's and how that should be managed.
 - Woodside will engage in ongoing consultation with BTAC for the purposes of ongoing monitoring, management and emergency response associated with environmental risk.
 - Woodside and BTAC will work under an adaptive management approach as the understanding of each other's values and interests, activities, needs and aspirations grow during the course of ongoing consultation. This means that Woodside's Environment Plans may be updated from time to time so they accurately reflect environmental risk as they relate to BTAC's interests and values, and the management measures that Woodside and BTAC will put in place to avoid and otherwise mitigate and manage environmental risk.
 - BTAC can at any time can make direct representations to the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) about the nature of BTAC's interests and how they may be affected by Woodside's activities.
 - Woodside proposed if BTAC considers it appropriate, that the principles discussed in its correspondence (this 17 March 2023 letter and BTAC's correspondence of 20 February 2023) apply to the various decommissioning and drilling EPs that Woodside has notified BTAC about. This will ensure these arrangements are formalised into regulatory processes and documentation. As per Woodside's ongoing consultation approach, feedback continues to be assessed through the life of the EPs.
 - Woodside advised BTAC that its letter of 20 February 2023 and this response will be included in the EP. Woodside requested that if their feedback is sensitive, please inform Woodside, and it will make this known to NOPSEMA upon submission of the Environment Plans to ensure this information remains confidential to NOPSEMA.
 - On 30 March 2023, Woodside spoke with BTAC to follow up on correspondence described above. BTAC indicated that they desire a consultation agreement and intend to provide correspondence accordingly.
 - On 17 April 2023, Woodside spoke with BTAC by telephone. The BTAC representative stated that they were aware that there were archaeological sites identified on nearshore islands and a cultural obligation to care for the environmental values of sea country. The BTAC representative stated there was in principle agreement to submission of current EPs while continuing to negotiate the collaboration agreement for support for rangers and support for recording of cultural values.
 - On 18 April 2023, BTAC emailed a response regarding Woodside's Scarborough activities.
 - BTAC agreed that subject to formalising arrangements, BTAC agrees in principle for Woodside to include the statements described in our letter dated 17 March
 - BTAC proposed that a Collaboration Agreement would be an appropriate mechanism to provide ongoing feedback to Woodside regarding its activities
 - BTAC invited Woodside to a board meeting to discuss Scarborough activities and other short, medium and longer term activities, discuss BTAC's strategic plan and details of a collaboration agreement
 - On 19 April, Woodside emailed to accept an invitation from BTAC to attend their forthcoming board meeting and requesting half a day of the board's time, preferably before the first week of May.
 - On 28 April 2023, Woodside emailed BTAC to follow up in relation to BTAC's proposed collaboration agreement and confirmed Woodside's intention to submit this EP on the understanding that BTAC is agreeable to this course of action, on the basis that we will progress the collaboration agreement. Woodside asked BTAC to identify if it had misinterpreted BTAC's position.
 - On 4 May 2023, Woodside called BTAC. It was discussed that:
 - Woodside would be sending BTAC more EPs (for other activities) for consultation
 - Woodside is working on draft key terms/principles for the collaboration agreement for BTAC's consideration
 - A meeting between Woodside and the BTAC board may be possible in June
 - Woodside intended to submit the Scarborough EPs (including this proposed activity) soon
 - On 4 May 2023, BTAC emailed Woodside to continue discussion regarding a potential future meeting between Woodside and the BTAC board to discuss activities on Thalanjiji Country, activities for which BTAC's ongoing consultation is sought, the collaboration agreement and other items not related to this proposed activity.
- On-going Relationship Building.**
- Woodside will continue to pursue an ongoing two-way relationship with BTAC including the development of a Collaboration Agreement focused on future opportunities to work together and working towards a meeting with the BTAC board.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>Woodside commenced consultation with BTAC on 4 January 2023.</p> <p>Through consultation relevant to the activity, BTAC has:</p> <ul style="list-style-type: none"> • Stated that their interests include archaeological sites identified on nearshore islands • State a cultural obligation to care for the environmental values of sea country. • Requested Woodside supports BTAC in obtaining technical advice relating to the proposed activity which was sent to BTAC. • Expressed desire to be involved in local emergency response capability <p>Woodside has responded to these items accordingly and engaged in a two-way dialogue with BTAC about working together in the future.</p>	<p>Woodside has been in a two-way dialogue with BTAC since 4 January 2023. Consultation with BTAC has not identified any other groups or individuals relevant to communally held functions, activities or interests</p> <p>No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing two-way consultation (see Section 5 and Section 7.9.2.1). This will be facilitated via the Collaboration Agreement that Woodside and BTAC are committed to working towards.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on BTAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>

Robe River Kuruma Aboriginal Corporation (RRKAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 20 January 2023, Woodside emailed RRKAC advising of the proposed activity (Appendix F, reference 1.49) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet. The email requested information on the interests that RRKAC and its members may have within the EMBA, information on how RRKAC would like to engage, and requested that RRKAC provide information to members as required.
- On 31 January 2023, Woodside held a discussion with RRKAC representative to discuss the proposed activity and ways forward for consultation.
- RRKAC advised during the virtual meeting that the activity would need to be considered by their Heritage Advisory Committee scheduled for late February 2023.
- On 24 February 2023, Woodside emailed RRKAC to follow up on the information provided (Appendix F, reference 1.104) and the proposed February 2023 meeting. Woodside noted it is seeking RRKAC's feedback as soon as possible on the proposed activity.
- On 9 March 2023, RRKAC emailed Woodside (and copied in CEO of Wirrawandi Aboriginal Corporation (WAC)); RRKAC advised it has discussed the proposed activity with the Robe River Kuruma Heritage Advisory Committee and they have recommended that the interests of Robe River Kuruma people are best served through the joint Heritage Advisory Committee that is required under Yaburara Mardudhunera and Kuruma Marthudunera Indigenous Land Use Agreement.
- RRKAC also suggested that WAC is required to facilitate this Committee and noted there is an emerging need to deal with other proponent matters, so there is an opportunity to link the engagement from a meeting efficiency perspective.
- Between 15-17 March 2023, Woodside exchanged email correspondence with RRKAC (and WAC) and in relation to establishing a meeting with the joint Heritage Advisory Committee. The meeting was confirmed for 31 March 2023.
 - On 15 March 2023, Woodside emailed RRKAC to ask when date of joint HAC would occur and how Woodside can support it.
 - On 15 March 2023, RRKAC emailed Woodside regarding contacts for the proposed meeting.
 - On 15 March 2023, Woodside emailed RRKAC to advise who from Woodside would lead the process.
 - On 15 March 2023, RRKAC emailed Woodside to advise the joint HAC meeting was scheduled tentatively for 31 March 2023 but that this would depend on WAC's availability but that the RRKAC representatives are able to attend.
- On 31 March 2023, Woodside met with the Robe River Kuruma and Wirrawandi Joint Heritage Advisory Committee (HAC) in Karratha:
 - Woodside described the Environment Plan framework, referring to the Offshore Petroleum and Greenhouse Gas Storage Act (Environment) Regulations, NOPSEMA's role as regulator and general contents of Environment Plans.
 - Woodside encouraged HAC to raise anything which they feel is missing in the information provided during the meeting, or any issues or concerns.
 - Woodside displayed a map of activities open for feedback to be discussed in the meeting and provided a list of other upcoming activities which will be open for consultation in 2023.
 - Woodside provided an overview of the broader Scarborough Project and overview of activities.
 - HAC asked a number of questions related to the broader Scarborough project
 - Woodside described the proposed seismic activity
 - Woodside showed a video example of a seismic survey
 - Woodside described planned and unplanned environmental risks and impacts in accordance with tables provided in the Information Sheets for the activities, emphasising that unplanned risks are not expected to occur and are unlikely.
 - The EMBA for each proposed Scarborough activity was displayed, and the individual worst case loss of containment scenarios identified, noting that they are all diesel fuel releases which would only be caused by vessel collisions.
 - HAC asked what response Woodside would implement for a diesel spill. Woodside responded that response arrangements are checked by NOPSEMA and since diesel rapidly evaporates and disperses response is mainly monitoring
 - Woodside noted this concluded the Scarborough section of the meeting, and called for any further questions or feedback. None were received.
 - Woodside provided personal contact details for further feedback
 - Woodside provided NOPSEMA contact details, should the HAC desire to provide feedback directly to the regulator.
- On 3 May 2023, Woodside contacted RRKAC by mail to summarise the information presented at the meeting on 31 March 2023 and the actions for Woodside to follow up:
 - Woodside thanked the HAC for the meeting, their careful consideration of the matters and feedback provided.
 - Woodside acknowledged that the RRKAC have interests in the EMBA and noted that we want to ensure impacts are as minimal as reasonably practicable.
 - A high level overview of presented topics was provided.
 - Woodside provided responses to questions noted from the meeting that were not related to the proposed activity.
 - Woodside notified that the feedback and the letter will be included in Environment Plans that will be submitted to NOPSEMA.
 - Woodside provided responses to questions noted from the meeting that were not related to the proposed activity.
 - Woodside notified that the feedback and the letter will be included in Environment Plans that will be submitted to NOPSEMA.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>During face-to-face engagement, the RRRKAC HAC requested further information on topics related to this proposed activity which was responded to during the meeting:</p> <ul style="list-style-type: none"> • Spill response arrangements • The HAC expressed a desire for ongoing engagement and partnership. <p>The HAC raised feedback and request for further information on the Scarborough project more broadly which will be provided as part of ongoing engagement.</p>	<p>Woodside continues to engage RRRKAC in relation to the proposed activity. No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1). RRRKAC has had a reasonable opportunity to participate in consultation. Consultation with RRRKAC has not identified any other groups or individuals relevant to communally held functions, activities or interests. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on RRRKAC's functions, interests or activities. Based on the engagement to date, no additional controls have been identified.</p>

Nganhura Thanardi Garrbu Aboriginal Corporation (NTGAC)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

YMAC is the Native Title Representative Body (NTRB) for the Yamatji and Pilbara regions. NTRBs exist to provide assistance to native title claimants and holders in regards to their native title rights. No native title has been recognised over the Project Area, however YMAC is identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks.

- On 7 July 2022, Woodside met with YMAC to request advice on the appropriate cultural authorities for the Scarborough project area, including but not limited to the scope of this EP and nearby marine parks.
- On 6 January 2023, Woodside phoned NTGAC via the representative body Yamatji Maripaa Aboriginal Corporation (YMAC) for the purpose of introduction and to explain that Woodside will be sending information concerning EPs.
- On 20 January 2023, Woodside emailed NTGAC via the representative body YMAC advising of the proposed activity (Appendix F, reference 1.43) and provided a simplified Consultation Information Sheet (including a link to the detailed information sheet on Woodside's website) as well as a summary overview fact sheet.
- On 27 January 2023 Woodside phoned and emailed NTGAC/YMAC to follow up on the information provided (Appendix F, reference 1.45). Woodside requested if NTGAC required anything further ahead of a planned meeting with Woodside on 16 February 2023.
- On 1 February 2023, NTGAC/YMAC phoned Woodside to confirm the planned meeting for 16 February 2023. It was arranged to hold a subsequent phone discussion between key representatives on 10 February to discuss scope for the consultation meeting. Woodside said that it is anticipating feedback from the group on the proposed activity at this consultation meeting and asked for any specific families or individuals that Woodside should be engaging with to be invited. NTGAC/YMAC responded that consultation with NTGAC as the representative body is appropriate.
- On 10 February 2023, Woodside phoned NTGAC and described the proposed scope of the consultation meeting planned for 16 February.
- On 16 February 2023, Woodside presented to a meeting of the NTGAC/YMAC Board:
 - Woodside described the Environment Plan framework, referring to the Offshore Petroleum and Greenhouse Gas Storage Act (Environment) Regulations, NOPSEMA's role as regulator and general contents of Environment Plans.
 - Woodside encouraged NTGAC to raise anything which they feel is missing in the information provided during the meeting.
 - Woodside displayed a map of activities open for feedback to be discussed in the meeting and provided a list of other upcoming activities which will be open for consultation in 2023.
 - Woodside provided an overview of the broader Scarborough Project and overview of activities.
 - Woodside described the proposed seismic survey, noting that the purpose is to understand the gas reservoirs below the seabed.
 - Woodside provided an overview of the proposed activity and a summary of both planned and unplanned impacts and associated controls.
 - Woodside described planned and unplanned environmental risks and impacts in accordance with tables provided in the Information Sheets for the activities, emphasising that unplanned risks are not expected to occur and are unlikely.
 - NTGAC asked if Woodside could explain impacts on whales from noise.
 - Woodside replied that there has been modelling work done and applied to understanding of thresholds for hearing and behavioural impacts. It shows that there will be no lasting effect on whales, however there could be short term hearing impacts. Measures have been taken like removing driven piling from the activities to reduce noise impacts
 - Woodside further explained that there are not expected to be many turtles, dugongs or humpbacks offshore but there could be pygmy blue whales
 - YMAC asked how Woodside will monitor for whales
 - Woodside explained that it will have dedicated marine fauna observers and systems which can listen for whale song on some vessels. Presence of whales can postpone activities. Woodside noted that noise impacts are time bound and that whale tagging and behaviour monitoring shows they are migrating and unlikely to stay around for hours, reducing the likelihood of impact from noise
 - The EMBA for each proposed Scarborough activity was displayed, and the individual worst case loss of containment scenarios identified, noting that they are all diesel fuel releases which would only be caused by vessel collisions.
 - Woodside noted this concluded the Scarborough section of the meeting, and called for any further questions or feedback. None were received.
 - Woodside stated that there is significant work and consultation coming up, and it hope to spend more time with NTGAC to understand expectations and desire of how Woodside can work with NTGAC
 - YMAC expressed that they are being inundated with requests for consultation from oil and gas operators, and are working internally on processes and priorities for consultation
 - Woodside welcomed the transparency and discussion on capacity
 - NTGAC expressed that consulting on these type of activities is not viewed as wasting time, but consultation which gives nothing back to the community is not a priority. They are interesting in partnership programs and on-country engagements.
 - Woodside stated that while all the big companies will have deadlines and need to get feedback to meet legal requirements, Woodside desires it to be a jointly held process and that NTGAC desires any support or assistance please request it.
 - Woodside provided personal contact details for further feedback
 - Woodside provided NOPSEMA contact details, should NTGAC desire to provide feedback directly to the regulator.
- On 21 February 2023, NTGAC/YMAC emailed Woodside to seek clarification of the attendee names at the 16 February 2023 Board meeting.
- On 21 February 2023, Woodside emailed NTGAC/YMAC the attendee names at the 16 February 2023 Board meeting and provided a copy of the presentation pack. Woodside followed up on request for any further feedback on the proposed activity.
- On 22 February 2023 NTGAC/YMAC emailed Woodside to thank Woodside for sending the relevant information.
- On 22 March 2023, Woodside followed up by phone with NTGAC/YMAC on any feedback on the proposed activities.
- On 28 March 2023, YMAC followed up with Woodside on a Woodside action arising from the 16 February meeting to supply photos and diagrams in relation to the different activity.
- On 31 March 2023, Woodside followed up with the relevant photos and diagrams, noting contact details and welcoming any further feedback. Woodside thanked NTGAC for their work to date and requested that NTGAC reach out for any assistance.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>During face-to-face engagement, the NTGAC requested further information on topics related to this proposed activity which was responded to during the meeting:</p> <ul style="list-style-type: none"> • Potential impacts of noise on whales • Whale monitoring arrangements <p>The NTGAC expressed a desire for ongoing engagement and partnership.</p>	<p>Woodside continues to engage NTGAC via YMAC in relation to feedback following the 16 February 2023 Board meeting.</p> <p>No material issues or concerns related to the proposed activity were raised during consultation to date. Woodside invited further feedback in accordance with Woodside's approach to ongoing consultation (see Section 7.9.2.1).</p> <p>NTGAC has had a reasonable opportunity to participate in consultation.</p> <p>Consultation with NTGAC has not identified any other groups or individuals relevant to communally held functions, activities or interests</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on NTGAC's functions, interests or activities.</p> <p>Based on the engagement to date, no additional controls have been identified.</p>
Native Title Representative Bodies		
<p>Yamatji Marlpa Aboriginal Corporation (YMAC)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p>		
<p>Summary of information provided and record of consultation:</p>		
<p><u>Historical Engagement</u></p>		
<ul style="list-style-type: none"> • On 7 July 2022, Woodside met with YMAC to request advice on the appropriate cultural authorities for the Scarborough project area, including but not limited to the scope of this EP and nearby marine parks. • Woodside described the Scarborough Project and its footprint, and gave an overview of indigenous parties consulted. • Woodside noted that YMAC was identified in the North West Marine Parks Network Management Plan as the contact for identifying cultural values in nearby Australian Marine Parks. Woodside sought to understand if the cultural values of the nearby Gascoyne Marine Park may extend into the offshore Scarborough project areas. • Woodside requested advice on how best (in addition to work completed) to identify any cultural values in the Marine Parks and in the broader project footprint. • YMAC requested Woodside provide the relevant detailed information relating to the location and extent of the project. 		
<p><u>Ensuring Sufficient Information and Sufficient Time</u></p>		
<ul style="list-style-type: none"> • On 8 July 2022, Woodside emailed YMAC providing the requested information including a link to the factsheet relevant to this EP. • Woodside advised it would like to establish a process to cross check its understanding of cultural and spiritual values associated with proposed offshore development and surrounding areas. We note that YMAC has been listed as the Native Title Representative body in the North West Marine Parks Network Management Plan for nearby Australian Marine Parks, and would therefore like to confirm cultural values of these marine parks don't extend into Woodside's areas of interest. • Woodside provided an extract from a related Scarborough EP which detailed further context and Woodside's current understanding of cultural and spiritual values associated with proposed offshore development and surrounding areas. • On 19 July 2022, YMAC responded to Woodside: • YMAC stated the area Woodside has identified requires correspondence directed to Murujuga Aboriginal Corporation and Ngarluma Aboriginal Corporation. • The extent to which each corporation has interests specifically over the area of this EP was not advised, but both have been involved in assessments of cultural values as detailed below. YMAC does not act for either corporation. • On 13 March 2023, Woodside emailed YMAC as to whether YMAC considers itself a 'relevant person' under sub regulation 11 A (1) of the Environment Regulations for the purposes of consultation on EPs and, if so, whether that relevance is limited to a facilitation function in its capacity as a representative of Traditional Owner groups/corporations that overlap or adjacent to the environment that may be affected (EMBA) of a particular activity. • On 20 March 2023, YMAC replied to confirm that in its view it is a 'relevant person' under sub regulation 11 A (1) of the Environment Regulations for the purposes of consultation on EPs only in relation to its facilitation and coordination function as a Native Title Representative Body under applicable federal legislation. YMAC does not intend to provide substantive comment on the content of EPs. • On 20 March 2023, Woodside emailed YMAC to thank it for its reply and to advise that that this assessment would be included in Woodside's EPs. • On 20 March 2023, YMAC emailed Woodside confirming that it is appropriate to use the assessment in the EPs. 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>YMAC has advised that the most appropriate stakeholders for the Scarborough project generally are Murujuga Aboriginal Corporation and Ngarrluma Aboriginal Corporation who are not represented by YMAC. YMAC has provided feedback that in its view it is a 'relevant person' under sub regulation 11 A (1) of the Environment Regulations for the purposes of consultation on EPs only in relation to its facilitation and coordination function as a Native Title Representative Body under applicable federal legislation, and does not intend to provide substantive comment on the content of EPs.</p>	<p>YMAC is the Native Title Representative Body for the Yamatji and Pilbara regions of Western Australia. As such, they are not a Prescribed or Registered Native Title Body Corporate representing the cultural rights of a Traditional Custodian Community but exist to assist native title claimants and holders. YMAC is identified in the North-west Marine Parks Network Management Plan 2018 (DNP, 2018) as the Native Title Representative Body, noting no marine parks overlap the Operational Area. Woodside has approached YMAC to confirm the best approach to confirm additional cultural values (if any) within the Operational Area. Woodside has consulted with YMAC in relation to its facilitation and coordination function as a Native Title Representative Body under applicable federal legislation, and it has responded that it does not intend to provide substantive comment on the content of EPs. Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received (including any relevant new information on cultural values), it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (refer to Section 7.6).</p>	<p>As YMAC has indicated that it does not intend to provide substantive comment on the content of EPs, no further controls are required.</p>
Local government and community representative groups or organisations		
<p>Karratha Community Liaison Group (KCLG)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 21 September 2022, Woodside presented to the KCLG and provided consultation information on related petroleum activities for the Scarborough Project, which included reference to the proposed activities for this EP. On 27 January 2023, Woodside emailed the KCLG advising of the proposed activity and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F Appendix F, reference 1.91). On 24 February 2023, the Pilbara Port Authority responded and noted that as the activity occurs outside of the Port waters it has no comments. 		
<p>No feedback was received from the KCLG with the exception of the Pilbara Port Authority, which advised it had no comments on the proposed activity. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside notes that no feedback was received from the KCLG with the exception of the Pilbara Port Authority, which advised it had no comments on the proposed activities. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
Exmouth Community Reference Group (ECRG)		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 7 April 2022, Woodside presented to the ECRG and provided consultation information on related petroleum activities for the Scarborough Project, which included reference to the proposed activities for this EP. On 17 November 2022, Woodside presented an updated on its planned Scarborough activities which included a slide on the proposed Seismic activity (Appendix F, reference 1.38). On 1 February 2023, Woodside emailed the ECRG advising of the proposed activity (Appendix F, reference 1.64) and provided an updated Consultation Information Sheet. On 22 February 2023 Woodside sent a follow up email (Appendix F, reference 1.93). On 3 March 2023, an Exmouth CRG representative emailed Woodside: <ul style="list-style-type: none"> Provided comment on the proposed activity and requested information on the timeline for the activity and could it be for a continual period up to 70 days or intervals. On 17 March 2023, Woodside emailed the ECRG representative: <ul style="list-style-type: none"> Advised that the planned duration for the survey is 80 days. The planned duration includes a maximum of 70 days of seismic data acquisition, plus 10 days of contingency for potential vessel or equipment down time and adverse weather conditions. The exact survey duration is dependent upon the final 4D activity scope. The activity is planned to commence in Q2 or Q3 2023 with the earliest potential commencement date for the survey being upon EP acceptance. The survey is planned to be continuous but may have intermittent periods to account for adverse weather conditions or potential vessel or equipment down time. 		

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>An Exmouth CRG representative queried about the timeline for the activity. Whilst feedback has been received, there were no objections or claims.</p>	<p>Woodside has provided relevant information to address the ECRG representative's questions. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>
Other non-government groups or organisations		
Conservation Council of WA (CCWA)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation:		
<ul style="list-style-type: none"> • On 12 August 2021, CCWA emailed Woodside about the broader Scarborough Offshore Gas Project and upcoming draft Environmental Plans, and stating it wishes to be consulted as a relevant person. • On 20 August 2021, Woodside emailed CCWA advising of the proposed activity and provided a Consultation Information Sheet • On 14 September 2021, CCWA emailed Woodside requesting: <ul style="list-style-type: none"> - Additional time to provide feedback - A copy of the draft EP's and other application documents including studies that will be submitted to the regulator in support of the EP's. • On 17 September 2021, Woodside responded to CCWA's feedback. • On 15 December 2021, Woodside received third-party correspondence via NOPSEMA in relation to a related Scarborough activity. Following assessment of the feedback, Woodside determined that the feedback from CCWA on 27 October 2021 had included the following feedback, claims and objections that could also be related to the proposed activity the subject of this EP. The feedback also included a number of additional third-party supporting documents: <ul style="list-style-type: none"> - CCWA asserted that impacts on the Dampier Archipelago National Heritage Place, from the development of the Scarborough gas field, need to be assessed in EP's for the Scarborough Project. - CCWA asserted its previous request for information on direct and indirect impact on the Murujuga Petroglyphs as it had not been met. - CCWA claimed that Woodside's consultation process has been restricted and consultation with a wider group of 'relevant' persons is required (particularly Indigenous groups (i.e., MAC) but also trade union groups, youth groups, health sector groups and government agencies). • On 25 February 2022, Woodside responded to CCWA and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate (Appendix F, reference 1.29). • Woodside advised the purpose of the PAP is the appraisal of the offshore Scarborough gas fields to help inform the optimised management of the hydrocarbon reserves. <ul style="list-style-type: none"> ▪ The EP assesses both direct and indirect environmental impact risks associated with the PAP, having regard to the nature and scale of the PAP. ▪ The extraction of Scarborough gas for onshore processing is not included in the PAP for this EP. ▪ Therefore, the impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP but will be evaluated in Scarborough Eps as appropriate. No changes have been made to the EP. • Section 5 has been updated to clarify Woodside's consultation process, in line with the requirements of sub regulation 11A (1) of the Environment Regulations to identify relevant persons for the purposes of consultation on its EPs. Woodside provided criteria for the identification of relevant persons. • Woodside confirmed that for the broader Scarborough project, it has engaged closely with relevant stakeholders (including MAC and other relevant Traditional Owner groups) since 2018. This includes consultation on relevant Scarborough activities in Commonwealth waters during development of the Scarborough Offshore Project Proposal, and activities in State waters as part of the Scarborough Project Nearshore Component environmental review. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>CCWA provided feedback via NOPSEMA relating to:</p> <ul style="list-style-type: none"> • Impacts on the Dampier Archipelago National Heritage Place • Consultation requirements under the Regulations <p>Whilst feedback has been received, there were no objections or claims.</p>	<p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Where an amendment has been made to the EP in relation to any of the claims or objections raised, a reference to the updated Section of the EP is shown in the relevant responses contained in Appendix F.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>

Greenpeace Australia Pacific (GAP)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 8 April 2022 during the course of preparing this EP, GAP self-identified and requested to be consulted on this and other Woodside EPs. GAP also made requests for additional information relating to the proposed activity.
- On 29 April 2022, Woodside responded to GAP's feedback.
- On 1 June 2022, Woodside met with GAP representatives to discuss Woodside's broader business, including the Scarborough development.
- On 15 June 2022, Woodside emailed GAP (Appendix F, reference 1.33):
 - Woodside advised it has further reviewed GAP's letter from 8 April 2022 and considers that GAP is a relevant person under Regulation 11A of the OPGGS Regulations, for the purposes of consultation on this EP.
 - Woodside attached a detailed statement of response to GAP's request for additional information.
- On 29 June 2022, GAP emailed Woodside (NOSEMA and NOPTA CC) and provided a letter containing feedback on the proposed activity with a number of claims/objections and requests for further information relating to the proposed activity.
- GAP claim that Woodside has not consulted with all relevant persons and incorporated their feedback into the EP.
 - GAP requested Woodside consult with additional relevant persons (CCWA, AMCS, Indigenous stakeholders [and outline what engagement has taken place], marine tourism representatives [that operate not just in the OA but also in the vicinity of BIAs impacted within the EMBA).
- Disclosure of depth of experience of attendees of the Environmental Risk and Impact Identification Workshop.
 - GAP requests that Woodside provide the regulator with additional information about potential and actual conflicts of interest amongst the workshop participants to ensure the regulator and public can have confidence about the hazard identification and evaluation.
- Routine acoustic emissions relating to seismic survey equipment and the avoidance of impacts. GAP also made a number of claims about the impacts of the activity and recommendations:
 - Additional information to explain why the activity (survey) needed to be repeated.
 - Requests that Woodside use lower impact technology alternatives in line with ALARP, and if they don't provide evidence as to why.
 - Woodside has failed to address direct impacts to fauna, particularly predator/prey interactions and how an increase in zooplankton mortality impacts whales.
 - Woodside assess and report on potential cumulative impacts from all activities (upstream and downstream) to be conducted at the Scarborough site as a whole, especially in relation to acoustic impacts, and considers interactive cumulative effects.
- Woodside should commission additional modelling estimate the activity's impact on zooplankton.
 - Noise pollution exceeding the impact thresholds identified in the EP should be prohibited by Woodside during peak cetacean activities (April to July northern migration and November to December southern migration), and additional acoustic monitoring to be done.
- Evidence about likely masking impacts and song interference with respect to cetaceans.
 - Distance modelling values in Tale 6-7 for all species be revisited.
- Assess options to perform acoustic monitoring for cetaceans up to 60.7km away from the sound source.
 - Activities should cease immediately after malfunction of or damage to the passive acoustic monitoring system.
- Full assessment of the displacement costs and impacts for cetaceans.
 - Before and after monitoring of marine mammal presence, density and distribution, plus submit a monitoring and mitigation plan.
- Routine acoustic emissions relating to vessels and AUV. GAP recommends that Woodside includes modelling evidence to demonstrate the distance over which continuous noise levels could potentially impact cetacean behaviour, and factor results into its impact assessment.
 - Accidental hydrocarbon release: vessel collision. GAP recommended that:
 - The EMBA be recalculated based on the amended worst-case scenario, and should it extend into the Ningaloo World heritage area or any of the marine protected areas following the recalculation, it should be taken into consideration in the EP.
 - Table 6-17 should be expanded to include the various BIAs that overlap with the EMBA and Montebello AMP. Additionally, information should be included as to the probability of hydrocarbon contact within each BIA.
- Timing of the activities be restricted further to help reduce the likelihood of a spill impacting threatened species.
 - Physical presence: vehicle collision/entanglement with marine fauna. GAP recommended that:
 - Woodside employ two additional marine fauna observers on each support vessel
 - All vessels operated by Woodside, its contractors or servicing the project be restricted to a maximum speed of 8 knots when in the operational area (except in the event of an emergency).
- GAP makes a number of claims that Woodside is not fit and proper to hold an Access Authority and Environmental Plan.
 - GAP claim that until Woodside provides more information on the aspects raised in its letter, it's not possible for the regulator to assess whether impacts have been reduced to acceptable and ALARP levels. If GAP's concerns are not addressed, it recommends that the regulator does not accept the EP.
- GAP requested an updated version of the EP once it has been drafted.

- On 22 July 2022, Woodside emailed GAP and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate (Appendix F, reference 1.34).
- GAP has been provided with a reasonable level of information and a sufficient period to respond for the purposes of consultation on this EP.
- Woodside has complied with the consultation requirements set out in Reg 11A of the Environment Regulations in relation to the consultation process for this EP.
 - This includes consultation with CCWA, and a summary of that consultation is provided in this EP (Section 5.7; Revision 3).
 - Woodside has followed requirements of sub-regulation 11A (1) of the Environmental Regulations to identify relevant persons for its EPs.
 - Woodside has engaged with relevant stakeholders (including MAC and other relevant Traditional Owner groups) since 2018. This includes consultation on relevant Scarborough activities in Commonwealth waters during the development of the Scarborough Offshore Project Proposal, and activities in State waters as part of the Scarborough Project Nearshore Component environmental review.
 - Ongoing consultation can occur during the life of an EP and enables updates on activities and a continued understanding of stakeholder views. The EP has been updated (Section 5.8 and Section 7.9.2.1; Revision 3) to outline Woodside's ongoing consultation approach and engagements in accordance with Regulation 14 (9) of the Environmental Regulations.
 - Woodside advised it welcomes ongoing feedback on its activities from stakeholders. Woodside also provided details of its publicly available Information sheets on Woodside's EPs.
- Woodside confirmed the experience of the participants at the Environmental Risk and Impact Identification workshop to address GAP's information request.
- Woodside provided an explanation as to why the survey must be repeated, as no further uplift can be gained from the 2004, 2010 and 2018 data. Additionally, the original survey does not extend over the full Scarborough gas field or over the Jupiter gas field.
- Woodside advised that the technical alternatives proposed by GAP are either yet to be developed commercially (marine vibroseis) or are not considered a lower impact technology (ROV deployed OBN).
- The EP has been updated to include consideration of marine vibroseis in the ALARP assessment (Section 6.6.3; Revision 3). Due to not yet being commercially available, as described above, it has not been adopted.
- Woodside confirmed that the risk assessment in the EP concludes that impacts to zooplankton are likely to be localised (>110m from the seismic source) and localised changes in zooplankton abundance are likely to be replenished and indistinguishable from natural levels and distributions within hours of a seismic survey vessel passing.
 - The EP (Section 6.6.2; Revision 3) has been updated to include a statement that impacts to zooplankton are unlikely to result in impacts to higher order trophic levels.
- Woodside has assessed the cumulative impacts of the Petroleum Activities Program in relation to other petroleum activities which could realistically result in overlapping temporal and spatial extents. The potential cumulative impact of concurrent seismic activities is assessed in Section 6.6.1 (Physical presence) and Section 6.6.2 (Routine Acoustic Emissions; Seismic Survey Equipment) (Revision 3).
 - The EP was updated to acknowledge that Scarborough drilling and completion activities may be undertaken within WA-61-L however there will be no temporal overlap and therefore no cumulative impacts are predicted with this activity. This is outlined in Section 6.3 of the EP (Revision 3).
- Woodside advised that additional modelling over and above the mortality threshold (110m) for zooplankton is not warranted. Woodside also provided information about its involvement in the North West Shoals Research Program.
- Woodside explained its use of JASCO Animal Simulation Model including Noise Exposure (JASMIN) to predict the exposure of animals (pygmy blue whales) to sound arising from the seismic activity. It is regarded as best practice for surveys taking place within or adjacent to pygmy blue whale migration and foraging BIAs.
 - Based on the animal modelling results, the conservative range for potential TTS effects in pygmy blue whales is ~22 km from the seismic source, compared with 60.7 km range predicted from the acoustic modelling. The closest point of approach from the Active Source Area and the migration BIA is ~30km, and therefore, pygmy blue whales will continue to utilise the migration BIA without injury, and therefore the activity is not inconsistent with the Conservation Management Plan for Blue Whales.
- Woodside provided results from the Thums et al. (2022) and Double et al. (2014) satellite tracking studies on pygmy blue whale migration, which does not support GAP's hypothesis that the Active Source Area is frequently used by pygmy blue whales.
- Woodside advised that it is highly unlikely that the activity would displace pygmy blue whales from any critical habitat, such as foraging location or resting area.
- Woodside advised that the EP (Section 6.6.2; Revision 3) has been updated to provide further information on masking impacts to pygmy blue whales.
 - Woodside advised that individual pygmy blue whales are expected to pass through the ensouffled area in less than 24 hours and are highly unlikely to have exposure ties to cause TSS.
 - As impacts to whales are already reduced to ALARP and acceptable levels, acoustic monitoring for cetaceans up to ~60m from the sound source is considered disproportionate to any environmental benefits.
- Woodside advised that the adopted thresholds presented in Table 6-7 are based on the best data available published in peer-reviewed literature and represent conservative internationally accepted and applied impact evaluation thresholds.
 - Woodside provided additional information about the TSS threshold level and SPL in regard to the potential impact from acoustic emissions. Woodside advised there are multiple SEL threshold criteria that can be applied and the marine mammal behavioural threshold presented in Table 6-5 is based on current NOAA (2019) criterion for marine mammals. This is why the TSS onset range always considerably exceeds the behavioural response range in modelling studies of acoustic emissions from seismic surveys.
- Woodside confirmed that the TSS impacts to LF-cetaceans are predicted to be constrained to within ~22km (with a 24 hour exposure) of the seismic source (Table 6-7). Woodside reiterated information about the outcome of the tagging study of pygmy blue whales. Therefore, as impacts are already reduced to ALARP and acceptable levels, no TSS is predicted in pygmy blue whale migration and acoustic monitoring up to ~60km from the sound source is considered disproportionate to any environmental benefit.
- Woodside advised that the passive acoustic monitoring system (PAM) is engineered for multiple redundancy and a malfunction or failure due to catastrophic streamer damage is highly unlikely and is managed to ALARP, e.g. a number of conditions must be met to allow operations to continue without PAM, as described in the EP.
- Woodside advised that the Activity Source and Operational areas for the Scarborough 4D MSS, whilst within the distribution range for pygmy blue whales, are outside of the migration BIA, and also not in an area where foraging or resting is likely to take place. Additionally, the activity does not overlap BIA's for any other marine mammal species. Hence, dedicated pre-and post-survey monitoring of marine mammals is not warranted.
- Woodside advised that seismic source emissions are not regarded as continuous a noise source as they are brief and intermittent with rapid rise times and decay back to ambient levels (within a few seconds).
 - Modelling and measurement studies have demonstrated that the threshold for behavioural responses in marine mammals from continuous noise sources would not be exceeded beyond a range of several kilometres from relatively small, slow-moving vessels such as a seismic survey vessel accompanied by a support vessel.
- Woodside advised that the worst-case scenario in the EP is based on collision, an impact between two moving vessels. Furthermore, no change has been made to the worst-case scenario as it is in line with calculating the maximum worst case spill, for a collision, based on the volume of the largest fuel tank. Woodside noted that collision relating sinking of a seismic survey vessel has never occurred in Australia in over 50 years of seismic operations.
- Woodside advised that the inclusion of the probability of hydrocarbon contact with the BIA has not been included as it is not considered to help inform the impact assessment and demonstration of ALARP and acceptability.
 - The impact and ALARP assessment in the EP has demonstrated that in the highly unlikely event that a spill occurs and that the plume reaches those BIAs, that the risk is ALARP acceptable.
 - The Montebello AMP was included in the EMBA in Section 4 conservatively, however modelling did not predict contact with the AMP ecological thresholds. Section 4 (Revision 3) has been updated to clarify.

- Woodside advised a number of controls that are planned to be implemented in order to reduce the risk of a collision. In the event of a worst-case spill, impacts would be limited to individual threatened species and are not expected to impact on the overall population viability of the species.
 - The risk has been managed to ALARP and acceptable level and no changes have been made to the EP.
- Woodside advised that the use of additional marine fauna observers on the support vessel (over and above two employed on the support vessel) is not warranted.
 - Woodside reiterated information provided about the Active Source and Operational areas of the Scarborough 4D MSS being outside the migration BIA, and accordingly, the likelihood of encountering the pygmy blue whale and other cetaceans is expected to be low.
 - The EP includes application of the EPBC Act Policy Statement 2.1 Part B.6 – Adaptive measures to minimise the potential impacts to pygmy blue whales from seismic noise, which will be triggered if encounters with pygmy blue whales are more frequent than suspected.
- Woodside confirmed that the seismic vessel maintains a constant upper speed of 5 knots when in operation to minimise the noise of movement of water over the seismic streamers. This largely dictates the speed of both the escorting support and chase vessel that accompanies the survey vessel.
 - Vessels adopt the go-slow buffers around marine fauna as per EPBC Regulations 2000 – Part 8 Division 8.1 Interacting with cetaceans (C14.1).
 - The EP has been updated to include consideration of vessel speed in the ALARP assessment (Section 6.7.6; Revision 3).
- Woodside has responded to Greenpeace's concerns raised and updated the EP where indicated. Woodside considers the impacts have been reduced to ALARP and acceptable levels, as demonstrated in the EP. NOPSEMA will determine whether they are reasonably satisfied that the EP meets the acceptance criteria, including criteria 10A (b) and (c).
- Full copies of draft EPs are not provided to stakeholders while they are being developed or under assessment. The EP has been revised through the NOPSEMA assessment process and the responses provided in this document reflect the information under assessment with NOPSEMA.
 - On 2 August 2022, GAP provided correspondence to NOPSEMA (Woodside CC). GAP requested an additional two weeks to provide feedback.
 - On 16 August 2022, GAP emailed Woodside (NOPSEMA CC):
 - GAP reiterated its feedback, objections and claims from 29 June 2022 relating to:
 - Consultation with all relevant persons
 - Evaluation of all impacts and risks
 - Demonstrating that the environmental impacts and risks will be reduced as low as reasonably practical
 - Demonstrating that the environmental impacts and risks will be of an acceptable level
 - The EP is inconsistent with Blue Whale Conservation Management
 - GAP provided additional information and literature to its claims.
 - No new claims or objections were raised requiring additional specific mitigation measures or controls.
 - Greenpeace request copies of specific documents cited in the Environment Plan.
 - On 1 September 2022, GAP provided correspondence to NOPSEMA (Woodside CC) that contained a number of claims/objections relating to the proposed activity.
 - GAP requests that NOPSEMA not accept the EP as Woodside has not met its consultation obligations under reg 11A of the Environment Regulations nor demonstrated the criteria for acceptance of the Environment Plan in reg 10A.
 - GAP requests that, if necessary, the regulator should make a request to Woodside for further information under reg 10(1)(b) in relation to the additional information identified as being required by GAP.
 - On 12 September 2022, Woodside responded to GAP and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate (Appendix F, reference 1.35).
 - Woodside noted that correspondence dated 1 September 2022 relates to Woodside's incorporation of GAP's previous feedback in the Scarborough 4D B1 Marine Seismic Survey Environment Plan, and no new claims or objections have been raised.
 - Woodside added following further feedback and assessment the EP has been updated (Section 5, Revision 4) which includes an updated consultation approach and relevant person and additional person identification process (see Section 5.4). The update to the EP includes further clarification on the identification of a person whose functions, interests or activities may be affected by the activity.
 - Woodside provided details of the number of factors that inform the stakeholder consultation approach.
 - Woodside described its process to determine that the marine tourism representatives' function, interests and activities are not impacted by the proposed activity.
 - Woodside has updated the EP (Section 7.9.4.3, Revision 4) and the First Strike Plan (Appendix I, Revision 4) to provide additional guidance on its incident reporting approach.
 - Woodside advised and listed specific controls that are in the EP (Section 6.6.2, Revision 4) to manage risk to an ALARP and acceptable level, addressing GAP's specific claims.
 - Regarding the potential for acoustic emissions from the seismic source to mask calls between migrating pygmy blue whale mothers and calves, Woodside confirmed potential impacts are limited by a number of factors and masking between mother and calves is not expected. Further clarification has been included in Section 6.6.2 (Revision 4).
 - Woodside has responded to GAP's concerns raised and updated the EP where indicated. Woodside considers that the impacts have been reduced to ALARP and acceptable levels, as demonstrated in the EP. NOPSEMA will determine whether they are reasonably satisfied that the EP meets the acceptance criteria, including criteria 10A (b) and (c).
 - Woodside will review list of documents requested and determine if they can be provided, where appropriate.
 - Woodside advised the availability of the reports and findings of the North West Shoals to Shore Program on the AIMS website.
 - On 6 December 2022, GAP provided correspondence to Woodside (NOPSEMA CC) that contained a number of claims/objections relating to the proposed activity.
 - GAP reiterated its feedback, objections and claims from 29 June 2022 relating to:
 - Consultation with all relevant persons
 - Evaluation of all impacts and risks
 - Demonstrating that the environmental impacts and risks will be reduced as low as reasonably practical
 - Demonstrating that the environmental impacts and risks will be of an acceptable level
 - The EP is inconsistent with Blue Whale Conservation Management
 - GAP asks that Woodside assesses (and provides to NOPSEMA) the tracking data underlying the pygmy blue whale movement research papers to justify its claim

- GAP continues to contend that the EP is inconsistent with the Blue Whale Conservation Management Plan.
- GAP asks Woodside to provide comprehensive justification (beyond the EP and JASCO modelling) as to how animal modelling demonstrates compliance with requirement of the Blue Whale Conservation Management Plan.
 - GAP asks Woodside for justification for failing to base its impact assessment on the slowest pygmy blue whales in population.
 - GAP asks that Woodside provide information on the total number of tracked whales whose behaviour has been incorporated into the animal modelling, and what proportion of the population this number equates to.
 - GAP considers that the EP should not rely on animal modelling to define the area over which acoustic impacts will exceed the low frequency threshold values. The modelling is not sufficient to “demonstrate” the matters in reg 10A(b)-(c) of the Regulations.
- GAP requests that Woodside provides full and detailed justification (beyond what provided in the EP and Koessler et al 2021) for the use of assumptions and inputs that underlie the JASCO animal modelling.
 - GAP also makes specific information requests about animal movements in migration.
 - GAP makes information requests about closest point of approach for pygmy blue whales, data summarising maximum distance relating to acoustic impacts and injury
- GAP claims that Woodside is failing to adhere to the principles of ecological sustainable development outlined in NOPSEMA’s EP Decision Making Guideline, specifically “precautionary principle”, and “biodiversity principle”.
- GAP contends that Woodside has not reduced acoustic risk and impact to pygmy blue whales to either an acceptable or ALARP level, therefore not meeting the criteria in reg 10A of the regulations.
- GAP urges Woodside to amend the impact assessment and the mitigation actions to address its concerns and ensure all pygmy blue whales can continue to use the migration BIA without injury.
- GAP urges Woodside to remove the animal modelling from the impact assessment.
 - GAP states that if Woodside continues to rely on animal modelling despite its concerns, it urges Woodside to amend the underlying inputs, assumptions and methodology to fully address the issues it has raised; and
 - GAP urges Woodside to provide the additional information it has requested.
- GAP requested full text for sections 5.8 and 7.9.2.1 of revision 5 of the EP so it can understand the changes to Woodside’s approach to ongoing consultation.
- GAP again asked for an updated version of the EP to see how its feedback had been incorporated.
- GAP reiterated its request from 16/08/22 for full texts for the references.
- On 17 March 2023, Woodside emailed GAP and attached a detailed table of responses to address specific claims and objections in the 1 September 2022 and 6 December 2022 correspondence regarding the proposed activity, where appropriate (Appendix F, reference 1.132).
 - Woodside thanked GAP for its correspondence on the EP and advised it has revisited the available telemetry data (Thums et al., 2022) which has confirmed the track for one individual pygmy blue whale that travelled to the west of the migration BIA in the peak northbound migratory season (June 2022).
 - Woodside confirmed it has included a precautionary additional control (C4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the Seismic EP.
 - The control will be implemented in the peak northbound migration season (May and June) and comprises a spotter vessel (with two Marine Fauna Observers onboard) ahead of the seismic vessel to observe for PBWs.
 - Woodside advised that based on the information provided throughout extensive consultation with GAP and set out within Attachment A of the email, Woodside believes it has provided GAP with sufficient information to allow GAP to provide Woodside with an outline of its claims, interests and activities as they relate to the proposed activity.
 - Woodside has also provided GAP with details of amendments made to the EP including additional controls, throughout consultation.
 - Given the well-informed feedback received together with the length of time the Seismic EP has been open for comment, any further feedback GAP provides on the Seismic EP will be accepted and considered as part of ongoing consultation.
 - Woodside has undertaken a comprehensive assessment, including full justification of the impacts and risks for the regulator to assess in accordance with: Offshore Petroleum and greenhouse Gas Storage (Environment) Regulations 2009 (the Environment Regulations) and NOPSEMA Guidance Note (N-04750-GN1344 A339814) EP Content Requirement.
 - Woodside advised that GAP’s correspondence of 2 August 2022 and 16 August 2022 has been addressed by Woodside in its correspondence to GAP dated 12 September 2022.
 - This includes a response to JASCO’s JASWINE modelling referenced in the 1 September letter.
 - Where an amendment has been made in the EP in relation to the claims or objections raised, a reference has been included in the table.
 - The accepted EP will be published by the regulator NOPSEMA after assessment and acceptance.
 - Woodside advised that the data used as input for the behavioural profiles was collated from sources provided in the Kossler et al. 2021 report. The satellite tracking data used to determine travel speed was sourced specifically from Möller et al. (2020). Refer to section 6.6.2 (Revision 0) of the EP for the assessment of potential impacts to pygmy blue whales.
 - Woodside confirmed that the proposed activities are not inconsistent with the Blue Whale Conservation Management Plan. Woodside referred to Table 6-21 and Demonstration of Acceptability in Section 6.6.3 (Revision 0) in the EP which provides the assessment of relevant activities against the Blue Whale Conservation Management Plan, including relevant Environmental Performance Outcomes.
 - Woodside confirmed as set out in the EP (Revision 0), as part of the demonstration of acceptability, an assessment is undertaken to demonstrate that the PAP detailed in the EP are not inconsistent with relevant principles of ESD (refer Section 2.7.2).
 - For all impacts and risks assessed in Section 6 of the EP an assessment was conducted to determine if the PAP was consistent with relevant principles of ESD. It determined that the activity is consistent with principles of ESD a), b), c), and d).
 - Principle e) is not relevant to the activity.
 - Woodside referred to Section 6.5.3 for the potential impacts of underwater noise generated by seismic survey equipment assessment and Section 6.5.4 for vessels (Revision 0). Woodside advised the impact assessments use peer-reviewed literature and scientific studies, supported by activity-specific underwater sound propagation modelling and applicant of internationally recognised thresholds.
 - The impact assessments consider a range of receptor groups including (but not limited to) pygmy blue whales.
 - The impact assessments determined highest potential consequence for these receptors to be ‘D’ (Minor, short-term impact) for noise from survey equipment and ‘F’ (No Lasting Effect, localised impact not significant to environmental receptors) for noise from project vessels.
 - Woodside referenced a list of controls in the EP (Section 6.5.3, Revision 0) to manage risk to an ALARP and acceptable level.
 - Woodside referenced the additional control (C 4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the EP.
 - Woodside advised the accepted EP will be published by the regulator NOPSEMA after assessment and acceptance. Woodside otherwise confirmed that the nature of the proposed seismic activity, as well as the location and description of the activity as set out in the Seismic EP and summary information documents, has not changed and remains the same as in the recently submitted versions of the EP.
 - Woodside advised, where appropriate, it has provided GAP with details of amendments made to the EP including additional controls, throughout consultation.
 - Woodside confirmed that the references requested by GAP are publicly available and provided the list of publicly available references.

- On 28 March 2023, GAP emailed NOPSEMA (and sent a copy of the email to Woodside) regarding this EP (originally submitted to NOPSEMA on 11 October 2021) and the additional information provided to GAP from by Woodside on 22 July 2022, 12 September 2022 and 17 March 2023.
 - GAP stated the information provided to GAP by Woodside and the consultation period fell short of the regulations and the EP did not meet the regulation criteria. Therefore, GAP urged NOPSEMA to not accept the EP.
 - GAP reaffirmed its relevant person status and provided a summary of consultation with Woodside to date.
 - GAP provided an explanation as to why consultation had not met minimum requirements.
 - GAP's relevant person consultation with Woodside on the EP was insufficient; Woodside had failed to:
 - adapt the consultation process to GAP's needs;
 - provide sufficient information;
 - provide sufficient time to consider additional information; and
 - meet the general principles for effective consultation.
 - GAP concluded that Woodside's consultation did not meet the requirements of NOPSEMA's Consultation Guideline or the "Environment Plan decision making" guideline. Woodside had not met its consultation obligations under reg 11A of the Environment Regulations nor demonstrated the criteria for acceptance of the Environment Plan in reg 10A. GAP urged NOPSEMA to not accept the EP and requested Woodside undertake consultation with GAP as required by reg 11A of the Environment Regulations.
- On 24 April 2023, GAP emailed Woodside regarding this EP and the additional information sent to GAP on 22 July 2022, 12 September 2022 and 17 March 2023. GAP discussed Woodside's consultation process to date and provided further feedback on this EP and the additional information Woodside had provided on the above dates. GAP:
 - Reaffirmed its relevant person status and provided a summary of consultation with Woodside to date.
 - Provided an explanation as to why consultation had not met minimum requirements.
 - Detailed the form of information it required as per the Regulations and NOPSEMA's Consultation Guideline as Woodside had not provided GAP with sufficient detailed information.
 - Detailed GAP's expectation around the provision of sufficient time for consultation.
 - Provided a detailed summary of the outstanding additional information GAP required.
 - Concluded by stating that until Woodside provided more information on the aspects detailed in the letter, it was not possible for GAP to provide feedback on the impacts and risks of the activity, nor was it possible for the regulator to assess whether the EP met the criteria and could be accepted.
- On 1 June 2023, Woodside emailed GAP in regard to its correspondence on this EP specifically referring to GAP's additional questions received in correspondence to NOPSEMA (cc. to Woodside) dated 28 March 2023 and Woodside's previous four responses regarding the Seismic EP.
 - Woodside stated that based on the information provided throughout extensive consultation with GAP since June 2022, Woodside has provided sufficient information and ample opportunity for GAP to review the information provided, provide input on the proposed activity, and respond to Woodside's consultation information.
 - Woodside pointed out that in GAP's correspondence on 28 March 2023, GAP stated "...our functions, interests and activities demand a high level of participation in the consultation process in the Environment Plan. We have previously provided thorough interrogation of various complex and technical elements within the Environment Plan and will continue to do so." Woodside stated that GAP has clearly demonstrated it has extensively reviewed the material that Woodside has made available for the requirements of consultation, as well as the full draft EP. Should GAP have further comments on the material it has interrogated, it should provide these in writing to Woodside. Woodside confirms that all feedback relevant to the proposed activity received from GAP to date has been reviewed and incorporated where applicable into the EP. Where appropriate, Woodside has also provided GAP with details of amendments made to the EP, including any updated or additional controls, throughout consultation.
 - Woodside further stated it has followed the requirements of the Environment Regulations in providing consultation information and communication to all relevant persons including continuing to accept feedback on all of its activities during EP development and across the life of the EP.
 - Regarding GAP's claim they had not been provided with sufficient information to respond to Woodside's latest correspondence; had not been provided with the additional information requested, and that Woodside had discouraged two-way consultation, Woodside referred GAP to Woodside's email sent to GAP on 17 March 2023, which contained a detailed table of responses to address their previous specific claims and objections regarding the proposed activity, where appropriate.
 - In response to GAP's claim that Woodside has failed to demonstrate compliance with reg 11A (2), Woodside stated it has assessed the information in GAP's correspondence that describes GAP's functions, interests and activities and how these may be affected by the proposed activity, along with any objections or claims raised by GAP and that this has been assessed against the comprehensive impact and risk assessment undertaken for the proposed activity.
 - In response to GAP's statement that GAP requires a thorough understanding of the potential environmental risks and impacts posed by the proposed activities within the EP and the mitigation actions proposed by Woodside, Woodside stated where appropriate, Woodside had previously provided specific technical information at GAP's request relating to impacts and risks and the management measures to allow GAP to make an informed assessment of the possible consequences of the proposed activity on its functions, interests or activities.
 - Woodside responded to GAP's claims regarding to Jasco animal modelling.
 - In response to GAP's request for a copy of the most recent version of the EP, Woodside stated it had provided GAP with the Consultation Information Sheet and a link to the full draft EP publicly available since October 2021 together with technical information relevant to GAP.
 - Woodside stated it had followed the requirements of the Environmental Regulation and provided information where possible.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>GAP has responded and:</p> <ul style="list-style-type: none"> self-identified as a relevant person and requested to be consulted on this EP and other Woodside EPs. requested more information on the activity. <p>GAP claims Woodside has not:</p> <ul style="list-style-type: none"> Consulted with all relevant persons; Adequately evaluated all impacts and risks; Adequately demonstrated that the environmental impacts and risks will be reduced to as low as reasonably practicable; Adequately demonstrated that the environmental impacts and risks will be of an acceptable level; And that the EP is inconsistent with the Blue Whale Conservation Management Plan and threatened species recovery plans; The EP is inconsistent with the principles of ecologically sustainable development, specifically the 'intergenerational principle'. <p>GAP has further responded and provided feedback, objections and claims relating to:</p> <ul style="list-style-type: none"> Consultation Impact and risk identification Routine acoustic emissions from seismic survey equipment, vessels and AUV Accidental Hydrocarbon Release - Vessel Collision Physical presence (unplanned) - interaction with marine fauna Woodside not being a fit and proper Proponent 	<p>Woodside assessed the feedback on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Section 6.6.2 of the EP has been updated with a new control (C.4.6). The control will be implemented in the peak northbound migration season (May and June) and comprises a spotter vessel (with two Marine Fauna Observers onboard) ahead of the seismic vessel to observe for PBWs.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on GAP's functions, interests or activities.</p>

Australian Conservation Foundation (ACF)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 5 September 2022, during the course of preparing this EP, ACF (represented by the Environmental Defender's Office (EDO)) self-identified and raised interest in this EP via correspondence on consultation material it had received from Woodside relating to other Scarborough EPs.
- On 12 September 2022, Woodside responded to ACF / EDO and attached a copy of the Consultation Information Sheet and attached a detailed table of responses to address specific claims and objections raised on the proposed activity, where appropriate.
- On 23 September 2022, Woodside followed up with ACF / EDO via email.
- On 27 September 2022, ACF / EDO responded via email and advised it would like to meet with Woodside to discuss the proposed activity.
- On 29 September 2022, Woodside responded to ACF offering a meeting on 10 October 2022.
- On 5 October 2022, ACF responded and provided its availability to meet via video conference.
- On 11 October 2022, Woodside provided a briefing to ACF via video conference on the proposed activity and the broader Scarborough Project. The briefing covered:
 - Scarborough project overview
 - Description of specific proposed activities (including this proposed activity) along with a map of the OA.
 - Woodside provided responses for ACF's queries regarding the Seismic EP and the respective proposed seismic activities.
 - ACF queried the difference between the Seismic EP OA and the Active Source Area
 - ACF raised not all titles in the OPP are included in the Operational Area/Active Source Area.
 - ACF asked why data from the previous seismic testing undertaken in 2004 be utilised? And what is gained from another seismic activity – which wasn't captured in previous testing.
 - ACF queried if the material updates to the version of the Seismic EP currently on the NOPSEMA site?
 - ACF provided feedback about the consideration of lower-impact technological alternatives.
 - ACF provided feedback and claims about perceived impacts on marine fauna:
 - The potential seismic activity to take place during pygmy blue whale migration periods.
 - Concerns around humpback whales being impacted by seismic activities as noted in studies undertaken by Dunlop (2017).
 - Negative impacts should be mitigated entirely, rather than avoided.
 - Acoustic pollution and negative impacts on whale calves
 - ACF provided feedback on the cumulative impacts of seismic and the proposed Scarborough Project more broadly.
 - Woodside addressed ACF's questions in relation to the activity scope and scale:
 - Woodside referred to Section 3.4.1 of the publicly available EP (Revision 0), referencing the definition of the Activity Source Area.
 - Woodside advised discharge of the seismic source during vessel run ins, run outs, soft starts and full fold seismic data acquisition will occur in the Activity Source Area. Seismic source testing will also occur in the Activity Source Area. The seismic source will not be discharged within this buffer.
 - Woodside referred to Section 3.4.2 of the EP (Revision 0), referencing the definition of the Operational Area. The seismic source will not be discharged within this buffer.
 - Woodside advised the Woodside-operated Petroleum Titles relevant to this PAP are listed in table 3-1 of this EP (Revision 0).
 - Woodside confirmed the latest version of the EP has been updated to include WA-63-R in Table 3-1, as it was inadvertently omitted from this table in Revision 0.
 - Woodside noted the PAP will be carried out under an access Authority which authorises an existing Petroleum Title Holder to carry out petroleum exploration or recovery operations, other than drilling a well, outside of the boundary of their existing titles.
 - Woodside advised the Activity Source Area and Operational Area show a buffer around the Woodside-operated Title(s) to enable full imagery and understanding of the entire Scarborough plus Jupiter reservoirs, which were not included in the original surveys.
 - Regarding the previous seismic testing data, Woodside referred to its correspondence sent on 12 September 2022.
 - Woodside advised that since Revision 0 the EP has been updated through successive revisions in response to feedback from NOPSEMA and stakeholders and shows examples of how feedback has been considered. Woodside confirmed that no material changes have been made to the location, duration or activity as described in the original EP, with the scope being narrowed over time as project definition is refined. Woodside provided an example of the decision to remove AUV seismic nodes from the PAP, which is reflected in subsequent versions of the EP.
 - Regarding the consideration of lower impact technological alternatives, Woodside referred to its correspondence sent on 12 September 2022.

<p>Woodside addressed ACF's claims in relation to impacts on marine fauna:</p> <ul style="list-style-type: none"> ▪ The Activity Source and Operational Areas for the seismic survey, while within the distribution range for pygmy blue whales, are outside the migration BIA and that it is also not in an area where foraging or resting is likely to take place. ▪ The activity does not overlap BIAs for any other marine mammal species. ▪ The likelihood of encountering pygmy blue whales and other cetaceans is expected to be low, even if the timing overlaps peak periods for northbound and southbound migration. ▪ The Active Source Area is located ~25km from the western boundary of the migration BIA and the results of satellite tracking studies showed that out of a total of 20 pygmy blue whales tagged and tracked during these studies there was only one individual migrating north that travelled to the west of the migration BIA. • Woodside referred to Section 6.6.2 (Revision 0) of the EP includes EPBC Act Policy Statement 2.1 art B.6 – Adaptive Management Measures to minimise potential impacts on pygmy blue whales from seismic noise, which will be triggered if encounters are more frequent than expected. • Woodside confirmed the seismic survey vessel maintains a constant upper speed of 5 knots which largely dictates the speed of escorting and chase vessels accompanying it. In addition, the vessels adopt go-slow buffers around marine fauna as per EPBC Regulations 2000 Part 8 Division 8.1 Interacting with cetaceans (C15.1). ▪ Additionally, Woodside provided a list of the controls in the EP to manage this risk to an ALARP and acceptable level. • Woodside advised that as a precautionary approach, it has included an additional control (C 4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the EP. ▪ Woodside advised the Activity Source and Operational Areas are located a significant distance (138km) to the west of the humpback whale migration BIA. Woodside confirmed that Telemetry data from satellite tracking of northbound and southbound migrating humpback whale has confirmed the migratory pathways are within the continental shelf waters of the North-West Shelf. The location, distribution, and movement of humpback whales documented in the North-West Marine Region show that it is unlikely that migrating humpback whales will be encountered at any time of the year within the area of the proposed activity. • Woodside advised the EP (Revision 0) includes application of the EPBC Act Policy Statement 2.1 Part A standard management procedures to minimise the impacts to all cetaceans including humpback whales. • Additionally, Woodside provided a list of the controls in the EP to manage this risk to an ALARP and acceptable level. • Woodside also referred to the additional control added (C 4.6) Application of EPBC Policy Statement 2.1 Part B.3 – Use of additional vessels to detect presence of cetaceans (spotter vessel). ▪ Woodside referred to section 2.6 of the EP (Revision 0) which describes Woodside's approach to addressing the risks and impacts associated with its activities. • This includes the application of international guidance in decision support, calibration and the hierarchy of controls which preferences elimination of risks and impacts over mitigative controls. The application of these tools results in a demonstration that each identified risk and impact is minimised to an ALARP level, as described in section 2.72 of the EP (Revision 0). ▪ Regarding Acoustic pollution and negative impact on humpback whales, Woodside referred to section 6.5.3 of the EP which describes potential impacts of acoustic emissions on cetaceans. Woodside also referred to its correspondence on 12 September 2022. • Woodside addressed ACF's claims in relation to cumulative impact assessment. ▪ Woodside referred its correspondence on 12 September 2022. 	<p>Summary of Feedback, Objection or Claim</p> <p>ACF has met with Woodside and provided additional consultation information on the broader Scarborough activities, including this proposed activity. ACF has provided feedback, objections and claims relating to:</p> <ul style="list-style-type: none"> • The activity scope and scale • Alternative technologies (lower impact) • Perceived impacts on marine fauna • Cumulative impact assessment. <p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p> <p>Environment Plan Controls</p> <p>Woodside has consulted ACF in the course of preparing this EP. Woodside has assessed the claims or objections raised by ACF. No additional measures or controls have been put in place. Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on ACF's functions, interests or activities.</p>
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The Wilderness Society (TWS)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 16 September 2022 Woodside emailed TWS advising of the proposed activity and provided a Consultation Information Sheet.
- Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the TWS public website.
- Woodside extended an opportunity to meet to discuss the proposed activity.
- On 21 September 2022, TWS emailed Woodside seeking an opportunity to meet in relation to the proposed activity.
- On 23 September 2022, Woodside emailed TWS to confirm it is able to offer a meeting on 27 or 28 September 2022.
- Woodside received an out of office reply and subsequently offered to meet on 3 October 2022.
- On 29 September 2022, TWS emailed Woodside and requested alternative options for meeting dates.
- On 30 September 2022, Woodside emailed TWS requesting it propose a suitable date to meet.
- On 30 September 2022, TWS emailed Woodside requesting to meet on either 6 or 7 October 2022.
- On 3 October 2022, Woodside emailed TWS confirming its availability to meet on 6 October 2022.
- On 3 October 2022, TWS emailed Woodside and confirmed the 6 October 2022 meeting time.
- On 4 October 2022, Woodside emailed TWS acknowledging its confirmation and advising it would receive a meeting invite.
- On 6 October 2022, Woodside provided a briefing to TWS on the proposed activities and the broader Scarborough Project. The briefing covered:
 - Scarborough project overview.
 - Description of specific proposed activities (including this proposed activity) along with a map of the OA.
- On 17 October 2022 Woodside emailed TWS:
 - Woodside attached a meeting summary which included responses to address specific claims and objections raised on the proposed activity, where appropriate. The following topics were covered relevant to the broader Scarborough activities, including this proposed activity.
 - The decision to consult TWS with regard to Woodside's proposed activities for the purpose of understanding how Woodside may mitigate any adverse impacts its activities may have on The Wilderness Society's functions, interests and activities.
 - The work undertaken to understand marine fauna populations and their migration patterns in relation to Woodside's proposed activities and the controls in place to mitigate any potential impacts, including, but not limited to, acoustic surveillance and marine fauna observers.
 - In response to questions raised by TWS during the meeting regarding perceived environmental impacts, Woodside confirmed that:
 - A significant number of scientific studies and findings informed the Scarborough OPP and subsequent EPs, including Woodside-supported studies undertaken by the Australian Institute of Marine Science and The University of Western Australia
 - Scientific studies and modelling were also used to inform the impact assessment in relevant EPs which demonstrate the activities (i.e., seismic acquisition) will be performed in a manner that prevents injury to whales, and minimises the potential for biologically significant behavioural disturbance
 - Continuous consideration of cumulative impacts for the proposed activities under each EP, as was previously considered for the OPP, and
 - Regarding TWS's queries in relation to Woodside's engagement with Traditional Owners on the relevant EPs, Woodside confirmed it has undertaken extensive engagement with the relevant Traditional Owners and Traditional Owner representative groups with respect to the proposed activities. Woodside confirmed this engagement included archaeological and ethnographic surveys, which have informed the Scarborough EPs.
 - In relation to TWS's query regarding zooplankton and any potential impacts from the proposed activities on the broader food chain, Woodside confirmed scientific studies and modelling have been used to assess and ensure an ALARP and acceptable approach to activities.
 - Woodside noted that no new concerns or queries have been raised by TWS directly to Woodside that have not already been addressed by Woodside in each of the EPs discussed.
 - Noting TWS's more general interest in carbon offsets, biodiversity and native vegetation, though outside of the scope of the Scarborough Project consultation, Woodside would welcome the opportunity for TWS to meet with subject matter advisers from Woodside to discuss the work that is being undertaken in this space.
- On 19 October 2022, Woodside received correspondence from TWS via NOPSEMA dated 14 October 2022 that contained a number of claims/objections and requests for information relating to the proposed activity.
 - Woodside's current methodology and application regarding offset (carbon and biodiversity), in response to the proposed activities.
 - Any remuneration or business unit KPIs to the progression of the Environmental Plan or the commencement of the related activities.
 - Confirmation that the development of a cumulative/holistic impact assessment covers the full breadth of the development, production and decommissioning activities.
 - An outline of how dissenting scientific or technical expertise to Woodside's proposal was identified, actively sought and considered in the EP.
 - Contemporary approaches to reducing the outstanding issues arising from views regarding the impacts of seismic survey activity on zooplankton population (particularly as cited by McCauley et al. (2017) and recommended by the Senate Inquiry.
 - Woodside's current and proposed investment in alternative or lower-impact technological innovations to seismic surveying.

<p>Summary of Feedback, Objection or Claim</p>	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p>	<p>Environment Plan Controls</p>
<p>Woodside has received feedback from TWS during the course of consultation on a range of Woodside EPs covering the broader Scarborough activities. TWS has provided feedback, objections or claims about the proposed activity, and the broader Scarborough project relating to:</p> <ul style="list-style-type: none"> • Consultation process • Industry funding, support or influence on scientific studies • Carbon and biodiversity offsets • KPIs and remuneration relating to EP process and completion • Impacts of seismic surveys • Previous seismic surveys 	<p>Feedback has been assessed on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate. Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on TWS's functions, interests or activities.</p>

Say No to Scarborough Gas (SNTSG)

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in **Section 5.8** and below.

Summary of information provided and record of consultation:

- On 16 September 2022 Woodside emailed SNTSG advising of the proposed activity and provided a Consultation Information Sheet.
- Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the SNTSG public website relating to Climate change and GHG and Rock art and Aboriginal cultural heritage.
 - Woodside confirmed that the concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Seismic EP.
 - Woodside advised the Seismic EP assesses both direct and indirect environmental impacts and risks associated with the PAP, having regard to the nature and scale of the PAP. The extraction of Scarborough gas for onshore processing is not included in the PAP for this EP. Therefore, indirect impacts and risks arising from onshore processing of Scarborough gas are not considered indirect impacts/risks of this PAP but will be considered in relevant Scarborough EPs as appropriate.
 - Woodside advised that Routine Atmospheric and GHG emissions associated with the seismic activity have been added to Section 6.7.2 of the revised EP. This includes an additional control that requires the evaluation of tenders for the project will include consideration of vessel fuel usage / emissions and low carbon / alternative fuels (C.8.2).
 - Woodside confirmed that activities covered by this EP are located ~374km away from Murujuga and will have no impact on access to sites of cultural and spiritual significance. Woodside also confirmed there would be no impact from emissions or rock art displacement and that damage to heritage sites is not anticipated.
 - Woodside advised it has undertaken archaeological assessments and ethnographic surveys to identify cultural heritage that may be impacted by the Scarborough development. These works have not identified any heritage places, objects or values which will be impacted by the activities covered in this EP.
- Woodside extended an opportunity to meet to discuss the proposed activity.
- On 23 September 2022 Woodside followed up with SNTSG via email.
- On 29 September 2022 SNTSG emailed Woodside requesting more time to provide feedback and asked for a copy of the current version of the EP.
 - SNTSG advised its availability to meet with Woodside to discuss the EP.
- On 4 October 2022 Woodside emailed SNTSG confirming its availability to meet on 10 October 2022.
- On 5 October 2022, SNTSG emailed Woodside advising it was unavailable to meet on 10 October 2022 and requested to meet on 13 October 2022.
- On 6 October 2022 Woodside emailed SNTSG confirming its availability to meet on 13 October 2022.
- On 11 October 2022 SNTSG emailed Woodside in response to other Scarborough EP consultation and referenced that its focus of the scheduled meeting on 13 October 2022 was to discuss a separate specific proposed Woodside activity.
 - SNTSG noted that more information about all of the EPs will be valued but SNTSG will require more time after the meeting to give feedback and go through a thorough consultation process.
- On 11 October 2022 Woodside emailed SNTSG:
 - Woodside confirmed the purpose of the meeting is to provide context and an overview on the upcoming activities for the Scarborough Project to allow for feedback and information to be provided as relevant.
- Woodside advised it will discuss a number of Scarborough EPs.
 - Woodside encouraged SNTSG to share any interests, claims or concerns it has in relation to these EPs to inform Woodside of appropriate measures it may take to mitigate any adverse impacts Woodside's activities may have.
- On 12 October 2022 SNTSG emailed Woodside and advised: it will endeavour to give as much feedback as possible on the day and as soon as it can after the 13 October 2022 meeting.
- On 13 October 2022, Woodside provided a briefing to SNTSG on the proposed activities and the broader Scarborough Project. The briefing covered:
 - Scarborough project overview
 - Description of specific proposed activities (including this proposed activity) along with a map of the OA.
 - During the meeting SNTSG noted it will provide Woodside, early in the week commencing Monday, 17 October 2022, with a summary of concerns it has in relation to the relevant EPs.
 - During the meeting, SNTSG asked questions and provided feedback regarding:
 - The purpose of the seismic survey, specifically why data cannot be used from previous seismic testing undertaken in 2004. SNTSG asked what is gained from another seismic activity? Is the survey required due to the time that has passed since the last survey, and what is the minimum acceptable time between surveys?
 - Activity timing, specifically the timing of the proposed activity, timing of other surveys to ensure they do not take place at the same time.
 - SNTSG noted the fact sheet is out of date from May 2021, and asked of there has been material changes to the EP.
 - Activity location, regarding the activity source area size against the WA-61-L title and difference between the EP operational area and activity source area, and titles inclusion in the operational area and active source area.
 - Underwater noise, regarding impact on marine species. SNTSG requested an expert opinion on impacts.
 - Impacts of the activity on pygmy blue whales
 - Impacts of cyclones on the activity and union consultation on potential cyclone risk
 - Impacts on zooplankton and the marine food chain
 - Whale shark strike risk regarding vessel speeds over 10 knots
 - Light emissions, specifically what results have been determined from assessments undertaken on artificial light
- On 14 October 2022 Woodside emailed SNTSG:
 - Woodside acknowledged the EPs discussed during the meeting and noted the date of week commencing 17 October 2022 for SNTSG to provide feedback.
 - At the request of SNTSG, Woodside resent the consultation information sheet as SNTSG mentioned it had not yet received it. Woodside confirmed that it emailed SNTSG and sent the consultation information on 30 September 2022.
 - Woodside encouraged SNTSG to visit the Consultation Activities page of the Woodside Energy website, where all Consultation Information Sheets can be located, and to sign up to the mailing list on the Consultation Activities page, enabling it to receive notifications when new Information Sheets are released.

- On 19 October 2022, Woodside received correspondence from SNTSG via NOPSEMA dated 29 September 2022 which advised the regulator of the engagements and consultation conducted by Woodside.
- On 16 November 2022, SNTSG emailed Woodside and included a letter. The letter contained a number of claims/objections relating to the proposed activity.
 - SNTSG provided feedback about community consultation:
 - Community consultation, stating there was no information on which communities and community groups would be consulted. Further, there was no information on what the process would be for incorporating feedback and then re-releasing the EPs. SNTSG asked if Woodside will publish it's redrafted EP's
 - Indigenous peoples and communities have strong cultural and spiritual connections to sites within the EPs and would have an interest in management decisions impacting culturally important oceanic fauna. To what extent are they being consulted? Which communities are being consulted? And how is their feedback incorporated into the EPs?
 - Query whether certain groups had been consulted such as Australian Marine Conservation Society and marine tourism operators
 - SNTSG commented it was concerned that project work was well underway, before approvals had been granted, and that parties are acting as though environmental approvals are guaranteed.
 - SNTSG provided feedback about consistency with existing conservation plans or ecological principles:
 - SNTSG claims the plans are not consistent with ecological principles of sustainable development, particularly the intergenerational principle. It asked how Woodside plans to meet these principles.
 - SNTSG asked how the plan is consistent with the Blue Whale Conservation Management Plan and threatened species recovery plans
 - SNTSG provided feedback about independence:
 - SNTSG asked about the skills of the people at the Environmental Risk and Impact identification workshop and their ties to Woodside and any conflicts of interest they hold. SNTSG also asked about the lifetime for identifying environmental risk and impact identification.
 - Regarding environmental impacts and risks being reduced to ALARP, SNTSG asked who is responsible for determining what is reasonably practical and what their ties are to Woodside, and what grounds are the determinants for ALARP based upon (economic or environmental)?
 - SNTSG provided feedback on emissions:
 - Emissions caused by the project are a major concern for SNTSG and it noted the EPs ignore scope 1, 2, and 3 and they cannot be ignored when considering approvals. SNTSG requested more information and figures on the lifetime of emissions of the project and emissions forecasting, consistency with conservation management plans and species recovery plans, Woodside's response to various external reports and sources, CCS and carbon offset planning, emissions projections and Scope 3 emissions.
 - SNTSG provided feedback on lighting:
 - What are the impacts of artificial lights on ecological processes and sea birds? Why are the routine light emissions impacts estimated to have an impact for less than one year? Will Woodside commit to the National Light Pollution guidelines for Wildlife?
 - SNTSG provided feedback on ecosystem impacts:
 - Ecosystem impacts such as effects of climate change on interactions between marine life and the disturbance and pollution caused by the project, ecological parameters used to assess impacts on species / populations etc., the process of the deep-water survey, microbial communities and carrying out work during PBW migration season
 - SNTSG provided feedback on seismic activity:
 - Concern over Woodside's ALARP system. SNTSG asked for definitions about ALARP, and measures taken.
 - Requested an updated version of the information sheet.
 - The need for another seismic survey, why Woodside could not use data collected in 2004?
 - The timing of the activity and overlap of testing and behavioural effects of the activity on species outside of the operational area.
 - Impacts of cyclones on the activity and union consultation on potential cyclone risk
 - SNTSG asked or access to results from animat modelling and details about the decibel level of the seismic blasting.
 - Have expert opinions been sourced regarding exposure experiments and observed behaviours, and whether the experts are part of the community consultation.
 - SNTSG asked Woodside's plans about the impacts on zooplankton
 - SNTSG asked the speed at which the vessels are travelling during the surveys.
 - On 17 March 2023, Woodside emailed SNTSG and included responses to address specific claims and objections raised during the 13 October 2022 meeting, and the 16 November 2023 correspondence regarding the proposed activity, where appropriate.
 - Regarding the purpose of the seismic activity, Woodside provided an explanation as to why the survey must be repeated, as no further uplift can be gained from the 2004, 2010 and 2018 data. Additionally, the original survey does not extend over the full Scarborough gas field or over the Jupiter gas field.
 - Woodside advised that the requirement of the survey is not related to a specific time period between surveys.
 - Regarding the activity timing, Woodside advised details determining the timing of the activity, two years from EP acceptance.
 - Woodside advised the EP (revision 0) contains Control 7.1 requiring a separation distance from any identified concurrent seismic survey to reduce the potential for cumulative impacts.
 - Woodside referred to table 6-11 in the EP (revision 0) which identifies other potential seismic surveys occurring in the region, the closest being 275km away with a four year window execution.
 - Woodside confirmed a revised version of the consultation sheet is available on its website. Since Revision 0, which is available on the NOPSEMA website, the EP has been updated through successive revisions in response to feedback from NOPSEMA and stakeholders. No material changes have been made to the location, duration, or activity, as described in the original document and fact sheet.
 - Regarding the activity location, Woodside advised the Woodside-operated Petroleum Titles relevant to this PAP are listed in table 3-1 of this EP (Revision 0).
 - Woodside confirmed the latest version of the EP has been updated to include WA-63-R in Table 3-1, as it was inadvertently omitted from this table in Revision 0.
 - Woodside noted the PAP will be carried out under an access Authority which authorises an existing Petroleum Title Holder to carry out petroleum exploration or recovery operations, other than drilling a well, outside of the boundary of their existing titles.
 - Woodside advised the Activity Source Area and Operational Area show a buffer around the Woodside-operated Title(s) to enable full imagery and understanding of the entire Scarborough plus Jupiter reservoirs, which were not included in the original surveys.
 - Woodside referred to Section 3.4.1 of the publicly available EP (Revision 0), referencing the definition of the Activity Source Area.

- Woodside advised discharge of the seismic source during vessel run ins, run outs, soft starts and full fold seismic data acquisition will occur in the Activity Source Area. Seismic source testing will also occur in the Activity Source Area. The seismic source will not be discharged within this buffer.
- Woodside referred to Section 3.4.2 of the EP (Revision 0), referencing the definition of the Operational Area. The seismic source will not be discharged within this buffer.
- Regarding underwater noise, Woodside advised the impacts of underwater noise generated by the seismic survey equipment are assessed in the EP Section 6.5.3 and Section 6.5.4 for vessels (Revision 0).
- Woodside advised the impact assessments use peer reviewed literature and scientific studies, supported by activity specific underwater sound program modelling.
- Woodside advised the impact assessments consider a range of receptor groups and provided a list of example groups.
- The impact assessments determined highest potential consequence for these receptors to be 'D' (Minor, short-term impact) for noise from survey equipment and 'F' (No Lasting Effect, localised impact not significant to environmental receptors) for noise from project vessels.
- Woodside referenced a list of controls in the EP (Section 6.5.3, Revision 0) to manage risk to an ALARP and acceptable level.
- Woodside referenced the additional control (C 4.6) (under the application of the EPBC Statement Policy 2.1, Part B.3) in section 6.6.2 of the latest revision of the EP.
- Regarding pygmy blue whales, Woodside provided information about the Active Source and Operational areas of the Scarborough 4D MSS being outside the migration BIA, and accordingly, the likelihood of encountering the pygmy blue whale and other cetaceans is expected to be low.
- The EP includes application of the EPBC Act Policy Statement 2.1 Part B.6 – Adaptive measures to minimise the potential impacts to pygmy blue whales from seismic noise, which will be triggered if encounters with pygmy blue whales are more frequent than suspected.
- Woodside referred to Section 6.6.6 of the EP (Revision 0) which assesses the risk of accidental collision between project vessels and marine fauna, including PBWAs.
- Regarding impacts on zooplankton and the marine food chain, Woodside confirmed that scientific studies and modelling have been used to assess and ensure an ALARP and acceptable approach to activities.
 - Further to Woodside's response in it the meeting, Woodside provided confirmation that the risk assessments in the EP conclude that impacts to zooplankton are likely to be localised (>100 m from the seismic source) and localised changes in zooplankton abundance are likely to be replenished and indistinguishable from natural levels and distributions within hours of the seismic vessel passing.
- Woodside referred to Section 6 of the EP (Revision 0), particularly 6.6.2 Routine Acoustic Emissions from Project Vessels and 6.6.5 Routine Discharges, which consider the potential impacts to zooplankton in the risk/impact assessments.
- Regarding Whale shark and vessel strike risk due to vessel speeds over 10 knots, Woodside confirmed the constant maintained speed of the seismic survey vessel (upper speed of 5 knots). This largely also dictates the speed of both the escorting support and chase vessel. Woodside advised that the vessels also adopt a go-slow buffer around marine fauna as per the EPBC Regulations - Part 8 Division 8.1 Interacting with cetaceans (C14.1).
- Woodside advised the PAP Operational Area does not overlap with any known foraging, feeding or related areas for whale sharks. The nearest BIA is 136 km south-east from the Operational Area.
- Woodside referred to Section 6.7.6 of the EP (revision 0) which assesses the risk of vessel collision or entanglement with marine fauna. While contact with whale sharks is not considered credible as part of this risk assessment, the EP does require implementation of Control 14.1 which includes the requirement that "vessels will not travel faster than eight knots within 250m of whale shark and not allow the vessel to approach closer than 30m of a whale shark.
- Regarding light emissions and assessments undertaken, Woodside referred to Section 6.5.7 (Revision 0) of the EP which considers Routine Light Emissions associated with External Lighting on Project Vessels.
- Woodside advised in the latest revision of the EP, receptors that have important habitat within a 20km radius of the Operational Area were considered as part of the impact assessment, based on recommendations of the Natural Light Pollution Guideline for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds. The impact assessment determined that light emissions from project vessels will not result in an impact greater than localised and temporary disturbance to marine fauna in the vicinity of the Operational Area, with no lasting effect to any species.
- Regarding community consultation, Woodside advised that consultation requirements as set out in Reg 11A of the Environmental Regulations have been complied with in relation to the consultation process for EPs Woodside detailed during its consultation meeting with SNTSG on 13 October 2022.
 - Where feedback is received which informs Woodside of new risks or measures that it may take to mitigate the potential adverse environmental impacts from the PAP, Woodside incorporates this feedback into the EP, and where appropriate will introduce additional controls to ensure risks are managed to an ALARP and an acceptable level.
- Woodside confirmed that the PAP of the EP remains the same as what is included in the Consultation Information Sheets. Woodside advised that after publishing to the NOPSEMA website, EPs may change whilst under assessment prior to the final EP being accepted. Following the initial public comments period, an additional round of stakeholder Consultation Information Sheets and advertisements in local publications were issued during the development of the EP.
- Woodside advised it has undertaken extensive consultation with relevant Traditional Owners and Traditional Owner representative groups with respect to the proposed activities.
- Woodside confirmed the engagement included archaeological and ethnographic surveys, which have informed the Scarborough EPs.
- Woodside confirmed it has not undertaken any of the activities which are subject of environmental approvals which are currently under assessment.
- Regarding consistency with existing conservation plans or ecological principles, Woodside confirmed the PAP is carried out in a manner consistent with the principles of ecological sustainable development.
- Woodside advised it confirmed with SNTSG during the consultation meeting on 13 October 2022 that proposed activities are consistent with the Blue Whale Conservation Management Plan.
- Woodside also confirmed that Table 6-21 and Demonstration of Acceptability in Section 6.5.3 in the EP (Revision 0) provides the assessment of the relevant activities against the Blue Whale Conservation Management Plan.
- Regarding independence, Woodside confirmed the experience of the participants in the Environmental Risk and Impact Identification Workshop, which included external environmental consultants supporting the EP development. Woodside referred to Table 2-3 of the EP (Revision 0) for a summary of duration for identifying environmental risk and impacts.
- Regarding responsibility for determining what is reasonably practicable and ties to Woodside, Woodside confirmed the details are provided in Sections 2.2, 2.3 and 2.7.2 of the EP (Revision 0).
- Regarding emissions and ecosystem impacts, Woodside advised that concerns relating to carbon and the impact on climate change from Scarborough gas are not relevant to the EP. The EP assesses both direct and indirect impacts and risks associated with the PAP, having regard for the nature and scale of the PAP.
- Woodside also advised the extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the EP, therefore indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered those of the PAP for the EP but may be evaluated in other Scarborough EPs as appropriate.
- Woodside also confirmed that Section 6.7 of the EP (Revision 0) Recovery Plan and Threat Abatement Plan Assessment describes the assessment that Woodside has undertaken to demonstrate that the PAP is not inconsistent with any recovery or threat abatement plans. Woodside referred to Table 6-19 for more information.
- Woodside advised that the various external comments provided by SNTSG are not applicable to the activity which is the subject of the EP.
- Regarding ecosystem impacts, Woodside advised that impacts to all relevant ecological parameters are considered in the risk/impact assessments in Section 6 of the EP (Revision 0).
- Woodside advised the deep-water environment surveys are not relevant to the EP, and information in the EP is drawn from Bryce et al, 2015.
- Woodside referred to Section 4.5 (Revision 0) of the EP for information on the habitats and biological communities in the Operational Area.

<ul style="list-style-type: none"> ▪ Woodside referred to Sections 6.5.3 and 6.5.4 of the EP (Revision 0) which contain an ALARP assessment of the controls to reduce seismic and vessel noise. Regarding seismic activity Woodside referred to the ALARP assessments in Section 6 of the EP (Revision 0) and several previous responses provided above. ▪ Regarding the activity timing, Woodside confirmed that as advised in the consultation meeting on 13 October 2022, it plans to undertake the activity as soon as possible, following regulator acceptance. ▪ Regarding cyclone risk and consultation, Woodside referred to its previous responses, as well as Section 7.12 Severe Weather Preparation of the EP (Revision 0). ▪ Woodside referred to Table 6-7 of the EP (Revision 0) for result from the animal modelling. ▪ Regarding seismic blasting, Woodside referred to Section 6.5.3 of the EP (Revision 0). 	<p>Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response</p> <p>Woodside assessed the feedback on merit as it applies to this EP and a summary of responses has been provided to address specific claims and objections raised on the proposed activity, where appropriate.</p> <p>Woodside has assessed claims and objections raised on the SNTSG public website that cover topics relevant to the proposed activity, where appropriate and provided responses to SNTSG (shown above).</p> <p>Woodside has provided specific information from the EP to address feedback, objections and claims, as well as Woodside's consultation approach and methodology to identify relevant persons (see Section 5.7).</p> <p>No amendments have been made to the EP in relation to any of the feedback, objections or claims raised. Woodside has provided responses to feedback received as shown above.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Environment Plan Controls</p> <p>Woodside has consulted SNTSG in the course of preparing this EP. Woodside has assessed the claims or objections raised by SNTSG. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on SNTSG's functions, interests or activities.</p>
<p>-Summary of Feedback, Objection or Claim</p> <ul style="list-style-type: none"> • Following a briefing with Woodside, SNTSG has provided feedback, objections and claims relating to: <ul style="list-style-type: none"> • Assessment of climate change from activity • Rock art and Aboriginal cultural heritage • Purpose of the seismic survey (use of the 2004 data) • Activity timing • Activity location • Underwater noise • Pygmy blue whales • Impacts of cyclones on the proposed activity and union consultation • Impacts on zooplankton • Whale shark and vessel strike risk • Light emissions • Community consultation • Consistency with existing conservation plans and ecological principles • Independence • Emissions • Lighting • Ecosystem impacts • Seismic activity 	<p>Australian Marine Conservation Society (AMCS)</p> <p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> • On 16 September 2022 Woodside emailed AMCS advising of the proposed activity and provided a Consultation Information Sheet. • Woodside also provided an attached statement of response to claims and objections raised by topic on the AMCS public website relevant to the proposed activity. • Woodside extended an opportunity to meet to discuss the proposed activity. • On 23 September 2022, Woodside followed up with AMCS via email. • On 10 October 2022, Woodside followed up with AMCS via email and confirmed no response had been received. • On 11 October 2022, AMCS emailed Woodside and advised that it was unable to make a submission before 30 September 2022 due to the large number of consultations it is involved with and needs to prioritise its limited resources at this time. AMCS requested for Woodside to continue to send notifications and reminders of its consultations. 	<p>Environment Plan Controls</p> <p>Woodside has consulted SNTSG in the course of preparing this EP. Woodside has assessed the claims or objections raised by SNTSG. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on SNTSG's functions, interests or activities.</p>

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside has assessed claims and objections raised on the AMCS public website that cover topics relevant to the proposed activity, where appropriate and provided responses to AMCS (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Sea Shepherd Australia (SSA)		
Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.		
Summary of information provided and record of consultation: <ul style="list-style-type: none"> • On 16 September 2022, Woodside emailed SSA advising of the proposed activity and provided a Consultation Information Sheet. • Woodside also provided specific information relevant to the proposed activity based on the claims and objections raised on the SSA public website. • Woodside extended an opportunity to meet to discuss the proposed activity. • On 23 September 2022, Woodside followed up with SSA via email. • On 10 October 2022, Woodside followed up with SSA via email and confirmed no response had been received. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
No feedback, objections or claims received despite follow up.	Woodside has assessed claims and objections raised on the AMCS public website that cover topics relevant to the proposed activity, where appropriate and provided responses to AMCS (shown above). Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).	No additional measures or controls are required.
Other		
and/or, [redacted] and/or Save Our Songlines		

Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.

Summary of information provided and record of consultation:

Historical Engagement

2018 – September 2022

Woodside has engaged with the Ngarluma and Mardudhunera communities on the Scarborough project since 2018 through their representative organisations including Murujuga Aboriginal Corporation, Yaburara and Coastal Mardudhunera Aboriginal Corporation, Wirrawandi Aboriginal Corporation and Ngarluma Aboriginal Corporation. During these two-way discussions, in three years leading up to November 2021, Woodside was not made aware of any specific concerns of [REDACTED] (Mardudhunera Traditional Owners) and [REDACTED] (Ngarluma Traditional Owner) around the Scarborough Project. The first time Woodside became aware of these concerns was via a number of public statements on Save Our Songlines websites and social media (November 2021).

- After seeing the concerns, Woodside has met or attempted to meet with individuals involved in Save Our Songlines to discuss the Scarborough project area in other capacities on numerous occasions, including:
 - On 15 December 2021, a meeting was held with MAC Board and Circle of Elders, including [REDACTED] to provide a project overview of Scarborough and Pluto Train 2 projects at the MAC office in Dampier.
 - On 23 March 2022, Woodside received an email from [REDACTED] on behalf of [REDACTED] and [REDACTED] which contained an open letter signed by several Traditional Custodians requesting a halt to progress on the Scarborough Project.
 - An online meeting with [REDACTED] and [REDACTED] was arranged for 24 March 2022 but did not proceed due to technical issues.
 - On 24 March 2022, Woodside emailed [REDACTED] and Save Our Songlines relating to an attempted virtual meeting on 24 March 2022:
 - Woodside noted that despite its representatives being online and waiting for 35 minutes, the meeting did not proceed due to technical issues.
 - Woodside advised that it remained keen to understand Traditional Custodian concerns, including those matters that [REDACTED] and Save Our Songlines have set out, and that Woodside remained available to meet.
 - On 24 March 2022, [REDACTED] and Save Our Songlines emailed Woodside to advise that:
 - They were waiting to join the virtual meeting but there was no response.
 - They were disappointed at this outcome and hoped to have a more formal meeting in times to come.
 - Emails exchanged later that day extended the offer to hold further meetings. By this stage, there had been four attempts by Woodside to meet and discuss these issues with [REDACTED]. This is in addition to the previous three years of consultation with Traditional Owner representative groups of which [REDACTED] were members.
 - On 6 June 2022, some seven months after Save Our Songlines had launched its public campaign on social media, [REDACTED] and Save Our Songlines emailed Woodside and attached a letter regarding consulting NOPSEMA assessment of Scarborough offshore gas field development. The letter summarised the following claims and objections relating to the broader Scarborough activities as follows:
 - We assert our rights to be consulted as 'relevant persons' in relation to cultural heritage impacts of the Scarborough gas development according to the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009;
 - Given the lack of previous assessment of cultural heritage impacts and the significant uncertainties regarding these impacts a precautionary approach must be taken according to the ESD Principles in Section 3A of the EPBC Act.
 - Direct and indirect impacts on cultural heritage must be assessed now, and for all stages of the Scarborough development according to Section 527E of the Environmental Protection and Biodiversity Conservation (EPBC) Act and the EPBC Act Indirect Consequences Policy.
 - In order to comply with requirements to consult under the regulations, disclosure of certain information is required from Woodside.
 - Woodside's own policy, the UNDRIIP and other frameworks require that Traditional Owners are provided with the right of free, prior and informed consent regarding any cultural heritage impacts.
 - The Murujuga Aboriginal Corporation does not represent the interests of Traditional Owners seeking to protect cultural heritage and Woodside's limited consultation with MAC does not satisfy the requirement for free, prior and informed consent for cultural heritage impacts, or the requirements of 'relevant person' consultation according to the above regulations.
 - After consulting with the correspondence was an open letter signed by several Traditional Custodians requesting (among other things) that further investment on project on Murujuga be withheld and that any further investments decisions on the Scarborough Project be paused. The letter was titled 'Open letter from Traditional Owners and Custodians of Murujuga concerning the proposed Woodside Scarborough gas development'.
 - On 22 July 2022, Woodside sent [REDACTED] and Save Our Songlines a letter regarding this EP.
 - Throughout July and August 2022, Ngarluma and Yindjibarndi Foundation Ltd (NYFL) offered to engage [REDACTED] and [REDACTED] and to facilitate a series of up to three meetings between Woodside and [REDACTED] and [REDACTED] to discuss Scarborough and Pluto Train 2 project and activities. Woodside pursued this opportunity, including outlining payment for [REDACTED] and [REDACTED] time, but it did not progress, due to lack of responses from [REDACTED] and [REDACTED]
 - On 2 August 2022, Woodside provided acceptance in writing of NYFL offer to facilitate Save our Songlines meetings.
 - On 26 September 2022, [REDACTED] and Save Our Songlines emailed a letter to NOPSEMA regarding a number of Scarborough EPs, including this one:
 - [REDACTED] and Save Our Songlines raised several claims relating to Woodside's consultation requirements under the Regulations.
 - [REDACTED] and Save Our Songlines raised that they have functions interests and activities within the EMBA's of the Scarborough EPs (including this EP) which might be directly affected by the proposed activity.
 - [REDACTED] and Save Our Songlines requested NOPSEMA to refrain from accepting the Scarborough EPs (not this EP) until Woodside had properly complied with Reg 11A in relation to its functions, interests and activities.
 - On 29 September 2022, Woodside emailed [REDACTED] and Save Our Songlines:
 - Woodside requested a meeting to share information in relation to the Scarborough Gas Project. Woodside requested to hold this meeting prior to 10 October 2022.
 - Woodside advised it welcomed the opportunity to meet to discuss the matters raised in the letters of 6 June 2022 and 29 September 2022, to share information in relation to the Scarborough Gas Project and demonstrate how items raised in the correspondence have been addressed in the relevant environment plans.
 - Woodside proposed that the meeting would be attended by subject matter experts and project personnel as required to answer any questions.
 - On 6 October 2022, Woodside followed up with [REDACTED] and Save Our Songlines via email and phone / voicemail.
 - On 7 October 2022, [REDACTED] and Save Our Songlines responded to Woodside via phone to arrange a suitable date and time.
 - On 7 October 2022, Woodside and [REDACTED] and Save Our Songlines discussed arrangements via phone to meet on 11 October 2022.
 - On 7 October 2022, [REDACTED] and Save Our Songlines contacted Woodside via phone to advise that a colleague would be in touch to set up the meeting. [REDACTED] and Save Our Songlines could not confirm if the 11 October 2022 meeting was proceeding as planned.
 - On 10 October 2022, Woodside emailed [REDACTED] and Save Our Songlines noting it had not received any further contact confirmation of the 11 October 2022 consultation meeting. Woodside advised it was still ready and available to proceed with a meeting.

- On 11 October 2022, Woodside sent personnel to Karratha in preparation for the meeting and followed up with [REDACTED] and Save Our Songlines via phone and SMS.
- On 11 October, [REDACTED] and Save Our Songlines advised Woodside via SMS that it was awaiting confirmation from its lawyers regarding the proposed meeting.
 - Woodside did not receive further contact and this meeting did not proceed.
 - Woodside received correspondence from [REDACTED] and Save Our Songlines via NOPSEMA which was directed to Woodside and dated 8 November 2022:
 - The correspondence acknowledged Woodside's invitation to meet to discuss the Scarborough Environment Plans and proposed some alternative meeting dates.
 - The correspondence referenced prior correspondence between Woodside and [REDACTED] and Save Our Songlines.
 - The correspondence referenced a number of other related Scarborough Gas Project Environment Plans.
 - On 22 November 2022, Woodside emailed [REDACTED] and Save Our Songlines:
 - Woodside acknowledged the letter addressed to Woodside on 8 November 2022 that was passed on via NOPSEMA.
 - Woodside confirmed its availability to meet on Tuesday 29 November 2022.
- On 8 November 2022, [REDACTED] and Save Our Songlines sent a letter to Woodside in relation to the Scarborough gas project EP meetings request including this EP.
- On 22 November 2022, Woodside emailed [REDACTED] and Save Our Songlines regarding 8 November 2022 correspondence.
- On 24 November 2022, [REDACTED] and Save Our Songlines provided correspondence to Woodside regarding the proposed meeting date. The correspondence sought to clarify the intended scope and purpose of the meeting before setting a date. In particular [REDACTED] and Save Our Songlines sought confirmation on the following items:
 - Acknowledgement of relevant person status
 - Provision of necessary information
 - Purpose of meeting
- On 2 December 2022, Woodside emailed [REDACTED] and Save Our Songlines and included responses to address the items raised on 24 November 2022, where appropriate. Woodside reiterated its availability to meet and provided an option for any date in December 2022.
 - Woodside reiterated that it is open to continue consulting, receiving feedback and discussing concerns in relation to Woodside's Scarborough Environment Plans (EPs). Consultation is ongoing and feedback will continue to be accepted throughout the life of the EP, including while it is being prepared, while it is under assessment as well as after acceptance, while the EP remains in force.
 - Woodside confirmed its arrangements to meet and consult that have been ongoing since November 2021, and it remains open to continue consulting in relation to the Scarborough EPs.
 - Woodside advised it is available to meet with [REDACTED] and Save Our Songlines on any date in December 2022 in Karratha. Woodside requested confirmation of availability to meet by 9 December 2022.
 - Woodside provided a link to the Consultation Information Sheet, which has been available on Woodside's website since September 2022, invited comments on the proposed activities to be provided before 21 October 2022. This EP is in development, and we are seeking your feedback to assist in its preparation.
 - Woodside noted there has been ample time and information available to inform feedback on our proposed Scarborough EPs. Woodside requested [REDACTED] and Save Our Songlines provide feedback no later than at the proposed meeting in December 2022.
 - Woodside noted the letter dated 24 November 2022 makes reference to arrangements which would enable [REDACTED] and Save Our Songlines to share relevant information such as matters that are restricted to women or men only. Woodside requested for [REDACTED] and Save Our Songlines to confirm what arrangements are required to enable them to share this information by 9 December 2022.
- Despite Woodside being available to meet any time in December and the date of December 9 being suggested, there was no response from [REDACTED] and Save Our Songlines so a meeting could not proceed.
- On 4 January 2023, Woodside emailed [REDACTED] and Save Our Songlines to follow-up on its meeting request (Appendix F, reference 1.105). Woodside reiterated its availability to meet and provided an option for any date in January 2023.
- On 13 January 2023, [REDACTED] and Save Our Songlines emailed Woodside:
 - [REDACTED] and Save Our Songlines confirmed it would like to meet with Woodside, but reiterated its requests contained within its 24 November 2022 correspondence.
 - [REDACTED] and Save Our Songlines stated it can advise of its availability for a meeting once the information requested above is provided.
- On 19 January 2023, Woodside emailed [REDACTED] and Save Our Songlines. Woodside included the following responses to address the items raised, where appropriate:
 - Woodside reiterated it is open to continue consulting with [REDACTED] and Save Our Songlines, receiving feedback and discussing their concerns in relation to Woodside's Scarborough Environment Plans (EPs) in Commonwealth and State waters (collectively referred to as the Scarborough EPs).
 - That consultation on the Scarborough EPs began when Woodside provided [REDACTED] and Save Our Songlines with consultation information on the Scarborough EPs.
 - That Woodside has made every effort to meet with [REDACTED] and Save Our Songlines to understand their claim of relevance and to develop a comprehensive understanding of potential impacts to their functions, interests or activities.
 - That it has been trying to arrange a meeting with [REDACTED] and Save Our Songlines since November 2021 to discuss the Scarborough EPs, including a representative travelling to Karratha for a planned meeting on 11 October 2022 and making representatives available for a meeting on 29 November 2022.
- Woodside reiterated its availability to meet and provided an option for any date in January or early February 2023.
- On 8 February 2023, Woodside was copied into correspondence sent from the Environmental Defender's Office (EDO) to the WA State Minister for Mines and Petroleum regarding a separate Environment Plan under State Regulations. Copies of previous correspondence between Woodside and [REDACTED] and Save Our Songlines were attached to the email.
- On 8 February 2023, the EDO (acting on behalf of SOS) emailed Woodside and provided a proposed date of the w/c 13 and 20 March 2023 for the meeting with its client.
- On 15 February 2023, Woodside emailed [REDACTED] and Save Our Songlines. Woodside reiterated its availability to meet and, based on dates suggested within the 8 February correspondence, provided [REDACTED] and Save Our Songlines with confirmation it was available to meet on the suggested dates in March 2023.
- On 24 February 2023 Woodside sent [REDACTED] and Save Our Songlines a follow up email. Woodside reiterated its availability to meet.
- On 24 February 2023 the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside and advised its client was available to meet on 13 and 14 March 2023.
- On 28 February 2023 the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside to follow up on the request to secure a meeting.
- On 1 March 2023 Woodside emailed [REDACTED] and Save Our Songlines (and CC to EDO) to propose the meeting time and location for 14 March 2023.
- On 7 March 2023 the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside to confirm the meeting time and location for 14 March 2023.

- On 8 March 2023 Woodside emailed the EDO, [REDACTED] and Save Our Songlines with a proposed agenda for the 14 March 2023 meeting and requested the stakeholder advise if there are any particular issues they wish to discuss during the meeting.
- On 10 March 2023, Woodside emailed EDO, [REDACTED] and Save Our Songlines with further logistic and meeting protocol details for the proposed meeting on 14 March 2023.
- On 14 March 2023, Woodside met with EDO, [REDACTED] and Save Our Songlines on-country and discussed the proposed activity. This meeting represented the first time Woodside and [REDACTED] and Save Our Songlines had met in person since the initial identification of Save Our Songlines in November 2021.
- Woodside provided an overview of the Scarborough activities (Seismic EP, Subsea EP, D&C EP, SITI EP (Ch and State)).
- Feedback from [REDACTED] and Save Our Songlines (at the on-Country meeting):
- [REDACTED] and Save Our Songlines told Woodside that the proposed activities gave them a sick feeling and the activities should be stopped. [REDACTED] and Save Our Songlines also informed Woodside that, in their view, there is nothing that can be done by Woodside to progress with the proposed Scarborough activities in a way that could minimise impact to [REDACTED] and Save Our Songlines' functions, activities and interests or is respectful to its culture and country.
- Woodside Response (at the on-Country meeting):
- Woodside agreed not to share cultural details which were shared with at the 14 March 2023 meeting.
- Woodside provided responses to specific actions taken during the meeting.
- Woodside provided background information on the "why" behind the Scarborough activities.
- Woodside's Scarborough Gas Project helps play a role in the global energy transition, helping neighbouring Asian countries take action on emissions reduction and advised there is further information on Woodside's website.
- Woodside to check with MAC whether MAC's ethnographic survey can be shared with [REDACTED] and Save Our Songlines –
- The ethnographic survey is held by MAC and Woodside does not have permission to share it.
- Confirm fracking in relation to the Scarborough activities – there is no fracking to be undertaken as part of the proposed Scarborough activities.
- On 16 March 2023, Woodside emailed EDO, [REDACTED] and Save Our Songlines to advise that:
 - It appreciated the request for Woodside to attend the meeting with open hearts, deep listening and respectful conversation and that it would intend to continue this approach to engagement.
 - Woodside's consultation process is ongoing through the environmental approval process and when an activity is being performed and that Woodside looks forward to continuing its discussions with [REDACTED] and Save Our Songlines in the future.
 - Woodside is open to consulting further with [REDACTED] and Save Our Songlines on the proposed Scarborough activities and are open to the continuing engagements regarding the Scarborough activities.
- On 17 March 2023, Woodside emailed [REDACTED] and Save Our Songlines acknowledging SOS's correspondence to Woodside dated 6 June 2022, 26 September 2022 and 24 November 2022 and the discussion with Woodside on 14 March 2023. Woodside included an attachment containing responses to relevant objections, claim and additional information raised in the correspondence relating to the activities the subject of this EP. Woodside stated:
 - Woodside has conducted an ethnographic survey to support the development of EPs for the Scarborough Project which have not identified any heritage places, objects or values which will be impacted by the activities covered by the this EP.
 - None of Woodside's agreements with Traditional Custodians include "gag clauses" or restrictions on voicing opinions on our projects.
 - Re the principles of FPIC Woodside is guided by UNDRIIP under our Indigenous Communities Policy and has consulted representative institutions including MAC for a number of years.
 - Woodside has made several attempts since November 2021 to engage with Save Our Songlines, [REDACTED] and [REDACTED] with a meeting held on Tuesday 14 March 2023. Woodside is open to receiving feedback.
 - Re cultural heritage impacts, concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to the Seismic EP. The extraction of Scarborough gas for onshore processing is not within the scope of the activity described in the Seismic EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the PAP for this EP but may be evaluated in other Scarborough EP's as appropriate.
 - Re impacts on rock art through pollution, emissions from the activities covered by the Seismic EP are of a scale and physical remoteness from Murujuga's rock art that no credible impact pathway is foreseen. The activities covered by the Seismic EP are located ~374 km away from Murujuga.
 - Re the proposed removal of rock art from the Pardaman site, Woodside stated it is not appropriate for Woodside's EP's to address or seek to regulate the activities of third parties progressing separate projects.
 - Woodside has resourced Traditional Custodian representative institutions to access relevant information and independent expert advice so that they are enabled to provide informed and considered feedback on the broader Scarborough activities.
 - A number of documents containing cultural heritage information, including heritage assessments, contain the intellectual property of Traditional Custodians or sensitive information that may be culturally restricted. For these reasons, Woodside does not disclose this information. This information is held by representative institutions and may be disclosed by them where they consider it appropriate to do so. The Scarborough Project Cultural Heritage Management Plan is a publicly available document and can be found on Woodside's website.
 - Woodside continues to consult with MAC on all relevant aspects of this EP prior to and during the execution of activities.
 - Re impacts and risks on Aboriginal heritage sites on and around Murujuga, Woodside has undertaken archaeological assessments and ethnographic surveys to identify cultural heritage that may be impacted by Scarborough activities. These works have not identified any heritage places, objects or values which will be impacted by the activities covered by the Seismic EP.
 - Woodside considers the time it has provided to consider information prior to meetings to be more than suitable to inform SOS' feedback on Woodside's proposed Scarborough EPs.
 - We confirm as per Woodside's ongoing consultation approach, feedback and comments received continue to be assessed and responded to, as required, through the life of an EP, including during EP assessment and throughout the duration of the accepted EP, in accordance with the intended outcome of consultation.
- On 24 March 2023, the EDO (acting on behalf of [REDACTED] and Save Our Songlines) provided a letter to Woodside which copied NOPSEMA, DMIRS and the WA Minister for Mines and Petroleum:
 - The letter detailed a response to the 14 March 2023 meeting and Woodside's 16 March 2023 email, and covered a range of Scarborough EPs, including this proposed activity.
 - The EDO noted its client's concerns relating to:
 - The summary of the meeting provided by Woodside
 - clarification of its client's position
 - communication of relevant person status
 - Acknowledgement of response to questions arising at the meeting of 14 March 2023.
 - The letter noted that the EDO's clients would review the consultation information provided, and that it anticipates its clients would require approximately six weeks to do this.

- The letter requested Woodside not submit the draft environment plan until consultation was complete.
- On 29 March 2023 Woodside emailed the EDO [REDACTED] and Save Our Songlines (CC to NOPSEMA) in response to the 24 March 2023 letter. Woodside reiterated its responses to topics raised during the meeting and in previous correspondence, relevant to the proposed activity. The response included the following responses which are summarised as follows:
 - Additional or new information
 - Woodside advised it has a process in place for the life of an EP that allows the EP to be updated to include additional or new information or feedback that is received after an EP is submitted. This is done through a "Management of Knowledge" process. This means that feedback or information provide in future meetings can still be taken into account and, where appropriate, can be incorporated in the EP during the life of the activity.
 - Woodside advised that following the meeting, based on the information provided, no updates were required to the EP via the Management of Knowledge process.
 - Functions, interests and activities
 - Woodside acknowledged that it had been advised that [REDACTED] and Save our Songlines' functions interests and activities are distinct from those of MAC and that it was interested to learn about this further.
 - In response to a request for the ethnographic survey undertaken by MAC, Woodside reiterated that it has no authority to provide this information. Woodside suggested that [REDACTED] may have contacts at MAC to request a copy of that survey.
 - Woodside advised that as to [REDACTED] and Save Our Songlines' functions, interests and activities (and those of Save Our Songlines), it continues to invite these to be shared with Woodside so it can consider the likely impacts and risks of the EP activities on these functions, interests and activities and what Woodside can do to lessen or avoid those impacts.
 - Woodside confirmed that as [REDACTED] and Save Our Songlines' were not prepared to share some information with Woodside, it remains open to hearing from them when this is known, and it is ready to be shared.
 - Minimising impacts to functions, interests and activities
 - Woodside reshared its interpretation of the take-aways from the meeting in relation to:
 - Underwater activities
 - Greenhouse gas emissions.
 - In the meeting, Woodside provided an overview of the Scarborough Project and potential impacts of activities on whales.
 - Emissions from the activities covered by the Commonwealth EPs are of a scale that no credible impact pathway is foreseen. This has been the subject of separate correspondence.
 - Industrialisation of Murujuga
 - This subject has been addressed in separate correspondence in which Woodside has set out its understanding of the history of the Burrup and the industrial agreements involved. Woodside has also provided responses which are along the lines that no credible impact pathway is foreseen from the activities covered by the Commonwealth EPs which could damage rock art and heritage sites and that no cultural impact to future access to sites of cultural and spiritual significance is foreseen.
 - Detail of EPs and information accessed and provided.
 - The meeting provided an overview of the Scarborough Project and followed volumes of previous correspondence on the Scarborough Project. Previous correspondence indicates that a large volume of information on the Scarborough Project has been accessed, read and thought through. The correspondence shows an informed and thorough understanding of the various Scarborough activities and the Scarborough Project.
 - Consultation in general
 - Woodside advised it has continued to consult with [REDACTED] and Save Our Songlines' and continues to invite further consultation.
 - Relevant persons
 - Woodside advised that the Commonwealth approval process requires Woodside to consult with "relevant persons".
 - Woodside has previously explained the approval process relating to the concept of "relevant persons" and noted that, at the relevant time consultations are included under a category of "relevant persons" in EPs. Woodside generally applies this category at a stage when they are trying to understand more about a person's functions, interests and activities and also the impacts of Woodside's activities on them.
 - Woodside reiterated that there is no need for it to categorise persons as relevant in order to consult with them.
 - Ongoing consultation
 - Woodside advised that once an EP is accepted, Woodside continues ongoing consultations with relevant persons. is open to continuing consultation to understand how the proposed Commonwealth EP activities relevantly affect [REDACTED] and Save Our Songlines.
 - Further consultation
 - Woodside noted that in [REDACTED] and Save Our Songlines' correspondence, it would like to organise another meeting and will require approximately six weeks to read into materials and prepare for a meeting.
 - Woodside requested for [REDACTED] and Save Our Songlines' to advise its preferred times for the next meeting, noting the time taken to arrange the previous meeting.
 - Woodside advised it is available to meet in the week commencing 8 May 2023 or earlier.
 - On 6 April 2023, the EDO sent a letter to NOPSEMA and copied Woodside with a subject of "Relevant interested person" consultation requirements – Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan (sic)". The letter suggests that consultation with the EDO's clients [REDACTED] ([REDACTED]) and Save Our Songlines (SOS) has not been completed and therefore this EP should not be accepted.
 - On 17 April 2023, Woodside responded by email to a letter from the EDO dated 6 April 2023 addressed to NOPSEMA and copied to Woodside. Woodside stated:
 - The letter sent by EDO dated 6 April 2023 suggests that consultation with the EDO's clients [REDACTED] ([REDACTED]), [REDACTED] ([REDACTED]) and Save Our Songlines (SOS) has not been completed and therefore this EP should not be accepted by NOPSEMA.
 - Woodside provided notes giving additional context in relation to it raised in the letter, including in relation to Woodside's repeated and protracted attempts to meet, engage and consult with [REDACTED] and SOS on the Scarborough Project, including this EP.
 - Woodside confirmed the EP was submitted for approval on the grounds it met the regulations and that the underpinning consultation effort is documented within the EP, demonstrating provision of sufficient information, time and opportunity to consult over an extended period.
 - Woodside reiterated the process for consultation remains open post EP approval and that it has consistently offered an open invitation to [REDACTED] and SOS to provide feedback to allow Woodside to consider the potential impacts and risks of the activities on functions, interests and activities and to provide input on things Woodside can do to mitigate those potential impacts and risks.
 - An attachment of 5 pages sets out this response to NOPSEMA sets out the history of Woodside's extensive engagements with Alex, [REDACTED] and SOS. It states that since June 2018, Woodside has undertaken 82 substantial engagements relating to the Scarborough Project including 32 meetings with Traditional Custodians and their representatives.

- The letter went on to provide further context and highlighted relevant engagements with [REDACTED] and SOS, and stated Woodside's position i.e. having regard to all of the circumstances of the consultation undertaken with [REDACTED] and SOS, and in light of the concepts of "reasonable time", "reasonable diligence", a consultation obligation that "must be capable of practical and reasonable discharge ... that must be capable of performance", NOPSEMA can be reasonably satisfied that an appropriate level of consultation has taken place with [REDACTED] and SOS.
- It further stated that a previous EP which included the seismic activity proposed to be undertaken in June 2019 and accepted by NOPSEMA in December 2019. The activity was unable to be commenced because of COVID and that for the current EP, the Activity description, location, risks and impacts and controls have substantially remained the same through the various re-submissions of the EP that have occurred since October 2021. During the re-submission process, the EP Activity description has, however reduced – for example, the Activity no longer proposes to include use of autonomous ocean bottom seismic nodes.
- Woodside also outlined details about correspondence and the opportunities and invitations Woodside has attempted to provide for consultation to occur and why these have not occurred.
- Woodside closed the letter by stating Woodside would be pleased to discuss the notes contained in this letter and the issues raised in the Letter from EDO with NOPSEMA.
- On 9 May 2023, Woodside emailed [REDACTED] and Save Our Songlines and included responses to relevant objections, clai and additional information raised on 6 June 2022, 26 September 2022 and 24 November 2022.
- Woodside confirmed it has conducted an ethnographic survey to support the development of EPs for the Scarborough Project (Mott 2019, McDonald and Phillips 2021, Nutley 2022a and 2022b). These works have not identified any heritage places, objects or values which will be impacted by the activities covered by the SITI EP. An ethnographic survey determines the cultural values which are associated with a particular area, feature or object. Representatives from the Mardudhunera, Ngarrluma, Yaburara, Yindjibarndi and Wong-Goo-Ti-Oo Peoples—all five indigenous groups represented by MAC—participated in these surveys (Mott 2019, McDonald and Phillips 2021). Participants were not restricted in the types of heritage or other values they were encouraged to identify, but typical results from surveys of this nature might include songlines, ceremonial places such as 'thalu' sites for managing environmental resources, or places where activities such as birthing, initiation or other significant activities are performed.
- Woodside advised Archaeological assessments have been made over the ancient landscape, being the extent of the continental shelf which was previously exposed during human occupation. This includes an Australian-first assessment of the archaeological perspective along the trunkline route conducted with the support and consultation of Traditional Custodians (UJWA 2021). An executive summary is available on Woodside's website at <https://www.woodside.com/docs/default-source/sustainability-documents/indigenous-peoples/cultural-heritage/scarborough-pipeline-cultural-heritage-assessment-exec-summary.pdf>
- Woodside advised it has had all of its submerged heritage work assessed by an expert underwater archaeologist for gaps in our processes (Nutley 2022a), as well as a review of Side Scan Sonar data to confirm whether archaeological sites could be identified on the seabed (Nutley 2022b).
- Woodside advised that Section 4.9.1 of the EP includes a summary of these assessments. The assessments include the relevant areas sufficient to assess the cultural values of the Operational Area for this EP.
- Woodside confirmed None of Woodside's agreements with Traditional Custodians include "gag clauses" or restrictions on voicing opinions on its projects. Woodside has supported Traditional Custodian representative institutions to access relevant information and independent expert advice so that they are enabled to provide informed and considered feedback on the Scarborough project.
- Woodside advised that the principles of Free, Prior and Informed Consent (FPIC) are based in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) where it is envisaged as a communal right of Indigenous communities and secured through consultation with representative institutions utilising traditional decision-making mechanisms such as deferring to MAC's Circle of Elders. Woodside is guided by UNDRIP under its First Nations Communities Policy and has consulted representative institutions including MAC for a number of years.
- Woodside confirmed it has made several attempts since November 2021 to engage with Save Our Songlines, [REDACTED] and [REDACTED] with a meeting held on Tuesday 14 March 2023. Woodside confirmed that Woodside is open to receiving feedback on the SITI EP.
- Woodside confirmed that concerns related to carbon and the impact on climate change from Scarborough gas are not relevant to this EP. This EP assesses both direct and indirect impacts and risks associated with the proposed Petroleum Activities Program, having regard to the nature and scale of the proposed Petroleum Activities Program.
- Woodside advised the proposed Petroleum Activities Program is outside of the National Heritage Place and the anticipated boundary of the Murujuga Cultural Landscape World Heritage Property.
- Woodside confirmed the extraction of Scarborough gas for onshore processing is not within the scope of the activity described in this EP. Therefore, indirect impacts and risks arising from the onshore processing of Scarborough gas are not considered indirect impacts/risks of the Petroleum Activities Program for this EP but may be evaluated in other Scarborough EPs as appropriate.
- Woodside confirmed emissions from the activities covered by this EP are of a scale and physical remoteness from Murujuga's rock art that no credible impact pathway is foreseen. Woodside advised that no rock art will be displaced as a result of the Scarborough Project.
- The activities covered by this EP are located in Commonwealth waters and will have no impact on access to sites of cultural and spiritual significance.
- Woodside advised it has resourced Traditional Custodian representative institutions to access relevant information and independent expert advice so that they are enabled to provide informed and considered feedback on the broader Scarborough activities. A number of documents containing cultural heritage information, including heritage assessments, contain the intellectual property of Traditional Custodians or sensitive information that may be culturally restricted. For these reasons, Woodside does not disclose this information. This information is held by representative institutions and may be disclosed by them where they consider it appropriate to do so.
- Woodside provided a link to the Scarborough Project Cultural Heritage Management Plan which is a publicly available document and can be found at: https://www.woodside.com/docs/default-source/our-business---documents-and-files/burnup-hub---documents-and-files/scarborough---documents-and-files/scarborough-cultural-heritage-management-plan.pdf?srsltid=AfmNOojqd1cmqbw-scjouw-2jw-P6ae353a_3
- Woodside advised it continues to consult with MAC on all relevant aspects of this EP prior to and during the execution of activities.
- Woodside advised it considers the adequate time and information it has provided, including the meeting on Tuesday 14 March 2023, to be more than suitable to inform feedback on Woodside's proposed Scarborough EPs.
- Woodside confirmed that as per Woodside's ongoing consultation approach, feedback and comments received continue to be assessed and responded to, as required, through the life of an EP, including during EP assessment and throughout the duration of the accepted EP, in accordance with the intended outcome of consultation.
- Woodside reiterated the consultation information sheet has been available on Woodside's website since August 2021 and invited feedback on the proposed activities to be provided before 30 September 2021. Revision 1 of the EP has been available on the NOPSEMA website since 13 January 2022. Woodside re-provided links to both documents.
- On 10 May 2023, the EDO (acting on behalf of [REDACTED] and Save Our Songlines) emailed Woodside to query the date of previous correspondence.
- On 15 May 2023, Woodside emailed the EDO confirming that the May 2023 correspondence refers to emails dated 9 May 2023 with the subject line "RE: Scarborough Environment Plans – Consultation.
- On 1 June 2023, the EDO emailed Woodside confirming [REDACTED] and Save Our Songlines were available to meet in Karratha on Tuesday, 13 June 2023.

Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>█, █ and Save Our Songlines have provided requests for further information on the broader Scarborough activities (including the proposed activity) relating to:</p> <ul style="list-style-type: none"> Background information on the Scarborough activities Whether MAC's ethnographic survey can be shared with █, █ and Save Our Songlines. Confirmation if fracking will be conducted in relation to the Scarborough activities <p>█, █ and Save Our Songlines have provided feedback, clai and objections on the broader Scarborough activities (including the proposed activity) relating to:</p> <ul style="list-style-type: none"> Consultation requirement in general, including the consultation information and additional information provided by Woodside, as well as responses to questions and topics raised. █, █ and Save Our Songlines sought to be recognised as relevant persons Impacts from the proposed activity on █, █ and Save Our Songlines' functions, interests and activities: <ul style="list-style-type: none"> Underwater activities Greenhouse gas emissions Industrialisation of Murujuga Details of EPs and information accessed and provided Ongoing consultation 	<p>Woodside has consulted with █, █ and Save Our Songlines on both the proposed activity and the broader Scarborough project.</p> <p>Following a meeting with █, █ and Save Our Songlines on 14 March 2023 (and subsequent correspondence from the EDO on 24 March 2023), Woodside has assessed feedback and topics raised relevant to the proposed activity. Feedback has been assessed as it applies to this EP and a summary of responses has been provided to address specific claim and objections raised on the proposed activity, where appropriate.</p> <p>Section 4.10.1 of the EP includes a summary of assessments of relevant areas sufficient to assess the cultural values of the Operational Area for this EP.</p> <p>Woodside engages in ongoing consultation throughout the life of an EP. Woodside notes that further feedback may be received as part of ongoing consultation. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>Woodside has consulted █, Ms █ and Save our Songlines in the course of preparing this EP. Woodside has assessed the claims or objections raised by █, █ and Save our Songlines. No additional measures or controls have been put in place.</p> <p>Woodside considers the measures and controls described within this EP address the potential impact from the proposed activities on █, █ and Save our Songlines's functions, interests or activities.</p>
Research institutes and local conservation groups or organisations		
National Energy Resource Australia (NERA) Collaborative Seismic Environment Plan Project (CSEP)		
<p>Woodside considers it has discharged its obligations under regulation 11A by providing consultation materials and conducting various forms of engagement as set out in Section 5.8 and below.</p> <p>Summary of information provided and record of consultation:</p> <ul style="list-style-type: none"> On 28 April 2022, NERA self-identified via email on a separate EP and requested information on the proposed activity. NERA noted that the Operational Area of the proposed activity overlaps with the area outlined in its Collaborative Seismic Environment Plan. On 11 May 2022 Woodside emailed NERA advising of the proposed activity (Appendix F, reference 1.28) and provided a Consultation Information Sheet. <ul style="list-style-type: none"> Woodside noted to NERA that given the EP is in its final stages of assessment, stakeholder feedback at this time may not be able to be incorporated into the EP but will be considered as necessary. NERA was advised it would be kept informed of any future relevant consultation regarding the activity. On 11 November 2022, Woodside sent an email to NERA in relation to the Scarborough EPs. (Appendix F, reference 1.37) On 22 February 2023, Woodside emailed NERA a reminder that consultation is closing soon (Appendix F, reference 1.90). On 24 February 2023, NERA thanked Woodside for keeping CSEP up to date and confirmed they have no comments and no planned activities for 2023. On 28 February 2023, Woodside emailed and confirmed they will provide NERA with commencement and cessation of activity notifications relating to the proposed activities. On 1 May 2023, NERA emailed Woodside on a separate project advising the Collaborative Seismic EP had been withdrawn and will no longer go ahead. NERA requested that the CSEP be removed from relevant person consultation. On 2 May 2023, Woodside emailed NERA confirming Woodside would remove the CSEP from its relevant person consultation for future EPs. 		
Summary of Feedback, Objection or Claim	Woodside Energy's Assessment of Merits of Feedback, Objection or Claim and its Response	Environment Plan Controls
<p>No feedback, objections or claims received despite follow up.</p>	<p>Woodside engages in ongoing consultation throughout the life of an EP. Should feedback be received after the EP has been accepted, it will be assessed and, where appropriate, Woodside will apply its Management of Change and Revision process (see Section 7.6).</p>	<p>No additional measures or controls are required.</p>

Ruby Hamilton

From: Ruby Hamilton
Sent: Friday, 24 March 2023 12:18 PM
To: [REDACTED]
Cc: Woodside Feedback; Clare Lakewood; 'minister.johnston@dpc.wa.gov.au'; 'richard.sellers@dmirs.wa.gov.au'; 'sue.mccarrey@nopsema.gov.au'
Subject: RE: Scarborough Environment Plans - Consultation
Attachments: 230324 Letter EDO to Woodside - Scarborough Environment Plans Consultation.pdf
Categories: LEAP

Dear [REDACTED]

Please find attached correspondence on behalf of our clients, Ms Josie Alec and Ms Raelene Cooper.

Kind regards

Ruby Hamilton | Solicitor | EDO
+61 8 6118 7914

From: [REDACTED]@woodside.com>
Sent: Thursday, March 16, 2023 5:16 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>; Ruby Hamilton <ruby.hamilton@edo.org.au>
Cc: Woodside Feedback <Feedback@woodside.com>; 'info@saveoursonglines.org' <info@saveoursonglines.org>
Subject: RE: Scarborough Environment Plans - Consultation



Dear Ruby and Clare

Thanks for our meeting on Tuesday (14 March 2023).

Josie, Raelene and Save Our Songlines asked that Woodside continue correspondence with them, via you. Hence our email and our respectful request that the following be communicated to Josie, Raelene and Save Our Songlines.

Dear Josie, Raelene and Save Our Songlines

We are grateful for our on-country meeting with you, Skyla and Clare and Ruby (as well as the welcome to country from your son Mark) on 14 March 2023. We want to let you know that, as a group of women, we feel privileged to have been welcomed to the beautiful country where we met and we appreciate you sharing your stories, cultural knowledge and your concerns with us.

We appreciate your request for us to attend the meeting with open hearts, deep listening and respectful conversation and we intend to continue this approach to our engagement. Our consultation process is ongoing through the environmental approval process and when an activity is being performed. We look forward to continuing our discussions with you in the future.

At our meeting, Woodside provided an overview of the Scarborough activities (Seismic EP, Subsea EP, D&C EP, SITI EP (Cth and State)), and you told us that the proposed activities give you a sick feeling and the activities should be stopped. You also let us know that, in your view, there is nothing that can be done by Woodside to progress with the proposed Scarborough activities in a way that could minimise impact to your functions, activities and interests or is respectful to your culture and country.

We confirm that we agreed not to share cultural details that you shared with us at the 14 March 2023 meeting. To respect this, we will not include cultural detail you shared with us at our meeting in Woodside's environment plans or in conversations with the Regulator. For clarity, as agreed, our proposed environment plans will confirm that we met with you on 14 March 2023 to continue consulting with you on the proposed Scarborough environment plans. So you are aware, this email as well as previous correspondence with SOS and Josie and Raelene will also be included in the proposed environment plans.

We took the following actions from the meeting. Responses are provided in italics:

- Provide background information on the "why" behind the Scarborough activities: *Woodside's Scarborough Gas Project helps play a role in the global energy transition, helping neighbouring Asian countries take action on emissions reduction. There is further information on our website: [Scarborough Gas Project and Pluto Train 2 - Woodside Energy](#).*
- Check with MAC as to whether MAC's ethnographic survey can be shared with Josie, Raelene and Save Our Songlines: *The ethnographic survey is held by MAC and Woodside does not have permission to share it.*
- Confirm fracking in relation to the Scarborough activities: *There is no fracking to be undertaken as part of the proposed Scarborough activities.*

We want you to know that, as discussed, we are open to consulting further with you on the proposed Scarborough activities and are open to the continuing engagements regarding the Scarborough activities. Please let us know if further feedback for the activities proposed under the environment plans is sensitive and we will make this known to NOPSEMA upon submission to ensure this information remains confidential to NOPSEMA.

In the meantime, we are grateful to have met you and to have heard your perspectives on the Scarborough activities and Woodside.

Best regards

[Redacted signature]

[Redacted signature]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [Redacted]
M: [Redacted]
E: [Redacted].com
www.woodside.com
f t in v @

24 March 2023

[REDACTED]
Woodside Energy Group Ltd

By email: [REDACTED].com; feedback@woodside.com

Copy to: Hon. Bill Johnston (Minister for Mines and Petroleum):
Minister.Johnston@dpc.wa.gov.au
Richard Sellers (Director General; Department of Mines, Industry Regulation and Safety): Richard.Sellers@dmirs.wa.gov.au
Sue McCarrey (Chief Executive Officer; NOPSEMA): sue.mccarrey@nopsema.gov.au

Dear [REDACTED],

Scarborough Gas Project—Environment Plan Consultation

1. We refer to the meeting between our clients, Ms Josie Alec and Ms Raelene Cooper, with [REDACTED] of Woodside on 14 March 2023; and to [REDACTED] email of 16 March 2023.
2. Our clients appreciate the opportunity to have a first meeting to discuss culturally appropriate protocols for undertaking consultation and begin to understand the activities comprising parts of the Scarborough Gas Project that are the subject of the:
 - a. Scarborough 4D B1 Marine Seismic Survey environment plan (**Seismic Survey EP**);
 - b. Scarborough Drilling and Completions environment plan (**Drilling and Completions EP**);
 - c. Scarborough Subsea Infrastructure and Installation environment plan (**Subsea Infrastructure EP**);
 - d. Scarborough Seabed Intervention and Trunkline Installation environment plan (**Federal Waters Trunkline EP**);
 - e. Scarborough Trunkline Installation (State waters) environment plan (**State Waters Trunkline EP**);

(collectively, **EP Activities**), so that they may assess how their interests, functions and activities will be affected, and work with Woodside to ensure impacts are acceptable, as low

as reasonably practicable and consistent with the principles of ecologically sustainable development.

3. As we indicated by way of next steps at our meeting of 14 March 2023, we provide this letter to confirm the outcomes and next steps from that meeting, as well as to emphasise some of the important matters raised in that meeting.
4. Though, as discussed further below, our clients are concerned about Woodside's failure to tell our clients that Woodside considers them 'relevant persons', our clients appreciate that the State Waters Trunkline EP Summary dated February 2023¹ and submitted to the Minister for Mines and Petroleum on 22 February 2023² acknowledges them as such.
5. Our clients also appreciate that, as requested, only women attended the meeting with Woodside. We reiterate that the information shared about our clients' functions, interests and activities must be kept to women.

I. Summary of meeting

6. Our client explained (consistent with their correspondence to you of 22 July 2022) that their functions, interests and activities are distinct from those of Murujuga Aboriginal Corporation (**MAC**). As explained at the meeting, our clients have distinct cultural heritage, their stories were not told as part of any consultation that may have occurred with MAC or as part of other surveys, and they want to ensure that Woodside is properly informed of the impacts and risks of the EP Activities on their functions, interests and activities.
7. Our clients raised particular concerns about the impacts that underwater activities that form part of the EP Activities might have on their functions, interests and activities.³ They also raised their concerns about the impacts of related greenhouse gas emissions on their functions, interests and activities; and the industrialisation of Murujuga.
8. The questions our clients asked at the meeting that required follow up are set out further, below, under heading IV. Responses to Questions Arising at the Meeting of 14 March 2023.
9. At this first meeting, which focused on explaining our clients' interests, we did not discuss any environment plan in detail.
10. All parties expressed their commitment to undertaking this consultation process.

II. Clarification of our clients' position

11. The email from [REDACTED] of 16 March 2023 characterised our clients' position during consultation as being that:

¹ Woodside Energy, Scarborough Trunkline Installation (State Waters) Environment Plan Summary (Rev 3) (Feb 2023), available:

<https://ace.dmp.wa.gov.au/ACE/Public/PetroleumProposals/ViewPlanSummary?registrationId=112024>

² Department of Mines, Industry Regulation and Safety, "Environmental Assessment and Regulatory System", available: <https://ace.dmp.wa.gov.au/ACE/Public/PetroleumProposals>.

³ Specific detail about the cultural heritage and places of concern was provided at the meeting.

[t]here is nothing that can be done by Woodside to progress with the proposed Scarborough activities in a way that could minimise impact to your functions, activities and interests or is respectful to [our] clients['] culture and country.

12. This mischaracterises our clients' response to the question put to them by Ms Ju-Lin O'Connor of Woodside in the meeting of 14 March 2023. Ms O'Connor asked our clients whether there is a way to proceed with the Scarborough Gas Project and protect the songlines. Our clients indicated that in their view there is not, and that the sea floor should not be dug up. While it is our clients' view that Woodside should not undertake the Scarborough Gas Project because of the harm it will cause, that is different to a conclusion that there is "nothing that can be done" to minimise impacts or be respectful to our clients, their culture and their Country.
13. Our clients regard genuine consultation on the proposed EP Activities an important demonstration of respect for their functions, interests and activities. They anticipate that the consultation process which has just commenced, including provision of the information they have requested and the opportunity to respond will at least:
 - a. inform them of the full extent of how their functions, interests and activities may be affected;
 - b. enable the adoption of appropriate measures to address risks and impacts, including to ensure that the risks and impacts of the EP Activities are made acceptable and as low as reasonably practicable; and
 - c. ensure compliance with section 280 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (Cth).
14. The mischaracterisation of our clients' position in a way that implies nothing is to be gained from consulting them is inconsistent with the expressed commitment to consultation from all parties; and Woodside's obligations to:
 - a. provide sufficient information to allow our clients to understand how their functions, interests and activities may be affected;
 - b. adopt appropriate measures in response to our clients concerns; and
 - c. adequately convey to the regulator the nature of our clients' functions, interests and activities and the measures to be adopted to reduce impacts to those functions, interests and activities.⁴

III. Communication of Relevant Person Status

15. Our clients are relevant persons for purposes of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth) and the *Petroleum (Submerged Lands) (Environment) Regulations 2012* (WA). Woodside is required to provide them with sufficient information and a reasonable period for consultation on each of the environment plans.⁵

⁴ *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth) (**OPGGGS Regulations**) reg 10A(g); *Santos NA Barossa Pty Ltd v Tipakalippa* [2023] FCAFC 193 (**Tipakalippa**) [50], [56]-[57], [141].

⁵ *OPGGGS Regulations* reg 11A(2)-(3); *Tipakalippa* [56].

16. Our clients first provided written assertion of their rights to be consulted as 'relevant persons' for the purpose of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth) on 6 June 2022. In correspondence of 24 November 2022, Woodside was asked to confirm that it considers our clients to be 'relevant persons' for the purpose of consultation.
17. Our clients did not receive a response to that request.
18. The State Waters Trunkline EP Summary dated January 2023⁶ and submitted to the WA Minister for Mines and Petroleum on 5 January 2023 identified the organisation our clients founded, Save Our Songlines, as a relevant person, but did not identify our clients as relevant persons.
19. As you confirmed at our meeting, a revised version of that environment plan submitted to the Minister for Mines and Petroleum on 22 February 2023 identifies our clients as relevant persons.⁷ Despite the explicit request, our clients were never notified by Woodside that Woodside considered them relevant persons.
20. Additionally, Woodside submitted the latest version of the State Waters Trunkline EP to the Minister for Mines and Petroleum before ever meeting with our clients. That is, it submitted the State Waters Trunkline EP before undertaking an appropriate level of consultation with our clients.⁸

IV. Acknowledgement of Responses to Questions Arising at Meeting of 14 March 2023

21. At the meeting our clients requested:
 - a. An explanation as to why Woodside is proceeding with the Scarborough Gas Project given:
 - i. the impact it will have on Murujuga and our clients' cultural heritage,
 - ii. the impacts of the greenhouse gas emissions from the project; and
 - iii. the possibility of other, less harmful projects Woodside might pursue;
 - b. A copy of the ethnographic survey Woodside has undertaken with MAC; and
 - c. Confirmation that fracking would not form part of the Scarborough Gas Project.
22. In response, [REDACTED] email of 16 March 2023:
 - a. provided a link to Woodside's publicly available website about Scarborough and Pluto Train 2;⁹
 - b. advised the requested ethnographic survey is held by MAC and Woodside does not have permission to share it with our clients;

⁶ No longer publicly available.

⁷ We note and understand the reasons that our clients' names are redacted in the publicly available environment plan summary.

⁸ *Petroleum (Submerged Lands (Environment) Regulations 2012* (WA) reg 11(1)(f).

⁹ Woodside, "Scarborough and Pluto Train 2" (Web Site) < <https://www.woodside.com/what-we-do/growth-projects/scarborough>>

c. confirmed that there is to be no fracking undertaken as part of the proposed Scarborough activities.

23. We also requested that our clients be notified when documents are submitted to decisionmakers, and be provided with any material submitted to those decisionmakers that is public, or which relates to our clients' interests. This will ensure our clients are aware of information relevant to their interests in a timely manner. [REDACTED] email did not respond to this request.

V. Next Steps

24. Our clients will review the information about the Federal Waters Subsea Infrastructure EP and the Seismic Survey EP, and consider whether it adequately answers the questions raised in their previous correspondence, and their response.

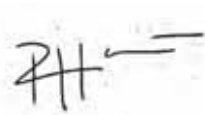
25. We will contact you once they have had the time needed to review and digest that information, and to arrange the next step in consultation. Our clients anticipate that they will require approximately six weeks to do this.

26. Given that the obligation to consult is to be discharged prior to submitting an environment plan to NOPSEMA,¹⁰ we request confirmation that Woodside will not submit these environment plans until that consultation is complete.

27. Confirmation that environment plans will not be submitted until our clients are properly notified is particularly important given Woodside's decision to submit its most recent version of the State Waters Trunkline EP without undertaking an appropriate level of consultation with our clients.¹¹

Yours sincerely,

Environmental Defenders Office



Ruby Hamilton

Solicitor

Clare Lakewood

Special Counsel

Reference number: s4118

¹⁰ OPGGS Regulations reg 10(g), 11A; NOPSEMA, *Consultation in the court of preparing an environment plan Guideline* (15 December 2022), p 2, available at:

<https://www.nopsema.gov.au/sites/default/files/documents/Consultation%20in%20the%20course%20of%20preparing%20an%20Environment%20Plan%20guideline.pdf>

¹¹ *Petroleum (Submerged Lands) (Environment) Regulations 2012* (WA) s 17(1).

From: [REDACTED]
To: [Ruby Hamilton: "info@saveoursonglines.org"](mailto:info@saveoursonglines.org)
Cc: [Woodside Feedback](#); [Clare Lakewood](#); sue.mccarrey@nopsema.gov.au
Subject: RE: Scarborough Environment Plans - Consultation
Date: Wednesday, 29 March 2023 12:55:51 PM
Attachments: [image001.png](#)
[shield-advisory.png](#)
[chevron-light.png](#)

 External email >

Dear Ruby

Thanks for your email and letter dated 24 March 2023.

Josie, Raelene and Save Our Songlines asked, at our 14 March 2023 meeting that Woodside continue correspondence with them, via you. Hence our email and our respectful request that the following be communicated to Josie, Raelene and Save Our Songlines.

Dear Josie, Raelene and Save Our Songlines

We received the email and letter sent to us by the Environmental Defenders Office (EDO) dated 24 March 2023. The letter sets out recollections and reflections on the meeting we had on country in Karratha on 14 March 2023 as well as comments on our email of 16 March 2023.

First, we wanted to thank you for sharing the recollections and reflections with us. Secondly, we thought it would be worth sharing our perspectives on comments in that letter – please see these below.

Just so you know, this email relates to the Scarborough Commonwealth EPs. The letter sent to us was copied to an email address for the Chief Executive Officer of NOPSEMA. So, for courtesy and so that you are aware, we are also providing a copy of this email to NOPSEMA. Acknowledging that we separately sent an email to you yesterday on the State Waters EPs that was copied to Minister Johnston and DMIRS.

Consultations, correspondence and meeting on 14 March 2023 [Paragraphs 1-5, 10, 13, 20]

The team at Woodside was pleased to have met face-to-face with you on 14 March 2023. It was the culmination of a long period of communication on the Scarborough Project involving a number of prior attempts to meet face-to-face (since around November 2021) and, since at least June 2022, an extensive exchange of correspondence specific to each of the Scarborough environment plans (EP) and activities set out in the letter (Seismic EP, Drilling EP, Subsea EP, SITI EP, State Waters EP). It was good to meet and we confirm that Woodside remains open to consulting further with you on the Commonwealth EPs as well as the State Waters EP.

A great deal of information was shared at the 14 March 2023 meeting. This included a discussion of your and Save Our Songlines' cultural details and was provided against the backdrop of the protocols we agreed before the meeting. The Woodside team left the 2-hour meeting feeling positive and with a sense of goodwill – we appreciated the exchange of warm mutual embraces at the opening and end of the meeting. We all expressed, at the end of the meeting, a willingness to meet again.

As per discussions leading up to the meeting, unless things change, for future meetings, we agree to continue with the following meeting protocols:

<!--[if !supportLists]-->• <!--[endif]-->Attendees continue to be all female.

<!--[if !supportLists]-->• <!--[endif]-->Attendees attend meetings with an open heart, deep listening and seeking a respectful conversation.

• Attendees come to meetings open to sharing knowledge about the environment (heritage value of places, social and cultural features) that may be affected by the activities under the proposed Scarborough EPs. Attendees come to the meeting open to sharing ideas of things that Woodside is currently doing well and things that Woodside can do to lessen or avoid impacts of the activities on the environment.

• Attendees are welcome to take written notes of meetings. To respect privacy, safety and cultural values there will be no other recording of meetings (e.g. no audio or visual recording of meetings).

• Other than sharing the fact that the meeting took place, the cultural details will be kept confidential amongst the female attendees unless directed otherwise and will not be made public without permission.

We also confirm that Woodside remains open to consulting further with you on the proposed Scarborough activities and is open to the continuing engagements regarding the Scarborough activities.

Additional or new information

So that you are aware, we have a process in place for the life of an EP that allows the EP to be updated to include additional or new information or feedback that is received after an EP is submitted. This is done through a “Management of Knowledge” process. So, for example, if new or additional information is provided to Woodside, Woodside can consider that information and assess the risk in accordance with the environmental risk management methodology in the EP to determine the significance of potential new environmental impacts or risks not already provided for in the EP. In that context, if information changes Woodside’s understanding of the environment or understanding of measures that Woodside can take in order to lessen or avoid impacts of activities, that information can be updated and actioned in the EP.

This means that feedback or information you provide in future meetings can still be taken into account and, where appropriate, can be incorporated in the EP during the life of the activity.

Following the meeting, we considered what you told us. Based on that information, no updates were required to the EP via the Management of Knowledge process.

Functions, interests and activities [Paragraph 6, 13]

Thank you for confirming in the letter that you consider that your functions, interests and activities are distinct from those of MAC. We also heard you say this at our meeting. We are interested in learning further about your functions, interests and activities (and those of Save Our Songlines) and how those are different to MAC’s.

The letter also references MAC surveys. As Raelene mentioned in the meeting, Raelene was, for around 10 years, a former Board member of MAC. (We understand Raelene resigned from the Board in around February 2022). So, Woodside’s correspondence, involvement and meetings on the Scarborough Project with Raelene (in her capacity as a MAC representative) also go back a long time to when those discussions commenced with the MAC – in around 2018.

We understand that Raelene was involved in ethnographic studies of the Scarborough Project undertaken by MAC. So, while we have no authority to provide the survey to you, in response to your request for the ethnographic survey, Raelene may have contacts at MAC to request a copy of that survey.

As to your functions, interests and activities (and those of Save Our Songlines), we continue to invite you to share those with us as well to allow Woodside to consider the likely impacts and risks of the EP

activities on these functions, interests and activities and what Woodside can do to lessen or avoid those impacts.

In our meeting, we heard you tell us that you were not prepared to share some information with us at this stage and you weren't sure when you would be ready to share it with us. And we also heard that, sometimes the information has not yet been revealed to you and that it will be revealed to you in time. We remain open to hearing from you when this is known to you and it is ready to be shared.

In particular, we are interested in learning from you:

- <!--[if !supportLists]-->• <!--[endif]-->the role you perform within Save Our Songlines;
- <!--[if !supportLists]-->• <!--[endif]-->individual interests you each have;
- <!--[if !supportLists]-->• <!--[endif]-->the types of communal interests that each of you and Save Our Songlines hold;
- <!--[if !supportLists]-->• <!--[endif]-->the functions of Save Our Songlines as an organization;
- <!--[if !supportLists]-->• <!--[endif]-->the activities that each of you and Save Our Songlines engage in

To confirm - we don't expect you to provide this information to us in writing and would be happy to meet with you again to discuss this information as per our meeting protocols.

It is important that this information is provided so that Woodside can understand how the proposed activities (that are the subject of the Commonwealth EPs) may affect your functions, interests and activities. We remain open to hearing from you when this is known to you and it is ready to be shared.

Minimising impacts to your functions, interests and activities [Paragraphs 7, 9, 11, 12, 13, 14]

Thank you for notes in the letter on the meeting content.

A comment in the letter is that information had been mischaracterised in the email that we sent you following the meeting. We want to be very clear that our intention is not and was not to mischaracterise information. We want to be very clear that the information provided in our email following the meeting is our group's genuine recollection and interpretation of the take-aways from the meeting. That is, consistent with the agreed protocols for the meeting which included a request that you share ideas of things that Woodside is currently doing well and things that Woodside can do to lessen or avoid impacts of the activities on the environment.

Our team has reviewed notes taken at the meeting. Below we've set out our team's perspectives of some of the items noted in the letter.

-

Underwater activities

In the meeting, Woodside provided an overview of the Scarborough Project. At that point in the meeting, a number of topics had been discussed (not repeated here so as to respect confidentiality). After the Scarborough Project was overviewed, at a high level (so as to respect confidentiality), there was a discussion about songlines and, in so far as underwater activities are concerned, there was a discussion about potential impacts of activities on whales.

During this discussion, a question was asked by Woodside along the lines of: *what things can Woodside do in order to carry out the Scarborough Project in a respectful way to the knowledge and cultural information that has been shared in the meeting.* Our team's recollection is that the answer given was along the lines of: *there is nothing Woodside can do to carry out the project in a respectful way and that it*

was not clear why the project was happening in Murujuga and why it couldn't be done somewhere else along the coast.

We also asked what Woodside could do to protect the values that were being talked about. The answer that was given was along the lines of: *all that can be done is for the project to be stopped.*

A further question was asked along the lines of: *if the project is to go ahead what could be done to protect the values.* The answer given was along the lines of: *nothing. The only option is to stop the project.*

These answers informed our take aways from the meeting.

Greenhouse gas emissions

The topic of greenhouse gas was also raised. This topic has been the subject of separate correspondence in which Woodside has confirmed that, emissions from the activities covered by the Commonwealth EPs are of a scale that no credible impact pathway is foreseen.

Industrialisation of Murujuga

The topic of industrialisation of Murujuga was also raised. Out of respect for confidentiality, we will not repeat the information provided in the meeting in relation to signing of the Burrup and Maitland and Industrial Estates Agreement (BMIEA). However, the subject has also been addressed in separate correspondence in which Woodside has set out its understanding of the history of the Burrup and the industrial agreements involved. Woodside has also provided responses which are along the lines that no credible impact pathway is foreseen from the activities covered by the Commonwealth EPs which could damage rock art and heritage sites and that no cultural impact to future access to sites of cultural and spiritual significance is foreseen.

Detail of EPs and information accessed and provided

As set out above, the face-to-face meeting involved an overview of the Scarborough Project. The face-to-face meeting followed volumes of previous correspondence on the Scarborough Project. We acknowledge the many pieces of previous correspondence that have been sent to Woodside which have been specific to each of the EPs set out in the letter. That previous correspondence indicates that a large volume of information on the Scarborough Project has been accessed, read and thought through. The correspondence shows an informed and thorough understanding of the various Scarborough activities and the Scarborough Project.

Offshore Petroleum and Greenhouse Gas Storage Act (OPGGS Act) – section 280 Interference with other rights [paragraph 13]

In the letter, section 280 of the OPGGS Act is noted. We do not understand why that particular aspect of the OPGGS Act has been referenced. We are open to hearing more from you on what you would like us to understand from the reference to section 280 of the OPGGS Act.

Consultation in general [paragraph 14]

The letter has a line that suggests that Woodside is implying that “nothing is to be gained from consulting” with you. We want to be very clear that these are not Woodside’s words. Woodside has not put that position forward and is not making an implication of this kind.

On the contrary, we have continued to consult with you and continue to invite further consultation. We were pleased to have had the opportunity to finally meet with you face-to-face this month and we look forward to further meetings with you to learn of your and Save Our Songlines’ interests.

Relevant persons [paragraph 4, 15-19]

The concept of "relevant person" was raised in the letter and also at our meeting. We heard in the meeting that you were insulted that Woodside had categorised SOS as relevant but had not recognised you under the heading of relevant person. You also told us that you were pleased to see that you and SOS have since been included as relevant interested persons in the State EP summary document. As we discussed at the meeting, Woodside's intention is not to insult you. We reiterate this as we want to be very clear about this.

We also want you to know that the "relevant person" category is different depending on whether the EP requires Commonwealth approval or State approval (WA). For the Commonwealth EPs, the Commonwealth laws apply. The Commonwealth approval process requires Woodside to consult with "relevant persons".

At the meeting, we took you through the approval process relating to the concept of "relevant persons" and noted that, at the relevant time consultations are included under a category of "relevant persons" in EPs. Woodside generally applies this category at a stage when we understand more about a person's functions, interests and activities and also the impacts of our activities on them.

As noted in your letter and above, we also discussed at our meeting that Save Our Songlines, Josie and Raelene have been included under the category of "relevant interested persons" in the State Waters EP. You kindly acknowledged at our meeting that you understood the reasons for redactions that were made to the State EP summary to protect personal information.

These kind of considerations continue and we will have a clearer understanding of the categories when you are able to share more with us. But as we reiterated at the meeting, you should know that there is no need for us to categorise you as relevant in order to consult with you.

Ongoing consultation

Once an EP is accepted, Woodside continues ongoing consultations with relevant persons. As confirmed in the meeting, and consistent with our processes for ongoing consultation, the important issue is that we are open to continuing consultation and that we are keen to keep talking to you to understand how the proposed Commonwealth EP activities relevantly affect you and Save Our Songlines. Once we understand the kind of functions, interests and activities you and Save Our Songlines hold, we can consider the things that Woodside can do to lessen or avoid impacts of the activities to you.

Responses to questions and further information [paragraph 21-27]

The letter notes some questions that were asked during our face-to-face meeting. As acknowledged in the letter, specific questions on the Scarborough Gas Project, the ethnographic survey and fracking have been actioned and there is nothing substantial to add to the answers provided in our email.

As to requests for further information and notifications, please remain subscribed to Woodside's and relevant regulators' website as a best source of information relating to updates to EP assessments.

Further consultation [paragraph 24-27]

The letter sent to us notes that you would like to organise another meeting and will require approximately six weeks to read into materials and prepare for a meeting.

We would be pleased to consult with you further. It took a number of attempts to book and arrange our March face-to-face meeting, so please let us know your preferred times for the next meeting.

If it would be useful, our team is available to meet in the week commencing 8 May 2023 (which is approximately 6 weeks away) or earlier. Please let us know dates you are available so we can book in a next face-to-face meeting.

Best regards
Woodside



Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

From: Ruby Hamilton <ruby.hamilton@edo.org.au>
Sent: Friday, 24 March 2023 12:18 PM
To: [REDACTED]@woodside.com.au
Cc: Woodside Feedback <Feedback@woodside.com.au>; Clare Lakewood <clare.lakewood@edo.org.au>;
minister.johnston@dpc.wa.gov.au; richard.sellers@dmirs.wa.gov.au; sue.mccarrey@nopsema.gov.au
Subject: RE: Scarborough Environment Plans - Consultation

Dear [REDACTED]

Please find **attached** correspondence on behalf of our clients, Ms Josie Alec and Ms Raelene Cooper.

Kind regards

Ruby Hamilton | Solicitor | EDO
+61 8 6118 7914

From: [REDACTED]@woodside.com>
Sent: Thursday, March 16, 2023 5:16 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>; Ruby Hamilton <ruby.hamilton@edo.org.au>
Cc: Woodside Feedback <Feedback@woodside.com>; 'info@saveoursonglines.org'
<info@saveoursonglines.org>
Subject: RE: Scarborough Environment Plans - Consultation

Dear Ruby and Clare

Thanks for our meeting on Tuesday (14 March 2023).

Josie, Raelene and Save Our Songlines asked that Woodside continue correspondence with them, via you. Hence our email and our respectful request that the following be communicated to Josie, Raelene and Save Our Songlines.

Dear Josie, Raelene and Save Our Songlines

We are grateful for our on-country meeting with you, Skyla and Clare and Ruby (as well as the welcome to country from your son Mark) on 14 March 2023. We want to let you know that, as a group of women, we feel privileged to have been welcomed to the beautiful country where we met and we appreciate you sharing your stories, cultural knowledge and your concerns with us.

We appreciate your request for us to attend the meeting with open hearts, deep listening and respectful conversation and we intend to continue this approach to our engagement. Our consultation process is ongoing through the environmental approval process and when an activity is being performed. We look forward to continuing our discussions with you in the future.

At our meeting, Woodside provided an overview of the Scarborough activities (Seismic EP, Subsea EP, D&C EP, SITI EP (Cth and State)), and you told us that the proposed activities give you a sick feeling and the activities should be stopped. You also let us know that, in your view, there is nothing that can be done by Woodside to progress with the proposed Scarborough activities in a way that could minimise impact to your functions, activities and interests or is respectful to your culture and country.

We confirm that we agreed not to share cultural details that you shared with us at the 14 March 2023 meeting. To respect this, we will not include cultural detail you shared with us at our meeting in Woodside's environment plans or in conversations with the Regulator. For clarity, as agreed, our proposed environment plans will confirm that we met with you on 14 March 2023 to continue consulting with you on the proposed Scarborough environment plans. So you are aware, this email as well as previous correspondence with SOS and Josie and Raelene will also be included in the proposed environment plans.

We took the following actions from the meeting. Responses are provided in italics:

- Provide background information on the "why" behind the Scarborough activities: *Woodside's Scarborough Gas Project helps play a role in the global energy transition, helping neighbouring Asian countries take action on emissions reduction. There is further information on our website: [Scarborough Gas Project and Pluto Train 2 - Woodside Energy](#).*
- Check with MAC as to whether MAC's ethnographic survey can be shared with Josie, Raelene and Save Our Songlines: *The ethnographic survey is held by MAC and Woodside does not have permission to share it.*
- Confirm fracking in relation to the Scarborough activities: *There is no fracking to be undertaken as part of the proposed Scarborough activities.*

We want you to know that, as discussed, we are open to consulting further with you on the proposed Scarborough activities and are open to the continuing engagements regarding the Scarborough activities. Please let us know if further feedback for the activities proposed under the environment plans is sensitive and we will make this known to NOPSEMA upon submission to ensure this information remains confidential to NOPSEMA.

In the meantime, we are grateful to have met you and to have heard your perspectives on the Scarborough activities and Woodside.

Best regards

[Redacted signature]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@[woodside.com](mailto:[REDACTED]@woodside.com)
www.woodside.com
f t in v i

From: [REDACTED]@woodside.com>
Sent: Wed, 9 Aug 2023 18:55:29 +0800
To: Jess Border
Cc: Alina Leikin; [REDACTED]; sue.mccarrey@nopsema.gov.au; Woodside Feedback
Subject: Scarborough EP consultation

JLB-1.6

Dear Jess

Thanks for your email.

Please can you pass the information below to Josie, Raelene and Save Our Songlines.

Dear Josie, Raelene and Save Our Songlines

We received an email from EDO today. Woodside is considering the points raised in the email.

In the meantime, we confirm that we have previously consulted you on the Scarborough 4D B1 Marine Seismic Survey Environment Plan on a number of occasions seeking information on potential impacts on your functions, interests or activities that you may have in the EMBA (Environment that may be affected) by the Scarborough 4D B1 Marine Seismic Survey. These occasions include our email of 3 August 2023, emails, letters, phone calls, meetings and other consultation regarding this activity between you and Woodside since around 15 December 2021.

The Scarborough 4D B1 Marine Seismic Survey activity is anticipated to commence on 12 August 2023.

In accordance with conditions 1a) and 1b) of the accepted Scarborough 4D B1 Marine Seismic Survey Environment Plan, we are again writing to confirm:

- a. if you are aware of any people, who in accordance with Indigenous tradition, may have spiritual and cultural connections to the environment that may be affected by the activity that have not yet been afforded the opportunity to provide information that may inform the management of the activity; and
- b. if there is any information you wish to provide on cultural features and/or heritage values.

We request that you provide any feedback by 5pm Friday, 11 August 2023. If no feedback is received relating to items a) and b) above by this time, Woodside will take this to mean that you do not wish to provide this information prior to the commencement of the activity.

Please note that we will also take any feedback regarding the above, or any other relevant information you may wish to provide, at any time during the activity and will assess this information using the mechanisms described in the environment plan.

The purpose of consultation is to ensure that authorities, persons or organisations which are potentially affected by activities are consulted and their input is considered in the development of the environment plans. Consultation gives the titleholder an opportunity to receive information that it might not otherwise receive from those affected by the proposed activity, and for the titleholder to refine or change the measures it proposes to address impacts and risks by taking into account the information received. This process is intended to improve the titleholder's ability to minimise environmental impacts and risks from the activity.

We look forward to hearing from you.

Kind regards
Woodside

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount
Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

From: Jess Border <jessica.border@edo.org.au>
Sent: Wednesday, 9 August 2023 11:09 AM
To: [REDACTED]
Cc: Alina Leikin <Alina.Leikin@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>;
sue.mccarrey@nopsema.gov.au; Woodside Feedback <Feedback@woodside.com.au>
Subject: RE: Scarborough EP consultation

Dear [REDACTED]

I refer to your emails dated 27 July and 3 August.

I confirm that I received the Teams recording of the 25 July meeting and have provided the recording to our clients along with the information in the table attached to your email.

Preliminary comments

Before we respond to the matters set out in your emails, we note our clients expect Woodside to adhere to the conditions imposed by NOPSEMA in its decision made on 31 July 2023 in respect of the Scarborough 4D Marine B1 Seismic Survey environment plan – that is, before commencement of the activity:

- consultation occur with our clients; and
- the method of that consultation be informed by our clients (in the way set out below and in our previous communications).

Our clients made it clear that they have further input or information to provide. We elaborate on this below.

Matters raised in 27 July email

We are instructed to respond to the matters raised in your email as follows:

- Firstly, our clients vehemently reject Woodside's accusation that our clients are, in effect, acting in accordance with some ulterior motive in the consultation. Approaching the meeting in good faith encompasses the need for flexibility when discussing matters of cultural significance and importance. Enforcing a strict adherence to timelines in circumstances where our clients explained they were not ready to provide Woodside with information following the presentation is not consistent with a 'good faith' approach. Further, your email fails to mention that a significant portion of the meeting was unexpectedly dedicated to resolution of the recording issue.
- A fortnightly meeting arrangement is not appropriate in circumstances where our clients will be travelling interstate over the next month. Ms Alec is currently in Melbourne and Ms Alec and Ms Cooper will be travelling to Canberra shortly.
- We accept that the July meeting was originally contemplated to take place on 13 June 2023. For the sake of clarity, EDO had confirmed that Josie and Rae and their solicitors were available on Tuesday 13 June, and had received a proposed meeting agenda from Woodside. Both our clients and their solicitors were available, on Country, on 13 June at the

arranged meeting time, and made themselves available for the remainder of Tuesday 13 June, as well as, Wednesday 14 June and Thursday 15 June of that week to accommodate Woodside. Woodside did not attend. We will revert with dates for a further meeting on Country.

- As stated during the July meeting, we reiterate that it is our clients' intention to consult on the Environment Plans (EP) consecutively rather than concurrently. This gives our clients the opportunity to consider how the activities in each EP affect them and Country. This is a process that requires reflection. We accept there may be overlap, but this does not detract from the need for separate consultation.
- Our clients do not consider that the requirements of the regulations have been met. They consider consultation is in its early stages. Our clients are currently preparing the first responsive video, as contemplated in my earlier email, to provide to Woodside.
- Our clients understand that Woodside has provided compensation to the Murujuga Aboriginal Corporation for engaging in consultation. Our clients consider it discriminatory that Woodside refuse to acknowledge our clients' time and resources in the same way.

Regards

Jess

Jess Border | Solicitor | EDO

From: [REDACTED] <[REDACTED]@woodside.com>

Sent: Thursday, August 3, 2023 6:54 PM

To: Jess Border <jessica.border@edo.org.au>

Cc: Alina Leikin <Alina.Leikin@edo.org.au>; [REDACTED] <[REDACTED]@woodside.com>;

sue.mccarrey@nopsema.gov.au; Woodside Feedback <Feedback@woodside.com>

Subject: RE: Scarborough EP consultation

Dear Jess

Please pass the following to Josie, Raelene and Save Our Songlines.

Dear Josie, Raelene and Save Our Songlines

This email follows our meeting on 25 July and our emails from 25 and 27 July 2023. We look forward to hearing from you including as to your availability for a meeting on country in the week commencing 4 September 2023 (or sooner).

In the meantime, we confirm the Scarborough 4D Marine Seismic Environment Plan has been accepted by NOPSEMA, with conditions. (You can find this on NOPSEMA's website. For ease of reference, please see link here [A855184 \(nopsema.gov.au\)](#) - and para [133] from page 36 in particular).

On Condition 1:- We are writing to you in relation to condition 1 and seeking your confirmation. Please can you let us know if you have input or information to provide.

On Condition 2:- NOPSEMA has published a number of documents on consultation (please see [Document Hub | NOPSEMA](#)). We want to make you aware of these and have provided links to the following recent publications below:

- **Brochure:** [Consultation on offshore petroleum environment plans brochure.pdf \(nopsema.gov.au\)](#)
- **Guideline:** [Guideline: Consultation in the course of preparing an environment plan \(nopsema.gov.au\)](#); and
- **Policy:** [Draft policy for managing gender-restricted information PL2098.pdf \(nopsema.gov.au\)](#).

As you will see from the Guideline (link above), the purpose of consultation is to ensure that authorities, persons or organisations which are potentially affected by activities are consulted and their input is considered in the development of the environment plans. Consultation gives the titleholder an opportunity to receive information that it might not otherwise receive from those affected by the proposed activity, and for the titleholder to refine or change the measures it proposes to address

impacts and risks by taking into account the information received. This process is intended to improve the titleholder's ability to minimise environmental impacts and risks from the activity.

We also want to make you aware that gender-restricted or other culturally sensitive information is managed carefully. If you have gender-restricted or other culturally sensitive information you wish to share, please let us know and we can discuss how to you want it to be managed. If you would prefer to provide the information directly to NOPSEMA, please do so. The attached NOPSEMA "Policy for managing gender-restricted information" provides information on this.

We look forward to hearing from you.

Kind regards
Woodside



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount
Street
Perth WA 6000
Australia

T: [REDACTED]
M: + [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v @

From: [REDACTED]
Sent: Thursday, 27 July 2023 4:47 PM
To: Jess Border <jessica.border@edo.org.au>
Cc: Alina Leikin <Alina.Leikin@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>;
sue.mccarrey@nopsema.gov.au; Woodside Feedback <Feedback@woodside.com.au>
Subject: Scarborough EP consultation

Dear Jess

Thanks for the meeting with Josie, Raelene, Adrianna, Save Our Songlines, EDO and Woodside on Tuesday 25 July and for your email.

We acknowledge receipt of your email following that meeting.

Please can you pass the following to Josie, Raelene, Adrianna and Save Our Songlines.

Dear Josie, Raelene, Adrianna and Save our Songlines

Thanks for meeting with us via Teams on 25 July 2023. It was good to catch up and to consult with you again.

We confirm that we have sent a copy of the audio recording of the meeting to Ms Jess Border to provide to you.

In the meeting you asked some questions and requested information. Please see the **attached table** that provides responses and information requested.

We would like to highlight that we attended the meeting looking forward to hearing information from you and learning about your claims and objections and how Woodside can put in place controls to avoid or minimise impacts to those. We attended the meeting in good faith and ready for deep listening as requested in our previous meeting.

During the meeting you told us that you would not be speaking to us about your cultural interests, nor providing any feedback at this stage, despite agreeing to do so prior to the meeting. Further you stated in the meeting that you would not be able to speak to your cultural interests given we were not on Country. Given the number of times we have met, the amount of information that we have presented to you and the opportunities that have been given for information to be shared, we are concerned that the protracted engagement may be aimed at achieving outcomes other than to provide input to the Scarborough Project and related Environment Plans.

Next steps

We note that our July meeting was originally contemplated to take place in May 2023 (following the March meeting on Country). We also note that during our July meeting we offered to arrange fortnightly meetings to support consultation. We confirm that you declined that offer and that you noted that you will need some time to process the information and respond. You noted you will likely need at least 6 weeks to provide information to us.

To respect your request for a period of 6 weeks to process the information, we confirm our availability to meet on Country from the week commencing 4 September (or sooner). Please can you let us know your availability that week (or sooner).

Consultation

Please note that our preference is to continue to consult you on the Scarborough Project as a whole and to cover the four current Environment Plans. We think this is the best way forward as it presents an opportunity for you to understand the whole project and the links between the Environment Plans, locations and activities. Further, it provides you with an holistic picture and avoids limiting your ability to speak to your cultural interests, functions and activities based on a specific location.

We note that, for example, at the meeting whilst discussing the Scarborough Seismic EP you were interested in and asked some questions that were relevant to the Scarborough Drilling and Completions EP and also the Scarborough Seabed Intervention and Trunkline Installation EP, as well as the broader existing environment that is relevant to all Scarborough EPs. It was helpful for the bigger picture of the project to be presented in order to provide the context for those questions.

Other matters

Consultation - We confirm that the consultation has occurred in accordance with the regulations.

As per our letter dated 3 July 2023 to your lawyers (addressed to EDO, Ms Ruby Hamilton), we confirm that we have consulted pursuant to Reg 11A of the Regulations and in the course of preparing the Scarborough EPs for a significant period of time. Given the length of time involved, the amount of information provided and the opportunity given to consult, the requirements of Reg 11A have been met.

As per our letter dated 13 April 2023 (copied to EDO, Ms Clare Lakewood), we confirm that, from the website we understand that Save Our Songlines was established in November 2021. Consultation with you and Save Our Songlines has been ongoing since at least 15 December 2021, and as recently as 25 July 2023, Woodside has at all times reiterated that it remains open to engaging in further consultation.

There have been numerous exchanges of correspondence, efforts to meet, as well as meetings that took place on 14 March 2023 at Hearson Cove in Karratha and this 25 July 2023 meeting on-line. Woodside has provided ample opportunities to continue consultation and numerous offers to meet and to continue to meet.

Information has been provided that describes in detail, the activity proposed to be undertaken in the Scarborough EPs, the location, the duration, the risks, impacts and controls in place to minimise impacts and risks to as low as reasonably practicable and acceptable levels.

Our meeting consultation materials are prepared and developed on the basis of the extensive information contained in the EPs, consultation information sheets, and summaries, all of which have been provided to you and your legal representatives. The information has not materially changed over the various submissions of the EPs and provides material to understand the activities.

The questions you have asked and the dialogue that we have had with you has shown a high level of understanding of the Scarborough Project. The Save Our Songlines website contains views on the Scarborough Project, summaries of the Scarborough Project, YouTube videos as well as links to other websites which also express opinions on the Scarborough Project.

Woodside has nevertheless continued to seek general and specific information from you and has demonstrated an ongoing willingness to receive information.

Notwithstanding all of this, we remain open and available to meet with you and continue ongoing consultation in good faith.

Payments – Woodside respectfully declines to pay for consultation meetings or legal costs.

Regards

[Redacted signature]

[Redacted signature]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount
Street
Perth WA 6000
Australia

T: + [Redacted]
M: [Redacted] 6
E: [Redacted]@woodside.com
www.woodside.com
f t in v @

From: Jess Border <jessica.border@edo.org.au>
Sent: Tuesday, 25 July 2023 4:17 PM
To: [Redacted]@woodside.com.au>
Cc: Alina Leikin <Alina.Leikin@edo.org.au>; [Redacted]@woodside.com.au>;
sue.mccarrey@nopsema.gov.au; Woodside Feedback <Feedback@woodside.com.au>
Subject: RE: Seismic Survey Consultation

Dear [Redacted]

If you could please provide the recording via Sharepoint, we will ensure it is passed onto Josie and Rae. Please let us know if you have any issues with this.

Kind regards

Jess

Jess Border | Solicitor | EDO

From: [Redacted]@woodside.com>
Sent: Tuesday, July 25, 2023 4:13 PM
To: Jess Border <jessica.border@edo.org.au>
Cc: Alina Leikin <Alina.Leikin@edo.org.au>; [Redacted]@woodside.com>;
sue.mccarrey@nopsema.gov.au; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Seismic Survey Consultation

Dear Jess

Thanks for your email.

I'll take it back to the team for discussion and will come back to you.

In the meantime – re the recording - yes, no problems. We will provide a copy of the recording to you. It is a big file and wont transmit via email (as it will exceed email size). Please can you let us know Josie / Raelene / SOS / EDO arrangements or potential for a sharepoint or sharefile (or the like) to enable transfer of the recording?

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount
Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v @

From: Jess Border <jessica.border@edo.org.au>
Sent: Tuesday, 25 July 2023 4:03 PM
To: [REDACTED]@woodside.com.au>
Cc: Alina Leikin <Alina.Leikin@edo.org.au>; [REDACTED]@woodside.com.au>;
sue.mccarrey@nopsema.gov.au; Woodside Feedback <Feedback@woodside.com.au>
Subject: Seismic Survey Consultation

Dear [REDACTED]

Thank you for the meeting this morning.

Recording

Our clients would be grateful if you could please provide them with the recording from today's meeting as soon as possible, so that they can review the information promptly.

Follow up questions

We look forward to receiving responses to the following requests for further information from Woodside:

1. The depth of the wells – both at and below sea level.
2. Have Woodside identified or done any mapping of freshwater systems in the EMBA?
3. What is the basis for the information on the whale migration patterns (we understand this comes from ACMS, government documents and consultation with Murujuga Aboriginal Corporation but would like further clarification and detail)?
4. Please provide the information underlying migratory patterns of whales, dugongs, turtles.
5. Please provide any information that has been collated about seagrass.
6. Please provide the underlying information for the modelling about the risk i.e. the 'worst possible scenario' discussion.

In addition to the above, our clients would appreciate clarification of the decibels and range of the seismic surveying that is to take place.

Next steps

As we discussed, it will take some time for our clients to process the information provided today and to respond to that information.

Woodside heard from our clients today about the importance of storytelling generally and of storytelling on Country. For this reason, our clients intend to provide Woodside with their initial response by way of video, taken on Murujuga. Following this, we propose that a second meeting be held to discuss our clients' response and to engage in further discussion. Our clients' first response is intended to be preliminary in nature and may need to be supplemented given that they are waiting on further information from Woodside.

We suggest that this approach be adopted for each EP in due course. That is:

1. Initial meeting to discuss an overview of the relevant EP, at which further requests for information can be made and questions asked about the information provided.
2. Initial response from Josie and Rae (could occur either before or after provision of further information, depending on our clients' availability).
3. Second meeting to discuss Josie and Rae's response, and responsive measures to mitigate risks and impacts of the activities.
4. Opportunity for Josie and Rae to provide supplementary information, if necessary. This may require a further meeting(s).

The approach should be flexible to ensure our clients are given ample opportunity to ask questions, share their knowledge, and be heard.

Other matters

Finally, our clients would be grateful if Woodside could provide the following:

1. Confirmation that the meetings held this morning forms part of the consultation prescribed by regulation 25 of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023* (formerly regulation 11A of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009*) in relation to the Seismic EP.
2. Detail in relation to Woodside's proposed payment to our clients for consultation meetings.

Please let me know if you have any comments or concerns in relation to the above. We otherwise look forward to receiving the further information and recording.

Kind regards

Jess



Environmental
Defenders Office

Jess Border — Solicitor

PO Box Z5218

Boorloo/Perth WA 6831

E: jessica.border@edo.org.au

I use she/her pronouns.

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EDO recognises the traditional owners and custodians of the land, seas and rivers of Australia. We pay our respects to Aboriginal and Torres Strait Islander elders past and present, and aspire to learn from traditional knowledge and customs so that, together, we can protect our environment and cultural heritage through law.

From: [Clare Lakewood](#)
To: sue.mccarrey@nopsema.gov.au
Cc: nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](#)
Subject: Urgent: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan
Date: Wednesday, 9 August 2023 11:12:00 PM
Attachments: [image001.png](#)
[Scarborough EP consultation.msg](#)
[230809 - Letter EDO to NOPSEMA.pdf](#)

Dear Ms McCarrey,

I refer to the abovementioned. Please see the attached correspondence.

We look forward to your response.

Please do not hesitate to contact me should you have any questions.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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EDO recognises the traditional owners and custodians of the land, seas and rivers of Australia. We pay our respects to Aboriginal and Torres Strait Islander elders past and present, and aspire to learn from traditional knowledge and customs so that, together, we can protect our environment and cultural heritage through law.



Environmental Defenders Office

Our Ref: AL:JB:S4118

9 August 2023

Sue McCarrey
Chief Executive Officer; NOPSEMA
By email: sue.mccarrey@nopsema.gov.au

Copy to: Ms Nicola Brischetto
nicola.brischetto@nopsema.gov.au

Ms Raquel Carter
raquel.carter@nopsema.gov.au

Dear Ms McCarrey

Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

We act for Ms Josie Alec and Ms Raelene Cooper.

We refer to the Scarborough 4D B1 Marine Seismic Survey Environment Plan (**Seismic Survey EP**), submitted by Woodside Energy Scarborough Pty Ltd (**Woodside**) and approved with conditions by NOPSEMA on 31 July 2023 (**Approval**).

We write regarding Woodside's foreshadowed imminent breach of the Approval conditions and urge NOPSEMA to exercise its powers to ensure the breach does not occur.

Notification of anticipated breach

Please find *enclosed* a series of email correspondence ending in an email received by our office from Woodside at 6:55pm this evening, 9 August 2023. Woodside has indicated that the Seismic Survey EP activity is anticipated to commence on 12 August 2023.

Our clients are of the firm view that consultation has not been undertaken in accordance with either the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* or the conditions on the Approval. Our clients have further information about their functions, interests and activities and how those may be affected by the activities the subject of the Seismic Survey EP, to provide to Woodside. This was confirmed by email communication to Woodside earlier today. Our clients have not had the opportunity to provide that further information in the nine days since the Seismic Survey EP was approved.

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E perth@edo.org.au **W** edo.org.au
PO Box Z5218, Boorloo/Perth WA 6831
ABN: 72002 880 864

Doc No.:

NOPSEMA should take action to prevent the breach from occurring

Woodside's foreshadowed approach is inconsistent with the representations made by NOPSEMA in a video call held in the evening of 31 August 2023. At that meeting, NOPSEMA ensured our clients that the conditions on the Approval are intended to:

- ensure that consultation was completed before Woodside commenced the activities the subject of the Seismic Survey EP;
- provide NOPSEMA with further oversight on how Woodside conducts consultation; and

NOPSEMA also emphasised to our clients that NOPSEMA could use its enforcement powers if Woodside did not comply with the conditions.

We request confirmation that, in light of our clients being notified that Woodside intends to commence the activities the subject of the Seismic Survey EP before undertaking consultation with our clients, NOPSEMA will act consistently with those representations and will exercise its regulatory powers to ensure compliance with the conditions.

Please do not hesitate to contact us should you wish to discuss. We look forward to hearing from you as a matter of urgency, in any in event, by no later than 5:00pm AWST on Thursday, 10 August 2023.

Yours sincerely,

Environmental Defenders Office



Clare Lakewood

Special Counsel, Safe Climate (Gas)

From: [Clare Lakewood](#)
To: [REDACTED]
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](#)
Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Thursday, 10 August 2023 6:25:55 PM
Attachments: [image001.png](#)
[230810 - Letter to Woodside - foreshadowed breach.pdf](#)

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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Environmental Defenders Office

10 August 2023

Woodside Energy Group Ltd

By email: jan.syminton@woodside.com

Copy to: Sue McCarrey
Chief Executive Officer; NOPSEMA
sue.mccarrey@nopsema.gov.au

Ms Nicola Brischetto
Deputy Director; Office of the Chief Executive; NOPSEMA
nicola.brischetto@nopsema.gov.au

Ms Raquel Carter
Chief Environmental Scientist
raquel.carter@nopsema.gov.au

Dear [REDACTED]

Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

1. I refer to your email received by us at 6.55pm on 9 August 2023. In that email you disclosed Woodside's intention to commence activities in the Scarborough 4D B1 Marine Seismic Survey Environment Plan (**Seismic Survey EP**), accepted with conditions by NOPSEMA on 31 July 2023 (**Acceptance**).
2. We confirm we act for Ms Josie Alec and Ms Raelene Cooper in respect of this matter.

Foreshadowed breach of conditions

3. Our clients are alarmed that Woodside intends to commence activities on 12 August 2023, before it has complied with the conditions in the Approval, in particular the following condition:

Prior to the commencement of the activity, the titleholders must consult with registered native title bodies corporate, representative Aboriginal/ Torres Strait Islanders Bodies and other persons or organisations identified as a relevant person in relation to First Nations cultural heritage in Tables 5-3 and 5-4 of the EP to confirm whether:

- (a) *They are aware of any people, who in accordance with Indigenous tradition, may have spiritual and cultural connections to the environment that may be affected by*

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the activity that have not yet been afforded the opportunity to provide information that may inform the management of the activity.

(b) *There is any information they wish to provide on cultural features and / or heritage values.*¹ (the **Consultation Condition**).

4. The relevant persons recognised in the Tables 5-3 and 5-4 of the Seismic Survey EP and in the Statement of Reasons included Save our Songlines,² a group of which our clients are members.
5. Your email of 9 August 2023, in the absence of any further consultation between Woodside and our clients since the Approval, does not constitute satisfaction of the Consultation condition. The intention of the conditions on the Approval is plain. Paragraphs [94], [95] [96] and [133] of the Acceptance demonstrate that Woodside must consult with our clients before commencing the activities in the Seismic Survey EP. Our client's position is that to do otherwise would constitute a breach of the Acceptance.
6. We reiterate that our clients do not consider they have been sufficiently consulted on the Seismic Survey EP. Woodside is aware from our previous correspondence (including our email of 9 August 2023) that it is our clients' firm view that:
 - consultation on the Seismic Survey EP is in its early stages;
 - our clients still have information to share about their functions, interests and activities relevant to the Seismic Survey EP; and
 - they require the opportunity to provide this important information to Woodside.
7. We request an undertaking from Woodside that it will not commence any activity under the Seismic Survey EP until it has fully consulted with our clients. **We seek that you provide that undertaking by 12pm (noon) AEST on Friday, 11 August 2023**, failing which we are instructed to seek injunctive relief in the Federal Court of Australia, without further notice.

Validity of the Seismic Survey EP

8. Furthermore, we consider the Approval is invalid. NOPSEMA's power under the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (**Regulations**) do not extend to NOPSEMA to dispense altogether with the essential contents of a plan, including the duty of the titleholder to consult under regulation 11A, and the requirement under reg 10A(g) that the environment plan demonstrate that the titleholder has carried out the consultation required by the reg 11A of Division 2.2A.
9. The NOPSEMA delegate has positively found, at paragraphs [96] and [97] of its decision of 31 July 2023 (incorrectly dated 31/02/2022), that consultation under 10(g) of the Regulations has not concluded. In these circumstances it is our view that NOPSEMA cannot lawfully accept the environment plan, or at minimum that the Acceptance of the Seismic Survey Environment Plan will not constitute a valid acceptance under the Regulations until the conditions are fulfilled. We refer to the correspondence sent to NOPSEMA today, copied to you, that sets out the basis for that view.

¹ Statement of Reasons, Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan at [133] (1).

² Implicit in the Statement of Reasons at [95]-[97].

10. Without a valid approval, Woodside cannot commence the Seismic Survey EP activities.
11. Given the importance of this matter to our clients, we request your response by no later than **12:00noon AEST tomorrow, Friday 11 August 2023.**

Our clients reserve their rights.

Yours faithfully

Environmental Defenders Office

A handwritten signature in black ink, appearing to read 'Clare', written in a cursive style.

Clare Lakewood

Special Counsel, Safe Climate (Gas)

From: Clare Lakewood 1371
Sent: Thu, 10 Aug 2023 18:27:43 +0800
To: sue.mccarrey@nopsema.gov.au
Cc: nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [REDACTED]; Jess Border
Subject: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan
Attachments: 230810 - Letter to NOPSEMA - validity of EP8453.pdf

JLB-1.9

Dear Ms McCarrey,

I refer to the abovementioned. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



**Clare Lakewood — Special Counsel,
Safe Climate**

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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Environmental Defenders Office

Our Ref: AL:JB:S4118

10 August 2023

Sue McCarrey
Chief Executive Officer; NOPSEMA

By email: sue.mccarrey@nopsema.gov.au

Copy to: Ms Nicola Brischetto
Deputy Director; Office of the Chief Executive; NOPSEMA
nicola.brischetto@nopsema.gov.au

Ms Raquel Carter
Chief Environmental Scientist
raquel.carter@nopsema.gov.au

[REDACTED]
Woodside Energy Group Ltd
[REDACTED]

Dear Ms McCarrey

Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

1. We act for Ms Josie Alec and Ms Raelene Cooper.
2. We write further to our correspondence of yesterday regarding the Scarborough 4D B1 Marine Seismic Survey Environment Plan (**Seismic Survey EP**), submitted by Woodside Energy Scarborough Pty Ltd (**Woodside**) and accepted with conditions by NOPSEMA on 31 July 2023 (**Acceptance**).
3. As you are aware from our letter of yesterday, our clients are concerned about Woodside's intention to commence the activities the subject of the Acceptance on Saturday, 12 August 2023, in circumstances where our clients have not been consulted in accordance with the conditions on the Seismic Survey EP, nor in accordance with Division 2.2A of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth)* (**Regulations**), as required by s 10A(g) of the Regulations.
4. Our position is that consultation with our clients is required by the Seismic Survey EP prior to *any* activity that is the subject of the Seismic Survey EP commencing. That is consistent with, and mandated by, the terms of the Acceptance, which state that the acceptance of the EP is subject to the condition, inter alia, that:

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E perth@edo.org.au **W** edo.org.au
PO Box Z5218, Boorloo/Perth WA 6831
ABN: 72002 880 864

Prior to the commencement of the activity, the titleholders must consult with registered native title bodies corporate, representative Aboriginal/ Torres Strait Islanders Bodies and other persons or organisations identified as a relevant person in relation to First Nations cultural heritage in Tables 5-3 and 5-4 of the EP to confirm whether:

- (a) *They are aware of any people, who in accordance with Indigenous tradition, may have spiritual and cultural connections to the environment that may be affected by the activity that have not yet been afforded the opportunity to provide information that may inform the management of the activity.*
 - (b) *There is any information they wish to provide on cultural features and / or heritage values.¹ (the **Consultation Condition**).*
5. The relevant persons recognised in the Tables 5-3 and 5-4 of the Seismic Survey EP and in the Statement of Reasons included Save our Songlines,² a group of which our clients are members.
 6. Our clients have further information they wish to provide on cultural features and heritage values of the environment that might be affected by the activity, and have not been given the opportunity to do this by the titleholder.
 7. By the terms of the conditional Acceptance of the EP, no activity can commence until that consultation is conducted and the Consultation Condition is fulfilled. Any such activity would contravene regulation 7 of the Regulations.

Validity of Seismic Survey EP

8. If the condition referred to above is interpreted in any way that would give the Acceptance force, and permit the activity to commence before the consultation referred to in the condition, and more generally as required by reg 11A of Division 2.2A, is completed, the Acceptance cannot, in our clients' view, be a valid acceptance in accordance with the Regulations. That conclusion arises for the following reasons.
9. The Approval is purportedly made pursuant to regulation 10 of the Regulations. In the Statement of Reasons for the Approval, the delegate states:
 - (a) The delegate is concerned that Woodside had not carried out all consultation required by Division 2.2A.³
 - (b) There was uncertainty as to whether all First Nations persons who may have cultural interests had been afforded a reasonable period to consult, and whether appropriate measures had been adopted as a result of the consultation.⁴
 - (c) Further consultation was to occur with Save our Songlines.⁵

¹ Statement of Reasons, Acceptance (with Conditions) of the Scarborough 4D B1 Marine Seismic Survey Environment Plan at [133] (1).

² Implicit in the Statement of Reasons at [95]-[97].

³ [94].

⁴ [94].

⁵ [94(e)].

- (d) There is uncertainty as to whether there is additional information held by First Nations people on the cultural features of the environment, including spiritual and cultural connections to the environment that may be affected by the activity.⁶
- (e) The delegate was not reasonably satisfied that consultation as required by Division 2.2A had been carried out (and therefore were not reasonably satisfied that reg 10A(g)(i) was met).⁷
10. Under regulation 10(1)(b), if NOPSEMA is not reasonably satisfied that an environment plan meets the criteria set out in regulation 10A, the Regulator must give the titleholder notice in writing under subregulation (2). NOPSEMA did so on several occasions.⁸
11. On 31 July 2023, despite making a finding that the delegate was not reasonably satisfied that consultation required by reg 11A of Division 2.2A had been carried out, (and therefore was not reasonably satisfied that the requirements of regulations 10A(g)(i) were met), the delegate then purported to exercise power pursuant to regulations 10(4)(b)(iii) and 10(6)(b), accepting the Environment Plan identified as Revision 7, June 2023 (**the Environment Plan**) subject to conditions.
12. Regulation 11A of Division 2.2A of the Regulations imposes a “duty on the titleholder”, as acknowledged by the Full Court of the Federal Court in *Santos NA Barossa Pty Ltd v Tipakalippa* [2022] FCFCA 1121. Further:
- “It is the performance of this duty which must be assessed by the delegate for the purposes of regulation 10A(g). To recall the criterion in reg 10A(g), read with reg 10(1)(a), the delegate must be reasonably satisfied that the titleholder has demonstrated it has:
- (a) carried out the consultations **required** by Div 2.2A; and
- (b) adopted, or proposes to adopt measures (if any) – relating to the environmental impacts and risks of the activity – that are appropriate because of the consultations”.⁹
13. Regulation 10A(g) is, a necessary pre-condition for the lawful acceptance of an environment plan.
14. Compliance with reg 11A is also necessary in order to be able to meet the criteria in reg 13(2), which states that a titleholder must describe the existing environment that may be affected by the activity, and include details of the particular relevant values and sensitivities (if any) of that environment, which as defined by reg 4 includes its social, economic and cultural features. It is not possible to assess those features in the absence of concluded consultation with a person or organisations who functions, interests or activities may be affected by the activities to be carried out under the environment plan.¹⁰ Thus, if NOPSEMA is not satisfied that the required consultation has been carried out, it cannot have the information necessary to determine whether criteria for an environment plan in reg 13(2) are met.

⁶ [95].

⁷ [96].

⁸ [7].

⁹ *Santos NA Barossa Pty Ltd v Tipakalippa* [2022] FCFCA 1121 at [49] (Kenny and Mortimer JJ). Bolded emphasis in the original.

¹⁰ Reg 11A(1)(d).

15. The use of conditions such as the condition referred to above cannot properly be used to dispense with the obligation in s 10A(g) for a titleholder to demonstrate that it *“has carried out consultations”* required prior to NOPSEMA approving the environment plan. Similarly, NOPSEMA cannot rectify any failure on the part of a titleholder to satisfy s 10A(g) and its duty under regulation 11A (which requires that the consultation be conducted **“[i]n the course of preparing an environment plan”** by purporting to impose conditions to address those deficiencies when accepting the environment plan.
16. Regulation 10(6), in providing for NOPSEMA to accept an environment plan “subject to limitations or conditions applying to operations for the activity”, does not provide for NOPSEMA to dispense with the obligatory criteria for the acceptance of an environment plan in regulation 10A; nor does it permit NOSPEMA to modify the titleholder’s duty under regulation 11A which must be discharged in the course of preparing the environment plan and not after. To interpret it otherwise would be entirely inconsistent with the regulatory scheme.
17. On this basis we consider that the Approval is invalid to the extent that it purports to have any effect before the consultation required by reg 11A of Subdivision 2.2A is completed.
18. In the circumstances, we seek that NOPSEMA take immediate regulatory action to prevent Woodside from commencing any activity the subject of the Approval on Saturday, 12 August 2023, or at any time prior to full consultation as required by reg 11A and relevantly described in the condition, is completed. We ask that NOPSEMA provide such assurance no later than **12 noon on Friday, 11 August 2023 (AEST)**, failing which we are instructed to seek injunctive relief against NOPSEMA and Woodside in the Federal Court of Australia without further notice.
19. Please do not hesitate to contact us should you wish to discuss. We look forward to hearing from you as a matter of urgency, in any in event, by no later than **12:00 noon AEST on Friday, 11 August 2023.**
20. Our clients reserve their rights.

Yours sincerely,

Environmental Defenders Office



Clare Lakewood

Special Counsel, Safe Climate (Gas)

From: [REDACTED]@woodside.com>

Sent: Fri, 11 Aug 2023 10:03:46 +0800

To: Clare Lakewood

Cc:

sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border [REDACTED]

[REDACTED]; Woodside Feedback

Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Attachments: 230810 - Letter to NOPSEMA - validity of EP8453.pdf, 230810 - Letter to Woodside - foreshadowed breach.pdf

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount
Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com

www.woodside.com



From: Clare Lakewood <clare.lakewood@edo.org.au>

Sent: Thursday, 10 August 2023 6:26 PM

To: [REDACTED]@woodside.com.au>

Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>

Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,

Clare



Environmental
Defenders Office

**Clare Lakewood — Special Counsel,
Safe Climate**

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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From: Clare Lakewood
Sent: Fri, 11 Aug 2023 12:12:36 +0800
To: [REDACTED]
Cc:

1378

JBL-1.11

sue.mccarrey@nopsema.gov.au;nicola.brischetto@nopsema.gov.au;raquel.carter@nopsema.gov.au;Jess Border [REDACTED]
[REDACTED];Woodside Feedback;Suzanne Hillier
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Categories: LEAP

Dear [REDACTED]

We refer to your email below which states that you “confirm activity will not commence under the Seismic Survey EP on 12 August 2023”.

You have not provided the undertaking requested in our letter that no activity be undertaken before consultation is complete. Your email also does not indicate when activity is intended to commence.

In the circumstances we remain concerned that activity may commence before the compulsory consultation requirements are completed; and more specifically, that you may commence activity over the course of the weekend. In these circumstances we continue to reserve the right to issue an application seeking injunctive relief today, a course which will be productive of unnecessary costs and an unnecessary demand on Court time outside of normal sitting hours.

We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



Environmental
Defenders Office

**Clare Lakewood — Special Counsel,
Safe Climate**

(Mon, Tue, Wed, Thu)
PO Box Z5218, Boorloo/Perth WA 6831
P: +61 8 6118 7912
E: clare.lakewood@edo.org.au

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From: [REDACTED]@woodside.com>

Sent: Friday, August 11, 2023 10:04 AM

To: Clare Lakewood <clare.lakewood@edo.org.au>

Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]@woodside.com>; Woodside Feedback <Feedback@woodside.com>

Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount
Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v @

From: Clare Lakewood <clare.lakewood@edo.org.au>

Sent: Thursday, 10 August 2023 6:26 PM

To: [REDACTED]@woodside.com.au>

Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>

Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



**Clare Lakewood — Special Counsel,
Safe Climate**

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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From: [REDACTED]
To: [Clare Lakewood](mailto:Clare.Lakewood)
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border); [REDACTED]; [Woodside Feedback](#); [Suzanne Hillier](#)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Friday, 11 August 2023 12:18:11 PM
Attachments: [image002.png](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.png](#)

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Friday, 11 August 2023 12:13 PM
To: [REDACTED]@woodside.com.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border) <jessica.border@edo.org.au>; [REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>; [Suzanne Hillier](mailto:Suzanne.Hillier@nopsema.gov.au) <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email below which states that you "confirm activity will not commence under the Seismic Survey EP on 12 August 2023".

You have not provided the undertaking requested in our letter that no activity be undertaken before consultation is complete. Your email also does not indicate when activity is intended to commence.

In the circumstances we remain concerned that activity may commence before the compulsory consultation requirements are completed; and more specifically, that you may commence activity over the course of the weekend. In these circumstances we continue to reserve the right to issue an application seeking injunctive relief today, a course which will be productive of unnecessary costs and an unnecessary demand on Court time outside of normal sitting hours.

We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity

under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Sent: Friday, August 11, 2023 10:04 AM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further

and will revert.

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
□ □ □ □ □

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Thursday, 10 August 2023 6:26 PM
To: [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>
Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate
(Mon, Tue, Wed, Thu)
PO Box Z5218, Boorloo/Perth WA 6831
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14 August 2023


Woodside Energy Group Ltd
By email: jan.syminton@woodside.com

Copy to: Sue McCarrey
Chief Executive Officer; NOPSEMA
sue.mccarrey@nopsema.gov.au

Suzanne Hillier
General Counsel
suzanne.hillier@nopsema.gov.au

Dear 

Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

I refer to our letter sent at 6:26pm on 10 August 2023. In that letter we set out our clients' position as to Woodside's foreshadowed breach of the conditions in NOPSEMA's acceptance of the Seismic Survey EP, and the validity of NOPSEMA's acceptance. We requested an undertaking from Woodside that it would not commence any activity under the Seismic Survey EP until it had fully consulted with our clients.

On 11 August 2023, you confirmed Woodside would not commence [activities] under the Seismic Survey EP on 12 August 2023.

On the same day, I wrote to Woodside noting that the undertaking we requested had not been provided, and seeking either:

- a) a written undertaking that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete; alternatively,
- b) an undertaking that Woodside would not commence any activity under the Seismic Survey EP prior to 10:00am AEST on 15 August 2023.

Woodside gave the second undertaking, confirming activity would not commence prior to 10:00am AEST on 15 August 2023.

We are yet to hear from you in relation to the substantive matters raised in our letter.

Noting there is less than 24 hours before the undertaking lapses, we again ask that Woodside provide a written undertaking by **3:30pm AEST, today (14 August 2023)** that no activity under the Seismic Survey EP will commence before the consultation process referred to in the conditions of

the Statement of Reasons is complete and that you give our clients, through us, 48 hours notice before commencing any activity under the Seismic Survey EP..

Alternatively, we ask that you provide a further undertaking to not commence activities until 12 noon AEST on Thursday August 2023, so that we can continue to discuss the substantive matters raised in our letter as to the validity of NOPSEMA's acceptance of the plan and the legality of any activity by Woodside in reliance on the plan.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file an application for interlocutory relief and rely upon this correspondence on any question of costs.

Our clients reserve their rights.

Yours sincerely

Environmental Defenders Office

A handwritten signature in black ink, appearing to read 'Clare', written in a cursive style.

Clare Lakewood

Special Counsel, Safe Climate (Gas)

«MATTER__Person_Acting_Qualifica»

From: [Clare Lakewood](#)
To: [REDACTED]
Cc: [REDACTED]; @nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](#); [Woodside Feedback](#); [Suzanne Hillier](#)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Monday, 14 August 2023 12:15:20 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)

Dear [REDACTED]

We note the omission of part of the date in the letter attached to the email below. For sake of clarity, we ask that you provide a further undertaking to not commence activities until 12 noon AEST on **Thursday 17 August 2023**, so that we can continue to discuss the substantive matters raised as to the validity of NOPSEMA's acceptance of the plan and the legality of any activity by Woodside in reliance on the plan.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)
 PO Box Z5218, Boorloo/Perth WA 6831
 P: +61 8 6118 7912
 E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Monday, August 14, 2023 11:51 AM
To: [REDACTED] <@woodside.com>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <@woodside.com>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

Thank you for your email. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

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From: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Sent: Friday, August 11, 2023 12:18 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards



Woodside Energy

Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
www.woodside.com



From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Friday, 11 August 2023 12:13 PM
To: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email below which states that you “confirm activity will not commence under the Seismic Survey EP on 12 August 2023”.

You have not provided the undertaking requested in our letter that no activity be undertaken before consultation is complete. Your email also does not indicate when activity is intended to commence.

In the circumstances we remain concerned that activity may commence before the compulsory consultation requirements are completed; and more specifically, that you may commence activity over the course of the weekend. In these circumstances we continue to reserve the right to issue an application seeking injunctive relief today, a course which will be productive of unnecessary costs and an unnecessary demand on Court time outside of normal sitting hours.

We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[REDACTED]@woodside.com>; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Thursday, 10 August 2023 6:26 PM
To: [REDACTED] <[REDACTED]@woodside.com.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>
Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
 Clare



Clare Lakewood — Special Counsel, Safe Climate
 (Mon, Tue, Wed, Thu)
 PO Box Z5218, Boorloo/Perth WA 6831
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From: [REDACTED]
To: [Clare Lakewood](mailto:Clare.Lakewood)
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border); [REDACTED]; [Woodside Feedback](#); [Suzanne Hillier](#)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Monday, 14 August 2023 1:38:46 PM
Attachments: [image002.png](#)
[image008.png](#)

Dear Clare

We refer to your email and time sensitive correspondence.

We confirm Woodside does intend to respond to your 10 August correspondence – that is intended to be with you today (or early tomorrow at the latest and before 8am WST in any event).

We confirm that no activity will take place under the seismic EP in the next 48 hours.

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)
www.woodside.com

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Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border) <jessica.border@edo.org.au>; [REDACTED]; [\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; [Woodside Feedback](mailto:Woodside.Feedback@woodside.com.au) <Feedback@woodside.com.au>; [Suzanne Hillier](mailto:Suzanne.Hillier@nopsema.gov.au) <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

Thank you for your email. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



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Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

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M: [REDACTED]
E: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
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Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

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We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



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Sent: Friday, August 11, 2023 10:04 AM
To: Clare Lakewood <clare.lakewood@edo.org.au>
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Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

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From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

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Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au;
raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>
Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



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From: [Sue McCarrey](#)
To: [Clare Lakewood](#)
Cc: [Nicola Brischetto](#); [Raquel Carter](#); [Syminton, Jan](#); [Jess Border](#); [Suzanne Hillier](#); [Cameron Grebe](#)
Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan
Date: Monday, 14 August 2023 3:19:47 PM
Attachments: [image003.png](#)
[image005.png](#)
[Response - NOPSEMA to EDO - 14 August 2023.pdf](#)

OFFICIAL

Dear Ms Lakewood,

Please see enclosed a response to your letter sent on Friday 11 August.

Kind Regards,

Sue McCarrey | Chief Executive Officer



National Offshore Petroleum Safety and Environmental Management Authority

T: (08) 6188 8808 | **E:** sue.mccarrey@nipsema.gov.au | **W:** nipsema.gov.au

To assure the protection of lives and the environment offshore.

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Acknowledgement of Country

NOPSEMA recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge First Nations Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

OFFICIAL

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Friday, August 11, 2023 5:28 PM
To: Sue McCarrey <sue.mccarrey@nipsema.gov.au>
Cc: Nicola Brischetto <nicola.brischetto@nipsema.gov.au>; Raquel Carter <Raquel.Carter@nipsema.gov.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Jess Border <jessica.border@edo.org.au>; Suzanne Hillier <Suzanne.Hillier@nipsema.gov.au>
Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

Dear Ms McCarrey,

Thank you for your email. Please find attached our response.

Kind regards,
Clare

**Climate**

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: Sue McCarrey <sue.mccarrey@nopsema.gov.au>
Sent: Friday, August 11, 2023 11:59 AM
To: Clare Lakewood <clare.lakewood@edo.org.au>; Sue McCarrey <sue.mccarrey@nopsema.gov.au>
Cc: Nicola Brischetto <nicola.brischetto@nopsema.gov.au>; Raquel Carter <Raquel.Carter@nopsema.gov.au>; [REDACTED] <[REDACTED]@woodside.com>; Jess Border <jessica.border@edo.org.au>
Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

OFFICIAL

Dear Ms Lakewood,

Please find enclosed a response to your letter that was sent to NOPSEMA on 10 August.

Kind Regards,

Sue McCarrey | Chief Executive Officer



National Offshore Petroleum Safety and Environmental Management Authority

T: (08) 6188 8808 | **E:** sue.mccarrey@nopsema.gov.au | **W:** nopsema.gov.au

To assure the protection of lives and the environment offshore.

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**Acknowledgement of Country**

NOPSEMA recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge First Nations Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

OFFICIAL

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Thursday, August 10, 2023 6:28 PM
To: Sue McCarrey <sue.mccarrey@nopsema.gov.au>
Cc: Nicola Brischetto <nicola.brischetto@nopsema.gov.au>; Raquel Carter <raquel.carter@nopsema.gov.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Jess Border <jessica.border@edo.org.au>
Subject: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

Dear Ms McCarrey,

I refer to the abovementioned. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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Our ref: ID: A982640

Ms Clare Lakewood
Special Counsel, Safe Climate (Gas)
Environmental Defenders Office
PO Box Z5218
BOORLOO/PERTH WA 6831

By email: clare.lakewood@edo.org.au

Dear Ms Lakewood

SCARBOROUGH 4D B1 MARINE SEISMIC SURVEY ENVIRONMENT PLAN

We refer to your letter of 11 August 2023 regarding the Woodside Energy Scarborough Pty Ltd (Woodside) Scarborough 4D B1 Seismic Survey Environment Plan (Seismic Survey EP).

In reference to paragraph 5 of your letter, we note that NOPSEMA does not "accept" notifications under regulation 29 of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009*. Rather, notification must be given to NOPSEMA of an intention to commence activity. NOPSEMA publishes notifications given by titleholders on its website.

In reference to paragraph 6 of your letter, we enclose a copy of NOPSEMA's publicly available brochure on inspections: [What to expect from a NOPSEMA inspection](#). We note that environmental inspections under Schedule 2A to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* are in respect of titleholders not third parties.

In reference to paragraph 7 of your letter, NOPSEMA does not accept that the decision is invalid. Nor do we accept the argument that it was not open to accept the Seismic Survey EP subject to conditions applying to operations for the activity under regulation 10(6)(b).

As previously indicated, should NOPSEMA determine as a result of the inspection that Woodside is non-compliant with the conditions imposed on the Seismic Survey EP, NOPSEMA will take appropriate action.

Yours sincerely,



Sue McCarrey
Chief Executive Officer

14 August 2023

From: [REDACTED]
To: [Clare Lakewood](mailto:Clare.Lakewood)
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border); [REDACTED]; [Woodside Feedback](#); [Suzanne Hillier](#)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Monday, 14 August 2023 6:57:14 PM
Attachments: [image001.png](#)
[image007.png](#)

Dear Clare

We refer to the email below.

As per the email below, we reiterate that no activity will take place under the seismic EP in the 48 hours from my earlier email (ie 2pm Perth time on Wednesday 16 August 2023).

We confirm Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we will not be in a position to provide that response by 8am tomorrow morning (Perth time). We anticipate providing the response to you by Wednesday morning (Perth time).

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
 f t in v @

From: [REDACTED]
Sent: Monday, 14 August 2023 1:39 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border) <jessica.border@edo.org.au>; [REDACTED]; [REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>; [Suzanne Hillier](mailto:Suzanne.Hillier@nopsema.gov.au) <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to your email and time sensitive correspondence.

We confirm Woodside does intend to respond to your 10 August correspondence – that is intended to be with you today (or early tomorrow at the latest and before 8am WST in any event).

We confirm that no activity will take place under the seismic EP in the next 48 hours.

Kind regards

[REDACTED]

Woodside Energy

T: [REDACTED]



Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Monday, 14 August 2023 11:51 AM
To: [REDACTED]@woodside.com.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au;
raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]
[REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>;
Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

Thank you for your email. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)
PO Box Z5218, Boorloo/Perth WA 6831
P: +61 8 6118 7912
E: clare.lakewood@edo.org.au

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From: [REDACTED]@woodside.com>
Sent: Friday, August 11, 2023 12:18 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au;
raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]
[REDACTED]@woodside.com>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v @

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Friday, 11 August 2023 12:13 PM
To: [REDACTED]@woodside.com.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email below which states that you “confirm activity will not commence under the Seismic Survey EP on 12 August 2023”.

You have not provided the undertaking requested in our letter that no activity be undertaken before consultation is complete. Your email also does not indicate when activity is intended to commence.

In the circumstances we remain concerned that activity may commence before the compulsory consultation requirements are completed; and more specifically, that you may commence activity over the course of the weekend. In these circumstances we continue to reserve the right to issue an application seeking injunctive relief today, a course which will be productive of unnecessary costs and an unnecessary demand on Court time outside of normal sitting hours.

We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving

service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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From: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Sent: Friday, August 11, 2023 10:04 AM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
www.woodside.com
 f t in v @

From: Clare Lakewood <clare.lakewood@edo.org.au>

Sent: Thursday, 10 August 2023 6:26 PM

To: [REDACTED]@woodside.com.au>

Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>

Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Tuesday, 15 August 2023 1:52:16 PM
Attachments: [image001.png](#)
[image007.png](#)

Dear Clare

We refer to the email trail below.

A further update to timing: Woodside confirms that no activity will take place under the seismic EP before Friday 12pm Perth time.

We reiterate that Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we anticipate providing the response to you by Friday morning (Perth time).

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in y i

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Sent: Monday, 14 August 2023 6:57 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border <jessica.border@edo.org.au>](mailto:Jess.Border@edo.org.au); [REDACTED]; [REDACTED]@woodside.com.au; Woodside Feedback <Feedback@woodside.com.au>; [Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>](mailto:Suzanne.Hillier@nopsema.gov.au)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to the email below.

As per the email below, we reiterate that no activity will take place under the seismic EP in the 48 hours from my earlier email (ie 2pm Perth time on Wednesday 16 August 2023).

We confirm Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we will not be in a position to provide that response by 8am tomorrow morning (Perth time). We anticipate providing the response to you by Wednesday morning (Perth time).

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
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[REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>;
Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to your email and time sensitive correspondence.

We confirm Woodside does intend to respond to your 10 August correspondence – that is intended to be with you today (or early tomorrow at the latest and before 8am WST in any event).

We confirm that no activity will take place under the seismic EP in the next 48 hours.

Kind regards

[REDACTED]



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Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

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Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

Thank you for your email. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

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Sent: Friday, August 11, 2023 12:18 PM
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Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards

[REDACTED]



Woodside Energy

Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
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Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email below which states that you “confirm activity will not commence under the Seismic Survey EP on 12 August 2023”.

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We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

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Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[REDACTED]@woodside.com>; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
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Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
 Clare



Clare Lakewood — Special Counsel, Safe Climate
 (Mon, Tue, Wed, Thu)
 PO Box Z5218, Boorloo/Perth WA 6831
 P: +61 8 6118 7912
 E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: [Clare Lakewood](#)
To: [REDACTED]
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](#); [REDACTED]; [Woodside Feedback](#); [Suzanne Hillier](#)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Tuesday, 15 August 2023 5:47:00 PM
Attachments: [230815 Letter to Woodside - undertaking.pdf](#)
[image007.png](#)
[image008.png](#)

Dear [REDACTED]

I refer to your email below. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)
 PO Box Z5218, Boorloo/Perth WA 6831
 P: +61 8 6118 7912
 E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: [REDACTED]@woodside.com>
Sent: Tuesday, August 15, 2023 1:52 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border <jessica.border@edo.org.au>](mailto:Jess.Border@edo.org.au); [REDACTED]; [REDACTED]@woodside.com>; [Woodside Feedback <Feedback@woodside.com>](mailto:Woodside.Feedback@woodside.com); [Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>](mailto:Suzanne.Hillier@nopsema.gov.au)
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to the email trail below.

A further update to timing: Woodside confirms that no activity will take place under the seismic EP before Friday 12pm Perth time.

We reiterate that Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we anticipate providing the response to you by Friday morning (Perth time).

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v @

From: [REDACTED]
Sent: Monday, 14 August 2023 6:57 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; Woodside Feedback <Feedback@woodside.com.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to the email below.

As per the email below, we reiterate that no activity will take place under the seismic EP in the 48 hours from my earlier email (ie 2pm Perth time on Wednesday 16 August 2023).

We confirm Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we will not be in a position to provide that response by 8am tomorrow morning (Perth time). We anticipate providing the response to you by Wednesday morning (Perth time).

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v @

From: [REDACTED]
Sent: Monday, 14 August 2023 1:39 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; Woodside Feedback <Feedback@woodside.com.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to your email and time sensitive correspondence.

We confirm Woodside does intend to respond to your 10 August correspondence – that is intended to be with you today (or early tomorrow at the latest and before 8am WST in any event).

We confirm that no activity will take place under the seismic EP in the next 48 hours.

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Monday, 14 August 2023 11:51 AM
To: [REDACTED]@woodside.com.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au;
raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]
[REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>;
Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

Thank you for your email. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)
PO Box Z5218, Boorloo/Perth WA 6831
P: +61 8 6118 7912
E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: [REDACTED]@woodside.com>

Sent: Friday, August 11, 2023 12:18 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
 f t in v @

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Friday, 11 August 2023 12:13 PM
To: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email below which states that you “confirm activity will not commence under the Seismic Survey EP on 12 August 2023”.

You have not provided the undertaking requested in our letter that no activity be undertaken before consultation is complete. Your email also does not indicate when activity is intended to commence.

In the circumstances we remain concerned that activity may commence before the compulsory consultation requirements are completed; and more specifically, that you may commence activity over the course of the weekend. In these circumstances we continue to reserve the right to issue an application seeking injunctive relief today, a course which will be productive of unnecessary costs and an unnecessary demand on Court time outside of normal sitting hours.

We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Sent: Friday, August 11, 2023 10:04 AM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Thursday, 10 August 2023 6:26 PM
To: [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>
Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate
(Mon, Tue, Wed, Thu)
PO Box Z5218, Boorloo/Perth WA 6831
P: +61 8 6118 7912
E: clare.lakewood@edo.org.au

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Environmental Defenders Office

Woodside Energy Group Ltd

By email:

Copy to: Sue McCarrey
Chief Executive Officer; NOPSEMA
sue.mccarrey@nopsema.gov.au

Suzanne Hillier
General Counsel
suzanne.hillier@nopsema.gov.au

Dear

Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

1. We refer to the history of correspondence since 9 August 2023:
 - a. On 9 August 2023 at 6:54 PM AWST, you advised us by email that Woodside would be commencing activity under the Seismic Survey EP on 12 August 2023.
 - b. On 10 August 2023 at 6:26 PM AWST, we wrote to you to raise our concern in Woodside’s intention to commence activities before it had complied with the conditions in the approved Seismic Survey EP. We also copied to this correspondence to NOPSEMA. These letters explained our views as to the reasons why the Acceptance of the Seismic Survey EP was invalid, or alternatively why compliance with the conditions prior to any activity was mandatory. We sought an undertaking that Woodside would not commence any activity under the Seismic Survey EP until it had complied with the relevant conditions by fully consulting our clients.
 - c. We have received no substantive response to any of the matters raised in that correspondence. Nor have we received an undertaking in the terms sought.
 - d. On Friday 11 August 2023 at 10:04 AM AWST, you wrote to us to advise “activity will not commence under the Seismic Survey EP on 12 August 2023”.
 - e. On Friday 11 August 2023 at 12:13 PM AWST we wrote to you noting the very limited terms of your statement as to when activities would not commence, and pointing out the serious inconvenience to the Court if it was necessary to seek injunctive relief over the weekend. We requested an undertaking that no activity under the Seismic Survey EP would commence before the consultation process referred to in the conditions in

T +61 8 6118 7919
E perth@edo.org.au W edo.org.au
PO Box Z5218 Boorloo/Perth WA 6831
ABN: 72002 880 864

the approved Seismic Survey EP were complete; or alternatively any activity prior to 10 AM on 15 August 2023.

- f. On 11 August 2023 at 12:38 PM AWST, you wrote to us to confirm “activity will not commence under the Seismic Survey EP prior 10am AEST (8am WST) on 15 August 2023.”
 - g. On 14 August 2023 at 11:51 AM AWST, we wrote to you to and again request that no activity would commence before the consultation process referred to in the conditions in the approved Seismic Survey EP were complete.
 - h. On 14 August 2023, we received an email at 6:57 PM AWST, in which you confirmed that no activity will take place under the seismic EP before 2pm Perth Wednesday 16 August (ie, 4 PM AEST Wednesday 16 August 2023). You say also in that email that Woodside anticipated providing a substantive response to our clients on the matters raised with you on 10 August 2023 by Wednesday morning (16 August 2023).
 - i. On 15 August 2023, we received an email at 1:52 PM AWST, in which you confirmed that no activity will take place under the seismic EP before Friday 12pm Perth time (ie, 2 PM AEST 18 August 2023) and stated that Woodside anticipates providing a response to our clients by Friday morning Perth time (ie, 18 August 2023).
2. The proposed timetable for a response is unacceptable to our client. You have provided no basis for the extended delay in responding, nor have you provided an undertaking to comply with the consultation obligations in the Seismic Survey EP prior to commencing any activity. Should you, in your correspondence foreshadowed for 2PM AEST on Friday, 18 August 2023 not involve the giving of that undertaking we will be in the invidious position of needing to file on Friday and seek injunctive relief over the weekend. As we pointed out in our correspondence last Friday, this is not only inconvenient for our client and her legal representatives, but an inappropriate burden on the Court’s time out of regular business hours.
 3. If you are unwilling, or do not provide by **5 PM AEST Wednesday, 16 August 2023**, the undertakings most recently requested in our letter of 14 August 2023, being that Woodside:
 - a. will not commence any activity under the Seismic Survey EP until it has fully consulted with our clients; and
 - b. will provide our clients, through us, 48 hours notice before commencing any activity under the Seismic Survey EP
 we will proceed to file an application for interlocutory relief without further notice.
 4. We consider such application necessary to avoid the wasteful use of the court’s resources over the weekend, and will rely upon this correspondence on any question of costs.

Electronic Service

5. You also have not responded to our request in our email of 11 August 2023 to confirm that Woodside’s consent to service of the abovementioned application electronically.
6. We ask that before 5 PM AEST Wednesday, 16 August 2023, Woodside confirm that it consents to receiving service electronically.
7. Our clients reserve their rights.

Environmental Defenders Office

A handwritten signature in black ink, appearing to read 'Clare', written in a cursive style.

Clare Lakewood

Special Counsel, Safe Climate (Gas)

From: [Clare Lakewood](#)
To: [Sue McCarrey](#)
Cc: [Nicola Brischetto](#); [Raquel Carter](#); [REDACTED]; [Jess Border](#); [Suzanne Hillier](#); [Cameron Grebe](#)
Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan
Date: Tuesday, 15 August 2023 5:57:00 PM
Attachments: [230815 - Letter to NOPSEMA.pdf](#)
[image001.png](#)
[image003.png](#)

Dear Ms McCarrey,

We refer to your email below. Please see the attached correspondence.

Yours sincerely,

Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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From: Sue McCarrey <sue.mccarrey@nopsema.gov.au>

Sent: Monday, August 14, 2023 3:20 PM

To: Clare Lakewood <clare.lakewood@edo.org.au>

Cc: Nicola Brischetto <nicola.brischetto@nopsema.gov.au>; Raquel Carter <Raquel.Carter@nopsema.gov.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Jess Border <jessica.border@edo.org.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>; Cameron Grebe <Cameron.Grebe@nopsema.gov.au>

Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

OFFICIAL

Dear Ms Lakewood,

Please see enclosed a response to your letter sent on Friday 11 August.

Kind Regards,

Sue McCarrey | Chief Executive Officer



National Offshore Petroleum Safety and Environmental Management Authority

T: [\(08\) 6188 8808](tel:(08)61888808) | E: sue.mccarrey@nopsema.gov.au | W: nopsema.gov.au

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OFFICIAL

From: Clare Lakewood <clare.lakewood@edo.org.au>

Sent: Friday, August 11, 2023 5:28 PM

To: Sue McCarrey <sue.mccarrey@nopsema.gov.au>

Cc: Nicola Brischetto <nicola.brischetto@nopsema.gov.au>; Raquel Carter

<Raquel.Carter@nopsema.gov.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Jess

Border <jessica.border@edo.org.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>

Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

Dear Ms McCarrey,

Thank you for your email. Please find attached our response.

Kind regards,

Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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From: Sue McCarrey <sue.mccarrey@nopsema.gov.au>

Sent: Friday, August 11, 2023 11:59 AM

To: Clare Lakewood <clare.lakewood@edo.org.au>; Sue McCarrey <sue.mccarrey@nopsema.gov.au>

Cc: Nicola Brischetto <nicola.brischetto@nopsema.gov.au>; Raquel Carter <Raquel.Carter@nopsema.gov.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Jess Border <jessica.border@edo.org.au>

Subject: RE: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

OFFICIAL

Dear Ms Lakewood,

Please find enclosed a response to your letter that was sent to NOPSEMA on 10 August.

Kind Regards,

Sue McCarrey | Chief Executive Officer



National Offshore Petroleum Safety and Environmental Management Authority

T: [\(08\) 6188 8808](tel:(08)61888808) | **E:** sue.mccarrey@nopsema.gov.au | **W:** nopsema.gov.au

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NOPSEMA recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge First Nations Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

OFFICIAL

From: Clare Lakewood <clare.lakewood@edo.org.au>

Sent: Thursday, August 10, 2023 6:28 PM

To: Sue McCarrey <sue.mccarrey@nopsema.gov.au>

Cc: Nicola Brischetto <nicola.brischetto@nopsema.gov.au>; Raquel Carter <raquel.carter@nopsema.gov.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Jess Border <jessica.border@edo.org.au>

Subject: Scarborough Trunkline Installation 4D B1 Marine Seismic Survey Environment Plan

Dear Ms McCarrey,

I refer to the abovementioned. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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Environmental Defenders Office

15 August 2023

Ms Sue McCarrey, Chief Executive Officer, NOPSEMA

By email: sue.mccarrey@nopsema.gov.au

Copy to: Ms Suzanne Hillier, General Counsel, NOPSEMA
suzanne.hillier@nopsema.gov.au

[REDACTED]
Woodside Energy Group Ltd
[REDACTED]

Dear Ms McCarrey

Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

1. We refer to our letter dated 11 August and your letter in response dated 14 August 2023. In your response, you referred to the brochure 'What to expect from a NOPSEMA inspection' (**Brochure**) and noted that NOPSEMA does not accept that its decision to accept the Seismic Survey EP with conditions (**Acceptance**) was invalid.
2. The Brochure provides no indication as to what action NOPSEMA is taking to assess compliance with the consultation conditions in [133] of the Acceptance. Further, the Brochure does not describe how consultation requirements imposed as a condition of an accepted environment plan would be monitored.
3. Consequently, we remain concerned that NOPSEMA is not taking appropriate action to ensure compliance with the consultation conditions.
4. Given that we have not received assurance from NOPSEMA that it is taking appropriate action, if, by **5PM AEST on Wednesday 16 August 2023**, we do not obtain an undertaking from Woodside that it will not undertake activity under the Seismic Survey EP until consultation is complete and will give our clients, through us, 48 hours of any notice to commence activities under the Seismic Survey EP, we will file an application for injunctive relief.

Electronic Service

5. We request that NOPSEMA confirm that it is content to accept service electronically and, if so, provide an email address for that purpose.
6. Our clients reserve their rights.

Yours sincerely

T +61 8 6118 7919
E perth@edo.org.au **W** edo.org.au
PO Box Z5218 Boorloo/Perth WA 6831
ABN: 72002 880 864

Environmental Defenders Office

A handwritten signature in black ink, appearing to read 'Clare', written in a cursive style.

Clare Lakewood

Special Counsel, Safe Climate (Gas)

From: [REDACTED]
To: [Clare Lakewood](mailto:Clare.Lakewood@edo.org.au)
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; [Jess Border](mailto:Jess.Border@edo.org.au); [REDACTED]; [Woodside Feedback](mailto:Woodside.Feedback@woodside.com.au); [Suzanne Hillier](mailto:Suzanne.Hillier@nopsema.gov.au)
Subject: Re: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan
Date: Wednesday, 16 August 2023 2:50:31 PM
Attachments: [image007.png](#)
[image008.png](#)

Dear Clare

Receipt of your letter is acknowledged.

Our correspondence has put your client in no worse position and has provided confirmation around activity under the seismic EP.

To address your concerns about weekend burden on the Court, we confirm that no activity will take place under the seismic EP before 2pm Wednesday 23 August (Perth time).

We continue to obtain instructions on the matters raised in your 10 August letter. The matters raised are serious and require coordinated instructions. We confirm we intend to provide a response by close of business Monday 21 August (Perth time).

Kind regards

[REDACTED]

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Tuesday, August 15, 2023 5:47 pm
To: [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>
Cc: sue.mccarrey@nopsema.gov.au <sue.mccarrey@nopsema.gov.au>; nicola.brischetto@nopsema.gov.au <nicola.brischetto@nopsema.gov.au>; raquel.carter@nopsema.gov.au <raquel.carter@nopsema.gov.au>; [Jess Border](mailto:Jess.Border@edo.org.au) <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; [Woodside Feedback](mailto:Woodside.Feedback@woodside.com.au) <Feedback@woodside.com.au>; [Suzanne Hillier](mailto:Suzanne.Hillier@nopsema.gov.au) <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

I refer to your email below. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate
 (Mon, Tue, Wed, Thu)
 PO Box Z5218, Boorloo/Perth WA 6831
 P: +61 8 6118 7912
 E: clare.lakewood@edo.org.au

I use she/her pronouns.

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today.

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From: [REDACTED]@woodside.com>
Sent: Tuesday, August 15, 2023 1:52 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]@woodside.com>; Woodside Feedback <Feedback@woodside.com>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to the email trail below.

A further update to timing: Woodside confirms that no activity will take place under the seismic EP before Friday 12pm Perth time.

We reiterate that Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we anticipate providing the response to you by Friday morning (Perth time).

Kind regards

[REDACTED]



Woodside Energy
 Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
 f t in v @

From: [REDACTED]
Sent: Monday, 14 August 2023 6:57 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]@woodside.com.au>; Woodside Feedback <Feedback@woodside.com.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to the email below.

As per the email below, we reiterate that no activity will take place under the seismic EP in the 48 hours

from my earlier email (ie 2pm Perth time on Wednesday 16 August 2023).

We confirm Woodside intends to respond to your 10 August correspondence. By way of update to my email below, we will not be in a position to provide that response by 8am tomorrow morning (Perth time). We anticipate providing the response to you by Wednesday morning (Perth time).

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
f t in v i

From: [REDACTED]
Sent: Monday, 14 August 2023 1:39 PM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; Woodside Feedback <Feedback@woodside.com.au>; Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We refer to your email and time sensitive correspondence.

We confirm Woodside does intend to respond to your 10 August correspondence – that is intended to be with you today (or early tomorrow at the latest and before 8am WST in any event).

We confirm that no activity will take place under the seismic EP in the next 48 hours.

Kind regards

[REDACTED]



Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]@woodside.com
www.woodside.com
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From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Monday, 14 August 2023 11:51 AM
To: [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; Woodside Feedback <Feedback@woodside.com.au>;

Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>

Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

Thank you for your email. Please see the attached correspondence, which requires a time-sensitive response.

Yours sincerely,
Clare



Clare Lakewood – Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

I use she/her pronouns.

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From: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>

Sent: Friday, August 11, 2023 12:18 PM

To: Clare Lakewood <clare.lakewood@edo.org.au>

Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au;

raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]

[REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>; Suzanne

Hillier <Suzanne.Hillier@nopsema.gov.au>

Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

Thanks for your email.

We confirm that activity will not commence under the Seismic Survey Environment Plan prior 10am AEST (8am WST) on 15 August 2023.

Kind regards

[REDACTED]

Woodside Energy
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000

T: [REDACTED]
M: [REDACTED]
E: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
www.woodside.com



Australia



From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Friday, 11 August 2023 12:13 PM
To: [REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au;
raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED]
[REDACTED] <[\[REDACTED\]@woodside.com.au](mailto:[REDACTED]@woodside.com.au)>; Woodside Feedback <Feedback@woodside.com.au>;
Suzanne Hillier <Suzanne.Hillier@nopsema.gov.au>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email below which states that you “confirm activity will not commence under the Seismic Survey EP on 12 August 2023”.

You have not provided the undertaking requested in our letter that no activity be undertaken before consultation is complete. Your email also does not indicate when activity is intended to commence.

In the circumstances we remain concerned that activity may commence before the compulsory consultation requirements are completed; and more specifically, that you may commence activity over the course of the weekend. In these circumstances we continue to reserve the right to issue an application seeking injunctive relief today, a course which will be productive of unnecessary costs and an unnecessary demand on Court time outside of normal sitting hours.

We ask that you provide a written undertaking by **3:30pm AEST, today (11 August 2023)** that no activity under the Seismic Survey Environment Plan will commence before the consultation process referred to in the conditions of the Statement of Reasons is complete.

Alternatively, we will refrain from filing an application today if you give an undertaking not to commence any activity under the Seismic Survey Environment Plan prior to 10:00am AEST on 15 August 2023. We will in the interim continue to discuss with you our requirement of the primary protective undertaking, not to commence activity until consultation is complete and reserve our rights as to any future legal action.

If you are unwilling, or do not provide, either of the written undertakings referred to above by 3:30pm AEST today we will proceed to file our application for interlocutory relief and rely upon this correspondence on any question of costs.

We ask that both Woodside and NOPSEMA representatives confirm that they consent to receiving service electronically.

We copy NOPSEMA representatives to this correspondence.

Yours sincerely,
Clare

**Climate**

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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From: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Sent: Friday, August 11, 2023 10:04 AM
To: Clare Lakewood <clare.lakewood@edo.org.au>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>; [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>; Woodside Feedback <Feedback@woodside.com>
Subject: RE: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear Clare

We confirm receipt of your email.

We confirm activity will not commence under the Seismic Survey EP on 12 August 2023.

From our initial review of your letter, we do not accept your position but we are considering it further and will revert.

Kind regards

[REDACTED]

**Woodside Energy**

Mia Yellagonga
 Karlak, 11 Mount Street
 Perth WA 6000
 Australia

T: [REDACTED]
M: [REDACTED]
E: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
www.woodside.com
 f t in v i

From: Clare Lakewood <clare.lakewood@edo.org.au>
Sent: Thursday, 10 August 2023 6:26 PM
To: [REDACTED] <[\[REDACTED\]@woodside.com](mailto:[REDACTED]@woodside.com)>
Cc: sue.mccarrey@nopsema.gov.au; nicola.brischetto@nopsema.gov.au; raquel.carter@nopsema.gov.au; Jess Border <jessica.border@edo.org.au>
Subject: Scarborough Gas Project – Scarborough 4D B1 Marine Seismic Survey Environment Plan

Dear [REDACTED]

We refer to your email received by us on 9 August 2023. Please see the attached. We look forward to your prompt response.

Yours sincerely,
Clare



Clare Lakewood — Special Counsel, Safe Climate

(Mon, Tue, Wed, Thu)

PO Box Z5218, Boorloo/Perth WA 6831

P: +61 8 6118 7912

E: clare.lakewood@edo.org.au

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